

August 15, 2007

NVS-213car
PE07-028

8/21/07

Mr. Jeffrey L. Quandt, Chief
Vehicle Control Division
Office of Defects Investigation
U.S. DEPARTMENT OF TRANSPORTATION
National Highway Traffic Safety Administration
1200 New Jersey Avenue, S.E.
Washington, DC 20590

Dear Mr. Quandt:

In reply to your letter dated June 28, 2007, we are submitting a partial response regarding an investigation into allegations that the pressure relief device allegedly failed to activate in MY 1998 through 2007 Honda Civic CNG vehicles. We will submit responses to the remaining questions on or before our extended due date of September 3, 2007.

1. State, by model and model year, the total number of subject peer vehicles Honda has manufactured for sale or lease in the United States. Separately, for each vehicle manufactured to date by Honda, state the following:
 - a. Vehicle Identification number (VIN);
 - b. Make;
 - c. Model;
 - d. Model Year;
 - e. Date of manufacture;
 - f. Date warranty coverage commenced; and
 - g. The State in the United States where the vehicle was originally sold or leased (or delivered for sale or lease).

Provide the table in Microsoft Access 2000, or a compatible format, entitled "PRODUCTION DATA." See Enclosure 1, Data Collection Disc, for a pre-formatted table which provides further details regarding this submission.

Response: The data elements "a" through "g" are filed on the enclosed CD.

Make	Model	Model Year	Sales
Honda	Civic CNG	1998	514
		1999	600
		2000	720
		2001	788
		2002	721
		2003	450
		2004	782
		2005	597
		2006	330
	2007	896	
Total			6398

Source(s): Production records
As of: June 30, 2007

2. State the number of each of the following, received by Honda, or of which Honda is otherwise aware, which relate to, or may relate to, the alleged defect in the subject vehicles:
- a. Consumer complaints, including those from fleet operators;
 - b. Field reports, including dealer field reports;
 - c. Reports involving a crash, injury, or fatality, based on claims against the manufacturer involving a death or injury, notices received by the manufacturer alleging or proving that a death or injury was caused by a possible defect in a subject peer vehicle, property damage claims, consumer complaints, or field reports;
 - d. Reports involving a fire, based on claims against the manufacturer involving a death or injury, notices received by the manufacturer alleging or proving that a death or injury was caused by a possible defect in a subject vehicle, property damage claims, consumer complaints, or field reports;
 - e. Property damage claims; and
 - f. Third-party arbitration proceedings where Honda is or was a party to the arbitration; and
 - g. Lawsuits, both pending and closed, in which Honda is or was a defendant or codefendant.

For subparts "a" through "e" state the total number of each item (e.g., consumer complaints, field reports, etc.) separately. Multiple incidents involving the same vehicle are to be counted separately. Multiple reports of the same incident are also to be counted separately (i.e., a consumer complaint and a field report involving the same incident in which a crash occurred are to be counted as a crash report, a field report and a consumer complaint).

In addition, for items "c" through "g," provide a summary description of the alleged problem and causal and contributing factors and Honda's assessment of the problem, with a summary of the significant underlying facts and evidence. For items "f" and "g," identify the parties to the action, as well as the caption, court, docket number, and date on which the complaint or other document initiating the action was filed.

Response: The total number of reports for items "a" through "e" are stated in the table below.

Model	Model Year	A Owner/ Fleet Reports	B Field/ Dealer Reports	C Crash, Injury, Fatality Reports	D Fire	E Property Damage	F Third Party	G Lawsuits
Civic CNG	1998	0	0	0	0	0	0	0
	1999	0	0	0	0	0	0	0
	2000	0	0	0	0	0	0	0
	2001	0	0	0	0	0	0	0
	2002	0	0	0	0	0	0	0
	2003	1	0	0	1	0	0	0
	2004	0	0	0	0	0	0	0
	2004	0	0	0	0	0	0	0
	2006	0	0	0	0	0	0	0
	2007	0	0	0	0	0	0	0

The single consumer complaint report that Honda received is based on the incident that occurred on March 26, 2007 which initiated this inquiry.

Source(s): Customer Relations, Tech Line, Field Reports, Claims and Lawsuits.
 As of: June 30, 2007

3. Separately, for each item (complaint, report, claim, notice, or matter) within the scope of your response to Request No. 2, state the following information:
- Honda's file number or other identified used;
 - The category of the item, as identified in Request No. 2 (i.e., consumer complaint, field report, etc.);
 - Vehicle owner or fleet name (and fleet contact person), address, and telephone number;
 - Vehicle's VIN;
 - Vehicle's make, model and model year;
 - Vehicle's mileage at time of incident;
 - Incident date;
 - Report or claim date;
 - Whether a crash is alleged;
 - Whether a fire is alleged;
 - Whether property damage is alleged;
 - Number of alleged injuries, if any;
 - Number of alleged fatalities, if any.

Provide this information in Microsoft Access 2000, or a compatible format, entitled "REQUEST NUMBER TWO DATA." See Enclosure 1, Data Collection Disc, for a pre-formatted table which provides further details regarding this submission.

Response: The data elements "a" through "m" are filed on the enclosed CD.

Source(s): Customer Relations, Tech Line, Field Reports, Claims and Lawsuits.
As of: June 30, 2007

4. Produce copies of all documents related to each item within the scope of Request No. 2. Organize the documents separately by category (i.e., consumer complaints, field reports, etc.) and describe the method Honda used for organizing the documents.

Response: See Attachment #4 for the single consumer complaint received.

Source(s): Customer Relations, Tech Line, Field Reports, Claims and Lawsuits.
As of: June 30, 2007

5. State, by model year, a total count for all of the following categories of claims, collectively, that have been paid by Honda to date that relate to, or may relate to, the subject components in the subject vehicles: warranty claims; extended warranty claims; claims for good will services that were provided; field, zone, or similar adjustments and reimbursements; and warranty claims or repairs made in accordance with a procedure specified in a technical service bulletin or customer satisfaction campaign.

Separately, for each such claim, state the following information:

- Honda's claim number;
- Vehicle owner or fleet name (and fleet contact person) and telephone number;
- VIN;
- Repair date;
- Vehicle mileage at time of repair;
- Repairing dealer's or facility's name, telephone number, city and state or ZIP code;
- Labor operation number;
- Problem code;

- i. Replacement part number(s) and description(s);
- j. Concern stated by customer; and
- k. Comment, if any, by dealer/technician relating to claims and/or repair.

Provide this information in Microsoft Access 2000, or a compatible format, entitled "WARRANTY DATA." See Enclosure 1, Data Collection Disc, for a pre-formatted table which provides further details regarding this submission.

Response: There are no warranty claims for subject vehicle with alleged defect. We are not submitting an Access table titled "WARRANTY DATA."

Model	Model Year	Warranty	Goodwill	Extended Warranty
Civic CNG	1998	0	0	0
	1999	0	0	0
	2000	0	0	0
	2001	0	0	0
	2002	0	0	0
	2003	0	0	0
	2004	0	0	0
	2005	0	0	0
	2006	0	0	0
	2007	0	0	0
Total		0	0	0

Source(s): Warranty claim data
As of: June 30, 2007

6. Describe in detail the search criteria used by Honda to identify the claims identified in response to Request No. 4, including the labor operations, problem codes, part numbers and any other pertinent parameters used. Provide a list of all labor operations, labor operation description, problem codes, and problem code descriptions applicable to the alleged defect in the subject vehicles. State, by model year, the terms of the new vehicle warranty coverage offered by Honda on the subject vehicles (i.e., the number of months and mileage for which coverage is provided and the vehicle systems that are covered). Describe any extended warranty coverage option(s) that Honda offered for the subject vehicles and state by option and model year, the number of vehicles that are covered under each such extended warranty.

Response:

Search Criteria: Using 1998-2007 Civic CNG warranty data, zero claims were pulled based on the search terms fire, explosion, explode or burst.

Coding and descriptions: There are no labor operation codes, labor operation descriptions, problem codes or problem code descriptions to list.

Warranty Coverage:

The 1998-2007 Civic GX (CNG) is covered by a new vehicle limited warranty for three years or 36,000 miles, whichever comes first. Under the terms of the new vehicle limited warranty, Honda will repair or replace any part that is defective in material or workmanship under normal use. This warranty covers all systems except emission control systems, accessories, battery or tires, which have their own warranties. Powertrain has its own warranty beginning with the 2006-07 model year.

Honda has not issued extended warranty coverage related to the alleged defect in the subject vehicles.

Source(s): Warranty claim data
As of: June 30, 2007

7. **Produce copies of all service, warranty, and other documents that relate to, or may relate to, the alleged defect in the subject vehicles, that Honda has issued to any dealers, regional or zone offices, field offices, fleet purchasers, or other entities. This includes, but is not limited to, bulletins, advisories, informational documents, training documents, or other documents or communications, with the exception of standard shop manuals. Also include the latest draft copy of any communication that Honda is planning to issue within the next 120 days.**

Response: There are no service, warranty or other related documents issued by Honda to submit.

Source(s): Customer Relations, Tech Line, Field Reports, Claims and Lawsuits.
As of: June 30, 2007

8. **Describe all assessments, analyses, tests, test results, studies, surveys, simulations, investigations, inquiries and/or evaluations (collectively, "actions") that relate to, or may relate to, the alleged defect in the subject vehicles that have been conducted, are being conducted, are planned, or are being planned by, or for, Honda. For each such action, provide the following information:**
 - a. Action title or identifier;
 - b. The actual or planned start date;
 - c. The actual or expected end date;
 - d. Brief summary of the subject and objective of the action;
 - e. Engineering group(s)/supplier(s) responsible for designing and for conduction the action; and
 - f. A brief summary of the findings and/or conclusions resulting from the action.

For each action identified, provide copies of all documents related to the action, regardless of whether the documents are in interim, draft, or final form. Organize the documents chronologically by action.

Response: This information is being compiled and will be submitted in our final response on or before Sept. 3, 2007

9. Describe all modifications or changes made by, or on behalf of, Honda in the design, material composition, manufacture, quality control, supply, or installation of the subject components from the start of production to date, which relate to, or may relate to, the alleged defect in the subject vehicles. For each such modification or change, provide the following information:
- The date or approximate date on which the modification or change was incorporated into vehicle production;
 - A detailed description of the modification or change;
 - The reason(s) for the modification or change;
 - The part numbers (service and engineering) of the original component;
 - The part number (service and engineering) of the modified component;
 - Whether the original unmodified component was withdrawn from production and/or sale, and if so, when;
 - When the modified component was made available as a service component; and
 - Whether the modified component can be interchanged with earlier production components.

Also, provide the above information for any modification or change that Honda is aware of which may be incorporated into vehicle production within the next 120 days.

Response: This information is being compiled and will be submitted in our final response on or before Sept. 3, 2007

10. Produce one sample of each of the following:
- An exemplar sample of each version of PRD used in the subject vehicles;
 - A quarter-sectioned cutaway sample of each version of PRD used in the subject vehicles; and
 - Any kits that have been released, or developed, by Honda for use in service repairs to the subject components/assembly which relate, or may relate, to the alleged defect in the subject vehicles.

Response: This information is being compiled and will be submitted in our final response on or before Sept. 3, 2007

11. State the component name and part number (both service and engineering/production) for each version of the subject components.

Response: This information is being compiled and will be submitted in our final response on or before Sept. 3, 2007

12. Provide a technical description of each subject component used in the subject vehicles. Include a simple skelton diagram of each vehicle that uses each subject component, identifying and showing the location of the various components of the CNG assembly, including, but not limited to, the CNG tank and the PRD. Explain and furnish details of all safeguards included in the subject components that are designed to protect against the bursting of the CNG tank or the failure of the PRD.

Response: This information is being compiled and will be submitted in our final response on or before Sept. 3, 2007

13. Furnish Honda's assessment of the alleged defect in the subject vehicle, including:
- a. The causal or contributory factor(s);
 - b. The failure mechanism(s);
 - c. The failure mode(s);
 - d. The risk to motor vehicle safety that it poses;
 - e. What warnings, if any, the operator and the other persons both inside and outside the vehicle would have that the alleged defect was occurring or a subject component was malfunctioning; and
 - f. The reports included with this inquiry.

Response: This information is being compiled and will be submitted in our final response on or before Sept. 3, 2007

14. Furnish a copy of all documents not specifically requested herein, which Honda believes are relevant to, or which were used in formulating its assessment of, the alleged defect.

Response: This information is being compiled and will be submitted in our final response on or before Sept. 3, 2007

Sincerely,

AMERICAN HONDA MOTOR CO., INC.



William R. Willen
Managing Counsel
Product Regulatory Office

WRW:nis