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PE07-060

January 31, 2008

OFFICE OF DEFECTS  
INVESTIGATION

Mr. Thomas Z. Cooper, Chief  
Vehicle Integrity 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. Cooper:

In reply to your letter dated December 4, 2007, we are submitting a final response regarding windshield wiper system failures in MY 2004 Acura TL vehicles.

1. State, by model and model year, the number of subject vehicles Honda has manufactured for sale or lease in the United States. Separately, for each subject 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."

Response:

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

Model	Model Year	Sales
TL	2004	75,984

Source(s): Production records  
As of: Dec. 10, 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 vehicle, property damage claims, consumer complaints, or field reports;
- d. Property damage claims, alleged to have resulted from failure of the subject component;
- e. Third-party arbitration proceedings where Honda is or was a party to the arbitration; and
- f. Lawsuits, both pending and closed, in which Honda is or was a defendant or codefendant.

For subparts "a" through "c" 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 "f," provide a summary listing 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 "e" and "f," identify the parties to the action, as well as the caption, court, docket number, and date on which the complaint or other document was filed to initiate the action.

Response:

The total number of reports for items "a" through "f" are stated in the table below. Honda does not have any TL fleet vehicles.

Model	Model Year	A Owner/Fleet Reports	B Field/Dealer Reports	C Crash, Injury, Fatality Reports	D Property Damage	E Third Party Arbitration	F Lawsuits
TL	2004	39	33	0	0	0	0

Items "c" to "f": Honda did not identify any relevant reports in its review.

Source(s): Customer Relations, Tech Line, Field Reports, Claims and Lawsuits  
 As of: Jan. 11, 2008

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:
  - a. The category of the item, as identified in Request No. 2 (i.e., consumer complaint, field report, etc.);
  - b. Vehicle owner or fleet name (and fleet contact person), address, and telephone number;
  - c. Vehicle's VIN;
  - d. Vehicle's make, model and model year;
  - e. Vehicle's mileage at time of incident;
  - f. Incident date;
  - g. Report or claim date;
  - h. Whether a crash is alleged;
  - i. Whether a fire is alleged;
  - j. Whether property damage is alleged;
  - k. Number of alleged injuries, if any; and
  - l. Number of alleged fatalities, if any.

Provide this information in Microsoft Access 2000, or a compatible format, entitled "REQUEST NUMBER TWO DATA."

Response:

The data elements "a" through "l" are filed on the enclosed CD.

Source(s): Customer Relations, Tech Line, Field Reports, Claims and Lawsuits  
As of: Jan. 11, 2008

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 #Q4 on enclosed CD.

The documents are organized by category and within each category by the last six digits of the VIN.

Source(s): Customer Relations, Tech Line, Field Reports, Claims and Lawsuits  
As of: Jan. 11, 2008

5. State, by model and 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 alleged defect 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:

- a. Honda's claim number;
- b. Vehicle owner or fleet name (and fleet contact person) and telephone number;
- c. VIN;
- d. Repair date;
- e. Vehicle mileage at time of repair;
- f. Repairing dealer's or facility's name, telephone number, city and state or ZIP code;
- g. Labor operation number;
- h. 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."

Response:

The data elements "a" through "k" are filed on the enclosed CD.

Model	Model Year	Warranty Claims	Goodwill Claims	Extended Warranty	Vehicle Service Contract
TL	2004	2657	220	0	0

Source(s): Warranty claim data  
As of: Jan. 18, 2008

6. Describe in detail the search criteria used by Honda to identify the claims identified in response to Request No. 5, 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 make and 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, model, and model year, the number of vehicles that are covered under each such extended warranty.

Response:

Search Criteria: Using 2004 TL warranty data, claims were pulled based on the windshield wiper motor part number. The contention text description was reviewed for each claim to identify windshield wiper motor failure.

Coding and Descriptions: See Attachment #6

Warranty Coverage: The 2004 Acura TL is covered by a new vehicle limited warranty for four years or 50,000 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. Honda has not issued extended warranty coverage related to the alleged defect in the 2004 Acura TL.

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 issued within the next 120 days.

Response:

Honda has not issued any service information related to the alleged defect.

8. Describe all assessments, analyses, tests, test results, studies, surveys, simulations, investigations, inquiries and/or evaluation (collectively, "action") 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:
- Action title or identifier;
  - The actual or planned start date;
  - The actual or expected end date;
  - Brief summary of the subject and objective of the action;
  - Engineering group(s)/supplier(s) responsible for designing and for conducting the action; and
  - 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: To be submitted

9. Describe all modification or changes made by, or on behalf of, Honda in the design, material composition, manufacture, quality control, supply, or installation of the subject component, 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 of change;
  - The reason(s) for the modification or change;
  - The part number(s) (service and engineering) of the original component;
  - The part number(s) (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: To be submitted

10. Identify and tabulate by vehicle MY, made, and mode, all other vehicles produced by Honda for sale or lease in the United States, equipped with the identical subject windshield wiper motor. For each vehicle group identified, state the affected vehicle population, as well as separate counts of the respective numbers of consumer complaints and field reports from all sources, received by Honda or of which Honda is aware, that relate to the alleged defect.

Response: To be submitted

11. State the number of windshield wiper drive motors, or parts kits including the subject drive motor, sold by Honda as authorized replacement parts of kits for installation in the subject vehicles. Identify by engineering and service part number(s), each such replacement motor or kit. State the date(s) on which each such motor or kit was released by Honda for replacement installations and the date(s).

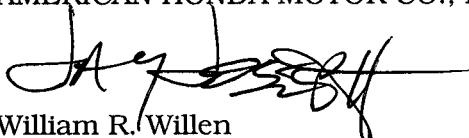
Response: To be submitted

12. Furnish Honda's assessment of the alleged defect in the subject vehicle, including;
- The causal or contributory factor(s);
  - The failure mechanism(s);
  - The failure mode(s);
  - The risk to motor vehicle safety that it poses;
  - 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 subject component was malfunctioning; and
  - The reports included with this inquiry.

Response: To be submitted

Sincerely,

AMERICAN HONDA MOTOR CO., INC.

  
William R. Willen  
Managing Counsel  
Product Regulatory Office

JAY JOSEPH  
ON BEHALF  
OF BILL WILLEN

WRW:nis

Attachments

# Attachment #6

Attachment #6  
Labor Operation and Problem Code Descriptions

<b>Labor Operation Codes</b>	<b>Labor Operation Descriptions</b>
612120	BLOWER MOTOR - REPLACE.
710199	BATTERY - STRAIGHT TIME (WITH PARTS)
723505	CODES/OPERATING DATA - RETRIEVE OR CLEAR CODES WITH PGM TESTER. ACCESS SYSTEM OPERATING DATA WITH PGM TESTER. ACCESS FLASH CODES WITH SRS INDICATOR LIGHT. PERFORM INPUT TEST.
728099	TURN SIGNAL SWITCH - STRAIGHT TIME (WITHOUT PARTS)
728130	WIPER SWITCH - REPLACE.
728199	TURN SIGNAL SWITCH - STRAIGHT TIME (WITH PARTS)
737150	FUSE - REPLACE ONE OR MORE.
740097	PARTS ONLY FRONT WIPER MOTOR
740099	FRONT WIPER MOTOR - STRAIGHT TIME (WITHOUT PARTS)
740100	WIPER MOTOR, FRONT - REPLACE.
740110	WIPER ARM, FRONT; ONE OR BOTH - REPLACE.
740115	WIPER LINKAGE, FRONT - REPLACE.
740199	FRONT WIPER MOTOR - STRAIGHT TIME (WITH PARTS)
741099	REAR WIPER MOTOR - STRAIGHT TIME (WITHOUT PARTS)
741199	REAR WIPER MOTOR - STRAIGHT TIME (WITH PARTS)
742100	WASHER PUMP MOTOR (FRONT OR REAR) - REPLACE.
742199	FRONT AND REAR WASHERS - STRAIGHT TIME (WITH PARTS)
744100	POWER WINDOW/VENT SWITCH, LEFT FRONT; INCLUDING CONTROL UNIT - REPLACE
744170	POWER WINDOW/VENT MOTOR, RIGHT FRONT - REPLACE.
745099	ELECTRICAL TEST - STRAIGHT TIME (WITHOUT PARTS)
745199	ELECTRICAL TEST - STRAIGHT TIME (WITH PARTS)
745509	SWITCH/CIRCUIT - DIAGNOSIS OR INPUT TEST.
746199	INTEGRATED SWITCH - STRAIGHT TIME (WITH PARTS)
747100	FUSE BOX - REPLACE.
747105	UNDER-HOOD FUSE BOX - REPLACE.
747199	FUSE BOX - STRAIGHT TIME (WITH PARTS)



Attachment #6  
Labor Operation and Problem Code Descriptions

<b>Problem Code</b>	<b>Problem Code Descriptions</b>
012	WEAK OR FATIGUED
032	INOOPERATIVE
063	INADEQUATE WIPER BLD
00101	DEFORMED
00201	BENT
00503	WEAR (OTHER THAN TIRE, BRAKE PAD / SHOE
01001	POORLY PLATED, PLATING PEELING OFF
01201	NOT WORKING PROPERLY OR AT ALL
01801	BROKEN
02101	TORN OR SPLIT
03202	DOES NOT MOVE FORWARD
03203	PGM-FI (MIL) LAMP LIT
03205	CHECK OR INDICATOR LAMP LIT (EXCEPT PGM-FI(MIL)
03212	ABNORMAL SOUND (EXCLUDING AUDIO SYSTEM)
03214	ERRONEOUS OPERATION
03217	NOT OPERATING
03218	ERRATIC MOVEMENT
03219	UNABLE TO CONTROL MIDWAY
03220	NOT OPERATING PROPERLY
03227	DOES NOT ILLUMINATE
03275	AFFECTED BY NOISE
04201	ABNORMAL SOUND
04907	INSUFFICIENT PEDAL STROKE
06301	INSUFFICIENT WIPER BLADE EFFECT
06401	SHORT CIRCUIT
06404	FUSE BURNED OUT