

# HONDA

American Honda Motor Co., Inc.  
1919 Torrance Boulevard  
Torrance, CA 90501-2746  
Phone (310) 783-2000

November 24, 2008

Office of the Chief Counsel  
U.S. DEPT. OF TRANSPORTATION  
National Highway Traffic Safety  
Administration  
1200 New Jersey Ave., SE  
Washington, DC 20590

**Re: RQ08-006 (2002-03 Honda Accord Ignition Interlock)  
Request for Confidentiality**

Dear Chief Counsel:

Enclosed herewith is a Request for Confidentiality submitted for your review and consideration.

Specifically, we are requesting confidentiality for the following documents in our response to Question 8: Document 1 (entire), Document 2 (QIS and QIC reports only), Document 3 (p. 2-4, 14-16, 36, 43), Document 4 (entire), Document 5 (p.2) and Document 6 (QIS and QIC reports). The attachments are proprietary data containing information regarding internal assessments and analyses, design and performance specifications, modification changes, associate names, VINS, engine numbers and transmission numbers. As such, the disclosure of this information would result in significant competitive damage to American Honda Motor Co., Inc. Therefore, we are requesting confidential treatment in accordance with the provisions of 5 U.S.C. 552(b)(4).

If you need any additional information regarding this matter, please let me know. We appreciate your consideration and look forward to your decision.

Very truly yours,

AMERICAN HONDA MOTOR CO., INC.



William R. Willen  
Managing Counsel  
Product Regulatory Office

WRW:nis

Enclosure

California Jurat

State of California

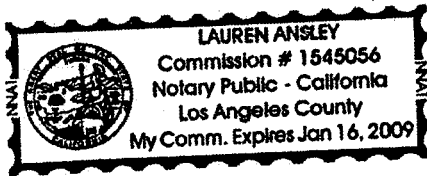
County of Los Angeles } ss.

Subscribed and sworn to (~~or affirmed~~) before me on 24th day of Nov  
Month

2008 , by William R. Willen and  
Year Name of Signer

\_\_\_\_\_, proved to me on the basis  
Name of Signer (if any)

of satisfactory evidence to be the person (s) who appeared before me.



(seal)

Lauren Ansley  
Signature of Notary Public

(Optional) My commission expires on.: 1/16/09

(Optional) Phone No.: \_\_\_\_\_

# HONDA

American Honda Motor Co., Inc.  
1919 Torrance Boulevard  
Torrance, CA 90501-2746  
Phone (310) 783-2000

November 24, 2008

NVS-213swmc  
RQ08-006

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 September 24, 2008, we are submitting our response to Q8-Q13 regarding allegations of malfunctioning ignition shft-park interlock systems in MY 2002-2003 Honda Accord vehicles. We are also including our responses to Q1-Q7 which were submitted on November 7. Please note that attachments or data provided in Access tables on November 7 are not included in this response.

The documents submitted in response to Question 8 are being submitted with a request for confidentiality for the reasons noted on the affidavit accompanying the request to the Chief Counsel's Office.

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. Model Year;
  - c. Date of manufacture;
  - d. Date warranty coverage commenced; and
  - e. 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 that provides further details regarding this submission.*

Response:

Model	Model Year	Sales
Accord	2002	356,604
	2003	428,222

Source(s): Production records  
As of: Oct. 18, 2008

OFFICE OF DEFECTS INVESTIGATION  
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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:
- Consumer complaints, including those from fleet operators;
  - Field reports, including dealer field reports;
  - 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;
  - 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;
  - Property damage claims; and
  - Third-party arbitration proceedings where Honda is or was a party to the arbitration; and
  - 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: See Attachment #Q2

The total number of reports for items "a" through "g" are stated in the table below.  
 Note: Honda does not have any Accord fleets.

Model	Model Year	A Owner/ Fleet Reports	B Field/ Dealer Reports	C Crash, Injury, Fatality Reports	E Fire	E Property Damage	F Third-Party Arbitration	G Lawsuits
Accord	2002	7	0	2	0	0	0	0
	2003	23	6	8	0	3	0	0

Source(s): Customer Relations, Tech Line, Field Reports, Claims and Lawsuits.  
 As of: Oct. 17, 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:
- Honda's file number or other identifier 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 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;

- k. Whether property damage is alleged;
- l. Number of alleged injuries, if any; and
- m. 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 that 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: Oct. 17, 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*

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

Source(s): Customer Relations, Tech Line, Field Reports, Claims and Lawsuits.  
As of: Oct. 17, 2008

- 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 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. Model Year;
- e. Repair date;
- f. Vehicle mileage at time of repair;
- g. Repairing dealer's or facility's name, telephone number, city and state or ZIP code;
- h. Labor operation number;
- i. Problem code;
- j. Replacement part number(s) and description(s);
- k. Concern stated by customer; and
- l. 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 that provides further details regarding this submission.

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

Model	Model Year	Warranty Claims	Goodwill Claims	Extended Warranty	Service Bulletin/Campaign
Accord	2002	10	7	0	0
	2003	53	22	0	0

Source(s): Warranty claim data  
As of: Oct. 17, 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 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 2002-2003 Accord warranty data, claims were pulled based on the steering lock assembly part numbers. VINs affected by campaign 05V-025 were excluded. The contention text description was manually reviewed for each claim to identify relevant claims.

Coding and Descriptions: *See Attachment #Q6*

Warranty Coverage: The 2002-2003 Accord 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. Honda has not issued extended warranty coverage related to the alleged defect in the 2002-2003 Accord.

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 other service information since publishing Service Bulletin 05-007 Safety Recall: Ignition Key is Removable with the Shift Lever Out of Park (3/2/05) which is associated with campaign 05V-025.

Currently no communication is planned within the next 120 days.

8. Describe all assessments, analyses, tests, test results, studies, surveys, simulations, investigations, inquiries and/or evaluation (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:
- 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:

The summaries below describe the six documents found in Attachment #Q8:

**Document 1: Quality Improvement Sheet (QIS) – Requesting Confidentiality**

- Action title or identifier:** QIS (SCWA-030618-04)
- The actual or planned start date:** June 18, 2003
- The actual or expected end date:** August 9, 2005
- Brief summary of the subject and objective of the action:** Analysis of the cause of the failure using the actual part that failed in the market.
- Engineering group(s)/supplier(s) responsible for designing and for conducting the action:** The quality analysis is based on and being conducted by internal design requirements within the Honda Manufacturing of America (HAM) Market Quality (MQ) Department and Honda Lock, the supplier of this component.
- A brief summary of the findings and/or conclusions resulting from the action:** The analysis of this failed part and subsequent discussion with the consumer resulted in the determination that this part failed due to a combination of unusual customer usage and insufficient design for this mode of usage. The customer described the conditions of use that resulted in damage to the interlock tab within the ignition lock cylinder, allowing the key to be removed when the gear selector is not in the Park position.

**Document 2: Quality Improvement Sheet (QIS) – Requesting Confidentiality**

- Action title or identifier:** QIS (MV20040426180508)
- The actual or planned start date:** April 26, 2004
- The actual or expected end date:** April 7, 2005
- Brief summary of the subject and objective of the action:** Analysis of the cause of the failure using the actual part that failed in the market.
- Engineering group(s)/supplier(s) responsible for designing and for conducting the action:** The quality analysis was based on and being conducted by internal design requirements within the Honda Automobile Quality Analysis Office and Honda Lock, the supplier of this component.
- A brief summary of the findings and/or conclusions resulting from the action:** Through the analysis conducted on this part it was concluded that this failure was the result of manufacturing variation on the ignition lock cylinder interlock mechanism.

**Document 3: Quality Committee report – *Requesting Confidentiality***

- a. **Action title or identifier:** Quality Committee presentation
- b. **The actual or planned start date:** Reported to Quality Committee January 20, 2005
- c. **The actual or expected end date:** Reported to Quality Committee January 20, 2005
- d. **Brief summary of the subject and objective of the action:** This presentation was provided to the Quality Committee to consider the need for a market action in the previous campaign, resulting in NHTSA recall 05V-025.
- e. **Engineering group(s)/supplier(s) responsible for designing and for conducting the action:** This analysis was conducted by the Automobile Quality Innovation Division (AQID) based on internal quality and design guidelines.
- f. **A brief summary of the findings and/or conclusions resulting from the action:** Based on this presentation and the results of parts investigations it was determined that market action was necessary, resulting in NHTSA recall 05V-025.

**Document 4: Quality Improvement Sheet (QIS) – *Requesting Confidentiality***

- a. **Action title or identifier:** QIS (S84C-070125-07)
- b. **The actual or planned start date:** January 25, 2007
- c. **The actual or expected end date:** Analysis is continuing at this time, no end date has been set.
- d. **Brief summary of the subject and objective of the action:** Analysis of the cause of the failure using the actual part that failed in the market.
- e. **Engineering group(s)/supplier(s) responsible for designing and for conducting the action:** The quality analysis is based on and being conducted by internal design requirements within the Honda Manufacturing of America (HAM) Market Quality (MQ) Department and Honda Lock, the supplier of this component.
- f. **A brief summary of the findings and/or conclusions resulting from the action:** This activity is continuing at this time. No conclusion can be provided until this analysis has been completed.

**Document 5: "Interlock key slip out (SV4 Type) Investigation Results" – *Requesting Confidentiality***

- a. **Action title or identifier:** Interlock key slip out (SV4 Type) Investigation Results
- b. **The actual or planned start date:** May 18, 2007
- c. **The actual or expected end date:** May 18, 2007
- d. **Brief summary of the subject and objective of the action:** This document is an analysis of a failed part from a 2002 model year Honda Accord produced after the end date of the recall range for recall 05V-025.
- e. **Engineering group(s)/supplier(s) responsible for designing and for conducting the action:** The analysis was conducted by the Honda Manufacturing of America (HAM) Market Quality (MQ) Department and the supplier of this component, Honda Lock, based on internal and supplier design requirements.
- f. **A brief summary of the findings and/or conclusions resulting from the action:** The conclusion of this report was that this failure resulted from a combination of excessive force being applied to the ignition lock cylinder and turning the ignition switch while applying excessive and unusual pushing or pulling force to the ignition switch against the axis of rotation of the ignition switch.

**Document 6: Quality Improvement Sheet (QIS) – *Requesting Confidentiality***

- a. **Action title or identifier:** QIS (MV20081112093123)
- b. **The actual or planned start date:** November 12, 2008
- c. **The actual or expected end date:** Analysis is continuing at this time, no end date has been set.



- d. **Brief summary of the subject and objective of the action:** Analysis of the cause of the failure using the actual part that failed in the market.
  - e. **Engineering group(s)/supplier(s) responsible for designing and for conducting the action:** The quality analysis is based on and being conducted by internal design requirements within the Honda Manufacturing of America (HAM) Market Quality (MQ) Department and Honda Lock, the supplier of this component.
  - f. **A brief summary of the findings and/or conclusions resulting from the action:** This activity is continuing at this time. No conclusion can be provided until this analysis has been completed.
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:
- a. The date or approximate date on which the modification or change was incorporated into vehicle production;
  - b. A detailed description of the modification of change;
  - c. The reason(s) for the modification or change;
  - d. The part number(s) (service and engineering) of the original component;
  - e. The part number(s) (service and engineering) of the modified component;
  - f. Whether the original unmodified component was withdrawn from production and/or sale, and if so, when;
  - g. When the modified component was made available as a service component; and
  - h. 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:

Certain 2002 model year Accord vehicles manufactured at the Honda Sayama factory in Saitama, Japan were included in the 05V-025 campaign due to the similarity of the ignition interlock system to the rest of that recall population. However, 2002 model year Accord vehicles manufactured at Honda of America Manufacturing (HAM) in Marysville, Ohio were excluded from campaign 05V-025 because the components showed lower dimensional variation from manufacturing than the variation of those included in the campaign due to the difference in combination of the parts.

The design specification for all Accord ignition interlock systems changed at the beginning of the 2003 model year, as this model year marked the introduction of a new design for the Honda Accord. The ignition lock interlock system was redesigned again during the middle of the 2003 model year.

- a. The specification changed in August 2002, at the start of mass production of the new 2003 model year Honda Accord. The specification changed again in January 2003, during the middle of the 2003 model year.
- b. The August 2002 change comprised of a new ignition lock assembly, coincident with the start of production of the new 2003 model year Accord (see Attachment #Q9b). In January 2003 the ignition lock specification was changed again, specifically the press fit height of the shaft on which the interlock lever is located was changed to improve the lever response and help assure proper operation of the ignition interlock system.
- c. The August 2002 design change was implemented to reduce the overall weight of the ignition switch and lock assembly and reduce the total number of parts. The January 2003 design

change was intended to improve the function of the lever, specifically to improve the lever response to assure proper function.

- d. The service and engineering part numbers of the original components are the same:  
06350-S84-XXX (key cylinder set)  
35100-S84-XXX (Steering lock assembly) } See Attachment #Q9d
  - e. The service and engineering part numbers of the modified components are the same:  
06350-SDA-XXX (key cylinder set)  
35100-SDA-XXX (Steering lock assembly) } See Attachment #Q9e
  - f. Production of the original components (06350-S84-XXX and 35100-S84-XXX) as mass production parts were discontinued in August of 2002. Production of original components (06350-SDA-XXX and 35100-SDA-XXX) as service parts continues at this time.
  - g. The modified components (06350-SDA-XXX and 35100-SDA-XXX) became available in August 2002. The further modified parts became available in January 2003.
  - h. The components from a 2003 model year Accord cannot be interchanged with vehicles produced prior to August 2002. However, all parts ignition lock assemblies for the 2003 model year Accord produced after August 2002, including those with the January 2003 design modifications, are interchangeable.
10. Produce *one* of each of the following:
- a. Exemplar samples of each design version of the subject component;
  - b. Field return samples of the subject component exhibiting the subject failure mode; and
  - c. Any kits that have been released, or developed, by Honda for use in service repairs to the subject component/assembly which relate, or may relate, to the alleged defect in the subject vehicles.

Response:

- a. Will be sent under separate cover.
  - b. Will be sent under separate cover.
  - c. No repair kits have been released or developed by Honda.
11. State the number of each of the following that Honda has sold that may be used in the subject vehicles by component name, part number (both service and engineering/production), and model year of the vehicle in which it is used and month/year of sale (including the cut-off date for sales, if applicable):
- a. Subject component; and
  - b. Any kits that have been released, or developed, by Honda for use in service repairs to the subject component/assembly.

For each component part number, provide the supplier's name, address, and appropriate point of contact (name, title, and telephone number). Also identify by make, model and model year, any other vehicles of which Honda is aware that contain the identical component, whether installed in production or in service, and state the applicable dates of production or service usage.

Response:

- a. See Attachment #Q11
- b. No repair kits have been released or developed by Honda.

Supplier Contact Information

HL-A Co., INC.  
902 Ravenwood Dr.  
Selma, AL 36701  
Vice President: Ichiro Nagatomo  
Plant Manager: Dennis Moore  
(334) 874-9010

Honda Lock Mfg.Co., Ltd. R&D Center  
535-14 Ishizue, Takanezawamachi,  
Shioya, Tochigi 329-1225 Japan  
Quality Anaiysis Div. General Manager: Osamu Sakuragi  
+81 50 3757 5667  
Quality Anaiysis Div. Manager: Manabu Urayama  
+81 50 3757 5667

12. Provide the following information regarding the subject recalls:
- The basis for the scope of each recall and the reason(s) Recall 05V-025 did not include all MY2002 Accord vehicles;
  - A comparison of the failure statistics for each of the recall populations when each recall decision was made by Honda (complaints, field reports, warranty claims, survey data or other information used by Honda to assess failure frequencies). Include total failures/incidents, crashes and injuries and give the data by recall, model and model year;
  - Describe all design and/or material differences related to the production of the subject component at different production facilities, both before and after the production range included in 05V-025; and
  - A detailed description, with diagrams as necessary, of all changes made to the interlock lever and any other components as part of the recall remedy for 05V-025.

Response:

- Campaign 05V-025 included 2002 model year Accord vehicles manufactured at the Honda Sayama factory in Saitama, Japan because the ignition interlock systems in those vehicles exhibited the same degree of dimensional variation as those of the other vehicles included in that campaign. In contrast, 2002 Honda Accord vehicles manufactured at HAM exhibited less dimensional variation than the vehicles included in the campaign population, and were excluded from that campaign.
- Attachment #Q8, Document 3, titled "Quality Committee Report" includes the requested comparison of failure rates for the different recall populations and vehicles involved in campaign 05V-025.
- The design of the 2002 model year ignition interlock systems did not change as a result of campaign 05V-025 for Honda Accord models produced at the Honda Sayama factory in Japan or Accord vehicles produced at HAM. The supplier of these components for 2002 model year Accord vehicles utilized the same design drawings, however the production tolerance variation of the products received from Honda Lock at the Honda Sayama factory were improved. No changes were made to the ignition interlock systems for 2002 model year Accord vehicles manufactured at HAM before or after campaign 05V-025. All Honda Accord ignition interlock systems were changed to a new design for the 2003 model year as a result of an overall design change to the 2003 model year Accord (see Attachment #Q9b). In January, 2003 the specification for installing the press-fit shaft that locates and retains the interlock lever was changed increase the shaft height, assuring that it is installed shallower

into the ignition lock housing. This specification change was made to help assure proper lever function throughout the useful life of the vehicle.

- d. Please see Attachment #Q9b for illustrations showing the design and specification changes made to the ignition interlock system as a result of campaign 05V-025.

**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 subject component was malfunctioning; and
- f. The reports included with this inquiry.

Response:

Due to the differences in design and materials between the 2002 model year and 2003 model year components included in this inquiry, we are responding to each model year separately.

**2002 MY**

- a. When the ignition key is rotated forcibly while the interlock system is preventing the ignition key from being removed, then the interlock engagement lever gradually wears down. This gradual wear condition decreases the margin of this lever over time until the interlock device is no longer able to prevent the ignition key from being removed when the transmission gear selector is in any position other than park.
- b. Please refer to Attachment #Q13b for diagrams that illustrate the failure mechanisms for the 2002 and 2003 Accord models respectively.
- c. The failure mode is that the ignition key interlock system no longer prevents the ignition key from being removed when the transmission gear selector is in any position other than park.
- d. If this condition exists and the driver attempts to remove the ignition key when the transmission gear selector is in a position other than park, and the parking brake has not been set, the vehicle may roll out of the position where it was stopped.
- e. There are no warnings to the driver that this condition may exist.
- f.

NHTSA VOQ Ref. No.	VIN	Assessment
10119372	JHMCG66512C000748	Information is insufficient to judge whether it is related to this inquiry or not (Failure part not confirmed)
10178828	1HGCG22502A036167	This contact is related to this inquiry (See Attachment #Q8-Document 5)
10198723	1HGCG66892A157887	Information is insufficient to judge whether it is related to this inquiry or not (Failure part not confirmed)
10201918	1HGCG16572A038308	Information is insufficient to judge whether it is related to this inquiry or not (Failure part not confirmed)
10218153	1HGCG22592A005340	Information is insufficient to judge whether it is related to this inquiry or not (Failure part not confirmed)
10234222	1HGCG165X2A013547	Information is insufficient to judge whether it is related to this inquiry or not (Failure part not confirmed)

**2003 MY**

- a. A solenoid is used to activate the interlock lever within the interlock device. If the ignition key is rotated forcibly when the interlock lever is engaged, electrical power to the solenoid is stopped, and the interlock lever attempts to return to the interlock OFF (disengaged) position. Then, when the key is turned slightly toward the ON direction while the lever is trying to return to its resting position, the lever is stopped in a half-engaged position.

When all of the above conditions are met and the ignition key is forcibly turned to the OFF position, the tip of the interlock lever can be damaged to the point that the interlock device is no longer effective, allowing the ignition key to be removed even if the transmission gear selector is not in the PARK position.

- b. Please refer to Attachment #Q13b for diagrams that illustrate the failure mechanisms for the 2002 and 2003 Accord models respectively.
- c. The failure mode is that the ignition key interlock system no longer prevents the ignition key from being removed when the transmission gear selector is in any position other than park.
- d. If this condition exists and the driver attempts to remove the ignition key when the transmission gear selector is in a position other than park, and the parking brake has not been set, the vehicle may roll out of the position where it was stopped.
- e. There are no warnings to the driver that this condition may exist.
- f.

NHTSA VOQ Ref. No.	VIN	Assessment
10034086	1HGCM66583A086942	Information is insufficient to judge whether it is related to this inquiry or not (Failure part not confirmed)
10111930	1HGCM66553A017450	Information is insufficient to judge whether it is related to this inquiry or not (Failure part not confirmed)
10095674	JHMCM566X3C026956	Information is insufficient to judge whether it is related to this inquiry or not (Failure part not confirmed)
10057591	1HGCM66573A033813	Information is insufficient to judge whether it is related to this inquiry or not (Failure part not confirmed)
10045968	1HGCM82673A024071	Information is insufficient to judge whether it is related to this inquiry or not (Failure part not confirmed)
10045538	1HGCM56633A097964	Information is insufficient to judge whether it is related to this inquiry or not (Failure part not confirmed)
10018284	1HGCM82253A004561	Information is insufficient to judge whether it is related to this inquiry or not (Failure part not confirmed)
10160941	JHMCM56613C039370	Information is insufficient to judge whether it is related to this inquiry or not (Failure part not confirmed)
10239601	1HGCM56633A113712	Information is insufficient to judge whether it is related to this inquiry or not (Failure part not confirmed)

Mr. Jeffrey L. Quandt  
NVS-213swmc / RQ08-006  
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If you need any additional information regarding this matter, please contact me.

Very truly yours,

AMERICAN HONDA MOTOR CO., INC.

A handwritten signature in black ink, appearing to read "William R. Willen", with a long horizontal flourish extending to the right.

William R. Willen  
Managing Counsel  
Product Regulatory Office

WRW:nis

Attachments