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NVS-212

2008 NOV 26 A 9: 07

November 21, 2008

NVS-212mjl  
EA08-015

Ms. Kathleen C. DeMeter, Director  
Office of Enforcement  
Office of Defects Investigation  
U.S. DEPARTMENT OF TRANSPORTATION  
National Highway Traffic Safety Administration  
1200 New Jersey Avenue, S.E.  
Washington, DC 20590

Dear Ms. DeMeter:

In reply to your letter dated September 22, 2008, we are submitting a partial response to questions 1-7 regarding allegations of unexpected closing of the power liftgate on 2005-07 Honda Odyssey vehicles equipped with the optional power liftgate feature.

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
Odyssey	2005	25,230
	2006	23,984
	2007	20,544

Source(s): Production records  
As of: Oct. 8, 2008

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;
- 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 "f" 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 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 "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 initiating the action was filed.

Response:            *See Attachment #Q2 for summary description of items "c" through "f"*

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

The 2005 lawsuit should have been originally reported in our PE08-026 response but was not included because of different search terms used.

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
Odyssey	2005	39	23	11	0	0	1
	2006	10	3	4	0	0	0
	2007	2	2	1	0	0	0

Source(s): Customer Relations, Tech Line, Field Reports, Claims and Lawsuits.  
 As of: Nov. 14, 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. Honda's file number or other identifier used;
  - b. The category of the item, as identified in Request No. 2 (i.e., consumer complaint, field report, etc.);
  - c. Vehicle owner or fleet name (and fleet contact person), address, and telephone number;
  - d. Vehicle's VIN;
  - e. Vehicle's make, model and model year;
  - f. Vehicle's mileage at time of incident;
  - g. Incident date;
  - h. Report or claim date;
  - i. Whether a crash 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: Nov. 14, 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, except for field reports which are organized by the last six digits of the VIN.

There were no additional field reports issued since our response to PE08-026, therefore we are submitting the same field reports that were printed on June 20, 2008.

Source(s): Customer Relations, Tech Line, Field Reports, Claims and Lawsuits.  
As of: 2/28/06

- 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
Odyssey	2005	2376	257	0	0
	2006	383	10	0	0
	2007	310	5	0	0

Source(s): Warranty claim data.  
As of: Oct. 7, 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 descriptions, 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 2005-2007 Odyssey warranty data, claims were pulled based on the tailgate strut part number. The contention text description was reviewed for each claim to identify failure of the tailgate struts to hold the tailgate in the open position or other failure or malfunction of the tailgate strut(s) or parts therein; closing of the tailgate without operator initiation, and failure of the tailgate to remain open.

Coding and Descriptions: *See Attachment #Q6*

Warranty Coverage: The 2005-2007 Odyssey 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. The powertrain warranty covers 2006-2007 Odyssey vehicles. Honda has not issued extended warranty coverage related to the alleged defect in the 2005-2007 Odyssey.

Source(s): Warranty Claim Data  
As of: Nov. 14, 2008

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

Currently no communication is planned within the next 120 days.

Source(s): Publications  
As of: Nov. 19, 2008

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. This includes but is not limited to any and all actions by the subject component manufacturer relating to the alleged defect. 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. If an action is not complete, provide a detailed schedule for the work to be done, tentative findings and/or conclusions, and provide an update within 10 days of completion of the action.

Response: To be submitted

9. Describe all modifications or changes made by or on behalf of Honda (e.g., by a supplier) in the design, material composition, manufacture, quality control, supply, or installation of the subject component, from the start of production of the subject component for the MY2005 and/or later subject vehicles to the date of this letter. 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;

- 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: To be submitted

10. Describe the modifications that relate to the increase in deburring time for the strut rod guide and the addition of a radius at the rod guide, which are referred to, but not described in any detail, in Honda's response dated August 4, 2008, to the ODI's information request letter dated April 30, 2008. For each of these modifications, 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 or change;
  - c. The reason(s) for the modification or change;
  - d. The part number(s) (engineering and service) of the original component;
  - e. The part number(s) (engineering and service) 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.

Response: To be submitted

11. Explain why the stroke durability requirement (i.e., the number of extend/compress cycles) for the subject component shown in Drawing No. 74820-SHJ-A611-M1 is different than the number of design usage cycles stated in Honda's response dated August 4, 2008, to the ODI's information request letter dated April 30, 2008.

Response: To be submitted

12. Describe in detail the operation of the liftgate system in the subject vehicles when equipped with struts that cannot support the liftgate in the open position. In your description, discuss how the system operates for different lifting forces provided by the struts (e.g., 20, 35, 50, and 75 percent of the full lifting force provided by a pair of new struts) and include nominal closing speed threshold (including tolerances) required to activate the power-close feature. Your response should include, but is not limited to a discussion of the operation of the liftgate system when the liftgate is closing at speeds below the nominal closing speed threshold required to activate the power-close feature.

Response: To be submitted

13. Describe the specifications of the jam protection sensor that senses the speed of the power liftgate motor and reverses the motor operation when it senses a change in motor speed. Describe the motor mechanism and how it detects a change in motor speed and what change of speed is required to activate the sensor. Also, furnish the nominal force (including its tolerances) required to reverse the motor operation by the pinch protection sensor.

Response: To be submitted

14. Describe all test procedures and test results that relate to liftgate closing speed and force measurements on the subject vehicles when equipped with struts that cannot support the liftgate in the open position.

Response: To be submitted

15. Produce copies of all documents that relate to your response to Request Nos. 12, 13, and /or 14.

Response: To be submitted

16. State, by model year, all part numbers of the subject components that have been installed on subject vehicles as assembled by Honda. State, by model year, the service part numbers of the subject components Honda designates for installation on subject vehicles. State, by month, year, and part number, the total number of subject components sold as service parts by Honda. Identify any kits that Honda has released or developed for use in service repairs to the subject components or assembly.

For each subject component part number, provide the supplier's name, address, and point of contact used by Honda (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: To be submitted

17. Furnish Honda's assessment of the alleged defect in the subject vehicles, including:
- The causal or contributory factor(s);
  - The failure mechanism(s);
  - The failure mode(s);
  - The failure consequence(s); i.e., the operation of the liftgate system in the subject vehicles when equipped with struts that cannot support the liftgate in the open position;
  - The risk to motor vehicle safety that it poses; and
  - 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 malfunction.

Response: To be submitted

18. Furnish copies of all communications sent from and received by Honda that relate to or may relate to the alleged defect (including the performance and durability of the subject component), including but not limited to such communications between Honda and the subject component manufacturer and between employees and/or entities within Honda (e.g., any such communication between American Honda Motor Company, Inc. and a subsidiary).

Response: To be submitted

Sincerely,

AMERICAN HONDA MOTOR CO., INC.



William R. Willen  
Managing Counsel  
Product Regulatory Office

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Attachments