

March 18, 2009

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 February 27, 2009, we are submitting additional information received since our original response on November 21, 2008 regarding allegations of unexpected closing of the power liftgate on 2005-07 Honda Odyssey vehicles equipped with the optional power liftgate feature.

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

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	0	0	0	0	0	0
	2006	0	0	0	0	0	0
	2007	0	1	0	0	0	0

Source(s): Customer Relations, Tech Line, Field Reports, Claims and Lawsuits.
 As of: March 6, 2009

2. Separately, for each item (complaint, report, claim, notice, or matter) within the scope of your response to Request No. 1, state the following information:
- Honda's file number or other identifier used;
 - The category of the item, as identified in Request No. 1 (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 property damage is alleged;
 - Number of alleged injuries, if any; and
 - 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: March 6, 2009

3. Produce copies of all documents related to each item within the scope of Request No. 1. 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 #Q3

Source(s): Customer Relations, Tech Line, Field Reports, Claims and Lawsuits.
 As of: March 6, 2009

4. 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	129	28	0	0
	2006	67	8	0	0
	2007	137	5	0	0

Source(s): Warranty claim data.
As of: March 6, 2009

5. 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 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 #Q5*

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: March 6, 2009

Sincerely,

AMERICAN HONDA MOTOR CO., INC.



William R. Willen
Managing Counsel
Product Regulatory Office

WRW:nis

Attachments

Attachment #3

Field Report

Tech Line Contact Report

T/L Ref # 2748427	Created By DAVIDK	Date Created 12/30/2008	Last Edited By DAVIDK	# of Edits 1
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Code P 7850	Original Complaint POWER TAILGATE AUTO REV OPENIN	Probable Cause/Solution HATCH STRUTS?; REPLACE
	ResIn Source: None	Date:
	Status: N/A	Mileage: 29,003

Dealer #: 207447	TZ: CST	VIN: 5FNRL38867B	Err:
Dir Cont: NICHOLAS VOSBURGH	Training %: 0	Year: 2007	Model: ODYSSEY
Serv Ph: (409) 833-7100	Extn:	Trans: 5AT	Trim: TOURR&N
Serv Mgr: DONNA FREDERICK		Doors: 5DR	WD: 2
Parts Mgr: DONNA FREDERICK		Fact: LINCOLN	Country: USA
Dir Name: MIKE SMITH HONDA 1515 I-10 SOUTH BEAUMONT TX 77701		Desc: ODYSSEY 5DR TOUR R&N 6CYL 244.0 HP 3.5 L	
Phone: (409) 833-7100	Fax #: (409) 833-1211	WhtBdy: ABS, AIR BAG, TCS, USA	
DPSM: ERIC PIZZECK	Zone/Dist: 03J	Engine #: J35A73051345	Trans #: P36A5020992
Previous Dealer/Contact	Date	Em Type: KA	
		RO #: 516456	
		Case Type: Technical	
		W.O. #:	

Tech Line Suggests

Information from Dealer

- 12/30/2008 12:57:22 PM DAVIDK**
- 1 ORIGINAL COMPLAINT
 - 2 PREVIOUS REPAIRS OR PARTS REPLACED?
 - 3
 - 4 CODES
 - 5 TRY HATCH STRUTS.

CUSTOMER STATES THE REAR HATCH DOOR
HYDROLOGICS ARE OUT
NO
REAR HATCH DOOR WILL REVERS WHEN TRYING TO
OPEN
NONE

Attachment #5

Coding and Descriptions

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Attachment #Q5
Problem Code and Description

Problem Code	Problem Code Description
00201	BENT
00401	DISTORTED
00503	WEAR (OTHER THAN TIRE, BRAKE PAD / SHOE)
00504	PREMATURE WEAR AND TEAR
01101	PERMANENT SET-IN FATIGUE
01102	DETERIORATED
01801	BROKEN
02301	SEIZED
03001	BINDING/STICKING
03214	ERRONEOUS OPERATION
03217	NOT OPERATING
06201	LOOSE (POORLY FITTED)
07403	INTERFERENCE
07404	POOR ASSEMBLY
07405	IMPROPERLY TIGHTENED
07406	IMPROPERLY ADJUSTED
07407	INSUFFICIENT SEALING MATERIAL
07408	IMPROPERLY SEALED
07409	INSUFFICIENT GREASE/OIL
07410	INSUFFICIENT OR NOT INJECTED
07801	PART(S) MISSING
08001	INCORRECT ASSEMBLY
09999	FOR PHENOMENA OTHER THAN THOSE STIPULATE

Labor Operation Number	Labor Operation Number Description
023199	DOOR-EDGE GUARD STRAIGHT TIME (WITH PARTS)
414097	FRONT DAMPER PARTS ONLY
414199	FRONT DAMPER PARTS STRAIGHT TIME (WITH PARTS)
417101	DAMPER/SHOCK ABSORBER ASSEMBLIES, BOTH REAR - REPLACE. SHOCK ABSORBERS ALONE ON 06 > CIVIC. INCLUDES ALIGNMENT.
4171B0	BUSHINGS, REAR SHOCK ABSORBERS, BOTH - REPLACE. ALIGNMENT NOT INCLUDED
721199	TRUNK LIGHT STRAIGHT TIME (WITH PARTS)
736500	SAFETY INDICATOR - INPUT TEST ONLY.
737199	WIRE HARNESS STRAIGHT TIME (WITH PARTS)
744199	POWER WINDOW SWITCHES STRAIGHT TIME (WITH PARTS)
745199	ELECTRICAL TEST STRAIGHT TIME (WITH PARTS)
748199	POWER DOOR LOCKS STRAIGHT TIME (WITH PARTS)
811097	REAR BUMPER PARTS ONLY
8111B1	STAY, REAR BUMPER RIGHT - REPLACE. (1)NOTE: SAME TIME FOR TWO UNITS (2)EXCLUDES: PAINTING COST
8111B4	STAY, REAR BUMPER BOTH - REPLACE. EXCLUDES: PAINTING COST
812199	HOOD AND RELEASE CABLE STRAIGHT TIME (WITH PARTS)
815199	DOOR, LEFT FRONT STRAIGHT TIME (WITH PARTS)
817096	DOOR LOCKS WARRANTY SUBLET ONLY
817099	DOOR LOCKS STRAIGHT TIME (WITHOUT PARTS)
817199	DOOR LOCKS STRAIGHT TIME (WITH PARTS)
8171B6	TRUNK/TAILGATE/HATCH ROOF LATCH - REPLACE.
8171B7	TAILGATE LATCH AND CLOSER - REPLACE.
819199	DOOR LATCH, RIGHT FRONT STRAIGHT TIME (WITH PARTS)
821199	DOOR, LEFT REAR STRAIGHT TIME (WITH PARTS)
8211E2	SLIDE DOOR OUTER HANDLE CABLE STAY, LEFT - REPLACE.
822199	DOOR, RIGHT REAR STRAIGHT TIME (WITH PARTS)
8221E0	SLIDE DOOR OUTER HANDLE CABLE STAY, RIGHT - REPLACE.
823096	REAR COMPARTMENT WARRANTY SUBLET ONLY
823097	REAR COMPARTMENT WARRANTY PARTS ONLY
823099	REAR COMPARTMENT STRAIGHT TIME (WITHOUT PARTS)

Labor Operation Number	Labor Operation Number Description
823123	WEAK TAILGATE SUPPORT STRUTS, BOTH TAILGATE SUPPORT STRUTS - REPLACE. S/B# 01-104
823125	TRUNK LID/TAILGATE/HATCH SUPPORT, LEFT - REPLACE.
823130	TRUNK LID/TAILGATE/HATCH SUPPORT, RIGHT - REPLACE.
823135	TAILGATE/HATCH LATCH - REPLACE.
823199	REAR COMPARTMENT STRAIGHT TIME (WITH PARTS)
8231A9	TRUNK/TAILGATE/HATCH STRIKER - REPLACE.
8231B5	TRUNK/TAILGATE/HATCH OPENER ACTUATOR - REPLACE.
8231C5	TRUNK/TAILGATE/HATCH HINGE, RIGHT - REPLACE.
8231G1	TRUNK/TAILGATE/HATCH HINGES, BOTH - REPLACE.
8231H7	TRUNK/TAILGATE/HATCH HINGE "A", LEFT - REPLACE.
8231J2	TRUNK/TAILGATE/HATCH HINGES "A", BOTH - REPLACE.
8231J8	POWER TAILGATE MOTOR - REPLACE.
8231J9	POWER TAILGATE GEAR CASE - REPLACE.
8231K0	POWER TAILGATE CONTROL UNIT - REPLACE.
8231K7	POWER TAILGATE SENSORS, BOTH - REPLACE.
8231K8	POWER TAILGATE ARM UNIT- REPLACE.
823505	CODES/OPERATING DATA/INITIALIZATION - RETRIEVE OR CLEAR CODES WITH THE PGM TESTER OR HONDA DIAGNOSTIC SYSTEM. ACCESS FLASH CODES WITH SRS INDICATOR LIGHT. INITIALIZE RESTRAINT/SRS SYSTEM. PERFORM INPUT TESTS.
824199	WINDOW MOLDINGS STRAIGHT TIME (WITH PARTS)
826199	DOOR GLASS AND HARDWARE, LEFT FRONT STRAIGHT TIME (WITH PARTS)
829199	DOOR GLASS W/ HARDWARE, LEFT REAR STRAIGHT TIME (WITH PARTS)
838100	REAR DOOR WEATHERSTRIP SUB-SEAL (RIGHT) - REPLACE.
857099	DOOR WEATHERSTRIP STRAIGHT TIME (WITHOUT PARTS)