



May 1, 2008

Mr. Thomas Z. Cooper  
Chief, Vehicle Integrity Division  
Office of Defects Investigation  
National Highway Traffic Safety Administration  
1200 New Jersey Avenue, SE  
Washington, D.C. 20590

RE: NVS-212.pco, PE08-017

Dear Mr. Cooper:

This letter provides a partial response to your above referenced request for information, dated March 14, 2008. Complete responses are provided for Requests 1, 2a, 2b, 2c, 2d, 3, 5, 6, 7, 12a, 12c, 13a, and 13b. Partial responses are provided for Requests 2e, 2f, and 4. NHTSA has granted an extension until May 23, 2008 to provide responses to Requests 8, 9, 10, 11, 12b, and 14 as well as additional information relevant to 2e, 2f, 4, and 13.

Prior to responding to the request, Hyundai objects to NHTSA's boilerplate definition of "Document" as vague, incomprehensible, overly broad and unduly burdensome. Hyundai has made a good faith, reasonable attempt to search for materials responsive to each request in the time frame provided.

Request 1.

State within the body of the response letter a summary, by model and model year, the number of subject vehicles Hyundai has manufactured for sale or lease in the United States. Separately, for each subject vehicle manufactured to date by Hyundai, state the following:

- a. Vehicle identification number (VIN);
- b. Make;
- c. Model;
- d. Model Year;
- e. Date of manufacture (in "yyyy/mm/dd" date format);
- f. Date warranty coverage commenced (in "yyyy/mm/dd" date format); and
- g. The State in the United States where the vehicle was originally sold or leased (or delivered for sale or lease).

**Hyundai-Kia America Technical Center Inc.**  
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HATCI is an authorized representative of both Hyundai Motor Company and Kia Motors Corporation; which are separate and distinct automotive manufacturers.

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Provide the detailed information in Microsoft Access 2000, or a compatible format, entitled "PRODUCTION DATA."

Response to Request 1.

<b>Model</b>	<b>Model Year</b>	<b>Production Quantity</b>
Elantra	2001	104,062
Elantra	2002	116,548
Elantra	2003	127,531
Elantra	2004	103,810
Elantra	2005	132,495
Elantra	2006	99,120

See Attachment "PRODUCTION DATA.mbd" for additional requested information.

Source: Hyundai Motor America  
Information as of March 21, 2008

Request 2.

State the number of each of the following, received by Hyundai, or of which Hyundai 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; and
- e. Third-party arbitration proceedings where Hyundai is or was a party to the arbitration; and
- f. Lawsuits, both pending and closed, in which Hyundai is or was a defendant or codefendant.

For subparts "a" through "d" 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 Hyundai'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 initiating the action was filed.



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- e. Third-party arbitration proceedings where Hyundai is or was a party to the arbitration;  
and

<b>Model / Model Year</b>	<b>2001</b>	<b>2002</b>	<b>2003</b>	<b>2004</b>	<b>2005</b>	<b>2006</b>
Elantra	44 (All 44 also referenced in a consumer complaint)	6 (All 6 also referenced in a consumer complaint)	3 (All 3 also referenced in a consumer complaint)	None	1 (Also referenced in a consumer complaint)	None

- f. Lawsuits, both pending and closed, in which Hyundai is or was a defendant or codefendant.

<b>Model / Model Year</b>	<b>2001</b>	<b>2002</b>	<b>2003</b>	<b>2004</b>	<b>2005</b>	<b>2006</b>
Elantra	7 (Including 4 also referenced in a consumer complaint)	1	None	1	None	None

Source: Hyundai Motor America

Information as of March 20, 2008 for 2a and 2b and as of March 31, 2008 for 2c, 2d, 2e, and 2f.

See Attachment A for requested summary information.

**Request 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. Hyundai'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 (in "yyyy/mm/dd" date format);
- h. Report or claim date (in "yyyy/mm/dd" date format);
- i. Whether a crash is alleged;

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- 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 to Request 3.

See Attachment "REQUEST NUMBER TWO DATA.mdb" for requested information.

Source: Hyundai Motor America  
Information as of March 20, 2008 for 3a and 3b and as of March 31, 2008 for 3c, 3d, 3e, and 3f.

Request 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 Hyundai used for organizing the documents.

Response to Request 4.

See Attachments B and B1 for requested consumer complaint information. Attachment B contains information received through September 28, 2007. Attachment B1 contains information received after that date through March 20, 2008. Both Attachments are organized by file number.

See Attachment C for requested field report information. Field Reports are identified by VIN. Extension granted until May 23, 2008 to provide additional information in response to this request.

Source: Hyundai Motor America  
Information as of March 20, 2008 for Attachment A and as of March 31, 2008 for Attachment B.

Request 5.

State within the body of the response letter a summary, by model and model year, a total count for all of the following categories of claims, collectively, that have been paid by Hyundai 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. Hyundai's claim number;
- b. Vehicle owner or fleet name (and fleet contact person) and telephone number;
- c. VIN;

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- d. Repair date (in “yyyy/mm/dd” date format);
- 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;
- k. Comment, if any, by dealer/technician relating to claim and/or repair; and
- l. Type of claims/issue (liquid spill or loose wiring if not readily identifiable from the repair code or the part replacement fields).

Provide the detailed information in Microsoft Access 2000, or a compatible format, entitled “WARRANTY DATA.”

Response to Request 5.

<b>Model</b>	<b>Model Year</b>	<b>Claim Quantity</b>
Elantra	2001	9,909
Elantra	2002	2,303
Elantra	2003	1,149
Elantra	2004	510
Elantra	2005	431
Elantra	2006	360

See Attachment “WARRANTY DATA.mdb” for additional requested information.

Source: Hyundai Motor America  
Information as of March 26, 2008

Request 6.

Describe in detail the search criteria used by Hyundai 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 Hyundai 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 Hyundai 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 to Request 6.

The Claims were identified by searching for warranty claims containing the causal part numbers

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for the airbag control module and the harness that leads from the control module to other airbag system components and harnesses and that had the problem code indicating "Warning Light On".

Please see Attachment D for a list of all labor operations, labor operation descriptions, problem codes, and problem code descriptions applicable to the alleged defect in the subject vehicles.

The Hyundai New Vehicle Limited Warranty period is limited to 60 months from the date of original retail delivery or date of first use, or 60,000 miles, whichever occurs first. Occupant restraint systems are covered by the Hyundai New Vehicle Limited Warranty.

Hyundai offered two extended warranty options for the subject vehicles. One plan offered coverage for 72 months or 75,000 miles and the second plan offered coverage for 120 months or 100,000 miles from the date of first use. Occupant restraint systems are not covered by either Hyundai extended warranty plan. The number of vehicles covered under each extended warranty plan is as follows:

72 months or 75,000 miles plan

<b>Model / Model Year</b>	<b>2001</b>	<b>2002</b>	<b>2003</b>	<b>2004</b>	<b>2005</b>	<b>2006</b>
Elantra	1,086	1,406	1,139	755	1,090	1,060

120 months or 100,000 miles plan

<b>Model / Model Year</b>	<b>2001</b>	<b>2002</b>	<b>2003</b>	<b>2004</b>	<b>2005</b>	<b>2006</b>
Elantra	11,852	13,699	14,682	11,296	13,345	8,160

Source: Hyundai Motor America  
Information as of April 23, 2008

Request 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 Hyundai 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 Hyundai is planning to issue within the next 120 days.

Response to Request 7.

There are no such documents.

Source: Hyundai Motor America  
Information as of April 28, 2008

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### Request 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, Hyundai. 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 conducting 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 to Request 8.

Extension granted until May 23, 2008 to respond to this request.

### Request 9.

Describe all modifications or changes made by, or on behalf of, Hyundai 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 including any addition of a splash/spill shield over the air bag control module. 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 or 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 Hyundai is aware of which may be incorporated into vehicle production within the next 120 days.



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Response to Request 9.

Extension granted until May 23, 2008 to respond to this request.

Request 10.

Provide the electrical circuit diagram of the main air bag module connector interface including the relative location and function of each pin and the power status during vehicle operation (i.e. 12V supply power, module ground, positive to driver air bag etc...) and a diagram showing the relative location and distances of the air bag control module and module main connector(s) in relationship to the parking brake opening and the nearest cup holder cavity in the center control console.

Response to Request 10.

Extension granted until May 23, 2008 to respond to this request.

Request 11.

Provide an assessment of the air bag operation when the air bag light is illuminated (illuminated intermittently or constant ON) due to a loose wire/connector condition and its ability to deploy in the event of a valid crash event. Provide a description of all possible fault codes and definitions for each related to the alleged defect.

Response to Request 11.

Extension granted until May 23, 2008 to respond to this request.

Request 12.

Provide two of each of the following:

- a. Exemplar samples of each design version of the subject component including the air bag module, air bag control module wiring harness(s), center console and the loose wiring harness;
- b. Field return samples of the subject component exhibiting the subject failure mode; and
- c. Any kits that have been released, or developed, by Hyundai for use in service repairs to the subject component/assembly which relate, or may relate, to the alleged defect in the subject vehicles.

Response to Request 12.

- a. Two exemplar samples of each design version of the subject component including the air bag

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control module, air bag control module wiring harness(s), and center consoles shipped separately as Attachment E.

Source: Hyundai Motor America  
Information as of April 30, 2008

- b. Extension granted until May 23, 2008 to respond to this request.
- c. Any kits that have been released, or developed, by Hyundai for use in service repairs to the subject component/assembly which relate, or may relate, to the alleged defect in the subject vehicles.

There are no such kits.

Source: Hyundai Motor Company  
Information as of April 29, 2008

Request 13.

State the number of each of the following that Hyundai has sold that may be used in the subject vehicles by component name, part number (both service and engineering/production), model 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 (air bag control module & wiring harnesses only); and
- b. Any kits that have been released, or developed, by Hyundai 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 Hyundai 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 Request 13.

- a. See Attachment F for requested part sales information.

Source: Hyundai Motor America  
Information as of March 21, 2008

- b. No kits have been released.

Source: Hyundai Motor Company  
Information as of March 31, 2008

Extension granted until May 23, 2008 to respond to the supplier information request.

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Request 14.

Furnish Hyundai'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 to Request 14.

Extension granted until May 23, 2008 to respond to this request.

Sincerely,



Robert Babcock  
Senior Manager, Certification and Compliance Affairs

Attachments:

Two CDs, each containing:  
NVS-212pco, PE08-017 PRODUCTION DATA.mdb;  
NVS-212pco, PE08-017 REQUEST NUMBER TWO DATA.mdb;  
NVS-212pco, PE08-017 WARRANTY DATA.mdb;  
NVS-212pco, PE08-017 Attachment A Summary Information.xls;  
NVS-212pco, PE08-017 Attachments B and B1 Consumer Complaints.doc;  
NVS-212pco, PE08-017 Attachment C Field Reports (containing 30 Field Report pdf files);  
NVS-212pco, PE08-017 Attachments D Warranty Data Related Codes.doc;  
NVS-212pco, PE08-017 Attachment F Parts Sales – Air Bag Control Module and Air Bag Wiring Harness.xls

Note: Attachment E Shipped Separately