

HONDA

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August 4, 2008

NVS-212mji
PE08-026

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 response to our teleconference of July 23, 2008, we are submitting an amended final response regarding allegations of unexpected closing of the power tailgate on model year (MY) 2005 through 2007 Honda Odyssey vehicles equipped with the optional power tailgate feature. The information we are submitting today is in addition to the earlier submissions of documents and video files on June 20, June 26 and July 31 of 2008.

The responses and references following each question below only specifies the additional information being submitted today, as you have already received all earlier documents and files. Many of the documents submitted today are being provided with a request for confidentiality for various reasons noted on the affidavit accompanying the request to 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. 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 submitted June 20, 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 initiating the action was filed.

Response submitted June 20, 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 submitted June 20, 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 submitted June 20, 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 submitted June 20, 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 submitted June 20, 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 issue within the next 120 days.

Response submitted June 20, 2008

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, 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:
 - 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. 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:

Please see the files listed below, each of which has been included in Attachment Q8 on enclosed CD. These documents include our in-house identification of concerns related to model year 2005 through 2007 Honda Odyssey power tailgate strut failures and all actions taken to reduce the failure rate taken by the supplier for these components, Stabilus. Please note that Honda contends that the premature wear of these gas struts does not pose a risk to motor vehicle safety, as we have previously explained.

Action #1

HMA QIS-SHJA05011002 – [Requesting Confidentiality]

- (a) Title: Tailgate Open Stays – Does not hold tailgate open.
- (b) Planned start date of 2005/12/13 – “Theme Up Date”
- (c) Expected end date of 2006/04/10 – “Finish Date”
- (d) A “spike” in the defect rate had been identified occurring around September/October 2004 production of the 2005 model year Odyssey. Burrs identified in the gas strut shafts resulting in scratches to the seal, leading to strut failure.
- (e) Honda of America Manufacturing Market Quality group issued the referenced Quality Improvement Sheet
- (f) The root cause was identified as a sharp edge on the shaft guide due to insufficient deburring by the supplier. A temporary countermeasure of increasing the deburring time from 6 minutes to 18 minutes was planned, with a permanent countermeasure to change the shaft design to include a radius at the rod guide to eliminate the sharp edge. Parts had not been received for analysis at the time of the document being issued.

HMA QIS-SHJA07040601 – [Requesting Confidentiality]

- (a) Title: Tailgate Will Not Stay Open, Strut Failure
- (b) Planned start date of 2005/01/10 – “Theme Up Date”
- (c) Expected end date of 2005/06/17 – “Finish Date”
- (d) A higher than anticipated defect rate for gas tailgate struts. An accumulation of dirt and debris accumulating at the outside of the seal in combination with side loading forces was believed to have caused the tailgate strut seals to leak, causing the struts to fail to hold gas pressure and eventually fail.
- (e) Honda of America Manufacturing Market Quality Group issued the referenced Quality Improvement Sheet
- (f) The root cause was identified as an accumulation of dirt and debris in combination with side loading forces on the gas tailgate struts causing the seals to be compromised, leading to eventual failure of the gas struts. Failure of the struts will cause the liftgate to fall if not addressed.

HMA QIS-SKVA50121303 – [Requesting Confidentiality]

- (a) Title: Tailgate Open Stay Failure – After Deburring Countermeasure
- (b) Planned start date of 2007/04/06 – “Theme Up Date”
- (c) Expected end date of 2007/05/16 – “Finish Date”
- (d) Power tailgate gas strut failure rates noted to be higher than manual tailgates after deburring countermeasure (QIS SHJA05011002). Supplier (Stabilus) analyzed the

parts and found contamination in the seal area that appeared to have originated from the assembly process.

- (e) Honda of America Manufacturing Market Quality Group issued the referenced Quality Improvement Sheet
- (f) Changes in the production line at Stabilus were to be implemented to prevent contaminants from entering the parts storage bins prior to strut assembly. The weld process was also modified, including addition of visual and measurement-based inspections to ensure weld accuracy.

Additional Response:

050217 Stabilus Report 1 from US
050614 Meeting Memo
050614 Stabilus Report 2 from Germany
050622 Meeting memo
050622 Stabilus Report 3 from Germany
050624 Stabilus Report 4 from Germany
050628 Meeting memo
050713 Meeting memo
050722 Stabilus Report 5 from Germany
050723 Stabilus Report 6 from Germany
051222 Stabilus Report 7 from Germany
060106 Stabilus Report 8 from Germany
060113 Stabilus Report 9 from Germany
080710 Stabilus Report 10 from US

Pending request for
confidentiality

9. State all design and performance specifications, requirements, guidelines, and estimated performance characteristics developed and/or used by Honda or on its behalf (e.g., by a supplier) that were suggested, considered, and/or used in the design of the subject component as originally designed for MY 2005 subject vehicles, including:
- a. The strut lifting capacity (in pounds force), including lifting capacity at different strut extension lengths and at different ambient temperatures, when the struts are new and as the strut lifting capacity degrades over time/usage;
 - i) The open stay force for the power tailgate was set at $865N \pm 15N$ initially, and eventually reduced to $825N \pm 15N$
 - b. The design usage cycles (one cycle comprising an extension and compression) from when the strut is installed on the subject vehicles until the strut can no longer maintain the tailgate in the full open position;
 - i) The design usage cycles for durability testing were set at 20,000 cycles
 - c. The expected usage cycles (one cycle comprising an extension and compression) from when the strut is installed on the subject vehicles until the strut can no longer maintain the tailgate in the full open position;
 - i) When tested to the design target of 20,000 cycles the components and systems in question showed no cracking, deformation or substantial loss of marketability and were judged to be OK. As no failure occurred within the design target, no estimate of failure was determined.

- d. **The design wear rate (stated as a percentage of initial lifting force diminished over time or other rate or number used by Honda or its supplier) of the subject component installed on a subject vehicle;**
- i) The design characteristics for the power tailgate do not include a Honda target for diminished lifting force or a specified decay rate. The performance targets are expected to be met throughout the 20,000 cycle design target.
- e. **The expected wear rate (stated as a percentage of initial lifting force diminished over time) of the subject component installed on a subject vehicle; and**
- i) No target was set or forecast was made for the expected wear rate of the power tailgate gas struts. The components were tested for 20,000 cycles with no loss of function or performance outside of the targets set for the system.
- f. **The estimated usage rate in the field and expected amount of time a strut will be in service on a subject vehicle before the strut is no longer capable of maintaining the tailgate in the open position.**
- i) The documents provided by Honda Manufacturing of Alabama do not indicate any acceptable or target failure rate specifically for the power tailgate gas struts. To the best of our knowledge, Honda did not set an original target for failure rates for these components.

Additional Response:

Documents related to the performance, reliability, expected wear and anticipated use are listed below. Copies of the full documents are provided in Attachment Q9 on enclosed CD.

A0-23 English
A0-23 Japanese
A0-28 English
A0-28 Japanese
Drawing 74820-SHJ-A611-M1
New Technology Evaluation English
New Technology Evaluation Japanese

Pending request for
confidentiality

10. Produce copies of all documents relating to your response to Request No. 9.

Response:

Copies of these documents are included as Attachment Q9 on enclosed CD, as referenced in response to question 9.

11. Produce all documents reflecting communication(s) with the supplier of the subject component relating to your response to Request No. 9.

Response:

The document ""Spec Test Result from Stabilus" is included as Attachment Q11 on enclosed CD

12. Produce copies of all engineering specifications and drawings for the subject component, including but not limited to each item relating to your response to Request No. 9.

Response:

Copies of these documents are included as Attachment Q9 on enclosed CD, as referenced in response to questions 9 and 10.

13. Describe all modification 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:
- 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) (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;
 - h. Whether the modified component can be interchanged with earlier production components; and
 - i. State all design and performance specifications, requirements, guidelines, and estimated performance characteristics developed and/or used by Honda or on its behalf that were suggested, considered, and/or used in the design of the modified component, including:
 - i) The modified strut lifting capacity (in pounds force), including lifting capacity at different strut extension lengths and at different ambient temperatures, when the struts are new and as the strut lifting capacity degrades over time/usage;
 - ii) The design usage cycles (one cycle comprising an extension and compression) from when the modified strut is installed on the subject vehicles until the strut can no longer maintain the tailgate in the full open position;
 - iii) The expected usage cycles (one cycle comprising an extension and compression) from when the modified strut is installed on the subject vehicles until the strut can no longer maintain the tailgate in the full open position;
 - iv) The design wear rate (stated as a percentage of initial lifting force diminished over time or other rate or number used by Honda or its supplier) of the modified component installed on a subject vehicle;
 - v) The expected wear rate (stated as a percentage of initial lifting force diminished over time or other rate or number used by Honda or its supplier) of the modified component installed on a subject vehicle; and
 - vi) The estimated usage rate in the field and expected amount of time a modified strut will be in service on a subject vehicle before the strut is no longer capable of maintaining the tailgate in the full open position.

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.

Action #1: Initial production start prior to any countermeasures: Mass Production Spec. Notice: 05M US Odyssey: DWG Issue of T/Gate Equipment

- (a) July 2004
- (b) No change – original design prior to start of mass production.
- (c) No related change – original design
- (d) Part No. 74820-SHJ-A611
- (e) N/A
- (f) This entry refers to the original component

- (g) This original component was made available as a service component from the initial start of retail sales of the 2005 model year Honda Odyssey
- (h) The entry refers to the original component
- (i) As follows:
 - (i) The lifting capacity is designated as $865N \pm 15N$ (194.5 pound-force \pm 3.4 pound-force)
 - (ii) The design target and durability test routine included 20,000 cycles with no failure or deterioration in marketability
 - (iii) The design target of 20,000 cycles is expected to exceed customer usage
 - (iv) No initial targets were set or forecasts made for failure rates. Failure is monitored in the market and evaluated based on occurrences observed.
 - (v) No targets were set for diminished capacity or performance, outside of the initial performance band of $865N \pm 15N$ (194.6 pound-force \pm 3.4 pound-force)
 - (vi) The struts as installed at the factory are intended to perform as designed. As failures occur they are recorded and monitored. Because the failure of a power tailgate gas strut poses a customer satisfaction issue as opposed to a safety concern, the claims are evaluated accordingly.

Action #2: Manufacturing Instruction XD520281: Apply Dust Seal to Open Stay to Improve Toughness

- (a) MI XD520281 was implemented on June 14, 2005
- (b) A dust seal cover was applied above the gas strut seal to the shaft to help prevent debris from entering the seal and potentially resulting in damage to the seal.
- (c) The modification was implemented as a three month trial to evaluate its effectiveness to prevent debris from gathering directly on the seal where it was believed the shaft could force debris into the seal and cause it to fail. A failed seal would release the gas and result in strut failure.
- (d) The original part no. was 74820-SHJ-A612
- (e) The part number of the modified component was 74820-SHJ-A612-12C
- (f) As this design change was initially implemented as a three-month trial evaluation, the original part number was no longer used at the factory, but was not removed from commerce as a service part.
- (g) The modified component was made available as a service simultaneously or shortly after its application in production on June 14, 2005
- (h) The modified component is interchangeable with earlier production components
- (i) As follows:
 - i. The lifting capacity is designated as $865N \pm 15N$ (194.5 pound-force \pm 3.4 pound-force)
 - ii. The design target and durability test routine included 20,000 cycles with no failure or deterioration in marketability
 - iii. The design target of 20,000 cycles is expected to exceed customer usage
 - iv. No initial targets were set or forecasts made for failure rates. Failure is monitored in the market and evaluated based on occurrences observed.
 - v. No targets were set for diminished capacity or performance, outside of the initial performance band of $865N \pm 15N$ (194.6 pound-force \pm 3.4 pound-force)
 - vi. The struts as installed at the factory are intended to perform as designed. As failures occur they are recorded and monitored. Because the failure of a power tailgate gas strut poses a customer satisfaction issue as opposed to a safety concern, the claims are evaluated accordingly.

Action #3: Manufacturing Instruction XD521060: Remove Dust Covers from SHJ Tailgate Open Stays

- (a) MI XD521060 was implemented on May 22, 2006
- (b) This manufacturing instruction rescinds MI XD520281 as it was found to be ineffective at reducing the failure rate of gas struts for the power tailgate.
- (c) The modification of XD520281 had been implemented as a three month trial to evaluate its effectiveness to prevent debris from gathering directly on the seal where it was believed the shaft could force debris into the seal and cause it to fail. After 11 months of implementation it was found to be ineffective.
- (d) The original part no. was 74820-SHJ-A612, the first modification was designated as part no. 74820-SHJ-A612-12C
- (e) The part number of the modified component was returned to 74820-SHJ-A612
- (f) As this design change was initially implemented as a three-month trial evaluation, the original part number was no longer used at the factory, but was not removed from commerce as a service part.
- (g) The modified component was made available as a service simultaneously or shortly after its application in production on June 14, 2005
- (h) The modified component is interchangeable with earlier production components
- (i) As follows:
 - i. The lifting capacity is designated as $865N \pm 15N$ (194.5 pound-force \pm 3.4 pound-force)
 - ii. The design target and durability test routine included 20,000 cycles with no failure or deterioration in marketability
 - iii. The design target of 20,000 cycles is expected to exceed customer usage
 - iv. No initial targets were set or forecasts made for failure rates. Failure is monitored in the market and evaluated based on occurrences observed.
 - v. No targets were set for diminished capacity or performance, outside of the initial performance band of $865N \pm 15N$ (194.6 pound-force \pm 3.4 pound-force)
 - vi. The struts as installed at the factory are intended to perform as designed. As failures occur they are recorded and monitored. Because the failure of a power tailgate gas strut poses a customer satisfaction issue as opposed to a safety concern, the claims are evaluated accordingly.

Action #4: Mass Production Spec. Notice: 08M US Odyssey: Changing T/Gate O/Stay

- (a) Mass Production Spec. Notice and the issuance of a new drawing occurred on September 7, 2007 with an effective implementation date on the manufacturing line of October 2007
- (b) The reactive force of the power tailgate open stay was reduced from $865N \pm 15N$ (194.6 pound-force \pm 3.4 pound-force) to a new value of $825N \pm 15N$ (185.5 pound-force \pm 3.4 pound-force)
- (c) The reactive force reduction of the gas struts was made to improve durability and reliability by reducing the forces required of the struts.
- (d) The original part no. was 74820-SHJ-A612, superceded by 74820-SHJ-A612-12C, superceded by 74820-SHJ-A612
- (e) The part number of the modified component was 74820-SHJ-A710
- (f) The original part was not withdrawn from commerce as this action was undertaken to improve market quality.
- (g) The modified component was introduced as a service part simultaneously or slightly later than the application of this part to mass production assembly.
- (h) The modified component is interchangeable with earlier production components
- (i) As follows:
 - i. The lifting capacity is designated as $825N \pm 15N$ (185.5 pound-force \pm 3.4 pound-force)

- ii. The design target and durability test routine included 20,000 cycles with no failure or deterioration in marketability
- iii. The design target of 20,000 cycles is expected to exceed customer usage
- iv. No initial targets were set or forecasts made for failure rates. Failure is monitored in the market and evaluated based on occurrences observed.
- v. No targets were set for diminished capacity or performance, outside of the new performance band of $825N \pm 15N$ (185.6 pound-force \pm 3.4 pound-force)
- vi. The struts as installed at the factory are intended to perform as designed. As failures occur they are recorded and monitored. Because the failure of a power tailgate gas strut poses a customer satisfaction issue as opposed to a safety concern, the claims are evaluated accordingly.

Response:

All documents related to changes to the design, durability and performance of the struts in question are listed below. Copies of the documents are include in this response as Attachment Q13 on attached CD.

Tailgate Open Stay DC History (following as attachment Q13)

DC Notice A612 English
DC Notice A612 Japanese
DC Notice A710 English
DC Notice A710 Japanese
Drawing 74820-SHJ-A710-M1
XD520281
XD521060

Requesting
Confidentiality for
these documents

- 14. Produce copies of all engineering specifications and drawings for the subject component, including but not limited to each item within the scope of your response to Request No. 13.**

Response:

Copies of these documents are included as Attachment Q13 on enclosed CD, as referenced in response to question 13.

- 15. State the weight of the tailgate as installed on the subject vehicles. If this value varies for any reason (for example, if certain vehicle options add to or subtract from the weight of the tailgate), provide the reason(s) for the variation and the respective weight of the tailgate associated with each variation.**

Response submitted June 20, 2008

- 16. Produce copies of all documents related to all durability testing of the subject component conducted by Honda or by its supplier.**

Response:

Copies of these documents are included as Attachment Q9 on enclosed CD, as referenced in response to questions 9, 10 and 12.

17. Produce copies of all documents related to all environmental testing of the subject component conducted by Honda or by its supplier.

Response:

Copies of these documents are included as Attachment Q9 on enclosed CD, as referenced in response to questions 9, 10, 12 and 16.

18. Describe in detail all aspects of the operation of the power tailgate feature in the subject vehicles, including any built-in safety features and any features designed to mitigate potential injuries from a descending or otherwise falling tailgate. Describe in detail the safety-related features that operate or activate when the struts can no longer maintain the tailgate in the full open position. In your answer, include a discussion of how the safety features operate; including a description of the circumstances in which the safety features will activate and a description of how the safety features operate in each circumstance.

Response submitted June 26, 2008 and July 31, 2008

19. Describe in detail the operation of the power tailgate feature in the subject vehicles when equipped with struts that cannot support the tailgate in the open position. In your description, discuss how this feature operates and include nominal speed threshold (including tolerances) required to activate the power close feature.

Response submitted June 26, 2008 and July 31, 2008

20. Produce copies of all documents that relate to your response to Request Nos. 18 and/or 19.

Response submitted June 26, 2008 and July 31, 2008

21. State whether the controlled (automatic) closing design feature will activate when the struts cannot support the tailgate and the operator manually opens the tailgate to the fully-open position, as well as when the operator manually opens the tailgate to a position less than fully-open.

Response submitted June 26, 2008 and July 31, 2008

22. Produce copies of all documents relating to your response to Request No. 21.

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23. Describe any variation in the power tailgate operation including, but not limited to, variations that can be programmed in the power tailgate control module.

No variations of operation can be programmed to the power tailgate control module.

24. Produce copies of all documents relating to your response to Request No. 23.

N/A per response to question 23.

25. Produce two of each of the following:

- a. Exemplar samples of each design version of the subject components;
- b. Field-returned samples of the subject components exhibiting the subject failure mode;
- c. Any kits and software changes (including patches, modifications, and reflashes) 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; and
- d. The owner's manuals for MY 2005 through 2007 Honda Odyssey vehicles.

Response: Sample parts per question 25 "a" through "c" are being shipped separately. The requested owner's manuals were provided on June 20, 2008.

26. 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:

Copies of these documents are included as printed Attachment Q13 & Q26.

Stabilus (supplier) contact:
Susan Barker
Account Manager, Stabilus
36225 Mount Road
Sterling Heights, MI 48310

This component is only applied to the Honda Odyssey with power tailgate, model years 2005 and later.

27. Does Honda sell the subject component individually or in pairs?

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28. Furnish Honda's assessment of the alleged defect in the subject vehicles, 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; and
- 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.

Response:

- a. The conditions specified by NHTSA could occur as a result of failure of one or both of the gas struts. The strut failures typically occur gradually providing the the user with advance

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notice that the operating characteristics of the power tailgate have changed over time. The changes would be exhibited by the power tailgate closing under power, along with a continuous warning tone to alert the user to the strut failure.

- b. See our response to question #10 for a detailed description of the failure mechanism.
- c. The failure mode of the Odyssey power tailgate is described in the presentation and videos provided on June 26, 2008.
- d. We do not believe that a defect exists that poses a risk to motor vehicle safety. In the event that one or both power tailgate struts fail, the operation of the power tailgate is designed to change in a dramatic and obvious way. As the power liftgate would alert the user to the change, and the tailgate is designed to close under power with the aid of resistance sensing we believe that no risk to motor vehicle safety is present.
- e. Please see the presentation and video files that were provided to NHTSA on June 26, 2008 and subsequent videos sent to NHTSA on July 31, 2008 for a complete description of the indications provided to the user that the power tailgate struts have failed.

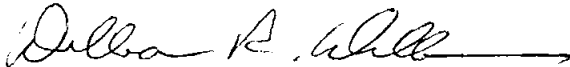
29. **Furnish copies of all communications sent from and received by Honda that relate to or may relate to the alleged defect (including the performance and durability of the subject component), including but not limited to such communications between Honda and the subject component manufacturer and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

Response:

Copies of these documents are included as Attachment Q8 on enclosed CD.

Sincerely,

AMERICAN HONDA MOTOR CO., INC.



William R. Willen
Managing Counsel
Product Regulatory Office

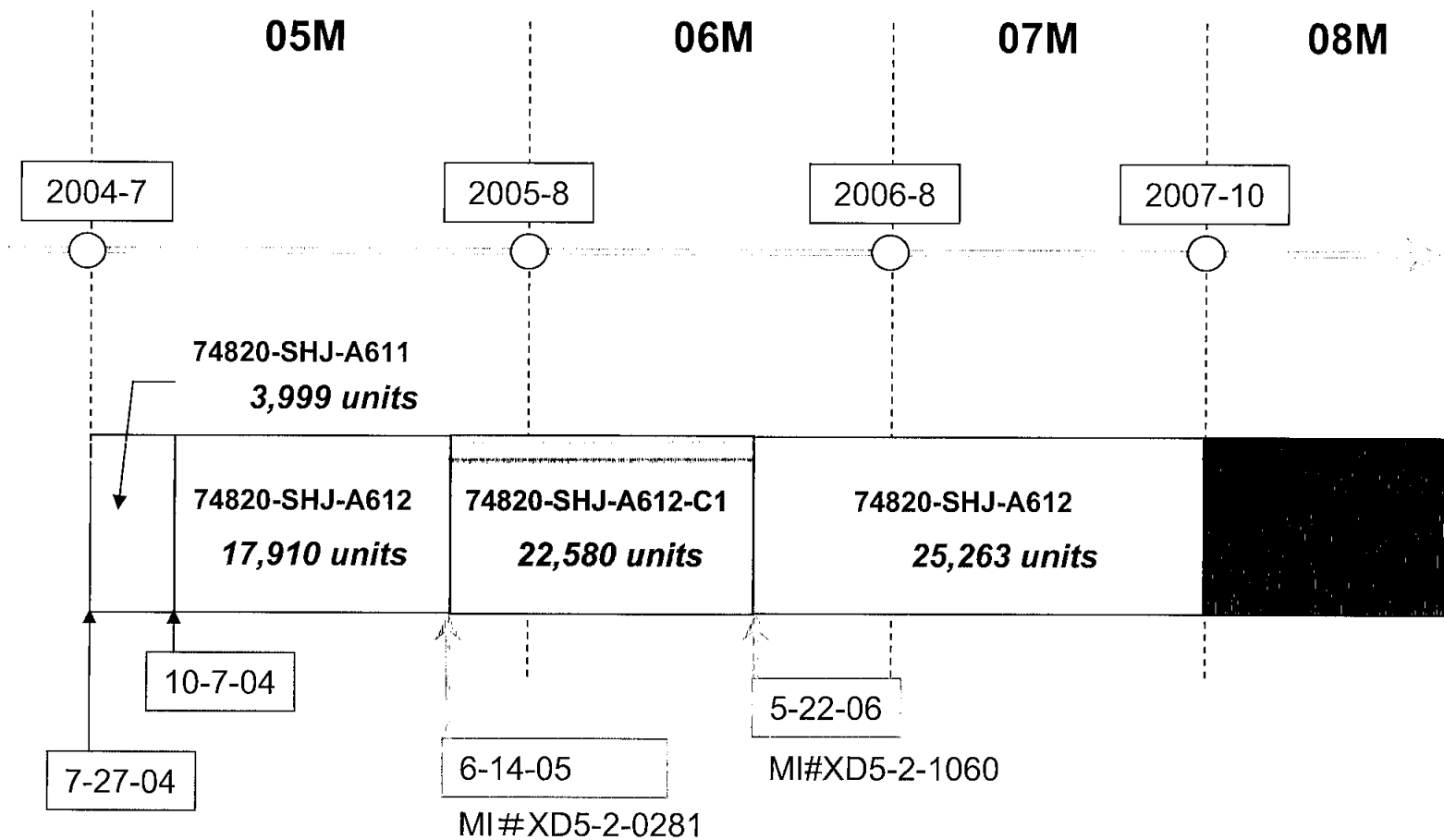
WRW:nis

Attachments

Attachment Q13

Odyssey Tailgate Open Stay Design Change History

Date of Design Change & Number of Production



Attachment Q26

Q26
 COMPONENT SALES HISTORY
 AS OF 06/30/08

PART DESC	SERVICE PART NO.	MODEL APPLICATION	CALENDAR YEAR				
			2004	2005	2006	2007	2008
STAY, TAILGATE OPEN	74820-SHJ-A61	2005-2007 Odyssey	53	917	2166	3453	2337*

*Parts demand thru June 2008

24-MONTH HISTORY	
Jul-06	180
Aug-06	208
Sep-06	153
Oct-06	195
Nov-06	162
Dec-06	123
Jan-07	208
Feb-07	151
Mar-07	248
Apr-07	350
May-07	405
Jun-07	354
Jul-07	318
Aug-07	388
Sep-07	302
Oct-07	300
Nov-07	245
Dec-07	184
Jan-08	252
Feb-08	273
Mar-08	337
Apr-08	413
May-08	448
Jun-08	614