

Handwritten: Hall 6/19/08



June 13, 2008

2008 JUN 17 AM 10:24

Mr. Jeffrey L. Quandt
Chief, Vehicle Control Division
Office of Defects Investigation
National Highway Traffic Safety Administration
1200 New Jersey Avenue, SE
Washington, D.C. 20590

RE: NVS-213aan, PE08-029

Dear Mr. Quandt:

This letter provides a partial response to your above referenced request for information, dated April 30, 2008. Complete responses are provided for Requests 1, 2, 3, 4, 5, 6, 7, and 11. A partial response is provided for Request 8. NHTSA has granted an extension until July 11, 2008 to provide responses to Requests 9, 10, and 12 as well as additional information relevant to Request 8.

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, by 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;
- 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."

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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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Response to Request 1.

Model	Model Year	Production Quantity
Sonata	1999	23,988
Sonata	2000	50,439
Sonata	2001	46,085
Sonata	2002	78,394

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

Source: Hyundai Motor America
Information as of May 12, 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 "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 "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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Response to Request 2.

a. Consumer complaints, including those from fleet operators;

Model / Model Year	1999	2000	2001	2002
Sonata	113 (Regarding 111 vehicles)	167 (Regarding 162 vehicles)	39 (Regarding 38 vehicles)	40 (Regarding 39 vehicles)

b. Field reports, including dealer field reports;

Model / Model Year	1999	2000	2001	2002
Sonata	10 (Including 1 also referenced in a consumer complaint)	12 (Including 1 also referenced in a consumer complaint)	4 (Including 1 also referenced in a consumer complaint)	2

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;

Model / Model Year	1999	2000	2001	2002
Sonata	2	2	None	1

d. Property damage claims; and

Model / Model Year	1999	2000	2001	2002
Sonata	None	None	None	None

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

Model / Model Year	1999	2000	2001	2002
Sonata	None	5 (All 5 also referenced in consumer complaints)	None	None

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

Model / Model Year	1999	2000	2001	2002
Sonata	None	None	None	None

Source: Hyundai Motor America

Information as of May 13, 2008 for 2a and 2b and as of May 23, 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;
- 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 to Request 3.

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

Source: Hyundai Motor America

Information as of May 13, 2008 for items related to 2a and 2b and as of May 23, 2008 for items related to 2c, 2d, 2e, and 2f

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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 B1 and B2 for requested consumer complaint information. Attachment B1 contains information received through September 28, 2007. Attachment B2 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.

Source: Hyundai Motor America
Information as of May 13, 2008

Request 5.

State, 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;
- 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 claim and/or repair.

Provide this information in Microsoft Access 2000, or a compatible format, entitled "WARRANTY DATA."

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Response to Request 5.

Model	Model Year	Claim Quantity
Sonata	1999	174
Sonata	2000	447
Sonata	2001	179
Sonata	2002	220

See Attachment "WARRANTY DATA.mdb" for additional requested information.

Source: Hyundai Motor America
Information as of May 14, 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 claims containing the part numbers for the Crossmember Complete Assembly. Claims that contained a Nature Code N56 (Rust, Corrosion) and/or a Cause Code C05 (Rusty, Corroded) were included in the data provided in response to Request No. 5. Additionally, claims that contained a technician comment referring to rust or corrosion of the subframe, cradle, etc. were also included. Claims related to vehicles referenced in field reports and Quality Information Reports were also included.

Please see Attachment D for a list of all labor operations, labor operation descriptions, problem codes, and problem code descriptions applicable to the claims provided in response to Request No. 5.

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.

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

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100,000 miles from the date of first use. The number of vehicles covered under each extended warranty plan is as follows:

72 months or 75,000 miles plan

Model / Model Year	1999	2000	2001	2002
Sonata	299	582	574	885

120 months or 100,000 miles plan

Model / Model Year	1999	2000	2001	2002
Sonata	1,621	4,702	4,392	9,002

Source: Hyundai Motor America
Information as of June 4, 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 June 10, 2008

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;

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- 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.

See Attachment E for requested information.

Source: Hyundai Motor Company
Information as of June 2, 2008

Extension granted until July 11, 2008 to provide additional information in response 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 of the subject vehicles to date, which relate to, or may relate to, the alleged defect in the subject vehicles. Include all differences between the construction, corrosion protection and drainage of the subject components and front sub-frames used in MY 2003 and later Sonata 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 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.

Response to Request 9.

Extension granted until July 11, 2008 to respond to this request.

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Request 10.

Provide the following information regarding the subject component:

- a. Provide top, side and front view diagrams of the subject component and the right-front suspension, wheel/tire and half-shaft;
- b. State the material composition and thickness/gauge of the wall section in the area of concern;
- c. Describe all potential paths for water and other foreign material entering the subject component and state where the water would collect (e.g., the low point of the assembly);
- d. Describe the corrosion protection system for the subject component (internal and external), including all minimum thickness specifications for anti-corrosion protection systems;
- e. Describe all requirements for salt-spray and other durability tests related to corrosion resistance; and
- f. Provide copies of all documents related to 10.a – 10.e

Response to Request 10.

Extension granted until July 11, 2008 to respond to this request.

Request 11.

State the number of front sub-frames 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):

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 11.

See Attachment F for requested part sales information.

Source: Hyundai Motor America
Information as of May 9, 2008

Part Number	Supplier Name	Supplier Address	Contact	Telephone
62405-38100	Saehwashin Co., Ltd.	903-7, Shinjang-ri, Ohga-myen, Yesan-gun, Chungcheongnam- do, Korea	Quality Assurance Team	82-41-330-3360
62405-38101				
62405-38600				
62405-38300				

Source: Hyundai Motor Company
Information as of June 11, 2008

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Request 12.

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 12.

Extension granted until July 11, 2008 to respond to this request.

Sincerely,



Robert Babcock
Senior Manager, Regulation and Certification Department

Attachments:

Two CDs, each containing:
PRODUCTION DATA.mdb;
REQUEST NUMBER TWO DATA.mdb;
WARRANTY DATA.mdb;
Attachment A Summary Information PE08-029.xls;
ATTACHMENT B Consumer Complaints PE08-029 (containing ATTACHMENT B1 Consumer Complaints.doc file .and ATTACHMENT B2 Consumer Complaints.xls file);
ATTACHMENT C Field Reports PE08-029 (containing 4 Field Report pdf files);
ATTACHMENT D Warranty Data Related Codes PE08-029.doc;
ATTACHMENT E Quality Information Reports PE08-029 (containing 1 xls, 5 doc, and 6 pdf files);
ATTACHMENT F Parts Sales Crossmember Complete PE08-029.xls