

Rec'd ODI  
Apr 12, 2010  
copy 2



**VIA FEDERAL EXPRESS**

April 9, 2010

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

NVS-212pco  
EA09-017

**RE: Information Request to IEE dated February 17, 2010 regarding the Occupant Classification System of 2007-2008 MY Kia Sorento Vehicles Manufactured Prior to November 27, 2007**

adresse postale  
mailing address  
Postanschrift  
IEE S.A.  
ZAE Weiergawan  
11, rue Edmond Reuter  
L-5326 Contern

Dear Ms. DeMeter:

The following is the Supplemental Response of IEE S.A. and IEE Sensing, Inc. ("IEE") to the February 17, 2010 Information Request to IEE in EA09-017 ("IR").

téléphone  
telephone  
Telefon  
+352 2454 1

e-mail/internet  
iee@iee.lu  
www.iee.lu

siège de la société  
place of registration  
Firmensitz  
Zone Industrielle  
L-6468 Echternach

capital social  
capital  
Kapital  
EUR 557.870

numero d'enregistrement  
au registre du commerce  
commercial registration  
number  
Handelsregister Nummer  
B134858, Luxembourg

numero identification TVA  
VAT identification number  
UST-Identifikations-  
Nummer  
LU 225 946 64

On March 3, 2010, IEE sent you a letter requesting a modification to the scope and timing of its response to the IR. On March 18, you sent a reply letter to IEE in which you agreed to a modification. Based on that letter, on March 25, 2010, IEE filed its initial Response to the IR, which included responses to Requests Nos. 1, 2, 3, 5 and 8, as limited by your March 18 letter.

In accordance with your letter of March 18, IEE is supplementing its initial Response by: (a) responding to Request 9 with respect to changes in IEE OC Systems in 2007-2008 MY vehicles, not including the Kia Sorento; and (b) producing documents responsive to Request No. 10 related to the 2007-2008 MY Kia Sorento.

In addition, IEE is supplementing its March 25 Response to Request Nos. 1 and 2 based upon the request of Peter Ong. Request Nos. 1 and 2 of the IR seek information concerning the identity of OEMs -- and other detailed information -- for "occupant classification systems supplied by IEE." In initially responding to these requests, IEE provided responsive information concerning complete OC Systems supplied by IEE and did not produce information where IEE acts only as a component supplier by supplying sensor mats to other OC System suppliers. After receiving IEE's March 25<sup>th</sup> response, Peter Ong discussed with Stephen Selander the scope of IEE's response to Request Nos. 1 and 2. During that discussion, Mr. Ong requested that IEE supplement its response to Requests 1 and 2 to include information relating to IEE-supplied sensor mats that are incorporated into OC Systems of other suppliers. Pursuant to Mr. Ong's request, IEE is providing supplemental information in response to Requests Nos. 1 and 2.

\*\*\*\*\*

**REQUEST NO. 1:**

1. Identify by make, model and model year, each motor vehicle sold in the United States since 2004 that had a pattern based occupant classification system supplied by IEE.

**SUPPLEMENTAL INFORMATION IN RESPONSE TO REQUEST NO. 1**

Attachment 1a is an Excel spreadsheet that contains a listing by make, model and model year of each motor vehicle sold in the United States since 2004 for which IEE supplied a sensor mat to an OC System supplier, but for which IEE did not supply the hardware or the software of the electronics containing the algorithm. This information supplements IEE's previous response to Request 1 contained in Attachment 1 of IEE's March 25<sup>th</sup> Response, which listed the vehicles containing the IEE OC Systems, consisting of both the sensor mat and the hardware and the software of the electronics containing the algorithm.

Because IEE acts as a component supplier to the OC System supplier, and is not a Tier 1 supplier, IEE cannot specify with certainty the model year vehicles into which the IEE sensor mat is incorporated. Thus, IEE has estimated the model year of the vehicles, based upon sales to its customer made on or after August 1 of the preceding calendar year (*e.g.*, sales made on or after August 1, 2006 are classified as relating to the 2007 model year).

**REQUEST NO. 2**

2. Separately, for each make, model and model year motor vehicle sold in the United States since 2004 that had a pattern based occupant classification system supplied by IEE, identify in tabular form, each subject component by:
  - a. sensor mat part name;
  - b. sensor mat part number;
  - c. OCS electronics/software/algorithm supplier name (if applicable);
  - d. OCS electronics/software/algorithm version(s) used at start of each model year vehicle (if applicable);
  - e. Tier 1 restraint supplier name (if IEE is not the Tier 1 restraint supplier); and
  - f. role of Tier 1 supplier (*i.e.*, electronics/software designer, overall seat system integrator, etc.).

**SUPPLEMENTAL INFORMATION IN RESPONSE TO REQUEST NO. 2**

Attachment 2a is an Excel spreadsheet that contains IEE's Supplemental Response to Request No. 2 related to the components in Attachment 1a. IEE does not supply the hardware or the software of the electronics or the algorithm for these vehicles. As such, columns I and J (*i.e.*, IEE Electronics Part Number, and IEE Electronics Software Version) are "N/A" for "Not Applicable." IEE is leaving columns F, G, H, K, L, and N blank because of a lack of information in IEE's possession to provide the information requested. In column M, IEE is listing the name of its customer for sensor mats.

**REQUEST NO. 9**

9. Identify and describe all hardware/software/algorithm modifications or changes made by IEE of the subject component for each make, model and model year identified by IEE in response to Request No. 1, excluding the MY 2007 and MY 2008 Kia Sorento vehicles, from the start of production to date. For each such modification or change, provide the following information:
- a. the date, or approximate date on which the modification or change was available to the Tier 1/OEM manufacturer;
  - b. a description of the modification or change;
  - c. the reason for and/or the system parameter affected by the modification or change; and
  - d. the part number and/or software version and version name.

**RESPONSE TO REQUEST NO. 9**

Attachment 9 is an Excel spreadsheet that contains IEE's response to Request 9, identifying hardware and software changes to IEE's OC System for MY 2007-2008 vehicles other than the Sorento. All of the information in Attachment 9 is Confidential Business Information entitled to confidential treatment under 49 CFR §512 and 5 U.S.C. §552(b)(4). This Attachment has been submitted to the Chief Counsel in conformance with NHTSA's regulations.

**REQUEST NO. 10**

10. Identify and provide copies of all documents reflecting any assessment, analyses, tests, test results, studies, survey, simulations, investigations inquiries and/or evaluations that relate or may relate to the problem condition with the subject components.

**RESPONSE TO REQUEST NO. 10**

IEE finds this request ambiguous because of the word "reflecting". The "reflecting" language could be read for "documents which reflect or are related to the problem condition" or could be read for documents that only "reflect" "any assessment, analysis, tests, test results, studies, surveys, simulations, investigations inquiries and/or evaluations." IEE is using a broad scope of the request and is producing those documents that appear to be responsive. Attachment 10 contains some of the documents IEE is producing in chronological order. For documents that contain multiple dates, the last date in the document was used for purposes of placing the document in order. Some of the documents that IEE is producing have no apparent date. To the extent possible, IEE has placed those documents within the general timeframe that the document was created. Documents where there is no apparent date are being produced at the beginning of the chronological order. A slip sheet separates the documents with no apparent date from the beginning of the documents in chronological order.

Many of the documents that IEE is producing are e-mail strings, which repeat previous e-mails. Because of NHTSA's definition of document, IEE believes that an e-mail string to which a new e-mail has been added is a separate document required to be produced. For that reason, many e-mails are being produced multiple times.


IEE is also producing several copies of different analyses, studies, investigations and presentations. To the extent that these documents were attached to e-mails, we have left the attachment with the e-mail.

Some of the documents we are producing are e-mails between foreign personnel within IEE. These documents are generally in English, even when the corresponding parties speak a native language other than English. IEE is producing these documents in their original form, containing original spelling and context.

Other documents originating from Korea are in Korean. These documents have been translated for this production. Because many of the documents are email strings, IEE has attempted to place the translated email string behind the original Korean document. In other cases, the translated text appears on the same page as the Korean text. IEE has marked each translated document with the word "TRANSLATED" so that NHTSA can distinguish between documents originally created in English or translated from Korean for this production.

Most of the information in Attachment 10 is Confidential Business Information entitled to confidential treatment under 49 CFR §512 and 5 U.S.C. §552(b)(4). The confidential portions of these Attachments have been submitted to the Chief Counsel in conformance with NHTSA's regulations.

If you have any questions in connection with this Supplement Response, please contact me.



Richard Paige  
Bush Seyferth & Paige PLLC  
Designated Agent for IEE