



March 11, 2009

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-2121lh, PE09-003

Dear Mr. Cooper:

This letter provides a partial response to your above referenced request for information, dated January 16, 2009. Complete responses are provided for Requests 1, 2, 3, 4, 5, 6, 7, 8, 9, 11, and 13. NHTSA has granted an extension until March 25, 2009 to provide responses to Requests 10, 12, and 14.

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 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;
- f. Indication of whether or not the vehicle is equipped with cruise control;
- g. Date warranty coverage commenced;
- h. The State in the United States where the vehicle was originally sold or leased (or delivered for sale or lease).

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

**Hyundai-Kia America Technical Center Inc.**  
6800 Geddes Road, Superior Township, MI 48198  
TEL: 734-337-9499 FAX: 734-483-5919

## Hyundai-Kia America Technical Center, Inc

### Response to Request 1.

Model Year	Production Quantities by Model									
	Accent	Azera	Elantra	Entourage	Genesis	Santa Fe	Sonata	Tiburon	Tucson	Veracruz
2005									13,624	
2006	18,686	24,497	97,312				170,789	16,344	55,402	
2007	44,800	23,953	82,724	30,052		98,376	124,922	14,022	44,484	12,665
2008	50,033	11,282	107,047	8,345		73,804	97,744	8,348	20,523	12,683
2009	7,805	1,560	3,199		7,578	5,723	100,532		527	1

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

Source: Hyundai Motor America  
Information as of February 12, 2009

### 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:

- Consumer complaints;
- Field reports, including dealer field reports;
- 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;
- Property damage claims;
- Third-party arbitration proceedings where Hyundai is or was a party to the arbitration; and
- 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 listing 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 "c" through "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 Year	Consumer Complaints by Model									
	Accent	Azera	Elantra	Entourage	Genesis	Santa Fe	Sonata	Tiburon	Tucson	Veracruz
2005									3	
2006	5	0	1				28	0	6	
2007	3	0	2	3		6	7	1	2	6
2008	1	0	1	0		0	5	0	0	0
2009	0	0	0		0	0	0		0	0

b. Field reports, including dealer field reports;

Model Year	Field Reports by Model									
	Accent	Azera	Elantra	Entourage	Genesis	Santa Fe	Sonata	Tiburon	Tucson	Veracruz
2005									0	
2006	2	0	0				12	0	7	
2007	0	1	0	8		5	8	0	1	3
2008	0	0	1	0		0	1	0	0	1
2009	0	0	0		1	0			0	0

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 Year	Reports by Model									
	Accent	Azera	Elantra	Entourage	Genesis	Santa Fe	Sonata	Tiburon	Tucson	Veracruz
2005									1	
2006	0	0	0				0	0	0	
2007	0	0	0	0		0	0	0	0	0
2008	0	0	0	0		0	0	0	0	0
2009	0	0	0		0	0	0		0	0

One insurance subrogation claim is provided because it alleges that the subject component was responsible for a frontal collision.

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d. Property damage claims, alleged to have resulted from alleged defect;

Model Year	Property Damage Claims by Model									
	Accent	Azera	Elantra	Entourage	Genesis	Santa Fe	Sonata	Tiburon	Tucson	Veracruz
2005									0	
2006	0	0	0				0	0	0	
2007	0	0	0	0		0	0	0	0	0
2008	0	0	0	0		0	0	0	0	0
2009	0	0	0		0	0	0		0	0

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

Model Year	Third Party Arbitration Proceedings by Model									
	Accent	Azera	Elantra	Entourage	Genesis	Santa Fe	Sonata	Tiburon	Tucson	Veracruz
2005									0	
2006	0	0	0				0	0	1	
2007	0	0	0	0		0	0	0	0	0
2008	0	0	1	0		0	0	0	0	0
2009	0	0	0		0	0	0		0	0

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

Model Year	Lawsuits by Model									
	Accent	Azera	Elantra	Entourage	Genesis	Santa Fe	Sonata	Tiburon	Tucson	Veracruz
2005									0	
2006	0	0	0				1	0	0	
2007	0	0	0	0		0	0	0	0	0
2008	0	0	0	0		0	0	0	0	0
2009	0	0	0		0	0	0		0	0

Source: Hyundai Motor America

Information as of February 19, 2009 for 2a, January 23, 2009 for 2b, February 12, 2009 for 2c, 2d, and 2f, and as of March 6, 2009 for 2e.

See Attachment A for requested summary information

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Request 3.

Provide the information described in Requests No. 1 and 2 for any other Hyundai model year vehicles that share the subject components and/or problems. Provide the information broken down by model and model year.

Response to Request 3.

Information related to other Hyundai models and model years is included in the Responses to Requests 1 and 2.

Request 4.

Separately, for each item (complaint, report, claim, notice, or matter) within the scope of your response to Request No. 2, state the following information and segregate the complaints by, complaints of brake lamp failure, brake lamp switch failure, improper operation of the BTSI, the ABS (including those indicated by illumination of the ABS warning light), the ESC (including those indicated by illumination of the ESC warning light), or the cruise control:

- 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 4.

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

Source: Hyundai Motor America

Information as of February 19, 2009 for Consumer Complaints, January 23, 2009 for Field Reports, and as of February 12, 2009 for other materials.

## Hyundai-Kia America Technical Center, Inc

### Request 5.

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 5.

See Attachment B for requested consumer complaint information organized by file number. See Attachment C for requested field report information. Field reports are identified by VIN. See Attachment D for requested subrogation claim report. The subrogation claim report is identified as Subrogation Claim KM8JM12BX5U229861. See Attachment E for requested third party arbitration information. Arbitration materials are identified as Arbitration HYU0736154 and Arbitration HYU0933133. See Attachment F for requested lawsuit information. The lawsuit is identified as Warranty Lawsuit 5NPEU46F16H [REDACTED]

Source: Hyundai Motor America

Information as of February 19, 2009 for Attachment B, January 23, 2009 for Attachment C, February 12, 2009 for Attachments D and F, and March 6, 2009 for Attachment E.

### Request 6.

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 6.**

Model Year	Warranty Claims by Model									
	Accent	Azera	Elantra	Entourage	Genesis	Santa Fe	Sonata	Tiburon	Tucson	Veracruz
2005									1,670	
2006	1,538	179	605				21,749	216	5,653	
2007	900	265	68	1,066		2,467	6,347	68	834	1,196
2008	37	54	6	21		299	919	6	105	341
2009	0	1	0		4	0	86		1	0

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

Source: Hyundai Motor America  
Information as of February 12, 2009

**Request 7.**

Describe in detail the search criteria used by Hyundai to identify the claims identified in response to Request No. 6, 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 7.**

The claims were identified by searching for warranty claims containing information for the replacement of stop lamp switch assembly part numbers 93810-3K000, 93810-2E000, and 93810-0W000 in all model and model year Hyundai vehicles in which those switches were installed in production. Hyundai did not limit the warranty claims for stop lamp switch replacement to those with a particular labor operation code, cause code or nature code; therefore, all warranty claims for switch replacement for any reason are included.

Please see Attachment G for a list of all labor operations, labor operation descriptions, problem codes, and problem code descriptions that were associated with the warranty replacement of the stop lamp switch.

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. Brake lamp switches are covered by the Hyundai New Vehicle Limited Warranty.

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Certain Hyundai extended warranty options provide coverage for brake lamp switches. No extended warranty claims have been filed for the subject components.

Source: Hyundai Motor America  
Information as of January 16, 2009

**Request 8.**

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 8.**

Please see Attachment H for requested information.

Source: Hyundai Motor America  
Information as of March 6, 2009

**Request 9.**

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.



**Hyundai-Kia America Technical Center, Inc**

Response to Request 9.

See Attachment I containing fourteen Quality Information Reports and attachments for requested information.

Source: Hyundai Motor Company  
Information as of January 30, 2009

Request 10.

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(s)/assembly or components that may impinge on or affect the subject components, from the start of production to date, which relate to, or may relate to, the alleged defect in the subject 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 numbers (service and engineering) of the original component;
- e. The part number (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;
- i. The models and model years of vehicles affected by the modification.

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 10.

Extension granted until March 25, 2009 to respond to this request.

Request 11.

Produce or provide one of each of the following:

- a. Any kits that have been released, or developed, by Hyundai for use in service repairs to the subject or related components/assemblies which relate, or may relate, to the alleged defect in the subject vehicles;
- b. Engineering drawings of the entire brake lamp switch system and its components.
- c. One sample of each brake lamp switch used for the subject vehicles.

**Hyundai-Kia America Technical Center, Inc**

**Response to Request 11.**

- a. No kits have been released, or developed, by Hyundai for use in service repairs to the subject or related components/assemblies which relate, or may relate, to the alleged defect in the subject vehicles;
- b. Engineering drawings are provide in Attachment J, as follows:
  - SWITCH ASSY – STOP LAMP 93810-3K000
  - SWITCH ASSY – STOP LAMP 93810-2E000
  - SWITCH ASSY – STOP LAMP 93810-0W000
- c. Exemplar samples have been shipped separately as Attachment K.

Source for 11a and 11b: Hyundai Motor Company  
Information as of March 10, 2009

Source for 11c: Hyundai Motor America  
Information as of March 10, 2009

**Request 12.**

Describe the operational functioning of the subject component and its interaction with the systems and operations potentially affected by the alleged defect as described on page 2.

**Response to Request 12.**

Extension granted until March 25, 2009 to respond to this request.

**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(s)/assemblies; 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.

**Hyundai-Kia America Technical Center, Inc**

Response to Request 13.

See Attachment L for requested part sales information of subject components. No kits have been released or developed.

Source: Hyundai Motor America  
Information as of February 9, 2009

Supplier Information:

INFAC Corporation  
732-2 Wonsi-Dong, Danwon-Gu, Ansan-Si, Gyeonggi-Do, Korea

Source: Hyundai Motor Company  
Information as of February 27, 2009

Request 14.

Furnish Hyundai'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;
- 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 March 25, 2009 to respond to this request.

Please let me know if you have any questions about the information provided in this letter.

Sincerely,



Robert Babcock  
Senior Manager, Regulation and Certification Department

**Hyundai-Kia America Technical Center, Inc**

**Attachments:**

Two CDs, each containing:

PRODUCTION DATA.mdb;  
REQUEST NUMBER TWO DATA.mdb;  
WARRANTY DATA.mdb;  
ATTACHMENT A Summary Information.xls;  
ATTACHMENT B Consumer Complaints.xls;  
ATTACHMENT C Field Reports (containing 51 Field Report pdf files);  
ATTACHMENT D Subrogation Report (1 pdf file);  
ATTACHMENT E Third Party Arbitrations (containing 2 pdf files);  
ATTACHMENT F Warranty Lawsuit (1 pdf file);  
ATTACHMENT G Warranty Data Related Codes.doc;  
ATTACHMENT H Bulletins and Information (containing 3 pdf files);  
ATTACHMENT I Quality Information Reports (containing 29 pdf files);  
ATTACHMENT L Part Sales Information.xls

ATTACHMENT J Engineering Drawings:

SWITCH ASSY – STOP LAMP	93810-3K000
SWITCH ASSY – STOP LAMP	93810-2E000
SWITCH ASSY – STOP LAMP	93810-0W000

Note: ATTACHMENT K Parts Shipped Separately