

HONDA

American Honda Motor Co., Inc.
1919 Torrance Boulevard
Torrance, CA 90501-2746
Phone (310) 783-2000

July 24, 2009

NVS-213Hkb
PE09-024

Mr. Jeffrey L. Quandt, Chief
Vehicle Control Division
Office of Defects Investigation
U.S. DEPARTMENT OF TRANSPORTATION
National Highway Traffic Safety Administration
1200 New Jersey Ave., SE
Washington, DC 20590

2009 JUL 31 AM 8:08

Dear Mr. Quandt:

In reply to your letter dated May 20, 2009, we are submitting our response regarding the allegations of soft or low brake pedals in model year (MY) 2006 through 2008 Honda Odyssey minivans. We have provided information for only the following vehicles because they are equipped with a VSA modulator: 2006-08 Odyssey (all trim levels), 2003-07 Accord V6 (2-dr & 4-dr), 2005-07 Accord Hybrid and 2007-08 Element.

1. State, by model, engine and model year, the number of subject and peer 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) Model;
 - c) Engine;
 - 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." See Enclosure 1, Data Collection Disc, for a pre-formatted table that provides further details regarding this submission.

Response:

The data elements "a" through "g" are provided in the file titled "PRODUCTION DATA" on the enclosed CD. There are separate tables for each model.

Model	Model Year	Sales
Odyssey	2006	192,910
	2007	207,888
	2008	136,036
Accord V6	2003	142,071
	2004	127,324
	2005	99,378

	2005	23	112	1	0	0	0	2
	2006	14	25	2	0	0	0	0
	2007	16	48	0	0	0	0	1
Accord Hybrid	2005	2	24	0	0	0	0	0
	2006	0	0	0	0	0	0	0
	2007	0	3	0	0	0	0	0
Element	2007	26	140	0	0	0	0	2
	2008	15	87	0	0	0	0	0

Source(s): Customer Relations, Tech Line, Field Reports, Claims and Lawsuits.
 As of: July 15, 2009

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:
- Honda's file number or other identifier used;
 - The category of the item, as identified in Request No. 2 (i.e., consumer complaint, field report, etc.);
 - Vehicle owner or fleet name (and fleet contact person);
 - Vehicle owner's address;
 - Vehicle owner's contact telephone number(s);
 - Vehicle's VIN;
 - Vehicle's model;
 - Vehicle's model year;
 - Vehicle's mileage at time of incident;
 - Incident date;
 - Report or claim date;
 - Whether a crash is alleged;
 - Whether a fire is alleged;
 - Whether property damage is alleged;
 - Number of alleged injuries, if any; and
 - Number of alleged fatalities, if any.

Provide this information in Microsoft Access 2000, or a compatible format, entitled "REQUEST NUMBER TWO DATA." See Enclosure 1, Data Collection Disc, for a pre-formatted table that provides further details regarding this submission.

Response:

The data elements "a" through "p" are provided in the file titled "REQUEST NUMBER TWO DATA" on the enclosed CD.

Source(s): Customer Relations, Tech Line, Field Reports, Claims and Lawsuits.
 As of: July 15, 2009

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:

See Attachment #Q4 for copies of all documents on enclosed CD.

	2006	130	9	0	0
	2007	252	7	0	0
Accord Hybrid	2005	35	6	0	0
	2006	11	4	0	0
	2007	6	1	0	0
Element	2007	195	4	0	0
	2008	211	1	0	0

Source(s): Warranty claim data.
 As of: July 15, 2009

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 extended warranty.

Response:

Search Criteria: Using warranty data for all subject and peer vehicles, claims were pulled based on the VSA modulator assembly part number. The contention text description was reviewed for each claim to identify the following symptoms: 1) soft or spongy brake pedal feel; 2) low brake pedal or longer than expected pedal travel; 3) poor brake response; 4) air in brake system from subject components or other sources; or 5) any other subject components malfunctions.

Coding and Descriptions: See Attachment #Q6

Warranty Coverage: All subject and peer vehicles are covered by a new vehicle limited warranty for three years or 36,000 miles, whichever comes first. Under the terms of the new vehicle limited warranty, Honda will repair or replace any part that is defective in material or workmanship under normal use. This warranty covers all systems except emission control systems, accessories, battery, tires or IMA which have their own warranties. Honda has not issued extended warranty coverage related to the alleged defect in any of the subject or peer vehicles.

Source(s): Warranty claim data.
 As of: July 17, 2009

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.

- d. *Analysis of actual parts from market failures, determination of failure cause and countermeasure.*
- e. *Engineering group : HAM Market Quality (MQ)
Supplier : Continental-TEVES AG*
- f. *Negative pressure (vacuum) may be generated generated in the hydraulic circuit while the pump is actuated during initial diagnostics and may allow air to enter the circuit, resulting in a gradual increase in pedal stroke.*

Document 4 : Quality improvement sheet (QIS) for the peer vehicle (Accord)

- a. *QIS (MV20050125075609)*
- b. *January 25, 2005*
- c. *December 6, 2005*
- d. *Analysis of actual parts from market failures, determination of failure cause and countermeasure.*
- e. *Engineering group : Honda Auto Quality Analysis Office(AQAO)
Supplier : Nissin Kogyo Co., Ltd.*
- f. *An electrical short caused by slight scratches on the CAN driver IC in the ECU is the cause of failure.*

Document 5 : Quality improvement sheet (QIS) for the peer vehicle (Accord)

- a. *QIS (MV20070607164145)*
- b. *June 7, 2007*
- c. *July 10, 2007*
- d. *Analysis of actual parts from market failures, determination of failure cause and countermeasure.*
- e. *Engineering group : Honda Auto Quality Analysis Office(AQAO)
Supplier : Nissin Kogyo Co., Ltd.*
- f. *The failure is caused by the ECU diagnostics resulting in a failure of the VSA regulator valve.*

9. Describe all modifications or changes made by, or on behalf of, Honda in the design, material composition, manufacture, quality control, supply, installation or routing of 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.

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.

Response:

No manufacturing changes occurred during the specified time, however design changes are outlined in Attachment #Q9 and summarized below.

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) ABS modulator control unit;
- b) TCS modulator control unit; and
- c) VSA modulator control unit.

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 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:

See Attachment #Q10

Supplier Contact Information

Continental Automotive GmbH Quality Automotive
One Continental Drive
Auburn Hills, Michigan 48326
Director, Quality Key Account Management : David Cwycyshyn
(248) 393-5451

Nissin Brake Ohio, Inc.
1901 Industrial Drive
P.O. Box 886
Findlay, Ohio 45839-0886
Senior Vice President/Plant Manager : Larry Robinson
Warranty Quality staff : Jonna Siferd
Customer Quality staff : Tammy Jeknavorian
(419) 425-6725

Nissin Kogyo Co., Ltd.
840 Kokubu, Ueda, Nagano
386-8505 Japan
Operating Officer: Takayoshi Shinohara
+81 268 24 3111

11. Provide three field return samples of the subject component used in the MY 2007 through 2008 Honda Odyssey vehicles that exhibit the condition described in the subject bulletin. The samples provided should be representative of the "worst case" condition for the rate and/or volume of air leakage into the brake system.

Response:

Three field return samples of the subject component will be mailed separately.

12. Provide the following information regarding the subject vehicle brake system, the subject component and the alleged defect:

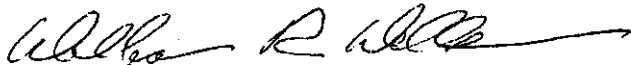
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pedal feel and height of the brake pedal. These changes should alert the driver that the brake system requires maintenance if they are concerned about them, and due to the gradual change drivers are provided ample notice that this change is occurring.

f. *Honda's assessment of the reports included in this response is included in Attachment #Q13f.*

Sincerely,

AMERICAN HONDA MOTOR CO., INC.



William R. Willen
Managing Counsel
Product Regulatory Office

WRW:nis

Attachments

HONDA

American Honda Motor Co., Inc.
1919 Torrance Boulevard
Torrance, CA 90501-2746
Phone (310) 783-2000

July 28, 2009

Office of the Chief Counsel
U.S. DEPT. OF TRANSPORTATION
National Highway Traffic Safety
Administration
1200 New Jersey Ave., SE
Washington, DC 20590

**Re: PE09-024 2006-08 Honda Odyssey soft or low brake pedal
Request for Confidentiality**

Dear Chief Counsel:

Enclosed herewith is a Request for Confidentiality submitted for your review and consideration.

Specifically, we are requesting permanent confidential treatment for the following attachment documents in our response to EA09-001:

Attachment	Pages requesting confidentiality
Q8 Document 1	p. 1-2
Q8 Document 2	p. 1-2
Q8 Document 3	p. 1-2
Q8 Document 4	p. 1
Q8 Document 4 Attachment	p. 1-2, 4
Q8 Document 5	p. 1
Q8 Document 5 Attachment	p. 1-10
Q9 Document 1	p. 1
Q9 Document 2	p. 1
Q12a	p. 1-10
Q12b	p. 1-4
Q12c	p. 1-7
Q12d	p. 1
Q12e	p. 1-6
Q13f	p. 1

The attachments are proprietary data containing information regarding internal assessments and analyses, design and performance specifications, modification