



September 25, 2009

Ref

Kia supplied CD to MSO 2003 format to replace orig MSO 2007 format Return O.

VIA FEDERAL EXPRESS

D. Scott Yon, 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 D.C. 20590

Re: Preliminary Evaluation (PE09-034)
Passenger Air Bag System (MY) 2007-2008 Kia Sorento

Dear Mr. Yon:

This letter is submitted in response to your letter of August 4, 2009 sent to Hyundai Technical America Technical Center, Inc. ("HATCI") (Reference NVS-212pco/PE09-034). That letter requested information regarding allegations of improper operation of the passenger airbag occupant classification system in the 2007-2008 MY Kia Sorento vehicles. Although HATCI is an organization independent of both Kia Motors Corp. ("KMC") and Kia Motors America, Inc. ("KMA"), it has been designated by those organizations to act as their communication liaison with the National Highway Traffic Safety Administration ("NHTSA"). This response is submitted to NHTSA by HATCI in that limited role.

INTRODUCTORY STATEMENT

We are providing responses to requests 1-7 and 12 contained in your August 4th letter and KMA is consulting with KMC and its vendors to be able to provide ODI with a response to all remaining requests in a timely manner. However, we believe that the following observations can be made based on the documents included with this interim response and based on KMA's current understanding of events. Although cast as a safety investigation, Kia believes that ODI is investigating issues covered by FMVSS 208, where the 2007 - 2008 Sorento OCS suppresses the airbag in accordance with the testing requirements of that Standard and is thus a complying design. As NHTSA advised the industry in 2005, "[t]he design of these [OCS] systems may vary depending on a number of different parameters, as long as the system adequately suppresses the air bag when tested in accordance with the requirements of FMVSS No. 208." Denial of Petition for Rulemaking to Restrict CRS Weights, 70 FR 61908, 61910 (October 27, 2005).

Production of the 2007 Sorento commenced in May 2006. Pursuant to the current version of Appendix A to FMVSS 208, the OCS needed to recognize the Britax Expressway ISOFIX CRS. After

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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.