

INFORMATION Redacted PURSUANT TO THE FREEDOM OF **HONDA**  
INFORMATION ACT (FOIA), 5 U.S.C. 552(B)(6)

**American Honda Motor Co., Inc.**  
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FEB 2 2011

January 21, 2011

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

**Re: DP10-004**  
**2005-07 Accord Hybrid (subject vehicle)**  
**2003-2010 Civic Hybrid (peer vehicle)**  
**Hybrid Braking Systems**

Dear Mr. Quandt:

In reply to your letter dated November 24, 2010, we are submitting our response regarding the allegations of reduced braking performance and/or braking failures in model year (MY) 2005-2007 Accord Hybrid (subject vehicle) and model year (MY) 2003-2010 Civic Hybrid (peer vehicle).

1. **State, by model and model year, the number of subject vehicles Honda has manufactured for sale or lease in the United States. Separately, for each subject vehicle and peer vehicle manufactured to date by Honda, 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 2003 or 2007, or a compatible format, entitled "PRODUCTION DATA." See Enclosure 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.*

<b>Model</b>	<b>Model Year</b>	<b>Sales</b>
Accord Hybrid	2005	19,144
	2006	4,208
	2007	3,814
Civic Hybrid	2003	32,509
	2004	22,803

	2005	26,982
	2006	31,120
	2007	32,491
	2008	31,993
	2009	19,103
	2010	7,950

2. State the number of each of the following, received by Honda, or of which Honda is otherwise aware, which relate to, or may relate to, the alleged defect in the subject vehicles and the peer 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 Honda is or was a party to the arbitration; and
- f) Lawsuits, both pending and closed, in which Honda 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 description of the alleged problem and causal and contributing factors and Honda'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.

Response:

The total number of reports for items "a" through "d" are stated in the table below. See Attachment #Q2 on enclosed CD for summary description for items "c" through "f".

Note: Honda does not have any fleets.

Model	Model Year	A Owner/ Fleet Reports	B Field/ Dealer Reports	C Crash, Injury, Fatality Reports	D Property Damage	E Third-Party Arbitration	F Lawsuits
Accord Hybrid	2005	7	55	1	0	0	0
	2006	2	1	0	0	0	0
	2007	1	3	0	0	0	0
Civic Hybrid	2003	10	0	3	0	0	0
	2004	10	1	7	4	4	1
	2005	5	2	0	0	0	0
	2006	8	39	3	0	1	0
	2007	11	29	6	1	0	1
	2008	4	14	2	0	0	0
	2009	0	4	0	0	0	0
2010	2	0	0	0	0	0	

Source(s): Customer Relations, Tech Line, Field Reports, Claims and Lawsuits.  
As of: Dec. 3, 2010

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) Honda'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;
  - f) Vehicle's model;
  - g) Vehicle's model year;
  - h) Vehicle's mileage at time of incident;
  - i) Incident date;
  - j) Report or claim date;
  - k) Whether a crash is alleged;
  - l) Whether property damage is alleged;
  - m) Number of alleged injuries, if any; and
  - n) Number of alleged fatalities, if any.

Provide this information in Microsoft Access 2003 or 2007, or a compatible format, entitled "REQUEST NUMBER TWO DATA." See Enclosure Data Collection Disc, for a pre-formatted table that provides further details regarding this submission.

Response:

*The data elements "a" through "n" are provided in the file titled "REQUEST NUMBER TWO DATA" on the enclosed CD. We are also providing additional complaints and reports which may relate to the alleged defect. The following three categories will be included in the "REQUEST NUMBER TWO DATA" CD as separate tables: Unintended Acceleration, Auto Stop and Battery not Charging. Also, please note that these separate categories were not included in the counts for question no. 2.*

Source(s): Customer Relations, Tech Line, Field Reports, Claims and Lawsuits.  
As of: Dec. 3, 2010

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 the enclosed CD.*

*The documents are organized by category (i.e., consumer complaints, field reports, etc.) and within each category the documents are organized by model year then in sequential order by the last six digits of the VIN.*

Source(s): Customer Relations, Tech Line, Field Reports, Claims and Lawsuits.  
As of: Dec. 3, 2010

5. State, by model and model year, a total count for all of the following categories of claims, collectively, that have been paid by Honda to date that relate to, or may relate to, the alleged defect in the subject vehicles and the peer vehicles: warranty claims; extended warranty claims; claims for goodwill 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) Honda's claim number;
- b) Vehicle owner or fleet name;
- c) Vehicle owner address (and fleet contact person);
- d) Vehicle owner contact telephone number;
- e) VIN;
- f) Vehicle model;
- g) Model Year;
- h) Repair date;
- i) Vehicle mileage at time of repair;
- j) Repairing dealer's or facility's name, telephone number, city and state or ZIP code;
- k) Labor operation number;
- l) Problem code;
- m) Replacement part number(s) and description(s);
- n) Concern stated by customer;
- o) Comment, if any, by dealer/technician relating to claim and/or repair.

Provide this information in Microsoft Access 2003 or 2007, or a compatible format, entitled "WARRANTY DATA." See Enclosure Data Collection Disc, for a pre-formatted table that provides further details regarding this submission.

Response:

The total warranty counts are provided in the table below. The data elements "a" through "o" are provided in the file titled "WARRANTY DATA" on the enclosed CD.

Model	Model Year	Warranty Claims	Extended Warranty	Goodwill Claims	Technical Service Bulletin/ Campaign
Accord Hybrid	2005	34	0	0	53
	2006	6	0	5	17
	2007	5	0	2	0
Civic Hybrid	2003	2	0	0	0
	2004	5	0	1	0
	2005	0	0	0	0
	2006	13	0	2	0
	2007	4	0	1	0
	2008	4	0	0	0
	2009	2	0	0	0
	2010	1	0	0	0

Source(s): Warranty claim data.  
 As of: Dec. 2, 2010

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 Brake Assembly, Electronic Control Unit and Engine Control Module part numbers. The contention text description was reviewed for each claim to identify reduction in braking performance and/or braking failures as well as 1) unintended acceleration; 2) auto stop not working or 3) battery not charging – as noted in our response to question number three.*

*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 or tires which have their own warranties.*

*All subject and peer vehicles are also covered by the Integrated Motor Assist (IMA) system warranty and the Federal/California emissions warranties. Warranty duration varies depending on part and type of emission warranty, but is never less than the basic vehicle three year or 36,000 mile warranty and for most IMA components exceeds the basic warranty. We can provide a warranty coverage booklet with additional details at your request.*

*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: Dec. 3, 2010*

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.

Response:

*See Attachment #Q7*

*Currently no communication is planned within the next 120 days.*

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 and the peer vehicles that have been conducted, are being conducted, are planned, or are being planned by, or for, Honda. 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.

Response:

*The summaries below describe the four documents found in Attachment #Q8:*

*Document 1: Quality Improvement Sheet (QIS)*

- a) *Action title or identifier; MV20090324113341(Heavy brake pedal when cold start < QAH3092 >)*
- b) *The actual or planned start date; March 24, 2009*
- c) *The actual or expected end date; March 30, 2010*
- d) *Brief summary of the subject and objective of the action;*
  - i. *Recreation test using the component with the alleged defect from the owner's vehicle (returned part: TUBE ASSEMBLY, MASTER POWER)*
  - ii. *Performance investigation of the returned part(TUBE ASSEMBLY, MASTER POWER)*
  - iii. *Disassembly and internal investigation of the returned part (TUBE ASSEMBLY, MASTER POWER)*
  - iv. *It appears that in the manufacturing process of the TUBE ASSEMBLY, MASTER POWER the sealing surface for the check valve that allows vacuum to assist during service brake operation, the valve surface may have become contaminated with the mold release agent and this may inhibit valve performance of the returned part.*
  - v. *Recreation testing with the contaminant materials used in TUBE ASSEMBLY, MASTER POWER manufacturing process were also found in the matter adhered to the check valve seal surface*
  - vi. *Dimensional accuracy measurement of check valve confirmed it was within specification*
  - vii. *An investigation of any possible manufacturing cause of check valve contamination was conducted.*
  - viii. *Recreation testing after the SPEC durability testing of the check valve was conducted.*
- e) *Engineering group(s)/supplier(s) responsible for designing and for conducting the action;*
  - *Honda Motor Co., Ltd, Auto Quality Innovation Division, Auto Quality Analysis Office*

- Nichirin Co., Ltd.
  - Nissin Kogyo Co., Ltd.
- f) A brief summary of the findings and/or conclusions resulting from the action.  
It was confirmed that the valve opening pressure increase of the check valve within TUBE ASSEMBLY, MASTER POWER can lead to the heavy brake pedal claimed for this vehicle. Also, siloxane and fatty acid were found on the seal surface of check valve. The investigation of the TUBE ASSEMBLY, MASTER POWER manufacturing process found that the subsidiary materials including siloxane and fatty acid were used. Recreation testing of the increased check valve opening pressure was conducted with these subsidiary materials on the check valve sealing surface, however the increased opening valve pressure was not confirmed. Therefore, it can be judged that the cause is not the subsidiary materials used in manufacturing process. We were unable to identify the cause.

Document 2: Quality Improvement Sheet (QIS)

- a) Action title or identifier; MV20050125075609
- b) The actual or planned start date; January 25, 2005
- c) The actual or expected end date; December 6, 2005
- d) Brief summary of the subject and objective of the action;
  - i. Confirm the customer contention with the returned part (modulator ASSEMBLY. (TCS))
  - ii. Confirm inside of ECU of the returned part (modulator ASSEMBLY. (TCS))
  - iii. Manufacturing cause investigation of ECU
- e) Engineering group(s)/supplier(s) responsible for designing and for conducting the action;
  - Honda Motor Co., Ltd, Auto Quality Innovation Division, Auto Quality Analysis Office
  - Nissin Kogyo Co., Ltd.
- f) A brief summary of the findings and/or conclusions resulting from the action.  
Based on analysis of the returned part, we were unable to confirm that the ABS/brake warning lamp would illuminate, however the DTC68-21 input was confirmed by installing the returned component from the suspect vehicle on another test vehicle. A detailed inspection of the ECU found a scratch on the wiring of the CAN driver IC board. The investigation of the cause of the scratch on the IC driver board determined that it did not match the scratch on the part returned from the suspect vehicle. Scratches to the IC board would not result in the alleged symptom and would have been discovered in the vehicle pre-delivery inspection process. We were unable to identify the cause of the scratch on the returned part.

Document 3: Quality Improvement Sheet (QIS)

- a. Action title or identifier; MV20070607164145(VSA modulator DTC 121-21(TCS solenoid) comes on <QAH2155>)
- b. The actual or planned start date; June 7, 2007
- c. The actual or expected end date; July 10, 2007
- d. Brief summary of the subject and objective of the action;
  - i. Confirm the symptom with the claimed vehicle

- ii. Conduct FTA of software for the cause of DTC121-21
- e. Engineering group(s)/supplier(s) responsible for designing and for conducting the action;
  - Honda Motor Co., Ltd, Auto Quality Innovation Division, Auto Quality Analysis Office
  - Honda R&D Co., Ltd.

- f. A brief summary of the findings and/or conclusions resulting from the action.  
By way of confirming the customer's contention, it was confirmed that DTC121-21 could occur depending on the technique of applying the brake pedal. According to the result of cause investigation FTA, if the conclusion of Creep Aid System (CAS) control coincides with solenoid diagnosis timing, the diagnosis is supposed to be stopped, however the diagnosis is conducted due to the SPEC, which causes the failure.

The SPEC was changed to conduct the comparison (self-diagnosis check) with valve monitor during solenoid diagnosis only, which was applied to service parts from July 13, 2007 since mass production for vehicles had already been completed at that time.

Additional detail on this change is described as "Change 1" on pages 11 and 12 of this document.

#### Document 4: Quality Improvement Sheet (QIS)

- a. Action title or identifier; MV20051220090416(Brake warning lamp comes on)
  - b. The actual or planned start date; December 20, 2005
  - c. The actual or expected end date; March 10, 2006
  - d. Brief summary of the subject and objective of the action;
    - i. Confirm the symptom with the claimed vehicle
    - ii. Analyze the hydrostatic booster ECU data of the claimed vehicle
    - iii. Suzuka factory inspection history investigation
  - e. Engineering group(s)/supplier(s) responsible for designing and for conducting the action;
    - Honda Motor Co., Ltd, Auto Quality Innovation Division, Auto Quality Analysis Office
    - Honda R&D Co., Ltd
  - f. A brief summary of the findings and/or conclusions resulting from the action.  
From the result of hydrostatic booster ECU data from the vehicle with the contention, it was confirmed that EEPROM had manufacturer shipping status or not-inspected status from the Suzuka factory where it had been built. The investigation found that there was no history of "not-inspected" status, "inspection incomplete" status or ECU replacement and we were not able to identify the cause of this isolated not-inspected ECU status.
9. Describe all modifications or changes made by, or on behalf of, Honda in the design, material composition, manufacture, quality control, supply, or installation of the subject component from the start of production to date, which relate to, or may relate to, the alleged defect in the subject vehicles and the peer 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 Honda is aware of which may be incorporated into vehicle production within the next 120 days.

Response:

*Various manufacturing changes were applied during mass production of these models, all of which are described below.*

*Change 1: MY2008 Civic Hybrid: The countermeasure was applied to prevent an unsoldered condition within the Hydraulic Servo assembly of the IMA power unit motor.*

- a) *The date or approximate date on which the modification or change was incorporated into vehicle production - February 28, 2008*
- b) *A detailed description of the modification or change*
  - *The procedure for soldering replacement wires within the hydraulic servo assembly was changed so that the assembly would not need to be removed from the assembly workbench station to complete the procedure.*
  - *Manufacturing procedures for soldering line replacement were specified in the factory operation standard and the instruction were provided to manufacturing associates.*
  - *Equipment was changed to prevent any unsoldered hydraulic servo assembly from proceeding to the next assembly process until it could be confirmed that the required soldering had been completed.*
  - *Soldering confirmation was added to the following process of the soldering.*
- c) *The reason(s) for the modification or change;*
  - *To prevent the installation of unsoldered motors in mass production vehicles*
- d) *The part number(s) (service and engineering) of the original component:*
  - *57300-SNC-A03(service), 57300-SNC-A030-M1(engineering)*
- e) *The part number(s) (service and engineering) of the modified component:*
  - *Part number remains the same due to manufacturing change: 57300-SNC-A03(service), 57300-SNC-A030-M1(engineering)*
- f) *Whether the original unmodified component was withdrawn from production and/or sale, and if so, when:*
  - *The new procedure was implemented as a running change in the production process on February 27, 2008. As this process change was not based on any design change, and should not have any affect on performance other than enhancing or helping to assure durability, the original part number was maintained.*
- g) *When the modified component was made available as a service component:*
  - *Service parts reflecting this process change were stocked in inventory beginning on January 16, 2009 and were sold to customers starting on that date.*

*h) Whether the modified component can be interchanged with earlier production components.*

- *The modified components are interchangeable with the earlier production components. As this modification only reflects a process change that should have no affect on performance of the component, the earlier part number was maintained.*

*Change 2: A countermeasure to prevent the intrusion of foreign material into the VSA Modulator Assembly was applied to all versions of the MY2010 Civic.*

*a) The date or approximate date on which the modification or change was incorporated into vehicle production - October 5, 2009*

*b) A detailed description of the modification or change:*

- *A manufacturing instruction was added to specify that associate's fingers must be cleaned with a chamois skin after retrieving any dropped object to prevent transfer of dirt or debris into components sensitive to the intrusion of foreign materials.*

*c) The reason(s) for the modification or change;*

- *The manufacturing instruction was added after detection of foreign material had been discovered in a TCS modulator assembly.*

*d) The part number(s) (service and engineering) of the original component;*

- *57110-SNC-G12(service), 57110-SNC-G120-M1(engineering)*

*e) The part number(s) (service and engineering) of the modified component;*

- *Part number remains the same due to manufacturing change:  
57110-SNC-G12(service), 57110-SNC-G120-M1(engineering)*

*f) Whether the original unmodified component was withdrawn from production and/or sale, and if so, when:*

- *This process was implemented on July 11, 2009. The original unmodified component was not withdrawn from production or sale, as there was no trend of failure or identification of a loss of function related to this manufacturing instruction to production associates. Accordingly, the part number was not changed.*

*g) When the modified component was made available as a service component;*

- *Components reflecting this manufacturing process change were stocked as service parts starting on August 5, 2008. As this manufacturing instruction to associates is not related to any design change or specific loss of performance, the part number was not changed.*

*h) Whether the modified component can be interchanged with earlier production components:*

- *The modified components are interchangeable with earlier production components.*

*Change 3: The method of cleaning the inside of a Master Power Tube (vacuum tube for the brake booster) was changed for all versions of the MY2005 Accord and MY2005 Civic.*

*a) The date or approximate date on which the modification or change was incorporated into vehicle production:*

- 05M ACCORD: May 23, 2005
  - 05M CIVIC: June 1, 2005
  - b) A detailed description of the modification or change;
    - A change was applied to improve cleansing process for the internal surface of the Master Power Tube to clean away the production mold release agent.
  - c) The reason(s) for the modification or change;
    - This change was applied to improve the parts quality from the component supplier and prevent any possibility of loss of check valve performance due to presence of the production mold release agent.
  - d) The part number(s) (service and engineering) of the original component;
    - 05M ACCORD: 46402-SDR-A04(service), 46402-SDR-A040-M1(engineering)
    - 05M CIVIC: 46402-S5B-A01(service), 46402-S5B-A011-M1(engineering)
  - e) The part number(s) (service and engineering) of the modified component;
    - Part number remains the same due to manufacturing change:  
05M ACCORD: 46402-SDR-A04(service), 46402-SDR-A040-M1(engineering)  
05M CIVIC: 46402-S5B-A01(service), 46402-S5B-A011-M1(engineering)
  - f) Whether the original unmodified component was withdrawn from production and/or sale, and if so, when:  
Production end dates:
    - 05M ACCORD: May 22, 2005
    - 05M CIVIC: May 31, 2005
- The change that was implemented was neither a design change or a change that would affect vehicle or component performance. The manufacturing process change that was applied was intended to help prevent the remote possibility of contamination due to a specific manufacturing process. Accordingly, it was not necessary to change the part number to reflect this part of ongoing efforts to assure reliability of performance.
- g) When the modified component was made available as a service component;
    - Delivery date to parts department: Applied from brought in product from parts department
  - h) Whether the modified component can be interchanged with earlier production components:
    - The modified components are interchangeable with earlier production components of the same part number.

In addition, we are providing an explanation of the following design changes, even though they are not directly related to the performance of the vehicle in the allegations included in the defect petition. This information is being provided as reference material.

Change 1: Creep Aid System (CAS) control time of TCS modulator was changed in MY2005 Accord Hybrid.

- a) The date or approximate date on which the modification or change was incorporated into vehicle production - January 8, 2005
- b) A detailed description of the modification or change:
  - CAS control time was reduced from 450 (msec) to 200 (msec). This change to the CAS was intended to improve marketability by helping the Accord Hybrid operate in a manner more similar to a conventional internal combustion engine passenger car.

- c) *The reason(s) for the modification or change:*
  - *This change to the CAS hold time was applied to help the Accord Hybrid perform in a manner more similar to a conventional internal combustion engine passenger car. The objective of the change was for the CAS to be less noticeable to the driver during normal operation of the vehicle.*
- d) *The part number(s) (service and engineering) of the original component:*
  - *Engineering part number: 57110-SDR-A211-M1*
  - *Service part number: 57110-SDR-A21*
- e) *The part number(s) (service and engineering) of the modified component:*
  - *Engineering part number: 57110-SDR-A220-M1*
  - *Service part number: 57110-SDR-A22*
- f) *Whether the original unmodified component was withdrawn from production and/or sale, and if so, when:*
  - *On March 30, 2006, the inventory of the original unmodified component was depleted and the suffix was changed from A21 to A22 to indicate that the part had been superseded.*
- g) *When the modified component was made available as a service component:*
  - *January 11, 2005*
- h) *Whether the modified component can be interchanged with earlier production components:*
  - *The modified components are interchangeable with earlier production components.*

*Change 2: The front brake rotor size was increased for the MY2006 Accord Hybrid*

- a) *The date or approximate date on which the modification or change was incorporated into vehicle production:*
  - *This change was applied from the start of production of the MY2006 Accord Hybrid.*
- b) *A detailed description of the modification or change:*
  - *The front brake rotor size was increased from 282 mm to 300 mm. This required changes to the front brake caliper assemblies to match the increased rotor size.*
- c) *The reason(s) for the modification or change:*
  - *To increase braking performance to accommodate an increase in vehicle weight due to a minor model update occurring in the 2006 model year.*
- d) *The part number(s) (service and engineering) of the original component:*

*DISK*

  - *Engineering part number; 45251-SDC-A000*
  - *Service part number; 45251-SDC-A00*

*CALIPER ASSEMBLY R·L*

  - *Engineering part number; 45210-SDR-A010-M1 ·45230-SDR-A010-M1*
  - *Service part number; 45018-SDC-A01 ·45019-SDC-A01 ·45022-SDR-A00*
- e) *The part number(s) (service and engineering) of the modified component:*

*DISK*

  - *Engineering part number; 45251-SEA -J010*
  - *Service part number; 45251-SEA-J01*

*CALIPER ASSEMBLY R·L*

  - *Engineering part number; 45210-SDR -A110-M1 ·45230-SDR -A110-M1*
  - *Service part number ; 45018-SEA-J02 ·45019-SEA-J02 ·45022-SDR-A10*

- f) *Whether the original unmodified component was withdrawn from production and/or sale, and if so, when:*
  - *The change was applied from the start of production of the 2006 model year. Service parts for the original unmodified front brakes for the 2005 Accord Hybrid are still available at this time.*
- g) *When the modified component was made available as a service component:*
  - *Service parts for the larger front brakes were available at the start of retail sales for the 2006 Accord Hybrid.*
- h) *Whether the modified component can be interchanged with earlier production components:*
  - *The components affected by this design change are not interchangeable with earlier components for the previous model year Accord Hybrid.*

*Change 3: TCS was changed to VSA in MY2006 Accord Hybrid.*

- a) *The date or approximate date on which the modification or change was incorporated into vehicle production:*
  - *This change was applied from the start of production of the MY2006 Accord Hybrid.*
- b) *A detailed description of the modification or change:*
  - *The Traction Control System (TCS) was replaced by a Honda Vehicle Stability Assist (VSA) system with full Electronic Stability Control (ESC) functionality added to the previous TCS function.*
- c) *The reason(s) for the modification or change:*
  - *This change was applied to be consistent with the concept for the MY06 Accord to incorporate new safety features compared to the previous model.*
- d) *The part number(s) (service and engineering) of the original component:*
  - *Engineering part number; 57110-SDR-A220-M1*
  - *Service part number; 57110-SDR-A22*
- e) *The part number(s) (service and engineering) of the modified component:*
  - *Engineering part number; 57110-SDR-A330-M1*
  - *Service part number; 57110-SDR-A33*
- f) *Whether the original unmodified component was withdrawn from production and/or sale, and if so, when:*
  - *Production of both components continued, as the original unmodified component was still necessary as a service component for earlier production vehicles.*
- g) *When the modified component was made available as a service component:*
  - *The service component became available at the time of initial retail sales of the MY06 Accord Hybrid in the fall of 2005.*
- h) *Whether the modified component can be interchanged with earlier production components:*
  - *The components affected by this design change are not interchangeable with earlier components.*

*Change 4: The suction valve activation method of VSA modulator was changed in the MY2006 Accord Hybrid.*

- a) *The date or approximate date on which the modification or change was incorporated into vehicle production:*

- Drawing issuance date: October 20, 2006
- b) A detailed description of the modification or change:
  - An additional step of activating the suction valve was added after the initial diagnostics are completed following each time the vehicle's engine is started.
- c) The reason(s) for the modification or change:
  - This change was applied to address allegations of "soft brake" pedals due to the potential for intrusion of air during an initial self-diagnosis of the VSA modulator in a small percentage of potentially affected vehicles. At the time it was believed that the ultimate manifestation of this symptom would be a small change in brake pedal height with no effect on braking performance.
- d) The part number(s) (service and engineering) of the original component:
  - Engineering part number; 57110-SDR-A330-M1
  - Service part number; 57110-SDR-A33
- e) The part number(s) (service and engineering) of the modified component:
  - Engineering part number; 57110-SDR-A340-M1
  - Service part number; 57110-SDR-A34
- f) Whether the original unmodified component was withdrawn from production and/or sale, and if so, when:
  - On Oct. 11, 2007, the inventory of the original unmodified component was depleted and the suffix was changed from A33 to A34 to indicate that the part had been superseded.
- g) When the modified component was made available as a service component:
  - September 5, 2007
- h) Whether the modified component can be interchanged with earlier production components:
  - These components are interchangeable with earlier production components.

**Change 5: The diagnostics software of VSA modulator was changed in the MY2006 Accord Hybrid.**

- a) The date or approximate date on which the modification or change was incorporated into vehicle production:
  - Design drawing issued: June 29, 2007
- b) A detailed description of the modification or change:
  - This design change prevented the VSA modulator from conducting a solenoid valve diagnostic check when the service brake is applied by the driver.
- c) The reason(s) for the modification or change:
  - This design change was applied to prevent recognition errors during self-diagnosis of the solenoid within the VSA modulator.
- d) The part number(s) (service and engineering) of the original component:
  - Engineering part number; 57110-SDR-A340-M1
  - Service part number; 57110-SDR-A34
- e) The part number(s) (service and engineering) of the modified component:
  - Engineering part number; 57110-SDR-A350-M1
  - Service part number; 57110-SDR-A35
- f) Whether the original unmodified component was withdrawn from production and/or sale, and if so, when:
  - On November 14, 2007, the inventory of the original unmodified component was depleted and the suffix was changed from A34 to A35 to indicate that the part had

*been superseded. This change was applied after production of the MY2006 Accord Hybrid had been completed, and only affects replacement service parts.*

- g) When the modified component was made available as a service component:
  - September 5, 2007*
- h) Whether the modified component can be interchanged with earlier production components:
  - VSA modulators incorporating this design change are interchangeable with earlier production.*

*Change 6: The setting of ABS modulator was changed in MY2004 Civic Hybrid.*

- a) The date or approximate date on which the modification or change was incorporated into vehicle production:
  - This design change was implemented prior to the start of production of the MY2004 Civic Hybrid.*
- b) A detailed description of the modification or change:
  - This modification was made to better match the ABS algorithm settings to the characteristics and specifications of the Civic Hybrid.
  - The reservoir capacity was increased from 1.9 cc to 2.55cc. This also harmonized the Civic Hybrid ABS reservoir capacity to be the same as non-Hybrid Civic models.*
- c) The reason(s) for the modification or change:
  - To modify ABS setting matched to the vehicle characteristics and facilitate a single specification for Civic models.*
- d) The part number(s) (service and engineering) of the original component:
  - Engineering part number; 57110-S5B-0030
  - Service part number; 57110-S5B-003*
- e) The part number(s) (service and engineering) of the modified component:
  - Engineering part number; 57110-S5B-9511-M1
  - Service part number; 57110-S5B-951*
- f) Whether the original unmodified component was withdrawn from production and/or sale, and if so, when:
  - The original unmodified component remained available as a service replacement part until the on-hand inventory was depleted, at which point the modified component was provided as a service replacement part.*
- g) When the modified component was made available as a service component:
  - June 25, 2003*
- h) Whether the modified component can be interchanged with earlier production components:
  - The components affected by this design change are not intended to be interchanged with earlier components.*

*Change 7: Setting of Hydraulic Servo Assembly was changed in the MY2007 Civic Hybrid by changing the solenoid valve.*

- a) The date or approximate date on which the modification or change was incorporated into vehicle production:
  - This modification was applied from the beginning of mass production for the MY2007 Civic Hybrid on July 19, 2006.*

- b) A detailed description of the modification or change:
- The method of driving the solenoid valve was modified. Specifically, the solenoid valve drive current value mapping was modified and the set value for the solenoid valve to begin adjusting pressure within the hydraulic servo assembly was changed.
- c) The reason(s) for the modification or change:
- To reduce noise (that is noticeable by the driver or passengers) generated by fluctuation of the controlled hydraulic pressure during cooperative regenerative braking control. Fluctuation of hydraulic pressure is reduced (or controlled) by improving the pressure adjusting performance of the solenoid valve.
- d) The part number(s) (service and engineering) of the original component:
- Engineering part number; 46000-SNC-A030-M1
  - Service part number; 01469-SNC-A03
- e) The part number(s) (service and engineering) of the modified component:
- Engineering part number; 46000-SNC-A060-M1
  - Service part number; 01469-SNC-A06
- f) Whether the original unmodified component was withdrawn from production and/or sale, and if so, when:
- On May 4, 2006, the inventory of the original unmodified component was depleted and the suffix was changed from A03 to A06 to indicate that the part had been superseded.
- g) When the modified component was made available as a service component:
- May 7, 2009
- h) Whether the modified component can be interchanged with earlier production components:
- The modified components are interchangeable with earlier production components.

*Change 8: The settings of ABS modulator was changed in MY2007 Civic Hybrid.*

- a) The date or approximate date on which the modification or change was incorporated into vehicle production:
- This modification was applied from the beginning of mass production for the MY2007 Civic Hybrid on July 19, 2006.
- b) A detailed description of the modification or change:
- To modify the ABS settings to better match the vehicles specifications and characteristics.
  - The vehicle speed specification for initial ABS diagnostics was increased from 5 km/h to 30 km/h to help prevent driver detection of the ABS self-diagnosis, which requires activation of the modulator with the output valves closed, to prevent any affect on vehicle performance.
- c) The reason(s) for the modification or change:
- To modify the ABS settings to better match the vehicles specifications and characteristics.
  - To improve the marketability by reducing noticeable noise and vibration during self-diagnosis of the ABS modulator.
- d) The part number(s) (service and engineering) of the original component:
- Engineering part number; 57110-SNC-A020-M1
  - Service part number; 57110-SNC-A02
- e) The part number(s) (service and engineering) of the modified component:



- Engineering part number; 57110-SNC-A030-M1
- Service part number; 57110-SNC-A03
- f) Whether the original unmodified component was withdrawn from production and/or sale, and if so, when:
  - On September 13, 2007, the inventory of the original unmodified component was depleted and the suffix was changed from A02 to A03 to indicate that the part had been superseded.
- g) When the modified component was made available as a service component:
  - November 4, 2010
- h) Whether the modified component can be interchanged with earlier production components:
  - The subject components are interchangeable with earlier production components.

*Change 9: The coating of front brake rotors was changed in MY2007 Civic Hybrid*

- a) The date or approximate date on which the modification or change was incorporated into vehicle production:
  - July 19, 2006.
- b) A detailed description of the modification or change:
  - The surface coating for non-friction surface areas was changed from a clear coating to a black coating
- c) The reason(s) for the modification or change:
  - To improve the appearance of the front brake rotors.
- d) The part number(s) (service and engineering) of the original component:
  - Engineering part number; 57110-SNC-A020-M1
  - Service part number; 57110-SNC-A02
- e) The part number(s) (service and engineering) of the modified component:
  - Engineering part number; 57110-SNC-A030-M1
  - Service part number; 57110-SNC-A03
- f) Whether the original unmodified component was withdrawn from production and/or sale, and if so, when:
  - On September 13, 2007, the inventory of the original unmodified component was depleted and the suffix was changed from A02 to A03 to indicate that the part had been superseded.
- g) When the modified component was made available as a service component:
  - November 4, 2010
- h) Whether the modified component can be interchanged with earlier production components:
  - The components are interchangeable with earlier production components.

*Change 10: The setting of Hydraulic Servo Assembly was changed in MY2008 Civic Hybrid*

- a) The date or approximate date on which the modification or change was incorporated into vehicle production:
  - September 7, 2007
- b) A detailed description of the modification or change:
  - Brake switch failure diagnosis condition was changed
  - The shape of the back-up piston assembly component was modified.

- To modify hydraulic servo to better match the vehicle specifications and characteristics, the shape of the back-up piston assembly component was modified.
- c) The reason(s) for the modification or change:
  - To prevent the incorrect detection of diagnosis
  - To improve performance of the component
- d) The part number(s) (service and engineering) of the original component:
  - Engineering part number; 46000-SNC-A060-M1
  - Service part number; 01469-SNC-A06
- e) The part number(s) (service and engineering) of the modified component:
  - Engineering part number; 46000-SNC-A071-M1
  - Service part number; 01469-SNC-305
- f) Whether the original unmodified component was withdrawn from production and/or sale, and if so, when:
  - On May 7, 2009, the inventory of the original unmodified component was depleted and the suffix was changed from A62 to 305 to indicate that the part had been superseded.
- g) When the modified component was made available as a service component:
  - July 30, 2008
- h) Whether the modified component can be interchanged with earlier production components:
  - The modified component is interchangeable with earlier production components.

Change 11: The power unit component was changed in MY2008 Civic Hybrids.

- a) The date or approximate date on which the modification or change was incorporated into vehicle production:
  - September 7, 2007
- b) A detailed description of the modification or change:
  - ACC.(accumulator) TUBE was added to power unit
- c) The reason(s) for the modification or change:
  - To improve the merchantability Noise and vibration)
- d) The part number(s) (service and engineering) of the original component:
  - Engineering part number; 57300-SNC-A020-M1
  - Service part number; 57300-SNC-A02
- e) The part number(s) (service and engineering) of the modified component:
  - Engineering part number; 57300-SNC-A040-M1
  - Service part number; 57300-SNC-A04
- f) Whether the original unmodified component was withdrawn from production and/or sale, and if so, when:
  - On January 17, 2011, the inventory of the original unmodified component was depleted and the suffix was changed from A02 to A04 to indicate that the part had been superseded.
- g) When the modified component was made available as a service component:
  - June 6, 2008
- h) Whether the modified component can be interchanged with earlier production components:
  - The modified component is interchangeable with earlier production components.

*Change 12: The setting of Hydraulic Servo Assembly was changed in MY2009 Civic Hybrid.*

- a) *The date or approximate date on which the modification or change was incorporated into vehicle production:*
  - *May 14, 2008*
- b) *A detailed description of the modification or change:*
  - *To modify hydraulic servo assembly specifications to better match the vehicle's characteristics.*
  - *The damper-stroke characteristics were changed.*
- c) *The reason(s) for the modification or change:*
  - *To modify hydraulic servo assembly specifications to better match the vehicle's characteristics.*
  - *To improve the performance of the component*
- d) *The part number(s) (service and engineering) of the original component:*
  - *Engineering part number; 46000-SNC-A071-M1*
  - *Service part number; 01469-SNC-305*
- e) *The part number(s) (service and engineering) of the modified component:*
  - *Engineering part number; 46000-SNC-A081-M1*
  - *Service part number; 01469-SNC-306*
- f) *Whether the original unmodified component was withdrawn from production and/or sale, and if so, when:*
  - *On July 30, 2008, the inventory of the original unmodified component was depleted.*
- g) *When the modified component was made available as a service component:*
  - *June 6, 2008*
- h) *Whether the modified component can be interchanged with earlier production components:*
  - *The modified component is interchangeable with earlier production components.*

*Change 13: ABS was changed to incorporate Vehicle Stability Assist (VSA – equivalent to electronic stability control (ESC)) in the MY2009 Civic Hybrid.*

- a) *The date or approximate date on which the modification or change was incorporated into vehicle production:*
  - *May 14, 2008*
- b) *A detailed description of the modification or change:*
  - *ABS was changed to incorporate VSA*
- c) *The reason(s) for the modification or change:*
  - *This change was applied to be consistent with the concept for the MY09 Civic to incorporate new safety features compared to the previous model.*
- d) *The part number(s) (service and engineering) of the original component:*
  - *Engineering part number; 57110-SNC-A030-M1*
  - *Service part number; 57110-SNC-305*
- e) *The part number(s) (service and engineering) of the modified component:*
  - *Engineering part number; 57110-SNC-G120-M1*
  - *Service part number; 57110-SNC-315*
- f) *Whether the original unmodified component was withdrawn from production and/or sale, and if so, when:*

- Production of both components continued, as the original unmodified component was still necessary as a service component for earlier production vehicles.
- g) When the modified component was made available as a service component:
  - June 6, 2008
- h) Whether the modified component can be interchanged with earlier production components:
  - The modified components are not interchangeable with earlier production components.

**Change 14: The setting of Hydraulic Servo Assembly was changed in MY2010 Civic Hybrid**

- a) The date or approximate date on which the modification or change was incorporated into vehicle production:
  - June 25, 2009
- b) A detailed description of the modification or change:
  - To modify hydraulic servo assembly specifications to better match the vehicle's characteristics
  - Accumulator holding pressure during stopping was changed to 18 MPa from 14MPa
- c) The reason(s) for the modification or change:
  - To prevent the incorrect illumination of reserve tank fluid (liquid) warning lamp
- d) The part number(s) (service and engineering) of the original component:
  - Engineering part number; 46000-SNC-A081-M1
  - Service part number; 01469-SNC-306
- e) The part number(s) (service and engineering) of the modified component:
  - Engineering part number; 46000-SNC-A090-M1
  - Service part number; 01469-SNC-316
- f) Whether the original unmodified component was withdrawn from production and/or sale, and if so, when:
  - Production was discontinued
- g) When the modified component was made available as a service component:
  - July 6, 2009
- h) Whether the modified component can be interchanged with earlier production components:
  - The modified components are interchangeable with earlier production components.

**Change 15: In the Powertrain Control Module (PCM, or engine ECU), the control program for the amount of regenerative braking control when the accelerator pedal is not applied was changed in the MY06 Accord Hybrid.**

- a) The date or approximate date on which the modification or change was incorporated into vehicle production:
  - Drawing issued: March 8, 2006
- b) A detailed description of the modification or change:
  - The regenerative braking when the accelerator pedal has been released was reduced compared to earlier production. The amount of time between the pedal being released and the application of the fuel cut after accelerator pedal has been

released was reduced comparing to the initial regenerative control amount. For example, at a vehicle speed of 100km/h the amount of simulated engine braking effect provided by the regenerative braking system was reduced from 0.022G→0.013G.

- c) The reason(s) for the modification or change:
  - To improve fuel economy by reducing fuel consumption in this condition.
- d) The part number(s) (service and engineering) of the original component:
  - Engineering part number; 37820-RCJ-A650-M1
  - Service part number; 37820-RCJ-A65
- e) The part number(s) (service and engineering) of the modified component:
  - Engineering part number; 37820-RCJ-A660-M1
  - Service part number; 37820-RCJ-A66
- f) Whether the original unmodified component was withdrawn from production and/or sale, and if so, when:
  - On December 22, 2006, the inventory of the original unmodified component was depleted and the suffix was changed from A65 to A66 to indicate that the part had been superseded.
- g) When the modified component was made available as a service component:
  - July 10, 2006
- h) Whether the modified component can be interchanged with earlier production components:
  - The modified components are interchangeable with earlier production components.

10. Provide a graphic and written description of the primary components of the IMA braking system in the subject vehicles and the peer vehicles.

Response:

See Attachment #Q10 brake structure

11. Describe in detail the functionality of the Honda's Integrated Motor Assist (IMA) Hybrid System with regards to braking (regenerative and hydraulic).

Response:

See Attachment #Q11 Q12 functional detailed explanation

12. With regard to request #11 describe in detail the following:
- a. All similarities and differences between the braking systems in the subject vehicle and the peer vehicles;
  - b. The strategy Honda uses to incorporate regenerative braking and hydraulic braking at all speed ranges (i.e. low speed through high speed) during normal braking (non wheel slip);
  - c. The strategy Honda uses to incorporate regenerative braking and hydraulic braking at all speed ranges (i.e. low speed through high speed) during an ABS stop (wheel slip); and
  - d. The effect of battery charge (through the complete range of charge) on the hybrid braking system for normal braking and ABS braking.

Response:

See Attachment #Q11 Q12 functional detailed explanation

13. Provide Honda's assessment of VOQs (10349891, 10348634, 10227129, 10244168, 10252727, 10259664, 10207034, 10304504, and 10310605) that alleged consumers experience the vehicle accelerating while or just after braking.

Response:

*Honda's assessment of the specified VOQs is provided below.*

VOQ No.	MODEL	MY	VIN	Assessment
10349891	CIVIC	2007	JHMFA36237S [REDACTED]	We are unable to conduct analysis for this contention since there are no claimed symptoms in CRMS, WARRANTY or TECHLINE information within Honda
10348634	CIVIC	2009	JHMFA36299S [REDACTED]	We are unable to conduct the analysis for this contention since there are no claimed symptoms in CRMS, WARRANTY or TECHLINE information within Honda
10227129	CIVIC	2007	JHMFA36217S [REDACTED]	A Honda CRMS (Consumer Relations Management System) contact filed on 2008/5/9 matched the claimed contents of this VOQ. In CRMS, it was advised that the user should go to a dealer, but there was no record of the inspection being done and no warranty information. Therefore, we are unable to conduct analysis of the claimed contention.
10244168	CIVIC	2007	JHMFA36287S [REDACTED]	For the complaint of IMA battery deterioration, after the complaint was filed, 10-034 (battery premature deterioration) was conducted on Sept 14, 2010. For other described contents, there were no claimed symptoms in CRMS, WARRANTY or TECHLINE information within Honda. We are unable to conduct the analysis without suspect components from the vehicle.
10252727	CIVIC	2008		We do not have enough information about the contention or the vehicle involved to make any conclusions about this claim.

10259664	CIVIC	2006	JHMES96603S [REDACTED]	CRMS information filed on 2009/2/23 matched the VOQ. ·We were unable to reproduce the claimed symptom on the vehicle.
10207034	ACCORD	2006	JHMCN36596C [REDACTED]	CRMS information filed on 2007/9/6 matched the claimed contents. ·We were unable to reproduce the claimed symptom on the vehicle.
10304504	CIVIC	2005		We do not have enough information about the contention or the vehicle involved to make any conclusions about this claim.
10310605	CIVIC	2008	JHMFA36288S [REDACTED]	·We were unable to conduct analysis since there are no claimed symptoms in CRMS, WARRANTY or TECHLINE information within Honda.

14. Furnish Honda'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:

*Honda's assessment of the defect alleged for the subject vehicle is provided below.*

VOQ No.	MODEL	MY	VIN	Assessment
10308224	ACCORD	2005	JHMCN364X5C [REDACTED]	·We are unable to conduct analysis since there are no claimed symptoms in CRMS, WARRANTY or TECHLINE information within Honda ·It was assumed that the repair suggested by the dealer could be SB07□045 (January 14, 2009), however, the details are unknown to us.

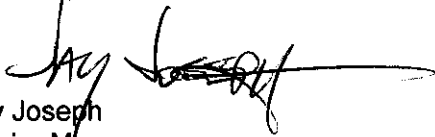
10329383	ACCORD	2005	JHMCN364250 [REDACTED]	<p>The information filed in CRMS on 2/15/2006 was an inquiry about the recall, and we are unable to conduct the analysis since there are no claimed symptoms in CRMS, WARRANTY or TECHLINE information within Honda.</p>
10353502	ACCORD	2005	JHMCN364950 [REDACTED]	<p>The claimed contents matched CRMS, WARRANTY and TECHLINE information within Honda. It was alleged that the pedal force of the brake pedal to get the same deceleration rate had changed.</p> <p>We concluded the following:</p> <ul style="list-style-type: none"> <li>a. Caused by the change of intake manifold occurrence negative pressure</li> <li>b. Assist force and assist limit pedal force of brake booster (Master Power) fluctuates depending on intake manifold occurrence of negative pressure (vacuum) during braking. The intake manifold negative pressure tends to be low in the process of warming up compared to after the vehicle's engine has warmed up.</li> <li>c. Sometimes, heavier brake pedal activation force is required while the vehicle's engine is still in the process of warming up compared to an engine that has warmed up, if the driver tries to get relatively-high deceleration during that period.</li> <li>d. We confirmed that this vehicle did comply with our in-house standard that specifies sufficient braking force, and we concluded that there is no safety issue.</li> </ul>
10179057	ACCORD	2006	JHMCN364550 [REDACTED]	<p>-We are unable to conduct analysis since there are no claimed symptoms in CRMS, WARRANTY or TECHLINE information within Honda.</p>



Mr. Jeffrey Quandt  
NVS-213dlr / DP10-004  
January 21, 2011  
Page 25

Sincerely,

AMERICAN HONDA MOTOR CO., INC.

A handwritten signature in black ink, appearing to read "Jay Joseph", with a long horizontal flourish extending to the right.

Jay Joseph  
Senior Manager  
Product Regulatory Office

JWJ:nis

Attachments

January 24, 2011

Office of the Chief Counsel  
NATIONAL HIGHWAY TRAFFIC SAFETY  
ADMINISTRATION  
1200 New Jersey Ave., SE  
Washington, DC 20590

**Re: NVS-213dlr / DP10-004**

Dear Chief Counsel:

Enclosed herewith is a Request for Confidentiality for your consideration for material related to the matter referenced above. We are requesting that you indefinitely do not release for public record certain Honda business confidential data.


The pages listed below are being submitted under a Request for Confidentiality as this information is considered confidential and proprietary and Honda does not customarily release this type of information to the public. More specifically, the items Q11\_12 contain and are based on proprietary Honda in-house tests that were developed with a great investment of time and effort. We feel that release of this content to our competitors would place us at a competitive disadvantage, and accordingly, ask that it not be released.

Attachment	Pages Requesting Confidentiality	Reason for Confidentiality
Q8 Doc 1 QIS Report (English and Japanese)	Page 1	Customer VINs – Proprietary Data
Q8 Doc 2 QIS Report (English and Japanese)	Page 1	Customer VINs – Proprietary Data
Q8 Doc 3 QIS Report (English and Japanese)	Page 1	Customer VINs – Proprietary Data
Q8 Doc 4 QIS Report (English and Japanese)	Page 1	Customer VINs – Proprietary Data
Q11_12	Page 4	Braking force specification – Proprietary Data
Q11_12	Page 5, 6, 8	Regenerative and Hydraulic Braking test analysis and Braking force specification – Proprietary Data
Q11_12	Page 7, 9	Regenerative and Hydraulic Braking test analysis – Proprietary Data
Q11_12	Page 10	ABS activation test analysis – Proprietary Data
Q11_12	Page 11-12	Hybrid braking system test analysis – Proprietary Data

Please advise me of your decision on this matter at your earliest convenience.

Very truly yours,

AMERICAN HONDA MOTOR CO., INC.

  
Jay Joseph  
Senior Manager  
Product Regulatory Office

JWJ:nis

Enclosure