

*Rec'd 11/10/10
Jony*

HONDA
del
American Honda Motor Co., Inc.
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Torrance, CA 90501-2746
Phone (310) 783-2000
John A.

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

November 9, 2010

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

Re: **PE10-037**
2007-08 Honda Fit
Low beam headlight failure

Dear Mr. Yon:

In reply to your letter dated September 22, 2010, we are submitting our response regarding the allegations of low beam headlight failure in model year (MY) 2007 through 2008 Honda Fit vehicles.

1. State the number of subject vehicles Honda has manufactured for sale in the United States. Separately, for each vehicle manufactured to date by Honda, state the following:
 - a) Vehicle identification number (VIN);
 - b) Model Year;
 - c) Date of manufacture;
 - d) Date warranty coverage commenced; and
 - e) The State in the United States where the vehicle was originally sold or leased (or delivered for sale or lease).

For subparts "a" through "e," provide a table in Microsoft Access 2000, or a compatible format, entitled "PRODUCTION DATA."

Response:

The data elements "a" through "e" are provided in the file titled "PRODUCTION DATA" on the enclosed CD.

Model	Model Year	Sales
Fit	2007	68,525
	2008	74,451

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:
 - a) Consumer complaints;
 - b) Field reports, including dealer field reports;
 - c) Reports involving a fire, 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 the alleged defect in a subject vehicle, property damage claims, consumer complaints, or field reports;

- d) Third-party arbitration proceedings where Honda is or was a party to the arbitration; and,
- e) Lawsuits, both pending and closed, in which Honda is or was a defendant or codefendant.

For subparts "a" through "e" state the total number of each item (e.g., consumer complaints, reports from retailers, etc.) separately. Multiple incidents involving the same vehicles 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" 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 "d" and "e" 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 "e" are stated in the table below. Honda did not identify any relevant reports for items "c" through "e".

Note: Honda does not have any fleets.

Model	Model Year	A Consumer Complaints	B Field/ Dealer Reports	C Fire, Crash, Injury, Fatality Reports	D Third-Party Arbitration	E Lawsuits
Fit	2007	27	64	0	0	0
	2008	1	1	0	0	0

Source(s): Customer Relations, Tech Line, Field Reports, Claims and Lawsuits.
As of: October 1, 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, report from retailer, etc.);
 - c) Vehicle owner's name, address, and telephone number;
 - d) Vehicle identification number (VIN);
 - e) Model year;
 - f) Vehicle date of manufacture;
 - g) Incident date;
 - h) Report or claim date;
 - i) Whether a fire is alleged;
 - j) Number of alleged injuries; and
 - k) Number of alleged fatalities.

Provide this information in Microsoft Access 2000, or a compatible format, entitled "REQUEST NUMBER TWO DATA."

Response:

The data elements "a" through "k" 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: October 1, 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, reports from retailers, 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 the last six digits of the VIN.

Source(s): Customer Relations, Tech Line, Field Reports, Claims and Lawsuits.
As of: October 1, 2010

5. State 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: warranty claims; extended warranty claims; claims for goodwill services that were provided; 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 name and telephone number;
- c) Vehicle identification number (VIN);
- d) Model Year;
- e) Vehicle date of manufacture;
- f) Repair date;
- g) Repairing facility's name, telephone number, city and state or ZIP code;
- h) Labor operation number;
- i) Problem code;
- j) Replacement part number(s) and description(s);
- k) Concern stated by customer;
- l) Comment, if any, by the technician or person(s) making the repair, and/or the person(s) processing the claim that relate to the claim and/or repair.

Provide this information in Microsoft Access 2000, or a compatible format, entitled "WARRANTY DATA."

Response:

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

Model	Model Year	Warranty Claims	Goodwill Claims	Extended Warranty	Vehicle Service Contract
Fit	2007	35	11	0	13
	2008	0	0	0	0

Source(s): Warranty claim data.
As of: October 15, 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 the terms of the new vehicle warranty coverage offered by Honda on the subject vehicles (i.e., the number of months for which coverage is provided and the vehicle systems that are covered). Describe any extended warranty coverage option(s) related to the alleged defect 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 vehicles, claims were pulled based on the following part numbers: Lighting and Turn Switch Assembly, Engine Room Harness, Instrument Harness, Relay Assembly Power, Combination Switch Assembly and Relay Box Assembly. The contention text description was reviewed for each claim to identify the any low beam headlight failure.

Coding and Descriptions: See Attachment #Q6

Warranty Coverage: All subject 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. Honda has not issued extended warranty coverage related to the alleged defect for any of the subject vehicles.

Source(s): Warranty claim data.
As of: October 15, 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 retailers or distributors, regional or zone offices, field offices, 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:

Honda has not issued any service information related to low beam headlight failure. 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 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:
- Action title or identifier;
 - The actual or planned start date;
 - The actual or expected end date;
 - Brief summary of the subject and objective of the action;
 - Engineering group(s)/supplier(s) responsible for designing and for conducting the action; and
 - 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 three documents included in Attachment #Q8. We are submitting under separate cover to the Chief Counsel's Office a Request for Confidentiality for some information contained in the Attachment #Q8 documents.

Document 1: Quality Improvement Sheet (QIS)

- Action title or identifier: QIS (MV2008041834750)*
- The actual or planned start date: April 18, 2008*
- The actual or expected end date: July 31, 2008*
- Brief description or summary of the subject and objective of the action: Analysis of the cause of the failure using the actual part (lighting & turn signal switch) that failed in the market.*
- Engineering group(s)/supplier(s) responsible for designing and conducting the action: The quality analysis was based on internal design requirements within the Honda Automobile Quality Analysis Office and Toyo Denso, the supplier of the subject component.*
- A brief summary of the findings and/or conclusions resulting from the action: The wiring harness connector joint that connects the lighting and turn signal switch to the instrument panel wiring harness was properly assembled. However, there appears to have been a reduction in pressure within the male/female contact point of the connector due to some unknown cause that may have increased electrical resistance, resulting in heat or arcing. The cause of reduced contact pressure within the electrical terminal has not been identified at this time.*

Document 2: Quality Improvement Sheet (QIS)

- Action title or identifier: QIS (MV20081201091352)*
- The actual or planned start date: December 1, 2008*
- The actual or expected end date: March 9, 2009*

- d) *Brief summary of the subject and objective of the action: Analysis of the cause of the failure using actual failed parts (lighting and turn signal switch) returned from a vehicle in the market.*
- e) *Engineering group(s)/supplier(s) responsible for designing and for conducting the action: The quality analysis was based on internal design requirements within Honda Automobile Quality Analysis Office and Toyo Denso, the supplier of the component.*
- f) *A brief summary of the findings and/or conclusions resulting from the action: Analysis confirmed that the failure does not occur if the terminal contact pressure within the wiring harness connector is within the design specification. It is expected that the terminal contact pressure was reduced by some undetermined cause. The root cause of reduced terminal contact pressure was investigated, and production specifications were confirmed, however we were unable to reach any conclusion regarding the cause of this condition.*

Document 3: Quality Improvement Sheet (QIS)

- a) *Action title or identifier: QIS (MV20090617153846)*
 - b) *The actual or planned start date: June 17, 2009*
 - c) *The actual or expected end date: June 29, 2009*
 - d) *Brief summary of the subject and objective of the action: Analysis of the cause of the failure using actual failed parts (lighting and turn signal switch) returned from a vehicle in the market.*
 - e) *Engineering group(s)/supplier(s) responsible for designing and for conducting the action: The quality analysis was based on internal design requirements within Honda Automobile Quality Analysis Office and Toyo Denso, the supplier of the component.*
 - f) *A brief summary of the findings and/or conclusions resulting from the action: Analysis confirmed that the failure does not occur if the terminal contact pressure of the wiring harness connector between the lighting and turn signal switch and the main instrument panel wiring harness is within design tolerances. It is believed that the terminal contact pressure within the wiring harness connector was reduced by some undetermined cause. An investigation of manufacturing specifications was conducted, but did not yield identification of a root cause.*
- 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. 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 design or manufacturing changes were applied to the low beam left and right side headlamps during the 2007 and 2008 model years of Honda Fit produced for distribution in the U.S. market to address concerns over the loss of headlight function. Please note that the design for the United States was different than the design for Canada in this time period. Also, a new design of the Honda Fit was introduced in the 2009 model year, including a new headlight system with various changes to the wiring harness.

10. State the number of each of the following that Honda has sold that may be used in 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*):
- Subject component(s); and
 - Any kits that have been released, or developed, by Honda for use in service repairs to the subject component(s)/assemblies.

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(s), whether installed in production or in service, and state the applicable dates of production or service usage.

Response:

- *See Attachment #Q10 for parts demand.*
- *Supplier's name, address and appropriate point of contact will be provided shortly.*

11. Furnish Honda's assessment of the alleged defect in the subject vehicles, including:
- The causal or contributory factor(s);
 - The failure mechanism(s);
 - The failure mode(s);
 - The risk to motor vehicle safety that it poses;
 - What warnings, if any, that the alleged defect was occurring or that the subject component was malfunctioning; and
 - The reports included with this inquiry.

Response:

- a. *The causal or contributory factor(s)*

The terminal contact pressure of the wiring harness connector of the lighting & turn signal switch and the instrument panel wiring harness was reduced, resulting in an increase of electrical resistance which generated heat, causing the circuit to open.

- b. *The failure mechanism(s)*

Honda has confirmed that the failure will not occur if the terminal contact pressure of the wiring harness connector for the lighting & turn signal switch to the instrument panel wiring harness is within design specifications. It is understood that the terminal contact pressure within the wiring harness connector in the units that have failed was reduced due to an undetermined cause.

Honda is continuing to investigate the cause of the wear on the tin (Sn) plating on the terminal surface due to vibration occurring in the area of the wiring harness connector during operation of the lighting and turn signal switch and an increase of electrical resistance in the contact area. We are also continuing to investigate the effects of

differences in the width of the terminal sliding area, even those within the design specifications, by continuing extended durability testing on these components.

Honda will conduct further investigation and analysis of these failures to determine the casue, however we are now considering whether a service campaign may be necessary as sporadic occurrences continue to be reported in the market.

c. The failure modes(s):

The low beam headlights on both the left and right side do not illuminate when the headlight switch is in the ON position.

d. The risk to motor vehicle safety that it poses:

The low beam headlights do not illuminate, causing the driver to rely on the high beam headlights or ambient lighting to drive.

e. What warnings, if any, that the alleged defect was occurring or that the subject component was malfunctioning:

There are no warnings to the drive that this condition may occur, however the existence of the condition should be observed as a result of the lack of forward lighting when the headlight control switch is in the ON position and the high beam headlights have not been selected.

f. The reports included with this inquiry

NHTSA VOQ Ref.No	VIN	Assessment
10352240	JHMGD386X7S [REDACTED]	Based on the limited information provided in the VOQ we cannot rule out the possibility that the reported failure is due to the same cause as the one we are continuing to investigate. This customer did contact American Honda to file a complaint, however, without the ability to inspect the actual failed parts we cannot confirm that it is due to the same cause.
10346636	JHMGD386X8S [REDACTED]	Based on the limited information provided in the VOQ we cannot rule out the possibility that the reported failure is due to the same cause as the one we are continuing to investigate. However, without the ability to inspect the actual failed parts we cannot confirm that it is due to the same cause.
10345291	JHMGD38407S [REDACTED]	Based on the limited information provided in the VOQ we cannot rule out the possibility that the reported failure is due to the same cause as the one we are continuing to investigate. This customer did contact American Honda to file a complaint, however, without the ability to inspect the actual failed parts we cannot confirm that it is due to the same cause.
10344726	JHMGD38617S [REDACTED]	Based on the limited information provided in the VOQ we cannot rule out the possibility that the reported failure is due to the same cause as the

		one we are continuing to investigate. This customer did contact American Honda to file a complaint, however, without the ability to inspect the actual failed parts we cannot confirm that it is due to the same cause.
10343677	JHMGD38697S [REDACTED]	Based on the limited information provided in the VOQ we cannot rule out the possibility that the reported failure is due to the same cause as the one we are continuing to investigate. This customer did contact American Honda to file a complaint, however, without the ability to inspect the actual failed parts we cannot confirm that it is due to the same cause.
10340665	JHMGD37407S [REDACTED]	Based on the limited information provided in the VOQ we cannot rule out the possibility that the reported failure is due to the same cause as the one we are continuing to investigate. This owner did contact American Honda to file a complaint, however, without the ability to inspect the actual failed parts we cannot confirm that it is due to the same cause.
10336692	JHMGD38617S [REDACTED]	Based on the limited information provided in the VOQ we cannot rule out the possibility that the reported failure is due to the same cause as the one we are continuing to investigate. However, without the ability to inspect the actual failed parts we cannot confirm that it is due to the same cause.
10332311	JHMGD38687S [REDACTED]	Based on the limited information provided in the VOQ we cannot rule out the possibility that the reported failure is due to the same cause as the one we are continuing to investigate. However, without the ability to inspect the actual failed parts we cannot confirm that it is due to the same cause.

Sincerely,

AMERICAN HONDA MOTOR CO., INC.



Jay Joseph
Senior Manager
Product Regulatory Office

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Attachments