

OFFICE OF DEFECTS &  
INVESTIGATIONS

2011 FEB 23 P 5:02



February 18, 2011

**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 (PE10-046)**  
**Automatic Transmission Shift Cable Detachment; 2007 MY Kia Optima**

Dear Mr. Yon:

On behalf of Kia Motors Corp. ("KMC") and Kia Motors America, Inc., ("KMA"), Hyundai - Kia America Technical Center, Inc. ("HATCI") submits Kia's supplemental response to Request Number 8 of your letter dated December 7, 2010 (Reference NVS-212mjl/PE10-046) pursuant to the extension you granted on January 25, 2011. HATCI does not manufacture any vehicles and in particular did not manufacture any Kia Optima. It has only been designated by KMC and KMA to act as their communication liaison with the National Highway Traffic Safety Administration. This letter is submitted to NHTSA by HATCI in that limited role. As with all matters, Kia assembles all information for NHTSA and HATCI transmits that information to NHTSA.

**REQUEST NO. 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, Hyundai-Kia. This includes but is not limited to any and all actions by the subject component manufacturer relating to the alleged defect. 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.

Hyundai-Kia America Technical Center Inc.  
6800 Geddes Road, Superior Township, MI 48198  
TEL: 734-337-9499 FAX: 734-483-5919  
[www.hatci.com](http://www.hatci.com)

HATCI is an authorized representative of both Hyundai Motor Company and Kia Motors Corporation; which are separate and distinct automotive manufacturers.

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

Scott Yon, Chief

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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. If an action is not complete, provide a detailed schedule for the work to be done, tentative findings and/or conclusions, and provide an update within 10 days of completion of the action.

**RESPONSE TO REQUEST NO. 8:**

There is no Hyundai-Kia organization which conducted any of the actions which this request refers to.

The table below summarizes the actions conducted by Kia.

Action Title	Start Date	End Date	Subject/Object of Action	Group Responsible	Finding/Conclusion Summary
KMA Product Quality Technical Report, Gear Selector Cable Detachment	Vehicle repair date 5/16/07 (prior disconnection 8/30/06)	Report prepared by KMA to send to KMC 6/5/07	KMA identification of vehicle inability to shift out of reverse	KMA Product Quality Department	The shift cable was disconnected at the gear selector. Request support from KMC for possible cause(s). <b>See Response dated 1/27/11, Tab 4.</b>
Report on MG Automatic Transmission Shift Cable Detachment	Evaluation commenced upon receipt of report from KMA	Report completed 6/29/07	Investigate possible cause(s) for shift cable detachment	KMC Quality Assurance Team 1	Six incidents of incorrectly installed shift cables had been identified. Improved assembly operation 3/8/07; clips added 6/14/07 to prevent misassembly. <b>See Response dated 1/27/11, Tab 5.</b>
KMA Product Quality Technical Report, Automatic Shifter Assembly Inoperative	Vehicle repair date 5/29/09	Report prepared by KMA 7/23/09	Gear selector could not be shifted on subject vehicle. KMA evaluation and follow up on additional older vehicles	KMA Product Quality Department	Multiple issues identified: <ul style="list-style-type: none"><li>• Short circuit on shifter interlock solenoid</li><li>• Improper routing of shift cable causing excessive tension on retaining pin. Claim chart consistent with effective 3/07 and 6/07 improvements. Request support from KMC. <b>See Tab 1.</b></li></ul>

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

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Kia has been evaluating the issues addressed in the IR, including going back over the previously developed information referred to in these Actions and its prior conclusions regarding this issue. This review is taking into account the diversity of the customer contacts, other field data and variations in that data, as part of its upcoming response to Request No. 12. In accordance with the provisions of Request No. 8, it will supplement its responses to Request No. 8 within 10 days of completion of any further Action.

Sincerely,



Robert Babcock

Senior Manager, Regulation and Certification Department



**VIA FEDERAL EXPRESS**

February 18, 2011

O. Kevin Vincent  
Office of Chief Counsel (NCC-111)  
National Highway Traffic Safety Administration  
Room W41-227  
1200 New Jersey Avenue, S.E.  
Washington, D.C. 20590

Re: Request for Confidential Treatment of Information Submitted in Response to (PE10-046) (2007 Kia Optima; Automatic Transmission Shift Cable)

Dear Mr. Vincent:

On behalf of Kia Motors Corp. and Kia Motors America, Inc. (hereinafter collectively referred to as "Kia"), Hyundai-Kia America Technical Center, Inc. (HATCI) hereby requests that certain information submitted in its Supplemental Response dated February 18, 2011 to PE10-046 be treated as confidential. Please note that two (2) confidential copies are being submitted as Kia is seeking confidential treatment of the documents in their entirety. In accordance with 49 C.F.R. 512.3 (c), confidential business information includes trade secrets or commercial or financial information that is privileged or confidential as described in the Freedom of Information Act. See 5 U.S.C. 522(b)(4). Commercial information is considered confidential if it has not been publicly disclosed and if its release is likely to cause substantial harm to Kia's competitive position. 49 C.F.R. 512.3.

In its Response, Kia submitted the following documents for which it claims is confidential business information.

- Product Quality Technical Report, Automatic Shifter Assembly Inoperative dated July 23, 2009 prepared by KMA's Product Quality Department. (Tab 1 to Kia's Response).

These documents were prepared by Kia and contain confidential information, that, if made public, would cause substantial harm to Kia's competitive position in the market.

If you have any questions or concerns regarding this matter, or if you need any further clarification or support for this request, please do not hesitate to contact me.

Sincerely,

Robert Babcock  
Senior Manager,  
Regulation and Certification  
Department

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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.

**CERTIFICATE IN SUPPORT OF REQUEST FOR CONFIDENTIALITY**

I, Robert Babcock, pursuant to the provisions of 49 CFR part 512, state as follows:

(1) I am Robert Babcock, Senior Manager, Regulation and Certification Department and I am authorized by Kia Motors America, Inc., to execute this certificate on its behalf;

(2) I certify that the information contained in Tab 1 attached to Kia's response to Request No. 8 its Supplemental Response to PE10-046 dated February 18, 2011 is confidential and proprietary data and is being submitted with the claim that it is entitled to confidential treatment under 5 U.S.C. 552(b)(4) (as incorporated by reference in and modified by statute under which the information is being submitted);

(3) I hereby request that the information contained in Tab 1 attached to Kia's response to Request No. 8 of PE10-046 be protected indefinitely;

(4) This certification is based on the information provided by the responsible Kia Motors America, Inc. personnel who have authority in the normal course of business to release the information for which a claim of confidentiality has been made to ascertain whether such information has ever been released outside Kia Motors America, Inc.

(5) Based upon that information, to the best of my knowledge, information and belief, the information for which Kia Motors America, Inc., has claimed confidential treatment has never been released or become available outside Kia Motors America, Inc. (except as hereinafter specified);

(6) I make no representations beyond those contained in this certificate and, in particular, I make no representations as to whether this information may become available outside Kia Motors America, Inc. because of unauthorized or inadvertent disclosure (except as stated in paragraph 5); and

(7) I certify under penalty of perjury that the foregoing is true and correct.

Executed on this 18 th day of February, 2011.

**KIA MOTORS AMERICA, INC.**

By: Robert Babcock

Robert Babcock  
Senior Manager, Regulation and  
Certification Department

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**CONFIDENTIAL BUSINESS INFORMATION**