



U.S. Department  
of Transportation  
**National Highway  
Traffic Safety  
Administration**

1200 New Jersey Avenue SE.  
Washington, DC 20590

MAR - 9 2012

**CERTIFIED MAIL**  
**RETURN RECEIPT REQUESTED**

Jay Joseph, Senior Manager  
Product Regulatory Office  
American Honda Motor Company  
1919 Torrance Blvd. - Mailstop 500-2C-10A  
Torrance, CA 90501

NVS-212jfa  
EA11-004

Dear Mr. Joseph:

As you are aware, the Office of Defects Investigation (ODI) has completed Preliminary Evaluation (PE10-047) and has upgraded this investigation to an Engineering Analysis (EA). The EA was opened on April 11, 2011 based on our analysis of the information received from Honda in PE10-047. The assigned identification number is EA11-004. The purpose of this investigation is to investigate allegations of fire in the driver's door emanating from the driver's door power window master switch (PWMS) in model year (MY) 2006 Honda CR-V vehicles manufactured by American Honda Motor Company, Inc. (Honda). As part of the EA investigation this letter requests updated and additional information from Honda.

On September 6, 2011, Honda submitted a "Defect and noncompliance information report" (Part 573 or defect report) to notify the agency of its decision to conduct a safety recall on certain MY 2006 Honda CR-V vehicles manufactured at the Sayama factory in Japan. These vehicles were produced with a PWMS supplied by the Thai Toyo Denso Company, Ltd. In its Part 573 Report, Honda stated: *"other 2006 model year CR-V vehicles produced at other factories are excluded from this recall because they are equipped with a different master power window switch design from a different supplier and have not exhibited the same phenomenon to date."*

Since Honda's submission of the defect report, this office has received three Vehicle Owner Questionnaire (VOQ) reports that allege electrical failure of the PWMS on MY 2006 CR-V vehicles manufactured in the United Kingdom (UK) and sold in the United States. Honda has advised ODI that MY 2006 CR-V vehicles manufactured in the UK are produced with a PWMS supplied by "Omron."

- VOQ report number 10425406 states the presence of a burning odor and "sparks" were noted coming from the switch.
- VOQ report number 10439880 states the vehicle had been parked and off for about one hour when the "driver's door caught on fire." The fire was extinguished by the fire

department and the fire damage was limited to the driver's door in the area of the PWMS and the outer edge of the driver's seat cushion.<sup>1</sup>

- Finally, VOQ report number 10437807 states that the driver's window would not operate by the PWMS and the switch was replaced.

A copy of each of the three VOQ reports noted above have been sent to your office electronically for your information.

ODI notes that these three VOQ reports are in addition to the nine reports on UK manufactured vehicles that Honda provided in its response to PE 10-047 which includes Case ID: N012011-0700101066.

Unless otherwise stated in the text, the following definitions apply to these information requests:

- **Subject vehicles:** All MY 2006 Honda CR-V vehicles manufactured in the United Kingdom and produced for sale or lease in the United States that are equipped with an Omron power window master switch.
- **Subject components:** The electrical components of the power window system, including all related switches, relays, control modules, associated wiring, wiring harnesses, connectors, and other such system components.
- **Honda:** American Honda Motor Company, Inc., and its parent, Honda Motor Company, Ltd., all of its past and present officers and employees, whether assigned to their principal offices or any of their field or other locations, including all of their divisions, subsidiaries (whether or not incorporated) and affiliated enterprises and all of their headquarters, regional, zone and other offices and their employees, and all agents, contractors, consultants, attorneys and law firms and other persons engaged directly or indirectly (e.g., employee of a consultant) by or under the control of Honda (including all business units and persons previously referred to), who are or, in or after 1999, were involved in any way with any of the following related to the alleged defect in the subject vehicles:
  - a. Design, engineering, analysis, modification or production (e.g. quality control);
  - b. Testing, assessment or evaluation;
  - c. Consideration, or recognition of potential or actual defects, reporting, record-keeping and information management, (e.g., complaints, field reports, warranty information, part sales), analysis, claims, or lawsuits; or
  - d. Communication to, from or intended for zone representatives, fleets, dealers, or other field locations, including but not limited to people who have the capacity to obtain information from dealers.

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<sup>1</sup> We note this fire is very similar to the fire reported in Honda's Case ID: N012011-0700101066 on another UK manufactured vehicle. Honda's report states the vehicle was parked and off for approximately 12 hours. When the owner went out to the vehicle, smoke and flames were noted coming from the driver's door. This fire was also extinguished by the fire department and the damage to the vehicle was limited to the driver's door, the outer edge of the driver's seat cushion, and the trim around the driver's door.

- **Alleged defect:** Any failure, or other such abnormal condition, of the subject components that result in, or could result in, overheating, melting, fire, or other such thermal events.
- **Document:** “Document(s)” is used in the broadest sense of the word and shall mean all original written, printed, typed, recorded, or graphic matter whatsoever, however produced or reproduced, of every kind, nature, and description, and all non-identical copies of both sides thereof, including, but not limited to, papers, letters, memoranda, correspondence, communications, electronic mail (e-mail) messages (existing in hard copy and/or in electronic storage), faxes, mailgrams, telegrams, cables, telex messages, notes, annotations, working papers, drafts, minutes, records, audio and video recordings, data, databases, other information bases, summaries, charts, tables, graphics, other visual displays, photographs, statements, interviews, opinions, reports, newspaper articles, studies, analyses, evaluations, interpretations, contracts, agreements, jottings, agendas, bulletins, notices, announcements, instructions, blueprints, drawings, as-builts, changes, manuals, publications, work schedules, journals, statistical data, desk, portable and computer calendars, appointment books, diaries, travel reports, lists, tabulations, computer printouts, data processing program libraries, data processing inputs and outputs, microfilms, microfiches, statements for services, resolutions, financial statements, governmental records, business records, personnel records, work orders, pleadings, discovery in any form, affidavits, motions, responses to discovery, all transcripts, administrative filings and all mechanical, magnetic, photographic and electronic records or recordings of any kind, including any storage media associated with computers, including, but not limited to, information on hard drives, floppy disks, backup tapes, and zip drives, electronic communications, including but not limited to, the Internet and shall include any drafts or revisions pertaining to any of the foregoing, all other things similar to any of the foregoing, however denominated by Honda, any other data compilations from which information can be obtained, translated if necessary, into a usable form and any other documents. For purposes of this request, any document which contains any note, comment, addition, deletion, insertion, annotation, or otherwise comprises a non-identical copy of another document shall be treated as a separate document subject to production. In all cases where original and any non-identical copies are not available, “document(s)” also means any identical copies of the original and all non-identical copies thereof. Any document, record, graph, chart, film or photograph originally produced in color must be provided in color. Furnish all documents whether verified by the Honda or not. If a document is not in the English language, provide both the original document and an English translation of the document.
- **Other Terms:** To the extent that they are used in these information requests, the terms “claim,” “consumer complaint,” “dealer field report,” “field report,” “fire,” “fleet,” “good will,” “make,” “model,” “model year,” “notice,” “property damage,” “property damage claim,” “rollover,” “type,” “warranty,” “warranty adjustment,” and “warranty claim,” whether used in singular or in plural form, have the same meaning as found in 49 CFR 579.4.

In order for my staff to evaluate the alleged defect, certain information is required. Pursuant to 49 U.S.C. § 30166, please provide numbered responses to the following information requests. Insofar as Honda has previously provided a document to ODI, Honda may produce it again or identify the document, the document submission to ODI in which it was included and the precise location in that submission where the document is located. When documents are produced, the documents shall be produced in an identified, organized manner that corresponds with the organization of this information request letter (including all individual requests and subparts). When documents are produced and the documents would not, standing alone, be self-explanatory, the production of documents shall be supplemented and accompanied by explanation.

Please repeat the applicable request verbatim above each response. After Honda's response to each request, identify the source of the information and indicate the last date the information was gathered.

1. State the number of all 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 offered for sale or lease).

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

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 since Honda's August 24, 2011 response to PE 10-047:
  - 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, field reports, 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 item "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.

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's name, address, and telephone number;
  - d. Vehicle identification number (VIN);
  - e. Model;
  - f. Model year;
  - g. Date of manufacture;
  - h. Incident date;
  - i. Report or claim date;
  - j. Summary of the incident;
  - k. Whether a fire was alleged;
  - l. Number of alleged injuries; and
  - m. Number of alleged fatalities.

Provide this information in Microsoft Access 2007, or a compatible format, entitled "REQUEST NUMBER TWO DATA."

4. Produce copies of all documents related to each item within the scope of Request No. 3. Organize the documents separately by category (i.e., consumer complaints, field reports, etc.) and describe the method Honda used for organizing the documents.
5. State a total count for all of the following categories of claims, collectively, that have been paid by Honda that relate to, or may relate to, the alleged defect in the subject vehicles since Honda's August 24, 2011 response to PE 10-047: warranty claims; extended warranty claims; claims for good will 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's 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. Whether the vehicle was in operation at the time of the incident;
- m. Whether the ignition was off at the time of the incident; and
- n. 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 2007, or a compatible format, entitled "WARRANTY DATA."

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 vehicles 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 such extended warranty.
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 such 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 business days.
8. 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.

9. Provide a detailed technical description of operation of the subject vehicle's power window electrical system and all of the features and functionality that it offers. Include in the description a list of all components used, including but not limited to those mentioned in the subject component statement above, the functionality of the electrical circuits that connect them, and describe how the components interact with each other to operate the power windows when the window switches are activated. The description should include how ground and electrical power is supplied to each component and identify all electrical circuits within the driver's door or the door trim panel that are supplied with battery power. Provide electrical wiring diagrams or schematics that identify all of the electrical circuits by circuit number, wire color, and components. Also, provide a diagram that shows where the components, wiring harness connectors, and ground connections are located in the vehicle.
10. In Honda's January 14, 2011 response to question No. 8 of ODI's November 24, 2010 information request letter for PE10-047,<sup>2</sup> Honda stated that it was conducting an investigative action with Omron. The action, identified as QIS (CRV-202004-006), was to conduct failure analyses using failed PWMS returned from vehicles in the "market". Honda's response stated that the action was "under analysis". In Honda's August 24, 2011 response to the information request in PE10-047, Honda provided its conclusion to the action. Honda stated: *"Our analysis indicates that the local melting that may occur does not result in fire. This finding is consistent with field allegations. Due to the low occurrence rate of failure of the Omron power window switches, and the small percentage of failures indicating the presence of smoke, we will continue to monitor the market for future occurrences."* Provide copies of all documents related to this investigative action that have not been provided to ODI, regardless of whether the documents are in interim, draft, or final form, organizing the documents chronologically. Produce all documents related to field allegations as referenced above.
11. Produce all documents (including e-mails) sent to or from Omron relating to the alleged defect. Organize the documents in chronological order.
12. ODI provided Honda with a file containing post fire photographs of the vehicle identified in Honda's Case ID: N012011-0700101066. Provide Honda's assessment of the fire incident depicted in those photographs, including its cause and origin.
13. On January 10, 2012, Honda participated with NHTSA staff in the inspection of the vehicle identified in VOQ report number 10439880. Please provide copies of all information, photographs, reports or other documents prepared by, or for, Honda relating to the inspection. Provide Honda's assessment of the fire, including its cause and origin, in that vehicle.
14. Provide Honda's analysis and assessment of the parts Honda obtained from the vehicle identified in VOQ report number 10425406, including a description of the failure mechanism(s), how the switch failed, and the circuits involved. Provide copies of all documents related to this assessment and analysis, regardless of whether the documents are in interim, draft, or final form, organizing the documents chronologically.

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<sup>2</sup> Question No. 8 related to assessments, analyses, tests, etc., related to the alleged defect.

15. Provide a list of all Omron PWMS used in MY 2005 through 2006 CR-V vehicles. For each PWMS identified provide the following information:
  - a. Supplier;
  - b. Model number/name;
  - c. Part number;
  - d. Application by MY and VIN range;
  - e. How the switch is supplied electrical power, i.e., ignition on (key on) or directly from the battery (key off); and
  - f. How electrical power is isolated from the switch.
  
16. State whether Honda, Honda's suppliers, or any other entity, has conducted any other electrical fire related investigations in MY 2005 through 2006 CR-V vehicles. For any investigations identified, please provide a summary description of each.
  
17. 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, that the alleged defect was occurring or that the subject component was malfunctioning; and
  - f. The reports included with this inquiry.

This letter is being sent to Honda pursuant to 49 U.S.C. § 30166(b) and (e), which authorize NHTSA to conduct any investigation that may be necessary to enforce Chapter 301 of Title 49 and to request reports and the production of things. It constitutes a new request for information. Honda's failure to respond promptly and fully to this letter could subject Honda to civil penalties pursuant to 49 U.S.C. § 30165 or lead to an action for injunctive relief pursuant to 49 U.S.C. § 30163. (Other remedies and sanctions are available as well.) 49 U.S.C. § 30165(a) provides for civil penalties of up to \$6,000 per day, with a maximum of \$17,350,000 for a related series of violations, for failing or refusing to perform an act required under 49 U.S.C. § 30166. *See* 49 CFR 578.6 (as amended by 75 Fed. Reg. 79,978 (Dec. 21, 2010)). This includes failing to respond to ODI information requests.

If Honda cannot respond to any specific request or subpart(s) thereof, please state the reason why it is unable to do so. If on the basis of attorney-client, attorney work product, or other privilege, Honda does not submit one or more requested documents or items of information in response to this information request, Honda must provide a privilege log identifying each document or item withheld, and stating the date, subject or title, the name and position of the person(s) from, and the person(s) to whom it was sent, and the name and position of any other recipient (to include all carbon copies or blind carbon copies), the nature of that information or material, and the basis for the claim of privilege and why that privilege applies.



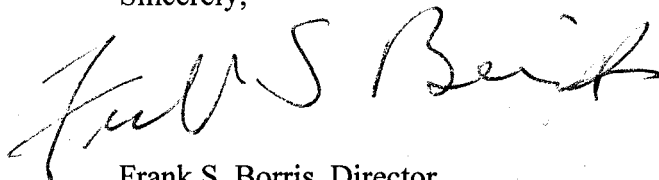
Honda's response to this letter, in duplicate, together with a copy of any confidentiality request, must be submitted to this office by April 27, 2012. **All confidential business information must be submitted directly to the Office of Chief Counsel as described in the following paragraph and should not be sent to this office.** In addition do not submit any confidential business information in the body of the letter submitted to this office. Please refer to EA11-004 in Honda's response to this letter and in any confidentiality request submitted to the Office of the Chief Counsel. If Honda finds that it is unable to provide all of the information requested within the time allotted, Honda must request an extension from Mr. Scott Yon at (202) 366-0139 no later than five business days before the response due date. If Honda is unable to provide all of the information requested by the original deadline, it must submit a partial response by the original deadline with whatever information Honda then has available, even if an extension has been granted.

If Honda claims that any of the information or documents provided in response to this information request constitute confidential commercial material within the meaning of 5 U.S.C. § 552(b) (4), or are protected from disclosure pursuant to 18 U.S.C. § 1905, Honda must submit supporting information together with the materials that are the subject of the confidentiality request, in accordance with 49 CFR Part 512, as amended, to the Office of Chief Counsel (NCC-110), National Highway Traffic Safety Administration, Room W41-326, 1200 New Jersey Avenue, S.E., Washington, D.C. 20590. Honda is required to **submit two copies of the documents containing allegedly confidential information (except only one copy of blueprints) and one copy of the documents from which information claimed to be confidential has been deleted.** Please remember that the word "CONFIDENTIAL" must appear at the top of each page containing information claimed to be confidential, and the information must be clearly identified in accordance with 5 U.S.C. § 512.6. If you submit a request for confidential treatment for all or part of your response to this IR that is in an electronic format (e.g. CD-ROM), your request and associated submission must conform to the requirements in NHTSA's Confidential Business Information Rule regarding submissions in electronic formats (49 CFR 512.6(c)). *See* 72 Fed. Reg. 59,434 (Oct. 19, 2007).

Please send email notification to John Abbott ([John.Abbott@dot.gov](mailto:John.Abbott@dot.gov)) and to [ODI\\_IRresponse@dot.gov](mailto:ODI_IRresponse@dot.gov) when Honda sends its response to this office and indicate whether there is confidential information as part of Honda's response.

If you have any technical questions concerning this matter, please call John Abbott of my staff, at (202) 366-5221.

Sincerely,

A handwritten signature in black ink, appearing to read "Frank S. Borris". The signature is written in a cursive, flowing style.

Frank S. Borris, Director  
Office of Defects Investigation  
Enforcement

VOQ Nos: 10425406, 10439880, and 10437807.