

April 20, 2012

Frank Borris, 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: EA11-012

**2002-04 CR-V, 2003-08 Element, 2003-05 Pilot, 2000-02 Insight, 2001-03 Civic and
2007-08 Fit
Low beam headlight failure**

Dear Mr. Borris:

In reply to your letter dated February 22, 2012, we are submitting our response regarding the allegations of simultaneous low beam headlight failure for the above mentioned vehicles.

We have included an updated file entitled "PRODUCTION DATA" to include 2007-08 Fit and 2000-02 Insight vehicle information.

1. 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 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" 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. See Attachment #Q1 on enclosed CD for summary description for items "c" and "e". Honda did not identify any relevant reports for items "d".

Note: Honda does not have any fleets or participate in fleet sales.

Model	Model Year	A Consumer Complaints	B Field/ Dealer Reports	C-1 Fire Reports	C-2 Crash Reports	C-3 Injury Reports	C-4 Fatality Reports	D Third- Party Arbitration	E Lawsuits
CR-V	2002	52	16	0	0	0	0	0	0
	2003	19	13	0	0	0	0	0	0
	2004	21	6	0	0	0	0	0	0
Element	2003	1	0	0	0	0	0	0	0
	2004	3	2	0	0	0	0	0	0
	2005	3	2	0	0	0	0	0	1
	2006	1	2	0	0	0	0	0	0
	2007	1	1	0	0	0	0	0	0
	2008	0	1	0	0	0	0	0	0
Pilot	2003	30	16	0	1	0	0	0	0
	2004	8	8	0	0	0	0	0	0
	2005	12	20	0	0	0	0	0	0
Insight	2000	42	1	0	1	0	0	0	0
	2001	21	1	0	0	0	0	0	0
	2002	16	0	0	0	0	0	0	0
Civic	2001	760	16	0	1	0	0	0	1
	2002	293	3	0	1	0	0	0	0
	2003	33	5	0	0	0	0	0	1
Fit	2007	97	78	0	4	0	0	0	0
	2008	12	5	0	2	1	0	0	1

Source(s): Customer Relations, Tech Line, Field Reports, Claims and Lawsuits.
As of: April 2, 2012

2. 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;
 - f. Model year;
 - g. Date of manufacture;
 - h. Incident date;
 - i. Report or claim date;
 - j. Whether the report is alleging a headlight electrical circuit failure (yes/no);
 - k. Whether the report is alleging a dual headlight bulb failure (yes/no);
 - l. Number of alleged crashes;
 - m. Number of alleged injuries;
 - n. Number of alleged fatalities;

- o. Whether the vehicle was identified as a vehicle that should receive a recall remedy in Safety Recall No. 04V-086 (yes/no);
- p. Whether the recall was performed (yes/no); and
- q. The date the recall remedy was performed.

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

Response:

The data elements "a" through "q" 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: April 2, 2012

3. 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 #Q3 for copies of all documents on 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: April 2, 2012

4. 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: 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 claims number;
- b. Vehicle owner's name and telephone number;
- c. Vehicle identification number (VIN);
- d. Model;
- e. Model Year;
- f. Vehicle date of manufacture;
- g. Repair date;
- h. Repairing facility's name, telephone number, city and state or ZIP code;
- i. Labor operation number;
- j. Problem code;
- k. Replacement part number(s) and description(s);
- l. Whether the headlight switch was replaced (yes/no);
- m. Whether the headlight switch wiring harness was repaired (yes/no);
- n. Whether the headlight bulbs were replaced (yes/no);
- o. Concern stated by customer;

- p. Comment, if any, by 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."

Response:

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

Model	Model Year	Warranty Claims	Extended Warranty	Goodwill Claims	Warranty Claims - TSB or Campaign	Warranty Claims – Alleged Defect
CR-V	2002	62	3	0	0	17
	2003	53	4	2	0	24
	2004	56	4	2	0	26
Element	2003	16	2	0	0	9
	2004	22	0	0	0	5
	2005	17	1	1	0	1
	2006	11	3	0	0	1
	2007	9	1	2	0	2
	2008	9	0	1	0	1
Pilot	2003	87	6	0	0	6
	2004	63	3	0	0	5
	2005	90	7	4	0	3
Insight	2000	59	7	0	12	11
	2001	20	0	2	2	3
	2002	3	0	0	0	3
Civic	2001	1,177	74	12	11,207	194
	2002	568	3	2	2,893	124
	2003	127	7	2	2	62
Fit	2007	49	6	43	34	7
	2008	20	1	7	32	5

Source(s): Warranty claim data.
As of: March 28, 2012

5. Describe in detail the search criteria used by Honda to identify the claims identified in response to Request No. 4, 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 and mileage 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 headlight assembly and related component part numbers. The contention text description was reviewed for each claim to identify simultaneous loss of low beam headlights. A portion of the claims reviewed were ambiguous as to the exact nature of headlight performance, and we could not discern whether a single low beam headlight had failed, both low beams, one low beam and one high beam, or both high beam headlights had failed. This ambiguity is greater on some models, particularly where either a single dual-filament headlight bulb is used on each side of the vehicle, or on certain model years of some models, the same bulb part number was used in the four separate locations of left and right low beam as well as left and right high beam. Where possible, we have separately identified those claims for which the contention text suggests there was a simultaneous loss of both low beam headlamps or the low beam headlights were not operational, from other claims, though all claims were included.

Coding and Descriptions: See Attachment #Q6 on the enclosed CD.

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, tires or IMA which have their own warranties.

Some vehicles are also covered by the Integrated Motor Assist (IMA) system warranty and the Federal/California emissions warranties. Warranty duration varies depending on component 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 vehicles.

Source(s): Warranty claim data.
As of: March 28, 2012

6. 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 days.

Response: See Attachment #Q7

Currently no communication is planned within the next 120 days.

7. Question No. 8 of ODI's June 1, 2011 information request letter asked, in part, for Honda to provide a detailed technical description of the subject vehicle's headlight system, the features and functionality that it offers, and the components that it consists of. As part of that question, ODI asked Honda to describe how the components interact with each other to illuminate the headlights when the headlight switch is activated by the operator. While documents and diagrams were

provided, a written description was not provided in Honda's response. ODI requests Honda provide the following for each model and model year of the subject vehicles:

- a. Provide a comprehensive written description of each component in the subject vehicle headlight systems;
- b. Describe in detail the features and functionality the headlight system contains;
- c. Describe how the system's components interact to illuminate the headlights and provide the functionalities described above; and
- d. Describe how the operator utilizes the headlight control to access the systems functionality, including a description of how the driver can use the vehicle's high beam headlights.

Additionally, ODI requests that Honda provide the relevant sections of the owner's manuals for the subject vehicles that discuss or describe the headlight system and its functionality, including any instructions, maintenance items, technical details, warnings, or other advice in the owner's manual that may be related.

Response:

- a. See Attachment #Q7a-b
- b. See Attachment #Q7a-b
- c. See Attachment#Q7c-d
- d. See Attachment#Q7c-d

The headlight switch would normally be left in the OFF position when the vehicle is not in use. The driver is required to rotate the headlight switch portion of the combination switch to the ON position to illuminate the headlights. The combination switch is also used to activate the turn signals by moving in the left and right orientation of the steering wheel, respectively, and to switch the high beam headlights on and off by moving the switch to for and aft detent positions perpendicular to the steering wheel, with the position nearest the steering wheel switching the high beam headlights OFF and the position away from the steering wheel the ON position.

8. In Honda's response to question No. 9 of ODI's June 1, 2011 information request letter⁴, Honda stated it was conducting an investigative action relating to headlight failure in MY 2002-2006 CR-V vehicles. The action, identified as "MV20110530104500", was to conduct failure analyses using failed combination switches, terminals and harnesses returned from vehicles in the "market". The action was started on May 16, 2011 and was scheduled to be completed by the end of August 2011. To date, Honda has not provided the results of this action. ODI requests Honda provide the following:

- a. If action "MV20110530104500" has not been completed, provide a written explanation as to why this action has not been completed and the current projection as to when this action will be completed;
- b. If action "MV20110530104500" is complete, provide the date of completion;
- c. Regardless of whether action "MV20110530104500" is complete, provide a detailed and comprehensive description of the action, including its objectives and the work that has been conducted;
- d. Regardless of whether action "MV20110530104500" is complete, provide copies of all documents related to the action, regardless of whether the documents are in interim, draft, or final form, organizing the document chronologically; and
- e. If action "MV20110530104500" is complete, state Honda's assessment of the results, and state any action it plans in response to the result.

Response:

- a. Action "MV20110530104500" has been completed, and is included as Attachment #Q8, including the supporting analysis by the component suppliers involved in this investigation.
 - b. Action "MV20110530104500" was signed off as completed on September 21, 2011.
 - c. The analysis results of MV20110530104500 is included in response to this information request as Attachment #Q8, including the results of the investigation. The objectives of this work were to conduct field examination of failed components to determine the root cause, including detailed materials analysis of all affected components. The conclusion of this analysis was that the low beam headlight terminal in the combination switch wiring harness connector had insufficient margin for movement of the harness during operation of the switch, resulting in sliding of the connector terminals. Sliding of the terminals results in wear of the tin (Sn) plating applied to prevent corrosion of the base copper material of the terminals. When the tin plating becomes worn, the copper may oxidize, and due to heat cycling resulting from that oxidation, the female terminal will lose retention force and the electrical circuit will fail, resulting in a loss of low beam headlights.
 - d. All related documents of the completed analysis are included in this response at Attachments #Q8.
 - e. Our assessment is that the root cause described in response to Question 8c merits a safety recall of affected 2002-2004 model year CR-V and 2003 model year Pilot vehicles. We are continuing to study 2002-2003 Civic and 2004-2005 Pilot vehicles to determine whether the lower failure rate in these vehicles is due to a related or different root cause.
9. In Honda's response to question No. 11 of ODI's June 1, 2011 information request letter⁵ Honda included a comparison of recall claims vs. recall repair kit⁶ part sales for Safety Recall No. 04V-086. Honda stated that there were more kits sold than were installed in Civic vehicles for recall repairs. Honda further stated, "[T]he difference in demand indicates that the Civic recall repair kit was applied to other models to remedy similar contentions for applicable vehicles."⁷ Provide the following information:
- a. Provide Honda's meaning of the word "contentions" as used in the statement quoted above, stating specifically whether or not that means an allegation by a consumer that their Honda vehicles suffered a failure of the headlight system that resulted in a loss of low beam headlights;
 - b. State by make, model and model year the specific vehicle(s) that the recall repair kits, identified by Honda as Combination Light Switch Kit, Part number: 35012-S5A-307, can or likely were applied to or used on for repairing similar headlight system failures;
 - c. State whether Honda, and/or its representatives, have notified, advised, or otherwise directed or instructed any dealership personnel to use the Safety Recall No. 04V-086 recall repair kit to remedy other Honda vehicles that have experienced the same, or a similar low beam headlight failure as the one addressed by Safety Recall No. 04V-086; and
 - d. Provide copies of any and all documents, in any form, that relate to, or may relate to, any such notification, advice, direction or instruction.

Response:

- a. The word "contentions" refers to customer complaints of similar symptoms of a loss of low beam headlights. We use the word contention because these claims are often repaired without confirmation that the root cause is exactly the same as that of the

recall involving 2001 and 2002 model year Civic vehicles. In responding to the information request from ODI we provided data on similar claims and contentions.

- b. *See Attachment #Q9b*
The recall repair kit P/N:35012-S5A-307 is applicable to the following vehicle:
Model name: CIVIC
MY: 2001-02
Manufacturer: HONDA
- c. *Prior to the determination of a defect in 2002-2004 model year CR-V vehicles, Honda Tech-Line informed dealers that low beam headlight failures in the CR-V could be repaired with the Civic recall repair kit. Please see attachment Q9c.*
- d. *Please see Attachment #Q9d*

10. On February 24, 2004, Honda submitted a "Defect and noncompliance information report" to notify the agency of its decision to conduct a safety recall on certain MY 2001 and MY 2002 Civic and MY 2000-2002 Insight vehicles to remedy a defect in the of the low beam headlight circuit that rendered the low beam headlights inoperative. NHTSA assigned Safety Recall No. 04V-086 to Honda's recall action. Regarding Safety Recall NO. 04V-086:
 - a. Provide the following information in a Microsoft Access 2007 database, or a compatible format, entitle "CIVIC_RECALL" containing a list of the VINs of vehicles that were recalled, and for each VIN;
 - i. The vehicle production date;
 - ii. The warranty state date;
 - iii. The U.S. state the vehicle was originally sold in, or delivered for sale;
 - iv. Whether the recall was conducted on the vehicle (Y/N), and;
 - v. The date of application of the remedy, if one was applied.
 - b. State the part number(s) of the recall remedy repair kit(s), the vehicle make, model, and model year it was intended for, and Honda's total sales by part number and by month and year of sale from February 4, 2004 to the present;
 - c. Provide the total number (counts) of each of the following that Honda received, or was otherwise aware of, as of the date that Honda determined that a safety recall should be initiated in the U.S., and, for the vehicles within the scope of the recall action, state by make, model, and model year, the total number (counts) of each of the following that Honda received, or was otherwise aware of;
 - i. Consumer complaints;
 - ii. Warranty claims;
 - iii. Crashes or crash allegations;
 - iv. Injuries or injury allegations;
 - v. Fatalities or fatality allegations.
 - d. Provide a narrative description on any and all similarities or differences between the lighting system(s) of the vehicles within the scope of Safety Recall No. 04V-086 and the subject components of the subject vehicles;
 - e. Describe all assessments, analyses, tests, test results, studies, surveys, simulations, investigations, inquiries and/or evaluations (collectively, "action") that led to, or preceded the determination to conduct Safety Recall No. 04V-086 and its remedy. For each such action, provide the following information:
 - i. Action title or identifier;
 - ii. The actual or planned start date;
 - iii. The actual or expected end date;
 - iv. Brief summary of the subject and objective of the action;
 - v. Engineering group(s)/supplier(s) responsible for designing and for conducting the action;
 - vi. A brief summary of the findings and/or conclusions resulting from the action; and

- vii. Whether each action is identified in the and/or described in the Chronology (Part 573.5 (c)(6)) section of the Safety Recall No. 04V-086 defect and non-compliance report.

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.

- f. For the defect issue address by Safety Recall No. 04V-086, provide any and all assessments, analysis, testing, and/or investigations involving the failure mode, failure mechanism, failure rate, failure trend, failure projection(s), failure consequence(s), and/or the effectiveness of the recall remedy, that Honda has, or had conducted.

For each assessments, analysis, testing, and/or investigations identified, provide copies of all documents related to the assessments, analysis, testing, and/or investigations, regardless of whether the documents are in interim, draft, or final form. Organize the documents chronologically by action.

Response:

- a. See Attachment #Q10a

- b. See Attachment #Q10b

The recall repair kit for the recall of 2001-02 Civic was intended for the following vehicles.

Model name: CIVIC

MY: 2001-02

Manufacturer: HONDA

The recall repair kit for the recall of 2000-02 Insight was intended for the following vehicles.

Model name: INSIGHT

MY: 2000-02

Manufacturer: HONDA

- c. *We have not retained the records from our decision making process and due to our company record retention policy, most warranty and other records from this period have been purged. However, using the data we were able to capture for responses to questions #1 and #4 we have estimated that Honda was aware of 77 consumer complaints, 1,709 warranty claims and no allegations of crashes, injuries or fatalities at the time the decision to conduct a safety recall was made. Additionally, this data is included in the responses to questions #1 and #4 and can be determined by sorting the data to include all claims prior to the date of notification to NHTSA of our defect determination – though this may include claims that Honda became aware of after the defect decision was made. Honda notified NHTSA of 04V-086 involving 2001 and 2002 model year Civic vehicles and 2000-2002 model year Insight vehicles on February 27, 2004.*
- d. See Attachment #Q7a-b
- e. See Attachment #Q10e
- f. See Attachment #Q10f

11. Provide a detailed technical description comparing the headlight system for the vehicles within the scope of Safety Recall No. 04V-086 with the subject vehicles. Include a description comparing similarities or differences in the features and functionality that are offered, and the components in the headlight system.

Response: See Attachment #Q7a-b

12. Provide an electrical and mechanical schematic for the headlight system for the vehicles associated with Safety Recall No. 04V-086 that shows the components, how power and ground is provided to each, and the functionality and features of the electrical circuits that connect them. Provide a diagram that shows where the components are located on each vehicle. Describe any optional features that are offered for the headlight system, such as automatic dimming or illumination.

Response: See Attachment #Q12

13. On December 15, 2012, Honda submitted a "Defect and noncompliance information report" to notify the agency of its decision to conduct a safety recall on certain MY 2007 and MY 2008 Fit vehicles to remedy a defect in the of the low beam headlights that rendered the low beam headlights inoperative. NHTSA assigned Safety Recall number 10V-624 to Honda's recall action. Regarding Safety Recall No. 10V-624:
- a. Provide the following information in a Microsoft Access 2007 database, or a compatible format, entitle "FIT_RECALL" containing a list of the VINs of vehicles that were recalled, and for each VIN;
 - i. The vehicle production date;
 - ii. The warranty state date;
 - iii. The U.S. state the vehicle was originally sold in, or delivered for sale;
 - iv. Whether the recall was conducted on the vehicle (Y/N), and;
 - v. The date of application of the remedy, if one was applied.
 - b. State the part number(s) of the recall remedy repair kit(s), the vehicle make, model, and model year it was intended for, and Honda's total sales by part number and by month and year of sale from December 15, 2010 to the present;
 - c. Provide the total number (counts) of each of the following that Honda received, or was otherwise aware of, as of the date that Honda determined that a safety recall should be initiated in the U.S., and, for the vehicles within the scope of the recall action, state by make, model, and model year, the total number (counts) of each of the following that Honda received, or was otherwise aware of;
 - i. Consumer complaints;
 - ii. Warranty claims;
 - iii. Crashes or crash allegations;
 - iv. Injuries or injury allegations;
 - v. Fatalities or fatality allegations.
 - d. Provide a narrative description on any and all similarities or differences between the lighting system(s) of the vehicles within the scope of Safety Recall No. 10V-624 and the subject vehicles by model and model year;
 - e. Describe all assessments, analyses, tests, test results, studies, surveys, simulations, investigations, inquiries and/or evaluations (collectively, "action") that led to, or may have led to, the determination to conduct Safety Recall No. 10V-624 and its remedy. For each such action, provide the following information:
 - i. Action title or identifier;
 - ii. The actual or planned start date;
 - iii. The actual or expected end date;
 - iv. Brief summary of the subject and objective of the action;
 - v. Engineering group(s)/supplier(s) responsible for designing and for conducting the action;
 - vi. A brief summary of the findings and/or conclusions resulting from the action; and

- vii. Whether each action is identified in the and/or described in the Chronology (Part 573.5 (c)(6)) section of the Safety Recall No. 10V-624 defect and non-compliance report.

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.

- f. For the defect issue address by Safety Recall No. 10V-624, provide any and all assessments, analysis, testing, and/or investigations involving the failure mode, failure mechanism, failure rate, failure trend, failure projection(s), failure consequence(s), and/or the effectiveness of the recall remedy, that Honda has, or had conducted.

For each assessments, analysis, testing, and/or investigations identified, provide copies of all documents related to the assessments, analysis, testing, and/or investigations, regardless of whether the documents are in interim, draft, or final form. Organize the documents chronologically by action.

Response:

- a. See Attachment #Q13a
b. The recall repair kit for the recall of 2007-08 Fit was intended for the following vehicles.
Model name: FIT
MY : 2007-08
Manufacturer: HONDA
c. Our record from the defect determination process indicates that Honda was aware of 152 warranty claims at the time the decision to conduct a safety recall was made. The document involved in the decision making process does not list consumer complaints, crash, injury or fatality records. In addition, this data is included in the responses to questions #1 and #4 and can be determined by sorting the data to include all claims prior to the date of notification to NHTSA of our defect determination. The tally of warranty records in response to question #4 may reflect fewer warranty claims, due to records that may have been purged in accordance with our corporate record retention policy. Honda notified NHTSA of 10V-624 involving 2007 and 2008 model year Fit vehicles on December 15, 2010.
d. See Attachment #Q7a-b
e. See Attachment #Q13e
f. See Attachment #Q13f
14. Provide a detailed technical description comparing the headlight system for the vehicles within the scope of Safety Recall No. 10V-624 with the subject vehicles. Include a description comparing similarities or differences in the features and functionality that are offered, and the components in the headlight system.

Response: See Attachment #Q7a-b

15. Provide an electrical and mechanical schematic for the headlight system for the vehicles associated with Safety Recall No. 10V-624 that shows the components, how power and ground is provided to each, and the functionality and features of the electrical circuits that connect them. Provide a diagram that shows where the components are located on each vehicle. Describe any optional features that are offered for the headlight system, such as automatic dimming or illumination.

Response: See Attachment #Q12

16. Provide a list of all recalls, campaigns, or similar actions, since January 2, 2001, where Honda determined a defect or problem condition existed in the low beam headlights of a vehicle manufactured by Honda for sale or lease outside of the United States. Include the following information:
- a. Model of vehicle affected;
 - b. Model Years of Vehicle affected;
 - c. Name of the substantially similar U.S.-market model, if one exists;
 - d. Description of the defect or problem condition;
 - e. Description of the remedy for the defect or problem condition;
 - f. The part number(s) associated with the remedy of the defect or problem condition;
 - g. Name of the country where the recall, campaign, or similar action was performed;
 - h. Date on which a government or quasi-governmental agency was notified of the recall, campaign, or similar action;
 - i. Name of the governmental or quasi-governmental agency that was informed; and
 - j. Date in which NHTSA was informed of the recall.
- Provide a copy of any documents submitted to a governmental or quasi-governmental agency regarding a defect of problem condition listed above.

Response: See Attachment #Q16

Sincerely,

AMERICAN HONDA MOTOR CO., INC.



Jay Joseph
Senior Manager
Product Regulatory Office

JWJ:nis

Attachments