

**Electronic Mail**

**HONDA**

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September 7, 2012

Mr. D. Scott Yon  
U.S. DEPARTMENT OF TRANSPORTATION  
National Highway Traffic Safety Administration  
Vehicle Integrity Division, Office of Defects Investigation

**Subject: EA11-012 Model Years 2002 – 2004 Honda CR-V Low Beam Headlights  
Request for Confidentiality  
Model Years 2003 – 2008 Honda Element Information**

Dear Mr. Yon:

We are providing this letter to the National Highway Traffic Safety Administration (NHTSA) Office of Defects Investigation in order to provide additional detail regarding the decision by Honda to exclude 2003 - 2008 Honda Element vehicles from recall campaign 12V-136. Affected vehicles included in campaign 12V-136 are certain 2002 – 2004 Honda CR-V and 2003 Honda Pilot vehicles and, as of August 31, 2012, certain 2002 – 2003 Honda Civic and 2004 – 2005 Honda Pilot vehicles.

As we have discussed, model years 2003 – 2008 Honda Element vehicles have exhibited low failure rates of the low beam headlights as measured by warranty claims as well as consumer complaints that have been received by both Honda and NHTSA. The first page of the enclosed documentation summarizes the claim and complaint rates for each of the models subject to EA11-012.

Honda believes that the low failure rate of the low beam headlights in 2003 – 2008 Honda Element vehicles may be due in large part to the significant difference in the amount of force that the Honda Element headlight switch is subjected to, in comparison to other models. The characteristics of the forces applied to the headlight switch are illustrated on the second page of the enclosed documentation.

Pursuant to the provisions of 49 CFR Part 512, Honda has submitted confidential copies of the enclosed documentation under a Request for Confidentiality to NHTSA's Office of the Chief Counsel. The redacted information is considered confidential and proprietary, and Honda does not customarily release this type of information to the public.

Sincerely,

AMERICAN HONDA MOTOR CO., INC.



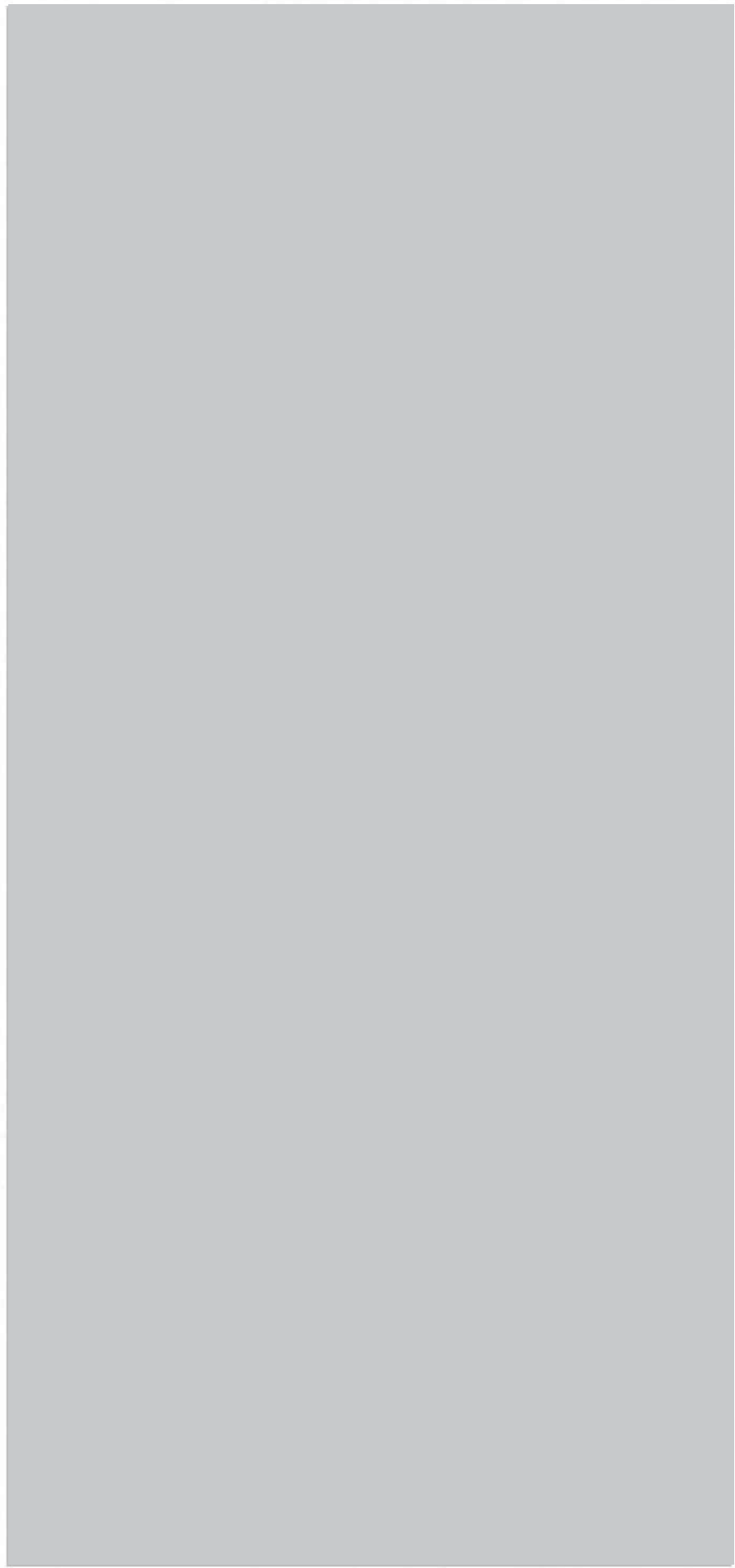
Jay Joseph  
Senior Manager  
Product Regulatory Office

JWJ:dj

cc: Office of the Chief Counsel, NHTSA  
John Abbott, NHTSA

Enclosure

ENTIRE PAGE CONFIDENTIAL BUSINESS INFORMATION



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