

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

July 19, 2011

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

**Re: NVS-212jfa / PE11-017  
2002-04 Honda CR-V  
Low beam headlight failure**

Dear Mr. Yon:

In reply to your letter dated June 1, 2011, we are submitting a final, complete response regarding the allegations of simultaneous low beam headlight failure in model year (MY) 2002 through 2004 Honda CR-V vehicles. This completes our response, and follows the partial response submitted on the original July 12, 2011 due date. For your convenience, this document includes the content from our earlier response, and includes all additional information necessary to complete our response. In addition, we are providing a new data CD with all of the additional information, and any corrections we have identified since July 12, 2011.

As we have previously discussed, Honda has excluded providing data for the MY 2000 through 2001 Honda S2000 for the following reasons:

1. The HID headlights of the S2000 differ from the sealed beam headlights on the other subject vehicles;
2. The S2000 has a different wiring harness configuration;
3. The headlight/turn signal combination switch of the S2000 does not use pin#6 of the switch/wiring harness connector as the other subject vehicles; and
4. The S2000 does not exhibit a high failure rate.

1. **State the number of all subject vehicles Honda has manufactured for sale in the United States. Separately, for each subject vehicle manufactured to date by Honda, state the following:**
  - a) Vehicle identification number (VIN);
  - b) Model;
  - c) Model Year;
  - d) Date of manufacture;
  - e) Date warranty coverage commenced; and
  - f) 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 2007, or a compatible format, entitled "PRODUCTION DATA."

**Response:**

*The data elements "a" through "f" are provided in the file titled "PRODUCTION DATA" on the enclosed CD. There are separate tables for each model.*

*Please note that the production numbers for the 2003-2005 MY Civic have been updated since our July 12, 2011 submission to include the Civic Hybrid.*

Model	Model Year	Sales
CR-V	2002	137,795
	2003	140,193
	2004	153,256
	2005	144,217
	2006	149,583
Element	2003	76,087
	2004	56,347
	2005	52,402
	2006	45,120
	2007	33,566
	2008	37,975
Pilot	2003	122,946
	2004	135,910
	2005	142,268
	2006	147,975
	2007	121,949
	2008	88,633
Civic	2001	342,586
	2002	330,127
	2003	300,104
	2004	290,478
	2005	288,839

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 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 "b" are stated in the table below. See Attachment #Q2 for a summary description of items "c" through "e" on the enclosed CD.*

*Note: Honda does not have any fleet sales.*

Model	Model Year	A Consumer Complaints	B Field/ Dealer Reports	C Crash, Injury, Fatality Reports	D Third-Party Arbitration	E Lawsuits
CR-V	2002	22	15	0	0	0
	2003	12	12	0	0	0
	2004	13	3	0	0	0
	2005	10	8	0	0	1
	2006	15	16	0	0	1
Element	2003	1	0	0	0	0
	2004	1	2	0	0	0
	2005	2	2	0	0	1
	2006	1	2	0	0	0
	2007	1	1	0	0	0
	2008	0	1	0	0	0
Pilot	2003	19	15	0	0	0
	2004	4	6	0	0	0
	2005	7	14	0	0	0
	2006	2	1	0	0	0
	2007	3	2	0	0	0
	2008	0	5	0	0	0
Civic*	2001*	195	16	2	0	1
	2002*	94	2	0	0	0
	2003	17	4	3	0	1
	2004	2	2	0	0	0
	2005	5	7	0	0	0

\*2001 and 2002 Civic were recalled for low beam headlight failures, see NHTSA Campaign No. 04V-086.

Source(s): Customer Relations, Tech Line, Field Reports, Claims and Lawsuits.  
As of: June 14, 2011

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;
- 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 simultaneous headlight bulb failure (yes/no);
- l) Number of alleged crashes;
- m) Number of alleged injuries; and
- n) Number of alleged fatalities.

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

Response:

*The data elements "a" through "n" 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: June 14, 2011

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. Please note that the copies of the 2001 Civic Consumer Complaints is broken into two groups, A and B.*

Source(s): Customer Relations, Tech Line, Field Reports, Claims and Lawsuits.  
As of: June, 10, 2011

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: 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's name and telephone number;
- c) Vehicle identification number (VIN);
- d) Model;
- e) Model Year;
- f) Vehicle date of manufacture;
- g) Repair date;
- h) Vehicle mileage at time of repair;

- i) Repairing facility's name, telephone number, city and state or ZIP code;
- j) Labor operation number;
- k) Problem code;
- l) Replacement part number(s) and description(s);
- m) Whether the headlamp switch was replaced (yes/no);
- n) Whether the headlamp wiring harness was repaired (yes/no);
- o) Whether the headlamp bulbs were replaced (yes/no);
- p) Concern stated by customer; and
- q) 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."

Response:

*The total warranty counts are provided in the table below. The data elements "a" through "q" are provided in the file titled "WARRANTY DATA" on the enclosed CD. We have separated the warranty claims into three categories: 1) Warranty Claims (inc. warranty claims, extended warranty and goodwill claims), 2) Warranty Claims related to or may relate to a TSB or Campaign and 3) Warranty Claims which may relate to the alleged defect. Please note that not all warranty claims for bulbs include a quantity, as the quantity is not a required field for warranty reimbursement to a dealer, the assumed quantity is one.*

Model	Model Year	Warranty Claims	Extended Warranty	Goodwill Claims	Warranty Claims - TSB or Campaign	Warranty Claims - Alleged Defect?
CR-V	2002	52	3	0	1	16
	2003	41	4	2	2	13
	2004	46	4	1	2	16
	2005	367	2	9	0	32
	2006	396	0	7	0	39
Element	2003	13	2	0	0	9
	2004	13	0	0	0	8
	2005	17	1	1	0	3
	2006	12	3	0	0	2
	2007	12	1	2	0	0
	2008	11	0	1	0	1
Pilot	2003	68	6	0	4	16
	2004	53	2	0	0	16
	2005	77	5	1	3	18
	2006	15	1	0	0	6
	2007	14	0	0	0	10
	2008	45	0	7	0	15
Civic*	2001*	980	65	2	11,200	250
	2002*	461	1	0	2,886	82
	2003	86	4	2	3	52
	2004	63	1	0	1	14
	2005	64	3	0	1	13

\*2001 and 2002 Civic were recalled for low beam headlight failures, see NHTSA Campaign

No. 04V-086.

Source(s): Warranty claim data.

As of: July 6, 2011

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 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 we are confident there was a simultaneous loss of both low beam headlamps 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: July 6, 2011

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: See Attachment #Q7 on the enclosed CD.

*No communication is planned within the next 120 days.*

8. 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. Include in the description a list of all components used, including but not limited to those mentioned in the subject component statement above, and describe how the components interact with each other to illuminate the headlights when the headlight switch is activated by the operator. Provide an electrical and/or mechanical schematic that shows the components, how power and ground is provided to each, and the functionality of the electrical circuits that connect them. Provide a diagram that shows where the components are located on the vehicle. Describe any optional features that are offered for the headlight system, such as auto dimming or illumination, etc.

Response: See Attachment #Q8 on the enclosed CD.

9. 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:

- 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.

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 seven documents included in Attachment #Q9:*

*Document 1: Quality Improvement Sheet (QIS)*

- a) *Action title or identifier: QIS (MV20011212130757)*
- b) *The actual or planned start date: December 12, 2001*
- c) *The actual or expected end date: March 1, 2004*
- 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 combination switch, terminals and harness) 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 conducted based on internal design requirements.*



*The analysis was conducted by the Honda Automobile Quality Analysis Office, Toyo Denso and Sumitomo Denso (the latter two are the suppliers of the component).*

- f) A brief summary of the findings and/or conclusions resulting from the action: Movement/oxidation of the terminal increased the contact resistance value. Under this condition, the load current (approx. 10 A) for the low beam headlights generated heat and caused the terminal to melt. The specification of the lighting and turn signal switch was changed to include tin-plating on the terminal to reduce the contact resistance value. Recall (04V-086) was conducted to remedy vehicles manufactured before the change was applied to mass production vehicles.*

*Document 2: Quality Improvement Sheet (QIS)*

- a) Action title or identifier: QIS (MV20020523100005)*
- b) The actual or planned start date: May 17, 2002*
- c) The actual or expected end date: February 26, 2004*
- 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 combination switch, terminals and harness) 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 conducted based on internal design requirements within Honda Automobile Quality Analysis Office, Toyo Denso and Sumitomo Denso (the latter two are the suppliers of the component).*
- f) A brief summary of the findings and/or conclusions resulting from the action: Movement/oxidation of the terminal increased the contact resistance value. Under this condition, the load current (approx. 10 A) for the low beam headlights generated heat and caused the terminal to melt. The specification of the lighting and turn signal switch was changed to include tin-plating on the terminal to reduce the contact resistance value. Recall (04V-086) was conducted to remedy vehicles manufactured before the change was applied to mass production.*

*Document 3: Quality Improvement Sheet (QIS)*

- a) Action title or identifier: QIS (MV20031031113105)*
- b) The actual or planned start date: October 15, 2003*
- c) The actual or expected end date: March 1, 2004*
- 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 combination 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 conducted based on internal design requirements. The analysis was conducted by the 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: Melting of the component designed to keep the controller knob of the combination switch in place for the movable contact in the lighting and turn signal combination switch resulted in a reduction of contact pressure, in turn causing poor electrical contact. Despite the presumed flow of overcurrent, the cause is undetermined.*

*Document 4: Quality Improvement Sheet (QIS)*

- a) Action title or identifier: QIS (MV20040525155700)*
- b) The actual or planned start date: February 12, 2004*
- c) The actual or expected end date: May 31, 2004*



- d) *Brief summary of the subject and objective of the action: Analysis of the cause of the failure using actual failed parts (harness terminal) 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 conducted based on internal design requirements. The analysis was conducted by the Honda Automobile Quality Analysis Office and Sumitomo Denso, the supplier of the component.*
- f) *A brief summary of the findings and/or conclusions resulting from the action: A female wiring harness terminal appeared to have been deformed by some physical operation that made the contact unstable, causing heat generation in the vicinity of the terminal. The cause of the deformation of the female terminal is undetermined.*

*Document 5: Quality Improvement Sheet (QIS)*

- a) *Action title or identifier: QIS (MV20050621164605)*
- b) *The actual or planned start date: June 8, 2005*
- c) *The actual or expected end date: December 28, 2005*
- d) *Brief summary of the subject and objective of the action: Analysis of the cause of the failure using actual failed parts (harness terminal) 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 conducted based on internal design requirements. The analysis was conducted by the Honda Automobile Quality Analysis Office and Sumitomo Denso, the supplier of the component.*
- f) *A brief summary of the findings and/or conclusions resulting from the action: From inspection of the provided female terminal it appears that the male terminal contacted the female terminal on the wiring harness side at an abnormal angle, making the contact unstable and leading to heat generation in the area of the terminal. Without the mating component, in this case the actual failed male terminal on the combination switch from the same vehicle, the cause remains undetermined.*

*Document 6: Quality Improvement Sheet (QIS)*

- a) *Action title or identifier: QIS (MV20060425175556)*
- b) *The actual or planned start date: April 25, 2006*
- c) *The actual or expected end date: September 14, 2007*
- 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 combination switch, terminals and harness) 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 conducted based on internal design requirements. The analysis was conducted by the Honda Automobile Quality Analysis Office, Toyo Denso and Sumitomo Denso (the latter two are the suppliers 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, however we were unable to reach any conclusion regarding the cause of this condition.*

*Document 7: Quality Improvement Sheet (QIS)*

- a) *Action title or identifier: QIS (MV20110530104500)*
- b) *The actual or planned start date: May 16, 2011*

- c) *The actual or expected end date: Under investigation, conclusion will be provided by the end of August 2011.*
  - 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 combination switch, terminals and harness) 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 conducted based on internal design requirements. The analysis was conducted by the Honda Automobile Quality Analysis Office, Toyo Denso and Sumitomo Denso (the latter two are the suppliers of the component).*
  - f) *A brief summary of the findings and/or conclusions resulting from the action: This investigation is under way at this time and will provide by the end of August 2011.*
10. 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:

*There are four specification changes. The first change consisted of the addition of tin-plating to the low-beam terminal of the combination switch applied to the CR-V and Civic, and is described as Change-point 1 below. The second change summarizes an overall styling and specification change to that was applied to the CR-V, Civic and Pilot. This change modified the design of the headlamp assemblies, from the original single-lamp design that used a dual-filament low-beam/high-beam bulb to new designs for each model that used separate low- and high-beam reflectors within each lamp, with separate low- and high-beam bulbs. The third change consisted of applying a slightly longer wiring harness that attached to the headlight/turn signal combination switch for the 2004 Pilot, to ease assembly at the manufacturing facility. The fourth change, identified as Change-point 4 below, describes a specification change to the 2007 Element SC model, which was the only model of the Element to apply HID headlamps. Each of these changes are described in detail below:*

*Change-point 1: Tin-plating was added to the terminal of the low beam circuit in the lighting and turn signal combination switch for the CR-V and Civic.*

- a) *The date or approximate date on which the modification or change was incorporated into vehicle production:*
  - November 5, 2001

- b) A detailed description of the modification or change:
  - Tin-plating was added to the male terminal of low beam circuit
- c) The reason(s) for the modification or change:
  - This modification was applied as a countermeasure to prevent the terminals from melting due to an overvoltage condition.
- d) The part numbers (service and engineering) of the original component:
  - Service part numbers: 35255-S5A-A01 and 35255-S2H-G02
  - See Attachment #Q10 Change-point 1.
- e) The part number (service and engineering) of the modified component:
  - Service part number: 35255-S5A-A02
- f) Whether the original unmodified component was withdrawn from production and/or sale, and if so, when:
  - On September 13, 2005, the inventory of the original unmodified component was depleted and the suffix was changed from A01 to A02 to indicate that the part had been superseded.
  - On December 1, 2009, the inventory of the original unmodified component was depleted and the suffix was changed from S2H-G02 to S5A-A02 to indicate that the part had been superseded.
- g) When the modified component was made available as a service component:
  - August 14, 2003
- h) Whether the modified component can be interchanged with earlier production components:
  - The original and later designs are interchangeable.

Change-point 2: Modification of headlight system for CR-V, Civic and Pilot.

- a) The date or approximate date on which the modification or change was incorporated into vehicle production:

CR-V: From start-up of 05MY production to minor model change

- Honda Motor Co., Ltd. (HMC) – Sayama: March 19, 2004
- Honda of the UK Manufacturing Ltd. (HUM): September 8, 2004

Civic: From start-up of 04MY production to minor model change

- Honda Motor Co., Ltd. (HMC) – Suzuka: June 30, 2003
- Honda of the UK Manufacturing Ltd. (HUM): October 28, 2003
- Honda Canada Manufacturing, Inc. (HCM): August 26, 2003
- Honda of America Manufacturing, Inc. (HAM): July 10, 2003

Pilot: From start-up of 06MY production to 08MY

- Honda Manufacturing of Alabama (HMA): July 21, 2005
- Honda Canada Manufacturing, Inc. (HCM): July 19, 2005

- b) A detailed description of the modification or change:
  - The original headlamp designs were 2-lamp designs utilizing a single dual-filament bulb within each of the left and right headlamp assemblies, for a total of two headlamp bulbs. The revised designs utilized a separate low-beam and high-beam lamp within each headlamp in which the low beam current does not go through the combination switch. Using two lamps within each headlight assembly, the new designs relied on a total of four lamps, two each for the low beam and high beam headlights.

- c) *The reason(s) for the modification or change:*
  - *This design changes were part of overall mid-cycle design refreshenings that had been previously planned.*
- d) *The part numbers (service and engineering) of the original component:*
  - *See Attachment #Q10 Change-point 2*
- e) *The part number (service and engineering) of the modified component:*
  - *See Attachment #Q10 Change-point 2*
- f) *Whether the original unmodified component was withdrawn from production and/or sale, and if so, when:*
  - *See Attachment #Q10 Change-point 2*
- g) *When the modified component was made available as a service component:*
  - *See Attachment #Q10 Change-point 2*
- h) *Whether the modified component can be interchanged with earlier production components:*
  - *Only the switch assembly is interchangeable between the original and revised designs for the CR-V, Civic and Pilot.*

*Change-point 3: Steering beam harness extension for Pilot*

- a) *The date or approximate date on which the modification or change was incorporated into vehicle production:*

*Pilot: From start-up of 04M production to 08MY*

- *Honda Canada Manufacturing, Inc. (HCM): August 12, 2003*

- b) *A detailed description of the modification or change:*
  - *The length of the steering beam wiring harness was extended by 10mm.*
- c) *The reason(s) for the modification or change:*
  - *To improve to be ease of assembly at factory per the factory's request. Subsequently, we learned that this change reduced tension on the wiring harness connector and resulted in a slightly lower failure rate. This eventually resulted in a service bulletin to address the possibility of failures due to tension at the wiring harness connector (AHM Service Bulletin 07-027 issued in May, 2007).*
- d) *The part numbers (service and engineering) of the original component:*
  - *Service part numbers: 32150-S9V-A010  
32150-S9V-A110  
32150-S9V-A210*
- e) *The part number (service and engineering) of the modified component:*
  - *Service part numbers: 32150-S9V-A010  
32150-S9V-A110  
32150-S9V-A210*
- f) *Whether the original unmodified component was withdrawn from production and/or sale, and if so, when:*
  - *Service parts for the original unmodified wire harness for the 2004 Pilot are still available at this time.*
- g) *When the modified component was made available as a service component:*
  - *Component has not been modified*
- h) *Whether the modified component can be interchanged with earlier production components:*
  - *Due to other changes to the headlight electrical circuit applied to the 2004 and later model year Pilot vehicles, the wiring harnesses for 2003 and later years are not interchangeable.*

*Change-point 4: Addition of a new Element SC grade with exclusive projector-beam headlights in the 2007 model year.*

- a) *The date or approximate date on which the modification or change was incorporated into vehicle production:*

*Element: From start-up of 07M production through 08MY*

- *Honda of America Manufacturing, Inc. (HAM): June 1, 2006*

- b) *A detailed description of the modification or change:*
- *A new grade of Element, the SC, was added with grade-level exclusive projector-beam HID headlamps. All other grades of the Element continued to apply the same multi-reflector Halogen headlamps.*
- c) *The reason(s) for the modification or change:*
- *This change was applied to the Element SC to support the sporty character and performance appeal of the SC gradelevel.*
- d) *The part numbers (service and engineering) of the original component:*
- *See Attachment #Q10 Change-point 4*
- e) *The part number (service and engineering) of the modified component:*
- *See Attachment #Q10 Change-point 4*
- f) *Whether the original unmodified component was withdrawn from production and/or sale, and if so, when:*
- *The original parts were not withdrawn, application of the original design continued on all grade levels of the Element other than the SC grade which exclusively applied HID projector beam headlamps.*
- g) *When the modified component was made available as a service component:*
- *Service parts for the HID projector beam headlamps applied to the Element SC were made available as that grade level was introduced to the market.*
- h) *Whether the modified component can be interchanged with earlier production components:*
- *Components specific to the Element SC HID projector beam headlamps, such as the headlamp assemblies, the high-voltage components, and the wiring harness in the engine room area are not interchangeable. However the headlamp and turn signal combination switch is interchangeable between the Element SC and all other grade levels of the Element.*

11. **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):**

- a) **Subject component(s); and**  
b) **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:**



**Parts Demand:** See Attachment #Q11 Parts Demand on the enclosed CD.

*Included with this information is a comparison of parts demand for the Civic recall repair kit and actual repairs for which claims were filed for the Civic recall. More of the Civic recall repair kits were sold than were installed in Civic vehicles for recall repairs. The difference in demand indicates that the Civic recall repair kit was applied to other models to remedy similar contentions for applicable vehicles. See Attachment #Q11 Civic Parts Demand Comparison on enclosed CD.*

**Supplier Contact Information:** See Attachment #Q11 Supplier Contact on the enclosed CD.

**12. 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.

**Response:**

*After review of the original July 12, 2011 response we have determined that we did address all models included in the engineering analysis. The responses below apply to all models included in the engineering analysis, unless otherwise noted. Please note that in response to item b) below, we have added additional information related to the steering beam wiring harness.*

- a) *The causal or contributory factor(s)*  
*The terminal contact pressure of the wiring harness connector of the lighting & turn signal combination switch and the instrument panel wiring harness was reduced after assembly, 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 combination switch to the instrument panel wiring harness is within design specifications. We understand that the terminal contact pressure within the wiring harness connector in the units that have failed was reduced due to an undetermined cause.*  
*In case of 2003 model year Pilot, Honda has confirmed that the steering beam wiring harness was too short in length and may have been misrouted in some rare cases, causing the terminal contact pressure to be too low. If this occurred, it would have been possible for both low beam headlights to fail simultaneously.*
- c) *The failure modes(s):*  
*If the alleged failure has occurred, 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:*

*If the low beam headlights do not illuminate, causing the driver to rely on the high beam headlights or ambient lighting to drive. This condition could result in reduced visibility while driving at night.*

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

*There are no warnings to the driver 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
10389638	SHSRD78822U [REDACTED]	No information related to this allegation were found within Honda in-house data, such as CRMS, WARRANTY, or TECHLINE. Therefore, without confirming the actual failed parts, we cannot determine the cause with only limited information provided.
10387708	SHSRD78853U [REDACTED]	No information related to this allegation were found within Honda in-house data, such as CRMS, WARRANTY, or TECHLINE. Therefore, without confirming the actual failed parts, we cannot determine the cause with only limited information provided.
10384717	JHLRD68402C [REDACTED]	No information related to this allegation were found within Honda in-house data, such as CRMS, WARRANTY, or TECHLINE. Therefore, without confirming the actual failed parts, we cannot determine the cause with only limited information provided.
10380117	JHLRD78812C [REDACTED]	Even though the customer contacted American Honda to complain, with only the limited information provided, we cannot determine the cause without confirming the actual failed parts.
10368693	SHSRD78843U [REDACTED]	No information related to this allegation were found within Honda in-house data, such as CRMS, WARRANTY, or TECHLINE. Therefore, without confirming the actual failed parts, we cannot determine the cause with only limited information provided.
10362242	SHSRD78803U [REDACTED]	Even though the customer contacted American Honda to complain, with only the limited information provided, we cannot determine the cause without confirming the actual failed parts.
10350508	JHLRD778X2C [REDACTED]	Even though the customer contacted American Honda to complain, with only the limited information provided, we cannot determine the cause without confirming the actual failed parts.



10334737	JHLRD77893C	No information related to this allegation were found within Honda in-house data, such as CRMS, WARRANTY, or TECHLINE. Therefore, without confirming the actual failed parts, we cannot determine the cause with only limited information provided.
10306665	JHLRD78422C	Even though the customer contacted American Honda to complain, with only the limited information provided, we cannot determine the cause without confirming the actual failed parts.
10305931	SHSRD78863U	Even though the customer contacted American Honda to complain, with only the limited information provided, we cannot determine the cause without confirming the actual failed parts.
10208098	JHLRD78852C	No information related to this allegation were found within Honda in-house data, such as CRMS, WARRANTY, or TECHLINE. Therefore, without confirming the actual failed parts, we cannot determine the cause with only limited information provided.
10201928	JHLRD78852C	No information related to this allegation were found within Honda in-house data, such as CRMS, WARRANTY, or TECHLINE. Therefore, without confirming the actual failed parts, we cannot determine the cause with only limited information provided.
10398695	SHSRD68443U	Even though the customer contacted American Honda to complain, with only the limited information provided, we cannot determine the cause without confirming the actual failed parts.
10398813	N/A	No information related to this allegation were found within Honda in-house data, such as CRMS, WARRANTY, or TECHLINE. Therefore, without confirming the actual failed parts, we cannot determine the cause with only limited information provided.
10399110	JHLRD78822C	No information related to this allegation were found within Honda in-house data, such as CRMS, WARRANTY, or TECHLINE. Therefore, without confirming the actual failed parts, we cannot determine the cause with only limited information provided.
10268919	SHSRD78844U	Even though the customer contacted American Honda to complain, with only the limited information provided, we cannot determine the cause without confirming the actual failed parts.
10401121	JHLRD77462C	Even though the customer contacted American Honda to complain, with only the limited information provided, we cannot determine the cause without confirming the

		actual failed parts.
10402328	SHSRD77804U	Even though the customer contacted American Honda to complain, with only the limited information provided, we cannot determine the cause without confirming the actual failed parts.
10399988	1HGEM21942L	Even though the customer contacted American Honda to complain, with only the limited information provided, we cannot determine the cause without confirming the actual failed parts.
10395219	5J6YH18776L	Even though the customer contacted American Honda to complain, with only the limited information provided, we cannot determine the cause without confirming the actual failed parts.
10393615	1HGEM21531L	Even though the customer contacted American Honda to complain, with only the limited information provided, we cannot determine the cause without confirming the actual failed parts.
10370364	1HGEM21923L	No information related to this allegation were found within Honda in-house data, such as CRMS, WARRANTY, or TECHLINE. Therefore, without confirming the actual failed parts, we cannot determine the cause with only limited information provided.
10365250	2HGES16582H	Even though the customer contacted American Honda to complain, with only the limited information provided, we cannot determine the cause without confirming the actual failed parts.
10361190	SHHEP335X2U	Even though the customer contacted American Honda to complain, with only the limited information provided, we cannot determine the cause without confirming the actual failed parts.
10355306	1HGES15201L	Even though the customer contacted American Honda to complain, with only the limited information provided, we cannot determine the cause without confirming the actual failed parts.
10347420	1HGEM22961L	Even though the customer contacted American Honda to complain, with only the limited information provided, we cannot determine the cause without confirming the actual failed parts.
10342507	1HGEM22023L	Even though the customer contacted American Honda to complain, with only the limited information provided, we cannot determine the cause without confirming the actual failed parts.
10331107	2HGES15231H	Even though the customer contacted American Honda to complain, with only the

		limited information provided, we cannot determine the cause without confirming the actual failed parts.
10325152	1HGES15531	Even though the customer contacted American Honda to complain, with only the limited information provided, we cannot determine the cause without confirming the actual failed parts.
10321231	5FNYF18575B	Even though the customer contacted American Honda to complain, with only the limited information provided, we cannot determine the cause without confirming the actual failed parts.
10315219	1HGEM22502	Even though the customer contacted American Honda to complain, with only the limited information provided, we cannot determine the cause without confirming the actual failed parts.
10281713	1HGEM21902	Even though the customer contacted American Honda to complain, with only the limited information provided, we cannot determine the cause without confirming the actual failed parts.
10276863	2HKYF18543H	Even though the customer contacted American Honda to complain, with only the limited information provided, we cannot determine the cause without confirming the actual failed parts.
10267537	JHMES16541S	This vehicle was subject to a recall for this concern. Therefore, it is expected that the cause of the alleged defect should be the same as that of the recalled issue. However, without confirming the actual failed parts, we cannot determine the cause.
10266363	1HGEM215X1L	Even though the customer contacted American Honda to complain, with only the limited information provided, we cannot determine the cause without confirming the actual failed parts.
10251832	2HGES16532H	Even though the customer contacted American Honda to complain, with only the limited information provided, we cannot determine the cause without confirming the actual failed parts.
10245445	SHHEP33592U	Even though the customer contacted American Honda to complain, with only the limited information provided, we cannot determine the cause without confirming the actual failed parts.
10242384	SHHEP33522U	Even though the customer contacted American Honda to complain, with only the limited information provided, we cannot determine the cause without confirming the actual failed parts.

10229307	1HGEM22902L	[REDACTED]	Even though the customer contacted American Honda to complain, with only the limited information provided, we cannot determine the cause without confirming the actual failed parts.
10216577	SHHEP33552U	[REDACTED]	Even though the customer contacted American Honda to complain, with only the limited information provided, we cannot determine the cause without confirming the actual failed parts.
10212620	N/A	[REDACTED]	Even though the customer contacted American Honda to complain, with only the limited information provided, we cannot determine the cause without confirming the actual failed parts.
10208187	1HGEM22572L	[REDACTED]	Even though the customer contacted American Honda to complain, with only the limited information provided, we cannot determine the cause without confirming the actual failed parts.
10204321	SHHEP33592U	[REDACTED]	No information related to this allegation were found within Honda in-house data, such as CRMS, WARRANTY, or TECHLINE. Therefore, without confirming the actual failed parts, we cannot determine the cause with only limited information provided.
10203186	1HGES26791L	[REDACTED]	Even though the customer contacted American Honda to complain, with only the limited information provided, we cannot determine the cause without confirming the actual failed parts.
10180618	1HGEM22982L	[REDACTED]	Even though the customer contacted American Honda to complain, with only the limited information provided, we cannot determine the cause without confirming the actual failed parts.
10169834	SHHEP335X2U	[REDACTED]	Even though the customer contacted American Honda to complain, with only the limited information provided, we cannot determine the cause without confirming the actual failed parts.
10159865	2HGES16541H	[REDACTED]	Even though the customer contacted American Honda to complain, with only the limited information provided, we cannot determine the cause without confirming the actual failed parts.
10156307	2HGES15531H	[REDACTED]	Even though the customer contacted American Honda to complain, with only the limited information provided, we cannot determine the cause without confirming the actual failed parts.
10111768	2HGES26762H	[REDACTED]	Even though the customer contacted American Honda to complain, with only the limited information provided, we cannot

		determine the cause without confirming the actual failed parts.
10109043	1HGES16522L [REDACTED]	Even though the customer contacted American Honda to complain, with only the limited information provided, we cannot determine the cause without confirming the actual failed parts.
10234095	2HKYF18433H [REDACTED]	Even though the customer contacted American Honda to complain, with only the limited information provided, we cannot determine the cause without confirming the actual failed parts.
10299059	1HGEM219X2L [REDACTED]	Even though the customer contacted American Honda to complain, with only the limited information provided, we cannot determine the cause without confirming the actual failed parts.
10312202	2HKYF18523H [REDACTED]	Even though the customer contacted American Honda to complain, with only the limited information provided, we cannot determine the cause without confirming the actual failed parts.
10402804	JHLRD78432C [REDACTED]	No information related to this allegation were found within Honda in-house data, such as CRMS, WARRANTY, or TECHLINE. Therefore, without confirming the actual failed parts, we cannot determine the cause with only limited information provided.
10403641	SHSRD78844L [REDACTED]	Even though the customer contacted American Honda to complain, with only the limited information provided, we cannot determine the cause without confirming the actual failed parts.
10398693	SHSRD78846L [REDACTED]	Even though the customer contacted American Honda to complain, with only the limited information provided, we cannot determine the cause without confirming the actual failed parts.
10398476	JHLRD785X5C [REDACTED]	No information related to this allegation were found within Honda in-house data, such as CRMS, WARRANTY, or TECHLINE. Therefore, without confirming the actual failed parts, we cannot determine the cause with only limited information provided.
10396338	N/A	No information related to this allegation were found within Honda in-house data, such as CRMS, WARRANTY, or TECHLINE. Therefore, without confirming the actual failed parts, we cannot determine the cause with only limited information provided.
10383134	JHLRD77886C [REDACTED]	No information related to this allegation were found within Honda in-house data, such as CRMS, WARRANTY, or TECHLINE. Therefore, without confirming the actual



		failed parts, we cannot determine the cause with only limited information provided.
10382525	N/A	Even though the customer contacted American Honda to complain, with only the limited information provided, we cannot determine the cause without confirming the actual failed parts.
10374918	JHLRD78506C [REDACTED]	No information related to this allegation were found within Honda in-house data, such as CRMS, WARRANTY, or TECHLINE. Therefore, without confirming the actual failed parts, we cannot determine the cause with only limited information provided.
10369648	SHSRD78806U [REDACTED]	No information related to this allegation were found within Honda in-house data, such as CRMS, WARRANTY, or TECHLINE. Therefore, without confirming the actual failed parts, we cannot determine the cause with only limited information provided.
10336360	N/A	No information related to this allegation were found within Honda in-house data, such as CRMS, WARRANTY, or TECHLINE. Therefore, without confirming the actual failed parts, we cannot determine the cause with only limited information provided.
10330517	JHLRD788X6L [REDACTED]	No information related to this allegation were found within Honda in-house data, such as CRMS, WARRANTY, or TECHLINE. Therefore, without confirming the actual failed parts, we cannot determine the cause with only limited information provided.
10325482	N/A	No information related to this allegation were found within Honda in-house data, such as CRMS, WARRANTY, or TECHLINE. Therefore, without confirming the actual failed parts, we cannot determine the cause with only limited information provided.
10319876	N/A	No information related to this allegation were found within Honda in-house data, such as CRMS, WARRANTY, or TECHLINE. Therefore, without confirming the actual failed parts, we cannot determine the cause with only limited information provided.
10312888	N/A	No information related to this allegation were found within Honda in-house data, such as CRMS, WARRANTY, or TECHLINE. Therefore, without confirming the actual failed parts, we cannot determine the cause with only limited information provided.
10296481	SHSRD78505U [REDACTED]	No information related to this allegation were found within Honda in-house data, such as CRMS, WARRANTY, or TECHLINE. Therefore, without confirming the actual failed parts, we cannot determine the cause

		with only limited information provided.
10295823	N/A	No information related to this allegation were found within Honda in-house data, such as CRMS, WARRANTY, or TECHLINE. Therefore, without confirming the actual failed parts, we cannot determine the cause with only limited information provided.
10294224	JHLRD78806C [REDACTED]	No information related to this allegation were found within Honda in-house data, such as CRMS, WARRANTY, or TECHLINE. Therefore, without confirming the actual failed parts, we cannot determine the cause with only limited information provided.
10290531	SHSRD78996L [REDACTED]	No information related to this allegation were found within Honda in-house data, such as CRMS, WARRANTY, or TECHLINE. Therefore, without confirming the actual failed parts, we cannot determine the cause with only limited information provided.
10231634	JHLRD68856C [REDACTED]	No information related to this allegation were found within Honda in-house data, such as CRMS, WARRANTY, or TECHLINE. Therefore, without confirming the actual failed parts, we cannot determine the cause with only limited information provided.
10216474	N/A	No information related to this allegation were found within Honda in-house data, such as CRMS, WARRANTY, or TECHLINE. Therefore, without confirming the actual failed parts, we cannot determine the cause with only limited information provided.
10221406	JHLRD78965C [REDACTED]	Even though the customer contacted American Honda to complain, with only the limited information provided, we cannot determine the cause without confirming the actual failed parts.

Sincerely,

AMERICAN HONDA MOTOR CO., INC.

*Jay Joseph / JWA*

Jay Joseph  
Senior Manager  
Product Regulatory Office

JWJ:nis

Attachments