



U.S. Department  
of Transportation

**National Highway  
Traffic Safety  
Administration**

## ODI RESUME

**Investigation:** EQ 12-010  
**Prompted by:** 12V-062, 10V-055, 08V-244, 06V-069  
**Date Opened:** 09/28/2012 **Date Closed:** 12/31/2012  
**Investigator:** Alexander Ansley  
**Approver:** Jennifer Timian  
**Subject:** Stabilus Rear Liftgate Struts Failing

### MANUFACTURER & PRODUCT INFORMATION

**Manufacturer:** Stabilus, Honda (American Honda Motor Co.), Ford Motor Company, TOYOTA MOTOR CORPORATION  
**Products:** Multiple MFR make/models between 2004-2009  
**Population:** 276,473  
**Problem Description:** Stabilus gas struts, installed on the rear liftgates of multiple manufacturers' vehicles, may fail causing unexpected closure of the rear liftgate.

### ACTION / SUMMARY INFORMATION

**Action:** Close EQ

**Summary:**  
Please see the attached closing resume summary. It has been attached to this document as a PDF.

## **EQ12-010 Closing Resume**

On February 16, 2012, American Honda Motor Company (Honda) notified the NHTSA that it had decided a defect exists in certain model year 2008 through 2009 Odyssey vehicles. Gas-filled struts that help to raise and support the liftgate of vehicles equipped with a power liftgate system may be prone to early life failures due to a manufacturing flaw. The flaw can result in a leak of the pressurized gas, leading to reduced strut performance. Struts with diminished performance can lead to unexpected closure, increasing the risk of personal injury. Stabilus was identified as the manufacturer of these gas-filled struts. This matter was assigned recall number 12V-062.

In reviewing past records, RMD discovered similar recalls conducted by Toyota, Ford, and Honda between 2006 and 2010. On February 18, 2010, Honda notified the NHTSA of the same rear liftgate gas strut issue in its 2005 Odyssey vehicles. This issue was given recall number 10V-055. On May 30, 2008, Toyota Motor Corporation (Toyota) notified the NHTSA of the same issue found in its 2004 through 2006 Sienna vehicles. This issue was given recall number 08V-244. On March 6, 2006, Ford Motor Company (Ford) notified the NHTSA of the same issue found in its 2005 through 2006 Freestar and Mercury Monterey vehicles. This issue was given recall number 06V-069. These three recalls did not originally identify the supplier of the gas struts; however, all three manufacturers have since confirmed that Stabilus supplied the equipment at issue in each recall.

On October 1, 2012, the Recall Management Division (RMD) mailed an information request (IR) letter to Stabilus. RMD requested a list of all customers that purchased the same or similar gas-filled struts as well as list of customers that purchased any struts that were sold in the replacement market.

On October 19, 2012, Stabilus submitted a written response to NHTSA's Office of the Chief Counsel (NCC) under a request for confidential treatment. As of the close of this Equipment Query (EQ), Stabilus' request for confidential treatment has not yet been granted nor denied. As such, Stabilus' attachments marked "Confidential" will not be posted publically until/unless NCC denies Stabilus' request for confidentiality of those documents.

In its response, Stabilus noted that it did not agree that the struts contained a safety related defect. Stabilus identified language in Honda's 10V-055 report and Toyota's 08V-244 report supplementing its disagreement that the defect related to safety. In its report, Honda stated, "Though Honda recognizes the problem is not a safety defect, Honda has decided to conduct a product update campaign to replace those struts that may fail prematurely..." and Toyota stated, "Although Toyota is willing to identify this campaign as a safety recall in the owner communication about the campaign, Toyota has not determined that the condition described above is a "safety-related defect" within the meaning of the federal vehicle safety laws."

Stabilus maintained that “all struts will eventually and gradually lose pressure” and the true fault lies with ineffective “Catch a falling gate” power liftgate software that may allow a failed strut to fall in an uncontrolled manner. Stabilus noted that Ford’s gas-strut recall (06V-069) did not involve the replacement of Stabilus struts. The remedy for that recall included only a software modification to the power liftgate control module in order to prevent the liftgate from falling freely without warning. As to the list of purchasers that RMD requested, Stabilus noted that it “supplies struts for nearly all motor vehicles produced in North America; however, Stabilus did not supply the “same” struts like the Honda Odyssey, Toyota Sienna, or Ford Freestar struts to any (other) customer as these struts were manufactured for those specific vehicles only. Each vehicle utilized a custom strut comprised of a unique combination of length, diameter, force and internal components. These parameters are dependent on the vehicle structure and customer requirements and differ from vehicle to vehicle.”

However, Stabilus considers “similarly-affected” struts to be those sharing the common design trait of a small diameter rod with a relatively large diameter tube, and used together with a power liftgate option. As the strut used in the Honda Odyssey was the longest length ever used by Stabilus in an automotive application, Stabilus “can therefore confidently confirm that there are no struts similar to the Odyssey strut which were sold to (other) customers.”

As to the struts recalled on the Ford Freestar and Toyota Sienna, similar strut combinations were also installed on six (6) other vehicles: The MY2008 Ford Freestyle, MY2009 Taurus-X, MY2009 - Current Chevrolet Traverse, MY2008 - Current Buick Enclave, Saturn View, and GMC Acadia. However, these struts received several significant design improvements prior to installation into these additional vehicles. As such, “...it is Stabilus’ position that there are no other vehicles for which Stabilus manufactured and sold ‘similarly affected’ struts.”

RMD also queried Stabilus as to whether the same or similar struts were manufactured, sold, or distributed into the replacement market, and, if so, to provide a list of purchasers for those struts. Stabilus identified 258 Honda Odyssey struts that were sold into the replacement market without the same product improvements noted above. The aftermarket struts could have been used on manual or power liftgate applications. Stabilus estimated approximately 25 percent of those struts were used on power liftgate applications.

The purpose of this EQ was to identify any same or similar gas struts to those recalled under the various safety recalls referenced above, and that have not been campaigned. The only struts this investigation uncovered were aftermarket and then only a small number, further limited by application to power applications. Accordingly, given the small population, lack of traceability inherently associated with aftermarket sales, and limited agency resources, this investigation is closed. ODI will continue to monitor complaints for this issue and will reconsider if the circumstances warrant further action.