

December 6, 2012

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

Re: PE12-026
2003-2004 Honda Pilot, Odyssey
Ignition Interlock Failure

Dear Mr. Quandt:

In reply to your letter dated October 11, 2012, we are submitting our response regarding the allegations of ignition interlock failure in model year (MY) 2003 through 2004 Honda Pilot and Odyssey vehicles for Q1-Q4 and Q7. We will submit responses for Q5-Q6 as soon as possible.

We are providing response for Q1-Q7 only because we have notified your office that Honda will be conducting a safety recall campaign for the investigation subject vehicles, as well as model year (MY) 2003-2006 Acura MDX.

1. State, by model and model year, the number of subject vehicles Honda has manufactured for sale or lease 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. Transmission type (automatic or manual);
 - f. Date warranty coverage commenced; and
 - g. The State in the United States where the vehicle was originally sold or leased (or delivered for sale or lease).

Provide the table in Microsoft Access 2010 or 2007, or a compatible format, entitled "PRODUCTION DATA." See Enclosure 1, Data Collection Disc, for a pre-formatted table which provides further details regarding this submission.

Response:

The data elements "a" through "g" are provided in the file titled "PRODUCTION DATA" on the enclosed CD. We did not provide any data for element "e" as all subject vehicles are equipped with automatic transmission. There are separate tables for each model.

Model	Model Year	# Manufactured for Sales/Lease
Pilot	2003	122,996

	2004	135,932
Odyssey	2003	165,848
	2004	152,386

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, including those from fleet operators;
- b. Field reports, including dealer field reports;
- c. Reports involving a 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 a possible defect in a subject vehicle, property damage claims, consumer complaints, or field reports;
- d. Property damage claims;
- e. Third-party arbitration proceedings where Honda is or was a party to the arbitration; and
- f. Lawsuits, both pending and closed, in which Honda is or was a defendant or codefendant.

For subparts "a" through "d" state the total number of each item (e.g., consumer complaints, field reports, 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" through "f" 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 "e" and "f" identify the parties to the action, as well as the caption, court, docket

Response:

The total number of reports for items "a" through "f" are stated in the table below. Question 2.c. requests crash, injury and fatality reports "involving a death or injury" however per verbal clarification by NHTSA ODI we are including all crash and property damage reports regardless if there is an affiliated death or injury claim.

See Attachment #Q2 on enclosed CD for summary description for items "c" through "f". Honda did not identify any relevant reports for items "e" through "f".

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

Model	Model Year	A Owner/ Fleet Reports	B Field/ Dealer Reports	C-1 Crash Reports	C-2 Injury Reports	C-3 Fatality Reports	D Property Damage	E Third-Party Arbitration	F Lawsuits
Pilot	2003	167	8	8	0	0	7	0	0
	2004	76	6	9	1	0	5	0	0
Odyssey	2003	92	7	5	0	0	6	0	0
	2004	28	2	6	1	0	6	0	0

Source(s): Customer Relations, Tech Line, Field Reports, Claims and Lawsuits.
As of: Sept. 30, 2012

3. Separately, for each item (complaint, report, claim, notice, or matter) within the scope of your response to Request No. 2, state the following information:

- a. Honda's file number or other identifier used;
- b. The category of the item, as identified in Request No. 2 (i.e., consumer complaint, field report, etc.);
- c. Vehicle owner or fleet name (and fleet contact person), address, and telephone number;
- d. Vehicle's VIN;
- e. Vehicle's make, model and model year;
- f. Vehicle's mileage at time of incident;
- g. Incident date;
- h. Report or claim date;
- i. Whether a rollaway is alleged;
- j. Whether a crash is alleged;
- k. Whether property damage is alleged;
- l. Number of alleged injuries, if any; and
- m. Number of alleged fatalities, if any.

Provide this information in Microsoft Access 2010, 2007, or a compatible format, entitled "REQUEST NUMBER TWO DATA." See Enclosure 1, Data Collection Disc, for a pre-formatted table which provides further details regarding this submission.

Response

The data elements "a" through "m" are provided in the file titled "REQUEST NUMBER TWO DATA" on the enclosed CD. We included an additional column indicating which of the following categories the complaint or report falls into: 1) Remove key, not in PARK; 2) Key hard to remove or is stuck; 3) Can't turn key; 4) Vehicle rollaway, key removed unknown and 5) Gear selector shifted from Park when the ignition key is not in the ignition.

Source(s): Customer Relations, Tech Line, Field Reports, Claims and Lawsuits.
As of: Sept. 30, 2012

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, field reports, etc.) and describe the method Honda used for organizing the documents.

Response:

See Attachment #Q4 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 sub-categorized: 1) Remove key, not in PARK; 2) Key hard to remove or is stuck; 3) Can't turn key; 4) Vehicle rollaway, key removed unknown and 5) Gear selector shifted from Park when the ignition key is not in the ignition. The documents in each sub-category 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: Sept. 30, 2012

5. State, by model and model year, a total count for all of the following categories of claims, collectively, that have been paid by Honda to date that relate to, or may relate to, the alleged defect in the subject vehicles: warranty claims; extended warranty claims; claims for good will services that were provided; field, zone, 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 or fleet name (and fleet contact person) and telephone number;
- c. VIN;
- d. Repair date;
- e. Vehicle mileage at time of repair;
- f. Repairing dealer's or facility's name, telephone number, city and state or ZIP code;
- g. Labor operation number;
- h. Problem code;
- i. Replacement part number(s) and description(s);
- j. Concern stated by customer;
- k. Cause and Correction, as stated by dealer/technician; and
- l. Comment, if any, by dealer/technician relating to claim and/or repair.

Provide this information in Microsoft Access 2010, 2007, or a compatible format, entitled "WARRANTY DATA." See Enclosure 1, Data Collection Disc, for a pre-formatted table which provides further details regarding this submission.

Response:

To be submitted

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, by make and model year, 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) that Honda offered for the subject vehicles and state by option, model, and model year, the number of vehicles that are covered under each such extended warranty.

Response:

To be submitted

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 dealers, regional or zone offices, field offices, fleet purchasers, 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 for the following "Honda Service News, Dec. 2005, Can't turn ignition switch? Check for locked steering."

Due to the decision by Honda Motor Company to conduct a safety recall for this concern, we will submit a defect determination notification (573 report) and associated recall documentation to NHTSA ODI separately.

Sincerely,

AMERICAN HONDA MOTOR CO., INC.

A handwritten signature in blue ink, appearing to read "Jay Joseph", with a long horizontal stroke extending to the right.

Jay Joseph
Senior Manager
Product Regulatory Office

JWJ:nis

Attachments