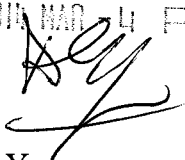


OFFICE OF DEFECTS &
INVESTIGATION

2014 MAR 04 P 3:00



March 3, 2014



Mr. Scott Yon
Chief, Vehicle Integrity Division
Office of Defects Investigation
National Highway Traffic Safety Administration
1200 New Jersey Avenue, SE
Washington, D.C. 20590

RE: NVS-212mjl, RQ13-004

Dear Mr. Yon:

On behalf of Hyundai Motor Company (Hyundai or HMC), Hyundai America Technical Center, Inc. (HATCI) hereby submits this letter in response to the Recall Query information request. HATCI is an organization independent of both HMC and Hyundai Motor America, Inc. ("HMA"), but it has been designated by those organizations to act as their communication liaison with the NHTSA. This response is submitted to NHTSA by HATCI in that limited role. That is, HATCI is providing the information and documents which are in Hyundai's possession, custody or control and were collected by Hyundai for transmission to NHTSA.

As you know, NHTSA opened a preliminary evaluation following an incident in which a metal bracket had been dislodged following a side impact crash in a MY 2012 Elantra. Hyundai conducted over 35 tests with varying levels of attaching the support bracket to the headliner fabric. The testing demonstrated that the attachment of the bracket to the headliner is sufficiently robust to withstand side airbag deployment forces. Nonetheless, Hyundai agreed to add an additional measure to ensure further attachment support and announced a recall to add adhesive tape to the support bracket. As reflected in prior submissions, metal support brackets are not unique to Hyundai vehicles. Many other manufacturers include such brackets, with some vehicles utilizing adhesive tape and others not.

As noted in the response to the EA, the design and construction of each metal support bracket depends on the specific construction of the headliner and the overall vehicle design. The decision whether or not to include adhesive tape depends on the particular dimensions and location of each support. In the case of the subject vehicles, no adhesive tape is necessary to ensure that the bracket stays attached during a side airbag deployment. Hyundai has conducted thirteen additional deployment tests on the Elantra Touring demonstrating the strength of the attachment of the support bracket to the headliner without the need for any additional adhesive tape. The testing further showed the adhesion to be sufficient without hot melt adhesive.

Hyundai-Kia America Technical Center Inc.
6800 Geddes Road, Superior Township, MI 48198
TEL: 734-337-9499 FAX: 734-483-5919
www.hatci.com

HATCI is an authorized representative of both Hyundai Motor Company and Kia Motors Corporation; which are separate and distinct automotive manufacturers.

Hyundai-Kia America Technical Center, Inc.

We are currently working with the agency towards testing additional headliners in March. We believe the testing will confirm Hyundai's test results and will further support closing this Recall Query. We look forward to continuing to work with the agency to conclude this investigation.

Preliminary Objections

Prior to responding to the Recall Query, Hyundai notes that it considers the definition of "document" in the Information Request to be unreasonably broad, vague, and ambiguous, and to exceed the scope of records that might reasonably be expected to bear relevant information.

Hyundai's response to this Recall Query was based on searches of locations where documents determined to be responsive to the information request would normally be found and in consultation with current personnel knowledgeable about the information requested. As a result, the scope of this search did not include, nor could it reasonably include, "all of its past and present officers and employees, whether assigned to principal offices or any field or other location, including all divisions, subsidiaries (whether or not incorporated) and affiliated enterprises and all of headquarters, regional, zone and other offices and their employees, and all agents, contractors, consultants, attorneys and law firms and other persons engaged directly or indirectly (e.g., employee of a consultant) by or under the control of Hyundai (including all business units and persons previously referred to), who are or, in or after January 1, 2005, were involved in any way with any of the following related to the alleged defect in the subject vehicles:

- a. Design, engineering, analysis, modification or production (e.g. quality control);
- b. Testing, assessment or evaluation;
- c. Consideration, or recognition of potential or actual defects, reporting, record-keeping and information management (e.g., complaints, field reports, warranty information, part sales), analysis, claims, or lawsuits; or
- d. Communication to, from or intended for zone representatives, fleets, dealers, or other field locations, including but not limited people who have the capacity to obtain information from dealers."

Hyundai intends to work with the agency to provide translations as quickly as possible. As in the past, Hyundai may provide informal translations of the most relevant documents to enable the company to meet the agency's timeframe while continuing to work on obtaining more complete and/or more formal translations. Hyundai will work with ODI in the future to ensure an agreement is reached as to process.

Hyundai construes the Recall Query as pertaining to vehicles manufactured for sale in the United States and its territories.

Hyundai-Kia America Technical Center, Inc.

Responses to Information Requests

Request 1

State, by model and model year, the number of the subject vehicles that Hyundai-Kia has manufactured for sale or lease in the United States. Separately, for each subject vehicle manufactured to date by Hyundai-Kia, state the following:

- a. Vehicle identification number (VIN);
- b. Make;
- c. Model;
- d. Model Year;
- e. Date of manufacture;
- 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 a compatible format, entitled "PRODUCTION DATA."

Response to Request 1

Model/Model Year	2007	2008	2009	2010	2011	2012	2013
Elantra Touring	-	-	8,090	15,019	13,999	14,854	-
Veracruz (w/sunroof)	8,526	12,515	1,833	5,012	7,072	7,199	-

Refer to ATTACHMENT "RQ13-004 PRODUCTION DATA.accdb" for requested information. The MY 2007-2008 Elantra Touring was not sold in the United States, and the model was discontinued after MY 2012. The Veracruz was sold in the United States for MY 2007-2012. The MY 2013 Veracruz is sold outside of the United States.

Source: Hyundai Motor America
Information as of January 27, 2014

Request 2

Separately, by model, state the number of each of the following, received by Hyundai-Kia, or of which Hyundai-Kia 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;
- d. Property damage claims;

Hyundai-Kia America Technical Center, Inc.

- e. Third-party arbitration proceedings where Hyundai-Kia is or was a party to the arbitration; and
- f. Lawsuits, both pending and closed, in which Hyundai-Kia is or was a defendant or codefendant.

For subparts “a” through “f,” 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 Hyundai-Kia’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 number, and date on which the complaint or other document initiating the action was filed.

Response to Request 2

- a. Consumer complaints, including those from fleet operators:

None.

- b. Field reports, including dealer field reports;

None.

- c. Reports involving an injury, or fatality;

None.

- d. Property damage claims;

None.

- e. Third-party arbitration proceedings where Hyundai is or was a party to the arbitration;

None.

- f. Lawsuits, both pending and closed, in which Hyundai is or was a defendant or codefendant.

Hyundai-Kia America Technical Center, Inc.

None.

Source: Hyundai Motor America
Information as of January 30, 2014

Request 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. Hyundai-Kia'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 there was an allegation or evidence of stiffener detachment/separation;
- j. Whether property damage is alleged;
- k. Number of alleged injuries, if any;
- l. Number of alleged fatalities, if any; and
- m. Summary of the problem with the deployment of the side curtain air bag, if applicable.

Provide this information in Microsoft Access 2010, or a compatible format, entitled "REQUEST NUMBER TWO DATA."

Response to Request 3

Hyundai has received no consumer complaints, field reports, reports involving an injury or fatality, property damage claims, third-party arbitration claims, or lawsuits responsive to Request No. 2.

Source: Hyundai Motor America
Information as of January 30, 2014

Request 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 Hyundai-Kia used for organizing the documents.

Hyundai-Kia America Technical Center, Inc.

Response to Request 4

Hyundai has received no consumer complaints, field reports, reports involving an injury or fatality, property damage claims, third-party arbitration claims, or lawsuits responsive to Request No. 2.

Source: Hyundai Motor America
Information as of January 30, 2014

Request 5

State, by model and model year, a total count for all of the following categories of claims, collectively, that have been paid by Hyundai-Kia to date that relate to, or may relate to, the alleged defect in the subject vehicles, including all claims for repairs of the subject components that relate to, or may relate to, a detachment, separation or looseness of the stiffener in the headliner assembly without a side curtain air bag deployment (e.g., owner reporting a rattling sound from headliner): 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. Hyundai-Kia's claim number;
- b. Vehicle owner or fleet name (and fleet contact person) and telephone number;
- c. Vehicle's VIN;
- d. Vehicle's make, model and model year;
- e. Repair date;
- f. Vehicle mileage at time of repair;
- g. Repairing dealer's or facility's name, telephone number, city and state or ZIP code;
- h. Labor operation number;
- i. Problem code;
- j. Replacement part number(s) and description(s);
- k. Concern stated by customer; and
- l. Comment, if any, by dealer/technician relating to claim and/or repair.

Provide this information in Microsoft Access 2010, or a compatible format, entitled "WARRANTY DATA."

Response to Request 5

Hyundai has received no claims or other reports suggesting looseness, separation or detachment of the metal bracket in the subject vehicles. As with all vehicles, Hyundai does receive reports of rattles or noise within the area of the headliner. The total count for claims that have been paid by Hyundai to date which are responsive to the "owner reporting a rattling sound from the headliner" example described in Request 5 are as follows:

Hyundai-Kia America Technical Center, Inc.

- 1) 2009 Hyundai Elantra Touring vehicles: 8.
- 2) 2010 Hyundai Elantra Touring vehicles: 16.
- 3) 2011 Hyundai Elantra Touring vehicles: 6.
- 4) 2012 Hyundai Elantra Touring vehicles: 13.
- 5) 2007 Hyundai Veracruz vehicles with optional sunroof: 2.
- 6) 2008 Hyundai Veracruz vehicles with optional sunroof: 3.
- 7) 2009 Hyundai Veracruz vehicles with optional sunroof: 3.
- 8) 2010 Hyundai Veracruz vehicles with optional sunroof: 4.
- 9) 2011 Hyundai Veracruz vehicles with optional sunroof: 9.
- 10) 2012 Hyundai Veracruz vehicles with optional sunroof: 9.

Although many of the claims are described in general terms, a review shows they relate primarily to connections around the sun visor or Bluetooth device and looseness in the energy absorbing plastic. The claims do not suggest a trend of loose or detached support brackets.

There are no warranty claims or repairs made in accordance with a procedure specified in a technical service bulletin or customer satisfaction campaign.

See ATTACHMENT "RQ13-004 WARRANTY DATA.accdb" for additional requested information.

Source: Hyundai Motor America
Information as of February 03, 2014

Request 6

Describe in detail the search criteria used by Hyundai-Kia 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 lists of all labor operations, labor operation descriptions, problem codes, and problem code descriptions applicable to the alleged defect in the subject vehicles. State, by model and model year, the terms of the new vehicle warranty coverage offered by Hyundai-Kia 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 Hyundai-Kia 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 Request 6

The claims were identified by searching for all subject vehicle warranty claims containing information for the Headliner Operation Codes or Headliner Part Numbers. The claims were then manually reviewed for customer or technician comments responsive to the parameters described in Request 5.

See ATTACHMENT "RQ13-004 WARRANTY CODES.xlsx" for a list of all labor operations,

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labor operation descriptions, problem codes, and problem code descriptions applicable to the claims provided in response to Request No. 5.

The Hyundai New Vehicle Limited Warranty period is limited to 60 months from the date of original retail delivery or date of first use, or 60,000 miles, whichever occurs first. The headliner is covered by the Hyundai New Vehicle Limited Warranty.

Extended warranty option plans offered for the subject vehicles include Hyundai Protection Plan Silver, Gold, Gold Plus, and Platinum plans. See ATTACHMENT "Extended Service Plan Description.pdf" for a description of the available extended service plans.

Model	Model Year	Coverage			
		Silver	Gold	Gold Plus	Platinum
Elantra Touring	2009	19	20	52	350
Elantra Touring	2010	20	62	169	880
Elantra Touring	2011	20	83	153	962
Elantra Touring	2012	24	107	171	1236
Veracruz	2007	9	16	40	364
Veracruz	2008	13	34	65	703
Veracruz	2009	2	4	11	122
Veracruz	2010	2	19	28	431
Veracruz	2011	7	21	54	649
Veracruz	2012	7	32	46	693

Source: Hyundai Motor America
Information as of February 13, 2014

Request 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 Hyundai-Kia 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 Hyundai-Kia is planning to issue within the next 120 days.

Response to Request 7

Hyundai has identified no responsive documents.

Source: Hyundai Motor America
Information as of February 13, 2014

Hyundai-Kia America Technical Center, Inc.

Request 8

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, Hyundai-Kia. This includes, but is not limited to, any and all actions by the subject component manufacturer relating to the alleged defect. 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. If an action is not complete, provide a detailed schedule for the work to be done, tentative findings and/or conclusions, and provide an update within 10 days of completion of the action.

Response to Request 8

Following the receipt of RQ13-004, Hyundai Motor Company’s Crash Performance Development Team conducted 12 additional side curtain air bag deployment tests for the Elantra Touring in an attempt to duplicate the alleged defect. Varying levels of support bracket attachment were evaluated, and the hot melt adhesive was eliminated during several of the tests. The support bracket did not dislodge during any of the testing. Refer to Attachment “Response to Request 8” folder for additional testing details.

The test results show that the process of adhering the bracket to the fabric with the spray adhesive and pressing the bracket and headliner together provides robust adhesion capable of withstanding the deployment forces. The use of hot melt in the Elantra Touring provides an additional level of support, but as the test results show, is not necessary to assure adhesion. The testing confirms that in neither case is the further addition of adhesive tape necessary.

Source: Hyundai Motor Company
Information as of February 12, 2014

Request 9.

For each model of the subject vehicles, describe in detail all modifications or changes made by or on behalf of Hyundai-Kia (e.g., by a supplier) in the design, material composition,

Hyundai-Kia America Technical Center, Inc.

manufacture, assembly, quality control, supply, or installation of the subject component in the subject vehicles, from the start of production to the end of production of the subject vehicles, which relate to, or may relate to, the alleged defect in the subject vehicles. Your response must include, but is not limited to, any modifications or changes in the dimensions of the metal stiffener, the process used to attach the stiffener to the headliner, the process used to apply the spray adhesive or the hot-melt glue, whether or not the hot-melt glue was applied to the ends of the metal stiffener, and/or the quantity of the holt-melt glue used. For each such modification or change, separately, by model, 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 number(s) (engineering and service) of the original component;
- e. The part number(s) (engineering and service) 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 Hyundai-Kia is aware of which may be incorporated into vehicle production within the next 120 days.

Response to Request 9

Attachment "Response to Request 9" containing Engineering Change Orders has been provided to the Office of Chief Counsel with a request for treatment as Confidential Business Information.

The Engineering Orders reflect all changes made to the part, whether or not the vehicles were sold at the time in the United States. To avoid confusion, we note that the prior EA response also referred to changes made with regard to vehicles sold outside the United States. The MY 2007-2008 Elantra Touring was not sold in the United States and the model was discontinued after MY 2012. The Veracruz was sold in the United States for MY 2007-2012; 2013 Veracruz vehicles were sold in other markets. Adhesive tape was added to the headliner during the MY 2013 for the Veracruz vehicles. While Hyundai did not specify hot melt on the Veracruz, Hyundai has learned that the supplier initiated the addition independently.

Source: Hyundai Motor Company
Information as of February 12, 2014

Request 10

Produce copies of all specifications and requirements, including engineering drawings, for the design and manufacture of the subject components in the subject vehicles. Your response must include, but is not limited to, detailed descriptions of the requirements related to any aspect of

Hyundai-Kia America Technical Center, Inc.

attaching the metal stiffeners to the headliner assembly, such as whether or not applying adhesive strips to the ends of the stiffener, was considered, evaluated, required, requested, or suggested by or on behalf of Hyundai-Kia (e.g., by a supplier). Provide your responses separately for each model of the subject vehicles.

Response to Request 10.

Refer to attachment "Response to Request 10" folder.

Additionally, a portion of attachment "Response to Request10" containing engineering drawings relating to the subject components has been provided to the Office of Chief Counsel with a request for treatment as Confidential Business Information. Hyundai will supplement this information, if necessary.

Source: Hyundai Motor Company
Information as of February 23, 2014

Request 11

Produce copies of all documents related to the development, validation, testing, and analysis of the subject components in the subject vehicles that have been conducted by or on behalf of Hyundai-Kia. Provide your responses separately for each model of the subject vehicles.

Response to Request 11

Attachment "Response to Request 11" containing Engineering Change Orders has been provided to the Office of Chief Counsel with a request for treatment as Confidential Business Information.

Source: Hyundai Motor Company
Information as of February 23, 2014

Request 12

Produce copies of all documents related to all side-impact crash tests of the subject vehicles that have been conducted by or on behalf of Hyundai-Kia. Provide your responses separately for each model of the subject vehicles.

Response to Request 12

Refer to Attachment "Response to Request 12" folder for certification testing relating to side impact crashes.

Source: Hyundai Motor Company
Information as of February 23, 2014

Hyundai-Kia America Technical Center, Inc.

Request 13

For each model, model year and sunroof option (e.g., no sunroof and sunroof equipped) of the subject vehicles, provide drawings of headliner assemblies that depict the configurations and dimensions of the metal stiffeners, and photographs of finished headliner assemblies, including a close-up of the front portion of the stiffener.

Response to Request 13

Refer to Attachment "Response to Request 13" folder for photographs of finished headliner assemblies, including a close-up of the front portion of the stiffener.

Additionally, a portion of attachment "Response to Request13" containing engineering drawings and documents relating to the subject components has been provided to the Office of Chief Counsel with a request for treatment as Confidential Business Information.

Source: Hyundai Motor Company
Information as of February 23, 2014

Request 14

For each model and model year of the subject vehicles, describe in detail the process used to attach the metal stiffener to the headliner including, but not limited to, the following information:

- a. Type, description, specification, manufacturer, and photographs of the tool used to apply the adhesive to the stiffener;
- b. Process for applying the spray adhesive on one side of the stiffener, and whether the process is conducted by a human operator or a robotic device;
- c. Type, description, specification, manufacturer, and photographs of the assembly fixture used to hold the headliner for the purposes of affixing the stiffener;
- d. Process for attaching the stiffener to the headliner, including how much time elapses after force application, and how much force is specified for pressing together the two components; and
- e. Process for handling and storing the spray adhesive materials, including all procedures specified by the adhesive supplier.

In addition, produce copies of all documents related to this request.

Response to Request 14

Refer to Attachment "Response to Request 14" 14a folder included with this response for information on Type, description, specification, manufacturer, and photographs of the tool used to apply the adhesive to the stiffener.

Hyundai-Kia America Technical Center, Inc.

Attachment "Response to Request 14" 14b-e folder has been provided to the Office of Chief Counsel with a request for treatment as Confidential Business Information.

We note that Hyundai's prior response indicated that the process through which hot melt glue is applied is essentially the same for all vehicles. Although that process is applied robotically in some vehicles and manually in others, the process through which hot melt glue is applied is the same.

Source: Hyundai Motor Company
Information as of February 21, 2014

Request 15

For each model and model year of the subject vehicles, describe in detail the process used to apply the hot-melt glue to the ends of the stiffener and headliner including, but not limited to, the following information:

- a. Type, description, specification, manufacturer, and photographs of the tool used to apply the hot glue to the stiffener;
- b. Process for applying the hot glue to the stiffener, and whether the process is conducted by a human operator or a robotic device; and
- c. Process for handling and storing the hot glue materials, including all procedures specified by the adhesive supplier.

In addition, produce copies of all documents related to this request.

Response to Request 15

Refer to Attachment "Response to Request 15" folder included with this response.

Source: Hyundai Motor Company
Information as of February 21, 2014

Request 16

For each model and model year of the subject vehicles, describe in detail each type of quality control check, inspection, test, or analysis performed during the manufacture and assembly of the subject components for the subject vehicles, and specifically with respect to the adhesion of the stiffener to the headliner, the application of adhesive to the stiffener, and the application of the hot-melt glue material to the headliner. For each check, test, inspection, etc., describe the types of information or data collected and the frequency they are collected at. Explain the pass-fail criteria for each check, test, inspection, etc.

Response to Request 16

Hyundai-Kia America Technical Center, Inc.

Refer to Attachment "Response to Request 16" folder included with this response.

Source: Hyundai Motor Company
Information as of February 21, 2014

Request 17.

For each model and model year of the subject vehicles, all part numbers of the subject components that have been installed on the subject vehicles as assembled by Hyundai-Kia, and the service part numbers of the subject components Hyundai-Kia designates for installation on the subject vehicles. State, by sales month, sales year and part number, the total number of subject components sold as service parts by Hyundai-Kia. Identify any kits that Hyundai-Kia has released or developed for use in service repairs to the subject components or assembly.

For each subject component part number, provide the supplier's name, address, and point of contact used by Hyundai-Kia (name, title and telephone number). Also, identify by model and model year, any other vehicles of which Hyundai-Kia is aware that contain the identical component, whether installed in production or in service, and state the applicable dates of production or service usage.

Response to Request 17.

Refer to the following for the requested information in the Attachment "Response to Request 17" folder:

- RQ13-003 Elantra Touring Headliner Part Numbers.xlsx
- RQ13-003 Elantra Touring Headliner Part Sales.xlsx
- RQ13-003 Veracruz Headliner Part Numbers.xlsx
- RQ13-003 Veracruz Headliner Part Sales.xlsx

Hyundai has not released or developed any kits for use in service repairs to the subject components or assembly.

Supplier information: NVH KOREA INC
801-5 Moonsan-ri Oeuidong-Eup kyungju,
Kyungbuk 780-766, Korea
Point of contact: Dae ho Kim (+82-10-9363-0093)

No other vehicles contain the identical components that are the subject of this inquiry.

Source: Hyundai Motor Company
Information as of February 21, 2014

Request 18.

Hyundai-Kia America Technical Center, Inc.

Produce an exemplar sample of each design version of subject components used in the subject vehicles (Elantra Touring and Veracruz).

Response to Request 18.

Initial component samples will be sent to VRTC as agreed to with ODI.

Source: Hyundai Motor America
Information as of February 26, 2014

Request 19.

Furnish Hyundai-Kia's assessment of the alleged defect in the subject vehicles, separately, by vehicle model, including:

- a. The causal or contributory factor(s);
- b. The failure mechanism(s);
- c. The failure mode(s); and
- d. The risk to motor vehicle safety that it poses.

Response to Request 19.

Hyundai believes that, with regard to both vehicles, the adhesion of the metal support bracket to the headliner is robust and sufficient to withstand an airbag deployment. Although Hyundai's specifications for the Elantra Touring included hot melt, and the Veracruz did not, the testing conducted on the Elantra Touring showed that neither adhesive tape nor hot melt is necessary to ensure adhesion during a side airbag deployment. There have been no reports of any incidents regarding either of these vehicles. Hyundai does not believe that either vehicle poses an unreasonable risk to motor vehicle safety. Hyundai looks forward to working with NHTSA to conduct further testing and to resolving this investigation.

Source: Hyundai Motor Company
Information as of February 21, 2014

Sincerely,



Robert Babcock
Director, Certification and Compliance Affairs
Hyundai-Kia America Technical Center, Inc.

Hyundai-Kia America Technical Center, Inc.

Attachments:

CD containing:

RQ13-004 PRODUCTION DATA.accdb

RQ13-004 WARRANTY DATA.accdb

RQ13-004 WARRANTY CODES.xlsx

RQ13-004_Extended Service Plan Description.pdf

Response to Request 8

(continued)

Response to Request 10

Response to Request 12

Response to Request 13

Response to Request 14

Response to Request 15

Response to Request 16

Response to Request 17

RQ13-004

HYUNDAI-KIA

3-3-2014

ATTACHMENT

EXTENDED SERVICE PLAN
DESCRIPTION

Benefits

The five plans come with the following additional benefits to keep you moving:

Rental Car Coverage Reimbursement up to \$35 per day for up to 10 days.

Towing Coverage Payment of up to \$75 in towing charges per covered mechanical breakdown.

Travel Coverage If you're more than 100 miles from home when you break down, we will pay up to \$75 per day, up to \$375 per occurrence, for food and lodging.

Fluids Coverage Replacement of necessary fluids, oils, greases, lubricants, and approved air conditioner gases that must be replaced in conjunction with a covered repair.

Improved Resale Each plan is fully transferable, making your car more appealing to potential buyers.

Financing The cost of the selected plan may be included in the financing of your vehicle.

Optional Tire Coverage For an additional fee, you can include coverage for the repair or replacement of a tire that is damaged by a road hazard such as debris on the road or potholes.*

*Not available in all states. See Service Contract for Complete Details.



Hyundai Protection Plan

When you choose the Hyundai Protection Plan that's right for you, you can purchase coverage up to an additional 100,000 miles, depending on the age and mileage of your vehicle. And if you buy protection now, you can include the cost of the plan you choose in the financing of your vehicle.

5 Coverage Levels*

- Powertrain Coverage
- + Silver Coverage
- ++ Gold Coverage
- +++ Gold Plus Coverage
- ++++ Platinum Coverage

* Coverage level availability may be limited based on the age and mileage of your vehicle.

ASK YOUR SALESPERSON OR FINANCE MANAGER FOR OUR **HYUNDAI PROTECTION PLAN.**

■ **Toll-Free Claims Service** You get fast claims service and instant authorization of covered repairs via our toll-free number. Just call 1-866-367-9040. Our toll-free number gives you instant access to a Hyundai dealer near you.

■ **National Coverage** We provide peace of mind so that with a Hyundai Protection Plan, you are covered anywhere in the U.S., its territories or possessions, or Canada.

■ **Direct Payment** You do not have to pay and wait for reimbursement of authorized repairs.



Limitations of Coverage

This information is intended to provide only an outline of the types of coverages, exclusions and limitations of the service contracts described in this brochure and should not be relied upon when purchasing a specific service contract. For exact coverages, exclusions and limitations, please review the service contract itself. **The Hyundai Protection Plan is administered by Fidelity Warranty Services, Inc. Florida License #60026. 500 Jim Moran Boulevard, Deerfield Beach, FL 33442.**

VEHICLE PROTECTION PLAN for your Hyundai.



Powertrain covers the major components on your vehicle and offers protection against many major mechanical breakdowns.

ENGINE: Engine block and cylinder heads and all internally lubricated parts including pistons, piston rings, pins and cylinder sleeves; crankshaft, pulley, main bearings, caps and bolts; connecting rods, rod bearings, caps and bolts; camshaft(s), camshaft bearings, buttons and plugs; timing gears and timing chain or belt; rocker arms, rocker arm pivots, shafts and bushings; intake and exhaust valves, springs, guides, adjusters, retainers and seats; pushrods and lifters; intake manifold; exhaust manifolds; balance shaft; water pump; fuel pump; thermostat; oil pump, cover, gears, pressure relief valve and screen; rotor housing, rotors, shims and silent shaft; all internal fasteners, nuts and bolts; turbocharger/supercharger assembly including boost valve and wastegate; seals and gaskets.

TRANSMISSION/TRANSAXLE/TRANSFER CASE:

Transmission/transaxle case and all internally lubricated parts including ring and pinion gears; oil pump, cover, gears, housing and vanes; torque converter; valve body(s); throttle valve; valve pack; governor, gear and cover; parking gear and pawl; roll pins; sprags; sprockets; chain; springs; stator and shaft; pressure regulator valve; pressure switches; solenoids; bands; automatic transmission/transaxle clutch, drums, pistons and steel plates; planetary and sun gears; servos and rings; blockers; synchronizer hubs and keys; bearings; bushings; supports and shafts; control rings; yoke; extension housing; speedometer drive gears; accumulators and rings; adjusters; all internal fasteners, nuts and bolts; shift cover and forks; separate bell housing; transfer case and all internal parts contained within the transfer case; seals and gaskets. (STANDARD TRANSMISSION CLUTCH ASSEMBLIES AND ALL COMPONENT PARTS ARE NOT COVERED.)

DRIVE AXLE: Differential/axle housing(s) and all internally lubricated parts including the axle flange; ring and pinion gear/carrier assembly; spider gears and bearings; pins; retainers; positraction clutches, plates and springs; cover; seals and gaskets.

Silver

PLUS FEATURES OF POWERTRAIN COVERAGE:

Silver offers all of the same features of Powertrain, with the following additional benefits:

STEERING: Steering gear housing and internal parts including control rings, valves, pinion shaft, pitman shaft, worm shaft and gear, sector shaft, bearings, adjusters; rack and pinion housing and internal parts including control valve, rack bellows, mounts, rack shaft and yoke, spool valve, bearings; power steering pump and internal parts including housing, reservoir, shaft and vanes; power steering pump mounting brackets; seals and gaskets.

BRAKES: Master cylinder; vacuum or hydraulic brake booster assembly; hydraulic lines, hoses and fittings; brake pedal apply pin; seals and gaskets. (ABS COMPONENTS NOT COVERED.)

AIR CONDITIONING: Condensor; compressor; evaporator; orifice/expansion; seals and gaskets.

FRONT SUSPENSION: Upper and lower control arms, shafts and bushings; struts, housing and cartridge; spindle/steering knuckle and spindle support.

ELECTRICAL: Alternator housing and all internal parts including bearings, bushings, brushes, rectifier bridge, diodes, field coil and rotor; alternator mounting bracket; voltage regulator; starter motor housing and all internal parts including bushings, brushes, field windings, starter drive and solenoid.

Gold

PLUS FEATURES OF SILVER COVERAGE:

Gold offers all of the same features of Powertrain and Silver, with the following additional benefits:

ENGINE: Oil pan; valve, timing and side covers; thermostat housing; water pump pulley; engine mounts; harmonic balancer; flex plate/flywheel and ring gear.

TRANSMISSION: Oil pan; detent cable; kickdown link; TVI/throttle cable; vacuum modulator; transmission mounts.

DRIVE AXLE: Constant velocity joints; slip joint; front wheel drive axles/half-shafts and wheel bearings; u-joints; couplings; flex disc; prop shafts; center support bearings.

STEERING: Tie rods, idler and pitman arms, center/drag link, coupling and shafts; cooler lines.

BRAKES: Compensator/proportioning valve; metering valve; calipers, piston, seal and dust boot; wheel cylinders, cups, seals, spring and dust boots; backing plate; brake adjusters; brake pedal, pedal lever and pedal pivot; parking brake cable; ABS component parts including control processor/module, pump, dump valve, wheel speed sensors, solenoids, accumulator, and pressure differential switch.

AIR CONDITIONING: Accumulator; receiver drier; automatic temperature control programmer; clutch assembly including coil, disc and pulley; control cables; cutoff switch; serpentine belt tensioner, bearing and pulley.

FRONT SUSPENSION: Wheel bearings; ball joints and bushings; kingpin and bushings; stabilizer bar, links and bushings; torsion bar, mounts and bushings; track bar, links and bushings.

ELECTRICAL: Front and rear wiper motor, transmission and linkage; power window motor; window regulators; power seat motor; steering column multi-function switch and individual switches for turn signal, headlamp, dimmer, wiper, washer and speed control; mirror motor switch; brake light switch; neutral safety switch; glove box light switch; courtesy light switch; cooling fan relay; air control solenoid; air regulator valve; I.A.C. motor; electronic ignition module; electronic instrument panel module; ignition coil; engine distributor including shaft, gear, bushings and modules; throttle position sensor; vehicle speed sensor; M.A.P. sensor; knock sensor and barometric pressure sensor.

Gold Plus

PLUS FEATURES OF GOLD COVERAGE:

Gold Plus offers all of the same features of Powertrain, Silver, and Gold, with the following additional benefits:

COOLING: Radiator, mounting brackets and coolant recovery tank; fan clutch, fan blades and motor; fan shroud; heater core; transmission cooler.

FUEL: Fuel lines; fuel pressure regulator; level sending unit; fuel injectors and seals; injection pump; ESC systems; fuel injection control components including mixture control processor, throttle body assembly, cutoff valve, fuel rail, fuel distributor, trigger contacts, cold start valve, fuel injection valve, fuel accumulator; tank; tank door latch; tank filler neck and o-ring.

AIR CONDITIONING: Compressor mounting brackets; idler pulley and bearings; air conditioning/heater blower motor.

STEERING: Steering wheel tilt and telescoping mechanism.

FRONT SUSPENSION: Coil and leaf springs, seats and bushings, leaf spring shackles; electronic level control components including pump, accumulator, lines and bags.

REAR SUSPENSION: Upper and lower control arms, shafts and bushings; upper and lower ball joints; struts, housing and cartridge; wheel bearings; spindle/steering knuckle and spindle support; coil and leaf springs, seats and bushings, leaf spring shackles; track bars, links and bushings; electronic level control components including pump, accumulator, lines, bags; stabilizer bar, links and bushings.

ELECTRICAL: Cruise control module, servo, cables and switches; instrument cluster including speedometer, odometer, tachometer and all gauges, warning indicators; burglar alarm or electronic entry systems including remote entry receiver, sender and module; door lock actuators; mirror motor; power window switch; power lock switch; rear window defogger; horn and relay; convertible top motor; sunroof motor; power antenna motor; electrical headlamp motor; power trunk/hatch release motor, switch and solenoid; power sliding door motor and switch; electronic control modules including body control module, electronic control unit, powertrain control module, transmission control module; electronic throttle control module; crank angle sensor; camshaft position sensor; throttle position motor; fuel pulse dampener; wide open throttle switch; thermo time switch; fuel pump relay; automatic temperature control sensor; ride height sensor and relay; oxygen (O2) sensor; mass air flow sensor; manifold differential pressure sensor; coolant temperature sensor; OEM radio/graphic equalizer/cassette tape player/compact disc player.

Platinum

ULTIMATE PEACE OF MIND:

In addition to offering the same features of Powertrain, Silver, Gold, and Gold Plus, Platinum expands to cover almost all assemblies of your vehicle.

Platinum Exclusions

Under Platinum Coverage, the following parts are excluded:

Brake linings, brake drums and rotors, disc brake pads, standard transmission clutch components, air bags, solar powered devices, hinges, glass, lenses, sealed beams, body parts and/or panels, trim, moldings, door handles, lock cylinders, tires, wheels, batteries, light bulbs, upholstery, paint, bright metal, freeze plugs, heater and radiator hoses, exhaust system, shock absorbers, audio, security or other systems not factory installed, work such as front-end alignment or wheel balancing, constant velocity joint boots, safety restraint systems, cellular phones, electronic transmitting devices (except for those specifically listed under silver, gold, or gold plus coverage), radar detectors, appliances, near object avoidance systems and all laser radar cruise control components, vinyl and convertible tops.

Get on your way to carefree driving experience

