

HONDA

American Honda Motor Co., Inc.
1919 Torrance Boulevard
Torrance, CA 90501-2746
Phone (310) 783-2000

Paul A. Hemmersbaugh
Chief's Counsel's Office
U.S. DEPARTMENT OF TRANSPORTATION
National Highway Traffic Safety Administration
1200 New Jersey Avenue, SE
Washington, DC 20590

**Re: EA14-002 Kia Sorento Sunroofs
Honda Response**

Dear Mr. Hemmersbaugh,

In reply to your letter dated April 14, 2016, we are submitting our response regarding allegations of panoramic sunroofs spontaneously shattering per the General Order requirements.

1. Describe the history of panoramic sunroofs in the vehicles you manufacture. Your response should include, but not be limited to, the reason(s) you decided to add panoramic sunroofs as an option, the model(s) and model year for which you first offered this option, and the timeline of the development and decision making that led to the introduction of panoramic sunroofs.

Response:

2003-2008 Honda Element

The design concept for this vehicle utilized a removable hatch at the rear of the roof to allow for loading of a long surfboard or star gazing while camping in the vehicle.

The panoramic roof was first offered on the 2003 model year (4WD only).

The concept of the panoramic roof was first proposed in July 2000. The concept was approved in April of 2001 and went into production in the fall of 2002.

2010-2013 Acura ZDX

The design concept for this vehicle was to provide customers sitting in the back seat of the vehicle with additional light and more open feeling.

The panoramic roof was first offered on the 2010 model year (all trim variations).

The concept of the panoramic roof was first proposed in February 2007. The concept was approved in December 2007 and went into production in the fall of 2009.

2016 Honda Pilot

The design concept for the exterior of the vehicle was to have continuous black from the hood to the rear bumper, while the interior concept called for an open view of the sky or cityscape for the passengers.

The panoramic roof was first offered on the 2016 model year (Elite trim only).

The concept of the panoramic roof was first proposed in February 2013. The concept was approved in November 2013 and went into production in the spring of 2015.

2. Identify and enumerate the total population of vehicles you manufactured that contain a panoramic sunroof as original equipment. Your response should be broken down by make, model, and model year.

Response:

MAKE	MODEL	MODEL YEAR	POPULATION
HONDA	ELEMENT (4WD)	2003	53,999
HONDA	ELEMENT (4WD)	2004	39,840
HONDA	ELEMENT (4WD)	2005	34,501
HONDA	ELEMENT (4WD)	2006	28,350
HONDA	ELEMENT (4WD)	2007	16,343
HONDA	ELEMENT (4WD)	2008	20,400
ACURA	ZDX	2010	3,994
ACURA	ZDX	2011	737
ACURA	ZDX	2012	1,137
ACURA	ZDX	2013	360
HONDA	PILOT (ELITE)	2016	10,998

3. For each panoramic sunroof identified in your response to Request No. 2, provide the following information:
- The name and contact information for the sunroof manufacturer;
 - The number of glass panels
 - The size of the glass panel(s) (length x width in cm)
 - The thickness of the glass panel(s) in mm
 - The standard to which the sunroof was manufactured

Response:

See attachment Q3

4. Identify by make, model, and model year, the number of incidents involving an allegation that a panoramic sunroof has spontaneously shattered, and state the number of injuries or fatalities associated with such incidents.

Response:

MAKE	MODEL	Incidents	Injuries	fatalities
HONDA	2003 ELEMENT (4WD)	0	0	0
HONDA	2004 ELEMENT (4WD)	0	0	0
HONDA	2005 ELEMENT (4WD)	0	0	0
HONDA	2006 ELEMENT (4WD)	0	0	0
HONDA	2007 ELEMENT (4WD)	2	0	0
HONDA	2008 ELEMENT (4WD)	0	0	0
ACURA	2010 ZDX	5	0	0
ACURA	2011 ZDX	0	0	0
ACURA	2012 ZDX	2	0	0
ACURA	2013 ZDX	0	0	0
HONDA	2016 PILOT (ELITE)	0	0	0

5. File a report of every incident involving an allegation that a panoramic sunroof has shattered spontaneously in a vehicle manufactured by you, of which you are aware by any means (including but not limited to consumer complaints, lawsuits, media reports). The report shall include the following information:
- a) The date on which you were first notified or learned of the incident
 - b) The name of the individual involved in the incident
 - c) The contact information for counsel representing that individual (if applicable)
 - d) The make, model, and model year of the vehicle
 - e) The vehicle identification number (VIN)
 - f) The date, location and description of the incident (including whether the vehicle was stationary or in motion when the incident occurred)
 - g) The number and description of any injuries or fatalities
 - h) A summary of your current understanding as to the nature of the incident and/or the cause of the breakage (including whether a rock or other item of road debris was found)
 - i) A summary of any other information relevant to your investigation of the incident.

Response:

See attachment "Exhibit A".

Sincerely,

AMERICAN HONDA MOTOR CO., INC.



John Turley
Senior Manager
Product Regulatory Office

JET:cmb

Attachments