



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

Kia Motors America, Inc.

Corporate Headquarters

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June 16, 2016

VIA E-MAIL

Scott Yon, Chief of Vehicle Integrity Division
Office of Defects Investigation
U.S. Department of Transportation
National Highway Traffic Safety Administration
1200 New Jersey Avenue, S.E.
Washington, D.C. 20590
Scott.Yon@dot.gov

Re: **In Re: EA 14-002 Kia Sorento Sunroofs**
General Order Directed to Motor Vehicle Manufacturers

Dear Mr. Yon:

Kia Motors America, Inc. ("KMA") submits its responses to the General Order in the above-referenced matter.

REQUEST NO. 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 TO REQUEST NO. 1:

Kia Motors Corporation ("KMC") first began considering whether to incorporate panoramic sunroofs into its vehicles in about May 2007. The major factors driving such consideration were the existing successful applications of panoramic sunroofs by a range of automotive manufacturers, successful integration of panoramic sunroofs by sunroof manufacturers into auto manufacturer designs, and the strong public demand for such sunroofs. During this developmental stage, KMC working with sunroof and glass suppliers evaluated competitor vehicles and tracked the increasing number of vehicle models with panoramic sunroofs. Its evaluation showed that the 2 panel glass system was a standard design for the sunroof and was the logical first design to use in a panoramic sunroof. In June 2008, KMC decided to proceed with incorporating panoramic sunroofs in certain models. Working with North American sunroof assembly supplier Webasto Roof Systems, Inc., the first Kia model produced for sale in the U.S. with a panoramic sunroof occurred in December 2009 with the 2011MY Sorento. As

product design in the industry moved towards a 3 panel design for aesthetic reasons, Kia began incorporating that 3 panel design in its vehicles. The first Kia models with a 3 panel design were the 2011 Kia Optima and Sportage vehicles.

REQUEST NO. 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 TO REQUEST NO. 2:

Pursuant to the email from Elizabeth Mykytiuk dated April 21, 2016, the response to this request is limited to the vehicle population manufactured for sale in the United States. The total number of 2011-2016MY Kia vehicle models manufactured with a panoramic sunroof for sale in the United States is 511,808. See **Tab 1** for a breakdown of each model by model year.

REQUEST NO. 3:

For each panoramic sunroof identified in your Response to Request No. 2, provide the following information: (i) the name and contact information for the sunroof manufacturer; (ii) the number of glass panels; (iii) the size of the glass panel(s) (length x width in centimeters); (iv) the thickness of the glass panel(s) (millimeters); and (v) the standard to which the sunroof was manufactured. Your response should include an explanation of any changes made between models and model years.

RESPONSE TO REQUEST NO. 3:

A chart containing the information responsive to this Request is attached. See **Tab 2**.

REQUEST NO. 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 TO REQUEST NO. 4:

A chart containing the information responsive to this Request is attached. See **Tab 3**.

REQUEST NO. 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 and media reports). The report shall include the following information: (i) the date on which you were first notified or learned of the incident; (ii) the name of the individual involved in the incident; (iii) the contact information for counsel representing that individual (if applicable); (iv) the make, model, and model year of the vehicle; (v) the vehicle identification number (VIN); (vi) the date, location and description of the incident (including whether the vehicle was stationary or in motion when the incident occurred); (vii) the number and description of any injuries or fatalities; (viii) 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); and (ix) a summary of any other

information relevant to your investigation of the incident. Your report should be in the format attached as Exhibit A.

RESPONSE TO REQUEST NO. 5:

The report of panoramic sunroof breakage incidents for the U.S. and Canada are attached. See **Tabs 4 & 5.**

Sincerely,


J.S. (Jurassic) Park
Executive Director, Product Liability &
Regulatory Compliance
Kia Motors America, Inc.

cc: Michael Lee (Michael.Lee@dot.gov)
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