



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

November 10, 2014

Mr. Frank S. Borris II, Director  
Office of Defects Investigation  
Office of Enforcement  
U.S. DEPARTMENT OF TRANSPORTATION  
National Highway Traffic Safety Administration  
1200 New Jersey Avenue, SE  
Washington, DC 20590

**Re: EA14-004  
2008 Accord 4-door vehicles  
Inadvertent side airbag deployments**

Dear Mr. Borris:

In reply to your letter dated September 8, 2014 we are submitting our response regarding allegations of inadvertent or unwanted airbag deployment of the side curtain and/or torso (seat-mounted) airbag as a result of closing or shutting the vehicle's door, in certain model year 2008 Honda Accord 4-door vehicles.

1. **State the number of subject vehicles that 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. **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:

*The data elements "a" through "g" are provided in the file titled "PRODUCTION\_DATA" on the enclosed CD.*

<b>Make</b>	<b>Model Year</b>	<b>Model</b>	<b># Manufactured for Sales/Lease</b>
HONDA	2008	ACCORD 4-DOOR	335,195

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;
- 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 "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 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 number, and date on which the complaint or other document initiating the action was filed.

Response:

The total number of reports for items "a" through "f" is stated in the table below.

See Attachment #Q2 on enclosed CD for summary description for items "c" through "f".

There is an increase of almost 100 additional owner and fleet reports, due to an additional search term that was identified. This also applies for any new reports received since the data was last captured on February 13, 2014.

The additional reports were placed under a code for "front deployment", while codes only pertaining to "side deployment" were used in the data search for PE14-004. The new reports were discovered while comparing warranty data against customer complaints and during further review, the additional reports were discovered and included in this response.

It should be noted that of the 19 injuries shown in the chart, 4 reports are duplicate (customer complaints and lawsuits for the same alleged events), and that Honda has also judged these injuries as minor injuries.

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

Make	Model Year	Model	A Owner and Fleet Reports	B Field and Dealer Reports	C-1 Injury Reports	C-2 Fatality Reports	D Property Damage	E Third-Party Arbitration	F Claims or Lawsuits
Honda	2008	Accord 4-Door	225	159	19	0	0	1	4

Source(s): Customer Relations, Tech Line, Field Reports, Claims and Lawsuits.  
 As of: September 30, 2014

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., a. consumer complaint, b. field report, f. lawsuits 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 property damage is alleged;
- j. Number of alleged injuries, if any, and
- k. Number of alleged fatalities, if any.

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

Response:

The data elements "a" through "k" is provided in the file titled "REQUEST NUMBER TWO DATA" on the enclosed CD.

Source(s): Customer Relations, Tech Line, Field Reports, Claims and Lawsuits.  
As of: September 30, 2014

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 files are organized by model, model year, category then the last six digits of the VIN.

Source(s): Customer Relations, Tech Line, Field Reports, Claims and Lawsuits.  
As of: September 30, 2014

5. State 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. Vehicle's VIN;
- d. Vehicle's make, model and model year;
- e. Repair date;
- f. Vehicle mileage at time of repair;
- g. Repairing dealers 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:

The total warranty counts are provided in the table below. The data elements "a" through "l" are provided in the file titled "WARRANTY DATA" on the enclosed CD.

The total of 89 warranty claims contains 45 cases with duplicate VIN numbers.  
The total 131 goodwill claims contains 59 cases with duplicate VIN numbers  
Duplicate claims per VIN/vehicle represent multiple repairs for each allegation not multiple allegations.

Make	Model Year	Model	Warranty Claims	Goodwill Claims
Honda	2008	Accord 4-Door	89	131

Source(s): Warranty claim data.  
As of: September 30, 2014

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 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 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:

*Search Criteria:* Using warranty data for all subject vehicles, claims were included based on the part numbers for the related SRS unit, airbags, and crash sensors. The contention text description was reviewed for each claim to identify allegations related to a door slam event.

*Coding and Descriptions:* See Attachment #Q6

*Warranty Coverage:* All subject vehicles are covered by a new vehicle limited warranty for three years or 36,000 miles, whichever comes first. Under the terms of the new vehicle limited warranty, Honda will repair or replace any part that is defective in material or workmanship under normal use. This warranty covers all systems except emission control systems, accessories, battery, tires or IMA which have their own warranties.

In January 2014, Honda decided to issue a warranty extension for inadvertent side airbag deployments as a class action settlement, which includes 2008 Accord Sedans. The expected effective date is November 2014.

These vehicles are also covered by a 15 year seatbelt warranty; however none of the subject components involved in this inquiry are subject to the seatbelt warranty.

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 communications that Honda is planning to issue within the next 120 days.

Response: See Attachment #Q7

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, Honda. 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: See Attachment #Q8

9. 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 Technical Working Group's<sup>1</sup> out-of-position (OOP) side air bag (SAB) deployment testing or evaluation, as well as any other types of OOP SAB deployment testing or evaluation, involving the subject vehicles (including both production and pre-production MY 2008 Accord subject vehicles) that have been conducted, are being conducted, or planned, or are being planned by, or for, Honda. This includes, but is not limited to, any and all actions by the side curtain air bag manufacturer relating to OOP SAB testing or evaluation involving the subject vehicles. 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: See Attachment #Q9

10. Describe in detail all modifications or changes made by or on behalf of Honda (e.g., by a supplier) in the design, material composition, manufacture, quality control, supply, or installation of the subject components in the subject vehicles, including any related software revisions, 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. For each such modification or change, 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 Honda is aware of which may be incorporated into vehicle production within the next 120 days.

Response: See Attachment #Q10

11. Describe the design and operation of the side curtain air bag (SCAB) system used in the subject vehicles. Provide all specifications for the SCAB system. Also, provide copies of all requirements, standards, strategies and guidelines that relate to, or may relate to SCAB out-of-position testing or evaluation that Honda or its air bag supplier used in any way during the design, development, testing or analysis of the subject vehicles. Finally, provide the SCAB system supplier's name, address, and point of contact use by Honda (Name, title and telephone number).

Response: See Attachment #Q11

12. State all part numbers of the subject components that have been installed on the subject vehicles as assembled by Honda, and the service part numbers of the subject components Honda 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 Honda. Identify any kits that Honda 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 a point of contact used by Honda (name, title, and telephone number). Also, identify by model and model year, any other vehicles of which Honda is aware that contain the identical component, whether installed in productions or in service and state the applicable dates of production or service usage.

Response: See Attachment #Q12

*The SRS ECU used on the 2008 Accord, part numbers ending in A01 and L01, was superseded in 2009 by the part numbers ending in A02 and L02. The Honda Parts Demand System tracks part sales for 5 years, therefore sales of part A01 and L01 which occurred prior to 2009, are not available.*

13. Furnish Honda's assessment of the alleged defect in the subject vehicles, including:
- a. The causal or contributory factor(s);
  - b. The failure mechanism(s);
  - c. The failure mode(s);
  - d. The risk to motor vehicle safety that is poses, including but not limited to, occupants that are out of position or in vulnerable positions such as a child sitting or standing in the path of side

- curtain air bag deployment or a parent putting a small child in a child seat with the parent's head or neck in the path of side curtain air bag deployment;
- e. What warnings, if any, the operator and the other persons both inside and outside the vehicle would have that the alleged defect was occurring or subject component was malfunctioning; and
  - f. The VOQ reports referenced in this inquiry.

Response: See Attachment #Q13 and the response stated below.

*As stated in Honda's response to PE14-004, dated March 28, 2014, and based on satisfying the NHTSA NCAP side airbag risk criteria, and the application of our Occupant Position Detection System and our assessment of usage condition, our conclusion remains that this condition does not pose an unreasonable risk to safety.*

Sincerely,

AMERICAN HONDA MOTOR CO., INC.



Jay Joseph  
Assistant Vice President  
Product Regulatory Office

JWJ:cmb

Attachments