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January 23, 2015

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: PE14-033
2013 Honda Accord
Power Steering**

Dear Mr. Quandt:

In reply to your letter dated November 24, 2014, we are submitting our response regarding the allegations of loss of power steering assistance in model year (MY) 2013 Honda Accord vehicles.

1. **State, by model, engine and model year, the number of subject and peer 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) **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 2007, or a compatible format, entitled "PE14-033 PRODUCTION DATA."

Response:

The data elements "a" through "g" are provided in the file titled "PRODUCTION DATA" on the enclosed CD. There are separate tables for each model.

Model	Model Year	# Manufactured for Sales/Lease
Accord	2013	373,949

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 and peer 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; and
- 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 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". Honda did not identify any relevant reports for items "d" 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
ACCORD	2013	73	274	29	5	0	1	22	3

Source(s): Customer Relations, Tech Line, Field Reports, Claims and Lawsuits.
 As of: December 15, 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., consumer complaint, field report, etc.);
- c) Vehicle owner or fleet name (and fleet contact person);
- d) Vehicle owner's address;
- e) Vehicle owner's contact telephone number(s);
- f) Vehicle's VIN;
- g) Vehicle's model;
- h) Vehicle's model year;
- i) Vehicle's mileage at time of incident;
- j) Incident date;
- k) Report or claim date;
- l) Whether a crash is alleged;
- m) Whether a fire is alleged;
- n) Whether property damage is alleged;
- o) Number of alleged injuries, if any; and
- p) Number of alleged fatalities, if any.

Provide this information in Microsoft Access 2007, or a compatible format, entitled "REQUEST NUMBER THREE DATA."

Response:

The data elements "a" through "p" are provided in the file titled "REQUEST NUMBER THREE DATA" on the enclosed CD.

*Source(s): Customer Relations, Tech Line, Field Reports, Claims and Lawsuits.
As of: December 15, 2014*

4. Produce copies of all documents related to each item within the scope of Request No. 3. 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 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: December 15, 2014*

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 and peer vehicles: warranty claims; extended warranty claims; claims for goodwill 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; and
- k) Comment, if any, by dealer/technician relating to claim and/or repair.

Provide this information in Microsoft Access 2007, or a compatible format, entitled "PE14-033 WARRANTY DATA."

Response:

The total warranty counts are provided in the table below. The data elements "a" through "p," are provided in the file titled "PE14-033 WARRANTY DATA" on the enclosed CD.

Model	Model Year	Warranty Claims	Extended Warranty	Goodwill Claims	Warranty Claims TSB
Accord	2013	469	0	11	0

Source(s): Warranty claim data.
As of: December 16, 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 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 extended warranty.

Response:

Search Criteria: Using warranty data for all subject and peer vehicles, claims were pulled based on the Electronic Power Steering Gearbox, Steering Angle Sensor and VSA Modulator part numbers. The contention text description was reviewed for each claim to identify the following symptom: loss of power steering assist while driving.

Coding and Descriptions: See Attachment #Q6

Warranty Coverage: All subject and peer 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. Honda has not issued extended warranty coverage related to the alleged defect in any of the subject or peer vehicles.

*Source(s): Warranty claim data.
As of: December 16, 2014*

- 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:

No service, warranty or other documents have been issued by Honda in regards to the alleged defect.

Currently no communication is planned within the next 120 days.

- 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 and peer vehicles that have been conducted, are being conducted, are planned, or are being planned by, or for, Honda. 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.

Response:

See Attachment #Q8

9. Describe all modifications or changes made by, or on behalf of, Honda in the design, material composition, manufacture, quality control, supply, installation or routing of the subject components from the start of production to date, 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 numbers (service and engineering) of the original component;
 - e) The part number (service and engineering) 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:

No design changes occurred during the specified time; however manufacturing changes are outlined in Attachment #Q9.

10. State the number of each of the following that Honda has sold that may be used in subject or peer vehicles by component name, part number (both service and engineering/production), model and model year of the vehicle in which it is used and month/year of sale (including the cut-off date for sales, if applicable):

For each component part number, provide the supplier's name, address, and appropriate point of contact (name, title, and telephone number). Also identify by make, model and model year, any other vehicles of which Honda 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:

See Attachment #Q10

11. Provide the following information regarding subject vehicles and subject system:
- a) Describe the subject system and provide diagrams of the complete steering system;
 - b) Provide a functional block diagram of the subject system showing all EPS controllers, sensor inputs and actuator outputs;
 - c) Describe the subject system diagnostics, including a list of all associated diagnostic trouble codes, the name/description of each, a detailed description of

- the conditions necessary to set the code, and the conditions necessary to clear the code;
- d) Provide a video file showing all driver visual and audible chimes, messages, and/or warning lamps associated with each of the faults identified in 11.c;
 - e) Describe failsafe operation for the subject system for each of the faults/conditions identified in 11.c, including the transition times from normal to failsafe mode and any restrictions on when the transition can occur (e.g. maximum steering torque at which change can be made from normal to failsafe mode);
 - f) Identify all vehicle design factors that Honda believes can influence steering effort in annual steering moved and provide the design information for the subject vehicles for each factor (e.g., steering ratio, front axle weight, etc);
 - g) Describe the range of speeds, lateral accelerations, steering angles, steering rates and steering efforts (normal and failsafe/manual modes) Honda believes can be expected for the subject vehicles in the following driving conditions/maneuvers: (1) parking lot maneuvers; (2) intersection turns (both right and left); (3) highway exit ramps (state all assumptions for speed and radius); (4) curves in roads with speed limits 25mph or less; (5) curves in secondary roads with speed limits of 30mph to 45mph; and (6) highway driving with speed limits at or above 60mph;
 - h) Provide a table showing steering hand wheel forces for both normal and manual modes under the following conditions: (1) lock-to-lock static turning, (2) 0.1G turn at 5mph, (3) 0.25G turn at 20mph, and (4) 0.4G turn at 30mph
 - i) Describe, and provide copies of all documents relating to, all testing performed to meet internal or external requirements for the steering system during transitions from normal to failsafe/manual steering mode (e.g., ECE R79); and
 - j) Describe, and provide copies of all documents relating to, all engineering requirements relating to changes in steering angle or steering effort during and after transition from normal to manual steering modes in subject vehicles.

Response:

See Attachment #Q11

12. 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 it poses;
 - 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 reports included with this inquiry.

Response:

See Attachment #Q12

At this time Honda is continuing to evaluate any risk that an EPS failure may pose to motor vehicle safety.

Mr. Jeffrey Quandt
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January 23, 2015
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Sincerely,

AMERICAN HONDA MOTOR CO., INC.



Jay Joseph
Assistant Vice President
Product Regulatory Office

JWJ:cmb

Attachments