



American Honda Motor Co., Inc.
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October 21, 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: **PE15-029**
2008-2010 Honda Accord
Restraint system control module (SRS Unit)

Dear Mr. Yon,

In reply to your letter dated September 2, 2015 we are submitting our response regarding allegations of SRS unit failure and/or SRS unit failure that may prevent air bags and other restraint system components from deploying during a crash.

1. **State, by model and model year, the number of subject 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. **Subject component part number and design version installed as original equipment;**
 - f. **Date of manufacture;**
 - g. **Date warranty coverage commenced; and**
 - h. **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 "h" are provided in the file titled "PRODUCTION_DATA" on the enclosed CD.

Make	Model Year	Model	# Manufactured for Sales/Lease
HONDA	2008	ACCORD 2DR / 4DR	273,786
HONDA	2009	ACCORD 2DR / 4DR	194,128
HONDA	2010	ACCORD 2DR / 4DR	185,862

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:
- Consumer complaints, including those from fleet operators;
 - Field reports, including dealer field reports;
 - Reports involving a crash, injury, or fatality;
 - Property damage claims;
 - Third-party arbitration proceedings where Honda is or was a party to the arbitration; and
 - Lawsuits, both pending and closed, in which Honda is or was a defendant or codefendant.

For subparts "a" and "b", include complaints and field reports where restraint system control module failure was diagnosed (with or without fault codes) as requiring module replacement but the customer chose not to have the repairs performed.

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".

It should be noted that of the 241 injuries shown in the chart, 24 reports are duplicate (customer complaints and lawsuits for the same alleged events), and that Honda has not judged the severity of these 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 2DR/4DR	603	77	79	0	8	0	4
Honda	2009	ACCORD 2DR/4DR	230	19	79	0	7	0	2
Honda	2010	ACCORD 2DR/4DR	174	7	83	0	1	0	2

Source(s): Customer Relations, Tech Line, Field Reports, Claims and Lawsuits.
As of: September 4, 2015

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:
- Honda's file number or other identifier used;
 - The category of the item, as identified in Request No. 2 (i.e., a. consumer complaint, b. field report, f. lawsuits etc.);
 - Vehicle owner or fleet name (and fleet contact person), street address, email address, and telephone number;
 - Vehicle's VIN;
 - Vehicle's make, model and model year;
 - Vehicle's mileage at time of incident;
 - Incident date;
 - Whether the airbag warning light was illuminated;
 - Whether any trouble codes were retrieved from the vehicle;
 - Whether the restraint system control module was diagnosed as failed/needing replacement;
 - Whether the restraint control module was replaced;
 - Report or claim date;
 - Whether a crash is alleged;
 - Whether property damage is alleged;
 - Number of alleged injuries, if any, and
 - 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 "p" 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 4, 2015*

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 methods and search criteria used by Honda to identify the items in response to Request No. 2.

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 by model year and organized by the last eight digits of the VIN, (the first digit of the last 8 digits represents vehicle model year 8=2008, 9=2009, A=2010).

Search Criteria: Data from each of the categories is gathered by component/complaint related codes. The reports are then reviewed individually to determine if they are related to the alleged

defect (SRS light illuminated, SRS unit failure/replacement, a crash with no airbag deployment or any combination thereof).

*Source(s): Customer Relations, Tech Line, Field Reports, Claims and Lawsuits.
As of: September 4, 2015*

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 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. Include claims where restraint system control module failure was diagnosed (with or without fault codes) as requiring module replacement but the customer chose not to have the repairs performed.**

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. **Repair date;**
- e. **Vehicle mileage at time of repair;**
- f. **Repairing dealers or facility's name, telephone number, city and state or ZIP code;**
- g. **Labor operation number;**
- h. **Problem code;**
- i. **Diagnostic code;**
- j. **Air bag warning light illuminated (Y/N);**
- k. **Restraint system control module diagnosed at failed/needing replacement (Y/N);**
- l. **Restraint control module replaced (Y/N);**
- m. **Replacement part number(s) and description(s);**
- n. **Concern stated by customer**
- o. **Cause as stated on the repair order**
- p. **Correction as stated on the repair order; and**
- q. **Comments, 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 "q" are provided in the file titled "WARRANTY DATA" on the enclosed CD.

Claims in which the customer declined repair are not included. Warranty claims are submitted by the dealer to be reimbursed for work performed, therefore if the customer declined repair then there is nothing to be reimbursed for.

*The total of 1665 warranty claims contains 92 cases with duplicate VIN numbers.
The total of 543 goodwill claims contains 11 cases with duplicate VIN numbers.
The total of 200 extended warranty claims contains 4 cases with duplicate VIN numbers.
Duplicate claims per VIN represent multiple repairs for each allegation not multiple allegations.*

Make	Model Year	Model	Warranty Claims	Goodwill Claims	Extended Warranty
Honda	2008	Accord 2Dr & 4Dr	901	534	191
Honda	2009	Accord 2Dr & 4Dr	21	9	8
Honda	2010	Accord 2Dr & 4Dr	0	0	1

*Source(s): Warranty claim data.
As of: September 4, 2015.*

6. Describe in detail the search methods and criteria used by Honda to identify the claims in response to Request No. 5, including the labor operations, problem codes, diagnostic codes, part numbers and any other pertinent parameters used. Provide a list of all labor operations, labor operation descriptions, problem codes, problem code descriptions, diagnostic codes, and diagnostic code descriptions applicable to the alleged defect in the subject vehicles. State whether the diagnostic trouble codes are automatically reported to the warranty database electronically or manually entered into the warranty database by a claims administrator.

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 such extended warranty.

Response:

Search Criteria: Using warranty data for all subject vehicles, claims were gathered based on the part numbers for the related SRS units. The contention text description was reviewed for each claim to identify allegations related to SRS light illuminated, SRS unit failure/replacement, or a vehicle crash without airbag deployment.

The diagnostic codes are entered manually.

Codes 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 was 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. 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, or installation of the subject component, 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 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 #Q9

10. **State the number of each of the following that Honda has sold that may be used in the subject 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):**

Response: See Attachment #Q10

The SRS ECU used on the 2008 Accord sedan, part numbers ending in TA0-A01 and TA0-L01, was superseded in 2009 by the part numbers ending in TA0-A02 and TA0--L02, which were used through model year 2010. The SRS ECU used on the 2008-2010 Accord coupe, part number ending in TE0-A01 was used through the 2010 model year.

The Honda Parts Demand System tracks part sales for 5 years, therefore sales of part A01 and L01 which occurred prior to 2010, are not available.

11. **Furnish Honda's assessment of the alleged defect in the subject vehicles, including:**
- The causal or contributory factor(s);**
 - The failure mechanism(s);**
 - The failure mode(s);**
 - The risk to motor vehicle safety that is poses;**
 - 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**
 - The reports included with this inquiry.**

Response: See Attachment #Q11 and the response stated below.

At this time Honda is continuing to analyze returned parts and to actively monitor the market. Honda continues to evaluate the risk that an SRS failure may pose to motor vehicle safety.

Sincerely,

AMERICAN HONDA MOTOR CO., INC.

John Turley
Senior Manager
Product Regulatory Office

JET:cmb

Attachments

10. **State the number of each of the following that Honda has sold that may be used in the subject 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):**

Response: See Attachment #Q10

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The Honda Parts Demand System tracks part sales for 5 years, therefore sales of part A01 and L01 which occurred prior to 2010, are not available.

11. **Furnish Honda's assessment of the alleged defect in the subject vehicles, including:**

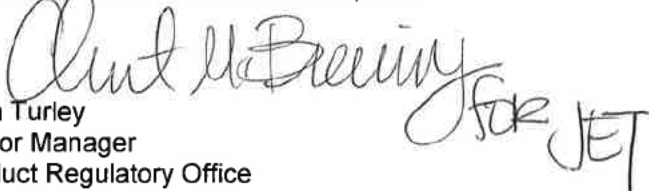
- a. **The causal or contributory factor(s);**
- b. **The failure mechanism(s);**
- c. **The failure mode(s);**
- d. **The risk to motor vehicle safety that is poses;**
- e. **What warnings, if any, the operator and the other persons both inside and outside the vehicle would have that the alleged defect was occurring or subject component was malfunctioning; and**
- f. **The reports included with this inquiry.**

Response: See Attachment #Q11 and the response stated below.

At this time Honda is continuing to analyze returned parts and to actively monitor the market. Honda continues to evaluate the risk that an SRS failure may pose to motor vehicle safety.

Sincerely,

AMERICAN HONDA MOTOR CO., INC.


John Turley
Senior Manager
Product Regulatory Office

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