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November 16, 2018

VIA FEDERAL EXPRESS

Paul Simmons, Chief
Vehicle Defect Division C
Office of Defects Investigation
U.S. Department of Transportation
National Highway Traffic Safety Administration
1200 New Jersey Avenue, S.E.
Washington D.C. 20590

Re: **Defect Petition (DP18-003)**
Non-Crash Fires (MY) 2010-2015 Kia Soul

Dear Mr. Simmons:

This letter is submitted in response to your letter received on October 19, 2018, by Kia Motors America, Inc. ("Kia") (Reference NEF-103mjl/DP18-003). That letter requested information regarding allegations of non-crash fires involving model year (MY) 2010-2015 Kia Soul vehicles.

REQUEST NO. 1:

State, by model, model year, and engine type, the number of subject vehicles Kia has manufactured for sale or lease in the United States. Separately, for each subject vehicle manufactured to date by Kia, state the following:

- a. Vehicle identification number (VIN);
- b. Make;
- c. Model;
- d. Model year;
- e. Engine (by type, displacement and company engine code);
- 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 TO REQUEST NO. 1:

A chart summarizing the total number of 2010-2015 Kia Soul vehicles broken down by model and model year is being provided. **TAB 1.** A list of these vehicles is provided on the data collection file under the category "PRODUCTION DATA" and is submitted concurrently with this response.

REQUEST NO. 2:

State, by model, model year, and alleged defect category (i.e., A, B and C), the number of each of the following, received by Kia, or of which Kia 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 fire, crash, injury or fatality;
- d. Property damage claims;
- e. Third-party arbitration proceedings where Kia is or was a party to the arbitration; and
- f. Lawsuits, both pending and closed, in which Kia 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 Kia'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 TO REQUEST NO. 2:

A chart summarizing the total of each of the items requested in 2(a) through (f) is being submitted concurrently with this response. **TAB 2.**

REQUEST NO. 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. Alleged defect category (i.e., A, B or C);
- b. Kia's file number or other identifier used;

- c. The category of the item, as identified in Request No. 2 (i.e., consumer complaint, field report, etc.);
- d. Vehicle owner or fleet name (and fleet contact person), street address, email address and telephone number;
- e. Vehicle's VIN;
- f. Vehicle's make, model and model year;
- g. Vehicle's mileage at time of incident;
- h. Incident date;
- i. Report or claim date;
- j. Whether property damage is alleged;
- k. Number of alleged injuries, if any;
- l. Number of alleged fatalities, if any, and;
- m. For property damage claims, the amount paid and, expressed as a percentage, the ratio of the amount paid to the amount claimed in the original demand.

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

RESPONSE TO REQUEST NO. 3:

A list of the responsive communications is provided on the data collection file under category "REQUEST NUMBER TWO DATA" and is submitted concurrently with this response.

REQUEST NO. 4:

Produce copies of all documents related to each item within the scope of Request No. 2 including, but not limit to, investigator's reports examining the origin, cause and course of any fire. Organize the documents separately by the alleged defect category (i.e., A, B and C) and field data category (i.e., consumer complaints, field reports, etc.) and describe the method Kia used for organizing the documents. Describe in detail the search methods and search criteria used by Kia to identify the items in response to Request No. 2.

RESPONSE TO REQUEST NO. 4:

Copies of the documents responsive to Request No. 2 are organized electronically in folders titled Alleged Defect A, B and C. Each Alleged Defect folder contains copies of the responsive Consumer Assistance Center Case Reports (CA's), Technical Assistance Center Case Reports, Field Reports, Lawsuits & Arbitrations, including documents relating to those cases, if any, and are organized by model year. Any document associated with a particular Kia file is named by the file number assigned to it by Kia as identified in Request 3(b).

KMA's search included all CA's, Field Reports and Techline Reports generated through August 31, 2018, that were TREAD coded for fire. In addition, separate searches using the words "smoke" and "flame", "smoke" and "melt", "smoke" and "burn", and "melt" and "burn" were

also conducted. Those cases were then reviewed for responsiveness. Any documents associated with a particular case are saved electronically in Kia's system and were pulled for purposes of this response. With respect to CA reports, KMA is not always able to extract incident date information in an automated manner from the source system. KMA will include the incident date if available. As to lawsuits and arbitrations, KMA's search included all Complaints and Arbitrations involving an allegation of a non-crash related fire in the subject vehicles of which KMA received notice on or before August 31, 2018.

REQUEST NO. 5:

State, by model and model year, a total count for all of the following categories of claims, collectively, that have been paid by Kia that relate to, or may relate to, the alleged defects 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. Kia's claim number;
- b. Vehicle owner or fleet name (and fleet contact person), street address, email address 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(s);
- h. Problem code(s);
- i. Diagnostic trouble code(s);
- j. Replacement part number(s) and description(s);
- k. Whether there was a claim for a towing expense on or near the date of the repairs to the subject components;
- l. Concern stated by customer;
- m. Cause as stated on the repair order;
- n. Correction as stated on the repair order; and
- o. Additional 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 TO REQUEST NO. 5:

A list of the Warranty claims identified as a result of the search specified in Kia's response to Request No. 6 is provided under the category "WARRANTY DATA". In addition, Kia is also providing a list of goodwill claims approved by the KMA Consumer Affairs Department under

the category WARRANTY DATA 2. Both Access files are submitted concurrently with this response.

REQUEST NO. 6:

Describe in detail the search methods and search criteria used by Kia to identify the claims 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 Kia 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 Kia 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 TO REQUEST NO. 6:

The Warranty claims are not specifically coded for fire. As a result, Kia searched for all repair/replacement warranty claims through August 31, 2018 applicable to the 2010-2015 Kia Soul vehicles. A key word search using the terms “fire,” “melt,” “smoke,” “flame” or “burn” was conducted. A review of records resulting from that initial search identified many that were non-responsive and thus additional searches were conducted to exclude claims that were clearly non-responsive such as the following: claims where the word “fire” appeared in the context of “misfire”, “firestone”, “firewall”; “fluid burnt” or “clutch burnt”; “bulb burnt or burned out” with no other obvious indication of a thermal event; claims involving excessive oil consumption (e.g., “burning a lot of oil”) or excessive smoke from exhaust claims. Based on a preliminary review of that data, Kia has categorized and separately identified claims it believes are responsive. Claims that either may or may not be responsive have separately been identified as well.

Codes Used. In your letter you requested that Kia provides its “problem code” information. Kia refers to the “problem code” as the “cause code” which carries a letter “C” and reflects the technician’s evaluation of the cause of the problem. You also requested that Kia provide information regarding the “concerns stated by the customer.” These are commonly referred to as “nature codes” and carry the “N” designation. These reflect the service writer’s or technician’s understanding of the customer’s concern.

There are no labor operations, labor operation descriptions, problem codes, and problem code descriptions specifically applicable to the alleged defect in the subject vehicles. However, a description of the labor operation and problem codes used for a specific claim are listed in the WARRANTY DATA.

The 2010-2015MY Soul vehicles have a 5 year, 60,000 mile basic warranty and a 10 year, 100,000 mile powertrain warranty. No extended or additional warranties were provided to Kia customers.

REQUEST NO. 7:

Produce copies of all service, warranty, and other documents that relate to, or may relate to, the alleged defects in the subject vehicles, that Kia 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 Kia is planning to issue within the next 120 days.

RESPONSE TO REQUEST NO. 7:

Copies of the documents responsive to this request are provided. **TABS 3-9.**

REQUEST NO. 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 defects in the subject vehicles that have been conducted, are being conducted, are planned, or are being planned by, or for, Kia. 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 TO REQUEST NO. 8:

A summary chart of the actions in response to this request is submitted concurrently with this response. **TAB 10.**

REQUEST NO. 9:

Describe all modifications or changes made by, or on behalf of, Kia in the design, material composition, manufacture, quality control, supply, or installation of the engine compartment components, from the start of production to date, which relate to, or may relate to, alleged defects A and B in the subject vehicles and either directly or indirectly reduce or mitigate the risk of fire or thermal events. 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) (service and engineering) of the original component;
- e. The part number(s) (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 Kia is aware of which may be incorporated into vehicle production within the next 120 days.

RESPONSE TO REQUEST NO. 9:

A chart identifying the information responsive to this request is submitted concurrently with this response. **TAB 11.**

REQUEST NO. 10:

Furnish Kia's assessment of the alleged defects in the subject vehicles, including:

- a. The root cause and all 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 VOQ reports referenced in this inquiry.

RESPONSE TO REQUEST NO. 10 (a)-(f):

Overview

Kia has provided information relating to non-collision fires. The term “fire” as defined in 49 CFR Part 579.4 includes all thermal events regardless of whether they result in a fire or not, such as smoke or melting incidents. Consequently, the data provided includes many thermal events in which the customer’s vehicle did not experience a fire as it is commonly understood by the public. As a result, you may later see Kia discussing and providing documentation regarding actual fires, which are far fewer than the thermal events which NHTSA has requested. Nevertheless, Kia has included the requested full range of thermal events specified by the Agency, and Kia’s complaint rates for such a broad range of thermal events are low. With the exception of one unique incident involving several injury-contributing factors more fully discussed below, no thermal events (“fires”) have resulted in a fatality in the 2010-2015MY Soul vehicles.

Data Analysis

The Agency has requested that Kia categorize its alleged thermal events into three (3) separate categories: (a) engine thermal events (“fires”); (b) thermal events (“fires”) outside of the engine compartment; and (c) thermal events (“fires”) with unknown cause or origin. Because NHTSA’s defect definitions focus on the origin of the fire rather than on a particular causal part, Kia’s assessment has been focused on customer complaints, as they tend to contain more detail about the circumstances leading up to, and after, an alleged fire and thus are more likely to assist in identifying the fire origin than are other data sources.¹ Kia has identified 401 customer complaints (210 actual fires; 191 non-fire events but within NHTSA’s “fire” definition) involving a non-collision vehicle fire or thermal event, for an approximate complaint rate of 0.06%.

Of the 401 alleged thermal events Kia has identified, approximately 58% (232) of them originated within the engine compartment. This is consistent with publicly available information which indicates that the majority of vehicle fires originate within the engine compartment. Of the 232 engine compartment incidents, approximately 21% involved a thermal event (“fires”) caused by a known headlamp issue primarily appearing in the 2014MY. Specifically, these complaints are related to bulb connector deformation caused by excessive heat exposure due to the high and low beam filaments overdrawing electrical current when in use. When this occurs, customers may experience diminished headlamp performance due to heat deformed (melted) headlamp bulb connectors. These events did not involve actual fires. To address this headlamp issue, Kia published Technical Service Bulletin (“TSB”) 093 in December 2015.

¹ The warranty claim data is not easily categorized into the alleged defect structure proposed by the information request. The warranty claim data also contain multiple claims related to a single incident and therefore is not reliable for evaluating incident rates since no single component is the focus of the Agency’s requests.

For the engine compartment thermal events (“fires”) not associated with the headlamp issue, and as with other manufacturers, our review of available data identified various mechanical and electrical failures which result in thermal events. These include failures related to the AC compressor; hose and piping failures causing fuel to be expelled in the presence of a hot surface; blower motor failure; electrical wiring or other power transmission failures related to lighting; clutch system failure; starter failure; spark plugs; radiator issues; improper installation or repair issues; and lack of maintenance.² None of the failure conditions identified by Kia, however, have been found to indicate a safety defect trend.³ As indicated by the U.S. Fire Administration (USFA), the vast majority (62%) of all vehicle fires originate within the engine, running gear, or wheel areas. This is consistent with the reality that vehicle engine compartments house a high density of complex electrical and mechanical components, piping systems and reservoirs containing flammable liquids, multiple heat sources that can initiate ignition, and various combustible materials.

Of the 401 incidents identified, 141 alleged thermal events (NHTSA defined “fires”) occurred outside of the engine compartment. Over half (~52%) of these incidents occurred in 2010MY Soul vehicles that are covered by Recall No. 10v388, which addressed the potential risk of front door trim panel fires caused by an electrical short due to an improperly soldered wiring harness. As of November 12, 2018, the completion rate for this recall is 95.86%. The remaining non-engine compartment thermal events (“fires”) involve a variety of causes, such as, seat heaters, dash panel wiring failures, center console, brakes, rear windshield failures, EV charging cable, radio, defroster issues, cargo area insulation, and aftermarket accessories. These non-engine compartment thermal events account for approximately 9% of the overall reported customer complaints Kia received.

While Kia has made significant efforts to determine the cause and/or origin of particular vehicle fires, the varied nature of fires creates investigation obstacles and challenges. This is reflected in a recent study conducted by USFA, which notes that 23% of highway vehicle fires lack a causal determination after an investigation. This is due to extensive vehicle damage caused by vehicle fires which frequently consume critical evidence necessary to identify cause and origin. Consistently, the causes of approximately 21% of the fire incidents reviewed and/or inspected by KMA cannot be identified.

Fatality During Soul Fire

NHTSA has requested Kia to evaluate any fatalities alleged to have been caused by the “Alleged Defects” identified in the Information Request letter. Kia’s review of its data has identified a single fatality incident, which occurred on April 19, 2017 when the decedent⁴ died in a vehicle

² Kia has also identified more than a negligible number of incidents cause by outside influences such as towing errors, engine compartment rodent and other vermin infestations, arson, and customer abuse.

³ 6% of the thermal events (“fires”) originating in the engine compartment were caused by external influences such as rubbish, leaves, road debris, etc.

⁴ To minimize the publication of personal identifiable information and protect the privacy of its customers, Kia is not using any names and locations related to this incident.

fire in his mother's 2014 Kia Soul. There have been several media reports suggesting that the decedent's death was caused by a defect in the 2014 Soul. Kia has investigated this incident and determined that those reports do not accurately present the facts of the incident. Specifically, the police and fire department reports indicate that the decedent departed his mother's apartment to a nearby business. According to the interview with the business owner where the decedent told his mother he intended to go, the decedent never arrived at that location on the date of the incident. Sometime after the decedent left the apartment, his mother stated that she heard an explosion and then saw the vehicle on fire through a window. Critically, a witness interviewed by police reported hearing the engine revving loudly and seeing smoke coming from the vehicle as it sat partially out of a parking space. Another witness approached the vehicle, and saw flames from under the front and sides of the vehicle's hood and smoke exiting in the left wheel area.

A third witness observing the decedent prior to his death reported he appeared to be initially slumped over the steering wheel. Then, the decedent raised his head and apparently realized the vehicle was on fire. The witness was unable to open the driver door and told the decedent he was going to throw him a knife so he could cut his seatbelt (however, there is no evidence that the seatbelt was jammed or that the door locks were not functioning) and he did in fact throw the decedent a knife through an open window. The decedent made no attempt to catch or retrieve it. The coroner performed a toxicology analysis which concluded that both Fentanyl and heroin were present in decedent's system. The Fentanyl levels were over 5.5 times the therapeutic limit and, according to the coroner, could have been a lethal dosage by themselves. Exacerbating this, the decedent's heroin level was significant. Further evidence of the magnitude of the decedent's impairment was discovered during a subsequent vehicle inspection which identified that the decedent's left (i.e., "braking") shoe was instead melted to the accelerator pedal and his right shoe was discovered to the left of the brake pedal, reflecting that the decedent was significantly impaired before leaving his mother's apartment.

Inspections of the vehicle indicate the fire originated in the engine compartment and moved rearward, likely penetrating the passenger compartment through openings in the floorboard, as plastic grommets were consumed by the fire. The analysis and conclusions of the police and fire investigators is that decedent lost consciousness while pressing his feet on the accelerator pedal, causing the engine to rev at high rpm. Extended revving of the engine will cause over-heating of the transmission fluid, causing expansion and then expulsion of hot transmission fluid on to hot engine sources such as the catalytic converter. In that superheated condition, fire will occur quickly. The ensuing fire in the engine compartment would then spread to other parts of the vehicle.

The evidence is thus clear that the combined misuse of the vehicle by the decedent and the decedent's impairment were the causes of this incident. By all indications, had decedent not been suffering from drug intoxication, he would not have caused this fire and he would have been able to undo his seatbelt, open the driver door and exit the vehicle safely.

Industry Comparison of 2010-2015 Soul Vehicle Fires

From an industrywide standpoint, vehicle fires can and do occur in all vehicle makes and models. According to the National Fire Protection Association's annual report, *Fire Loss in the United States 2017*, there were an estimated 168,000 fires in highway type vehicles in 2017, which represented a decrease of 3% from the prior year's report. This equates to an average of one fire every 3 minutes and 8 seconds, or a registered vehicle fleet fire rate of 0.63/1000 vehicles.

To give context to the perceived risk of fire in the subject Kia vehicles relative to other passenger vehicles, KMA reviewed reports produced by the Highway Loss Data Institute (HLDI) of the Insurance Institute for Highway Safety. With regular frequency, HLDI publishes publicly available reports⁵ for NHTSA which comprehensively address non-crash fire losses. The reports typically cover three model years of production, and the September report represents the most comprehensive coverage of exposure (expressed in insured vehicle years).⁶

With respect to the model year 2010-2015 Kia Soul vehicles that are the subject of DP18-003, there is no single HLDI report which captures all six (6) model years. However, a review of each of the four September reports (2013, 2014, 2015, and 2016) provides the full scope of the subject vehicles and provides some important context in evaluating how the subject vehicles compare to other passenger vehicles.

1. The September 2013 report captures fire claims data for model years 2010-2012 Soul. The report shows a relative claim frequency of 94 (or 6% lower than the passenger vehicle industry average) for the 2010-2012 Soul insured population. There are 14 other competitor models listed in the report with relative claim frequencies greater than the Kia Soul.
2. The September 2014 report captures fire claims data for model years 2011-2013 Soul. The report shows a relative claim frequency of 80 (or 20% lower than the passenger vehicle industry average) for the 2011-2013 Soul insured population. There are 23 competitor models with relative claim frequencies greater than the Kia Soul.
3. The September 2015 report captures fire claims data for model years 2012-2014 Soul. The report shows a relative claim frequency of 90 (or 10% lower than the passenger vehicle industry average) for the 2012-2014 Soul insured population. There are 20 competitor models with relative claim frequencies greater than the Kia Soul.
4. The September 2016 report captures fire claims data for model years 2013-2015 Soul. The report shows a relative claim frequency of 103 (or 3% above the passenger

⁵ Highway Loss Data Institute (HLDI) Insurance Report, "Non-crash Fire Losses; Prepared by HLDI for NHTSA"

⁶ Exposure is expressed in insured vehicle years. One insured vehicle year may consist of one vehicle insured for 365 days, or 2 vehicles insured for 6 months, or 365 vehicles insured for one day or any combination of vehicles and days that adds up to 365 days.

vehicle industry average). There are 19 competitor models with claim frequencies greater than the Kia Soul.

This pattern continues in the most current HLDI report for September 2018 for models years 2015-2017. While only the 2015 model year Soul is the subject of this petition, this report shows a relative claim frequency for this combination of vehicles of 117 (or 17% above the passenger industry average). There are 19 competitor models with claim frequencies greater than the Kia Soul.

Vehicles are complex and non-crash fires affect virtually every make and model of vehicle on the road today. Fires can result from a number of root causes other than defects, including human error, aftermarket additions, service and maintenance errors, lack of maintenance, and assembly errors. In a high percentage of instances, the resulting fire consumes the initial ignition evidence, making a determination of cause impossible. The subject Kia vehicles are not over-represented relative to the passenger car industry as a whole with regard to the risk of non-crash fires.

KMA has taken several aggressive steps to investigate, analyze and, if necessary, take field actions and initiate recalls, as needed. KMA has developed a dedicated portion of its customer assistance call center to manage every allegation of fire received. Each representative is equipped with a standardized protocol to capture key details of the alleged incident and compile a dossier of information on the vehicle, including witness observations, before routing the data package to Kia's new fire analysis management team for disposition. According to the United States Fire Administration, 23% of highway vehicle fires lack a casual determination after an investigation. KMA seeks to materially improve this percentage. Members of this team are placed throughout the United States to promptly respond to any future reported fires where we believe an opportunity exists to collect meaningful data.

In addition, KMA has enhanced the depth and thoroughness of its investigation efforts by retaining the services of an industry-respected expert automotive fire investigator and a former NHTSA Defects Senior Executive with over 20 years of safety defect investigation experience and management. KMA's objective is to maximize the collection of quality field data on vehicle fires over the next few months in order to augment its ongoing analysis of all available data. As new insights become available from the field, they are shared in real-time with Kia's team of field investigators and data analysts. KMA is also working closely with the Agency through weekly communications regarding vehicle inspections that have been conducted or which will be conducted in the future. This allows both KMA and NHTSA to share information in real-time regarding inspection results and any potential defect trends. Kia's goal is to promptly identify the existence of any common root cause of fires beyond those already known, communicate and discuss these with NHTSA, and take appropriate field action, including recalls to protect the safety of its customers.

Paul Simmons, Chief
Vehicle Defect Division C
Office of Defects Investigation
November 16, 2018
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Kia's assessment of the VOQs referenced in your letter is submitted concurrently with this response. **TAB 12.**

Sincerely,



J.S. (Jurassic) Park
Vice President, Product Litigation &
Regulatory Compliance
Kia Motors America, Inc.