

**HONDA**

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

May 11, 2022

Dr. Stephen Ridella, Director  
Office of Defects Investigation  
U.S. Department of Transportation  
National Highway Traffic Safety Administration  
1200 New Jersey Ave., SE  
Washington, DC 20590

Re: EA19-001/NEF-102bes

Dear Dr. Ridella:

In reply to your letter dated March 31, 2022, we are submitting this response regarding your investigation into allegations of the failure of ZF ACUs to maintain full operational function during a crash event due to ACU reset or shutdown from electrical overstress damage or electrical transients.

Pursuant to 49 U.S.C § 30166, please find below numbered responses to each of your information requests:

Should any questions arise after this submission, please feel free to contact Honda.

- 1. State, by model and model year 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 for ACUs returned from the field or from test vehicles;**
  - d. Reports involving a crash, injury or fatality;**
  - e. Property damage claims;**
  - f. Third-party arbitration proceedings where Honda is or was a party to the arbitration; and**
  - g. Lawsuits, both pending and closed, in which Honda is or was a defendant or codefendant.**

**For subparts “a” through “g” 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 “d” through “g” 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 “f” and**

**“g,” 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:**

*For more detail on data elements “a” through “g”, please see folder Q1, “Q1\_051122” in the attached .zip file.*



- 2. Separately, for each item (complaint, report, claim, notice, or matter) within the scope of your response to Request No. 1, state the following information:**
- a. Honda’s file number or another identifier used;**
  - b. The category of the item, as identified in Request No. 1 (i.e. consumer complaint, field report, etc.);**
  - c. Vehicle owner of fleet name (and fleet contact person), street address, email address and telephone number;**
  - d. Vehicle’s VIN;**
  - e. Vehicle’s make, model and model year;**
  - f. Vehicles mileage at time of incident;**
  - g. Incident date;**
  - h. Report or claim date;**
  - i. Whether a crash is alleged;**
  - j. Whether property damage is alleged;**
  - k. Number of alleged injuries, if any;**
    - i. The AIS score of the injuries; and**
    - ii. Description of injury and location.**
  - l. Number of alleged fatalities, if any; and**
  - m. All applicable indicators for the Alleged Defect (items A through H, as identified above).**

**Provide this information in Microsoft Access 2010, or compatible format, entitled “REQUEST NUMBER TWO DATA.” (Request TWO in previous IR Letter)**

**Response:**

*For data elements “a” through “m”, please see folder Q2\_Q3, “EA19-001\_Master Log” in the attached .zip file.*

3. Produce copies of all documents related to each item within the scope of Request No. 1. Organize the documents separately by category (i.e., consumer complaints, field reports, etc.) and describe the method Honda used for organizing the documents. Describe in detail the search methods and search criteria used by Honda to identify the items in response to Request No. 1.

Response:

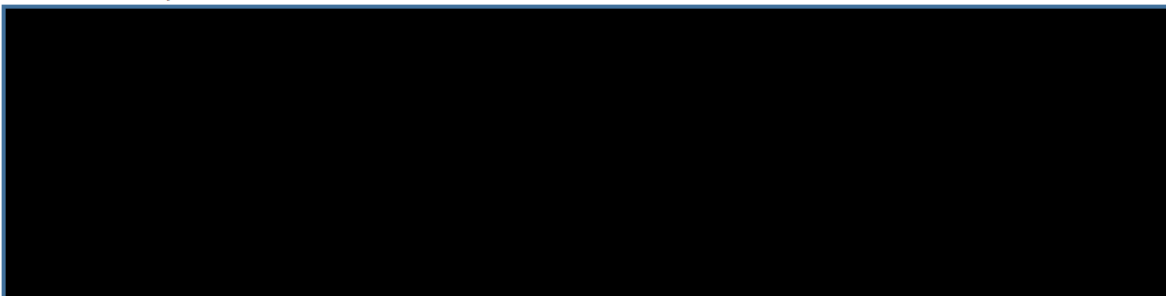
*For copies of documents related to Request No. 1, see folder Q2\_Q3 in the attached .zip file.*

*For search methodology, see folder Q3 in the attached .zip file.*

4. 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 situation, provide the following information:
- Action title or identifier;
  - The actual or planned start date;
  - The actual or expected end date;
  - Brief summary of the subject and objective of the action;
  - Engineering group(s)/supplier(s) responsible for designing and for conducting the action; and
  - Final Report of the findings and/or conclusions resulting from the action.

Response:

*Following our reply of September 20, 2019 to your initial information request letter of July 16, 2019, Honda had reported to NHTSA-ODI the following analysis/investigation as an update on March 19, 2020:*



*Please note that our response does not include materials subject to attorney-client privilege or the work product doctrine.*

5. Furnish Honda's assessment of the alleged defect in the subject vehicle, including:
- a. The causal or contributory factor(s);
  - b. The failure mechanism(s);
  - c. The failure mode(s);
  - d. Any prior safety recalls Honda has conducted to address EOS related failures of the subject ACU, the remedy that was utilized in that recall action, and how, in Honda's assessment, that action addresses any residual risk of an EOS failure of the DS84 ASIC;
  - e. The risk to motor vehicle safety that it poses;

Response:



Respectfully,

AM [REDACTED] INC.

Je [REDACTED]  
Senior Manager  
Product Regulatory Office

JHC:bi

cc: Brian Smith, NHTSA  
Sharon Yukevich, NHTSA  
Office of Chief Counsel, NHTSA

Attachments