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May 11, 2022

VIA ELECTRONIC SUBMISSION

Stephen Ridella, Ph.D., Director
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: **Engineering Analysis (EA19-001); ZF-TRW Airbag Control Units (ACUs)**

Dear Dr. Ridella:

This letter is submitted in response to your letter sent to Kia America, Inc. (“Kia”) regarding the Engineering Analysis (EA19-001//NEF-102bes) dated March 31, 2022. That letter requested certain updated information related to allegations of failing subject component airbag control units (ACUs) supplied by ZF Group during crash events in certain Kia vehicles.

REQUEST NO. 1:

State, by model and model year 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 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 Kia is or was a party to the arbitration; and
- g. Lawsuits, both pending and closed, in which Kia 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 Kia’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 TO REQUEST NO. 1:

- a. Consumer Complaints (CA)—0
- b. Field Reports—0
Technical Assistance Reports—0
- c. Reports for ACUs returned from the field or from test vehicles--0
- d. Reports involving a crash, injury or fatality—0
- e. Property Damage Claims—0;
- f. Third-Party Arbitration—0
- g. Lawsuits—0

The source of information submitted in response to this request is both Kia America, Inc. and Kia Corporation.

REQUEST NO. 2:

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. Kia’s file number or other identifier used;
- b. The category of the item, as identified in Request No. 1 (i.e., consumer complaint, field report, etc.);
- c. Vehicle owner or 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. Vehicle’s 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 a compatible format, entitled "REQUEST NUMBER TWO DATA." (Request TWO in previous IR Letter)

RESPONSE TO REQUEST NO. 2:

Not applicable. See Response to Request No. 1.

REQUEST NO. 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 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. 1.

RESPONSE TO REQUEST NO. 3:

There are no documents. See Response to Request No. 1. KA's search included all CA's, Field Reports, Techlines, Lawsuit Complaints, Claims and Arbitrations received from July 1, 2019 through March 31, 2022 which included the words "'crash' and 'air_bag'", "'crash' and 'airbag'", "'collision' and 'air_bag'", "'collision' and 'airbag'", "'accident' and 'air_bag'", and "'accident' and 'airbag'" for the subject vehicles identified in Kia's EA19-001 response to Request No. 1 dated August 30, 2019. The results were then reviewed to identify any reports which related to, or may related to the Alleged Defect as described in your letter. No responsive information was identified.

REQUEST NO. 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, Kia. For each such action, provide the following information:

- a. Action title or identifier;
- b. The actual or planned start date;

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- 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. Final Report of the findings and/or conclusions resulting from the action.

RESPONSE TO REQUEST NO. 4:

There are no documents responsive to this request.

The source of information submitted in response to this request is both Kia America, Inc. and Kia Corporation.

REQUEST NO. 5:

Furnish KIA'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. Any prior safety recalls Kia has conducted to address EOS related failures of the subject ACU, the remedy that was utilized in that recall action, and how, in Kia'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 TO REQUEST NO. 5:

Not applicable. A review of the field data requested for the response to Request No. 1 identifies that there are no incidents involving the Alleged Defect in the Subject Vehicles.

Sincerely,



J.S. (Jurassic) Park
Vice President, Chief Safety Officer