

Terrie J. Haggey

10/19/2020

Administrator
c/o Deputy Administrator James C. Owens
National Highway Traffic Safety Administration
1200 New Jersey Avenue SE, West Building
Washington, D.C. 20590

PETITION FOR DEFECT INVESTIGATION

Deputy Administrator Owens:

In accordance with 49 U.S.C. 30162 and 49 C.F.R. § 552.1, I Terrie J. Haggey, on behalf of myself and all individuals who own and share the road with 2013 Honda Accord vehicles, hereby petition the National Highway Traffic Safety Administration (NHTSA) to initiate a safety defect investigation into a subset of these vehicles which exhibit a definable and consistent pattern of power steering column failures but does not fall under the 2015 agreement between Honda and the NHTSA to extend the warranty for failures in the power steering column. The particular pattern of failure in question results not only in a loss of steering control but a situation where the vehicle changes direction by itself. If the investigation concludes that these vehicles contain a "defect that relates to motor vehicle safety," because of the potential for more vehicle accidents caused by said power steering failure, such a defect would be an unreasonable risk to the public and NHTSA should issue a recall order pursuant to 49 U.S.C. §§ 30118(b), 30119, and 30120 for all 2013 Honda Accord vehicles.

Complaints submitted to NHTSA via Vehicle Owner Questionnaire (VOQ), and to other sources, reveal an alarming pattern of power steering failures where the steering wheel, of its own accord and without warning, turns to either the left or the right moving the vehicle suddenly in that direction without the driver's control. In my own case, in a controlled experiment at slow speeds in a deserted parking lot, my vehicle repeatedly turned 90 degrees of its own volition. This "behavior" was replicated by Honda Dealership mechanics. Based on this description of failure, VOQ complaints about this problem go back to 2014 and remain steady up until this year. The failure has resulted in

accidents and has occurred in both low mileage vehicles, such as mine, and in higher mileage vehicles.

The following are some typical examples of complaints from the VOQ database describing these failures:

NHTSA No. 11351660 August 25, 2020

TL* THE CONTACT OWNS A 2013 HONDA ACCORD. THE CONTACT STATED WHILE HER HUSBAND WAS DRIVING AT 35 MPH, WHEN THE STEERING WHEEL BEGAN TO PULL TO THE LEFT INDEPENDENTLY. THE CONTACT STATED NO WARNING LIGHT WAS ILLUMINATED. THE VEHICLE WAS TAKEN TO INDEPENDENT MECHANIC AND WAS INFORMED TO HAVE THE VEHICLE TAKEN TO LOCAL DEALER. THE VEHICLE WAS THEN TAKEN TO LOCAL DEALER COOKEVILLE HONDA LOCATED AT 560 NEAL ST, COOKEVILLE, TN 38501, (931) 528-6009, WHERE IT WAS DIAGNOSED WITH NEEDING "GEAR BOX" TO BE REPLACED. THE VEHICLE HAD NOT BEEN REPAIRED AS OF YET. THE MANUFACTURER HAD BEEN INFORMED OF FAILURE. THE FAILURE MILEAGE WAS 112,000.

NHTSA No. 11349961 July 9, 2020 (mine)

I PURCHASED MY 2013 HONDA ACCORD LAST FALL. IT HAD 28,000 MILES ON IT AT PURCHASE AND HAS 36,700 MILES TODAY. ABOUT TWO WEEKS AFTER I HAD AN OIL CHANGE AND TIRES ROTATED, I BEGAN HAVING ISSUES WITH THE POWER STEERING PULLING LEFT. AT ONE POINT WHILE TRAVELING AT 50MPH ON A CROWDED CITY HIGHWAY, MY STEERING WHEEL JERKED LEFT AND I COULD HAVE HIT THE CAR IN THE LANE NEXT TO ME. THE PROBLEM PRESENTED AT INTERMITTENT TIMES OCCURRING LATER RATHER THAN EARLIER IN A TRIP. I DID AN EXPERIMENT IN A DESERTED AREA OF A PARKING LOT; ROLLING FORWARD VERY SLOWLY, I LET GO OF THE STEERING WHEEL. THE STEERING WHEEL SPUN TO THE LEFT AND THE CAR EXECUTED A PERFECT 90-DEGREE LEFT TURN BY ITSELF. THE CAR DID THIS AGAIN TWICE MORE DESPITE TURNING THE ENGINE OFF FOR A PERIOD BEFORE TURNING IT BACK ON. I TOOK IT BACK TO MY LOCAL MECHANIC WHO COULD FIND NO ERROR CODE BUT COULD REPLICATE THE PROBLEM. AFTER RESETTING THE TORQUE SENSOR, IT WAS A BIT BETTER BUT NOT FIXED AS THE CAR STILL WANTS TO TURN LEFT. THE STEERING IS ERRATIC SOMETIMES IT IS HARD TO TURN RIGHT AND SOMETIMES THE STEERING FEELS LOOSE. MY LOCAL MECHANIC SENT ME BACK TO THE DEALERSHIP WHERE I PURCHASED THE CAR WHO SUGGESTED I TAKE IT

TO A HONDA DEALER. THE DEALER'S SERVICE DEPARTMENT ALSO REPLICATED THE PROBLEM BUT COULD NOT FIX IT BECAUSE THE CAR DID NOT SHOW ANY ERROR CODES AND HONDA WILL ONLY REIMBURSE THEM IF THE CAR SHOWS TWO SPECIFIC ERROR CODES. BOTH MECHANICS WHO LOOKED AT MY CAR STATE IT NEEDS A NEW POWER STEERING RACK AND STATED THIS IS A SAFETY ISSUE.

Complaint No. 1156378 12/5/18

I WAS DRIVING DOWN HILL ON A SLIGHTLY INCLINED CITY STREET WHEN THE CAR SUDDENLY VEERED TO THE LEFT. I WAS UNABLE TO CONTROL THE STEERING AND IN PANIC WAS UNABLE TO STOP THE CAR BEFORE CROSSING SEVERAL LANES AND HITTING A BUILDING. THERE WERE INJURIES TO MYSELF AND MY PASSENGER. THE CAR WAS A TOTAL LOSS AND THE BUILDING SUSTAINED STRUCTURAL DAMAGE. [XXX]

INFORMATION REDACTED PURSUANT TO THE FREEDOM OF INFORMATION ACT (FOIA), 5 U.S.C. 552(B)(6). *PM

Complaint No. 10597052 06/09/2014

L* THE CONTACT OWNS A 2013 HONDA ACCORD. WHEN THE CONTACT STARTED THE VEHICLE, THE STEERING WHEEL AUTOMATICALLY ENGAGED AND TURNED IN A FULL CIRCLE. THE VEHICLE WAS TOWED TO THE DEALER AND WAS NOT REPAIRED. THE MANUFACTURER WAS NOT NOTIFIED. THE APPROXIMATE FAILURE MILEAGE WAS 12,500. UPDATED 8/11/14*CN UPDATED 8/30/2017*CN

Where the information is included in the VOQ complaint, none of these vehicles, including mine, ever display a warning light, nor do they ever come up with an error code despite the extreme "behavior" the steering column is displaying. These failures, therefore, are not covered under the 2015 warranty agreement, leaving Honda owners with a very expensive repair needed to make their car safe to be on the road. There are currently 224 complaints in the VOQ database related to 2013 Honda Accord power steering columns. At least 10% of these complaints relate to the problem that I am describing, a problem that poses a significant safety problem for both the owner and other vehicles that share the road. It does not make sense that only some, and not all, problematic steering columns should be replaced by the manufacturer in the 2013 Honda Accord. I urge the NHTSA to grant this Petition for a Defect Investigation into this problem. In 2017, the NHTSA closed its investigation into 2013 Honda Accord steering column defect because complaints had decreased. The complaints have not decreased so

much as leveled off as they remain at a steady 20-30 complaints every year. As I have stated, roughly 10% of these complaints are of the type I have described. This represents an ongoing hazard to the driving public. Pursuant to 49 U.S.C. § 30162(d), I formally request NHTSA respond to this petition within 120 days.

Sincerely,

Terrie J. Haggerty

Cc: The Center for Auto Safety