



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

April 15, 2021

NEF-101sly
 DP20-005

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

Dear Dr. Ridella:

In reply to your letter dated March 4, 2021, we are submitting our response to assist you with your investigation in relation to Defect Petition DP20-005 regarding allegations of an intermittent and sudden loss of steering direction control in 2013 Model Year (MY) Honda Accord vehicles, and to provide a response to your request for certain information concerning 2014 and 2015 MY Accord vehicles, deemed peer vehicles.

Persuant to 49 U.S.C SS 30166, please find below numbered responses to each of your information requests, as well as responses to your requests listed in Appendix A of your letter dated March 4, 2021:

1. **State, by model and model year, the number of peer 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. Date of manufacture;
 - f. Date warranty coverage commenced; and
 - g. 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:

Production data as of 03/31/2021:

Model	Model Year	Number of Units Manufactured
Accord	2014	██████
Accord	2015	██████

Data elements "a" through "g": Please see folder "Q1", filename "PRODUCTION DATA" in the attached .zip file.

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 peer vehicles:**

ENTIRE PAGE CONTAINS CONFIDENTIAL BUSINESS INFORMATION

- a. Consumer complaints, including those from fleet operators;
- b. Field reports, including dealer field reports;
- c. Reports involving a crash, injury or fatality;
- d. Property damage claims;
- e. Third-party arbitration proceedings where Honda is or was a party to the arbitration;
- f. Lawsuits, both pending and closed, in which Honda 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 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” are stated in the table below. Field reports include technician calls for assistance, internally known as Tech Line cases.

Report Type/Category	Total Count (2014)	Total Count (2015)
a. Consumer complaints, including those from fleet operators	█	█
b. Field reports, including dealer field reports	█	█
c. Reports involving a crash, injury or fatality	█	█
d. Property damage claims	█	█
e. Third-party arbitration proceedings where Honda is or was a party to the arbitration	█	█
f. Lawsuits, both pending and closed, in which Honda is or was a defendant or codefendant	█	█

*TL = Tech Line case, ACS = Consumer Complaint case

For the summary related to data elements “c” through “f”, please see folder “Q2”, filenames “2c”, “2d”, and “2f” in the attached .zip file.

Source(s): Automobile Customer Service (ACS), TechLine, Field Reports, Warranty Claims, and Matter management system.

As of: 03/31/2021

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. Honda’s file number or another identifier used;
 - b. The category of the item, as identified in Request No. 2 (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;
- l. Number of alleged fatalities, if any.

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

Response:

Data elements "a" through "l": Please see folder "Q3", filename "REQUEST NUMBER TWO DATA" in the attached .zip file.

Source(s): Automobile Customer Service (ACS), TechLine, Field Reports, Matter management system.
As of: 03/31/2021

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 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. 2.

Response:

Please see folder "Q4", filenames "DP20-005 Q4 ACS", "DP20-005 Q4 Tech Line", and "DP20-005 Q4 Lawsuit" in the attached .zip file for copies of documents related to this request.

Consumer Complaint Search Criteria:

All 2014 and 2015 Honda Accord customer concerns coded with the affected part being STEERING-EPS (electronic power steering) were searched against keywords of "P/S", "power steering", "gearbox", "EPS", "electronic power steering", "steering" and "steering wheel", in combination with the terms "fail", "has a lot of play", "difficult", "pull", "shaking", "turn", "jerks", "veer", "spin", "not working properly", and "loss of control".

Tech Line [Dealer Field Report System] Search Criteria:

All 2014 and 2015 Honda Accord complaints reported by dealers were searched for using the TechLine complaint codes listed in the table below. Reports were then contextually filtered for those that mentioned issues related to sudden loss of steering direction control using same set of keywords listed above for Consumer Complaints.

Complaint Code	Complaint Code Description
4900	Alignment Problems
5000	Steering General
5300	Steering Drifting Or Pulling
5310	Steering Drift/Pull Caused By Alignment
5400	Steering Clunk Noise Problem
5500	Power Steering Problem General
5600	EPS (Electronic Power Steering) DTC ?? [DTC UNKNOWN]
5610	Electronic Power Steering Erratic/Poor Assist
5620	Electronic Power Steering No Assist/No DTC
5630	Electronic Power Steering Binding, Mechanical

FQR [non-dealer Field Report System] Search Criteria:

All 2014 and 2015 Honda Accord reports related to steering were searched and contextually filtered for those that mentioned issues related to sudden loss of steering direction control using same set of keywords listed above for Consumer Complaints.

Lawsuit Search Criteria:

Searched Honda's matter management system for allegation codes related to Steering. Resulting list of Matters were then read through to search for those that mentioned issues related to sudden loss of steering direction control.

Source(s): Automobile Customer Service (ACS), TechLine, Field Quality Reports, Matter management system.
As of: 03/31/2021

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 peer vehicles: warranty claims; extended warranty claims; claims for goodwill 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. Honda'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. Concern stated by customer;
- l. Cause as stated on the repair order;
- m. Corrective action as stated on the repair order;
- n. Additional comments, if any, by dealer/technician relating to claim and/or repair.

Provide this information separately in Microsoft Access 2010, or a compatible format, entitled "WARRANTY DATA."

Response:

The total number of warranty claims is summarized in the table below:

Model	Model Year	Warranty Claims	Goodwill Claims	Extended Warranty	Vehicle Service Contract
Accord	2014				
Accord	2015				

Data elements "a" through "n": Please see folder "Q5", filename "WARRANTY DATA" in the attached .zip file. For 5h, please note that Honda does not utilize Problem Codes.

Source(s): Warranty claims data.
As of: 03/31/2021

6. Describe in detail the search methods and search criteria used by Honda to identify the claims in response to Request No. 5, including the labor operations, problem codes, diagnostic trouble 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, diagnostic trouble codes and diagnostic trouble 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 in 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:

Warranty Claim Search Criteria:

Using 2014 and 2015 Honda Accord warranty data, claims were queried with keywords "P/S", "power steering", "gearbox", "EPS", "electronic power steering", "steering" and "steering wheel", in combination with the terms "fail", "has a lot of play", "difficult", "pull", "shaking", "turn", "jerks", "veer", "spin", "not working properly", and "loss of control" within the customer concern/contention verbatim of the claim.

The alleged defect does not automatically trigger a diagnostic trouble code. Problem codes are not assigned. Labor operation and diagnostic trouble code (DTC) descriptions can be found below:

Labor Operation Legend:

Labor Operation	Description
511099	Straight Time Without Parts Manual Steering Gearbox
511102	Electric Steering Gearbox Motor - Replace
513097	Parts Only Power Steering Gearbox
513130	Electric Power Steering Control Unit (EPS) - Replace
5131C0	Steering Gearbox, Electric Power Steering - Replace
5131H2	Steering Gearbox (EPS) - Removal/Installation
5131H6	Gearbox, Power Steering
5131K9	Warranty Extension Campaign (5Z2/JT6): Power Steering Gearbox Assembly – Replace

Diagnostic Trouble Code Legend:

DTC	Description
71-03	Motor-Angle Sensor
31-01	EPS Torque Sensor Neutral Position Memorization
53-01	Torque Sensor (low/high check)
53-02	Torque Sensor (average check)

Source(s): Warranty claim data.

As of: 03/31/2021

Recall Repair Warranty Coverage: No stated coverage. If a customer experienced issues with the recall repair, general practice is to direct the customer to the dealership where it would be reviewed.

New Vehicle Warranty Coverage: The 2014 and 2015 Accord 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 or tires, which have their own warranties.

7. **Produce copies of all service, warranty, and other documents that may relate to, or may relate to, the alleged defect in the peer 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 communication that Honda is planning to issue within the next 120 days.**

Response:

Please see folder "Q7", filenames "AWL48372" and "AWL50465" in the attached .zip file for a copy of Honda's Standard New Vehicle Warranty booklets for 2014 and 2015 model year, respectively. To our knowledge, there are no other documents responsive to Q7.

Currently, no communication is planned within the next 120 days.

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 root cause in Honda's response to Request 10 dated February 1, 2021, in the subject and peer 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.

For further direction regarding the information required under Request 8, see Appendix A of this request, which contains information for which confidential treatment has been requested. Appendix A will be kept confidential in accordance with applicable law. See 49 U.S.C. § 30167; 49 C.F.R. Part 512, Subpart E.

Response:

Please see folder "Q8", filename "DP20-005_Q8" in the attachment for responses to question 8a through 8f, and the questions under Appendix A (1), as well as three other documents related to the actions (also previously provided in February 1, 2021 response).

No actions were taken involving any of the peer vehicles.

9. **Furnish Honda's assessment of any actions taken to remedy the effects of the alleged defect root cause. In the alternative, if no action was taken, furnish Honda's defect analysis.**

Response:

Please see folder "Q9", filename "DP20-005_Q9" in the attachment for responses to this question.

The listed actions were applied during 2013MY to address the alleged defect as a quality issue and no further actions were required for 2014 and 2015MY.

The subject and peer vehicles are out of production and will not experience any modifications or changes in the next 120 days.

For Request 10, see Appendix A of this request, which contains information for which confidential treatment has been requested. Appendix A will be kept confidential in accordance with applicable law. See 49 U.S.C. § 30167; 49 C.F.R. Part 512, Subpart E.

Response:

Please see folder "Appendix A Q10", filename "DP20-005_Q10" in the attachment for a response to this question.

Sincerely,

AMERICAN HONDA MOTOR CO., INC.



Jeff Chang
Senior Manager
Product Regulatory Office



JHC:bi

Attachments