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July 31, 2020

VIA FEDERAL EXPRESS

Paul Simmons, Chief
Vehicle Defects 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: **Preliminary Evaluation (PE20-008)**
Headlight Failures (MY) 2014-2015 Kia Soul and
(MY) 2011-2019 Kia Sorento

Dear Mr. Simmons:

This letter is submitted in response to your letter dated June 25, 2020 to Kia Motors America, Inc. ("Kia") (Reference NEF-103ej/PE20-008). That letter requested information regarding allegations of headlight failures involving model year (MY) 2014-2015 Kia Soul and (MY) 2011-2019 Kia Sorento vehicles. Kia will be providing supplemental responses to certain requests by August 24, 2020 as indicated below.

REQUEST NO. 1:

State, by model and model year, 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. Subject component part number and design version installed as original equipment;
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 subject vehicles broken down by model and model year is provided. **TAB 1.** A list of these vehicles is provided in Microsoft Access with the title "PRODUCTION DATA" and is submitted contemporaneously with this response.

REQUEST NO. 2:

State 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 crash, injury or fatality;
d. Reports involving a fire;
e. Property damage claims; and
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 "c" 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. 2:

Pursuant to the extension granted by Paul Simmons on July 27, 2020, the response to this Request will be provided on August 24, 2020.

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. Kia's file number or other 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 a fire is alleged;
k. Whether property damage is alleged;
l. Number of alleged injuries, if any; and
m. Number of alleged fatalities, if any.

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

RESPONSE TO REQUEST NO. 3:

A list of responsive communications for the 2014-2015MY Soul is provided in Microsoft Access with the title "REQUEST NUMBER TWO DATA" and is submitted with this response.

Pursuant to the extension granted by Paul Simmons on July 27, 2020, the response to this Request as it relates to the 2011-2019MY Sorento will be provided on August 24, 2020.

REQUEST NO. 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 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 for the 2014-2015 Kia Soul are organized electronically in folders titled Consumer Assistance Center Case Reports (CA's), Technical

Assistance Center Case Reports, Field Reports, Lawsuits & Arbitrations. Pursuant to the extension granted by Paul Simmons on July 27, 2020, the response to this Request as it relates to the 2011-2019MY Sorento will be provided on August 24, 2020.

KMA's search included all CA's, Field Reports and Techline Reports generated through May 31, 2020 using the words "headlight" and "headlamp". Those cases were then reviewed for responsiveness regarding issues relating to loss of illumination of one or both of the front headlamps. 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 loss of illumination of one or both front headlamps in the subject vehicles of which KMA received notice of on or before May 31, 2020.

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 to date that relate to, or may relate to, the alleged defect 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. Concern stated by customer;
l. Cause as stated on the repair order;
m. Correction as stated on the repair order; and
n. 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:

Pursuant to the extension granted by Paul Simmons on July 31, 2020, the entire response to this Request will be provided on August 24, 2020.

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, 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 into the warranty database by a claims administrator.

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 2014-2015MY Soul and 2011-2019MY Sorento vehicles have a 5-year, 60,000 mile New Vehicle Limited Warranty.

KMA extended the warranty coverage on the multi-function switch in the 2014 Soul to 15 years, unlimited mileage, from the date of first service to all owners for intermittent flickering of the headlamps.

KMA extended the warranty coverage for the halogen headlamp low beam connector wiring to 10 years, unlimited mileage, starting from the date of first service to all owners. The headlamp connectors may lose electrical contact with a low beam bulb in one the headlamp assemblies.

Pursuant to the extension granted by Paul Simmons on July 31, 2020, the remaining information responsive to this Request will be provided on August 24, 2020.

REQUEST NO. 7:

Produce copies of all service, warranty, and other documents that relate to, or may relate to, the alleged defect 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 2-22.**

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 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;
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:

Pursuant to the extension granted by Paul Simmons on July 27, 2020, the response to this Request will be provided on August 24, 2020.

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 subject component, from the start of production to date, which relate to, or may relate to, the alleged defect in the subject vehicles. 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:

Pursuant to the extension granted by Paul Simmons on July 27, 2020, the response to this Request will be provided on August 24, 2020.

REQUEST NO. 10:

Produce one of each of the following:

a. Exemplar samples of each design version of the subject component;
b. Field return samples of the subject component exhibiting the subject failure mode; and
c. Any kits that have been released, or developed, by Kia for use in service repairs to the subject component/assembly which relate, or may relate, to the alleged defect in the subject vehicles.

RESPONSE TO REQUEST NO. 10:

Pursuant to the extension granted by Paul Simmons on July 27, 2020, the response to this Request will be provided on August 24, 2020.

REQUEST NO. 11:

State the number of each of the following that Kia has sold that may be used in the subject vehicles by component name, part number (both service and engineering/production), model and model year of the vehicle in which it is used and month/year of sale (including the cutoff date for sales, if applicable):

a. Subject component; and
b. Add any similar or substantially similar components; and
c. Any kits that have been released, or developed, by Kia for use in service repairs to the subject component/assembly.

For each component part number, provide the supplier's name, address, and appropriate point of contact (name, title, and telephone number). Also, identify by make, model and model year, any other vehicles of which Kia is aware that contain the identical component, whether installed in production or in service, and state the applicable dates of production or service usage.

RESPONSE TO REQUEST NO. 11:

Pursuant to the extension granted by Paul Simmons on July 31, 2020, the response to this Request will be provided on August 24, 2020.

REQUEST NO. 12:

Furnish Kia'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. The risk to motor vehicle safety that it poses; and
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 reports included with this inquiry.

RESPONSE TO REQUEST NO. 12:

Pursuant to the extension granted by Paul Simmons on July 27, 2020, the response to this Request will be provided on August 24, 2020.

Sincerely,

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