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February 1, 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 December 4, 2020, 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.

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

1. **State, by model and model year, the number of subject 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 01/22/2021:

| Model | Model Year | Number of Units Manufactured |
|--------|------------|------------------------------|
| Accord | 2013 | ██████████ |

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 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. 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 |
|---|-------------|
| 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 the summary related to data elements “c” through “f,” please see folder “Q2”, filename “2c” in the attached .zip file.

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

As of: 01/25/2021

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: 01/22/2021

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", and "DP20-005 Q4 Tech Line" in the attached .zip file for copies of documents related to this request.

Consumer Complaint Search Criteria:

All 2013 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".

TechLine [Dealer Field Report System] Search Criteria:

All 2013 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_long_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 2013 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: 01/22/2021

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 and/or the subject components in the subject 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 | 2013 | | | | |

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: 01/22/2021

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 2013 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: 01/22/2021

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 2013 Accord is 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 subject 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", filename "AWL47382" in the attached .zip file for a copy of Honda's Standard New Vehicle Warranty. 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 in the subject vehicles that have been conducted, are being conducted, are being conducted, 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 in the summary the likelihood of the failure mode due to a sudden failure or progressive failure to the alleged defect. Produce copies of all documents related to the actions, regardless of whether the documents are in interim, draft, or final form. Organize the documents chronologically by action.

Response:

Please see folder "Q8", filename "DP20-005_Q8" in the attachment for responses to question 8a through 8f, as well as three other documents related to the actions.

- 9. Describe all modifications or changes made by, or on behalf of, Honda in the design, material composition, manufacture, quality control, supply, or installation of the subject components, 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 was 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 Honda is aware of which may be incorporated into vehicle production within the next 120 days.**

Response:

Please see folder "Q9", filename "DP20-005_Q9" in the attachment for responses to question 9a through 9h.

The subject vehicle is out of production and will not experience any modifications or changes in the next 120 days.

10. Furnish Honda's assessment of the alleged defect in the subject vehicle, including:

- a. The causal or contributory factor(s) and how they may relate to any other known steering system irregularities;**
- b. The failure mechanism(s);**
- c. The failure mode(s);**
- d. The risk to motor vehicle safety that it poses;**
- 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;**
- f. The reports included with this inquiry.**

Response:

[REDACTED]

Sincerely,

AMERICAN HONDA MOTOR CO., INC.



Jeff Chang
Senior Manager
Product Regulatory Office

JHC:bi

Attachments