INFORMATION REDACTED PURSUANT TOTHE FREEDOM OF INFORMATION ACT (FOIA), 5 U.S.C.552(B)(6)

SUZUKI

SUZUKI MOTOR OF AMERICA, INC.

May 29, 2020

Mr. Bruce B. York, Chief
Medium and Heavy Duty Vehicle Division
Office of Defects Investigation
National Highway Traffic Safety Administration
1200 New Jersey Avenue, SE
Washington, DC. 20590

NEF-106PHK
PE20-004

Dear Mr. York:

Following is Suzuki Motor of America, Inc.'s (SMAI's) partial response to the National Highway Traffic Safety Administration's (NHTSA's) Preliminary Evaluation (PE20-004) information request related to NHTSA's investigation of loss of headlights in certain 2018 model year Suzuki GSX250R motorcycles.

As agreed with you, SMAI is providing this as a partial response and will provide the balance of our response by June 26, 2020. This partial response includes SMAI's response to Requests 1 through 7, 9, and 11. As agreed with Mr. Kivett of your staff, we are providing information for only the 2019 model year Suzuki GSX250R peer vehicles, as there were no 2017 model year Suzuki GSX250R motorcycles produced for sale in the U.S.

SMAI notes that some of the information provided in this response is personal information such as names, addresses, telephone numbers, and complete Vehicle Identification Numbers (VINs). SMAI is producing this personal information with the understanding that NHTSA will protect this information from public disclosure in accordance with the provisions in 5 U.S.C. 552(b)(6).

Your requests and our corresponding replies are provided below.

1. *State, by model and model year, the number of the subject and peer vehicles Suzuki has manufactured for sale or lease in the United States. Separately, for each subject and peer vehicle manufactured to date by Suzuki, state the following:*
    a. *Vehicle identification number (VIN);*
    b. *Make;*
    c. *Model;*
    d. *Model Year;*

[redacted]

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 data in Microsoft Access 2010, or a compatible format, entitled "PRODUCTION DATA." See Enclosure 1, Data Collection Disc, for a pre-formatted table that provides further details regarding this submission.

The number of subject and peer vehicles, by model and model year, manufactured for sale or lease in United States is shown in the table below.

Model Year	Number of Vehicles
2018	2100
2019	600

Enclosed is a DVD containing a Microsoft Excel file entitled "PRODUCTION DATA" which includes the requested information for each of the identified subject and peer vehicles. Only the headlamp assembly part numbers are provided for the subject and peer vehicles. All of the subject and peer vehicles were produced with the same headlamp bulb (part number 09471-12060) and the same rubber cap behind the bulb (part number 35179-20K00).

The information sources for this request are Suzuki Motor Corporation (SMC) production records and SMAI master vehicle records. The last date that information was gathered to respond to this request is May 22, 2020.

2. *State the number of each of the following, received by Suzuki, or of which Suzuki is otherwise aware, which relate to, or may relate to, the alleged defect in the subject and peer 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;
f. Third-party arbitration proceedings where Suzuki is or was a party to the arbitration; and
g. Lawsuits, both pending and closed, in which Suzuki 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 Suzuki'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.

Suzuki has identified the following number of reports in each of the listed categories.

a. Consumer complaints	**-**	**2**
b. Field Reports	**-**	**64**
c. Reports involving a crash, injury, or fatality	**-**	**0**
d. Reports involving a fire	**-**	**0**
e. Property damage claims	**-**	**0**
f. Third-party arbitration proceedings	**-**	**0**
g. Lawsuits	**-**	**2**

SMAI notes that some of the field reports that are identified above are Field Technical Information Reports (FTIRs) that are re-issued versions of previously issued FTIRs. Even though the original report and the re-issued report are essentially the same report, we are identifying and summarizing them separately because they were issued with different report numbers. Likewise, we are providing copies of both reports in response to Request 4 because the original report or the re-issued report may contain some information that was not in the companion report.

The two lawsuits that were identified are breach of warranty lawsuits. The two motorcycles involved in the lawsuits were repurchased by SMAI for evaluation by SMC. SMC has only recently received the motorcycles involved in the two lawsuits identified above and has not yet been able to conduct an investigation involving these motorcycles. SMAI will provide the requested summary and assessment information relating to these lawsuits as part of its supplemental response that is due by June 26, 2020.

The information sources for this request are SMAI Customer Relationship Management (CRM) database records and SMC electronic data storage records. The last date that information was gathered to respond to this request is May 22, 2020.

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. *Suzuki's file number or other identifier used;*
   b. *The category of item, as identified in Request No. 2 (i.e., consumer complaint, field report, etc.);*
   c. *Vehicle owner or fleet name (and fleet contact person), 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". See enclosure 1, Data Collection Disc, for a pre-formatted table that provides further details regarding this submission.

The enclosed DVD contains a Microsoft Excel file entitled "REQUEST NUMBER TWO DATA" which provides the requested information. Separate tabs are provided for consumer complaints, field reports, and lawsuits. Field reports are identified as dealer field reports, non-dealer field reports, and FTIRs.

The information sources for this request are SMAI CRM database records and SMC electronic data storage records. The last date that information was gathered to respond to this request is May 22, 2020.

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 Suzuki used for organizing the documents. Describe in detail the search methods and*

search criteria used by Suzuki to identify the items in response to Request No. 2.

SMAI is responding to this request by providing a file folder entitled "REQUEST NUMBER TWO DOCUMENTS" on the enclosed DVD. This folder includes individual subfolders containing consumer complaint reports, dealer field reports, non-dealer field reports, FTIRs (and associated attachments), and lawsuits. The consumer complaints and dealer field reports exist primarily as electronic database records which cannot be easily provided as electronic or hard copy "reports". As a result, SMAI is providing reports for these categories in a standardized report format that is available in SMAI's CRM system. For FTIRs that reference attachments, copies of the attachments are also provided. For consumer complaints, field reports, and field report attachments, the documents provided are identified using the identifier in the "REQUEST NUMBER TWO DATA" file.

To identify the items provided in the response to Request No. 2, SMAI searched for all database records for affected and peer vehicles. The identified records were then individually reviewed to determine whether they relate to, or may relate to, the alleged defect.

The last date that information was gathered to respond to this request is May 23, 2020.

5. *State, by model and model year, a total count for all of the following categories of claims, collectively, that have been paid by Suzuki to date that relate to, or may relate to, the alleged defect in the subject and peer vehicles: warranty claims; extended warranty claims; claims for good will services that were provided; field, zone, or similar adjustment 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. *Suzuki'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." See Enclosure 1, Data Collection Disc, for a pre-formatted table that provides further details regarding this submission.

The table below provides a total count, by model year, of the requested categories of claims that relate to, or may relate to, the alleged defect in the subject and peer vehicles.

The enclosed DVD contains a Microsoft Excel file entitled "WARRANTY DATA" which provides the requested claim details. SMAI is unable to provide the information requested in items (l.) and (m.) because SMAI's dealers are not required to submit copies of repair orders.

The information source for this request is SMAI warranty records. The last date that information was gathered to respond to this request is May 22, 2020.

Model Year	Number of Claims		
	Regular	Good Will	Extended
2018	36	1	0
2019	0	0	0

6. *Describe in detail the search methods and search criteria used by Suzuki 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 Suzuki 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 Suzuki 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.

To respond to Request No. 5, SMAI identified all warranty claims for the subject and peer vehicles that identify one of the following parts as the failed part:

35100-20K30	**Headlamp assembly**
35100-20K31	**Headlamp assembly**
35179-20K00	**Cover (rubber cap behind bulb)**
09471-12060	**Bulb**

The enclosed DVD contains a file folder entitled "WARRANTY POLICY AND CODES" which contains a copy of the warranty policy and information about complaint codes, defect codes, labor operation codes, and diagnostic trouble codes applicable to the subject and peer vehicles. Diagnostic trouble codes are typically only included in the warranty claim records if the dealer includes this information in their written comments.

The new vehicle warranty coverage offered by Suzuki for the subject and peer vehicles (both model years) extends for 12 months with unlimited mileage. The new vehicle limited warranty covers all components other than the emission control systems, and parts and accessories, which are covered by separate warranties. SMAI also offers an extended warranty through a third-party vendor. This program is administered entirely by the third-party vendor and SMAI does not have information about the contracts issued under this program. The vendor has informed SMAI that the numbers of extended warranty contracts that have been issued for the subject and peer vehicles are as shown below, but has not provided information about the coverage options that were selected.

The data source for this request is SMAI warranty records. The last date that information was gathered to respond to this request is May 22, 2020.

Model Year	Number of Contracts
2018	180
2019	126

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 Suzuki 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 Suzuki is planning to issue within the next 120 days.*

SMAI has not issued any service, warranty, or other documents that relate to, or may relate to, the alleged defect in the subject vehicles, to any dealers, regional or zone offices, field offices, fleet purchasers, or other entities. SMAI is not planning to issue any such communications within the next 120 days.

9. *Describe all modifications or changes made by or on behalf of Suzuki (e.g., by a supplier) in the design, material composition, manufacture, quality control, supply, or installation of the subject motorcycles, from the start of production to date, which relate to, or may relate to, the alleged defect. 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 Suzuki is aware of which may be incorporated into vehicle production within the next 120 days.

Following is a description of all modifications or changes made in the *design, material composition, manufacture, quality control, supply or* installation of the subject motorcycles, from the start of production to date, which relate to, or may relate to the alleged defect.

Headlamp Assembly Design Change

a. **This change was incorporated into vehicle production on February 27, 2018.**
b. **The retaining plate of the bulb spring was changed from a round washer to a non-rotating plate, and the shape of the reflector was changed to allow the non-rotating plate to be attached.**
c. **This change was made to improve serviceability of the headlamp bulb. The holding part of the bulb spring had a structure that allowed the bulb spring to become displaced from its proper mounting position when the bulb spring is removed from the holding claw to replace the bulb.**
d. **The part number of the original component is 35100-20K30.**
e. **The part number of the modified component is 35100-20K31.**
f. **The original component was withdrawn from sale by SMAI on October 16, 2018.**
g. **The modified component was made available as a service component in September 2018.**
h. **The modified component can be interchanged with the earlier production components.**

SMC has no plan for any further modification or change to the subject component.

Information to respond to this request was provided by SMC's Motorcycle Design Department. The last date that information was gathered to respond to this request is May 22, 2020.

11. *State the number of each of the following that Suzuki 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 cut-off date for sales, if applicable):*
    a. *Subject component; and*
    b. *Any kits that have been released, or developed, by Suzuki 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 Suzuki is aware that contain the identical component, whether installed in production or in service, and state the applicable dates of production or usage.

The enclosed DVD contains a Microsoft Excel file entitled "PARTS SALES" which provides the requested sales information for each component part. Headlamp assembly part number 35100-20K30 was made unavailable by SMAI on October 16, 2018. Only the headlamp bulb (part number 09471-12060) is used in other models. There are a number of different Suzuki model and model year motorcycles that use the 09471-12060 headlamp bulb. Some of these models are: GW250, AN400/650, DR-Z400S/SM, DR650SE, GSX600/750F, SV650, LS650, VL800/1500, VLR1800, VZ800/1500, VZR1800, etc.

Supplier information for the component parts is provided below.

Headlamp assembly (part numbers 35100-20K30 and 35100-20K31)

Chongqing Jiali Jianqiao Lighting Co., Ltd
No. 11, Chuangye Road, Shuangfu Street office, Jiangjin District, Chohngquing
Contact: Yuminghuang, Chairman
Telephone: [redacted]

Cover (part number 35179-20K00)

Wenzhou Jufeng Sealing Element Co.,Ltd
NO.317, Longqing Road, Liandu District ,LiShui,ZheJiang, China
Contact: Zhangzhongyou, Supply Manger
Telephone: [redacted]

Headlamp Bulb (part number 09471-12060)

Lumileds (Shanghai) Management Co., Ltd
NO.19-20, Lane 299, Wenshui Road, JingAn District, Shanghai, P.R.China
Contact:Tom Dong, Customer Quality Manger
Telephone: [redacted]

The information source for this request is SMAI parts sales records. Supplier information was provided by SMC's Motorcycle Design Department. The last date that information was gathered to respond to this request is May 22, 2020.

SMAI's response is based on searches of documents where information responsive to the agency's request would normally be found, as well as consultation with personnel who could reasonably be expected to have such information. Consequently, the searches conducted by Suzuki did not include "... all of its past and present officers and employees, whether assigned to its principal offices or any of its field or other locations, including all of their divisions, subsidiaries (whether or not incorporated) and affiliated enterprises and all of their headquarters, regional, zone and other offices and their employees, and all agents, contractors, consultants, attorneys and law firms and other persons engaged directly or indirectly (e.g., employee of a consultant) by or under the control of Suzuki (including all business units and persons previously referred to)..."

Sincerely,

SUZUKI MOTOR OF AMERICA, INC.

[redacted]

Kenneth M. Bush
Department Manager, Government Relations