

HONDA

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

July 1, 2022

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

Re: EA21-002/NEF-102pub

Dear Dr. Ridella:

In reply to your letter dated May 23, 2022, informing us that you have opened an Engineering Analysis and requesting certain information in support of your investigation into whether a safety defect related to propellant degradation exists in non-recalled desiccated phase-stabilized ammonium nitrate (PSAN) frontal air bag inflators manufactured by Takata installed in certain vehicles manufactured by American Honda Motor Co., Inc. (Honda), we submit the following responses and attachments using information obtained from various sources, including the Takata SGO 2015-01A and ongoing -X monitoring activity.

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

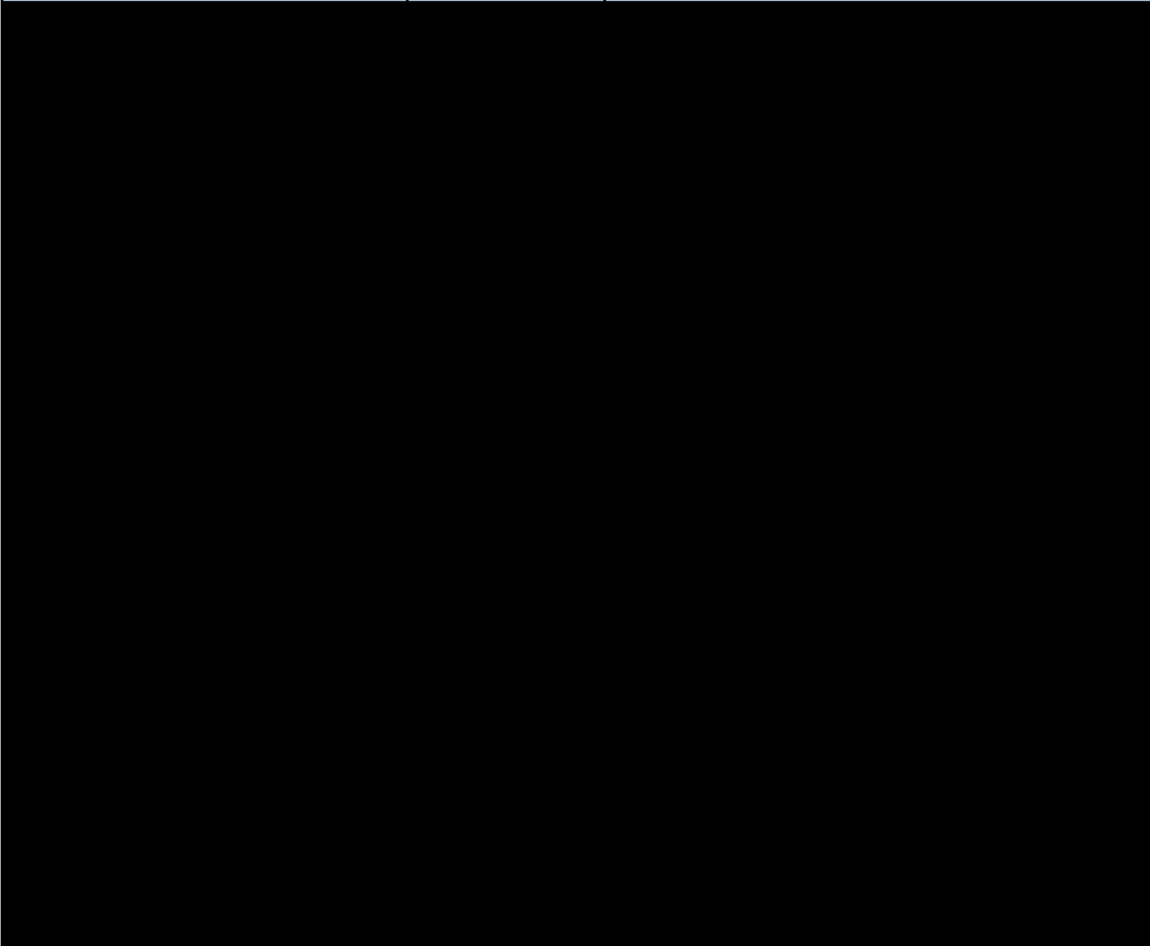
Should any questions arise after either submission, please feel free to contact Honda.

- 1. State, by model and model year, the number of subject vehicles (excluding vehicles remedied under a subject recall action) 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. Make;**
 - b. Model;**
 - c. Model year;**
 - d. Module position (Driver or Passenger);**
 - e. Inflator prefix;**
 - f. Inflator type;**
 - g. Main propellant (2004 or 2004L);**
 - h. Desiccant type;**
 - i. Booster material; and**
 - j. Auto-ignition material;**

A pre-formatted data collection file, in which you should submit your response, will be provided to you.

ENTIRE PAGE CONFIDENTIAL BUSINESS INFORMATION

Response:

Model	Model Year	Number of Units Manufactured (excluding vehicles remedied under a subject recall action)
		

Note: Production data represents maximum counts based on current information available.

For data elements "a" through "j", please see folder R1, "R1_070122_REDACTED.xlsx" in the attached .zip file.

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2. For all subject vehicles identified in Request No. 1, provide the following information.
- Vehicle identification number (17-character VIN);
 - Make;
 - Model;
 - Model year;
 - Date of manufacture (MM/DD/YYYY); and
 - The state (postal abbreviation) in the United States including, but not limited to, the District of Columbia, and current U.S. territories and possessions 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:

For data elements "a" through "k", please see folder R2, "PRODUCTION DATA" in the attached .zip file.

3. Provide the following information for each subject recall action conducted by Honda in the United States, including, but not limited to, the District of Columbia, and current U.S. territories and possessions. Separately, for each subject recall action to date, state the following:
- Make;
 - NHTSA recall ID;
 - Recall status active (Yes) or closed/superseded (No);
 - Remedy inflator group ID;
 - Number of remedy repairs performed using the subject component; and
 - Subject component currently being used for remedy repairs (Yes or No)

A pre-formatted data collection file, in which you should submit your response, will be provided to you.

Response:

For data elements "a" through "k", please see folder R3, "R3_070122_ REDACTED.xlsx" in the attached .zip file.

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4. For each remedy inflator group identified in Request No. 3, provide the following information.
- a. Remedy inflator group ID;
 - b. Module position (Driver or Passenger);
 - c. Inflator prefix;
 - d. Inflator type;
 - e. Main propellant (2004 or 2004L);
 - f. Desiccant type;
 - g. Booster material;
 - h. Auto-Ignition material; and
 - i. Total number of inflators that were purchased.

A pre-formatted data collection file, in which you should submit your response, will be provided to you.

Response:

For data elements "a" through "i", please see folder R4, "R4_070122_ REDACTED.xlsx" in the attached .zip file.

5. List all reports and/or allegations of a field rupture of the subject component. For each reported allegation, provide:
- a. Make;
 - b. Model;
 - c. Model year;
 - d. Vehicle identification number (17-character VIN);
 - e. State;
 - f. Vehicle build date;
 - g. Module position (Driver or Passenger);
 - h. Inflator serial number;
 - i. Inflator build date;
 - j. Inflator type;
 - k. Incident date;
 - l. Description of incident;
 - m. Injury (Yes/No);
 - n. Fatal (Yes/No); and
 - o. Description of injuries.

Provide the table in Microsoft Access 2010, or a compatible format, entitled "REQUEST NUMBER FIVE DATA."

Response:

For data elements "a" through "o", please see folder R5, "REQUEST NUMBER FIVE DATA" in the attached .zip file.

ENTIRE PAGE CONFIDENTIAL BUSINESS INFORMATION

6. List all past, currently active, and/or any planned future field collection activities conducted/being conducted/to be conducted by or on behalf of Honda of the subject component. Separately, for each field collection activity conducted to date, provide the following information.
- a. Any entities that assisted with the field collection activity;
 - b. All make, model, model year vehicles included in the field collection activity;
 - c. Inflator type(s);
 - d. Inflator prefix(s);
 - e. Geographic area of collected parts;
 - f. Field age range of collected parts;
 - g. Number of parts targeted;
 - h. Number of parts collected; and
 - i. Rationale for selecting targeted population. (i.e. investigating field incident, abnormal laboratory test result, legal claims, production quality concerns, etc.)

Response:

For data elements "a" through "i", please see folder R6, "R6_070122_ REDACTED.xlsx" in the attached .zip file.

7. List all past, currently active, and/or any planned testing and analysis activities conducted/being conducted/to be conducted by or on behalf of Honda of the subject component. Separately, for each testing and analysis activity conducted to date, provide the following information.
- a. All parties, including third parties, involved with the identified testing activity.
 - i. A description of each party's role in the identified testing activity.
 - b. All field collection activity(s) associated with each testing activity.
 - c. Details on laboratory testing associated with each testing activity, including but not limited to:
 - ii. Use of field collected or specifically prepared (not production units) inflators;
 - iii. All dissection and internal inflator component analysis;
 - iv. All ballistic testing including any propellant burn rate analysis;
 - v. All accelerated exposure testing (e.g., chamber cycling);
 - vi. All controlled field exposure testing (e.g., parking lot exposure); and
 - d. Any interim or final reports/results generated from the testing activity.

Response:

For data elements "a" through "d", please see folder R7-8, "R7_070122_ REDACTED.xlsx" in the attached .zip file.

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- 8. Provide the current service life estimate for each subject component (listed by inflator prefix) identified in response to Requests No. 1 and No. 4. For each service life estimate provided, include the following.**
- a. A detailed description of the data, report, test activity, predictive modeling, or other information and analysis that provides the basis for the service life estimate. Include copies of all documents related to the basis for the estimate.**
 - b. A detailed description of all current and/or planned testing, analysis, and/or predictive modeling activities being conducted for the purpose of establishing or updating your understanding of the service life of the subject component. Your description should include, but not be limited to:**
 - i. All controlled field exposure testing (e.g., parking lot exposure); and**
 - 1. The identification of all parties, including third parties, involved with the identified activity, including a description of each party's role in the identified activity.**
 - 2. The actual or planned start date and end date for each identified activity.**
 - 3. The identification and description of specific activities associated with each service life estimate determination.**

Response:

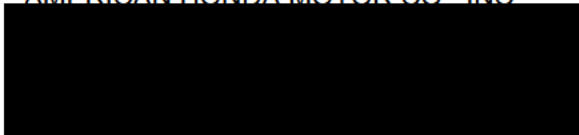
Please see "R8_70122_REDACTED.xlsx" and responsive supplements in folder R7-8 of the attached .zip file.

- 9. For any inflator types identified in response to Requests No. 1 and/or No. 4, state whether you have or are developing a program to replace the inflators in subject vehicles. If yes, identify for which inflator type(s), the status of the program, and projected completion of each program.**

Yes, we have developed a program and this is detailed in the attached file "R9_070122_REDACTED" found in folder R9 of the attached .zip file.

Respectfully,

AMERICAN HONDA MOTOR CO., INC.



Jeff Chang
Senior Manager
Product Regulatory Office

JHC:bi

cc: Bruce York, NHTSA
Sharon Yukevich, NHTSA
Office of Chief Counsel, NHTSA

Attachments