

HONDA

American Honda Motor Co., Inc.
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April 22, 2022

Sharon Yukevich
Acting Division Chief – Defect Division A
Office of Defects Investigation
U.S. Department of Transportation
National Highway Traffic Safety Administration
1200 New Jersey Ave., SE
Washington, DC 20590

Re: NEF-101sly (PE22-001)

Dear Ms. Yukevich,

In reply to the letter dated February 28, 2022, Honda is submitting this response regarding your investigation of allegations of tailgate wire harness damage leading to failure of the rear-view camera in 2017-2018 Model Year (MY) Ridgeline vehicles distributed by American Honda Motor Co., Inc.

Should you have any questions, please feel free to contact Honda.

Respectfully,

AMERICAN HONDA MOTOR CO., INC.



Jeff Chang
Senior Manager
Product Regulatory Office

JC:tk

cc: Office of Chief Counsel, NHTSA
Michelle Jongkind, Honda

Enclosure

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) (17-characters);
 - b. Make;
 - c. Model;
 - d. Model Year;
 - e. Subject component part number and design version installed as original equipment;
 - f. Date of vehicle manufacture (MM/DD/YYYY);
 - g. Date vehicle warranty coverage commenced (MM/DD/YYYY); and
 - h. The State in the United States where the vehicle was originally sold or leased or delivered for sale or lease (postal abbreviation).

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

Response:

The number of Subject Vehicles Honda has manufactured for sale or lease in the United States:

Source	CoreMQ (Honda database for market analysis)
Last date the information was gathered	3/9/2022

Model	MY	Number of vehicles manufactured for sale or lease in the US
Ridgeline	2017	
Ridgeline	2018	

For the production data, including items "a" through "h", please see the included file:

- "PE22-001 – Honda IR Letter Response - R1 (PRODUCTION DATA) - CONFIDENTIAL.xlsx"

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. Reports involving a fire;
 - e. Property damage claims; and
 - f. Third-party arbitration proceedings, both pending and closed, where Honda is or was a party to the arbitration; and
 - g. Lawsuits, both pending and closed, in which Honda 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 Honda’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:

For a table of the counts of the items in categories “a” through “g” and the additional information requested, please see the included file titled:

- *“PE22-001 – Honda IR Letter Response – R2 (Complaint Counts) – CONFIDENTIAL.xlsx”*

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 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), email address and telephone number (please use distinct fields for each data type);
 - d. Vehicle owner or fleet street address, city, state (postal abbreviation), and ZIP code (please use distinct fields for each data type);
 - e. Vehicle's 17-character VIN;
 - f. Vehicle's make, model, and model year (please use distinct fields for each data type);
 - g. Vehicle's mileage at time of incident;
 - h. Incident date (MM/DD/YYYY);
 - i. Report or claim date (MM/DD/YYYY);
 - j. Whether a crash is alleged;
 - k. Whether a fire is alleged;
 - l. Whether property damage is alleged;
 - m. Number of alleged injuries, if any; and
 - n. Number of alleged fatalities, if any.

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

Response:

For the table of complaints with items "a" through "n", please see the included file titled:

- "PE22-001 – Honda IR Letter Response – R3 (REQUEST NUMBER TWO DATA) – CONFIDENTIAL.xlsx"

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:

For the copies of complaints, please see the included files titled:

- *“PE22-001 - MacTavish Class Action Complaint.pdf”*
- *“PE22-001 - techline reports - CONFIDENTIAL .pdf”*
- *“PE22-001 - field reports - CONFIDENTIAL.pdf”*
- *“PE22-001 - ACS cases - CONFIDENTIAL.xlsx”*

Detailed description of the search method and criteria used to identify the items in response to Request No. 2:

Acura Client Relations cases were searched using the following criteria:

- *2017 or 2018 Ridgeline*
- *Keywords: camera AND rear, back, tail*
- *Keywords: tailgate, tail gate AND harn, wire, wiring*

The cases which were found using the above filters were then individually reviewed to find the cases that may relate to the Alleged Defect.

*The Field Report search was conducted by looking in the "vehicle_complaint", "vehicle_problem_cause", "vehicle_corrective_action" & "brief_description" fields in the reports, for reports that may apply to the Alleged Defect. In these fields, key words (TAIL, S*GATE, HARN, WIRE, WIRI) were used to search for cases that may have some relation to the Alleged Defect. Further filtering of the cases was done to capture rear view camera issues by using key words REAR, BACK, TAIL & CAMERA. Cases with the tailgate harness part number (32109*) were also searched. Once a grouping of field reports were compiled, the cases were reviewed to confirm if the case is or may be related to the Alleged Defect.*

***The Tech Line case search was conducted by looking in the "techline_case", "techline_notes" and "techline_complaint" tables. Rear view camera related cases were searched using the "cp.complaint_code" of 9700, 9701, 9702 or 9703, which relate to the rear view camera. Within the cases, the text fields for "solution", "complaint_short_description", "complaint_long_description" & "dealer_note_text" were searched for cases that may relate to the Alleged Defect. In these fields, key words (HARN, HNS, WIRING, WIRE, OR C703) were used to search for cases that may have some relation to the Alleged Defect. Also, any comments that indicated that the issue is not related to the Alleged Defect or is related to a pin/connector issue (as opposed to the harness) were filtered out using a SQL script.*

For legal claims and lawsuits received by American Honda Motor Co., Inc., a search was done in ALMA (legal database) to include all matters (claims, lawsuits, property damage, class actions etc.) using the following criteria:

- *2017 or 2018 Ridgeline*
- *Component Code 28 or 11, which covers rear view camera and wire harness allegations.*

Matters that matched the search criteria were manually reviewed to determine if they involved the Alleged Defect.

*** Tech Line "case" is the documented information from a contact from a dealership technician to American Honda requesting assistance in diagnosing a technical issue on a vehicle that has come into the dealership for service. The typical caller into Tech Line is a dealership technician working on repairing a vehicle (not the consumer/customer). The Tech Line case documents the basic information on the contact from the dealership including problem description, suggested diagnostics, potential repair direction, etc.*

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 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. Honda's claim number;
- b. Vehicle owner or fleet name (and fleet contact person), email address and telephone number (please use distinct fields for each data type);
- c. Vehicle owner or fleet street address, city, state (postal abbreviation), and ZIP code (please use distinct fields for each data type);
- d. Vehicle's 17-character VIN;
- e. Repair date (MM/DD/YYYY);
- f. Vehicle mileage at time of repair;
- g. Repairing dealer's or facility's name, telephone number, city and state or ZIP code (please use distinct fields for each data type);
- h. Labor operation number(s);
- i. Problem code(s);
- j. Diagnostic trouble code(s);
- k. Replacement part number(s) and description(s);
- l. Concern stated by customer;
- m. Cause as stated on the repair order;
- n. Correction as stated on the repair order; and
- o. 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:

For the warranty data, please see the included file titled:

- "PE22-001 – Honda IR Letter Response – R5 (WARRANTY DATA) – CONFIDENTIAL.xlsx"

- 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.

Response:

Honda conducted the warranty search using 2017 & 2018 Model Year Ridgeline with a “replaced part number” of 32109-T6Z-A00. The data was searched for the US and the US Territories.

- 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.

Response:

Labor operation codes and problem codes listed in the table below appear in the warranty data that was captured in the warranty search as described in the response to request number 6 above. No Diagnostic Trouble Codes are involved with the Alleged Defect.

Labor Op	Labor Op Description	Problem Code	Problem Code Description

- 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 Coverage offered by American Honda on subject vehicles:

- 3 years/36,000 miles

For the extended warranty coverage data, please see the included file titled:

- “PE22-001 – Honda IR Letter Response – R8 (EXTENDED WARRANTY DATA) – CONFIDENTIAL.xlsx”

9. Produce copies of all service, warranty, and other documents that 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, except for standard shop manuals. Also include the latest draft copy of any communication that Honda is planning to issue within the next 120 days.

Response:

No documents to produce. There has not been any communication on the subject Alleged Defect and currently there are no plans within the next 120 days for such communication.

10. Describe in detail the specifications of the Subject Component including but not limited to what components and/or systems are connected to the Subject Component and what the Subject Component connects to.

Response:

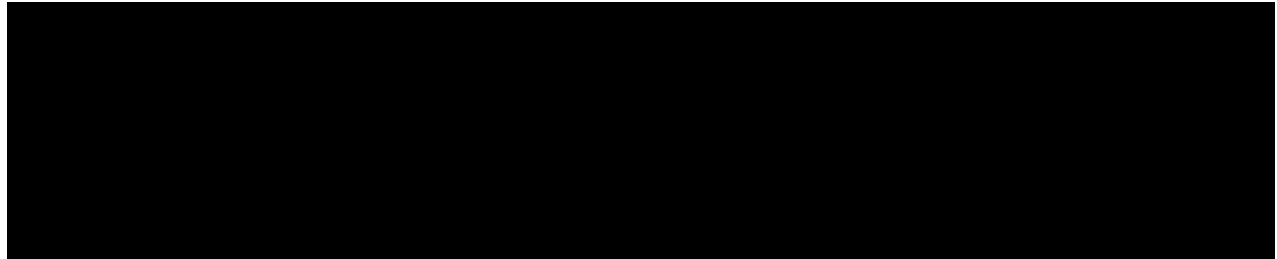
The main component involved with the Alleged Defect is the tailgate wiring harness. The drawing and specifications for the tailgate wiring harness are in the below listed included files. The tailgate harness is attached to the rear view camera on one end and another wiring harness on the other end.

- “Component Specifications Overview Summary - CONFIDENTIAL.xlsx”
- “Rear View Camera Drawing - CONFIDENTIAL.jpg”
- “Tailgate Wire Harness drawing - CONFIDENTIAL.pdf”
- “Wire Harness Specifications - CONFIDENTIAL.pdf”

11. Describe in detail the differences in the Subject Component design, material composition, and vehicle installation between the Subject Vehicles and subsequent model year versions of the Honda Ridgeline vehicle.

Response:

Listed below are the changes to the tailgate harness from the Subject Vehicles to the subsequent model year version Ridgeline.



Please see the included files listed below for a summary of the changes and the drawings for each of the parts.

- *“Tailgate wiring harness change history summary - CONFIDENTIAL.xlsx”*
- *“2017-2018 tail gate harness drwg - CONFIDENTIAL.pdf”*
- *“2019 tail gate harness drwg - CONFIDENTIAL.pdf”*
- *“2019 tail gate harness drwg added note - CONFIDENTIAL.pdf”*

12. 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, 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.

Response:

The below included file summarizes the documents related to request number 12. The information is in a table format with items "a" through "f" included.

- *"Request number 12 related document summary – CONFIDENTIAL.xlsx"*

Also included are the following documents summarized in the above mentioned table:

- *"2KM Tailgate Bend Test TS TR233720 - CONFIDENTIAL.pdf"*
- *"2KM - Test Conclusion - CONFIDENTIAL.pdf"*
- *"Z4F181025001 - CONFIDENTIAL.pdf"*
- *"QIS HNA18071902 20220408 - CONFIDENTIAL.pdf"*
- *"QIS HNA19121302 20220408 - CONFIDENTIAL.pdf"*
- *"17-18M Ridgeline TG Harness_20220413 - CONFIDENTIAL.pdf"*

13. 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 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:
- The date or approximate date on which the modification or change was incorporated into vehicle production;
 - A detailed description of the modification or change;
 - The reason(s) for the modification or change;
 - The part number(s) (service and engineering) of the original component;
 - The part number(s) (service and engineering) of the modified component;
 - Whether the original unmodified component was withdrawn from production and/or sale, and if so, when;
 - When the modified component was made available as a service component; and
 - 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:

For the tailgate wire harness change history, please see the included file titled:

- *“tailgate wire harness change history - CONFIDENTIAL.xlsx”*

14. State the number of each of the following that Honda 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):
- Subject component; and
 - Any kits that have been released, or developed, by Honda 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 Honda 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:

For part sales data, please see the included Excel file titled:

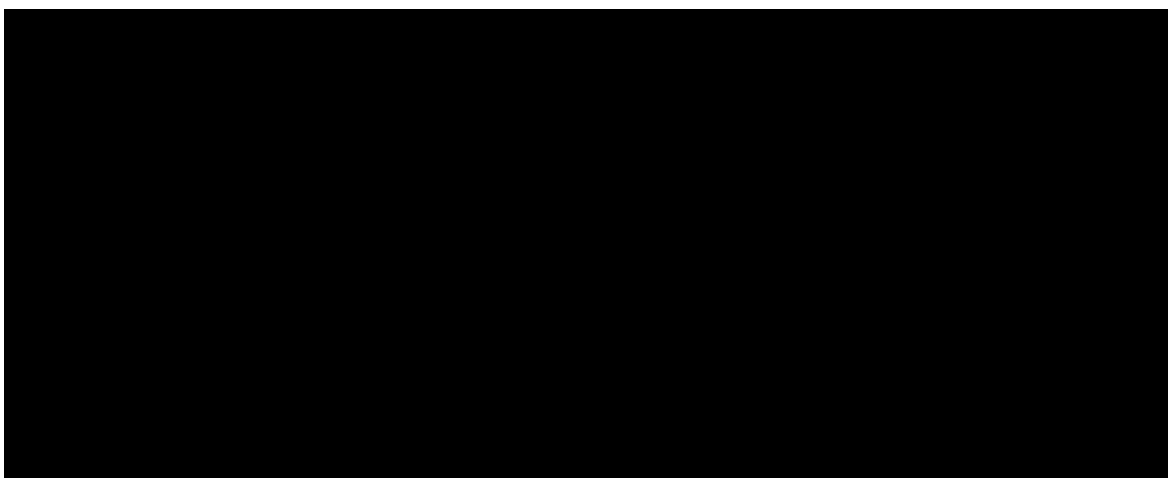
- *“PE22-001 – Honda IR Letter Response – R14 (PART SALES DATA) – CONFIDENTIAL.xlsx”*

15. Furnish Honda's assessment of the Alleged Defect in the Subject Vehicles, including:

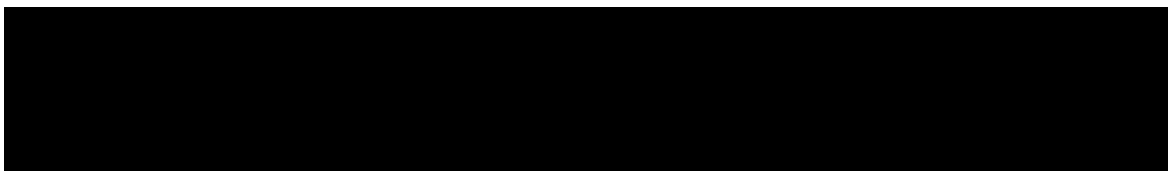
- a. The causal or contributory factor(s);
- b. The failure mechanism(s);
- c. The failure mode(s);
- d. The risk to motor vehicle safety that it poses; and
- e. What warnings, if any, the operator, and the other persons both inside and outside the vehicle would have that the Alleged Defect was occurring, or Subject Component was malfunctioning; and
- f. The reports included with this inquiry.

Response:

- a. *The causal or contributory factor(s);*



- b. *The failure mechanism(s);*



- c. *The failure mode(s);*

Loss of electrical continuity on the RVC electrical circuit results in the RVC image not being displayed on the infotainment screen.

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

When the Alleged Defect occurs, the infotainment screen display will be blank (black). The failure condition will be obvious and easily detectable by the driver.

f. The reports included with this inquiry.

The reports included with this inquiry show the investigation conducted relative to the Alleged Defect and summarizes the potential root causes found. The root causes were found to be process/quality control related and thus countermeasures were implemented to the supplier process/quality control and no design change to the wiring harness was made or required.