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

December 19, 2023

Sharon Yukevich
Division Chief – Vehicle 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-101Ik (PE22-005) – Response to Supplemental Information Request ID PE22005-02

Dear Ms. Yukevich,

In reply to the letter dated November 3, 2023, Honda is submitting this response regarding your investigation of certain 2016-2020 Model Year (MY) Honda Pilot vehicles manufactured by American Honda Motor Co. Inc. (Honda), focused on allegations of the engine failing to restart on its own after a complete stop at a traffic light or intersection with the Auto-Idle Stop (AIS) engaged. Should you have any questions, please feel free to contact Honda.

Respectfully,

AMERICAN HONDA MOTOR CO., INC.

[redacted]
Michelle Jongkind
Manager
Product Regulatory Office

MJ:tk

cc: Office of Chief Counsel, NHTSA

1. State, by model and model year, the number of subject and peer 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).
   i. If the first level countermeasure (software update) was applied to the vehicle, date of application
   j. If the second level countermeasure (Hardware repairs) was applied to the vehicle, date of application

   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: (note: the vehicle population did not change from the response to the previous IR letter)

Source	[redacted]
Date the information was gathered	

Model	MY	Number of vehicles manufactured for sale or lease in the US
Honda Pilot	2016	[redacted]
Honda Pilot	2017	
Honda Pilot	2018	
Honda Pilot	2019	
Honda Pilot	2020	
Honda Odyssey	2015	
Honda Odyssey	2016	
Honda Odyssey	2017	
Honda Odyssey	2018	
Honda Odyssey	2019	
Honda Odyssey	2020	
Acura TLX	2015	

Acura TLX	2016	[redacted]
Acura TLX	2017	
Acura TLX	2018	
Acura TLX	2019	
Acura TLX	2020	
Acura MDX	2015	
Acura MDX	2016	
Acura MDX	2017	
Acura MDX	2018	
Acura MDX	2019	
Acura MDX	2020	

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

- *"PE22-005 – Honda Supplemental 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 or peer**:

   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; and
   e. Third-party arbitration proceedings, both pending and closed, where Honda is or was a party to the arbitration; and
   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 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:

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

- *"PE22-005 – Honda Supplemental 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 Identification Number (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 property damage is alleged;
   l. Number of alleged injuries, if any; and
   m. Number of alleged fatalities, if any.
   n. If the first level countermeasure (software update) was applied to the vehicle, date of application
   o. If the second level countermeasure (Hardware repairs) was applied to the vehicle, date of application

   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 "o", please see the included file titled:
- *"PE22-005 – Honda Supplemental 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:
- *"PE22-005-2 - Legal cases combined - CONFIDENTIAL.pdf"*
- *"PE22-005-2 - techline reports - CONFIDENTIAL .pdf"*
- *"PE22-005-2 - field reports - CONFIDENTIAL.pdf"*
- *"PE22-005-2 - customer relations cases - CONFIDENTIAL .pdf"*

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

Client Relations cases were first searched using the following criteria:

- *Subject or peer vehicle model/MY*
- *Keywords: Vehicle, Car, Engine **AND** doesn't restart, doesn't automatically restart, doesn't start, won't restart, won't automatically start, won't start, will not restart, will not start, wouldn't restart, wouldn't automatically restart, stall, stalled, failed to restart, turned off*

From the data captured from the above first filter, then an additional filtering was performed using the keyword "idle". The cases which were found using the above filters were then individually reviewed to find the cases that relate to or 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 for all field reports that are for the subject and peer vehicles. In these fields, key words/strings (idle, stop, start, red light, start, died, auto idle, auto stop, and idle stop) were used to search for cases that may have some relation to the Alleged Defect. Once a grouping of field reports were compiled, the cases were reviewed to confirm if the case is related to or may relate to the Alleged Defect.

***The Tech Line case search was conducted for each model/MY of subject and peer vehicles, by looking in the "techline_case", "techline_notes" and "techline_complaint" tables. Alleged defect related cases were searched using the "cp.complaint_code" of "182%", which relates Idle related issues, including "Auto Idle Stop", or "cp.complaint_code" of "P15C4%", which relates DTC for Auto Idle Stop. Within the cases, the text fields for "solution", "complaint_short_description", "complaint_long_description", "specialist_note_text" & "dealer_note_text" were searched for cases that may relate to the Alleged Defect. In these fields, key words/strings (idle, stop, start, red light, start, died, auto idle, auto stop, and idle stop) were used to search for cases that may have some relation to the Alleged Defect. Once a grouping of Tech Line cases were compiled using the above described method, the cases were reviewed to confirm if the case is related to or may relate to the Alleged Defect.*

For legal claims and lawsuits received by American Honda Motor Co., Inc., a search was performed of all claims, lawsuits and arbitrations in our internal matter management system involving the subject and peer vehicle models and all product allegation codes. We then reduced the scope to the subject and peer vehicles and all product allegation codes relating to engines. We then eliminated product allegation codes that related to engine noise and engine wear. We then manually reviewed each individual case in the remaining population by reviewing the case narrative and other case documents to determine if it relates to, or may relate to, the Alleged Defect. Where we could not definitively determine that a matter involved an allegation of the Alleged Defect, but could not rule out the possibility, we included the matter in the count.

*** 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. 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 design and validation of the countermeasure action utilized in the Honda campaigns listed in question 6. For each such action, provide the following information:

    a. Action title or identifier;
    b. Summary of the subject and objective of the action;
    c. Engineering group(s)/supplier(s) responsible for designing and for conducting the action; and
    d. A 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 10. The information is in a table format with items "a" through "d" included.

- *"Request number 5 related document summary – CONFIDENTIAL.xlsx"*

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

- *"20230901 AIS No Restart Update - CONFIDENTIAL.pdf"*
- *"AIS_DV-caravan_211021PR - CONFIDENTIAL.pdf"*
- *"QIS AH18091302 - CONFIDENTIAL.pdf"*
- *"TLX IS Restart MM_NP0-9AT_MASK_20220825_02 - CONFIDENTIAL.pdf"*
- *"TLX IS Restart MM_NP0-10AT_MASK_20220908_01 - CONFIDENTIAL.pdf"*

6. Provide completion rates for the following Honda campaigns
    a. 22-008---2015-20 TLX PGM-FI Idle Stop software update countermeasure
    b. 22-009---2015-20 TLX hardware repairs countermeasure
    c. 23-001---2016-20 Acura MDX-FI Idle Stop software update countermeasure
    d. 23-002---2016-20 Acura MDX hardware repairs countermeasure
    e. 23-008---2019-22 Honda Passport-FI Idle Stop software update countermeasure
    f. 23-008---2016-22 Honda Pilot- FI Idle Stop software update countermeasure
    g. 23-008---2020-23 Honda Ridgeline- FI Idle software update countermeasure
    h. 23-009---2019-21 Honda Passport hardware repairs countermeasure
    i. 23-009---2016-21 Honda Pilot hardware repairs countermeasure
    j. 23-009---2020-21 Honda Ridgeline hardware repairs
    k. 23-010---2021-22 Honda Passport hardware repairs countermeasure
    l. 23-010---2021-22 Honda Pilot hardware repairs countermeasure
    m. 23-010---2021-23 Honda Ridgeline hardware repairs countermeasure

Response:

Please see the table below for the completion rates.

PUD or Warranty Extension Repair (Service Bulletin)	Completion Rate
a. 22-008---2015-20 TLX PGM-FI Idle Stop software update countermeasure	[redacted]
b. 22-009---2015-20 TLX hardware repairs countermeasure	
c. 23-001---2016-20 Acura MDX-FI Idle Stop software update countermeasure	
d. 23-002---2016-20 Acura MDX hardware repairs countermeasure	
e. 23-008---2019-22 Honda Passport-FI Idle Stop software update countermeasure	
f. 23-008---2016-22 Honda Pilot- FI Idle Stop software update countermeasure	
g. 23-008---2020-23 Honda Ridgeline- FI Idle software update countermeasure	
h. 23-009---2019-21 Honda Passport hardware repairs countermeasure	
i. 23-009---2016-21 Honda Pilot hardware repairs countermeasure	
j. 23-009---2020-21 Honda Ridgeline hardware repairs	
k. 23-110---2021-22 Honda Passport hardware repairs countermeasure	
l. 23-010---2021-22 Honda Pilot hardware repairs countermeasure	
m. 23-010---2021-23 Honda Ridgeline hardware repairs countermeasure	