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HONDA

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

August 9, 2022

Sharon Yukevich
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-1011k (PE22-005)


Dear Ms. Yukevich,

In reply to the letter dated June 17, 2022, 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.



Senior Manager
Product Regulatory Office

JC:tk

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

Enclosure

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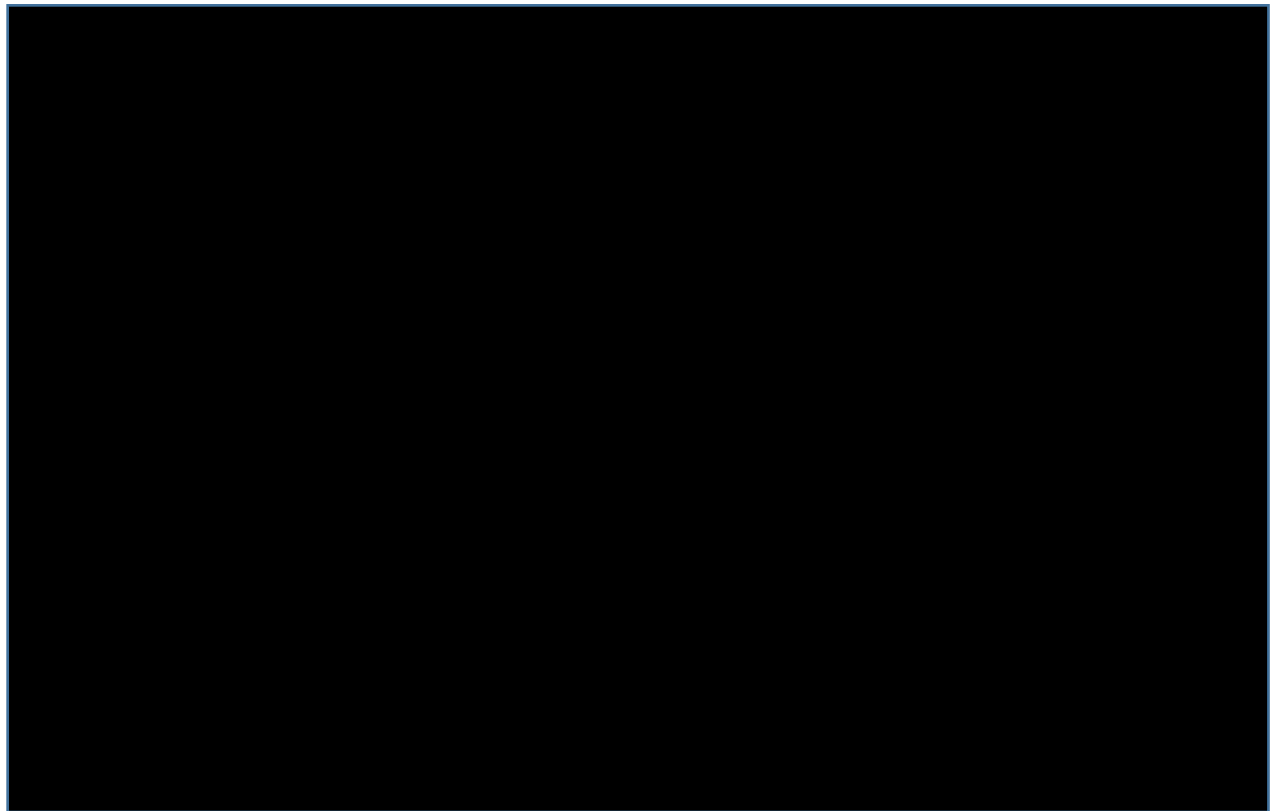
1. State, by model and model year, the number of subject and peer vehicles Honda has manufactured for sale or lease in the United States. Separately, for each subject vehicle manufactured to date by Honda, state the following:
 - a. Vehicle identification number (VIN) (17-characters);
 - b. Make;
 - 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).

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:

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

- *“PE22-005 – Honda IR Letter Response - R1 (PRODUCTION DATA) - CONFIDENTIAL.xlsx”*

NOTE: Red text for request number 1 indicates that data will be provided at a later time, per the due-date extension approved by NHTSA for this item.

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 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 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."

Response:

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

- *"PE22-005 – 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:

- *“PE22-005 - Legal cases combined - CONFIDENTIAL.pdf”*
- *“PE22-005 - techline reports - CONFIDENTIAL .pdf”*
- *“PE22-005 - field reports - CONFIDENTIAL.pdf”*
- *“PE22-005 - 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. 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 and peer 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 Identification Number (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." A pre-formatted data collection file, which provides further details regarding this submission, will be provided to you.

Response:

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

- *"PE22-005 – Honda IR Letter Response – R5 (WARRANTY DATA) – CONFIDENTIAL.xlsx"*

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.

Response:

Honda conducted the warranty search for the subject and peer vehicles equipped with auto idle stop function, using the following "failed part numbers": 31500(Battery), 31100 (alternator), 32100(engine room harness), 38920(Battery Sensor), 37820(ECU), 32410(starter cable), 31200(starter motor), 14711(Engine Valve), 12030(Engine head cover gasket set), 12341(Engine head gasket), 12310(Cylinder head), 12351(emblem cylinder head cover). Then, the resulting search result was further "manually" filtered/read to find warranty claims related to or may relate to the idle stop with no restart issue.

7. 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 and peer 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.

Response:

Labor operation code and problem code descriptions appear in the warranty data that was captured in the warranty search as described in the response to request number 6 above. In the response file to request number 5, additional columns of data have been added next to the labor operation code and problem code columns containing the requested descriptions. No particular Diagnostic Trouble Codes are involved with the Alleged Defect.

8. State, by make and model year, the terms of the new vehicle warranty coverage offered by Honda on the subject and peer 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 and peer vehicles:

- 3 years/36,000 miles (Honda vehicles)
- 4 years/50,000 miles (Acura vehicles)

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

- *“PE22-005 – 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:

For documents related to this request, please see the included files titled:

- *“Record 8 A18070D - CONFIDENTIAL.pdf”*
- *“Record 9 AER19120A - DVR-767 - CONFIDENTIAL.pdf”*
- *“Record 11 ASW17102B - CONFIDENTIAL.pdf”*
- *“Record 15 ATS180206 - CONFIDENTIAL.pdf”*
- *“Record 16 A18070D - CONFIDENTIAL.pdf”*

10. 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 or peer 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. 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 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 "f" included.

- *"Request number 10 related document summary – CONFIDENTIAL.xlsx"*

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

- *"AH18091302 - CONFIDENTIAL.pdf"*
- *"20210812 AIS No Restart - CONFIDENTIAL.pdf"*
- *"20210419 AIS No Restart - CONFIDENTIAL.pdf"*
- *"20200116 AIS No Restart - CONFIDENTIAL.pdf"*
- *"20200910 AIS No Restart Update - CONFIDENTIAL.pdf"*

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11. 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 system, 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 design change history related to the alleged defect, please see the included file titled:

- *“design change history - CONFIDENTIAL.xlsx”*

12. Furnish Honda's assessment of the alleged defect in the subject vehicles, including:

- The causal or contributory factor(s);
- The failure mechanism(s);
- The failure mode(s);
- The risk to motor vehicle safety that it poses; and
- 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
- The reports included with this inquiry

Response:

- The causal or contributory factor(s);

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b. The failure mechanism(s);

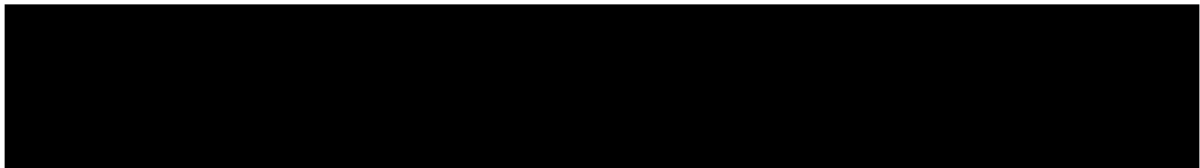
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c. The failure mode(s);

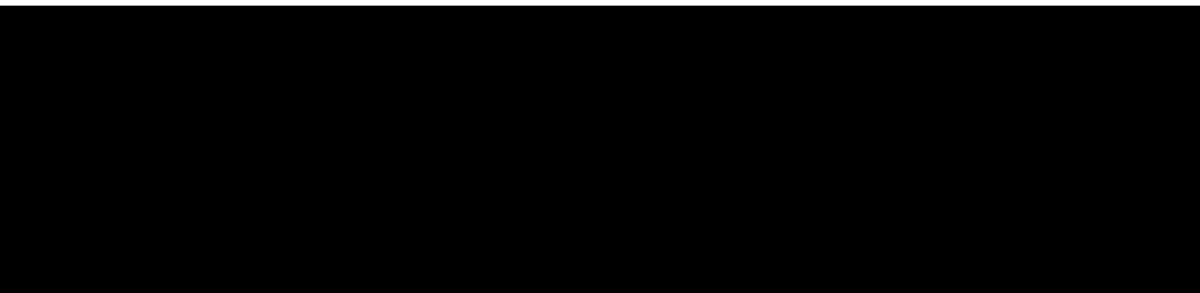
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d. The risk to motor vehicle safety that it poses; and

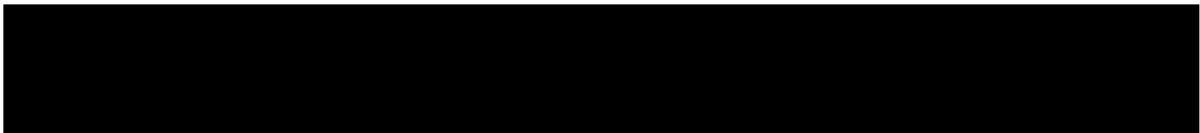
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e. What warnings, if any, the operator, and the other persons both inside and outside the vehicle would have that the Alleged Defect was occurring, or Subject Component was malfunctioning; and

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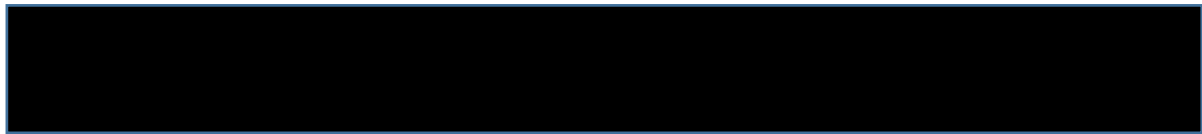


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f. The reports included with this inquiry.

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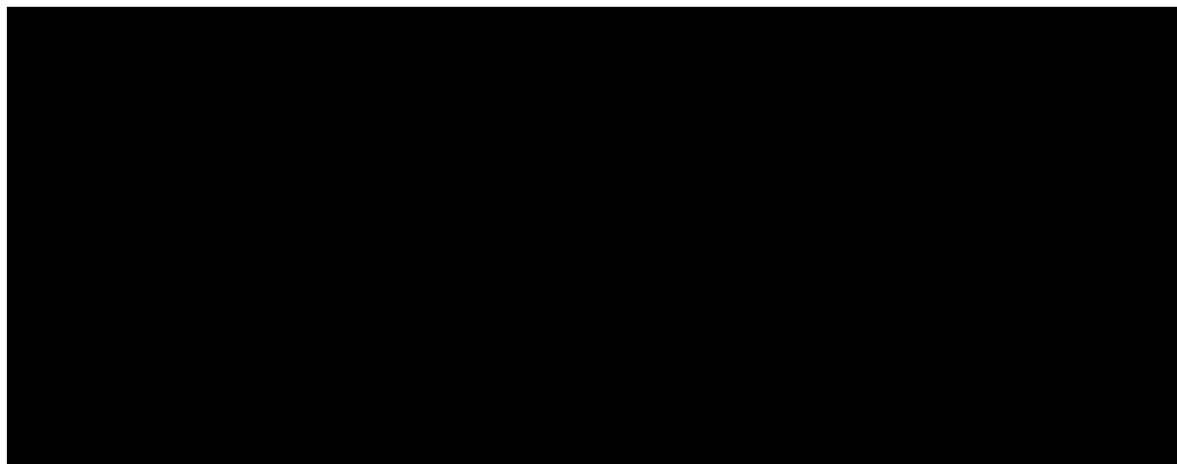


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13. Provide a detailed description of the sequence of events that lead to the ideal performance of the AIS feature for the subject and peer vehicles

Response:

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