



Kia America, Inc.  
Corporate Headquarters  
111 Peters Canyon Road, Irvine, CA 92606-1790 USA

**VIA ELECTRONIC SUBMISSION**

January 19, 2024

Alexander Ansley, Chief  
Recall Management Division  
U.S. Department of Transportation  
National Highway Traffic Safety Administration  
1200 New Jersey Avenue, S.E.  
Washington D.C. 20590

Re: **Audit Query (AQ23-002);**  
**Part 573 Defect Reports Submitted by Kia Describing Defects in Hydraulic**  
**Electronic Control Units**

Dear Mr. Ansley:

This letter is submitted in response to your letter received by Kia America, Inc. (“Kia”) on November 28, 2023 (Reference NEF-107CL/AQ23-002). That letter requests information regarding Part 573 Defect Reports submitted by Kia America, Inc., describing defects that may exist in Hydraulic Electronic Control Units (HECU) produced by Mando Corporation.

**REQUEST NO. 1:**

Accordingly, we required the following information for each of the recalls listed in the below table:

- a. The date on which Kia determined a Part 573 defect report was necessary;
- b. The date the initial Part 573 defect report was submitted to NHTSA;
- c. The date(s) that Part 577 owner notification letters (or, where applicable, interim owner notification letters) were mailed to owners;
- d. The date(s) that Part 577 dealer notifications were issued to dealers and the form and manner in which that notification occurred;
- e. The determining reason(s) for the recalled scope;
- f. A detailed description of the defect
- g. A detailed description of the root cause;
- h. A detailed description of the remedy and how it addresses 49 U.S.C. § 30120(a)(1)(A)(i) “by repairing the vehicle”;
- i. The HECU part number(s), as assigned by Kia, installed into each model and model year;
- j. The HECU part number(s), as assigned by Mando, installed into each model and model year;

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1	16V-815 / Hydraulic Electronic Unit may Short
2	20V-518 / ABS Unit may cause Fire
3	20V-519 / Hydraulic Electronic Unit May Short
4	21V-137 / Engine Compartment Fire
5	21V-331 / Hydraulic Electronic Unit May Short
6	22V051 / Engine Compartment Fire
7	22V-800 / Engine Compartment Fire
8	23V-652 / HECU May Cause Engine Compartment Fire

Provide your responses in a table in Microsoft Excel organized by recall number.

**RESPONSE TO REQUEST NO. 1:**

A Microsoft excel file containing the requested information is being submitted contemporaneously with this written response. **TAB A.**

**REQUEST NO. 2:**

Identify who makes the safety defect decision at Kia and explain what information is considered by that person when they make a decision.

**RESPONSE TO REQUEST NO. 2:**

The individual currently responsible for making safety defect decisions for the U.S. market is Jurassic Park, Vice-President and Chief Safety Officer, Kia North America. The information considered by Mr. Park varies depending on the specific issue but generally consists of field data information (e.g., customer complaints, techline cases, warranty claims, legal cases, number of injuries, fires, crashes, and/or deaths), VOQs, frequency, severity and detectability of issue (i.e. NHTSA Risk Matrix), engineering evaluation/analysis of issue, whether the component is involved in another manufacturer recall or in a substantially similar vehicle recalled in another market, and NHTSA precedent.

**REQUEST NO. 3:**

For each safety defect decision Kia has made regarding the recalls listed in the table above, produce a copy of any presentations, reports, summaries (including executive summaries), or other documents the decision-maker had at the time the decision was made.

**RESPONSE TO REQUEST NO. 3:**

A copy of the documents responsive to this request are being submitted contemporaneously with this written response. **TABS B-J.**

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Recall Management Division  
January 19, 2024

**REQUEST NO. 4:**

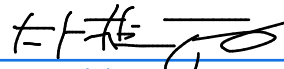
Provide any additional information, including supporting documentation, that may be helpful to explain the timing and scope of Kia's Part 573 reports for the recalls listed in the table above.

**RESPONSE TO REQUEST NO. 4:**

The information and documents that explain the timing and scope of each of Kia's recalls are provided in its response to Request Nos. 1 and 3 as well as the associated chronologies submitted with each 573 defect report.

If you have any questions or if you need anything further, please do not hesitate to contact me.

Sincerely,



[Jurassic park \(Jan 19, 2024 11:48 PST\)](#)

J.S. (Jurassic) Park  
Vice President, Chief Safety Officer