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552(B)(6)

HONDA

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

May 18, 2023

NEF-101smo
PE23-005

Ms. Sharon Yukevich, Chief
Vehicle Defects Division - D
Office of Defects Investigation
U.S. Department of Transportation
National Highway Traffic Safety Administration
1200 New Jersey Ave., SE
Washington, DC 20590

Dear Ms. Yukevich:

In reply to your letter dated March 27, 2023 requesting certain information in support of ODI's open Preliminary Evaluation (PE23-005) to investigate allegations of momentary steering effort increases in certain 2022-2023 Model Year (MY) Honda Civic vehicles manufactured by American Honda Motor Co. Inc. (Honda), we submit the following responses for Honda.

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

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 and peer vehicle manufactured to date by Honda, state the following:**
 - a. **Vehicle identification number (17-character VIN);**
 - b. **Make;**
 - c. **Model;**
 - d. **Model Year;**
 - e. **Subject component part number and design version installed as original equipment;**
 - f. **Date of manufacture (MM/DD/YYYY);**
 - g. **Date 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 and peer vehicles Honda has manufactured for sale or lease in the United States, including, but not limited to, the District of Columbia, and current U.S. territories and possessions are provided in the table below:

Confidential information contained within this document denoted by double red brackets [[]]

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Model	Model Year	Number of Units Manufactured
Civic	2022	
	2023	
Integra	2023	

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Source: Honda database for market analysis (CoReMQ)

Last date the information was gathered: 4/28/2023

For data elements "a" through "h" of Request 1: Please see folder R1, "PRODUCTION DATA", in the attached .zip file which contains individual files for each subject and peer vehicle. This was done to keep files as small as possible to make working with the data less cumbersome for you.

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 and peer 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. Property damage claims;
 - 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:

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Report Type/Category	Quantity (#)			
	Civic		Integra	
	Total	Unique VINs	Total	Unique VINs
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:				
e. Third-party arbitration proceedings where Honda is or was a party to the arbitration:				
f. Lawsuits, both pending and closed, in which Honda is or was a defendant or codefendant:				

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Source: Automobile Customer Service (ACS), Tech Line, Field Reports, and Honda's matter management system.

Last date the information was gathered: 5/3/2023

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:
- Honda's file number or other identifier used;
 - The category of the item, as identified in Request No. 2 (i.e., consumer complaint, field report, etc.);
 - Vehicle owner or fleet name (and fleet contact person), email address and telephone number;
 - Vehicle owner or fleet street address, city, state (postal abbreviation), and ZIP code;
 - Vehicle Identification Number (17-character VIN);
 - Vehicle's make, model, and model year (please use distinct fields for each data type);
 - Vehicle's mileage at time of incident;
 - Incident date (MM/DD/YYYY);
 - Report or claim date (MM/DD/YYYY);
 - Whether a crash is alleged;
 - Whether property damage is alleged;
 - Number of alleged injuries, if any; and
 - Number of alleged fatalities, if any.

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

Response:

For data elements responsive to "a" through "m": Please see folder "R3", filename "REQUEST NUMBER TWO DATA" in the attached .zip file.

Source: Automobile Customer Service (ACS), Tech Line, Field Reports, and Honda's matter management system.

Last date the information was gathered: 5/03/2023

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:

Please see subfolders "PE22-011 R4 ACS", "PE22-011 R4 TL", "PE22-011 R4 FQR", and "PE23-005 R4 Law" in folder "R4" of the attached .zip file for copies of documents related to this request. Search methods/criteria descriptions are provided in the file "R4 Search Methods" which is also in the R4 folder.

Source: Automobile Customer Service (ACS), Tech Line, Field Reporting system (FQR), and Honda's matter management system.

Last date the information was gathered: 5/03/2023

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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."

Response:

The total number of warranty claims that may relate to the alleged defect in the subject vehicles is summarized in the table below:

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	Certified Used Car	Goodwill	Non-Discretionary (Standard Warranty)	Vehicle Service Contract	Total by Model/MY
Civic					
2022					
2023					
Civic Total					
Integra					
2023					
Integra Total					
Total by claim type					

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For data elements responsive to "a" through "o": Please see folder "R5", filename "WARRANTY DATA" in the attached .zip file.

Source: Warranty Database

Last date the information was gathered: 4/20/2023

6. **State, by model and model year, a total count for all claims made by dealerships for repairs made prior to the time of retail sale that relate or may relate to the alleged defect in the subject and peer vehicles.**

Separately, for each such claim, state the following information:

- a. Honda's claim number;
- b. Vehicle owner or fleet name, or dealer owner (and fleet contact person), email address and telephone number (please use distinct fields for each data type);
- c. Vehicle owner or fleet or dealer owner 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 or dealer;
- 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 "PRE-DELIVERY REPAIR DATA."

Response:

At this time, Honda does not have any pre-retail sale repair claims that related to, or may relate to, the occurrence of the alleged defect in the subject or peer vehicles.

Source: Market Quality Database

Last date the information was gathered: 4/06/2023

7. **Describe in detail the search methods and search criteria used by Honda to identify the claims in response to Request No. 5 and No. 6, including the labor operations, problem codes, diagnostic trouble codes, part numbers and any other pertinent parameters used.**

Response:

Please see contents of folder R7 file name "Warranty Search Criteria" in the attached .zip file for Honda's response to Request 7.

Source: Warranty Department

Last date the information was gathered: 4/28/2023

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8. 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 into the warranty database by a claims administrator.

Response:

Please see contents of folder R8, file name "Labor Op Codes & DTCs" in the attached .zip file for Honda's response to Request 8.

Source: Warranty Database

Last date the information was gathered: 4/28/2023

9. 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 and peer vehicles and state by option, model, and model year, the number of vehicles that are covered under each such extended warranty.

Response:

Please see below a summary of warranty coverage for the subject and peer vehicles:

Standard Warranty:

Model	Model Year	Miles Covered	Months Covered	Systems Covered	Miles Covered	Months Covered	Systems Covered
Civic	2022-2023	36,000	36	Bumper-to-Bumper	60,000	60	Powertrain
Integra	2023	50,000	48	Bumper-to-Bumper	70,000	72	Powertrain

Extended Warranty:

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Model	Model Year	Extended Warranty Coverage Options See VSC Coverage Stats tab in attachment for detail by various time, mileage, and deductible options	Number of Vehicles With Extended Warranty
Civic	2022		
	2023		
Integra	2023		

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For a breakdown of extended warranty coverage option details, please see filename "PE23-005 R9" in folder R9 in the attached .zip file.

Source: Warranty and Vehicle Service Contracts Departments

Last date the information was gathered: 4/28/2023

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10. Produce copies of all service, warranty, and other documents that relate to, or may relate to, the alleged defect in the subject and peer 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, with the exception of standard shop manuals. Also include the latest draft copy of any communication that Honda is planning to issue within the next 120 days.

Response:

At this time, Honda does not have any documents responsive to this request and does not plan to issue any within the next 120 days.

*Source: Dealer and Zone office facing web portal (iN) and publications database
Last date the information was gathered: 4/10/2023*

11. 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 and 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:
- Action title or identifier;
 - The actual or planned start date;
 - The actual or expected end date;
 - Summary of the subject and objective of the action;
 - Engineering group(s)/supplier(s) responsible for designing and for conducting the action; and
 - 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:

Please see filename "PE23-005 R11" for a tabulated response to Request 11 and its related attachments within folder R11 in the attached .zip file.

*Source: QIS Database
Last date the information was gathered: 5/16/2023*

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- 12. 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 and peer vehicles. For each such modification or change, provide the following information:**
- a. The date or approximate date on which the modification or change was incorporated into vehicle production;**
 - b. A detailed description of the modification or change;**
 - c. The reason(s) for the modification or change;**
 - d. The part number(s) (service and engineering) of the original system;**
 - e. The part number(s) (service and engineering) of the modified system;**
 - f. Whether the original unmodified system was withdrawn from production and/or sale, and if so, when;**
 - g. When the modified system was made available as a service system; and**
 - h. Whether the modified system can be interchanged with earlier production system.**

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:

Please see filename "PE23-005 R12" for a tabulated response to Request 12 and its related attachment within folder R12 in the attached .zip file.

Source: Drawing History

Last date the information was gathered: 5/18/2023

- 13. State the number of each of the following that Honda has sold that may be used in the subject and peer 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):**
- a. Subject component and;**
 - b. Any kits that have been released, or developed, by Honda for use in service repairs to the subject 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:

Please see contents of filename "PE23-005 R13" in folder R13 within the attached .zip file for Honda's response to Request 13.

Source: Parts Database

Last date the information was gathered: 5/17/2023

Confidential information contained within this document denoted by double red brackets [[]]

14. Furnish Honda's assessment of the alleged defect in the subject and peer 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.**

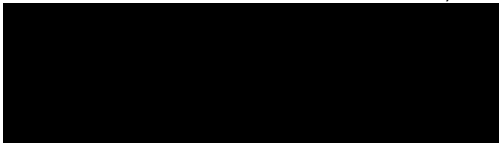
Response:

Per the Memorandum received from your office on May 16, 2023, Honda has been granted an extension to respond to this request and will submit its response no later than June 5, 2023.

Please do not hesitate to contact me if you have any questions.

Sincerely,

AMERICAN HONDA MOTOR CO., INC.



Jeff Chang
Senior Manager
Product Regulatory Office

JHC:bi

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

Attachments