

INFORMATION REDACTED PURSUANT TO THE FREEDOM OF INFORMATION ACT (FOIA), 5 U.S.C. 552(B)(6)

HONDA

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

August 28, 2024

EA24002

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

Subject: Information Request ID EA24002-01

Dear Ms. Yukevich:

In reply to your letter dated July 18, 2024, requesting certain information in support of ODI's open Engineering Analysis (EA24-002) to investigate allegations of the activation of the Collision Mitigation Braking System (CMBS) with no apparent obstruction present in certain model year (MY) 2018-2022 Honda Accord and 2017-2022 Honda CR-V 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 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 (17-character VIN);**
 - b. **Make;**
 - c. **Model;**
 - d. **Model Year;**
 - e. **Subject system part number and design version installed as original equipment;**
 - i) **Software version(s);**
 - ii) **Hardware version(s);**
 - 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."

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

Response 1:

The number of subject 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 file "EA24-002_R1_PRODUCTION DATA SUMMARY.xlsx" in the response folder "Q1" for Request 1, and in the table below:

Model	Model Year	Number of Units Manufactured
Accord	2018	340,252
	2019	236,571
	2020	208,736
	2021	182,929
	2022	198,243
CR-V	2017	257,122
	2018	359,187
	2019	339,757
	2020	318,501
	2021	286,159
	2022	269,629

Source: Honda database for market analysis (CoReMQ)

Last date the information was gathered: 7/24/2024

For data elements "a" through "h" of Request 1: Please see subfolder "Q1a-1h" which contains separate files for groupings of subject vehicles (for file sizes to be manageable).

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. 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's 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.

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Response 2:

Report Type/Category	Quantity (#)
a. Consumer complaints, including those from fleet operators:	1069
b. Field reports, including dealer field reports:	[[[REDACTED]]]
c. Reports involving a crash*, injury or fatality:	[REDACTED]
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:	[REDACTED]

* For these subsets of the reports that involve a crash or property damage, it is not always clearly delineated in the complaint whether the crash occurred with the subject, or a related system activated. These are included in the response for completeness.

For summaries related to data elements 2c, 2d, and 2f, please see filename "EA24-002 R2-CBI.xlsx" in the folder, Q2.

[[[REDACTED]]]

[REDACTED]

[REDACTED]

Source: Automobile Customer Service (ACS), Tech Line, Field Reports, Honda's matter management system, and, in certain instances, records of legal proceedings retained by outside attorneys of record.

Last date the information was gathered: 8/23/2024

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 (numeric data type);
 - h. Incident date (MM/DD/YYYY);
 - i. Incident details, if known, including:
 - i) Location and/or GPS coordinates;
 - ii) Posted speed limit;
 - iii) Roadway type (e.g., highway, local roads, etc.);

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- iv) Roadway features (e.g., overpass, construction plate, etc.)
- v) Roadway obstructions (e.g., debris, traffic cones, etc.);
- vi) Traffic conditions;
- j. Whether Honda or any affiliated party inspected the vehicle;
- k. Whether Honda or any affiliated party obtained data from the vehicle;
- l. The method for obtaining the vehicle data (e.g., telematics);
- m. If available, provide the following details of the stored braking event(s) closest to the incident by date and by mileage:
 - i) Whether the stored event was assessed to correspond to the alleged incident;
 - ii) Event date and time (specify date and time formats);
 - iii) Event mileage;
 - iv) Event key cycle;
 - v) Speed of travel at event onset;
 - vi) Speed of travel at event conclusion;
 - vii) The duration of braking commanded by the vehicle;
 - viii) The maximum braking deceleration commanded by the vehicle;
 - ix) Whether the subject system initiated braking;
 - x) If so, the braking response level of the subject system (i.e., Stage 2 or Stage 3);
 - xi) If not initiated by the subject system, the name of the system that commanded braking;
- n. Whether Honda or any affiliated party confirmed and/or duplicated the alleged condition;
- o. Report or claim date (MM/DD/YYYY);
- p. Whether a crash is alleged;
- q. Whether property damage is alleged;
- r. Number of alleged injuries, if any; and
- s. Number of alleged fatalities, if any.

Response 3:

For data elements responsive to “a” through “s”: Please see folder Q3, filename “AE24-002 R3 REQUEST NUMBER TWO DATA_CBI.xlsx”.

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Source: Automobile Customer Service (ACS), Tech Line, Field Reports, Honda's matter management system, and, in certain instances, records of legal proceedings retained by outside attorneys of record.

Last date the information was gathered: 8/23/2024

- 4. Produce copies of all data logs of braking events stored in any onboard vehicle system (including an electronic data recorder, control module, other computer module, etc.) and/or captured via telematics related to each item within the scope of Request 2. Additionally, produce copies of all documents related to each item within the scope of Request No. 2. Organize the data and 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.

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Response 4:

Please see folder Q4 for files "EA24-002 R4 ACS_CBI.pdf" for complaints, "EA24-002 R4 TL_CBI.pdf" and "EA24-002 R4 FQR_CBI.pdf, and "EA24-002 R4 FQR (from PE22-003_CBI.pdf" for field reports, and subfolder "EA24-002 R4 Law" for lawsuits and their supplemental documentation, related to this request. Search methods/criteria descriptions are provided in the file "EA24-002 R4 Search Criteria_CBI.xlsx" which is also in folder Q4. For documents collected in relation to certain dealer field reports, please see subfolders "1-TL Field Report Attachments", "2-TL Field Report Attachments", and "3-TL Field Report Attachments" in folder Q4.

Source: Automobile Customer Service (ACS), Tech Line, Field Reporting system (FQR), Honda's matter management system, and, in certain instances, records of legal proceedings retained by outside attorneys of record.

Last date the information was gathered: 8/23/2024

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 identification number (17-character VIN);
- e. Repair date (MM/DD/YYYY);
- f. Vehicle mileage at time of repair (numeric data type);
- 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;
- o. Additional comments, if any, by dealer/technician relating to claim and/or repair;
- p. If available, provide the following details of the stored braking event(s) closest to each incident alleged by the claimant by date and by mileage:
 - i) Whether the stored event was assessed to correspond to any alleged incident;
 - ii) Event date and time (specify date and time formats);
 - iii) Event mileage;
 - iv) Event key cycle;
 - v) Speed of travel at event onset;
 - vi) Speed of travel at event conclusion;
 - vii) The duration of braking commanded by the vehicle;
 - viii) The maximum braking deceleration commanded by the vehicle;
 - ix) Whether the subject system initiated braking;

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- x) If so, the braking response level of the subject system (i.e., Stage 2 or Stage 3); and
- xi) If not initiated by the subject system, the name of the system that commanded braking.

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

Response 5:

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	Vehicle Service Contract	Total by Model/MY
ACCORD					
2018					
2019					
2020					
2021					
2022					
Accord Total					
CR-V					
2017					
2018					
2019					
2020					
2021					
2022					
CR-V Total					
Total by claim type					

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For data elements responsive to "a" through "p": Please see folder "Q5", filename "EA24-002 R5 WARRANTY DATA_CBI.xlsx"

Source: MQ Claims and Warranty Business Intelligence for Customer Information
 Last date the information was gathered: 8/14/2024

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.

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Response 6:

Please see file names "EA24-002 R6 Warranty Search Criteria_CBI.xlsx in the Q6 response folder.

Source: Warranty and Market Quality Departments
Last date the information was gathered: 8/14/2024

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 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 7:

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Source: Warranty Database
Last date the information was gathered: 8/14/2024

8. 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, 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 8:

Please see contents of folders and subfolders for Request 8 in the Q8 folder on the SBI portal. Note, corporate training material in video form had been previously submitted in our response to IR for PE22-003 and are not reproduced in this response.

Source: Dealer and Zone office facing web portal (iN) and publications database
Last date the information was gathered: 8/5/2024

9. 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 including, but not limited to, pre- and/or post-production testing and/or validation including NCAP evaluations and peer benchmarking and/or any actions involving telematics data. 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;

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- 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 9:

[[]]

[REDACTED]

[REDACTED]

[REDACTED]

[[]]

Source: GO-ADC, ADC, MQ

Last date the information was gathered: 8/15/2024

10. 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:
- 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 hardware and software names and numbers of the original version;
 - e. The hardware and software names and numbers of the modified version;
 - f. Whether the original unmodified version was withdrawn from production and/or sale, and if so, when;
 - g. When the modified version was made available as a service component; and
 - h. Whether the modified component can be interchanged with earlier production versions.

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 10:

Please see folder Q10 to find our responses to this request in EA24-002 R10_CBI.xlsx.

Source: GO-ADC

Last date the information was gathered: 8/13/2024

11. List all components of the subject system, produce copies of specification documents, and state the following information:

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- a. Component name, model and/or identifier;
- b. Component type and system function;
- c. Component supplier;
- d. Sensor position(s) and orientation(s); and
- e. Sensor position and alignment tolerances.

For subpart “d,” provide engineering drawings and describe any differences in sensor mounting that exist between subject vehicles.

Response 11:

Please see contents of folder Q11 for Honda’s response to Request 11. Q11 contains subfolders for each of camera, radar, and sensor specs.

Source: GO-ADC

Last date the information was gathered: 8/13/2024

12. Describe how subject system calibration is performed during vehicle production, operation, service, and collision repair, and describe any differences that exist between the subject vehicles.

Response 12:

Please see contents of folder Q12 for Honda’s response to Request 12 regarding calibration.

Source: GO-ADC

Last date the information was gathered: 8/9/2024

13. Describe the subject system design, operation and performance and any differences that exist between the subject vehicles including but not limited to:

- a. Requirements that may relate to the alleged defect (including false positive rate, receiver operating characteristic curve, etc.);
- b. All stored data elements related to a vehicle-commanded braking event;
- c. Identification of and response to false target tracks;
- d. System logic, including entrance and exit criteria, for each collision warning and response stage and associated thresholds;
- e. Minimum and maximum braking deceleration that the system is able to command for each collision response stage and throughout its operational envelope;
- f. Any initial ramp up to maximum deceleration applied by the system;
- g. Any minimum and maximum braking durations and whether the system may continue to hold the brakes if a complete stop is achieved;
- h. Thresholds for detection of both horizontal and vertical sensor misalignments and the associated DTCs;
- i. Impact on system performance of radio frequency (RF) interference (e.g., from automotive radars equipped on other vehicles and other sources) and related subject system mitigations; and
- j. All conditions (including driver control inputs, vehicle dynamics, etc.), that override subject system braking activation and the minimum thresholds and durations required to do so.
 - i) For accelerator pedal overrides, state whether the driver must first fully release the

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[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]


[REDACTED]

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

Sincerely,

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


AMERICAN HONDA MOTOR CO., INC.

Andrea Martin
Senior Director
Product Regulatory Office

ASM:bi

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

Attachments