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**HONDA**

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

April 19, 2024

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: Information Request ID PE24004-01

Dear Ms. Yukevich,

In reply to the letter dated February 27, 2024, Honda is submitting this response regarding your investigation of certain Model Year (MY) 2020 - 2023 Honda Ridgeline vehicles manufactured by American Honda Motor Co. Inc. (Honda), focused on allegations that damage to the tailgate wire harness during normal use of the vehicle is causing the Rear View Camera (RVC) to fail to function properly. Should you have any questions, please feel free to contact Honda.

Respectfully,

AMERICAN HONDA MOTOR CO., INC.

  
Andrea Martin  
Senior Director  
Product Regulatory Office

AM:tk

cc: Office of Chief Counsel, NHTSA  
Michael Fitzgerald, NHTSA

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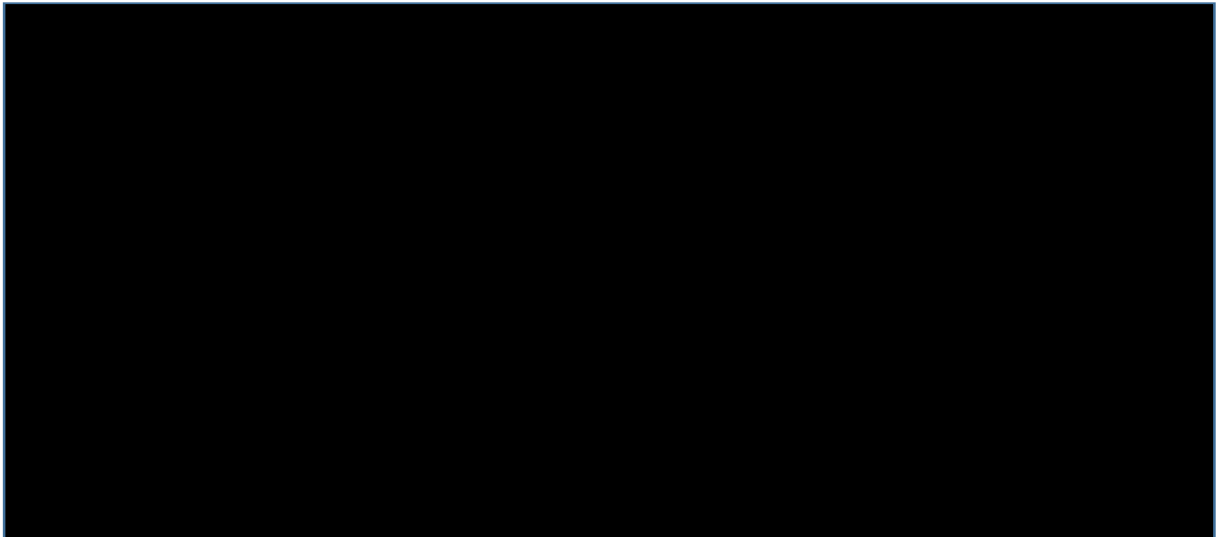
1. State, by model and model year, the number of Subject and Peer Vehicles Honda has manufactured for sale or lease in the United States. Separately, for each Subject and Peer Vehicle manufactured to date by Honda, state the following:
  - a. Vehicle identification number (17-character VIN);
  - b. Make;
  - c. Model;
  - d. Model Year;
  - e. Subject component part number and design version installed as original equipment;
  - f. Date of vehicle manufacture (MM/DD/YYYY);
  - g. Date warranty coverage commenced (MM/DD/YYYY);
  - h. The State in the United States where the vehicle was originally sold or leased, or delivered for sale or lease (postal abbreviation); and
  - i. For Peer Vehicles, the date recall 22V-867 remedy was completed.

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:*

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*For the production data, including items "a" through "i", please see the included files:*

- "PE24-004 - R1 Subject Vehicles (PRODUCTION DATA) - CONFIDENTIAL.xlsx"
- "PE24-004 - R1 Peer Vehicles (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 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. Reports involving a fire;
  - e. Property damage claims;
  - f. Third-party arbitration proceedings, both pending and closed, where Honda is or was a party to the arbitration; and
  - g. Lawsuits, both pending and closed, in which Honda is or was a defendant or codefendant.

For subparts “a” through “g” 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 “g,” 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 “f” and “g,” 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 “g” and the additional information requested, please see the included file titled:*

- *“PE24-004 - 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 a fire is alleged;
  - l. Whether property damage is alleged;

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- m. Number of alleged injuries, if any;
- n. Number of alleged fatalities, if any; and
- o. For Peer Vehicles, the date recall 22V-867 remedy was completed.

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:*

- *"PE24-004 – 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.

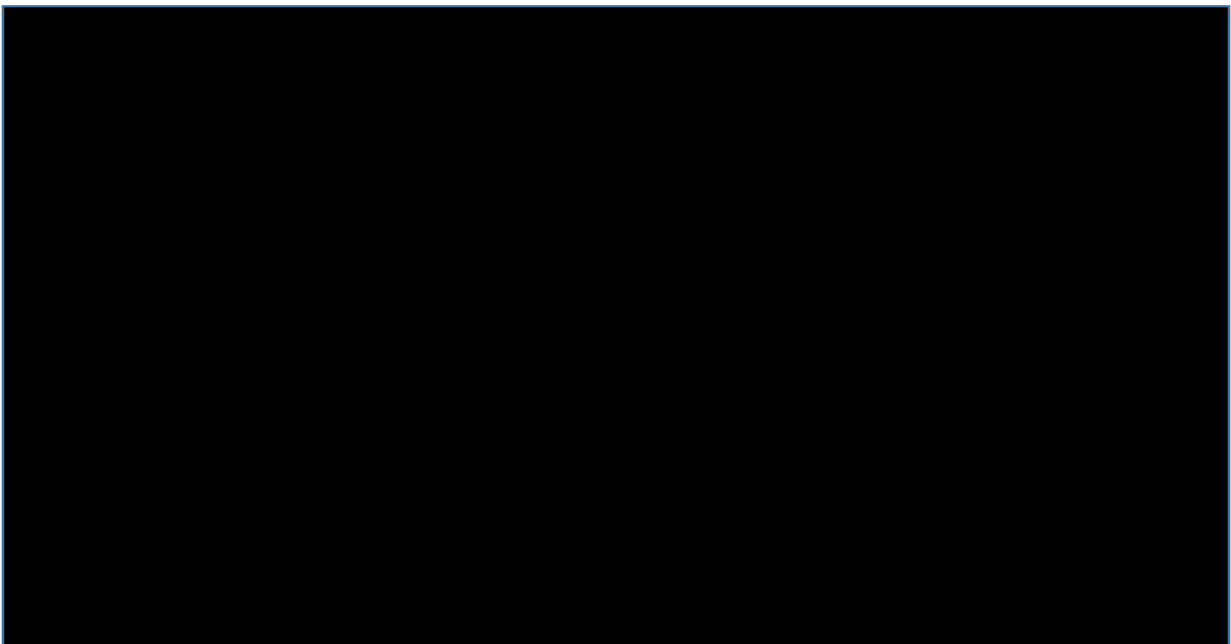
Response:

*For the copies of complaints, please see the included files titled:*

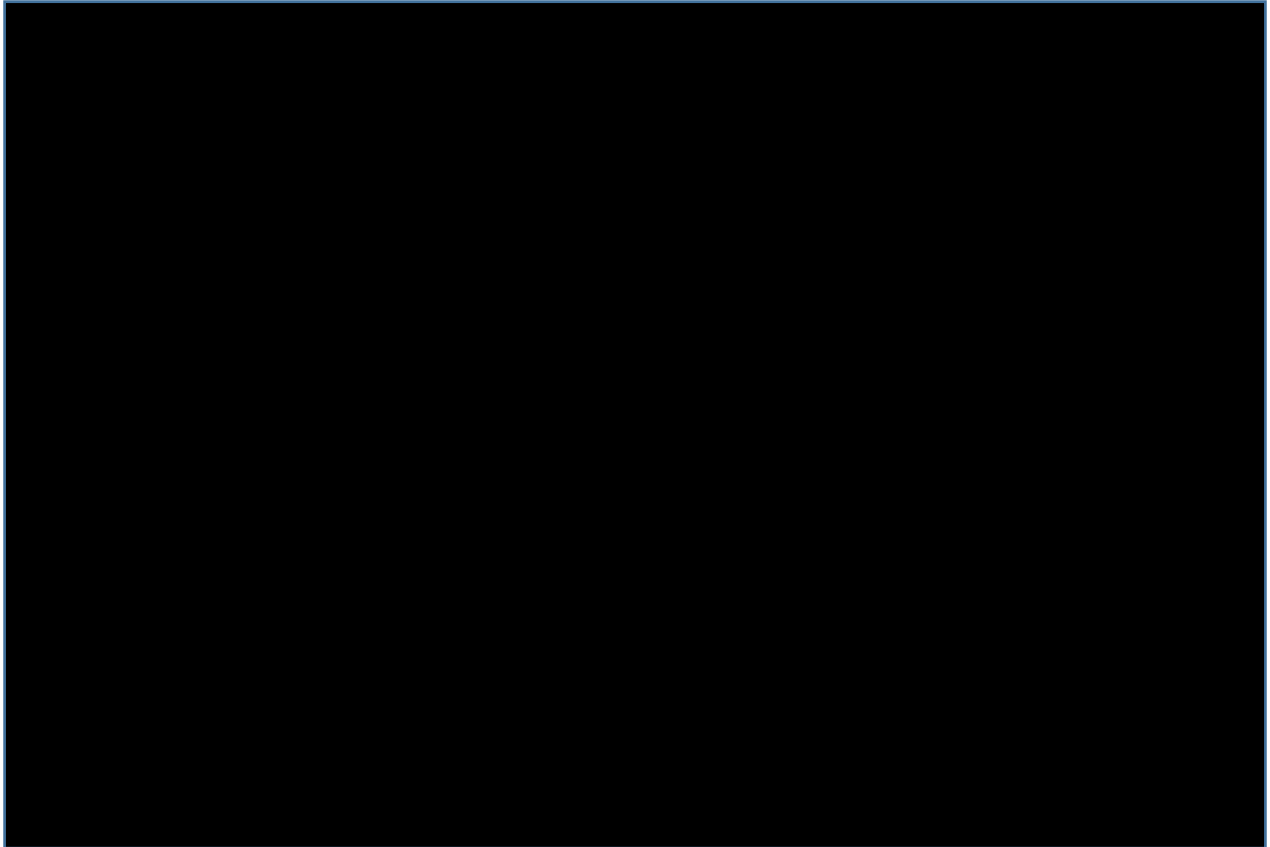
- *"PE24-004 - Legal cases - CONFIDENTIAL.pdf"*
- *"PE24-004 - techline reports - CONFIDENTIAL.pdf"*
- *"PE24-004 - field reports - CONFIDENTIAL.pdf"*
- *"PE24-004 - customer relations cases - CONFIDENTIAL.pdf"*

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

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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 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; 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:

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

- "PE24-004 – R5 (WARRANTY DATA) – CONFIDENTIAL.xlsx"

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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:

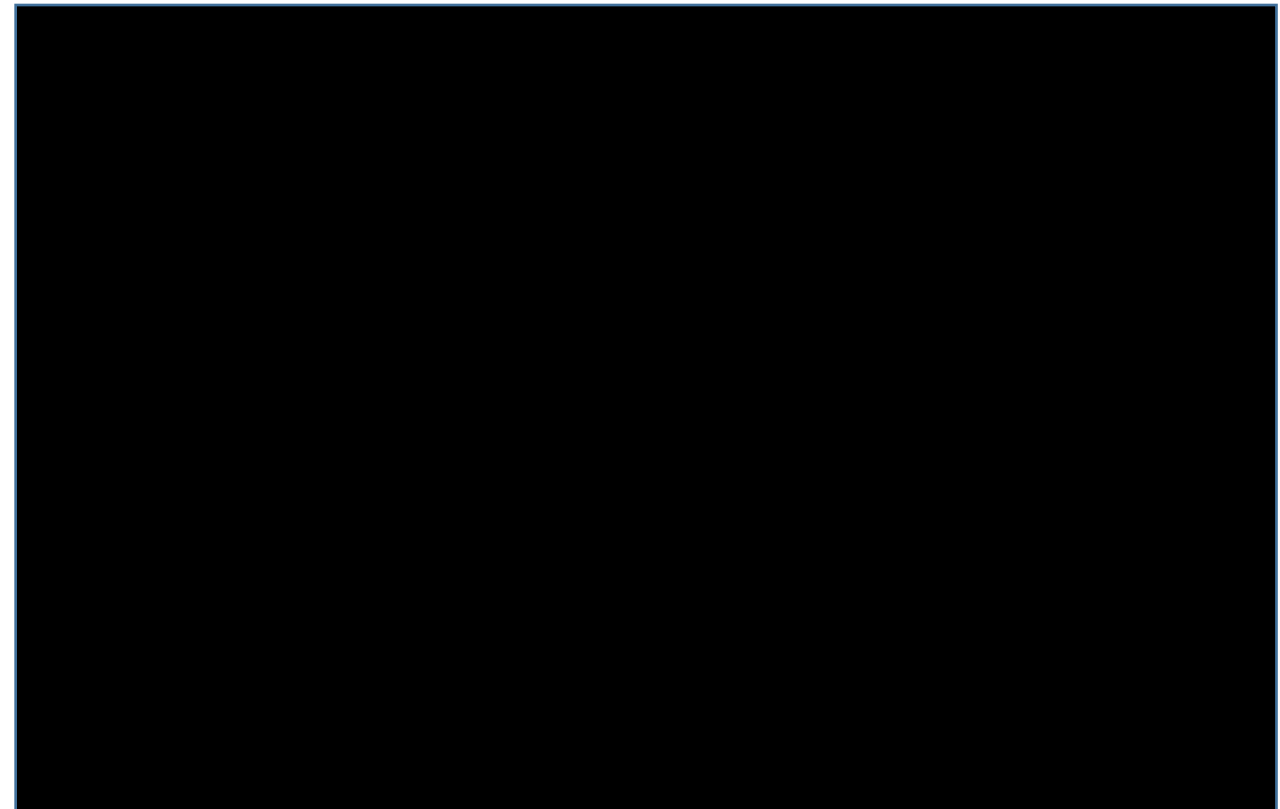
*Honda conducted the warranty search using 2020-2023 Model Year Ridgeline with a “replaced part number” prefix of “32109” for the tailgate wire harness. The data was searched for the US and the US Territories.*

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:

*Labor operation codes and problem codes listed in the table below appear in the warranty data that was captured in the warranty search as described in the response to request number 6 above. No Diagnostic Trouble Codes are involved with the Alleged Defect.*

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8. 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 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 vehicles:*

- 3 years/36,000 miles

*For the extended warranty coverage data, please see the included file titled:*

- "PE24-004 – 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, 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:

*There is one relevant communication document. Please see the included file titled:*

- "DVR-904 - Parts-Information Collection Request - 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 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. Brief 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 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.

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Response:

The below included file summarizes the activities related to request number 10.

- "PE24-004 - R10 related summary – CONFIDENTIAL.xlsx"

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

- "PE24-004 - R10 (Investigation) - CONFIDENTIAL.pdf"
- "Customer Questionnaire October 2022 - CONFIDENTIAL.pdf"
- "Ridgeline DVR summary -4-19-2023 - CONFIDENTIAL.xlsx"
- "Ridgeline\_ManagerSurvey\_Results\_10-31-2022\_R2 - CONFIDENTIAL.xlsx"

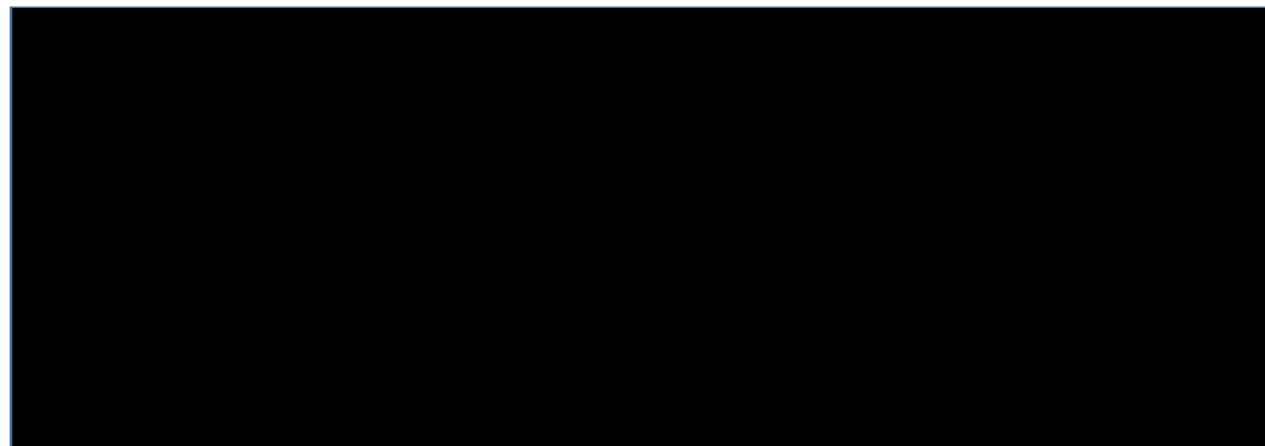
11. Describe all modifications or changes made by, or on behalf of, Honda in the design, material composition, manufacture, quality control, supply, or installation of the subject component, from the start of production to date, which relate to, or may relate to, the alleged defect in the Subject Vehicles. 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 part number(s) (service and engineering) of the original component;
- e. The part number(s) (service and engineering) of the modified component;
- f. Whether the original unmodified component was withdrawn from production and/or sale, and if so, when;
- g. When the modified component was made available as a service component; and
- h. 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:

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*Please see the included files listed below for a summary of the change and the drawings for each of the parts.*

- *“PE24-004 – R11 (Subject Component Change History) - CONFIDENTIAL.pdf”*
- *“32109T6Z\_A102\_\_\_\_A1906776 - CONFIDENTIAL.tif”*
- *“32109T6Z\_A103\_\_\_\_A2000589 - CONFIDENTIAL.tif”*

*For changes that Honda plans within the next 120 days, please see the attached file:*

- *“PE24-004 – R11 (future change to Subject Component) – CONFIDENTIAL.pdf”*

12. Describe in detail the specifications of the Subject Component including but not limited to what components and/or systems are connected to the Subject Component and what the Subject Component connects to.

*Response:*

*The below included PowerPoint file summarizes the response to request number 12.*

- *“PE24-004 - R12 (Component Specs) - CONFIDENTIAL.pdf”*

*Also included is the following document, which contains wire harness specifications.*

- *“Component Specs - CONFIDENTIAL.pdf”*

*The main component involved with the Alleged Defect is the tailgate wiring harness. The tailgate harness is attached to the rear view camera on one end and another wiring harness, in the truck bed area, on the other end.*

13. Describe in detail any difference in specifications or function between the Subject Component and the remedy parts in recall 22V-867.

*Response:*

*For the difference in the tailgate wire harness, please see the included file titled:*

- *“Difference between 17-19 vs 20-23 tailgate harness - CONFIDENTIAL.pdf”*

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14. State the number of each of the following that Honda has sold that may be used in the Subject 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:

- a. Subject component; and
- b. Any kits that have been released, or developed, by Honda for use in service repairs to the Subject Component/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:

*For part sales data, please see the included Excel file titled:*

- *"PE24-004 - R14 (Part Sales) - CONFIDENTIAL.xlsx"*

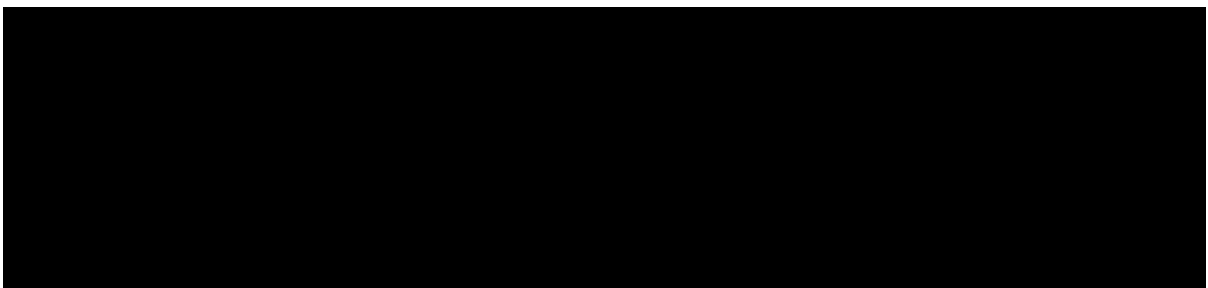
15. Furnish Honda's assessment of the alleged defect in the Subject Vehicles, including:

- 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;
- 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;
- f. Any factors which would cause a difference in performance between the subject component and the peer population; and
- g. The reports included with this inquiry.

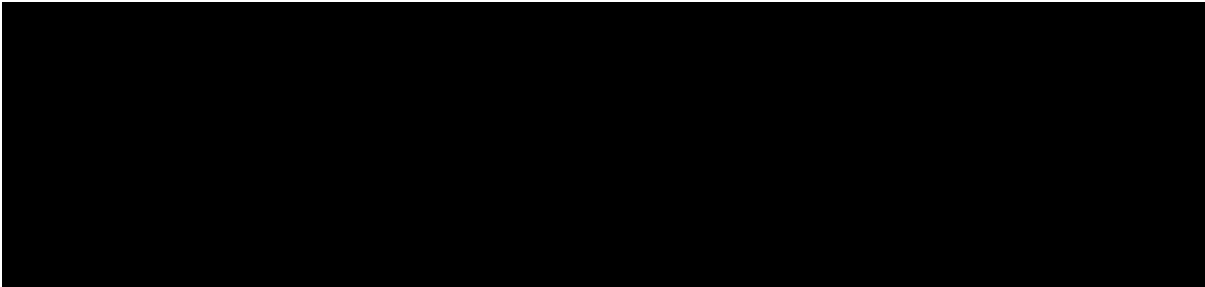
Response:

- a. *The causal or contributory factor(s);*

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b. *The failure mechanism(s);*

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c. *The failure mode(s);*

*Loss of electrical continuity on the RVC electrical circuit results in the RVC image not being displayed on the center display screen.*

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

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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;*

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- f. *Any factors which would cause a difference in performance between the subject component and the peer population; and*

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- g. *The reports included with this inquiry.*

*For the Alleged Defect and Subject Component, the reports included with this inquiry show the investigation conducted thus far, design characteristics, and design change history.*