

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

HONDA

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

May 16, 2024

PE24-008

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 20, 2024, requesting certain information in support of ODI's open Preliminary Evaluation (PE24-008) to investigate allegations of the activation of the Collision Mitigation Braking System (CMBS) with no apparent obstruction present in certain model year (MY) 2019-2022 Honda Insight and 2019-2022 Honda Passport 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 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 trade/trim name, part number and design version installed at time of manufacture;
 - i) Software Version;
 - ii) Firmware Version;
 - iii) Hardware Version;
 - 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).

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Response 1:

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:

	Model	Model Year	Number of Units Manufactured
Subject Vehicles	Insight	2019	34,824
		2020	15,269
		2021	11,961
		2022	17,346
	PASSPORT	2019	42,971
		2020	27,687
		2021	60,326
		2022	40,107
Peer Vehicles	PASSPORT	2023	44,392
		2024	14,594
	Pilot	2019	148,806
		2020	99,540
		2021	151,046
		2022	144,671
	HR-V	2019	126,495
		2020	62,888
		2021	91,942
		2022	122,605
	TLX	2021	30,526
		2022	12,130

Source: Honda database for market analysis (CoReMQ)

Last date the information was gathered: 4/1/2024

For data elements "a" through "h" of Request 1: Please see file in R1, "PE24-008 R1 PRODUCTION DATA.xlsx", in the attached .zip file which contains individual tabs for each subject vehicle.

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2. State separately for the subject and peer vehicles 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:
- Consumer complaints, including those from fleet operators;
 - Field reports, including dealer field reports;
 - Reports involving a crash, injury, or fatality;
 - Property damage claims;
 - Third-party arbitration proceedings, both pending and closed, where Honda is or was a party to the arbitration; and
 - 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.

Response 2:

Report Type	Quantity (#) Subject Vehicles	Quantity (#) Peer Vehicles
a. Consumer complaints, including those from fleet operators:	104	270
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:		

For summaries related to data elements 2.c/d, and f, please see folder “R2”, filename “PE24-008 R2” 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: 5/13/2024

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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 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. The following specific incident details, if known, including:
 - i) Roadway type (e.g. highway, local, parking, etc.);
 - ii) Roadway features (e.g. overpass, construction plate, etc.)
 - iii) Speed of travel prior to incident onset;
 - iv) Traffic conditions (e.g. congested, non-congested, etc.);
 - v) ADAS Feature which commanded braking (e.g. CMBS, ACC, etc.); and
 - vi) Stage of CMBS Brake response (e.g. Stage 2, Stage 3, etc.)
 - j. Whether Honda has inspected the vehicle, and, if known, the location where the incident occurred;
 - i) If available, the location/address/mile marker and/or GPS coordinates;
 - ii) If so, state whether Honda confirmed or duplicated the occurrence;
 - k. Report or claim date (MM/DD/YYYY);
 - l. Whether a crash is alleged;
 - m. Whether property damage is alleged;
 - n. Number of alleged injuries, if any; and
 - o. Number of alleged fatalities, if any.

Response 3:

For data elements responsive to "a" through "o": 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: 4/1/2024

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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 4:

Please see subfolders "PE24-008 R4 ACS", "PE24-008 R4 TL", "PE24-008 R4 FQR", and "PE24-008 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 "PE24-008 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: 5/13/2024

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's identification number (17-character VIN);**
- e. **Vehicle's make, model and model year (please use distinct fields for each data type);**
- f. **Repair date (MM/DD/YYYY);**
- g. **Vehicle mileage at time of repair (numeric data type);**
- h. **Repairing dealer's or facility's name, telephone number, city and state or ZIP code (please use distinct fields for each data type);**
- i. **Labor operation number(s);**
- j. **Problem code(s);**
- k. **Diagnostic trouble code(s);**
- l. **Replacement part number(s) and description(s);**
- m. **Concern stated by customer;**
- n. **Cause as stated on the repair order;**
- o. **Correction as stated on the repair order; and**
- p. **Additional comments, if any, by dealer/technician relating to claim and/or repair.**

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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:

	Non-Discretionary (Standard Warranty)	Goodwill	Campaign	Certified Used Car	Vehicle Service Contract	Total by Model/MY
Insight						
2019	12	-	-	1	-	13
2020	6	-	-	-	-	6
2021	6	-	-	-	-	6
2022	4	-	-	-	-	4
Insight Total	28	-	-	-	-	29
Passport						
2019	108	3	-	-	-	111
2020	48	4	-	-	-	52
2021	52	3	-	-	-	55
2022	15	-	-	-	-	15
Passport Total	223	10	-	-	-	233
Total by claim type	251	10	-	1	-	262

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

Source: Warranty Database

Last date the information was gathered: 4/15/2024

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.

Response 6:

Please see folder "R6", file name "Warranty Search Criteria" in the attached .zip file for Honda's response to Request 6.

Source: Warranty and Market Quality Departments

Last date the information was gathered: 4/1/2024

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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:

Labor operation codes that dealers may use (entered manually) to be reimbursed for work performed in response to a customer claiming the alleged defect are listed in folder "R7", file name "CMBS LONs" in the attached .zip file. There are no diagnostic trouble codes (DTC) available to be triggered by or applicable to the alleged defect. Available DTCs are provided for your review in the CMBS LONs file.

Source: Warranty Database

Last date the information was gathered: 4/22/2024

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 8:

Please see folder "R8", file name "PE24-008_R8 Warranty Coverage" in the attached .zip file for details of warranty coverage for the subject vehicles and see below for a summary:

Standard Warranty:

Model	Model Year	Miles Covered	Months Covered	Systems Covered	Miles Covered	Months Covered	Systems Covered
Insight	2019-2022	36,000	36	Bumper-to-Bumper	60,000	60	Powertrain
Passport	2019-2022	36,000	36	Bumper-to-Bumper	60,000	60	Powertrain

Extended Warranty:

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
Insight	2019	Several time and Mileage options with Zero or \$100 Deductible	
	2020	Several time and Mileage options with Zero or \$100 Deductible	
	2021	Several time and Mileage options with Zero or \$100 Deductible	
	2022	Several time and Mileage options with Zero or \$100 Deductible	
Passport	2019	Several time and Mileage options with Zero or \$100 Deductible	
	2020	Several time and Mileage options with Zero or \$100 Deductible	
	2021	Several time and Mileage options with Zero or \$100 Deductible	
	2022	Several time and Mileage options with Zero or \$100 Deductible	

Source: Warranty and Vehicle Service Contracts Departments

Last date the information was gathered: 4/18/2024

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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 9:

Please see contents of folder R9 in the attached .zip file for Honda's response to Request 9. Note, corporate training material which cannot be redacted have been omitted from the non-confidential submission.

*Source: Dealer and Zone office facing web portal (iN) and publications database
Last date the information was gathered: 4/10/2024*

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, including, but not limited to, pre- and post-production testing, and any NCAP evaluations. 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 10:

Please see filename "PE24-008 R10 Investigations" for a response to Request 10 within folder R10 in the attached .zip file.

Note that some documents provided are not directly related to the subject vehicles. However, as the subject vehicles share common CMBS architecture with vehicles covered in PE22-003, we are providing those documents.

*Source: GO-ADC, ADC, MQ
Last date the information was gathered: 5/6/2024*

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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:

- 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, firmware, and software names and numbers of the original version;
- e. The hardware, firmware, 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 version 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 11:

Please see filename "PE24-008 R11_Design Changes" for a response to Request 11 within folder R11 in the attached .zip file.

Source: GO-ADC

Last date the information was gathered: 5/13/2024

12. Provide quantity and percentage of the subject and peer vehicles equipped with the subject system. Provide overall values as well as values broken down by trim level and state the subject system availability for each trim (e.g., not available, optional, standard).

Response:

Please see contents of folder R12 in the attached .zip file for Honda's response to Request 12.

Source: CoreMQ

Last date the information was gathered: 4/1/2024

13. Provide a list of all components within the subject system in the subject and peer vehicles including, but not limited to, Control module(s) and/or Sensor(s). For each component named, provide the following the following information:

- a. Control module and/or Sensor type and model;
- b. Supplier of each system component;
- c. Sensor position(s) and orientation(s); and
- d. Sensor position and alignment tolerances.

For subparts "c" and "d" provide the corresponding supplier specifications documents. For subpart "c" provide corresponding engineering drawings and describe any differences in sensor mounting that exist between subject and peer vehicles.

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Response:

Please see contents of folder R13 in the attached .zip file for Honda's response to Request 13.

Source: GO-ADC

Last date the information was gathered: 5/13/2024

14. For all components named in Response No. 13, identify any other Make, Model, and Model Year vehicles, other than the subject and peer vehicles, manufactured by Honda on which the named component is present.

Response:

Please see contents of folder R14 in the attached .zip file for Honda's response to Request 14.

Source: GO-ADC

Last date the information was gathered: 5/10/2024

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

Response:

Please see contents of folder R15 in the attached .zip file for Honda's response to Request 15.

Source: GO-ADC

Last date the information was gathered: 5/10/2024

16. Describe any system or component performance requirements related to the alleged defect in the Subject System.

Response:

Please see contents of folder R16 in the attached .zip file for Honda's response to Request 16.

Source: GO-ADC

Last date the information was gathered: 5/6/2024

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17. Describe in detail the subject system operation and performance and any differences that exist between the subject and peer vehicles including but not limited to:

- a. How the subject system determines that a crash is imminent;
- b. Minimum and maximum operating speeds;
- c. Braking force/deceleration rate that the system is able to command throughout the operational speed envelope;
- d. Minimum and maximum braking duration;
- e. Vehicle and obstacle classification;
- f. Response to the presence of other vehicles in adjacent and/or oncoming lanes;
- g. Detection of and response to system performance degradation and potential causal factors including but not limited to sensor occlusion, sensor misalignment, internal communication errors, and environmental conditions; and
- h. All driver control inputs that cancel or override subject system AEB activation and minimum input thresholds.

Response:

Please see contents of folder R17 in the attached .zip file for Honda's response to Request 17.

Source: GO-ADC

Last date the information was gathered: 5/6/2024

18. 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), including the specific operating conditions at which the unnecessary autonomous braking can occur (e.g. vehicle speed, driving scenario);
- 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 system was malfunctioning;
- f. Comparative performance of subject vehicles to the peer vehicles and other Honda vehicles equipped with CMBS systems with an assessment of the reason for any differences in performance; and
- g. The reports included with this inquiry.

Response:

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



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

Sincerely,



AMERICAN HONDA MOTOR CO., INC.

Andrea Martin
Senior Director
Product Regulatory Office

ASM:bi

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

Attachments