



U.S. Department of Transportation
**National Highway Traffic Safety
Administration**



August 11, 2025

Mr. J. S. Park
Vice President and Chief Safety Officer
North America Safety Office
Kia Motor America
111 Peters Canyon Road
Irvine, CA 92606
jspark@kiausa.com

AQ25001
25V099

Dear Mr. Park:

On February 17, 2025, Kia America, Inc. (Kia) notified the agency of a safety recall concerning certain Model Year (MY) 2021-2023 Seltos and Soul vehicles. This safety recall has been assigned the identification number 25V099. The subject vehicles of this recall may contain incorrectly manufactured piston oil rings, which may, over time, damage the engine causing a loss of motive power or an increased fire risk. The recall remedy became available on April 4, 2025. The recall remedy included an inspection procedure to determine whether an engine replacement was necessary. Kia changed the procedures for this inspection on May 7, 2025.

The Office of Defects Investigation (ODI), Recall Management Division (RMD), is conducting an Audit Query (AQ) on the remedy program for Safety Recall 25V099. This investigation has been assigned the identification AQ25001.

Unless otherwise stated in the text, the following definitions apply to these information requests:

- **Kia:** Kia America, Inc., all of their past and present officers and employees, whether assigned to their principal offices or any of their field or other locations, including all of their divisions, subsidiaries (whether or not incorporated) and affiliated enterprises and all of their headquarters, regional, zone and other offices and their employees, and all agents, contractors, consultants, attorneys and law firms and other persons engaged directly or indirectly (e.g., employee of a consultant) by or under the control of Kia (including all business units and persons previously referred to), who are or were involved in any way with recalls of Kia vehicles.
- **Document:** “Document(s)” is used in the broadest sense of the word and shall mean all original written, printed, typed, recorded, or graphic matter whatsoever, however produced or reproduced, of every kind, nature, and description, and all non-identical copies of both sides thereof, including, but not limited to, papers, letters, memoranda,

correspondence, communications, electronic mail (e-mail) messages (existing in hard copy and/or in electronic storage), faxes, mailgrams, telegrams, cables, telex messages, notes, annotations, working papers, drafts, minutes, records, audio and video recordings, data, databases, other information bases, summaries, charts, tables, graphics, other visual displays, photographs, statements, interviews, opinions, reports, newspaper articles, studies, analyses, evaluations, interpretations, contracts, agreements, jottings, agendas, bulletins, notices, announcements, instructions, blueprints, drawings, as-builts, changes, manuals, publications, work schedules, journals, statistical data, desk, portable and computer calendars, appointment books, diaries, travel reports, lists, tabulations, computer printouts, data processing program libraries, data processing inputs and outputs, microfilms, microfiches, statements for services, resolutions, financial statements, governmental records, business records, personnel records, work orders, pleadings, discovery in any form, affidavits, motions, responses to discovery, all transcripts, administrative filings and all mechanical, magnetic, photographic and electronic records or recordings of any kind, including any storage media associated with computers, including, but not limited to, information on hard drives, floppy disks, backup tapes, and zip drives, electronic communications, including but not limited to, the Internet and shall include any drafts or revisions pertaining to any of the foregoing, all other things similar to any of the foregoing, however denominated by Kia, any other data compilations from which information can be obtained, translated if necessary, into a usable form and any other documents. For purposes of this request, any document which contains any note, comment, addition, deletion, insertion, annotation, or otherwise comprises a non-identical copy of another document shall be treated as a separate document subject to production. In all cases where original and any non-identical copies are not available, "document(s)" also means any identical copies of the original and all non-identical copies thereof. Any document, record, graph, chart, film, or photograph originally produced in color must be provided in color. Furnish all documents whether verified by Kia or not. If a document is not in the English language, provide both the original document and an English translation of the document.

- **Other Terms:** To the extent that they are used in these information requests, the terms "claim," "consumer complaint," "dealer field report," "field report," "fire," "fleet," "good will," "make," "model," "model year," "notice," "property damage," "property damage claim," "rollover," "type," "warranty," "warranty adjustment," and "warranty claim," whether used in singular or in plural form, have the same meaning as found in 49 C.F.R. § 579.4.

The purpose of this request is to evaluate the effectiveness of Kia's remedy program for Safety Recall 25V099 and understand how Kia is responding to vehicle owner's complaints concerning the changes to the procedures used to remedy vehicles.

Accordingly, we require the following information:

1. Detail why Kia placed the TSB for Safety Recall 25V009 on hold and paused the remedy program in April 2025.
2. With respect to Request #1, a description of the data analyzed or considered during this period.
3. Detail why the engine vibration inspection test was revised from requiring a 'cold' engine after the vehicle sits for a minimum of 24 hours to requiring a 'warm' engine with minimum temperatures of 185°F (85°C), including any documents, supporting this revision.
4. With respect to Request #3, a description and documentation of how the revised engine vibration inspection test procedure is expected to effectively identify a vehicle with a damaged engine.
5. The number and percentage of vehicles that failed the engine vibration inspection test where the 'cold' engine was tested after the vehicles sits for a minimum of 24 hours.
6. The number and percentage of vehicles that failed the engine vibration inspection test where the 'warm' engine was tested with minimum temperatures of 185°F (85°C).
7. The number and percentage of vehicles that previously failed the 'cold' engine test but passed the revised 'warm' engine test.
8. A detailed analysis on the difference in failure rate, if any, between the 'cold' engine test and 'warm' engine test populations identified in Requests #5 and #6.
9. Copies of the notices or communications to vehicle owners, if any, informing them of (1) the pause in the remedy program; and/or (2) the need for an engine vibration inspection re-test on a 'warm' engine after completing an engine vibration inspection test on a 'cold' engine.
10. With respect to Request #9, if no copies of communications to owners exist, how Kia communicated remedy developments or changes with affected owners during this period.
11. The number of consumer complaints Kia has received alleging engine or other engine related failures post remedy application and what Kia has done to address those consumer complaints.
12. Warranty coverage, if any, Kia is offering to the vehicles owners where the vehicle has passed either engine vibration inspection tests.
13. Any additional information, including supporting documentation, that may be helpful to explain the effectiveness of Kia's changes to the remedy program and Kia's response, if

any, to complaints of difficulties that vehicle owners are experiencing due to these changes.

Legal Authority for This Request

This letter is being sent to Kia pursuant to 49 U.S.C. § 30166, which authorizes NHTSA to conduct any investigation that may be necessary to enforce Chapter 301 of Title 49 and to request reports. It constitutes a new request for information.

Civil Penalties

Kia's failure to respond promptly and fully to this letter could subject Kia to civil penalties pursuant to 49 U.S.C. § 30165 or lead to an action for injunctive relief pursuant to 49 U.S.C. § 30163. (Other remedies and sanctions are available as well.) The Vehicle Safety Act, 49 U.S.C. § 30165(a)(3), provides for civil penalties of up to \$27,874 per violation per day, with a maximum of \$139,356,994 for a related series of daily violations, for failing or refusing to perform an act required under 49 U.S.C. § 30166. *See* 49 C.F.R. § 578.6(a)(3). This includes failing to respond completely, accurately, or in a timely manner to ODI information requests.

If Kia cannot respond to any specific request or subpart(s) thereof, please state the reason why it is unable to do so. If on the basis of attorney-client, attorney work product, or other privilege, Kia does not submit one or more requested documents or items of information in response to this information request, Kia must provide a privilege log identifying each document or item withheld, and stating the date, subject or title, the name and position of the person(s) from, and the person(s) to whom it was sent, and the name and position of any other recipient (to include all carbon copies or blind carbon copies), the nature of that information or material, and the basis for the claim of privilege and why that privilege applies.

Confidential Business Information

If Kia's response contains any information that you claim is confidential business information (CBI), Kia must submit its request for confidential treatment and any files containing CBI to NHTSA's Office of the Chief Counsel via a secure electronic file transfer link. Please see Enclosure 1 for additional instructions on submitting a request for confidential treatment that is compliant with 49 C.F.R. Part 512 (specifically, a request for confidential treatment must include the four required parts that are discussed in Enclosure 1).

If you choose not to submit your request for confidential treatment and any files containing CBI directly to NHTSA's Office of the Chief Counsel, please notify the investigator referenced in this information request to ensure that the secure file transfer link for your request for confidential treatment and any files containing CBI are directed to the Office of the Chief Counsel accordingly.

In addition to submitting a request for confidential treatment and any files containing CBI directly to NHTSA's Office of the Chief Counsel, Kia must submit a copy of its request for confidential treatment and any files containing CBI directly to ODI via the Safety Defect Investigations (SDI) Portal. For each file submitted through the SDI Portal where CBI is being requested, Kia must check the "Contains CBI" box. In addition, Kia, must submit a redacted

version of each file for which CBI is being requested. The requests for confidential treatments and required certification documents are not considered confidential so these documents should not be marked as "Contains CBI".

Please refer to AQ25001 in Kia's response to this letter and in the request for confidential treatment that Kia may submit.

Due Date

Kia's response to this letter must be submitted to this office within 30 days of receipt of this letter. If Kia finds that it is unable to provide all the information requested within the time allotted, Kia must request an extension using the Safety Defect Investigations (SDI) Portal no later than five business days before the response due date. If Kia is unable to provide all of the information requested by the original deadline, it must submit a partial response by the original deadline with whatever information Kia then has available, even if an extension has been granted.

If you have any questions concerning this matter, please contact Wilson Tran at (202) 366-7732 or by e-mail at wilson.tran@dot.gov.

Sincerely,

Alex Ansley

Alex Ansley, Chief
Recall Management Division
Office of Defects Investigation

ENCLOSURE 1 - INFORMATION FOR REQUESTS FOR CONFIDENTIAL TREATMENT

If you believe that your response contains any material that you claim is confidential business information, submit these materials to NHTSA's Office of the Chief Counsel in accordance with 49 C.F.R. Part 512. **All requests for confidential treatment must be submitted directly to the Office of the Chief Counsel via the Confidential Business Information (CBI) Portal or a secure file transfer link for your submission addressed to the Office of the Chief Counsel. If you are not currently registered for the CBI Portal, you may send a registration request to cbi-helpdesk@dot.gov. In addition to directly submitting the files to the Office of the Chief Counsel, you will also need to submit a copy of your request and files containing CBI directly to ODI through the Safety Defect Investigations (SDI) Portal.**

Requests for confidential treatment are governed by Part 512. A current version of this regulation is available on the internet at <http://www.ecfr.gov> by selecting Title 49 "Transportation," selecting "Parts 500 - 599" and then selecting Part 512 "Confidential Business Information."

How to request confidential treatment:

NHTSA is currently treating electronic submission as an acceptable method for submitting confidential business information to the agency under Part 512. If you claim that any of the information or documents provided in your response constitutes confidential business information within the meaning of 5 U.S.C. § 552(b)(4), or are protected from disclosure pursuant to 18 U.S.C. § 1905, you must request a secure file transfer link from the ODI contact listed in your Information Request. ODI will copy a representative from the Office of the Chief Counsel on the secure file transfer link for your request for confidential treatment. You must submit supporting information together with the materials that are the subject of the confidentiality request, in accordance with Part 512, to the Office of the Chief Counsel. Do not send a hardcopy of a request for confidential treatment to NHTSA's headquarters.

Your request must include a request letter that contains supporting information, pursuant to Part 512.8. Your request must also include a certificate, pursuant to Part 512.4(b) and Part 512, Appendix A.

You are required to submit one unredacted "confidential version" of the information for which you are seeking confidential treatment. Pursuant to Part 512.6, the words "ENTIRE PAGE CONFIDENTIAL BUSINESS INFORMATION" or "CONFIDENTIAL BUSINESS INFORMATION CONTAINED WITHIN BRACKETS" (as applicable) must appear at the top of each page containing information claimed to be confidential. In the latter situation, where not all information on the page is claimed to be confidential, identify each item of information for which confidentiality is requested within brackets: "[]."

You are also required to submit one redacted "public version" of the information for which you are seeking confidential treatment. Pursuant to Part 512.5(a)(2), the redacted "public version" should include redactions of any information for which you are seeking confidential treatment (i.e., the only information that should be unredacted is information for which you are not seeking confidential treatment).

For questions about a request for confidential treatment, please contact Dan Rabinovitz in the Office of the Chief Counsel at Daniel.Rabinovitz@dot.gov or (202)366-8534.

