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HONDA

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

September 30, 2025

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 EA25004-01

Added on September 30, 2025:

Per our meeting, on September 29, 2025, explaining the error with the 2017 & 2018 MDX production quantities, this revised IR response letter has the following corrections:

- 1. The table included in the response to request #1 (Subject Vehicle production quantities) has been updated to correct the quantities for the 2017 & 2018 MDX.***
- 2. The VIN list file that is referenced in the response to request #1 has been updated and the updated file name is referenced in the response to request #1***

Dear Ms. Yukevich,

In reply to the Information Request (IR) letter dated April 14, 2025, Honda is submitting this response regarding your investigation (EA25-004). Please contact us if there are any questions on our submission.

Respectfully,

AMERICAN HONDA MOTOR CO., INC.

Andrea Martin
Senior Director
Product Regulatory Office

AM:tk

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 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).

Provide the table in Microsoft Access 2010, or a compatible format, entitled "PRODUCTION DATA."

Response:

The number of Subject Vehicles Honda has manufactured for sale or lease in the United States:

Source	Honda CoreMQ System
Date the information was gathered	4/30/2025

Model	MY	Number of vehicles manufactured for sale or lease in the US
MDX	2016	13,602
MDX	2017	16,058 (corrected)
MDX	2018	5,580 (corrected)
MDX	2019	49,954
MDX	2020	76,950
PASSPORT	2019	42,544
PASSPORT	2020	27,394
PASSPORT	2021	59,568
PASSPORT	2022	39,525
PASSPORT	2023	44,022
PASSPORT	2024	23,922
PASSPORT	2025	19,835
PILOT	2016	54,843
PILOT	2017	59,822
PILOT	2018	27,880
PILOT	2019	51,351
PILOT	2020	34,688
PILOT	2021	150,599
PILOT	2022	143,897
RIDGELINE	2020	32,876

RIDGELINE	2021	27,293
RIDGELINE	2022	39,720
RIDGELINE	2023	68,533
RIDGELINE	2024	33,326
RIDGELINE	2025	34,078
TLX	2015	10,846
TLX	2016	4,672
TLX	2017	3,625
TLX	2018	6,929
TLX	2019	7,211
TLX	2020	4,432

For the PRODUCTION DATA, please see the file named:

- ***PE25-004 - R1 (PRODUCTION DATA) V2 - CONFIDENTIAL.xlsx***

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

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;
 - 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.

Response:

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For the additional information requested, please see the included file titled:

- PE25-004 - R2 (Additional Info) – 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 property damage is alleged;
 - l. Number of alleged injuries, if any; and
 - m. Number of alleged fatalities, if any.

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

Response:

For the table of complaints, please see the included file titled:

- EA25-004 - 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 copies of complaints, please see the included files titled:

- PE25-004 - Legal cases - CONFIDENTIAL.pdf
- PE25-004 - techline reports - CONFIDENTIAL.pdf
- PE25-004 - field reports - CONFIDENTIAL.pdf
- PE25-004 - client relations cases - CONFIDENTIAL.pdf

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Detailed description of the search method and criteria used to identify the items in response to REQUEST NUMBER TWO:

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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;
- o. Date of application of the first level countermeasure;
- p. Date of application of the second level countermeasure; and
- q. 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:

Total count of warranty claims:

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

- EA25-004 – R5 (WARRANTY DATA) – CONFIDENTIAL.xlsx

6. State the terms of any campaigns or extended warranties related to subject system and/or alleged defect, 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 campaigns or extended warranties that Honda offered for the subject vehicles and state by option, model, and model year, the number of vehicles that are covered under each. Also, any terms which may apply to repairs to the subject system after the application of any campaigns/extended warranties.

Response:

Terms of the PUD (Product Update):

- *indefinite (no expiry)*

Terms of the WE (Warranty Extension):

- *10 years from original purchase, no mileage limit*
- *Applicable vehicle must not have cancelled warranty*

For the PUD & WE coverage by option, model & MY, please see the included file titled:

- *"EA25-004 IR Response R6.2 - CONFIDENTIAL.xlsx"*

For "any terms which may apply to repairs to the subject system after the application of any campaigns/extended warranties":

- *There is no warranty coverage beyond what is stated above for the PUD & WE*
- *Under certain circumstances, Honda may exercise the option to extend "goodwill" coverage, on a case-by-case basis*

7. Produce copies of all campaigns, extended warranties, 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. Provide the date(s) of issue and method of communication used for each document. Also include the latest draft copy of any communication that Honda is planning to issue within the next 120 days.

Response:

The below communications were sent to dealerships and regional offices via the Honda "iN" (interactive Network) communication system/website.

For copies of relevant bulletins, please see the files titled:

- *A23-008 v1 1-6-2023.pdf*
- *A23-008 v2 1-25-2023.pdf*
- *B22-008 v1 3-30-2022.pdf*
- *B22-008 v2 4-8-2022.pdf*
- *PUD 22-008 15_20 TLX v3.pdf*
- *B22-009 v1 3-30-2022.pdf*
- *B22-009 v2.pdf*
- *B23-001 v1 1-6-2023.pdf*
- *B23-001 v2 1-27-2023.pdf*
- *PUD 23-001 16_20 22_23 MDX v3.pdf*

- *B23-002 v1 1-6-2023.pdf*
- *B23-002 v2.pdf*
- *A23-009.pdf*
- *WE 23-010 21_22 Passport_Pilot 21_23 Ridgeline.pdf*

For copies of relevant PUD & WE communications, please see the summary table file titled:

- *EA25-004 IR Response R7 - PUD-WE communications.xlsx*

Some of these documents were physically mailed to affected customers and some of the information was communicated to dealers via "iN". The above summary file indicates the method used for each communication.

The following files, as listed in the table referenced above, are also provided separately:

- *acura_compliance co-20727 sc8 rev2.pdf*
- *acura_compliance co-20729 gc9 rev1.pdf*
- *6T6 Acura Reimbursement letter_r1.pdf*
- *57876_honda_co-24368.pdf*
- *57885_honda_co-24360.pdf*
- *57876_acura_co-24365.pdf*
- *57885_acura_co-24359.pdf*
- *6T6 Honda Reimbursement letter_r1.pdf*
- *6T6 Acura Reimbursement letter_r1.pdf*
- *Acura_CO-25936_REV 6-23-23.pdf*
- *6ax_honda_compliance kfz rev1.pdf*
- *6ax_acura_compliance ufy rev1.pdf*
- *Honda_6AX_CO-66707_R1.pdf*
- *Acura_6AX_CO-66706.pdf*
- *Honda CO-115705_OL.pdf*
- *Acura_UFY_CO-115704_OL.pdf*
- *iN Msg-6AX 6T6 v3.docx*
- *iN Msg-Expansion 6AX 6T6 v2.docx*
- *in msg-6ax expansion_ody-mdx.docx*

8. 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:
- Action title or identifier;
 - The actual or planned start date;
 - The actual or expected end date;
 - Brief summary of the subject and objective of the action;
 - Engineering group(s)/supplier(s) responsible for designing and for conducting the action; and
 - 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:

The below included file summarizes the activities related to request number 8:

- EA25-004 - R8 related summary - CONFIDENTIAL.xlsx*

Also included are the following documents summarized in the above file:

- 200327_10th MM Document -en NHTSA_CONFIDENTIAL.pdf*
- 2016 MDX Standard Verification of General Engine Drive-ability_CONFIDENTIAL.pdf*
- 2016 MDX Standard Verification of High Altitude Engine Drive-ability_CONFIDENTIAL.pdf*
- 2016 MDX Standard Verification of Intense Heat Engine Drive-ability_CONFIDENTIAL.pdf*
- 2016 MDX Engine ECU Control Calibration AIS Fuel Enrichment_CONFIDENTIAL.pdf*
- 2016 MDX Engine ECU Control Calibration Dynamic Verification_CONFIDENTIAL.pdf*
- 2016 MDX Engine ECU Control Calibration AIS Engine Torque Management_CONFIDENTIAL.pdf*
- 2018 MDX Engine ECU Control Calibration Starter Retraction Engine Speed_CONFIDENTIAL.pdf*
- 2019 MDX Pilot Engine ECU Control Calibration Steering Angle Inhibit_CONFIDENTIAL.pdf*
- 2019 MDX Engine ECU Control Calibration Traffic Inhibit_CONFIDENTIAL.pdf*
- 2016 MDX Final Dynamic Review_CONFIDENTIAL.pdf*
- 2016 MDX Final Overall Technical Review_CONFIDENTIAL.pdf*
- 2016 MDX Standard Verification of General Engine Drive-ability Details_CONFIDENTIAL.pdf*
- 2016 MDX Standard Verification of High Altitude Engine Drive-ability Details_CONFIDENTIAL.pdf*
- 2016 MDX Standard Verification of Intense Heat Engine Drive-ability Details_CONFIDENTIAL.pdf*
- 2021 Passport Final Dynamic Review_CONFIDENTIAL.pdf*
- 2021 Passport Final Function Technical Signoff_CONFIDENTIAL.pdf*
- 2021 Passport Final Overall Technical Review_CONFIDENTIAL.pdf*
- 2023 Passport Final Dynamic Review_CONFIDENTIAL.pdf*
- 2023 Passport Final Function Technical Signoff_CONFIDENTIAL.pdf*
- 2023 Passport Final Overall Technical Review_CONFIDENTIAL.pdf*

- *2023 Passport_Verification of OBD_CONFIDENTIAL.pdf*
- *2016 Pilot Standard Verification of General Engine Drivability_CONFIDENTIAL.pdf*
- *2016 Pilot Standard Verification of High Altitude Engine Drivability_CONFIDENTIAL.pdf*
- *2016 Pilot Standard Verification of Intense Heat Engine Drivability_CONFIDENTIAL.pdf*
- *2016 Pilot Engine ECU Control Calibration AIS Fuel Enrichment_CONFIDENTIAL.pdf*
- *2019 Pilot Engine ECU Control Calibration_AIS various calibration_CONFIDENTIAL.pdf*
- *2019 Pilot Engine ECU AIS engine response refire calibration_CONFIDENTIAL.pdf*
- *2016 Pilot Final Overall Technical Review_CONFIDENTIAL.pdf*
- *2016 Pilot Standard Verification of General Engine Drivability Details_CONFIDENTIAL.pdf*
- *2016 Pilot Standard Verification of Post-Durability Mode Engine Drivability Details_CONFIDENTIAL.pdf*
- *2019 Pilot Standard Verification of Knock Control System Details_CONFIDENTIAL.pdf*
- *2021 Ridgeline Standard Verification of General Engine Drivability_CONFIDENTIAL.pdf*
- *3CJ_3CP MP1 MASK Startability_Idle Stop_CONFIDENTIAL.pdf*
- *2020 Ridgeline Final Overall Technical Review_CONFIDENTIAL.pdf*
- *2022 Ridgeline Final Dynamic Review_CONFIDENTIAL.pdf*
- *2022 Ridgeline Final Function Technical Signoff_CONFIDENTIAL.pdf*
- *2022 Ridgeline Final Overall Technical Review_CONFIDENTIAL.pdf*
- *2024 Ridgeline Final Dynamic Review_CONFIDENTIAL.pdf*
- *2024 Ridgeline Final Function Technical Signoff_CONFIDENTIAL.pdf*
- *2024 Ridgeline Final Overall Technical Review_CONFIDENTIAL.pdf*
- *2ZQ Maru-Q_IdleStop_rev1_AHS_CONFIDENTIAL.pdf*
- *2024 Ridgeline Standard Verification of AIS System Details_CONFIDENTIAL.pdf*
- *2015 TLX Standard Verification of Drivability Details_CONFIDENTIAL.pdf*
- *2015 TLX Engine ECU Control Calibration AIS various calibration_CONFIDENTIAL.pdf*
- *2015 TLX Engine ECU Control Calibration AIS enable conditions calibration_CONFIDENTIAL.pdf*
- *2015 TLX Engine ECU Control Calibration AIS start-ability calibration_CONFIDENTIAL.pdf*
- *2015 TLX Engine ECU Control Calibration AIS engine speed control calibration_CONFIDENTIAL.pdf*
- *2018 TLX Engine ECU Control Calibration AIS various calibration_CONFIDENTIAL.pdf*
- *2015 TLX Final Dynamic Review_CONFIDENTIAL.pdf*
- *2015 TLX Final Overall Technical Review AIS_CONFIDENTIAL.pdf*
- *2015 TLX Standard Verification of Owners Manual Details_CONFIDENTIAL.pdf*
- *2015 TLX Standard Verification of Drivability_Details_CONFIDENTIAL.pdf*

9. 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;

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- 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:

Please see the included files listed below for a summary of the changes and related files.

- EA25-004 R9 Design change history_CONFIDENTIAL.xlsx

10. 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. 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);

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- 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. *The reports included with this inquiry.
For Honda's analysis of the VOQ reports included with this inquiry, please see the included file (name below).*

- EA25-004_R10f_reports included analysis_CONFIDENTIAL.xlsx*