



Kia America, Inc.
Corporate Headquarters
111 Peters Canyon Road, Irvine, CA 92606-1790 USA

VIA ELECTRONIC SUBMISSION

June 27, 2025

Peter Kivett, VDD-C Chief
Office of Defects Investigation
U.S. Department of Transportation
National Highway Traffic Safety Administration
1200 New Jersey Avenue, S.E.
Washington D.C. 20590

Re: **Preliminary Evaluation (PE25004-01);**
Windshield Wiper Failure or Malfunction
(MY) 2024-2025 Kia EV9

Dear Mr. Kivett:

This letter contains Kia's initial response to Request Nos. 1-14 of your letter dated May 15, 2025 (Reference PE25004-01). Pursuant to the extension granted on June 24, 2025, Kia will submit its responses to Request Nos. 15 and 16 on or before July 18, 2025.

REQUEST NO. 1:

State, by model and model year, the number of subject vehicles, Kia has manufactured for sale or lease in the United States. Separately, for each subject vehicle manufactured to date by Kia, 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 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).

RESPONSE TO REQUEST NO. 1:

The number of subject vehicles manufactured for sale or lease in the United States, including the U.S. Territories is being provided. See **TAB A**. A list of the subject vehicles is being provided with this response in Microsoft Access and titled “PRODUCTION DATA.”

The source of the information submitted in response to this request is Kia America, Inc. and Kia Corporation. This information was collected through May 15, 2025.

REQUEST NO. 2:

State the number of each of the following, received by Kia, or of which Kia 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. Reports involving allegations of smoke and/or fire;
- e. Property damage claims;
- f. Third-party arbitration proceedings, both pending and closed, where Kia is or was a party to the arbitration; and
- g. Lawsuits, both pending and closed, in which Kia 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 Kia’s assessment of the problem, with a summary of the significant underlying facts and evidence. For item “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 TO REQUEST NO. 2:

A chart summarizing the total of each of the items requested in 2(a) through (g) is submitted contemporaneously with this response. See **TAB B**.

The source of the information submitted to this request is Kia America, Inc. and Kia Corporation. The data was collected through May 15, 2025.

REQUEST NO. 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. Kia'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 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. Report or claim date (MM/DD/YYYY);
- j. Whether the consumer had to pull over the vehicle while driving;
- k. Whether a crash is alleged;
- l. Whether smoke and/or fire is alleged;
- m. Whether property damage is alleged;
- n. Number of alleged injuries, if any; and
- o. Number of alleged fatalities, if any.

RESPONSE TO REQUEST NO. 3:

A separate list of the responsive communications is provided under the category "REQUEST NUMBER TWO DATA" and is submitted contemporaneously with this response.

The source of the information submitted in response to this request is Kia America, Inc. and Kia Corporation. The data was collected through May 15, 2025.

REQUEST NO. 4:

Produce copies of all documents related to each item within the scope of Request No. 2. Organize the documents by category (i.e., consumer complaints, field reports, etc.) and describe the method Kia used for organizing the documents. Describe in detail the search methods and search criteria used by Kia to identify the items in response to Request No. 2.

RESPONSE TO REQUEST NO. 4:

Copies of the documents responsive to Request No. 2 are organized electronically and titled Consumer Complaints (CC) and Techline Reports. No responsive Field Reports, lawsuits, or arbitrations were identified.

Kia's search included all Consumer Complaints, Field Reports, and Techline Reports generated

through May 15, 2025 using the key word “wiper%”. Those cases were then reviewed for any failure or malfunction of the front windshield wiper and provided in response to this request. With respect to CC reports, Kia is not always able to extract incident date information in an automated manner from the source system. However, all incident date information was included with this response to the extent it was available. As to lawsuits and arbitrations, Kia’s search included all lawsuits and arbitrations using the search term “wiper%” of which Kia received notice of on or before May 15, 2025.

The source of the information submitted in response to this request is Kia America, Inc.

REQUEST NO. 5:

State, by model and model year, a total count for all of the following categories of claims, collectively, that have been paid by Kia 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. Kia’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. 17-character VIN;
- e. Vehicle’s make, model and model year (please use distinct field for each data type);
- f. Repair date (MM/DD/YYYY);
- g. Vehicle mileage at time of repair;
- 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.

RESPONSE TO REQUEST NO. 5:

A list of the warranty claims identified as a result of the search specified in Kia’s response to Request No. 6 is provided in Microsoft Access under the category “WARRANTY DATA”. In addition, Kia is also providing a list of goodwill claims approved by Kia’s Customer Care Center

under the category “WARRANTY DATA 2”.

The source of the information submitted in response to this request is Kia America, Inc., and Kia Corporation. The data was collected through May 15, 2025.

REQUEST NO. 6:

Describe in detail the search methods and search criteria used by Kia 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 TO REQUEST NO. 6:

Kia searched for all windshield wiper and motor repair/replacement warranty claims associated with the part numbers identified in Kia’s response to Request No. 12 through May 15, 2025 for the subject vehicles. Those claims were then reviewed and claims related to or may be related to the alleged defect are being provided in response to Request No. 5.

The source of the information submitted in response to this request is Kia America, Inc., and Kia Corporation.

REQUEST NO. 7:

Provide a list of all labor operations, labor operation descriptions, problem codes and problem code descriptions, trouble codes, and diagnostic trouble code descriptions applicable to the alleged defect in the subject vehicles. States 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 TO REQUEST NO. 7:

The labor operation codes and labor operation descriptions have been included as part of the WARRANTY DATA submitted in response to Request No. 5.

In your letter, you requested that Kia provide its “problem code” information. Kia refers to the “problem code” as the “cause code” which carries a letter “C” and reflects the technician’s evaluation of the cause of the problem. You also requested that Kia provide information regarding the “concerns stated by the customer.” These are commonly referred to as “nature codes” and carry the “N” designation. These reflect the service writer’s or technician’s understanding of the customer’s concern and are included in the claim data submitted in response to Request No. 5. A description of the problem codes used for a specific claim are also listed in the WARRANTY DATA. In addition, DTC codes are automatically transmitted to the warranty database. There are no DTCs associated with the alleged defect.

The source of the information submitted in response to this request is Kia America, Inc. and Kia Corporation.

REQUEST NO. 8:

State, by model and model year, the terms of the new vehicle warranty coverage offered by Kia on the subject and peer 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 Kia offered for the subject and peer vehicles and state by option, model, and model year, the number of vehicles that are covered under each such extended warranty.

RESPONSE TO REQUEST NO. 8:

A copy of the Warranty Consumer & Information Manual applicable to the 2024-2025 EV9 vehicles containing the requested information is submitted in response to this request. See **TABS C and D**.

There are no extended warranties applicable to the subject vehicles.

The source of the information submitted in response to this request is Kia America, Inc. This information was collected as of May 15, 2025.

REQUEST NO. 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 Kia 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 Kia is planning to issue within the next 120 days.

RESPONSE TO REQUEST NO. 9:

There are no documents responsive to this request.

The source of the information submitted in response to this request is Kia America, Inc. This information was collected as of May 15, 2025.

REQUEST NO. 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, Kia. 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.

RESPONSE TO REQUEST NO. 10:

A list of the “Actions” responsive to this request is being submitted. See **TAB E and TAB E.1.**

The source of the information submitted in response to this request is Kia America, Inc., and Kia Corporation. The information was collected as of June 4, 2025.

REQUEST NO. 11:

Describe all modifications or changes made by, or on behalf of, Kia 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 Kia is aware of which may be incorporated into vehicle production within the next 120 days.

RESPONSE TO REQUEST NO. 11:

There are no modifications which relate to or may be related to the alleged defect.

The source of the information submitted in response to this request is Kia Corporation. The information was collected as of June 8, 2025.

REQUEST NO. 12:

State the number of each of the following that Kia 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 (*including the cut-off date for sales, if applicable*):

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

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 Kia 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 TO REQUEST NO. 12:

A chart summarizing the requested part sales data, supplier information, and list of other Kia models that contain an identical subject component is being submitted. See **TAB F**. No kits have been released, or developed by Kia for use in service repairs to the subject component.

The source of the information submitted in response to this request is Kia America, Inc., and Kia Corporation. The information was collected as of May 15, 2025.

REQUEST NO. 13:

Describe in detail the design, function and operation of the thermal-overload protection on the wiper motor, which may activate a circuit breaker based on the temperature of the motor, and any software logic that is included.

RESPONSE TO REQUEST NO. 13:

See **TAB G** for the information responsive to this request.

REQUEST NO. 14:

List any other vehicles which share the subject components with the subject vehicles by vehicle's model and model year.

RESPONSE TO REQUEST NO. 14:

See **TAB F** for the information responsive to this Request.

Peter Kivett, Chief
Office of Defects Investigation
June 27, 2025

REQUEST NO. 15:

Furnish Kia's assessment of whether the defects and root causes described in recalls 22V627 and 23V180 are similar to the alleged defect in this investigation.

RESPONSE TO REQUEST NO. 15:

Pursuant to the extension granted by ODI on June 24, 2025, the response to this Request will be provided on July 18, 2025.

REQUEST NO. 16:

Furnish Kia's assessment of the alleged defect in the subject vehicles, including:

- a. The root cause and all 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 is about to occur; and
- f. The reports referenced with this inquiry.

RESPONSE TO REQUEST NO. 16:

Pursuant to the extension granted by ODI on June 24, 2025, the response to this Request will be provided on July 18, 2025.

If you have any questions or if you need anything further, please do not hesitate to contact me.

Sincerely,



Jurassic park (Jun 27, 2025 09:42 PDT)
J.S. (Jurassic) Park
Vice President, Chief Safety Officer