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HONDA

American Honda Motor Co., Inc.
1919 Torrance Boulevard
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January 22, 2026

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 PE25018-01

Dear Ms. Yukevich,

In reply to the Information Request (IR) letter dated November 18, 2025, Honda is submitting this response. Honda requested and received a due date extension for all Questions, except for Question #1, with a new due date of January 26, 2026. Please let us know if there are any questions.

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 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 System part number and design version(s) 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, leased, or delivered for sale or lease (postal abbreviation).

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

Response:

For the production data, please see the following included file:

- *PE25018_R1_PRODUCTION DATA_CONFIDENTIAL.xlsx*

NOTE:

- *The first tab/sheet in the Excel file contains the production volume information*
- *The second tab contains the VIN list and related requested data*
- *The third tab contains information related to the relevant part number and application*

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. 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:

	Quantity
a. Consumer complaints, including those from fleet operators;	92
b. Field reports, including dealer field reports;	28
c. Reports involving a crash, injury, or fatality;	28
d. Property damage claims; and	1
e. Third-party arbitration proceedings where American Honda Motor Co. is or was a party to the arbitration; and	3
f. Lawsuits, both pending and closed, in which American Honda Motor Co. is or was a defendant or codefendant.	0

Source	(1) CR database, (2) Techline database (3) Field Report database & (4) Legal database (ALMA)
Last date the information was gathered	(1) 12/03/2025, (2) 11/21/2025 (3) 11/21/2025 & (4) 11/21/2025

For summaries of additional information for items “c” through “f”, please see the attached file titled:

- PE25018_R2_Legal Claims Additional Information_CONFIDENTIAL.xlsx
- PE25018_R2_CR Additional Information_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 (numeric data type);
 - 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;
 - m. Number of alleged fatalities, if any;
 - n. Whether vehicle was inspected;
 - o. Whether Event Data Recorder (EDR) was collected;
 - p. Whether the left, right, or both curtain and/or thorax air bags deployed;
 - q. Whether the driver and/or passenger seat belt pretensioner deployed;
 - r. Whether any parts were returned for analysis; and
 - s. Whether Honda identified the root cause of the deployment;
 1. If yes, provide the root cause analysis as a response to Request No. 4.

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 "s", please see the included file titled:

- PE25018_R3_REQUEST NO 2 DATA_CONFIDENTIAL.xlsx

4. Produce copies of all documents related to each item within the scope of Request No. 2 (including EDR reports and root cause analyses). Organize the documents separately by Honda's file number or other identifier used and by category (i.e., consumer complaints, field reports, etc.). 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:

Please see the included files:

- PE25018_R4_techline_CONFIDENTIAL.pdf
- PE25018_R4_Legal Cases_CONFIDENTIAL.pdf
- PE25018_R4_CR Cases_CONFIDENTIAL.pdf
- PE25018_R4_Search Method_CONFIDENTIAL.pdf

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 and Peer 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. Additional comments, if any, by dealer/technician relating to claim and/or repair;
- p. Whether vehicle was inspected;

- q. Whether Event Data Recorder (EDR) was collected;
- r. Whether the left, right, or both curtain and/or thorax air bags deployed;
- s. Whether the driver and/or passenger seat belt pretensioner deployed; and
- t. Whether any parts were returned for analysis.

Provide this information in Microsoft Excel, or a compatible format, entitled "WARRANTY DATA."

Response:

Please see the included file titled:

- PE25018_R5_Warranty Count-Data_Method_CONFIDENTIAL.xlsx

6. Produce copies of all event data records (e.g. Honda's root cause analysis, EDR reports, vehicle control history, etc.) related to each item within the scope of Request No. 5. Organize the documents separately by Honda's claim number. Describe in detail the search methods and search criteria used by Honda to identify the items in response to Request No. 5.

Response:

Please see the included files:

- 5FNRL6H7XKB019968_EDR_CONFIDENTIAL.pdf
- 5FNRL6H7XKB019968_HEX Decryption_CONFIDENTIAL.xlsx
- 5FNRL6H26JB110819_HEX Decryption_CONFIDENTIAL.xlsx
- 5FNRL6H53JB033286_HEX Decryption_CONFIDENTIAL.xlsx
- 5FNRL6H75LB004506_EDR_CONFIDENTIAL.pdf
- 5FNRL6H75LB004506_HEX Decryption_CONFIDENTIAL.xlsx
- 5KBRL688XKB801732_SRS ECU MEMORY MAP DOWNLOAD_CONFIDENTIAL.xlsx
- 5KBRL6860KB900044_HEX Decryption_20201208_CONFIDENTIAL.xlsx
- 5KBRL6860KB900148_HEX Decryption_CONFIDENTIAL.xlsx
- 5KBRL6869JB801086_HEX Decryption_CONFIDENTIAL.xlsx
- 5KBRL6881KB801781_SRS ECU MEMORY MAP DOWNLOAD_CONFIDENTIAL.xlsx

7. 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:

Please see the included file titled:

- PE25018_R5_Warranty Count-Data_Method_CONFIDENTIAL.xlsx

8. Provide a list of all labor operations, labor operation descriptions, problem codes, problem code descriptions, diagnostic trouble codes, and diagnostic trouble code descriptions applicable to the Alleged Defect in the Subject and Peer 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:

Please see the included file titled for Labor Op Codes/Defect Codes (similar to "problem codes) and descriptions:

- PE25018_R8_Labor Ops_CONFIDENTIAL.xlsx

NOTE: No particular DTC is associated with the Alleged Defect.

9. State, by make and model year, the terms of the new vehicle warranty coverage offered by Honda on the Subject and Peer Vehicles concerning the Subject System (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 and Peer Vehicles related to the Subject System and state by option, model, and model year, the number of vehicles that are covered under each such extended warranty.

Response:

New vehicle warranty coverage:

- 2018 – 2023 MY Honda Odyssey warranty coverage for the Subject System: 36 months/36,000 miles

Please see the included file titled for extended warranty sales data (Honda product name: Vehicle Service Contract [VSC]):

- PE25018_R9_VSC sales_CONFIDENTIAL.xlsx

10. Produce copies of all service, warranty, and other documents that relate to, or may relate to, the Alleged Defect in the Subject and Peer 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 were no documents issued.

11. 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 and Peer 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.

Response:

Please see the included files:

- *PE25018_R11_Summary Table_CONFIDENTIAL.xlsx*
- *PE25018_R11_MM Theme-Up Report 20210818_CONFIDENTIAL.pdf*
- *PE25018_R11_MM Update Report 20210908_CONFIDENTIAL.pdf*
- *PE25018_R11_MM CM Report 20211022_CONFIDENTIAL.pdf*
- *PE25018_R11_MM Final Report_20220207_CONFIDENTIAL.pdf*

12. 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 and its related components, from the start of production to date, which relate to, or may relate to, the Alleged Defect in the Subject and Peer 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:

Please see the included file titled:

- *PE25018_R12_Change History summary_CONFIDENTIAL.xlsx*

13. State the number of each of the following that Honda has sold that may be used in the Subject and Peer 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 Systems and their related components;
- b. Similar or substantially similar systems and their related components; and
- c. Any kits that have been released, or developed, by Honda for use in service repairs to the Subject System/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:

Please see the included file titled:

- *PE25018_R13_Parts Sales Data_CONFIDENTIAL.xlsx*

14. Describe in detail the design intent sequence of events that leads to the ideal performance of the Subject System, and include:
- a. Any diagram(s) or schematic(s) necessary; and
 - b. Air bag deployment filters and maps, including threshold parameters.

Response:

Please see slides 28-29 (side crash sensing logic/algorithm) and slides 35-36 (crash parameter threshold settings) in the included file as part of response for Question 11, titled:

- *PE25018_R11_MM Final Report_20220207_CONFIDENTIAL.pdf*

15. Describe in detail any and all differences in deployment strategies and collision sensing between the Subject and Peer Vehicles during both side impact and rollover events.

Response:

Please see slides 35-36 (crash parameter threshold settings) in the included file as part of response for Question 11, titled:

- *PE25018_R11_MM Final Report_20220207_CONFIDENTIAL.pdf*

16. Furnish Honda's assessment of the Alleged Defect in the Subject and Peer 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; and

- 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; and
- f. The reports included with this inquiry.

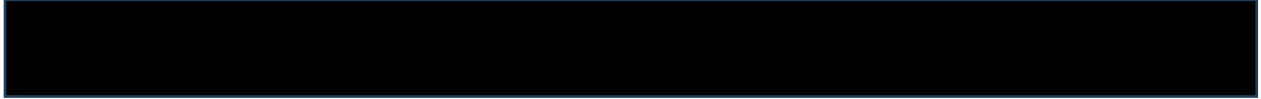
Response:

For issue background explanatory information, please see the included file titled:

- PE25018_R16_Background Info_CONFIDENTIAL.pdf

a. The causal or contributory factor(s);

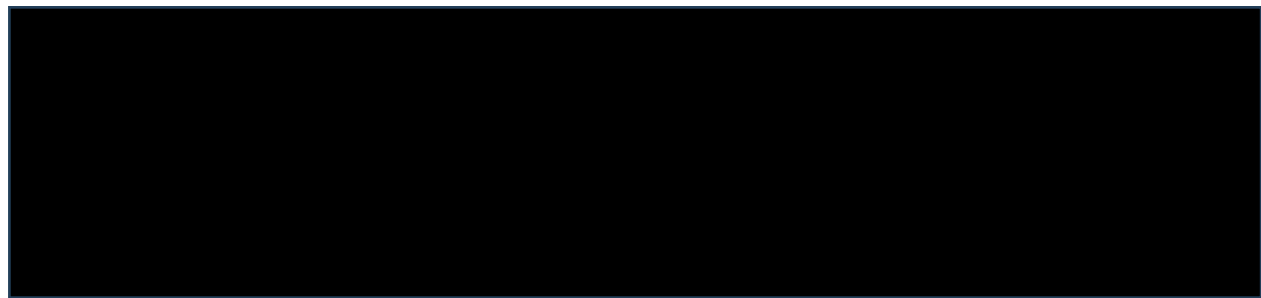
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b. The failure mechanism(s);

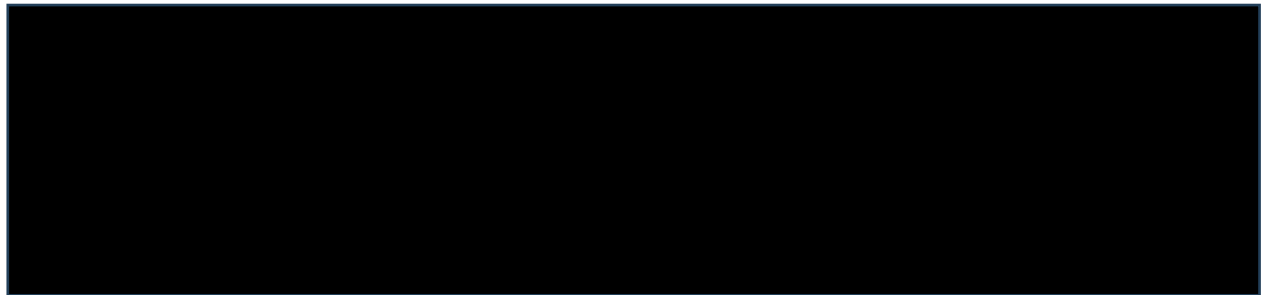
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c. The failure mode(s);

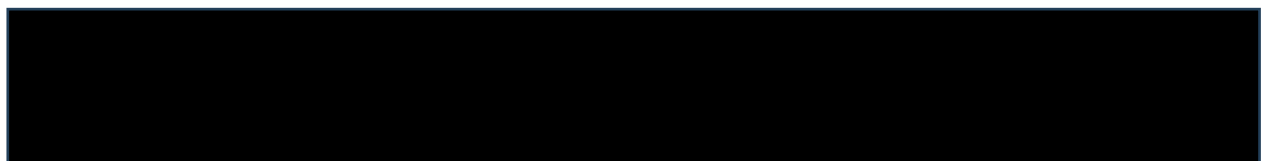
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d. The risk to motor vehicle safety that it poses;

[[



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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;

[[

[REDACTED]

]]

f. *The reports included with this inquiry.*

[[

[REDACTED]

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For Honda's analysis of the VOQ reports included with this inquiry, please see the included files:

- *PE25018_R16_VOQ Analysis_CONFIDENTIAL.pdf*