

FORMAL PETITION FOR DEFECT INVESTIGATION UNDER 49 CFR PART 552

Nathaniel W. Bowe III

May 30, 2026

[REDACTED]
Peachtree City, GA [REDACTED]
[REDACTED]

VIA CERTIFIED MAIL
RETURN RECEIPT REQUESTED

TO:

Administrator
National Highway Traffic Safety Administration
1200 New Jersey Avenue SE, West Building
Washington, DC 20590

Dear Administrator,

Pursuant to 49 U.S.C. § 30162 and 49 CFR Part 552, I am submitting this formal petition to request that the National Highway Traffic Safety Administration (NHTSA) commence a proceeding to determine whether a safety-related defect exists in the vehicle population identified below.

Anomalous, un-commanded component behavior inside these vehicles poses an immediate, unreasonable risk of injury or death to occupants, necessitating an official Office of Defects Investigation (ODI) inquiry and a subsequent safety recall (reference NHTSA case 11733930).

I. Identification of Target Vehicle Population (49 CFR § 552.4)

This petition concerns the following vehicle population and system components:

- **Make:** Honda
- **Model:** Odyssey
- **Model Year(s):** 2011-2017
- **Affected Component / System:** Supplemental Restraint System (SRS) / Airbag Control Module (ACM)

II. Substance of the Requested Order

The petitioner requests that the Administrator initiate a formal Defect Petition (DP) proceeding to investigate the un-commanded and anomalous deployment behavior of the Supplemental Restraint System in the target vehicle population, and to issue an order directing the manufacturer to notify owners and remedy this safety-related defect.

III. Statement of Facts and Technical Evidence

The underlying component suffers from a systemic electronic, software, or mechanical defect that causes critical safety systems to trigger without an appropriate environmental stimulus (e.g., a 'ghost deployment' or un-commanded actuation absent any physical impact, rollover event, or G-force threshold breach).

This behavior constitutes an extreme safety hazard, as unexpected deployment can cause severe blunt-force trauma to occupants, permanently damage hearing, obstruct driver visibility, and cause immediate loss of vehicle control. I created a NHTSA case (11733930) associated with the event I was involved in and *my wife was injured*. Additionally, I have continued to email updates to the generic email address given to me by a NHTSA representative over the phone

The existence of this defect across the vehicle population is supported by the following forensic and statistical evidence:

1. Diagnostic Trouble Codes (DTCs) disagreement:

Attached as Exhibit A are the unedited pre- and post-event system scans from an OEM-level diagnostic tool provided by a Honda Dealership. The SRS DataList confirms the Left and Right Front Airbags are "ON" (Deployed). However, the SRS System Permanent DTC report states "**No DTC was found.**" The vehicle's safety logic fired the airbags but was incapable of recognizing or recording the event. No event data recorder (EDR) data exists, including but not limited to: the speed of the vehicle, timing of the deployment, which impact sensor measured, impact, etc. In essence, the SRS system failed to record any activity indicates internal component resistance failure or a critical micro-controller communication glitch.

2. SRS system disagreement:

The SRS system shows a driver's side deployment which did not occur. The safety system and associated computer do not agree with what actually happened and what is clear upon visual inspection: the passenger side airbag deployed, the driver's side did not and no record was made in the Permanent DTC.

3. Documented Trend / Public Statistical Evidence:

This is not an isolated incident. A review of the public NHTSA database reveals a documented pattern of similar component failures among at least ten (10) other owners of this exact vehicle population (2011-2017). Online forums (Odyclub, Reddit, etc.) also yield other claims of this happening even if NHTSA complaints were not filed. Furthermore, the SRS ECU is the same manufacturer (Denso) as the ECU in the current NHTSA recall campaign 26V227 which has similar incongruencies among Odyssey electrical components. The adjacency in model years to the next generation which has experienced enough instances to initiated a recall of 440,000 vehicles means this is a statistically significant event. There are an estimated 800,000-900,000 fourth generation (2011-2017) still on U.S. roads that may have a substantial safety risk.

4. Manufacturer Awareness:

The manufacturer has demonstrated implicit awareness of instability in this system, as shown by the active recall campaign for a different population of vehicles. Honda claims there was frame damage found which they would not describe or prove with photos. Even if there was frame damage, it does not explain why the SRS systems failed as stated in points 1 and 2 above. In conversations I have had

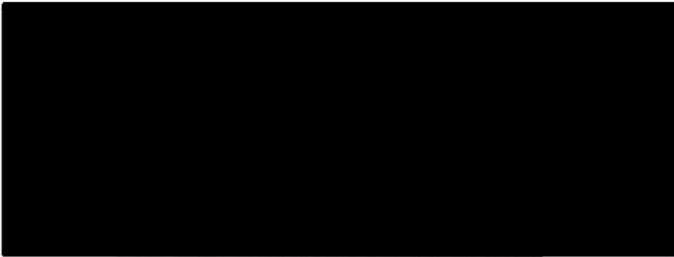
directly with Honda, they are unwilling to provide any information from their independent investigation to directly answer my questions or refute my accusations of similarity between the activity in this generation (model year 2011-2017) and recall 26V227. I cannot provide any written communication with Honda on my case because they have repeatedly refused to communicate with me in writing and only via phone, including refusing to leave voicemail messages with updates.

IV. Conclusion

The objective data demonstrates that the target vehicle population contains a critical electronic or logical defect that causes unexpected safety-system deployment, creating an unreasonable risk to public safety on American roadways.

The petitioner respectfully requests that NHTSA grant this petition, assign it a Defect Petition (DP) action number, and initiate a formal engineering review to compel the manufacturer to rectify this hazard.

Respectfully submitted,



Nathaniel W. Bowe III

Petitioner

Enclosures / Exhibits Attached:

- Honda All DTC Test Certification (dated 04/29/2026)
- Honda SRS DataList Report (showing ECU Maker: DENSO)
- Photos of Deployment



All DTC Test Certification

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Name _____

Model _____ ODYSSEY

VIN _____

System	DTC Code	Description
PGM-FI Permanent DTC	No DTC was found	
PGM-FI Temporary DTC	No DTC was found	
A/T Permanent DTC	No DTC was found	
A/T Temporary DTC	No DTC was found	
SRS System Permanent DTC	No DTC was found	
Seat Weight Sensor Permanent DTC	No DTC was found	
HONDA ABS Permanent DTC	83-1	PGM-FI MALFUNCTION
HONDA ABS Permanent DTC	82-1	BATTERY VOLTAGE HIGH
HONDA ABS Permanent DTC	81-1	BATTERY VOLTAGE LOW
HONDA ABS Permanent DTC	85-1	BRAKE FLUID LEVEL LOW
HONDA ABS Permanent DTC	86-1	F-CAN COMMUNICATION MALFUNCTION
Tire Pressure Monitoring System Permanent DTC	No DTC was found	
One-Push Start (PCU) Permanent DTC	B12D3	Power Control Unit IG Latch Circuit Error
One-Push Start (BACKUP ECU) Permanent DTC	No DTC was found	
One-Push Start (KEYLESS ACCESS CONTROL Unit) Permanent DTC	No DTC was found	
ACM Permanent DTC	No DTC was found	
FCW LDW Permanent DTC	U0416-68	(VSA Brake Actuator Malfunction)
BODY ELECTRICAL Permanent DTC	B12D3	Power Control Unit IG Latch Circuit Error

Date _____ 4/29/2026

Dealer Number _____ 206671

Service Shop _____

Service Manager Signature _____

DataList

SRS

Filename : Current Data
Date/Time : 29/04/2026 06:18AM
Model : ODYSSEY
VIN : XXXXXXXXXX
Dealer No. : 206671

Model Year : 2017
Odo : 112056
XXXXXXXXXX

ECU Maker	DENSO
Left Front Seat Belt Buckle	Unbuckled
Right Front Seat Belt Buckle	Unbuckled
Driver Seat Position Sensor	NOT-NEAR
Number of Front Passenger's Seat Weight Sensor	-
Left Front Airbag, Left Front/Rear Seat Belt Tensioner and/or Left Knee Airbag Deployed	ON
Right Front Airbag, Right Front/Rear Seat Belt Tensioner and/or Right Knee Airbag Deployed	ON
Left Side Airbag, Left Side Curtain Airbag, and/or Left Front/Rear Seat Belt Tensioner Deployed	OFF
Right Side Airbag, Right Side Curtain Airbag, and/or Right Front/Rear Seat Belt Tensioner Deployed	OFF
Side Curtain Airbag and/or Seat Belt Tensioner Deployed	OFF









NHTSA Exec Secretariat

Control Number:	NHTSA-260612-001	Action Office:	NHTSA
Document Date:	5/30/2026	Due Date:	10/12/2026
Correspondent:	Nathaniel W. Bowe		
Subject:	Petition for Defect Investigation Under 49 CFR Part 552 - Honda Odyssey 2011-2017		
Action:	For Direct Reply		

Comments:

Date	Action
6/12/2026	Folder Assigned to (NEF) NHTSA NEF Enforcement by Cynthia Davis Comments: Please assign to Randy Reid.
6/12/2026	NHTSA-260612-001_-_Incoming_-_NHTSA-260612-001 Incoming.pdf uploaded to the folder Incoming by Cynthia Davis
6/12/2026	Folder created on 6/12/2026 8:43 AM by Cynthia Davis