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DEPARTMENT OF TRANSPORTATION

National Highway Traffic Safety Administration

[Docket No. NHTSA-2026-2146]

Denial of Motor Vehicle Defect Petition, DP26-005

AGENCY: National Highway Traffic Safety Administration (NHTSA), Department of Transportation

ACTION: Denial of a petition to open a defect investigation

SUMMARY: This notice sets forth the reasons for the denial of a petition, DP26-005, submitted by Mr. Nathaniel W. Bowe III (Petitioner) to the Administrator of NHTSA (Agency) by a letter dated May 30, 2026, under 49 U.S.C. § 30162 and 49 CFR part 552. The Petition requests that the Agency initiate a safety defect investigation into allegations of inadvertent airbag deployments in certain Model Year (MY) 2011 to 2017 Honda Odyssey vehicles (the Subject Vehicles). The Petition alleges that these inadvertent deployments may injure vehicle occupants or distract the driver and cause a collision. The Petition further alleges that the Diagnostic Trouble Codes (DTCs) and Supplemental Restraint System (SRS) status are in conflict and inaccurate data is being recorded for the airbag system.

NHTSA's Office of Defects Investigation (ODI) has determined that the issues raised in the Petition are not likely to result in a finding that a defect related to motor vehicle safety exists. This determination is based on ODI's technical review of available information, which included: (1) consumer complaints submitted by the Petitioner; (2) consumer complaint information in the Agency's databases; and (3) other relevant information in possession of the Agency. As a result,

further investigation of the issue raised by the Petition is not warranted, and the Agency, accordingly, has denied the Petition.

FOR FURTHER INFORMATION CONTACT: Mr. Sean A. Hays, Vehicle Defect Division A, Office of Defects Investigation, NHTSA, 1200 New Jersey Avenue, S.E., Washington, D.C. 20590. Telephone: 202-366-9318. E-mail: sean.a.hays@dot.gov

SUPPLEMENTARY INFORMATION:

1. INTRODUCTION:

Any interested person may petition NHTSA to request that the Agency initiate an investigation to determine whether a motor vehicle or item of replacement equipment complies with an applicable motor vehicle safety standard or contains a defect that relates to motor vehicle safety. 49 U.S.C. § 30162(a)(2); 49 CFR 552.3. Upon receipt of a properly filed petition, the Agency conducts a technical review of the petition, material submitted with the petition, and any additional information. 49 CFR 552.6. The technical review may consist solely of a review of information already in the possession of the Agency or it may include the collection of information from the motor vehicle manufacturer or other sources. *Id.* The Agency will grant or deny the petition after conducting a technical review and considering appropriate factors. These factors may include the nature of the complaint, allocation of agency resources, agency priorities, the likelihood of uncovering sufficient evidence to establish the existence of a defect, and the likelihood of success in any necessary enforcement litigation. *See* 49 U.S.C. § 30162(a)(2); 49 CFR 552.8.

2. DEFECT PETITION SUMMARY

In a letter dated May 30, 2026, the Petition requested that NHTSA “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.” The Petition supported this request by citing multiple online complaints in various user forums as well as 10 consumer complaints found on NHTSA’s website.

The Petition states that a systemic electronic, software, or mechanical defect causes critical safety systems to trigger without an appropriate environmental stimulus, such as physical impact, a rollover event, or G-force threshold breach. The Petition states that 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. NHTSA has based its decision on a review of the material cited by the Petition, pertinent information in NHTSA’s databases, and other relevant information in possession of the Agency.

3. OFFICE OF DEFECTS INVESTIGATION ANALYSIS

An air bag is a supplemental vehicle occupant restraint system that deploys a cushion designed to inflate in milliseconds during a collision. The cushion prevents vehicle occupants from striking hard interior surfaces and, in some cases, exterior surfaces. Air bags are designed to work in conjunction with seat belts, the primary occupant restraint system. Seat belts restrain occupants keeping them in place for the air bag to provide proper protection and to mitigate injury from air bag deployment.

An airbag system consists of an airbag cushion, an inflator module, an airbag Electronic Control Unit (ECU), and impact sensors. When a crash begins, impact sensors located on the vehicle exterior begin to measure impact severity. If a crash is severe enough, the sensors send a signal to the system’s ECU, which then signals the inflator to fill the air bag.

Frontal air bags for both the driver and front passenger have been required under Federal Motor Vehicle Safety Standard (FMVSS) No. 208 (Occupant Crash Protection) since MY 1999 in all light passenger vehicles. Side air bags (both curtain and thorax) are not specifically required by an FMVSS but are offered as standard equipment in most new light passenger vehicles in order to comply with FMVSS No. 214 (Side Impact Protection) and No. 226 (Ejection Mitigation).

ODI reviewed 9 Vehicle Owner Questionnaires (VOQs), one Early Warning Reporting (EWR) Death & Injury (D&I) report, and several TREAD (Transportation Recall Enhancement, Accountability, and Documentation) Field Reports alleging inadvertent airbag deployment in the Subject Vehicles. Multiple VOQs and the D&I report mention inadvertent deployment: 3 VOQs alleged inadvertent deployment of frontal air bags, 6 VOQs and the D&I report alleged inadvertent deployment of side curtain air bags, and 4 VOQs and the D&I report alleged inadvertent deployment of side thoracic air bags. Several complaints allege that the inadvertent deployment of airbags occurred while traveling over potholes, road debris, or during minor curb strikes. All complaints allege that there was no warning prior to the inadvertent deployment.

In general, different types of air bags are designed for different types of impacts. For instance, frontal air bags are generally designed to deploy during frontal impacts; side curtain air bags are generally designed to deploy both during rollovers and impacts to the sides of the vehicle; and side thorax air bags are generally designed to deploy during impacts to the sides of the vehicle. While these are broad categories of crash scenarios, the specific conditions under which deployment is intended are multifaceted and dependent on complex algorithms. Differences in particular variables can make a deployment an intended part of the design in one scenario and not in another similar scenario.

Although the reports described above all contain allegations of inadvertent deployment, the conditions under which those reported deployments occurred differ widely. The reports ranged across different types of airbags, different combinations of airbags, and different driving scenarios preceding the deployment. Based on the data available to ODI, there is no clear pattern or factor to prompt the alleged inadvertent deployments. Thus, ODI's review did not identify a trend of a vehicle defect regarding any type of airbag in the Subject Vehicles. Moreover, ODI did not identify any reports of inadvertent air bag deployment that resulted in a loss of vehicle control. ODI is likewise not aware of any crashes or severe injuries involving the Subject Vehicles that resulted from inadvertent deployment of the air bags.

ODI recognizes that inadvertent air bag deployments can create dangerous safety hazards. For instance, an inadvertent deployment can surprise a driver, leading to a loss of vehicle control; or if an inadvertent deployment occurs when an occupant is out of position, the force of the deployment may injure the occupant. Inadvertent deployments have been the basis for past NHTSA recalls and investigations. Here, the Petition cites one such recall: Recall 26V-227, which concerns inadvertent deployment of the side curtain and thoracic air bags in MY 2018 to 2022 Honda Odyssey vehicles (the "Recalled Vehicles") due to the air bag ECU containing incorrect deployment parameters. Although this recall involved Honda Odyssey vehicles in adjacent model years to the Odyssey vehicles that are the subject of this Petition, ODI understands certain key differences to exist between the two groups of Odyssey models. Honda introduced a new generation of the Odyssey line in 2018. This new generation involved a large-scale redesign and a new vehicle platform compared to the previous model years. As a result, the vehicles covered by the Petition differ from the recalled vehicles in many characteristics, including physical dimensions, engines, transmissions, and airbag ECU algorithms. Given these

differences, ODI's review has not identified evidence that the reports of inadvertent deployment in the Odyssey models covered by the Petition correlate to Recall 26V-227.

The Agency has thoroughly assessed the material submitted by the Petition, consumer complaint information in NHTSA's databases, and other relevant information already in possession of the Agency. Based on this review, NHTSA does not believe that the issues presented by the Petition indicate the likelihood of a safety-related defect that would warrant a formal investigation. After full consideration of the available information, the Petition is denied.

Authority: 49 U.S.C. 30162(d) and 49 CFR Part 552; delegation of authority at 49 CFR 1.95(a).¹

Eileen Sullivan

Associate Administrator for Enforcement.

¹ The authority to determine whether to approve or deny defect petitions under 49 U.S.C. § 30162(d) and 49 CFR Part 552 has been further delegated to the Associate Administrator for Enforcement.