HYUNDAI AMERICA TECHNICAL CENTER, INC.

A Subsidiary of Hyundai Motor Company (Korea)

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August 6, 2004

Mr. George Person, Chief Recall Management Division National Highway Traffic Safety Administration 400 Seventh Street, S.W. Room 5319 NVS-215 Washington, DC 20590

Re:

NHTSA Recall Campaign No. 04V305000

Amendment to 49 Code of Federal Regulations, Part 573, Defect Notification

Dear Mr. Person:

This letter is submitted in reference to NHTSA's Recall Campaign Identification Number 04V305000. For reasons discussed herein Kia Motors America, Inc. (KMA) and Kia Motors Corp. (KMC) are amending the defect notification letter submitted by this office on June 21, 2004, to remove 2000 model year Kia Spectra vehicles from the scope of vehicles being recalled under this campaign. Kia requests NHTSA to accept this amendment and revise its public recall database files accordingly.

Campaign number 04V305000 was commenced to remedy a defect condition identified in a limited percentage of 1999 through 2000 model year Kia vehicles equipped with A97 type front seatbelt buckles manufactured by Duck Boo International Co., Ltd. At the time that notice of this campaign was given to your office, KMA mistakenly believed that the A97 buckle had been installed in 2000 model year Kia Spectra vehicles, and therefore included these vehicles within the recall population as described in the original defect notification letter. KMA has since found that the front seatbelt buckles installed in 2000 model year Spectra vehicles were manufactured by Autoliv Australia, Inc., and has determined that there is no need to recall these vehicles for the A97 buckle recall condition. Consequently an amendment to the June 21 defect notification letter is necessary.

The Autoliv buckle installed in 2000 model year Spectra vehicles, in addition to having been manufactured by a company different from the manufacturer of the A97 buckle, is based on a distinctly different design. The differences between the Autoliv buckle and A97 buckle are discussed in some detail by Kia in its correspondence with Mr. Thomas Z. Cooper in the Office of Defects Investigation responding to ODI's investigation of front seat belt buckles used in 1999 through 2002 Sportage and Sephia vehicles. Specifically, please see the letter from this office to Mr. Cooper dated February 9, 2004, and appendices 1C through 1F thereto. For your information, ODI's designation for that investigation was

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RQ03-007.

Thereafter, on February 27, 2004, ODI closed RQ03-007 and opened an Engineering Analysis (designated EA04-007). <u>Importantly for purposes of this amendment</u>, the subject of EA04-007 was limited to the A97 buckle and ODI discontinued any further investigation related to the Autoliv buckle.

As stated at the outset of this letter, KMA has now verified that all 11,042 Kia 2000 Spectra models previously reported to have been equipped with A97 buckles were actually equipped with Autoliv buckles. Kia has determined that there is no safety defect affecting the Autoliv buckle. It is therefore withdrawing these vehicles from the subject recall and is amending Sections (c)(2) and (c)(3) of the 49 C.F.R. Part 573 defect notification letter dated June 21, 2004, as follows:

573,6 (c)(2)

Identification of Vehicle, Make, Model Year and Manufacturing Date: 1999-2000 model year Kia vehicles equipped with A97 Type front seat belt buckles manufactured by Duck Boo International Co., Ltd. Specifically:

- Model year 1999–2000 Kla Sephia vehicles produced from 6/1/98 – 7/31/00.
- Model year 1999–2000 Kia Sportage vehicles produced from 3/1/98 – 11/30/00.

573.6 (c)(3) Total Number of Vehicles: The total number of vehicles identified in 573.6(c)(2) is approximately 251,594.

Kia requests NHTSA to accept this amendment and revise the Information in its public recall database files accordingly. If you or your staff have questions or comments regarding this matter, please contact the undersigned.

Very truly yours,

Alfred E. Gloddeck

Senior Manager - Corporate Affairs

Street E. Closedeck

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cc: Mr. Kenneth N. Weinstein
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Mr. Thomas Z. Cooper Vehicle Integrity Division Office of Defects Investigation National Highway Traffic Safety Administration 400 Seventh Street, S.W. Washington, D.C. 20590