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OFFICE OF
DEFECTS INVESTIGATION

October 6, 2005

05V-466
(4 pages)

Mr. Ronald Medford
Senior Associate Administrator
National Highway Traffic Safety Administration
400 Seventh Street, SW
Washington D.C. 20590

Subject: MY 2002-2004 Isuzu Rodeo, Rodeo Sport, Axiom and Honda Passport –
Fuel Pump –
Part 573 Report

Dear Mr. Medford:

On behalf of Isuzu Motors Limited, Japan ("Isuzu Motors"), Isuzu Manufacturing Services of America, Inc. (collectively, "Isuzu") hereby submits this report pursuant to 49 CFR part 573 as it applies to a determination by Isuzu to conduct a safety recall of certain 2002, 2003 and 2004 model year SUVs.

573.6 (c)(1):

Isuzu Motors Limited is the manufacturer of the subject vehicles, Isuzu Motors America, Inc. is the distributor of the Isuzu-badged subject vehicles and American Honda Motor Co., Inc. is the distributor of the subject Honda Passport vehicles.

573.6 (c)(2):

Certain vehicles identified on Attachment 1 that are registered in Texas, Oklahoma, Arkansas, New Mexico and Louisiana.

573.6 (c)(3):

The total number of vehicles potentially affected will be forwarded to NHTSA in the near future.

573.6 (c)(4):

It is unknown how many vehicles may have been operated over a sustained period of time with fuel contaminated by silicon. As a result, it is Isuzu's intention to offer a remedy to all potentially affected vehicles that are registered in the five states identified in item 2, above.

573.6 (c)(5):

Summary: Pin holes may be created on the fuel pump feed port in the subject vehicles, which were caused by electrostatic discharge, which, in turn, was likely caused by long-term exposure to fuel with a high silicon content. As a result, the customer may notice a fuel odor and, in the worst case, a fuel leak may occur.

Detailed description: Isuzu has become aware of 34 fuel pumps installed in vehicles identified on attachment 1 that have small pin holes in the fuel pump feed port. Of these 34 fuel pumps, 31 were located in Texas, and 25 were located in the vicinity of Tyler, Texas. Isuzu analyzed the fuel contained in certain vehicles from the Tyler area, and also surveyed motor vehicle fuel offered for sale in the Tyler, Texas area. Based on this research, Isuzu determined that the fuel from those subject vehicles and from some service stations in the Tyler, Texas area contained high amounts of the contaminant, silicon. Specifically, fuel from retail establishments surveyed in the Tyler, Texas area was found to contain between 1000 and 2000 parts per billion of silicon. Fuel taken from the sample vehicles from the Tyler, Texas area was found to contain silicon in the range of 1000 and 7000 parts per billion of silicon. By contrast, fuel surveyed from outside the Tyler, Texas region was found to have no more than 167 parts per billion of silicon, and usually much less. Silicon is known to be capable of damaging internal vehicle components, and is not an EPA-approved additive for fuel. Isuzu has concluded that the damage to the fuel pump feed port manifested by the observed pin holes in the subject vehicles was caused by electrostatic discharge, which, in turn, was likely caused by long-term exposure to fuel with a high silicon content. Isuzu has not concluded that the development of pin holes in the fuel pump feed port is a consequence of any defect in its vehicles; rather, Isuzu has concluded that the development of the pin holes is probably traceable to the unforeseen and unreasonable presence of silicon in fuel used by those vehicles. Nevertheless, Isuzu is willing to address the issue as if it were a safety defect in the vehicle, for purposes of notifying owners of subject vehicles within the five states identified in item 2, above.

573.6 (c)(6):

In March 2004, upon noticing that five fuel pumps had been replaced in a short period of time by one dealer in Tyler, Texas because of customer complaints of a fuel odor, Isuzu commenced an investigation. The parts in question were found to have pin holes. With the help of its fuel pump vendor (Delphi), Isuzu tentatively concluded in June 2004 that the pin holes were being caused by electrostatic discharge (ESD). In February 2005, Isuzu became confident that ESD is the cause of the pin holes but was still uncertain as to the cause of the ESD and the reason for the geographical concentration. Between March 2004 and September 2005, Isuzu considered various possible causes of ESD including fuel and local weather. Isuzu commissioned a fuel analysis, which took place between September 2004 and September 2005. During the period between March 2004 and August 2005, Isuzu Japan analyzed a large number of fuel pumps that were randomly collected throughout the U.S. and found 34 with pin holes, 31 of which are from Texas vehicles (25 from the suburbs of Tyler, Texas). In August 2005, after finding high silicon content in Tyler, Texas fuel and the existence of fuel pumps with pin holes extremely concentrated in Tyler, Texas, Isuzu concluded that high silicon content in Tyler, Texas fuel is the cause of the pin holes. In September 2005, Isuzu discussed the possibility of a regional recall campaign with NHTSA staff by telephone. Based on the above, Isuzu made the decision to file this report and to address this issue as if it were a safety defect in the vehicles, notwithstanding Isuzu's determination that the development of the pin holes is not caused by a defect in the subject vehicles or their fuel pumps.

573.6 (c)(8):

Isuzu will provide written notification to each owner of a potentially affected vehicle identified in item 2, above, offering to provide a new cover over the existing feed port on the fuel pump, which will be made of a different material that is conductive. For vehicles in which evidence of actual or developing pin holes is identified, Isuzu will offer to provide a new fuel pump which will also have a feed port cover that is conductive. The repairs will be provided free of charge. Isuzu has concluded that the use of a conductive material in the new cover will likely eliminate the risk of the subject vehicles' being prone to failure as a result of contact with silicon-contaminated fuel. Isuzu presently plans to begin notification of owners of the affected vehicles identified in item 2, above, that are within the five identified states in or about late October 2005. Isuzu does not believe that any individual is entitled to reimbursement, because all repairs of affected vehicles for the condition described in this Report were performed under warranty (free of charge). Accordingly, and consistent with NHTSA's reimbursement regulations, Isuzu does not plan to address reimbursement in the owner notification letter.

573.6 (c)(9) and (10):

Copies of a draft campaign service bulletin and a draft owner letter will be forwarded to NHTSA in the near future.

If you have any questions or require additional information, please contact me at 734-582-9262 or Christine Ueno of my staff at 734-582-9260.

Sincerely,

A handwritten signature in black ink, appearing to read 'Jeffery A. Marsee', with a long horizontal flourish extending to the right.

Jeffery A. Marsee
Chief Representative
Emission and Safety
Isuzu Manufacturing Services of America, Inc.

Attachments

Attachment 1
573.6 (c)(2) and (3):

Vehicles Potentially Affected by Make, Model and Model Year plus Inclusive Dates of Manufacture.

MAKE	MODEL SERIES	MODEL YEAR	NUMBER INVOLVED	INCLUSIVE MANUFACTURING DATES	
				FROM	TO
Isuzu	Rodeo	2002 – 2004 MY	TBD	July 2001	June 2004
	Rodeo Sport	2002 – 2003 MY	TBD	July 2001	April 2003
	Axiom	2002 – 2004 MY	TBD	November 2001	June 2004
Honda	Passport	2002 MY	TBD	July 2001	January 2002
		TOTAL	TBD		