



Hyundai-Kia America Technical Center, Inc.

12610 East End Ave., Chino, CA 91710

Tel. 909-627-3525 Fax 909-628-7682



KIA MOTORS

December 9, 2005

05V-557
(4 pages)

VIA FEDERAL EXPRESS

Daniel Smith
Associate Administrator for Enforcement
National Highway Traffic Safety Administration
400 Seventh Street, S.W.
Washington, D.C. 20590

Re: Recall Campaign
2003-2005 MY Kia Rio Child Seat Anchorage System; FMVSS 225
Noncompliance

RECEIVED
NHTSA
2005 DEC 12 P 3:11
OFFICE OF INVESTIGATION
909-215

Dear Associate Administrator Smith:

The following information is submitted in accordance with Part 573 of Title 49 of the Code of Federal Regulations.

573.6(C)(1)

Manufacturer:	Kia Motors Corp.
Importer:	Kia Motors America, Inc.
Agent Designated by Manufacturer:	Alfred E. Gloddeck Hyundai-Kia America Technical Center, Inc.

573.6(C)(2)

Identification of Vehicle, Make, Model Year and Manufacturing Date:	All model year 2003 and 2004 Kia Rio vehicles and model year 2005 Kia Rio vehicles produced through June 11, 2005, except for the Kia Rio Cinco model (5-door hatchback).
---	---

573.6(C)(3)

Total Number of Vehicles	Approximately 90,865 Kia Rio vehicles are in the production range specified in (c)(2). These include the following approximate numbers of vehicles by model year: 2003MY = 35,358; 2004MY = 31,952; 2005 MY = 23,555.
--------------------------	---

573.6(C)(4)

Percentage of Vehicles Estimated to Actually Contain the Noncompliance:	The noncompliance may exist in all vehicles identified in (C)(3).
---	---

573.6(C)(5)

Description of the Noncompliance:

When the anchors of the Child Restraint Fixture (CRF) specified by FMVSS 225 slide onto the child lower anchors in the vehicle, the nose of the CRF anchors contact a metal wire in the rear seat back frame. This interference prevents the forward most portion of the anchor slot from contacting the child lower anchors. As a result, certain child seats manufactured pursuant to FMVSS 213 may not latch onto the child lower anchor.

573.6(C)(7)

Basis for Noncompliance
Determination

Kia has received no indication that any problems are being encountered in the existing fleet of Rio vehicles. No complaints have been made to Kia's Customer Assistance Department, and no Field Reports have been written about any such problem. In addition, no warranty claims have been made regarding such a problem.

However, on October 25, 2005, HKATCI notified Kia that NHTSA's Office of Vehicle Safety Compliance had reported a Laboratory Test Failure by General Testing Laboratories, Inc., identifying that the Child Restraint Fixture (CRF) and Static Force Application Device (SFAD 2) "will not hook onto lower restraint anchors". This was asserted to be due to incorrect dimensions of the lower anchors.

At Kia's direction, HKATCI arranged for MGA-Detroit to conduct FMVSS 225 testing of a 2005 Model Year Rio on November 7, 2005. This testing failed to confirm any improper dimensioning of the anchors. However, MGA identified that there was interference between a portion of the metal wire frame in the seatback and the CRF. That is, the CRF anchors slid onto the child lower anchors, but observation showed that it was not in contact with the forward portion of the CRF anchor slot.

KMC then reviewed its prior testing which had supported compliance with FMVSS 225. The

original testing was conducted prior to the 2003MY with a CRF and no interference was identified. Additional testing was conducted by KMC in November 2004, during which an exemplar child seat fully locked to the rear seat child lower anchors.

KMC's further analysis and communications with its suppliers since the MGA testing has led it to conclude that there was an unidentified change in the wire frame for the Rio seatback after the initial CRF testing was conducted in 2002, and that this resulted in the described interference. This interference was not discovered in subsequent testing with an exemplar child seat, and latching occurred with the exemplar seat. Subsequent analysis has determined that while this child seat was manufactured pursuant to ISO standards, it did not replicate CRF dimensions.

Further work and analysis during November 2005 has led Kia to conclude that all vehicles in the production range specified in (c)(2) are non-compliant with FMVSS 225, although evaluations of exemplar child seats indicate that they will typically latch on to the child lower anchors.

573.6(C)(8)(i)

Program to Remedy
Noncompliance:

All owners of vehicles identified in (C)(3) will be notified by first class mail to bring their vehicle to a Kia dealer. At that time, the child lower anchors located between the rear seat backs and seat cushions will be replaced.

573.6(C)(8)(ii)

Estimated Date for Notification of
Noncompliance to Owners and
Dealers

The estimated date of notification to dealers is December 23, 2005. The estimated date of notification to owners is the end of January 2006.

573.6(C)(11)

Notices

A draft of the owner notification letter will be submitted contemporaneously with this notice. A Technical Service Bulletin will be provided to NHTSA in the near future.

573.6(C)(12)

Manufacturer's Campaign Number SC057
If Different From Identification
Number Assigned by NHTSA

If you or your staff have questions or comments regarding this matter, please contact me in writing at the above address.

Very truly yours,



Alfred E. Gloddeck
Senior Manager—Regulation &
Certification Department