HONDA

American Honda Motor Co., Inc.
1919 Torrance Boulevard
Torrance, CA 90501-2746
Phone (310) 783-2000

February 26, 2010

Mr. Daniel C. Smith
Associate Administrator for Enforcement
NATIONAL HIGHWAY TRAFFIC SAFETY
ADMINISTRATION
Attn: Recall Management Division (NVS-215)
1200 New Jersey Avenue, SE
Washington, DC 20590

Dear Mr. Smith:

Pursuant to conversations with Mr. Michael Lee of the NHTSA Office of Defect Investigation today, we have agreed to make certain changes to our letter of intent and customer letter regarding campaign 10V-055. This document supersedes our letter of February 18, 2010 for this matter.

Since NHTSA opened EA08-015 in August of 2008 Honda and members of your staff have been reviewing the performance of gas-filled liftgate struts on certain 2005 Honda Odyssey vehicles equipped with power liftgate systems. As Honda has reported to NHTSA, the liftgate struts on some of these vehicles may be prone to failure within an earlier than normal time frame. Through the course of these discussions, your staff and Honda have been unable to reach agreement on certain aspects of this matter, however Honda recognizes the inconvenience this can pose for our customers.

Though Honda does not agree with NHTSA that this constitutes a safety defect, Honda has decided to conduct a campaign to replace those struts that may fail prematurely and have not already been replaced under warranty, and to repay consumers who have replaced failed struts at their own expense. At this time we believe that most of the struts that have been replaced to date were replaced with struts of a subsequent design that are not expected to be subject to the same unexpected high rate of early life failure.

As agreed with your staff, this product update campaign is not being conducted under the Safety Act. We are submitting this letter in a format consistent with the requirements of Part 573 for the sake of simplified communication.

(1)

Name of manufacturer: Honda Manufacturing of Alabama LLC (HMA)

Manufacturer's agent: Jay Joseph
American Honda Motor Co., Inc. (AHM)
1919 Torrance Blvd.
Torrance, CA 90501-2746

(2)

Identification of potentially affected vehicles:

Make/Model	Description	VIN Range/Dates of Manufacture
Honda Odyssey Touring model	Certain 2005 model year	5FNRL38865B000152 - 5FNRL38845B127045 June 22, 2004 – July 15, 2005

Description of the basis for the determination of the product update population:
The campaign population was based on manufacturing records and market occurrence of the involved symptom. The VIN range reflects all possible vehicles that could potentially experience the problem.

(3)

Total number of potentially affected vehicles: 21,776

(4)

Percentage of affected vehicles that contain the problem: Unknown

(5)

Problem description:

The gas-filled struts that help to raise and support the liftgate of vehicles equipped with a power liftgate system may be prone to early life failures due to a manufacturing flaw at the supplier. If this flaw is present, it can result in a pressurized gas leak and reduce strut performance. Struts with diminished performance will result in the liftgate closing under its own power, possibly unexpectedly, with potential risk of injury and inconvenience to users.

(6)

Chronology:

April 10, 2008	Honda received opening resume for PE08-026 and cooperated with NHTSA's inquiry.
August 8, 2008	Honda received EA08-015 notification and cooperated with NHTSA's continued analysis efforts.
January, 2010	Honda met with NHTSA staff and subsequently agreed to conduct a product update campaign

(7)

Quarterly Reports:
Honda will submit six consecutive quarterly reports in accordance with the requirements of 49 CFR Part 573.7

(8)(i)

Program for remedying the problem:
The owners of all affected vehicles will be contacted by mail and asked to take their vehicle to a Honda automobile dealer. The dealer will inspect the lot number of the gas struts. If lot number indicates that the struts are within the range of affected components they will be replaced at no charge to the consumer.

(8)(ii)

The estimated date to e-mail preliminary notification to dealers:	March, 2010
The estimated date to provide service bulletin to dealers:	March, 2010
The estimated date to begin sending notifications to owners:	March, 2010
The estimated date of completion of the notification:	March, 2010

(9)

Representative copies of all notices, bulletins and other communications:
A copy of the dealer service bulletin and text of the final customer notification letter will be submitted to your office as soon as possible.

(10)

Proposed owner notification letter submission:
A draft of the owner notification letter will be submitted to your office as soon as possible.

(11)

Manufacturer's campaign number:
R29

Sincerely,

AMERICAN HONDA MOTOR CO., INC.

Jay Joseph
Senior Manager
Product Regulatory Office

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