

**Hyundai-Kia America Technical Center, Inc**

11V-473  
(3 Pages)

**Voluntary 573.6 Report 2007 – 2008 Kia Sorento OCS**

Pursuant to Part 573 of Title 49 of the Code of Federal Regulations, Hyundai-Kia America Technical Center, Inc. submits the following information:

**573.6 (C)(1)**

Manufacturer:	Kia Motors Corp.
Importer:	Kia Motors America, Inc.
Agent Designated by Manufacturer:	Robert Babcock Hyundai-Kia America Technical Center, Inc

**573.6(C)(2)**

Identification of Vehicle, Make, Model Year and Manufacturing Date:	Approximately 57,344 2007-2008 MY Kia Sorento vehicles were produced from 06/15/06 through 11/27/07 and subject to the May 2009 Service Campaign SC076. Vehicles which have not had Service Campaign SC076 completed are subject to the recall.
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**573.6(C)(3)**

Total Number of Vehicles	Approximately 10,631 vehicles which have not had SC076 completed since May 2009.
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**573.6(C)(4)**

Percentage of Vehicles:	Unknown. NHTSA's definition of defect is based on totaling complaints, and whether any of the subject vehicles is operated by a person who will complain is impossible to determine. Kia's testing has shown a robust functioning of the OCS with a wide range of body sizes and seating positions.
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**573.6(C)(5)**

Description :	All of the vehicles identified in (c)(3) have Occupant Classification Systems (OCS) for the front passenger seat which perform in compliance with FMVSS 208. After evaluation by Kia and its suppliers of Sorento vehicles which have not had SC076 completed, Kia has determined that passengers who sit in accordance with the Owner's Manual instructions and in a wide range of other real world positions are properly classified. NHTSA has totaled classification complaints for 2007 – 2008 Sorento vehicles manufactured prior to 11/27/07, stated that they were higher than certain other vehicle models and that this constitutes a defect.
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**573.6(C)(6)**

## Hyundai-Kia America Technical Center, Inc

### Basis for Determination:

In March – June 2007, Kia with its suppliers conducted a field evaluation of 2007 Sorento vehicles which identified that customers who sat in accordance with the Owner Manual's instructions were properly classified. A product upgrade on July 25, 2007 took advantage of a delay of a regulatory requirement made after the start of production for the 2007 Sorento to change the OCS logic and ameliorate classification issues created by that regulation. In late July to early August 2007, further testing was conducted by Kia and its suppliers to gather more data. In September 2007, NHTSA changed FMVSS 208 to eliminate compliance with a regulatory section and Kia commensurately changed the OCS logic on 11/27/07.

In January 2008, Kia made the 11/27/07 logic upgrade available for earlier 2007 – 2008 Sorento vehicles. On May 12, 2009, Kia commenced Service Campaign SC076 to advise customers of the availability of the 11/27/07 upgrade at no charge to the customer. On July 17, 2009, NHTSA started PE09-034. Kia and its suppliers re-evaluated the OCS and found that properly seated passengers are correctly classified, and provided responses to NHTSA on September 25, 2009 and October 21, 2009. On November 19, 2009, NHTSA upgraded the matter to EA19-017. Kia and its suppliers did a further investigation and reached the same conclusion and provided responses to NHTSA on May 19 and June 25, 2010.

In early August 2011, Kia conducted testing of a 2008 Sorento which had not had SC076 completed and found that the OCS properly classified 12 varying subjects in 72 real world seating positions 100% of the time. Later in August 2011, NHTSA advised Kia that pursuant to a calculated complaint rate, it was planning to request that Kia conduct a recall of those 2007 – 2008 Kia Sorento vehicles which had not had the 11/27/07 logic upgrade since May 2009, the time the upgrade was made available pursuant to SC076. In order to avoid a protracted dispute with NHTSA, on August 31, 2011 Kia decided to provide a 573 notice to NHTSA, and to conduct a third customer mailing, this time with reference to 573.

### 573.6(C)(8)(i)

#### Program:

All owners of vehicles identified in (C)(3) will be re-notified by first class mail to and instructed to contact their Kia dealer to have the SC076 logic upgrade performed.

### 573.6(C)(8)(ii)

#### Estimated Date for Notification to Owners and Dealers

The estimated date of notification to dealers is mid September 2011. The estimated date of notification to owners is late

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September 2011.

**573.6(C)(11)**

Notices

A draft of the owner notification letter is attached. A Technical Service Bulletin will be provided to NHTSA in the near future.

**573.6(C)(12)**

Manufacturer's Campaign Number SC076A  
If Different From Identification  
Number Assigned by NHTSA