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12V-245
(5 Pages)

HYUNDAI-KIA
AMERICA TECHNICAL CENTER, INC.

May 29, 2012

Ms. Nancy Lewis
Associate Administrator for Enforcement
National Highway Traffic Safety Administration
Attn: Recall Management Division (NVS-215)
1200 New Jersey Avenue, SE,
Washington, DC 20590

VIA FEDERAL EXPRESS

Re: Voluntary Safety Recall Campaign
2009MY Kia Borrego Brake Pedal Mount Replacement

Dear Ms. Lewis:

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

Sincerely,

Robert Babcock

Robert Babcock
Director, Certification and Compliance Affairs

Hyundai-Kia America Technical Center Inc.
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VOLUNATARY 573.6 REPORT 2009 KIA BORREGO

573.6 (C)(1)

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

573.6(C)(2)

Identification of Vehicle, Make, Model Year and Manufacturing Date:	2009 Model Year Kia Borrego vehicles produced from May 2, 2008 through January 20, 2009 with non-adjustable brake pedals.
Recall Population Determination:	The 2009 Borrego vehicles with adjustable brake pedals do not contain the condition described in (C)(5). The recall population was identified based on manufacturing records identifying those vehicles with non-adjustable brake pedals. The supplier of the brake pedal was changed on July 13, 2009. No vehicles were produced for U.S. sales from January 21, 2009 to July 13, 2009.
Identification of Component Manufacturer	SL Corporation 1208-6 Sinsang-ri, Jillyang-eup, Gyeongsan-si, Gyeongbuk, Korea + 82 10 5616 4790

573.6(C)(3)

Total Number of Vehicles	Approximately 21,912 vehicles will be subject to this recall.

573.6(C)(4)

Percentage of Vehicles Estimated to Actually Contain the Defect:	This defect potentially exists in any vehicle identified in (C)(2). The estimated percentage of vehicles to actually contain a defect is very low and may approach zero.

573.6(C)(5)

Description of the Defect:	The high strength plastic mount for the brake pedal is designed to break off in certain collisions to help protect the driver's leg from injury when the brake is being applied during impact. Certain pedal mounts may have a fiberglass composition that allows them to break off in a collision where the impact has not immobilized the vehicle, which could then roll. The driver would then be required to stop the vehicle with the parking brake or experience a possible second impact, which could result in personal injury.

573.6(C)(6)

Basis for Defect Determination:	See attached chronology.

573.6(C)(8)(i)

Program to Remedy Defect:	All owners of vehicles identified in (C)(3) will be notified by first class mail with instructions to contact their Kia dealer to schedule an appointment. Kia will replace the brake pedal mount at no charge and will reimbursement owners for repair expenses already incurred pursuant to Kia's General Reimbursement Plan filed April 30,2012.

573.6(C)(8)(ii)

Estimated Date for Notification of Defect to Owners and Dealers	The estimated date of notification to dealers is sometime in June 2012. The estimated date of notification to owners is sometime in June 2012.

573.6(C)(10)

Notices	A draft of the owner notification letter is attached. The Technical Service Bulletin SC096 will be provided to NHTSA in the near future.

573.6(C)(11)

Manufacturer's Campaign Number If Different From Identification Number Assigned by NHTSA	SC096

Chronology re Basis of Defect Determination 573.6(c)(6)

10/21/09	**KMA received report of vehicle with broken brake pedal mount. Impact occurred. Search of KMA records identifies 10/07/2009 CA report of broken brake pedal mount with impact.**
10/22/09	**KMC initiates complete pedal evaluation plan.**
10/21 – 10/29/09	**KMC and KMA conduct field mounting bolt torque evaluation and KMC conducts engineering evaluation.**
10/30/09	**KMA reports on results of port inspection of 15 vehicles for fractures and testing to induce overload fractures. All results negative.**
10/30/09	**Mounting bolt torque found below spec on certain field pedals; cause determined to be usage and heat effects. However, testing establishes there is no connection between reduced torque and pedal mount breakage.**
10/21 – 11/3/09	**KMC destructive testing establishes that the force required to break the pedal mount is – consistent with specifications – in excess of 500kgf.**
11/1-11/3/09	**Destruction shape analysis comparing field vehicles and developmental compliance test vehicles show that the breakage pattern is the same, consistent with "breakage inducement shapes" designed into the plastic pedal mount**
11/4/09	**Pedal Lot identified and subjected to material testing by KMC. No deficiency found.**
11/6/09	**KMC Chassis Design Team prepares document for KMA explaining purpose of pedal mount breaking away during impact to help protect driver's leg from injury.**
11/13/09	**Plan established to ensure the recovery for further evaluation of any pedal mounts removed for replacement in the field. Related control on parts orders imposed on KMA parts purchasing system.**
11/1/09 – 2/1/10	**Monitoring period established at KMA to review field data for further reports regarding brake pedal mount breakage. Results at end of monitoring period negative.**
2/2010	**Follow up evaluations between KMA and KMC regarding possible field action; total of 4 reports of pedal mount fracture, all in impact environments. One is KMA field manager advice re dealer who replaced broken brake pedal mount for customer more than a year previously (12/22/08) with no customer complaint.**
Continuous after 2/1/10	**Open ended monitoring of field data established along with permanent parts control regarding brake pedal mount.**
5/7/10	**Pending receipt of further and different field information, KMA orders brake pedal mounts on a cautionary basis for use if it is later determined that a field campaign is needed.**
2/1/10 – 2/1/11	**No field reports of brake pedal mount fractures or field parts orders.**
2/1/11	**Report received from dealer of customer statement of brake pedal mount fracture upon impact. Customer cited for failure to control speed. KMA determined that the broken brake booster confirmed pedal was in use and intact at impact and that the brake pedal functioned as designed.**

2/27/12	**Report received from husband that his wife told him the brake pedal allegedly broke prior to impact in a low speed collision.**
3/30/12	**KMC and KMA agree to conduct full reevaluation of brake pedal mount issue.**
5/2-5/3/12	**KMC and KMA confer on brake pedal mount engineering and history, including evaluation of recent dealer report. Warranty claims-5; field reports-0. Vehicles were in impacts and had broken brake pedal mounts, with some drivers reporting broken brake pedals before impact.**
5/23/12	**KMC decides to conduct safety recall due to remote possibility of brake pedal mount failure occurring in below design impacts.**