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*By Recall Management Division at 3:42 pm, Jul 28, 2014*

July 28, 2014

Ms. Nancy Lewis  
Associate Administrator for Enforcement  
National Highway Traffic Safety Administration  
Recall Management Division (NVS-215)  
1200 New Jersey Avenue, SE – Room W45-306  
Washington, DC 20590

**In RE: 49 CFR 573 Notice**

Dear Ms. Lewis:

On July 21, 2014, Delphi determined that a defect that relates to motor vehicle safety exists in certain items of motor vehicle equipment described below and is furnishing notification to the National Highway Traffic Safety Administration in accordance with 49 CFR 573 Defect and Noncompliance Reports.

Per section 573.6(c), the required information is listed below.

1. Delphi Automotive Systems, LLC is the supplier of the items of motor vehicle equipment described.
2. The parts in question consist of 280 service and aftermarket fuel pump modules that were sold for use in a 2005-2010 Honda Odyssey. The Delphi part number for the suspect fuel pump module is FG1155-11B1.

Delphi's basis for determining the nonconforming fuel pump module population is as follows:

- a. Delphi began selling the Honda Odyssey fuel modules in May 2014.
- b. Delphi contained stock of Honda Odyssey fuel modules on July 10, 2014 after discovery of the nonconformance.
- c. Delphi determined that 280 Honda Odyssey fuel modules had been shipped by Delphi's sub-supplier (JIAXING JOINHANDS) since the start of sale May 2014 through July 10, 2014.

JIAXING JOINHANDS is the manufacturer of the fuel pump modules. JIAXING JOINHANDS's President's address and contact details are listed below:

- Mr. David Cai
- Tel: 0086 13516838888
- Email: [david.cai@jhparts.com](mailto:david.cai@jhparts.com)
- JIAXING JOINHANDS AUTO SPARE PARTS CO. LTD  
NO.858 TANGHUI RD, JIAXING, CHINA.

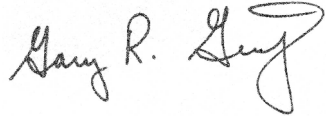
3. Delphi estimates that of the 280 suspect parts sold, potentially 165 suspect fuel pump modules are still in the field.

4. Delphi believes that all of the fuel pump modules remaining in the field have the nonconformance. This is based on the failure mode identified by the sub-supplier JIAXING JOINHANDS.
5. The nonconformance is that the sub-supplier shipped a Honda Civic fuel module in a Honda Odyssey fuel module box. The Honda Civic fuel module has a fuel level calibration that is different than the calibration specified for the Honda Odyssey fuel module. Delphi has determined, via analysis and testing, the following potential field scenarios can result from the installation of the Honda Civic fuel module in a Honda Odyssey vehicle:
  - a. The fuel pump may send an incorrect signal to the fuel gauge, which would cause it to show more fuel in the tank than the correct level, possibly resulting in the vehicle running-out of fuel unexpectedly.
  - b. The fuel gauge will always read  $\frac{3}{4}$  FULL to FULL, regardless of actual fuel level.
6. The chronology of significant events follow:
  - July 7, 2014 – Delphi Product and Service Solutions (DPSS) group was informed of an issue in the aftermarket channel. Request was made by distributor customer to return suspect parts.
  - July 8, 2014 – DPSS engineering team requested resistance specifications of the fuel level sensor of suspect part from sub-supplier site to validate against OE specifications.
  - July 8, 2014 – DPSS team began investigation on all suspect part sales.
  - July 10, 2014 – DPSS team and sub-supplier confirmed that there could be a resistance issue with the fuel level sensor of the suspect part.
  - July 10, 2014 – The DPSS Global Sales Manager issued a containment letter to the DPSS Sales Staff who then contacted distributors to return suspect parts to Delphi.
  - July 10, 2014 – DPSS sales team began phone calls to all customers Delphi sold suspect parts to in an effort to immediately contain and return suspect parts.
  - July 21, 2014 – Delphi conducted Senior Management Review for disposition on whether the nonconformance was a motor vehicle safety related defect. A decision was made that a safety defect exists and direction is given to notify NHTSA promptly.
7. Not applicable.
8. Delphi's remedy is to replace the nonconforming fuel pump modules with conforming fuel module parts. As noted in the chronology, Delphi has already started the containment and sorting of nonconforming fuel pump modules at dealers and distributors.
9. Not applicable.
10. Delphi will provide copies of distributor / dealer notifications when available.

Please address any questions or communications regarding this matter to the undersigned.

Letter to Nancy Lewis  
July 28, 2014  
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Sincerely,

A handwritten signature in black ink that reads "Gary R. Greib". The signature is written in a cursive style with a large, stylized "G" at the end.

Gary R. Greib  
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5725 Delphi Dr  
Troy, MI 48098-2815  
248-813-3362  
[gary.r.greib@delphi.com](mailto:gary.r.greib@delphi.com)

cc: David Cai, JIAXING JOINHANDS