

## **Honda Recall Notification**

### **Passenger Airbag Inflator Recall**

2001-2005MY Honda Civic

2003-2007MY Honda Accord 4-cylinder

Submit to NHTSA – June 23, 2015

573.6(c)(2)

#### **Identification of potentially affected vehicles:**

T.K. Holdings Inc. (“Takata”) determined that a safety-related defect exists in certain passenger’s frontal airbag inflators, as set forth in the equipment defect notifications designated as 15E-042 and 15E-043 that were filed by Takata on May 18, 2015. The Takata Defect Information Reports “contemplate[d] the potential for a national recall, subject to the determinations of NHTSA” in consultation with Takata and vehicle manufacturers. See Defect Information Report for 15E-042, at 1; Defect Information Report for 15E-043, at 1. The Consent Order between Takata and NHTSA issued in EA15-001 (dated May 18, 2015) similarly “contemplated that NHTSA [would] retain authority to issue orders addressing the potential geographic expansion of recalls for the PSPI and the PSPI-L Takata Inflators covered by two of the DIRs attached hereto.” *Id.* at 9. The Consent Order further stated that “[a]ny order requiring the geographic expansion of such recalls shall be issued only after consultation with Takata and the affected vehicle manufacturers and shall be based on a finding by NHTSA that the then-current results of testing and analysis . . . of the relevant Takata Inflators as well as the consideration of the risk to safety that is presented necessitate the expansion of the recall.” *Id.*

On May 27, 2015, American Honda Motor Co., Inc. (“AHM”) submitted a Defect Information Report stating that, based on the Takata equipment defect notifications identified above, Honda Motor Company, Ltd. (“Honda”) had determined that a defect in the PSPI and PSPI-L Takata Inflators covered by the two DIRs existed in model years 2004-2007 Honda Accord vehicles (as set forth in 15E-042) and model years 2003 Honda Accord and 2001-2005 Honda Civic vehicles (as set forth in 15E-043). (Although Takata identified that model year 2006 Honda Civics also were affected, that identification appears to be in error, as model year 2006 Honda Civics were not produced using either Takata PSPI or PSPI-L airbag inflators.)

Takata’s equipment defect notifications also asserted that unique vehicle-specific characteristics are pertinent to the identification of the models and model years of vehicles that it identified as being potentially affected by the safety-related defect(s), but Takata had not, and has not yet, revealed the basis for its identification of potentially affected vehicles, and AHM is not aware of testing, analyses, or data that support Takata’s assertion or its identification of potentially affected vehicles. Nevertheless, consistent with Takata’s equipment defect notifications, which contemplated the potential for a national recall, AHM’s defect information report indicated that it would begin a recall that would initially target the specified model year Honda vehicles that were originally sold in or ever registered in, geographic locations known for high absolute humidity within the United States and its outlying territories: Alabama, Florida, Georgia, Hawaii, Louisiana, Mississippi, South Carolina, Texas, Puerto Rico, U.S. Virgin Islands, Saipan, Guam, and American Samoa.

On June 1, 2015, NHTSA, through its Acting Associate Administrator for Enforcement, informed AHM that the recall contemplated by AHM’s defect information report, consistent with and as explained in NHTSA’s May 19, 2015 Consent Order to Takata and Takata’s Defect Information Reports, must be national in scope with a phased remedy approach to target higher risk vehicles as phased by subsequent NHTSA order.

Based on Takata's Defect Information Reports, and given NHTSA's instructions and in anticipation of NHTSA's subsequent phasing orders as set forth and explained in NHTSA's May 19, 2015 Consent Order to Takata and Takata's Defect Information Reports, Honda is filing this Defect Information Report to recall model years 2003-2007 Honda Accord vehicles and model years 2001-2005 Honda Civic vehicles, wherever located in the United States and its territories, to replace the PSPI and PSPI-L passenger side airbag inflators contained in those vehicles.

Should further information from Takata or NHTSA be revealed to Honda (or otherwise developed) and indicate the necessity for an expansion of this recall, AHM will expand the recall population initially identified by Takata to cover other vehicles.

Honda will submit to NHTSA the full volume of Honda vehicles and all the affected VIN ranges, once the information becomes available. Honda further states that all VINs will be loaded into the appropriate electronic "look-up tool," with messages to consumers tailored to cover the consumer's appropriate status, based on phasing and risk as explained above.

573.6(c)(3)

**Total number of potentially affected vehicles:** ~2.3 million

573.6(c)(4)

**Percentage of affected vehicles that contain the defect:** Unknown

**Description of the basis for the determination of the recall population:**

The initial recall population was determined based on manufacturing records. According to the safety-defect determination set forth in Takata's equipment defect notifications and NHTSA's subsequent instruction to conduct a national recall, the VIN range reflects the vehicles that could potentially experience the problem.

Should further information be provided to Honda from Takata or NHTSA (or otherwise developed) indicate it necessary or required, AHM will expand the recall population initially identified by Takata to cover other vehicles.

573.6(c)(5)

**Defect description:**

According to the equipment defect notifications (15E-042, 15E-043) filed by Takata, in certain vehicles that were originally sold in, or ever registered in, geographic locations with high absolute humidity, a passenger frontal airbag inflator that originally was installed in a subject vehicle, or that was installed in a subject vehicle after a post-manufacture airbag deployment, could exhibit a symptom of producing excessive internal pressure. If an affected airbag deploys, the increased internal pressure may cause the inflator to rupture. In the event of an inflator rupture, metal fragments could be propelled upward toward the windshield, or downward toward the front passenger's foot well, potentially causing injury to a vehicle occupant. As noted above, Takata also has asserted that certain models and model year vehicles are more susceptible than others to the defect(s) at issue in these recalls. To date, AHM has not been provided with, and is not aware of, the basis for such a contention.

NHTSA informed AHM that the recall must be national in scope and not limited (for owner notification purposes) to areas of high absolute humidity. (In order to avoid confusing Honda owners concerning the remedy program and to encourage owners to heed recall notifications, vehicles that received a remedy for a prior recall or safety improvement campaign [13V-132, 14V-349, 14V-353, 14V-700] are not included in this recall at this time.)

573.6(c)(2)(iv)

**Identification of affected component:**

Component: Front Passenger Airbag Inflator  
Country of Origin: USA  
Manufacturer: T.K. Holdings, Inc.  
Contact Name: Kazuo Higuchi  
Address: 888 16<sup>th</sup> Street NW, Suite 800, Washington, DC 20006  
Telephone No.: (202) 729-6332

573.6(c)(6)

**Chronology:**

May 18, 2015

Takata submitted equipment defect notifications (15E-042, 15E-043) to NHTSA that identified a safety-related defect in the subject passenger frontal airbag inflators. Takata and NHTSA also executed a Consent Order in EA15-001. Copies of Takata's notifications and the Consent Order were received by Honda on May 19, 2015.

May 25, 2015

Based on the determination by Takata that a safety-related defect exists in the subject inflators, as set forth in the equipment defect notifications (15E-042, 15E-043) filed by Takata, and the content of the Consent Order, Honda decided to conduct a safety recall in areas of absolute high humidity, with the potential to expand to a national recall.

May 27, 2015

AHM submitted a defect information report to NHTSA proposing a safety recall limited to affected vehicles in areas of high absolute humidity with the potential to conduct a national recall if deemed necessary based on test results and other information.

June 1, 2015

NHTSA informed AHM that the recall contemplated in the DIR submitted on May 27, 2015, must be national in scope. NHTSA reiterated this instruction on June 4, 2015.

June 11, 2015

Based on the foregoing, Honda decided to conduct a nationwide safety recall.

June 12, 2015

AHM filed a DIR reflecting the June 11 decision.

June 15, 2015

NHTSA acknowledged receipt of the June 12 DIR.

June 18, 2015

AHM filed an amended DIR.

June 23, 2015

After further discussion with NHTSA, AHM filed this revised DIR.

573.6(c)(8)(i)

**Program for remedying the defect:**

NHTSA has published a "Notice of Intent to Open a Coordinated Remedy Program Proceeding for the Replacement of Certain Takata Air Bag Inflators." See 80 Fed. Reg.

29791 (May 22, 2015). On June 5, 2015, NHTSA published a notice opening such a proceeding. (80 Fed. Reg. 32197). Subject to the orders, if any, issued in that proceeding, AHM anticipates that the owners of all affected vehicles will be contacted by mail and, depending on vehicle location and history, either be informed of the existence of a defect and told that parts are not available to conduct the recall repair or be informed of the existence of a defect and asked to take their vehicle to an authorized Honda or Acura automobile dealer. The dealer will replace the passenger frontal airbag inflator, free of charge. (As noted above, to avoid confusion, vehicles that received a remedy for a prior recall or safety improvement campaign [13V-132, 14V-349, 14V-353, 14V-700] already received a new inflator, and therefore are not included in this recall at this time.) If a replacement part is not available, dealers will work with owners to accommodate owner needs.

573.6(c)(8)(ii)

<b>The estimated date for dealer notification:</b>	06/15/15
<b>The estimated date to begin sending notifications to owners:</b>	07/13/15
<b>The estimated date of completion of the notification:</b>	08/11/15

573.6(c)(11)

**Manufacturer's campaign number:** JS1-Accord, JS2-Civic