

**HONDA**

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

June 4, 2020

Mr. Jeffrey Giuseppe  
Associate Administrator for Enforcement  
National Highway Traffic Safety Administration  
Attn: Recall Management Division (NVS-215)  
1200 New Jersey Avenue, SE  
Washington, D.C. 20590

Re: Part 573, Defect Information Report  
2019 Honda Clarity (Electric, Fuel Cell, and Plug-in Hybrid)  
Rear Seat Belt Assembly

Dear Mr. Giuseppe:

In accordance with the National Traffic and Motor Vehicle Safety Act and 49 CFR Part 573 Defect and Noncompliance and Responsibility Reports, Honda is submitting the enclosed Defect Information Report regarding a safety recall of certain 2019 Honda Clarity (Electric, Fuel Cell, and Plug-in Hybrid) vehicles to address a defect with the rear seat belt assembly.

If you have any questions about this report, please feel free to contact me.

Sincerely,

AMERICAN HONDA MOTOR CO., INC.



Jeff Chang  
Senior Manager  
Product Regulatory Office

573.6(c)(1)

**Name of manufacturer:** Honda Motor Co., Inc.

**Manufacturer's agent:** Jeff Chang  
American Honda Motor Co., Inc.  
1919 Torrance Blvd.  
Torrance, CA 90501-2746

573.6(c)(2)

**Identification of potentially affected vehicles:**

<u>Make/Model</u>	<u>Model Year</u>	<u>Dates of Manufacture</u>	<u>Number of Vehicles</u>
Honda Clarity Electric	2019	08/23/2019 to 09/06/2019	8
Honda Clarity Fuel Cell	2019	08/22/2019 to 08/24/2019	10
Honda Clarity Plug-in Hybrid	2019	08/23/2019 to 08/24/2019	110

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

The recall population was determined based on manufacturing records and supplier part production records. The manufacturing range reflects all possible vehicles that could potentially experience the problem.

**Description of how the vehicles being recalled differ from similar vehicles not included in the recall:**

Supplier part production records identified a specific production period during which rear seat belt assemblies were affected by an improper manufacturing process. Similar vehicles not included in the recall were installed with rear seat belt assemblies manufactured outside of the suspect production period.

**Identification of affected component:**

Component: Rear Seat Belt Set

Part No.:	Center	Right Outer	Left Outer
	04823-TRT-A01ZB	04824-TRT-A01ZA	04828-TRT-A01ZA
	04823-TRT-A01ZC	04824-TRT-A01ZB	04828-TRT-A01ZB
	04823-TRT-A01ZE	04824-TRT-A01ZC	04828-TRT-A01ZC
		04824-TRT-A01ZE	04828-TRT-A01ZE

Country of Origin: Japan

Manufacturer: Joyson Safety Systems Japan, K.K.

573.6(c)(3)

**Total number of potentially affected vehicles:** 128

573.6(c)(4)

**Percentage of affected vehicles that contain the defect:** 1%

573.6(c)(5)

**Defect description:**

The rear seat belt assemblies installed on affected vehicles have dual locking mechanisms that operate independently of one another to lock the seat belt: the vehicle sensor, which engages during vehicle deceleration, and the webbing sensor, which engages during rapid seat belt extension. Due to incorrect manufacturing of the rear seat belt assembly, the webbing sensor in the assembly could become inoperative and, if the vehicle sensor fails to engage during a crash, proper restraint may not be provided to a belted occupant, increasing the risk of an injury.

573.6(c)(6)

**Chronology:**

September 9, 2019

The supplier informed Honda that another automaker experienced a defect in the dual locking mechanism in the same type of rear seat belt assembly supplied to Honda. The tooling used to produce the rear seat belt retractor, which was recently adjusted during summer production shutdown, could inadvertently bend the pawl spring and render the webbing sensor inoperative. Honda requested that the supplier provide additional information about the defect and expected occurrence rate.

October 8, 2019

The supplier informed Honda the defect was limited to the webbing sensor – the vehicle sensor remained operational and able to engage regardless of the webbing sensor's operability. Based on this information, Honda judged the rear seat belts were in compliance with FMVSS 209, Seat belt assemblies. The supplier predicted very few future occurrences and Honda decided to continue monitoring the situation.

December 2019 to January 2020

Honda became aware that other automakers filed Defect Information Reports for rear seat belt assemblies similar to those installed in Honda vehicles.

February 14, 2020

Honda became aware that the supplier and NHTSA had met regarding the design of the supplier's rear seat belt assemblies.

March 6, 2020

Honda became aware that the supplier had submitted a Defect Information Report for rear seat belt assemblies supplied to seven automakers, including Honda.

May 28, 2020

Honda determined that a defect related to motor vehicle safety existed and decided to conduct a safety recall.

As of May 28, 2020, Honda has not received any warranty claims or field reports, nor any reports of injuries related to this issue.

573.6(c)(8)(i)

**Program for remedying the defect:**

Registered 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 manufacturing labels on the left, center, and right rear seat belt assemblies. If the label indicates the rear seat belt assembly was produced during the suspect manufacturing period, the rear seat belt assembly(s) will be replaced for free. Because the new vehicle limited warranty on all affected vehicles would have provided a free repair for the problem addressed by this recall, without any payment by the owner, reimbursement for pre-notification repairs will not be offered.

573.6(c)(8)(ii)

**The estimated date to start notification to dealers:** June 5, 2020

**The estimated date to start notifications to owners:** July 13, 2020

573.6(c)(10)

**Representative copies of all notices, bulletins and other communications:**

A copy of the dealer service bulletin, the final owner notification letter and other dealer communication will be submitted to your office as soon as possible.

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

573.6(c)(11)

**Manufacturer's campaign number:** Z7L