

**HONDA**

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

July 28, 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, Noncompliance Information Report  
2019 – 2020 Model Year Honda Odyssey, 2019 – 2020 Model Year Honda Passport,  
and 2019 – 2021 Model Year Honda Pilot  
Display Audio

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 Noncompliance Information Report regarding a safety recall of 2019 – 2020 model year Honda Odyssey, 2019 – 2020 model year Honda Passport, and 2019 – 2021 model year Honda Pilot vehicles to address a noncompliance with FMVSS 111; Rear visibility.

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

## **Noncompliance Information Report**

573.6(c)(1)

**Name of manufacturer:** Honda of America Mfg., 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 Odyssey	2019	04/12/2018 to 08/13/2019	131,729
Honda Odyssey	2020	09/11/2018 to 07/16/2020	70,860
Honda Passport	2019	11/06/2017 to 10/23/2019	33,920
Honda Passport	2020	06/20/2019 to 07/16/2020	19,409
Honda Pilot	2019	09/18/2017 to 07/31/2019	137,996
Honda Pilot	2020	06/18/2019 to 06/22/2020	96,427
Honda Pilot	2021	10/15/2019 to 07/16/2020	9,001

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

The recall population was determined based on manufacturing 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:**

- 1) 2018MY Honda Odyssey vehicles equipped with the affected component are not included in the recall as these vehicles were not subject to the phase-in period requirements nor final requirements of FMVSS No. 111; Rear Visibility. Honda did not certify these vehicles for phase-in compliance, nor were they built on or after the date of May 1, 2018, when all FMVSS No. 111 requirements applied to all vehicles. Therefore, Honda will conduct a Product Update Campaign to notify owners of 2018MY Odyssey vehicles of the same free remedy as provided under this recall.
- 2) Similar vehicles built on or after July 20, 2020 are not included in the recall, as these vehicles were equipped with reprogrammed display audio systems compliant with the requirements of FMVSS No. 111 as of that date. Similar vehicles built before July 20, 2020 that were within American Honda's control were remedied prior to dealer delivery.
- 3) The base model trims (LX or Sport) of similar vehicles are not included in the recall, as the affected component is not equipped on these vehicles.

### **Identification of affected component:**

Component: Unit Assy, Infotainment Control  
Part No.: See attached document  
Country of Origin: USA  
Manufacturer: DENSO International America, Inc.

573.6(c)(3)

**Total number of potentially affected vehicles:** 499,342

573.6(c)(4)

**Percentage of affected vehicles that contain the noncompliance:** 100%

573.6(c)(5)

**Noncompliance description:**

Many in-cabin system interfaces are linked to a central network, including the instrument panel, display audio, and rearview camera display. Due to inappropriate software programming, several errors in the central network may occur that either delay or prevent the rearview camera image from displaying. A delayed or inoperative rearview camera display does not comply with requirements of FMVSS No. 111, and can reduce the driver's view of what is behind the vehicle, increasing the risk of a crash.

573.6(c)(7)

**Determination of noncompliance:**

July 2018

Honda received internal reports of a frozen display audio screen found during vehicle testing validation, which were caused by two separate issues.

September 2018

Honda received an internal report of delayed rearview camera display found during vehicle testing validation.

November 2018

Honda received the first market claim of a frozen display audio screen, which was unrelated to the two issues identified in July 2018.

January 2019

Honda received an internal report of a frozen display audio screen found during vehicle testing validation, which was unrelated to the issues previously identified in July and November 2018.

March 2020

Honda found another, unrelated issue of a frozen display audio screen during software validation testing.

July 21, 2020

Honda determined that FMVSS noncompliance existed and decided to conduct a noncompliance recall.

573.6(c)(8)(i)

**Program for remedying the noncompliance:**

Registered owners of all affected vehicles will be mailed instructions on how to download and install the software programming updates for free. Registered owners may also visit an authorized Honda dealer, and the dealer will update the software programming 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:** July 29, 2020  
**The estimated date to start notifications to owners:** September 23, 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:** Y7Y