2020MY Telluride Halogen Headlamp Assembly Basis of Safety Defect Determination 573.6(c)(6)

January 4, 2023	NHTSA's Office of Defects Investigation (ODI) contacts Kia North America (Kia NA) Safety Office regarding complaints of loss of high beams involving the 2020MY Telluride.
January 11, 2023	Kia NA Safety Office provides technical information pertaining to 2020MY Telluride headlamp assembly, overview of inoperable high beam condition and how condition does not impact low beam operation, and its analysis of the VOQs.
January 27, 2023	ODI opens Preliminary Evaluation (PE23-002) to investigate complete loss of high beams with no re-engagement or warning resulting in reduced visibility.
February 15, 2023	ODI issues PE23-002 information request (IR) letter to Kia NA Safety Office.
March 1, 2023	Kia NA Safety Office provides additional engineering information of inoperable high beam condition to ODI during meeting and identifies plan to extend warranty to 15 years / 150,000 miles to address customer satisfaction issue.
March 29, 2023	Kia NA Safety Office submits its response to PE23-002 IR letter and concludes loss of high beams does not create an unreasonable risk to motor vehicle safety given the low customer usage rate of high beams, the continued operability of the low beams, and NHTSA's precedent and enforcement history of issue.
April 25, 2023	Kia NA notifies owners of warranty extension campaign. Kia NA Safety Office continues to monitor field data.
October 13, 2023	In an effort to increase customer awareness, Kia NA renotifies owners of the extended warranty campaign.
January 24, 2024 – February 18, 2024	ODI meets with Kia NA Safety Office to review data received after IR response. ODI requests Kia NA Safety Office consider conducting recall of the 2020MY Telluride equipped with halogen headlamps in light of continuing customer complaints and new approach to evaluating loss of high beams issues. Kia NA Safety Office updates field data and identifies 4,975 warranty claims, 839 techline cases and 543 customer complaints [dates of receipt 3/1/2019—2/15/2024]. No injuries or fatalities. Three (3) alleged but unconfirmed deer strikes.

February 19, 2024	Kia NA decides to recall certain 2020MY Telluride vehicles
	equipped with halogen headlamp assemblies.