



U.S. Department  
of Transportation  
**National Highway  
Traffic Safety  
Administration**

1100 New Jersey Avenue SE,  
Washington, DC 20590

AUG 19 2009

**CERTIFIED MAIL**  
**RETURN RECEIPT REQUESTED**

Mr. William R. Willen  
Managing Counsel  
American Honda Motor Co.  
1919 Torrance Blvd.  
Torrance, CA 90501-2746

NVS-215/jtt  
09V-259

**Re: Additional Information Required on Safety Recall 09V-259**

Dear Mr. Willen:

This serves as a request for further information concerning safety recall 09V-259. The recall concerns certain 2001 model year Honda Accord and Civic vehicles that Honda Motor Co., Ltd. (HMC) decided have a safety-related defect. As explained in HMC's defect information report, this safety recall is an expansion of safety recall 08V-593 which involved the same model and model year vehicles.

As with its defect information report filed in safety recall 08V-593, HMC explained that the driver's airbag inflator may produce excessive internal pressure that, in the event of airbag deployment, could cause the inflator to rupture. This rupture could cause metal fragments to pass into the vehicle compartment possibly causing injury to vehicle occupants.

Upon further review of the defect information report, the Recall Management Division (RMD) requires additional information to understand why HMC did not include the current population in safety recall 08V-593, and to evaluate the timeliness of HMC's recent defect decision. Please answer the following, repeating before each response the question asked. Please also produce copies of any documentation supporting your answers.

1. How did HMC determine which vehicles to include in the 08V-593 recall population? Explain the difference between the driver's airbag inflators in those vehicles from the inflators in the 09V-259 vehicles and explain how this distinction, or any other between



the two sets of vehicles, convinced HMC at the time that it did not need to include the latter set in the 08V-593 recall population.

2. How is HMC determining which vehicles to include in the 09V-259 recall population?
3. Is HMC certain that it has identified and made a defect decision as to all of its U.S. vehicle products that could contain the defect identified in 08V-593 and 09V-259? If so, on what basis is HMC certain? If not, why has HMC not made a safety defect decision as to those other vehicles?
4. Separately, for each category listed, state the number and dates of receipt for all of the following in relation to the safety defect identified and the vehicles in 08V-593:
  - a. Complaints
  - b. Warranty claims (paid or unpaid)
  - c. Field reports
  - d. Lawsuits
5. Separately, for each category listed, state the number and dates of receipt for all of the following in relation to the safety defect identified and the vehicles in 09V-259:
  - a. Complaints
  - b. Warranty claims (paid or unpaid)
  - c. Field reports
  - d. Lawsuits
6. With respect to the chronology in HMC's defect information report in 09V-259, please describe the unusual driver airbag deployments referenced and explain why HMC considers them unusual.
7. Please clarify to what investigation HMC is referring when it says that on June 23, 2009, it completed "the investigation" and determined that 08V-593 should be expanded. RMD is confused by HMC's terminology because earlier HMC indicated the investigation was for returned inflators of the 08V-593 recall. RMD does not understand the correlation between an investigation conducted on inflators not used on the 09V-239 recall population, and HMC's decision to recall the 09V-239 vehicles.
8. Identify and describe all information, including testing, complaints, claims, inspections, and reports that any Honda company considered in evaluating whether the safety defect was present in vehicle outside the 08V-593 recall population. For each item of information, and to the extent not previously provided in response to another question, identify which Honda company received or conducted it and when, and then identify which Honda company evaluated or considered it and when.

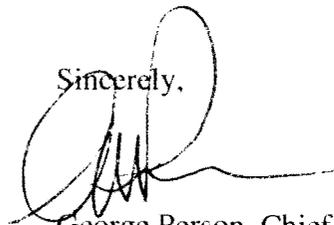
Please provide the requested information no later than September 16, 2009. Please also update and amend the company's information report such that it includes any information required to be provided under 49 CFR 573.6, and that was not provided in the original, June 2009, report. We note that items such as the VIN ranges for the recalled vehicles, and the estimated dates for mailing owner notifications and providing notice to dealers about the defect and recall, have yet to be provided.

This letter is issued pursuant to 49 U.S.C. § 30166 which authorizes the NHTSA to request any information that it deems necessary in administering and enforcing the Motor Vehicle Safety Act of 1969, as amended, 49 U.S.C. 30101, et seq. Failure to respond promptly, truthfully, and completely to this letter and the inquiries made herein could subject HMC to significant civil penalties and/or a claim for injunctive relief.

If HMC claims that any of the information or documents provided in response to this information request constitute confidential commercial material within the meaning of 5 U.S.C. § 552(b)(4), or are protected from disclosure pursuant to 18 U.S.C. § 1905, the company must submit supporting information together with the materials that are the subject of the confidentiality request, to the Office of Chief Counsel, National Highway Traffic Safety Administration, 1200 New Jersey Ave., SE, Washington, D.C. 20590. Please see 49 CFR Part 512 for further instructions as to what is required to properly file a request for confidential treatment.

Please direct your response to Jennifer Timian of my staff, and note conspicuously on your response the safety recall number assigned to this matter (e.g., 09V-259). Should you have any questions or concerns, please contact Ms. Timian on (202) 366-0209 or by email at [jennifer.timian@dot.gov](mailto:jennifer.timian@dot.gov).

Sincerely,

A handwritten signature in black ink, appearing to read 'G. Person', with a large, looping flourish above the name.

George Person, Chief  
Recall Management Division