

September 16, 2009

NVS-215/jtt  
09V-259

Mr. George Person, Chief  
Recall Management Division  
Office of Defects Investigation  
U.S. DEPARTMENT OF TRANSPORTATION  
National Highway Traffic Safety Administration  
1200 New Jersey Ave., SE  
Washington, DC 20590

Dear Mr. Person:

In reply to your letter dated August 19, 2009, we are submitting our response to additional information requested concerning safety recall 09V-259.

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.**

*The determination of the vehicle population for the 08V-593 campaign was based on information provided by TK Holdings, Inc., on the causal factors and production history of airbag inflators. At the time the 08V-593 campaign was initiated we understood the causal factors to be related to airbag propellant due to handling of the propellant during airbag inflator module assembly.*

*Basically, there are no design or other differences between the airbag inflators involved in the original campaign or the expanded campaign. We (Honda and TK Holdings, Inc.) believe that any differences between those two vehicle populations, as well as differences between vehicles included in the expanded campaign and those excluded from the campaign are related to production of the airbag propellant prior to assembly of the inflators.*

*Based on additional deployments similar to those that led Honda to initiate the 08V-593 campaign but outside of the range of the recall population for that campaign, we now believe the causal factors to be related to a specific production process at a TK Holdings, Inc. facility that manufactured and formed the propellant. Using manufacturing records and our current understanding of the cause of the excessive pressure in the inflator modules, the 09V-259 campaign is expected to capture all affected vehicles.*

*Specifically, based on information from TK Holdings, Inc., we believe the cause to be related to the process of pressing the propellant into wafers that were later installed into the inflator modules. The affected units seem to exhibit properties that are limited to one production process involving one of several high-precision compression presses that were used to form the propellant into wafers.*

2. **How is HMC determining which vehicles to include in the 09V-259 recall population?**

*Comparing the incidents that have occurred to date, production records and measurable characteristics of the wafers, such as density and crush strength, we believe we have correctly identified the affected propellant wafer production.*

*Once the characteristics of the suspect wafers were identified by TK Holdings, Inc., the propellant lot production history was compared against inflator assembly production records, which includes serial*

*numbers for each inflator. From this information the Honda factory that installed the airbag modules into vehicles matched the airbag inflator module serial number to the VIN of the vehicle in which it was installed. This is the method of determining the 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 09V-593 and 09V-249? If so, on what basis is HMC certain? If not, why has HMC not made a safety defect decision as to those other vehicles?**

*Based on our current understanding of the causal factors and the characteristics of suspect inflators as determined by TK Holdings, Inc., we believe that we have included all vehicles that could be affected by this defect.*

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**

*Honda has received 3 customer relations complaints related to the safety defect identified in campaign 08V-593 to date, filed on the following dates:*

*February 15, 2007*

*June 4, 2007*

*July 25, 2008*

**b. Warranty claims (paid or unpaid)**

*Honda has received no (0) warranty claims related to the safety defect identified in campaign 08V-593 to date.*

**c. Field reports**

*Honda has no (0) field reports related to campaign 08V-593 to date.*

**d. Lawsuits**

*Honda has had one lawsuit related to the safety defect identified in campaign 08V-593, filed on the following date:*

*July 6, 2007*

*Please note that we recently learned of an earlier unusual deployment that occurred in May, 2004. This event was reported to Honda in 2004, and the information was shared with TK Holdings, Inc. at that time. We only recently were reminded of this incident, and are now studying it again to determine if this deployment was due to the same causal factors as the events that led to campaign 08V-593. Until re-discovering this earlier event in the past month, we had not associated it with the 08V-593 campaign.*

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**

*Honda has received 5 customer relations complaints related to the safety defect identified in campaign 09V-259 to date, filed on the following dates:*

*April 29, 2009*

*May 29, 2009  
July 27, 2009  
July 31, 2009  
August 31, 2009*

**b. Warranty claims (paid or unpaid)**

*Honda has received no (0) warranty claims related to the safety defect identified in campaign 09V-259 to date.*

**c. Field reports**

*Honda has no (0) field reports related to campaign 09V-259 to date.*

**d. Lawsuits**

*Honda has had no (0) lawsuits related to the safety defect identified in campaign 09V-259.*

**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.**

*Each of the incidents identified in the chronology for both the 08V-593 and 09V-259 campaigns exhibited similar characteristics. Each of the incidents included some form of separation of the metal airbag inflator shell, resulting in metal fragments of the shell being propelled through the airbag fabric. In most cases the metal fragments were relatively small, though in one instance it appears that the second stage of the two-stage inflator became separated from the inflator module and was propelled toward the driver. Each of these incidents appears to share a common thread of being the result of overpressurization of the airbag inflator module.*

*Because the design of the airbag inflator module specifies that the pressure of the inflator gas open the vent covers when filling the airbag, we consider any deviation from that design intent to be an unusual deployment.*

**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 [sic] recall population, and HMC's decision to recall the 09V-239 [sic] vehicles.**

*"The investigation" completed on June 23, 2009 is a reference to the analysis of airbag inflators returned in response to the 08V-593 campaign. This is the same investigation referenced in the November 11, 2008 entry in the chronology of the 09V-259 recall notification letter to NHTSA.*

**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 find attached the presentation titled "Presentation to Honda American Manufacturing" which was prepared by TK Holdings, Inc. for presentation to Honda on October 2, 2008. This document includes all of the analysis and testing relative to campaign 08V-593 and was the basis for the determination to conduct a recall on the driver's airbag inflators. Please note that some of the information included in this document was later found to contain incorrect assumptions. The*

*presentation, except for the title page contains confidential information and is being submitted to the Chief Counsel's office as a Request for Confidentiality. The redacted version is attached as part of our response.*

*With respect to claims and inspections the attached table identifies each of the nine claims received by Honda to date, which Honda company received the claim and whether the claim was included in the population of the original 08V-593 campaign or the expanded 09V-259 campaign. The earlier claim referenced in response to Q4 is labeled as Case 0 as we attempt to determine if this was due to the same cause as the incidents that prompted campaign 08V-593.*

Sincerely,

AMERICAN HONDA MOTOR CO., INC.

A handwritten signature in dark ink, appearing to read 'William R. Willen', followed by a horizontal line.

William R. Willen  
Managing Counsel  
Product Regulatory Office

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Attachments

09V-259  
Additional Information  
Sept. 16, 2009

Attachment Q8



# Presentation to Honda American Manufacturing



October 2, 2008

**TK Holdings Inc.**





































































