April 11, 2013

VIA FAX AND FIRST CLASS MAIL

National Highway Traffic Safety Administration (NHTSA)
Executive Secretariat
1200 New Jersey Ave. SE
West Building
Washington, DC 20590

FOIA REQUEST

Dear FOIA Officer:

The Center for Auto Safety ("CAS") files this request pursuant to the Freedom of Information Act ("FOIA"). CAS is a nationwide nonprofit consumer advocacy organization established in 1970 by Consumers Union and Ralph Nader. CAS works toward improved safety, environmental responsibility, and fair dealing in the automotive industry and the marketplace.

CAS seeks the following information:

All records related to any investigations, meetings, and communications (via telephone, email, WebEx, or in person) involving NHTSA and Honda, the occurrence of which is indicated by the attached Part 573 for NHTSA Recall # 13V-132.

CAS believes that the requested records are likely to be located within the Office of Defects Investigation, the Office of Chief Counsel, and the Office of the Administrator. These documents may include electronic as well as paper records. Also, pursuant to 5 U.S.C. § 552(a)(4)(A) and U.S. Department of Transportation regulations set forth at 49 C.F.R. § 7.44, CAS requests, and NHTSA should grant, a waiver and/or reduction of fees for processing this FOIA request, including search, review, and duplication charges, for the reasons given below.

49 C.F.R. § 7.44(a) and (c) provide that a fee is not to be charged for the first two hours of search time or the duplication of the first 100 pages, "unless the records are requested for commercial use." In addition, 49 C.F.R. § 7.44(d) states that review fees for determining whether the requested records are exempt from mandatory disclosure may not be charged when records are not requested for a commercial use. The above information request is of a very limited and highly specific nature, and CAS believes that these records have no commercial value whatsoever. Even if the requested records had
some potential commercial value, CAS has no commercial purpose or interest in requesting them. See Attachment A. Therefore, NHTSA should fully apply the subsection (a), (c) and (d) allowances to this request.

Should NHTSA deny the waiver of fees, CAS asks that the Agency to obtain authorization from CAS before delivery of any materials. If the agency refuses access to any of the requested records, please describe the materials it wishes to withhold and specify the statutory justifications for the refusal. Also, please state separately NHTSA's reasons for failing to invoke its discretionary powers to release the materials in the public interest.

If you have any questions about the scope of this request, or if you believe there are any ambiguities in the way CAS has framed its request, please let me know as soon as possible.

CAS looks forward to a response within twenty working days, as required under the FOIA, and will interpret any delay in response as a denial of this request. Thank you for your very prompt attention to this matter.

Sincerely,

Michael Brooks
Staff Attorney

Attachment(s): 2
April 10, 2013

Ms. Nancy Lewis
Associate Administrator for Enforcement
NATIONAL HIGHWAY TRAFFIC SAFETY ADMINISTRATION
Attn: Recall Management Division (NVS-215)
1200 New Jersey Avenue, SE
Washington, DC 20590

Re: Recall Notification

Dear Ms. Lewis:


573.6(c)(1)
Name of manufacturer:
Honda Motor Co., Ltd. (HMC)
Honda of America Mfg., Inc. (HAM)
Honda of Canada Mfg. (HCM)
Honda of the UK Mfg. Ltd (HUM)
Honda Mfg. of Alabama, LLC (HMA)

Manufacturer's agent:
Jay Joseph
American Honda Motor Co., Inc. (AHM)
1919 Torrance Blvd.
Torrance, CA 90501-2746

573.6(c)(2)
Identification of potentially affected vehicles:
See ATTACHMENT 1

Description of the basis for the determination of the recall population:
The recall population was determined based on manufacturing records. The VIN range reflects all possible vehicles that could potentially experience the problem.
573.6(c)(2)(iv)

Identification of affected component:
Component: Front Passenger Airbag Inflator
Country of Origin: U.S.A.
Manufacturer: T.K. Holdings, Inc.
Contact Name: Kazuo Higuchi
Address: 888 16th Street, NW, Suite 800
          Washington, DC 20006
Telephone: (202) 729-6332

573.6(c)(3)
Total number of potentially affected vehicles: 561,422

573.6(c)(4)
Percentage of affected vehicles that contain the defect: Unknown

573.6(c)(5)
Defect description:
In certain vehicles, the passenger’s (frontal) airbag inflator could produce excessive internal pressure. If an affected airbag deploys, the increased internal pressure may cause the inflator to rupture. In the event of an inflator rupture, metal fragments could be propelled upward toward the windshield, or downward toward the front passenger’s foot well, potentially causing injury to a vehicle occupant.

573.6(c)(6)
Chronology:
October 20, 2011 Alleged rupture of a passenger airbag inflator occurred in Puerto Rico.
February 3, 2012 The vehicle from Puerto Rico was received by Honda for analysis. Investigation of the vehicle confirmed a ruptured passenger airbag inflator.
March 14, 2012 Using the ongoing driver’s airbag recall, Honda proposed to NHTSA the collection of healthy passenger airbag modules to study the condition. NHTSA did not object.
November 21, 2012 Investigation of healthy parts indicated abnormal combustion was possible, though the cause could not be determined at that time.
February 8, 2013 A meeting was held between NHTSA and Honda to discuss the ongoing investigation.
March 6, 2013  A recreation of propellant production using the same methods as
were used during 2001-2002 production periods indicated that it
was possible for propellant produced during 2001-2002 to be
manufactured out of specification without the manufacturing
processes correctly identifying and removing the out of
specification propellant.

Separately, Honda was informed by the supplier of another
potential concern related to airbag inflator production that could
affect the performance of these airbag modules.

April 4, 2013  Honda completed the investigation and determined that a safety
related defect exists and decided to conduct a recall.

As of April 4, 2013 Honda has not received any warranty claims, but has received
one field report regarding a crash where the passenger airbag inflator ruptured upon
deployment, without report of injury from the inflator.

573.6(c)(8)(i)

Program for remedying the defect:
The owners of all affected vehicles will be contacted by mail and asked to take their
vehicle to a Honda automobile dealer. The dealer will replace the passenger airbag
inflator, free of charge.

573.6(c)(8)(ii)
The estimated date to e-mail preliminary notification to dealers: April 11, 2013

The estimated date to provide service bulletin to dealers:  April 11, 2013

The estimated date to begin sending notifications to owners: May 11, 2013

The estimated date of completion of the notification: July 2013

573.6(c)(9)
Representative copies of all notices, bulletins and other communications:
A copy of the dealer service bulletin, the final customer notification letter and other
dealer communication will be submitted to your office as soon as possible.

573.6(c)(10)
Proposed owner notification letter submission:
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:
S95

Sincerely,

AMERICAN HONDA MOTOR CO., INC.

Jay Joseph
Senior Manager
Product Regulatory Office

JWJ:cm
<table>
<thead>
<tr>
<th>Attachment 1</th>
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</thead>
<tbody>
<tr>
<td><strong>Honda Civic 2 Door</strong></td>
</tr>
<tr>
<td>Certain 2001 model year</td>
</tr>
<tr>
<td>Certain 2002 model year</td>
</tr>
<tr>
<td>Certain 2003 model year</td>
</tr>
<tr>
<td>9/12/2002</td>
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</tbody>
</table>

| **Honda Civic 4 Door** |
| Certain 2001 model year | 1HGEM21211L125029 | 1HGEM22971L000001 |
| 9/10/2001 | 1HGEM26481L000001 |
| Certain 2002 model year | 1HGEM22042L110829 | 1HGEM16523L000001 |
| Certain 2003 model year | 1HGEM21933L052262 | 1HGEM26787L000001 |
| 4/10/2003 | 7/26/2001 |
|-----------------------------|-------------------------------------|-----------|-----------|
| Honda Civic 4 Door          | JHMES95633S000017                   | 3/5/2002  | 4/19/2003 |
| Honda CR-V                  |                                     |           |           |
|                             | JHLRD68592C000003                   | 6/13/2001 | 9/7/2002  |
|                             | SHSRD78822U000111                   | 2/19/2002 | 9/30/2002 |
| Honda Odyssey               |                                     |           |           |
|                             | 2HKRL18612H600003                   | 6/19/2001 | 8/20/2002 |
|                             | 5FNRL186728000062                   | 10/9/2001 | 8/22/2002 |