ODI Action Number: **EA99-008**

Date: **03-31-99**

Subject: **ISUZU/HONDA**

1998 - 1999 ISUZU RODEO AND AMIGO/HONDA PASSPORT

ALLEGED BRAKING SYSTEM/ABS FAILURES

This file contains consumer letters received by the National Highway Traffic Safety Administration which complain of the alleged defect that is the subject of this Engineering Analysis. It also contains correspondence between this agency and the manufacturer on the subject. Portions of that correspondence may be withheld where the manufacturer has claimed that they are confidential pursuant to the Freedom of Information Act, 5 U.S.C. § 552(b)(4), which exempts from disclosure confidential commercial and financial information. Additional documents relating to this Engineering Analysis may exist, but have not been included in this public file.

If you have any information or concerns you would like to discuss with NHTSA staff, please call the

toll free AUTO SAFETY HOTLINE

800-424-9393

(in the Washington, DC metropolitan area, please call 202-366-0123)

Also, if you wish to discuss the investigation with NHTSA staff, the HOTLINE contact representative will have a technical staff member return your telephone call.

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

ODI RESUME

IDENTIFICATION: EA99-008 DATE OPENED: 31 March 99
SUBJECT: Braking System/ABS Failures
PROMPTED BY: Owner Complaints (PE98-051 and IE98-064)
INVESTIGATOR: Scott Shadle

MANUFACTURER: Isuzu/Honda
MODEL(S): Rodeo and Amigo/Passport
MODEL YEAR(S): 1998 and 1999
VEHICLE POPULATION: 1998 MY - 85,977; 1999 MY - unknown

PROBLEM DESCRIPTION: Consumers alleged that they experienced a loss of braking capability that resulted in extended stopping distance, and/or illumination of the ABS warning lamp During these incidents it is often alleged that the brake pedal "went to the floor" and/or that the incident occurred when driving over a bump or bumps.

FAILURE REPORT SUMMARY

	ODI			Manufacturer*			TOTAL		
	SYMPTOM#**								
	1	2	3	1	2	3	1	2	3
COMPLAINTS:	39	0	0	63	10	134	102	10	134
CRASHES:	12	0	0	22	0	0	34	0	0
# INJURIES:	7	0	0	6	0	0	13	0	0
# FATALITIES:	0	0	0	0	0	0	0	0	0

* Manufacturer complaints have been screened to eliminate those that are duplicates of complaints received by ODI, are not related to the symptoms described below or are related to problems that were diagnosed as the failure of specific components and then repaired

** SYMPTOM #1: Complaints of brake stopping distance performance, including: extended stopping distance, no brakes, brakes disengage, brakes fail or brake/ABS failure, with or without ABS warning lamp illuminated.

SYMPTOM #2: Other complaints of brake or ABS performance or operation, including: brake "pedal drop"/"pedal-to-the-floor," brake pedal feel, or brake noise, with or without ABS warning lamp illuminated

SYMPTOM #3: ABS warning lamp illuminated only.

ACTION: An Engineering Analysis has been opened.

ENGINEER: DIV CHF: OFC DIR:

DATE: 3/31/99 DATE: 3/31/99 DATE: 3/31/99

SUMMARY:

Information gathered prior to the PE Information Request's being sent to the manufacturer:

Isuzu issued a Service Campaign (SB98-09L002) stating that the coil-integrated module (a part of the anti-lock brake system which controls the flow of the brake fluid) needs to be replaced in certain subject vehicles before the vehicles are sold from stock or released from the service department. The ABS system on these vehicles is a Lucas Varity (Kelsey-Hayes) EBC325. Isuzu indicates in the Service Campaign bulletin that the faulty coil-integrated modules result in illumination of the ABS warning lamp and deactivation of the ABS function. At that time, Isuzu began notifying the affected vehicle owners. Four owners that contacted NHTSA specifically mentioned the service campaign in their reports; three indicated that they have not experienced any further problems or ABS lamp illuminations since the service campaign repair was performed, but one owner reported that the service campaign repair did not correct the problem. Another owner reported that their dealer inspected and repaired the vehicle, but the repair was unspecified. An examination of the ODI complaint database revealed 11 consumer complaints related to the above Service Campaign. Thus a PE was opened on September 25, 1998.

Information received after Preliminary Evaluation Information Request (PE-IR) was sent to manufacturer:

ODI received 24 new VOQs alleging brake system failures or performance problems on 1998 Isuzu Rodeos and Honda Passports, 1 VOQ for a 1999 Isuzu Rodeo and 3 VOQs for 1998 Isuzu Amigos. The incidents reported in these VOQs resulted in 10 crashes and 7 injuries.

Information received from the manufacturer in response to PE Information Request:

Isuzu submitted 77 owner/fleet complaints (47 for 1998 Isuzu Rodeo vehicles and 30 for 1998 Honda Passport vehicles), 135 field reports (27 for 1998 Isuzu Rodeo vehicles and 108 for 1998 Honda Passport vehicles), 20 crash/incident claims (all 20 for 1998 Isuzu Rodeo vehicles), 5 third-party arbitration proceedings (4 for 1998 Isuzu Rodeo vehicles and 1 for a 1998 Honda Passport vehicle) and 1 lawsuit summary for a 1998 Isuzu Rodeo; for a total of 238. Attachment 2 of Isuzu's December 3, 1998 response to the PE-IR indicated that there were 185 owner/fleet complaints and 27 field reports; however, an examination of the owner/fleet complaints found that 108 of those submitted for 1998 Honda Passports were actually field reports. It should be noted that the table on the preceding page indicates a total of 207 complaints related to the subject vehicles. Six of items submitted are duplicates of complaints received by ODI, and 25 of the items are either not related to the "SYMPTOMS" described in the Failure Report Summary or involved brake system problems that were diagnosed as failures of specific brake system components and subsequent repairs eliminated the problem.

Analysis of Information received after PE-IR was sent to manufacturer:

The following table summarizes all of the reports of brake system failures/performance problems received by ODI as they relate to the alleged defect and other brake performance problems with the subject vehicles. The information in the table also reflects information gathered during interviews with the complaint vehicle's owner or the driver at the time of the reported incident(s).

NUMBER OF ALL COMPLAINTS, REPORTS, CLAIMS, LAWSUITS AND PROCEEDINGS BY COMPLAINT TYPE				
COMPLAINT TYPE Type of Brake System Performance/Characteristic Mentioned in Complaint	Environmental/Roadway Factors Mentioned in Report			
	NONE	BUMP	WET	BUMP & WET
Brake System Failure (or Malfunction):				
No Specifics Mentioned-	23 / 12 / 4*	5 / 0 / 0	1 / 0 / 0	0 / 0 / 0
Brake System Failure w / Pedal-to-the-Floor / Pedal Drop-	8 / 5 / 4	0 / 0 / 0	0 / 0 / 0	0 / 0 / 0
Brake System Failure w / ABS Lamp "On"-	1 / 0 / 0	0 / 0 / 0	0 / 0 / 0	0 / 0 / 0
Brake System Failure w / Pedal-to-the-Floor / Pedal Drop & ABS Lamp "On"-	1 / 0 / 0	0 / 0 / 0	0 / 0 / 0	0 / 0 / 0
Antilock Brake System Failure / Malfunction-	3 / 2 / 1	0 / 0 / 0	0 / 0 / 0	0 / 0 / 0
Wheel Lockup-	5 / 3 / 2	0 / 0 / 0	0 / 0 / 0	0 / 0 / 0
Extended Stopping Distance:				
No Specifics Mentioned-	15 / 1 / 1	12 / 1 / 0	2 / 0 / 0	1 / 1 / 0
Brake System Failure w / Pedal-to-the-Floor / Pedal Drop-	11 / 6 / 1	8 / 1 / 0	0 / 0 / 0	1 / 0 / 0
Brake System Failure w / ABS Lamp "On"-	2 / 1 / 0	2 / 0 / 0	0 / 0 / 0	0 / 0 / 0
Brake System Failure w / Pedal-to-the-Floor / Pedal Drop & ABS Lamp "On"-	0 / 0 / 0	1 / 1 / 0	0 / 0 / 0	0 / 0 / 0
Total- (SYMPTOM # 1 in FAILURE REPORT SUMMARY)	69 / 30 / 13	28 / 3 / 0	3 / 0 / 0	2 / 1 / 0
No Complaint of Brake System Failure or Extended Stopping Distance:				
Pedal-to-the-Floor / Pedal Drop-	1 / 0 / 0	0 / 0 / 0	0 / 0 / 0	0 / 0 / 0
Brake Pedal Feel-	6 / 0 / 0	0 / 0 / 0	0 / 0 / 0	0 / 0 / 0
Brake Noise-	1 / 0 / 0	0 / 0 / 0	0 / 0 / 0	0 / 0 / 0
Pedal-to-the-Floor / Pedal Drop w / ABS Lamp "On"-	1 / 0 / 0	0 / 0 / 0	0 / 0 / 0	0 / 0 / 0
Brake Pedal Feel w / ABS Lamp "On"-	1 / 0 / 0	0 / 0 / 0	0 / 0 / 0	0 / 0 / 0
Total- (SYMPTOM # 2 in FAILURE REPORT SUMMARY)	10 / 0 / 0	0 / 0 / 0	0 / 0 / 0	0 / 0 / 0
ABS Lamp "On" Only- (SYMPTOM #3 in FAILURE REPORT SUMMARY)	134 / 0 / 0	0 / 0 / 0	0 / 0 / 0	0 / 0 / 0

* Numbers in Table indicate - the number of complaints, etc. received/the number of reported crashes/the number of reported injuries

As shown in the above table, about one-half of vehicle owners/drivers reported that particular road surface conditions preceded most or all of the "extended stopping distance" incidents. In about 47% of these "extended stopping distance" incident reports, a bump, bumpy or rough road, or pothole was mentioned as having precipitated one or more "extended stopping distance" incidents. In about 7%, a wet road condition was indicated as being present during one or more of the "extended stopping distance" incidents reported. By far the most frequently mentioned specific factor in the "bump, bumpy or rough road, or pothole" related incidents is a single bump. Owners/drivers reported a complete, or near complete loss of brakes or braking action of from 1 or 2 seconds to more than 8 seconds after hitting a bump while performing a light to moderate brake application. In most of the incidents reported, the driver was making a routine brake application to slow for traffic ahead, to stop for a traffic signal or stop sign, or to slow when entering a curve, side street, parking lot or parking space. The amount by which drivers estimated their stopping distance was increased by these periods of brake loss, ranged from several feet or a car length to more than 100 feet. Of course, these estimates are very much influenced by the speed at which the vehicle was traveling when the incident occurred. Most incidents were reported to have occurred at low to moderate speeds, less than 35 mph.

The owner complaints and field reports submitted by Isuzu mention several incidents in which extended stopping distance or periods of several seconds of loss of braking were reported in vehicles in which it was later reported that either wheel speed sensors were missing or were found to have been damaged or defective. In at least two of these cases, the extended stopping distance or period of loss of braking was described as having resulted from ABS activation or as having been accompanied by noises or brake pedal responses that were believed to be typical of an ABS activation. One of these reported a 3 to 5 second loss of brakes at 50 mph while braking in a turn.

In a related matter, in two of the Attachment 6 documents submitted to ODI on February 26, 1999, mention is made of "4 high speed braking in a turn" tests; however, copies of the report documenting these tests or copies of the results of these tests were not provided to ODI in the responses to the PE-IR. Also, one of the Attachment 6 documents states that one of the consequences of the software change to the wheel speed compensation algorithm made as part of the previously mentioned Service Campaign was that "the more stringent limits will also improve the high speed light braking in a turn ISZA noticed."

In one owner complaint, it is stated that Isuzu's "Techline", in response to a question related to an owner complaint, stated "during low speed (sharp) turns the speed differential between wheels can be interpreted as a need for the ABS to activate and it may feel like the regular brakes aren't working." It is noted that several low speed crashes and reported "near crashes" involved driver's turning sharply into parking spaces at low speeds.

Interviews with owners related to the effect on brake system performance of the Service Campaign being performed revealed that several owners no longer experienced problems subsequent to the repair, one owner indicated that problems were only experienced after the repair, and most owners indicated little or no effect, i.e., problems occurred prior to the repair and continued after the repair.

Based on the information currently available to ODI, further investigation is warranted.

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MAY 13 1999

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Akira Nogami, Chief Representative
Emissions and Safety
Isuzu Motors America, Inc.
46401 Commerce Center Drive
Plymouth, MI 48170-2473

NSA-121sgs
EA99-008

Dear Mr. Nogami:

The Office of Defects Investigation (ODI) of the National Highway Traffic Safety Administration (NHTSA) has reviewed the information Isuzu Motors America, Inc. submitted in response to ODI's September 24, 1998 Information Request issued as part of its Preliminary Evaluation (PE98-051) of alleged degradation in braking performance on certain 1998 Isuzu Rodeo and Honda Passport vehicles. As a result of this review, the Preliminary Evaluation has been upgraded to an Engineering Analysis (EA99-008). With this action ODI is expanding the subject vehicle population to include all 1998 through 1999 Isuzu Rodeo and Honda Passport vehicles, and all 1998 through 1999 Isuzu Amigo vehicles equipped with a four-wheel anti-lock brake system. As part of the investigation, this letter requests additional information from Isuzu.

Since our previous Information Request, this office has received 35 additional reports that allege braking performance problems in the subject vehicles (30 for 1998 Isuzu Rodeos and Honda Passports, two for a 1999 Isuzu Rodeo, and three for 1998 Isuzu Amigos). Seven of these reports (six for 1998 Isuzu Rodeos and Honda Passports, and one for a 1999 Isuzu Rodeo) were received, or came to the attention of ODI, since the opening of EA99-008. A copy of each of the reports is enclosed for your information.

Unless otherwise stated in the text, the following definitions apply to this Information Request:

- **Subject vehicles**: all 1998 through 1999 model Isuzu Rodeo and Honda Passport vehicles, and all 1998 through 1999 model Isuzu Amigo vehicles equipped with a four-wheel anti-lock brake system.

- **Isuzu**: Isuzu Motors America, Inc. and Isuzu Motors Limited and all of their divisions, subsidiaries (whether or not incorporated), and affiliated enterprises, both foreign and domestic, all headquarters, regional, zone, and other offices of Isuzu Motors America, Inc. and Isuzu Motors Limited or any of their divisions, subsidiaries, and affiliated enterprises, all past and present officers and employees of Isuzu Motors America, Inc.

and Isuzu Motors Limited or any of their divisions, subsidiaries, and affiliated enterprises, and all agents, contractors, consultants, attorneys, law firms, and other persons or entities engaged directly or indirectly (for example, as an employee of a consultant) by, or under the control of, Isuzu Motors America, Inc. and Isuzu Motors Limited or any of their divisions, subsidiaries, or affiliated enterprises, who are or, in or after 1997, were involved in any way with any of the following related to the alleged defect in the subject vehicles:
(a) design, engineering, analysis, modification or production (e.g., quality control)
(b) testing, assessment or evaluation;
(c) consideration, or recognition of potential or actual defects, reporting record-keeping, and information management, (e.g., complaints, field reports, warranty information, part sales), analysis, claims, or lawsuits; or
(d) communication to, from or available to zone representatives, fleets, dealers, or other field locations, including but not limited to persons who have the capacity to obtain information from dealers.

- **Alleged defect**: degraded braking performance characterized by a perceived loss of braking capability on the part of the vehicle operator, including, but not limited to, situations in which vehicle owners or operators describe themselves as having experienced any of the following: extended stopping distance, no braking ability, no brakes, brakes release, loss of brakes, brakes disengage, brakes fail, or brake failure.

- **Foundation brake system**: that portion of brake system that includes the brake rotors, brake calipers and brake friction pads.

- **Campaign service bulletin**: Isuzu's Campaign Service Bulletin SB98-09-L002, 1998 Rodeo (UE) Coil-Integrated Module Replacement.

- **Document:** "Document(s)" is used in the broadest sense of the word and shall mean all original written, printed, typed, recorded, or graphic matter whatsoever, however produced or reproduced, of every kind, nature, and description, and all nonidentical copies of both sides thereof, including, but not limited to, papers, letters, memoranda, correspondence, communications, electronic mail (e-mail) messages (existing in hard copy and/or in electronic storage), faxes, mailgrams, telegrams, cables, telex messages, notes, annotations, working papers, drafts, minutes, records, audio and video recordings, data, databases, other information bases, summaries, charts, tables, graphics, other visual displays, photographs, statements, interviews, opinions, reports, newspaper articles, studies, analyses, evaluations, interpretations, contracts, agreements, jottings, agendas, bulletins, notices, announcements, instructions, blueprints, drawings, as-builts, changes, manuals, publications, work schedules, journals, statistical data, desk, portable and computer calendars, appointment books, diaries, travel reports, lists, tabulations, computer printouts, data processing program libraries, data processing inputs and outputs, microfilms, microfiches, statements for services, resolutions, financial

statements, governmental records, business records, personnel records, work orders, pleadings, discovery in any form, affidavits, motions, responses to discovery, all transcripts, administrative filings and all mechanical, magnetic, photographic and electronic records or recordings of any kind, including any storage media associated with computers, including, but not limited to, information on hard drives, floppy disks, backup tapes, and zip drives, electronic communications, including but not limited to, the Internet and shall include any drafts or revisions pertaining to any of the foregoing, all other things similar to any of the foregoing, however denominated by Isuzu, any other data compilations from which information can be obtained, translated if necessary, into a usable form and any other documents. For purposes of this request, any document which contains any note, comment, addition, deletion, insertion, annotation, or otherwise comprises a nonidentical copy of another document shall be treated as a separate document subject to production. In all cases where original and any non-identical copies are not available, "document(s)" also means any identical copies of the original and all non-identical copies thereof. Any document, record, graph, chart, film or photograph originally produced in color must be provided in color. Furnish all documents whether or not verified by Isuzu. If a document is not in the English language, provide both the original document and an English translation of the document.

In order for my staff to evaluate the alleged defect, certain information is required. Pursuant to 49 U.S.C. § 30166, please provide numbered responses to the following requests. Please repeat the applicable request verbatim above each response. After Isuzu's response to each request, identify the source of the information, and indicate the last date the source updated the information prior to the preparation of the response. Insofar as Isuzu has previously provided a document to ODI, Isuzu may **either** produce it again, or identify the document, the document submission to ODI in which it was included and the precise location in that submission where the document is located. Previously submitted complaints and field reports [in PE98-051] do not need to be provided. When documents are produced, the documents shall be produced in an identified, organized manner that corresponds with the Information Request letter (including the subparts). When documents are produced and the documents would not, standing alone, be self-explanatory, the production of documents shall be supplemented and accompanied by explanation.

PLEASE NOTE that your response of December 3, 1998 improperly failed to include copies of documents, such as noted in Request No. 3 below. This is unacceptable and may subject Isuzu to penalties.

If Isuzu cannot respond to any specific request or subpart thereof, please state the reason why it is unable to do so. If Isuzu claims that any document or other information or material responsive to any of the following items need not be provided to NHTSA because it is privileged or the work product of an attorney, separately by request number, for each document or other information or material state the nature of that information or material and identify any document in which it is found by date, subject or title, name and position of the person from, and the person to, whom it was sent, and the name and position of any other recipient. Isuzu must also describe the basis for

the claim, and explain why Isuzu believes it applies.

1. State the total number of subject vehicles sold in the United States.

2. Separately identify and state the number of each vehicle make, model, and model year of any vehicles, other than the subject vehicles, manufactured by Isuzu and sold in the United States with:
   a. the same foundation brake system as that on the subject vehicles;
   b. the same anti-lock brake system as that on the subject vehicles.

3. In your December 3, 1998 response to Request 3-c of ODI's Information Request for PE98-051 dated September 24, 1998 (the "PEIR"), several of the "A.I.M.I. Customer Relations Tracking System - Daily Activity Reports" that were submitted include references to various documents, such as "FSER reports," "ZSPM reports," " ZSPM inspections," accident reports, and other reports and photographs, that were received by or that were to be submitted to Isuzu. Copies of these documents were not included in your response, as was required. Please review your December 3, 1998 response and produce copies of these and all other documents not previously submitted that are referenced in that response.

4. In your February 26, 1999 supplemental response to Request 7 of the PEIR, Items No. 1, 3, and 4 in Attachment 6-3 (listed as Document No. 5 of Attachment 6) makes reference to documents that were not produced with the response. Each of these items specifically make reference to a report and/or a description. Please review these reports and the description, and produce copies of any that bear any possible relevance to the alleged defect or to any of the braking performance characteristics described in any of the vehicle owner's questionnaires, owner/fleet complaints, field reports, or other reports of braking system performance problems of which Isuzu is aware, together with all related documents.

5. Update your response to Request 3 of the PEIR, by providing all information and producing copies of all documents received by Isuzu, or of which Isuzu has otherwise become aware, that have not previously been submitted to ODI relating to any of the following identified in and/or submitted with your December 3, 1998 response to the PEIR:

   a. owner/fleet complaints,
   b. field reports,
   c. crash/incident reports,
   d. subrogation claims,
   e. lawsuits, and
   f. third-party arbitration proceedings (where Isuzu is a party to the arbitration)

   Please list and collate your response for each category ("a" through "f") by date of the complaint, report, claim, lawsuit or proceeding. Please provide for each item in this response the incident date, mileage of the vehicle at time of incident (if known), approximate age of

vehicle or model year, disposition of the complaint, claim, or other matter involved, and, where a fleet vehicle is involved, the name of the fleet, and the name and telephone number of a contact person at that fleet. For items "a" through "d," please provide all related information and reports whether or not Isuzu has verified each one. For items "e" and "f," summaries are acceptable. Please identify in the summary the caption, court, docket number, and filing date of each lawsuit if a copy of the complaint initiating the lawsuit is not provided

6. State the number and provide copies of all the following received by Isuzu, or of which Isuzu has otherwise become aware, that relate, or could relate to the alleged defect in the subject vehicles and that Isuzu did not submit to ODI in its December 3, 1998 response to the PEIR:

   a. owner/fleet complaints;
   b. field reports;
   c. crash/incident reports;
   d. subrogation claims;
   e. lawsuits; and
   f. third-party arbitration proceedings (where Isuzu is a party to the arbitration)

   Please list and collate your response for each category ("a" through "f") by date of the complaint, report, claim, lawsuit or proceeding. Please provide for each item in this response the incident date, mileage of vehicle at time of incident (if known), approximate age of vehicle or model year, disposition of the complaint, claim, or other matter, and, where a fleet vehicle is involved, the name of the fleet, and the name and telephone number of a contact person at that fleet. For items "a" through "d," please provide all related information and reports whether or not Isuzu has verified each one. For items "e" and "f," summaries are acceptable. Please identify in the summary the caption, court, docket number, and filing date of each lawsuit if a copy of the complaint initiating the lawsuit is not provided.

7. Provide an updated response to Request 4 of the PEIR that includes copies of all service or technical bulletins, advisories, or other communications to dealers, zone offices, or field offices pertaining to the alleged defect in the subject vehicles that were not provided in response to that request or were issued after Isuzu ceased collecting information used in formulating that response. If no such documents have been issued, so state.

8. Provide an updated response to Request 5 of the PEIR that includes new or additional warranty claims, including extended warranty claims, and requests for "goodwill," field, or zone adjustments received by Isuzu, or of which Isuzu has otherwise become aware, that relate or may relate to the alleged defect in the subject vehicles and that were not submitted in response to the PEIR or were received after Isuzu ceased collecting information used in formulating that response. If no such claims or requests have been received, so state.

9. Provide an updated response to Request 6 of the PEIR that includes any study, survey, or investigation that is known to Isuzu that relates or may relate to the alleged defect in the

subject vehicles and that Isuzu did not submit to ODI in response to the PEIR, or that were

completed after Isuzu ceased collecting information used in formulating that response. If no such study, survey, or investigation was undertaken or completed, so state.

10. Provide an updated response to Request 9 of the PEIR that identifies and describes all significant modifications or changes made by or on behalf of Isuzu in the manufacture, design, or material composition of the foundation brake systems and/or anti-lock brake system used in the subject vehicles from the start of production of the subject vehicles to date that relate, or could relate to the alleged defect and that Isuzu did not identify in response to the PEIR. The following information must be included for each such modification or change:

    a. the date, or approximate date on which the modification or change was incorporated into production;
    b. a description of the modification or change;
    c. the reason for the modification or change;
    d. the part number of the modified or changed component ;
    e. whether components produced before the modification or change were withdrawn from sale inventory, and if so, the date when they were withdrawn; and;
    f. whether the modified or changed components can be interchanged with earlier production components.

11. For each of the following items included in Attachment 2 to your December 3, 1998 response to the PEIR, provide any additional information regarding the incident or incidents described that is known to Isuzu, Isuzu's assessment of the nature and cause of the braking system performance/problems described in the items, a description of any repairs that were performed on the vehicle involved (including identification of any parts that were replaced), and the reason/rationale for the repairs, if any, that were performed:

    a. the "Daily Activity Report"case no. 97336153 (for vehicle with VIN 4S2CM58W4W4311802) in the "owner/fleet complaints - Isuzu Rodeo" portion of Attachment 2;
    b. the "Spool Report" record no. N011998-08-1900046 (for vehicle with VIN 4S6CK58W5W4408589) in the "owner/fleet complaints - Honda Passport" portion of Attachment 2;
    c. the "Spool Report" record no. A031998-04-1600005 (for vehicle with VIN 4S6CK58W4W4407272) in the "owner/fleet complaints - Honda Passport" portion of Attachment 2;
    d. the "Tech Line Contact Report" T/L Ref #614766 (for vehicle with VIN 4S6CK58W5W4405675) in the "owner/fleet complaints - Honda Passport" portion of Attachment 2; and
    e. the "FER-Field Engineering Report" report no. 97-151-WTD (for vehicle with VIN 9W4309842) in the "field reports - Isuzu Rodeo" portion of Attachment 2.

12. On the third page of Attachment 6, Document No. 4 included with your February 26, 1999 response to the PEIR, there appears (as the last item in the "Addition actions due after 10/28" section under the heading "Topic 1: Code 38 in Current S/W") a reference to "a description of 4 high speed braking in a turn traces" that a Kelsey Hayes employee was to provide Isuzu. Item No. 8 on the first page of Attachment 6-3 (listed as Document No. 5 in Attachment 6) indicates that this information was furnished to Mr. Tamai of Isuzu. Provide copies of these "traces," and all documents related to the test program/project during which these "traces" were generated, including the results of all other tests performed as part of that test program/project, and all results, conclusions and recommendations that related to these tests. Describe the reasons why these tests were performed. Provide Isuzu's assessment of the possible relationship between the results of these tests and the "braking in a turn" performance complaints contained in:

    a. the "Spool Report" record no. N011998-08-1900046 (for vehicle with VIN 4S6CK58W5W4408589) in the "owner/fleet complaints - Honda Passport" portion of Attachment 2 to your December 3, 1998 response to the PEIR, and
    b. the "Tech Line Contact Report" T/L Ref #614766 (for vehicle with VIN 4S6CK58W5W4405675) in the "owner/fleet complaints - Honda Passport" portion of Attachment 2 to your December 3, 1998 response to the PEIR.

13. On the third page of Attachment 6, Document No. 4 included with your February 26, 1999 response to the PEIR there appears (as the sixth item in the "Other code 38 notes" section under the heading "Topic 1: Code 38 in Current S/W") a statement that "the new more stringent limits (incorporated in the new 'w/s compensation' logic) will also improve the high speed light braking in a turn ISZA [Isuzu Motors America, Inc.] noticed." Describe what "ISZA noticed." Explain why it was concluded that "the new more stringent limits" would improve high speed light braking in a turn. Provide all information that formed the basis for this conclusion, including copies of all documents in which that information is found. Produce copies of all other documents discussing the effect of the change on high speed braking in a turn. In light of the information contained in any of the documents provided in response to this request, and any other relevant information of which Isuzu is otherwise aware, provide Isuzu's assessment of the "braking in a turn" performance complaints contained in:

    a. the "Spool Report" record no. N011998-08-1900046 (for vehicle with VIN 4S6CK58W5W4408589) in the "owner/fleet complaints - Honda Passport" portion of Attachment 2 to your December 3, 1998 response to the PEIR, and
    b. the "Tech Line Contact Report" T/L Ref #614766 (for vehicle with VIN 4S6CK58W5W4405675) in the "owner/fleet complaints - Honda Passport" portion of Attachment 2 to your December 3, 1998 response to the PEIR.

14. Furnish Isuzu's assessment of the alleged defect in the subject vehicles, including:

    a. all causal or contributory factors;
    b. the failure mode;
    c. the risk to motor vehicle safety that it poses,
    d. whether there are any circumstances that would provide vehicle operators or others with warning of its existence; and
    e. any possible relationship between the alleged defect and the campaign service bulletin.

This letter is being sent to Isuzu pursuant to 49 U.S.C. § 30166, which authorizes NHTSA to conduct any investigation that may be necessary to enforce Chapter 301 of Title 49 and to make reports to NHTSA. Isuzu's failure to respond promptly and fully to this letter could subject Isuzu to civil penalties pursuant to 49 U.S.C. § 30165 or lead to an action for injunctive relief pursuant to 49 U.S.C. § 30163. Other remedies and sanctions are available as well.

Isuzu's response to this letter, in duplicate, must be submitted to this office by July 8, 1999. Please include in Isuzu's response the identification codes referenced on page one of this letter. If Isuzu finds that it is unable to provide all of the information requested within the time allotted, Isuzu must request an extension from Richard Boyd at (202) 366-4933, no later than five business days before the response due date. If Isuzu is unable to provide all of the information requested by the original deadline, it must submit a partial response by the original deadline with whatever information Isuzu then has available, even if Isuzu has received an extension.

If Isuzu considers any portion of its response to be confidential information, 49 CFR Part 512, "Confidential Business Information," requires that Isuzu submit two copies of those document(s) containing allegedly confidential information (except only one copy of blueprints) and one copy of the documents from which information claimed to be confidential has been deleted, to the Office of Chief Counsel, National Highway Traffic Safety Administration, Room 5219 (NCC-30), 400 Seventh Street, SW, Washington, D.C. 20590. In addition, Isuzu must provide supporting information for the request for confidential treatment in accordance with section 512.4(b) and (e) and include the name, address, and telephone number of a representative to receive a response from the Chief Counsel.

Form Approved: O.M.B. No. 2127-0008

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

Auto Safety Hotline

Vehicle Owner's Questionnaire

NATIONWIDE 1-800-424-9393
DC METRO AREA (202) 366-0123
INTERNET: http://www.nhtsa.dot.gov

FOR AGENCY USE ONLY 246

Date Received: 8 Sep 1998

Od_or
rt_dt
od_rt
up_ltr

Reference No. 827702

OWNER INFORMATION (Type or Print)

[redacted]

Work Number

Home Number

Do you authorize NHTSA to provide a copy of this report to the manufacturer of your vehicle? ☐ *YES* ☐ *NO*
In the absence of an authorization, NHTSA WILL NOT provide your name and address to the vehicle manufacturer.

Signature of Owner _____ Date __/__/__

VEHICLE INFORMATION

Vehicle Ident. No. (VIN) (Located at bottom of windshield on driver's side)	Vehicle Make	Vehicle Model	Vehicle Year	Current Odometer Reading
4S2CK58W6W4309585	ISUZU TRUCK	RODEO	1998	

Purchase Date: ☒ New ☐ Used

Dealer's Name _____ City _____ State _____ Zip Code _____

Engine Size (CID/CC/L) _____ No Cylinders _____ ☐ Turbo ☐ Diesel ☐ Gas ☐ Fuel Injection

Transmission Type: ☐ Manual ☐ Automatic

Antilock Brakes: ☒ Yes ☐ No

Restraint System: ☐ Driverside Airbag ☐ Motorbelt ☐ Passengerside Airbag ☐ 2-Point Belt ☒ 3-Point Belt

Cruise Control: ☐ Yes ☒ No

DriveTrain: ☐ Front ☐ Rear ☐ 4-Wheel

Vehicle Type: ☐ Car ☐ Sports Ut. ☐ Van ☐ Truck ☐ Minivan ☐ Motorcycle ☐ Other _____

Body Style: ☐ 2-Door ☐ 4-Door ☐ Stationwagon ☐ Pick Up Truck ☒ Other _____

FAILED COMPONENT(S)/PART(S) INFORMATION

Component: 03250000

Part Name(s): BRAKES:HYDRAULIC:ANTI-SKID SYSTEM

Location: ☐ Left ☐ Right ☐ Front ☐ Rear

Failed Part(s): ☐ Original ☐ Replacement

No of Failures: 0

Date(s) of Failure(s): 08-SEP-98
Mileage at Failure(s): 20000
Vehicle Speed at failure(s): _____

Failed Part(s) Available? ☐ Yes ☐ No

NHTSA Previously Contacted? ☐ Yes ☐ No

APPLICABLE INCIDENT INFORMATION

(Please describe in detail the incident(s), Failure(s), Crash(es), and injury(ies) on the back of this form)

Crash	Fire	Number of Persons Injured	Number of Fatalities	Estimated Property Damage	Reported to Police
☐ Yes ☒ No	☐ Yes ☒ No	0	0	0	☐ Yes ☒ No

NARRATIVE DESCRIPTION OF FAILURE(S),INCIDENT(S),INJURY(IES)

WHEN CONSUMER IS DRIVING AND STEPS ON BRAKES, THE ANT-LOCK BRAKES JUST LOCK UP. *AK

CONTINUE ON BACK IF NEEDED

The Privacy Act of 1974-Public Law 93-579 *This information is requested pursuant to authority vested in the National Highway Traffic Safety Act and subsequent amendments. You are under no obligation to respond to this questionnaire. Your response may be used to assist the NHTSA in determining whether a manufacturer should take appropriate action to correct a safety defect. If the NHTSA proceeds with administrative enforcement or litigation against a manufacturer, your response, or a statistical summary thereof, may be used in support of the agency's action.*

HS-Form 350 (Rev. 3/97)

00000015

From: [redacted]
To: Thomas, Deborah <NHTSA>, Young, Beverly <NHTSA>, J...
Date: Tue, Sep 22, 1998 12:53 PM
Subject: WWW VOQ Submission

VEHICLE OWNER'S QUESTIONAIRE

541580

Submission Time: September 22, 1998 12:53:27PM

OWNER INFORMATION

NA[redacted]
ADD[redacted]
Apart[redacted]

TELE[redacted]
EM[redacted]

Have NHTSA send signature card for authorization: Yes

VEHICLE INFORMATION

VIN: 4S6CM58W407775
MAKE: Honda
MODEL: Passport
YEAR: 1998

ODOMETER: 8266
PURCHASE DATE: 01/16/98
NEW OR USED: New

DEALER NAME: Honda City
ADDRESS: Liverpool, NY

ENGINE SIZE:
CYLINDERS:

FUEL INJECTION: on
TURBO:
FUEL TYPE: Gas
ANTILOCK BRAKES: Yes
CRUISE CONTROL: Yes
DRIVETRAIN: 4 Wheel
DRIVER AIRBAG: on
PASSENGER AIRBAG: on
3-POINT BELT: on
MOTOR BELT:
2-POINT BELT:
BODY STYLE: Other

00000016

FAILED COMPONENT(S)/PART(S) INFORMATION

COMPONENT: BRAKING SYSTEM

PART NAME(S): Brakes / ABS

LOCATION:

NUMBER OF FAILURES: 3

DATE(S) OF FAILURES: 9/16 (2 occurrences); 9/17 (1 occurrence)

MILEAGE AT FAILURE(S): 8200

SPEED AT FAILURE(S) 50, 35, 40

MANUFACTURER CONTACTED: Yes

NHTSA CONTACTED: No

APPLICABLE ACCIDENT INFORMATION

ACCIDENT: No
FIRE: No

DRIVER SIDE AIRBAG DEPLOYED: NA
PASSENGER SIDE AIRBAG DEPLOYED: NA

NUMBER OF PERSONS INJURED: 0
NUMBER OF FATALITIES: 0
ESTIMATED PROPERTY DAMAGE: 0

REPORTED TO POLICE: No

INFORMATION ON TIRE FAILURE(S) (IF APPLICABLE)

DOT NUMBER:
TIRE MANUFACTURER:
TIRE NAME:
TIRE SIZE:

ADDITIONAL COMMENTS

Occurrence 1 - Braking at 50mph on "damp" road condition; normal application of brakes stopping for a traffic light; brake pedal went to floor, ABS clicking loudly, caused extended stopping distance almost into intersection
Occurrence 2 - Same day, 10 mins later; 35mph stopping to turn into parking lot; same problem causing extended stopping distance

Occurrence 3 - Next day, approx. 40mph, dry road conditions, stopping for traffic light; normal application of brakes; with foot on brakes, hit bump and pedal went to floor, ABS began clicking, caused extended stopping distance

ALL SITUATIONS CAUSED A LONGER THEN EXPECTED STOPPING DISTANCE AND THE FEELING THAT BRAKES HAD FAILED...VEHICLE WAS JUST CONTINUING IN A FORWARD MOTION.

0000016

From: [redacted]
To: Thomas, Deborah <NHTSA>, Young, Beverly <NHTSA>, J...
Date: Fri, Sep 25, 1998 10:27 AM
Subject: WWW VOQ Submission

541687

VEHICLE OWNER'S QUESTIONAIRE
==========

Submission Time: September 25, 1998 10:26:38AM

OWNER INFORMATION

N[redacted]
AD[redacted]
Apa[redacted]

TEL[redacted]
E[redacted]

Have NHTSA send signature card for authorization: Yes

VEHICLE INFORMATION

VIN: 4S2CM58W2W4315654
MAKE: Isuzu
MODEL: Rodeo
YEAR: 1998

ODOMETER: 6788
PURCHASE DATE: 12/15/97
NEW OR USED: New

DEALER NAME: Adzam Auto Sales
ADDRESS: Bedford Hills, NY 10507

ENGINE SIZE: 3.2L
CYLINDERS: 6

FUEL INJECTION: on
TURBO:
FUEL TYPE:
ANTILOCK BRAKES: Yes
CRUISE CONTROL: Yes
DRIVETRAIN: 4 Wheel
DRIVER AIRBAG: on
PASSENGER AIRBAG: on
3-POINT BELT: on
MOTOR BELT:
2-POINT BELT:
BODY STYLE: Other

00000019

FAILED COMPONENT(S)/PART(S) INFORMATION

COMPONENT: Brakes

PART NAME(S): ABS/Brake System, when hitting a bump and applying the brakes, you loose the brake system entirely until you reapply the brakes!!

LOCATION:

NUMBER OF FAILURES: At least 20

DATE(S) OF FAILURES: Frequent

MILEAGE AT FAILURE(S): Various

SPEED AT FAILURE(S) Between 5 and 30 MPH

MANUFACTURER CONTACTED: Yes

NHTSA CONTACTED: No

APPLICABLE ACCIDENT INFORMATION

ACCIDENT: No
FIRE: No

DRIVER SIDE AIRBAG DEPLOYED: No
PASSENGER SIDE AIRBAG DEPLOYED: No

NUMBER OF PERSONS INJURED: 0
NUMBER OF FATALITIES: 0
ESTIMATED PROPERTY DAMAGE: 0

REPORTED TO POLICE: No

INFORMATION ON TIRE FAILURE(S) (IF APPLICABLE)

DOT NUMBER:
TIRE MANUFACTURER:
TIRE NAME:
TIRE SIZE:

ADDITIONAL COMMENTS

From: [redacted]
To: Thomas, Deborah <NHTSA>, Young, Beverly <NHTSA>, J...
Date: Fri, Sep 25, 1998 1:50 PM
Subject: WWW VOQ Submission

541698

VEHICLE OWNER'S QUESTIONAIRE

Submission Time: September 25, 1998 01:50:32PM

OWNER INFORMATION

[redacted]

Have NHTSA send signature card for authorization: Yes

VEHICLE INFORMATION

VIN:
MAKE: Isuzu
MODEL: Rodeo
YEAR: 1998

ODOMETER: 2498
PURCHASE DATE: 07/18/98
NEW OR USED: New

DEALER NAME: Superior Red McCombs Isuzu
ADDRESS: San Antonio, TX

ENGINE SIZE: 3.2L
CYLINDERS: 6

FUEL INJECTION: on
TURBO:
FUEL TYPE: Gas
ANTILOCK BRAKES: Yes
CRUISE CONTROL: Yes
DRIVETRAIN: Rear
DRIVER AIRBAG: on
PASSENGER AIRBAG: on
3-POINT BELT: on
MOTOR BELT:
2-POINT BELT: on
BODY STYLE: 4-Door

00000021

FAILED COMPONENT(S)/PART(S) INFORMATION

COMPONENT: Brakes

PART NAME(S): I applied brakes when I hit a sudden bump in the road, I was driving very slowly on all occasions of the incident. The brakes just seemed to disappear! The pedal made a trrrrickkk and clicking sound and the brakes just would not work, until I took my foot off the pedal and re applied them. Since I was at only 5-10mph, I traveled only a few feet before the truck came to a halt, however, it was very unnerving and scary. Don't know the VIN number of my truck, I'll get it and turn it in later... Just gave it in to the local dealer for work and he says that maybe the ABS is engaging too early... I'll get it back this evening.

LOCATION: Left

NUMBER OF FAILURES: 4, not any particular side, ignore 'location' answer, all brakes

DATE(S) OF FAILURES:

MILEAGE AT FAILURE(S): 300, 1000, 1500, 2000

SPEED AT FAILURE(S) 5-10mph

MANUFACTURER CONTACTED: No

NHTSA CONTACTED: No

APPLICABLE ACCIDENT INFORMATION

ACCIDENT: No
FIRE: No

DRIVER SIDE AIRBAG DEPLOYED: No
PASSENGER SIDE AIRBAG DEPLOYED: No

NUMBER OF PERSONS INJURED: 0
NUMBER OF FATALITIES: 0
ESTIMATED PROPERTY DAMAGE: 0

REPORTED TO POLICE: No

INFORMATION ON TIRE FAILURE(S) (IF APPLICABLE)

DOT NUMBER:
TIRE MANUFACTURER:
TIRE NAME:
TIRE SIZE:

ADDITIONAL COMMENTS

From: [redacted]
To: Thomas, Deborah <NHTSA>, Young, Beverly <NHTSA>, J...
Date: Sun, Sep 27, 1998 10:48 AM
Subject: WWW VOQ Submission

541727

VEHICLE OWNER'S QUESTIONAIRE
==========

Submission Time: September 27, 1998 10:48:53AM

OWNER INFORMATION

NA[redacted]
ADD
Apar

TELE
EM

Have NHTSA send signature card for authorization: Yes

VEHICLE INFORMATION

VIN: 4S2CM58W1W4311403
MAKE: ISUZU
MODEL: RODEO
YEAR: 1998

ODOMETER: 13600
PURCHASE DATE: 11/17/97
NEW OR USED: New

DEALER NAME: Collins Olds Isuzu
ADDRESS: Indianapolis, IN 46254

ENGINE SIZE: 3.2 L
CYLINDERS: 6

FUEL INJECTION: on
TURBO:
FUEL TYPE:
ANTILOCK BRAKES: Yes
CRUISE CONTROL: Yes
DRIVETRAIN: 4 Wheel
DRIVER AIRBAG: on
PASSENGER AIRBAG: on
3-POINT BELT: on
MOTOR BELT:
2-POINT BELT:
BODY STYLE: Other

00000023

FAILED COMPONENT(S)/PART(S) INFORMATION

COMPONENT: Brakes

PART NAME(S):

LOCATION:

NUMBER OF FAILURES: 3

DATE(S) OF FAILURES: 5/20/98, 9/4/98, 9/7/98

MILEAGE AT FAILURE(S): 7520, 12,280, 12,345

SPEED AT FAILURE(S) 10-20 mph

MANUFACTURER CONTACTED: No

NHTSA CONTACTED: No

APPLICABLE ACCIDENT INFORMATION

ACCIDENT: No
FIRE: No

DRIVER SIDE AIRBAG DEPLOYED: No
PASSENGER SIDE AIRBAG DEPLOYED: No

NUMBER OF PERSONS INJURED: na
NUMBER OF FATALITIES: na
ESTIMATED PROPERTY DAMAGE: na

REPORTED TO POLICE: No

INFORMATION ON TIRE FAILURE(S) (IF APPLICABLE)

DOT NUMBER:
TIRE MANUFACTURER:
TIRE NAME:
TIRE SIZE:

ADDITIONAL COMMENTS

5/20/98- braking as I was going over a speed bump, brakes seemed to release as the front wheels hit the speed bump.
9/4/98 & 9/7/98- braking on a steep incline (down), wash board, dirt/gravel road,brakes didn't hold, seemed to release everytime the wheels hit a rut/bump. It didn't appear that the ABS was pulsing to try and keep the wheels from locking up.

00000021

From:
To: Thomas, Deborah <NHTSA>, Young, Beverly <NHTSA>, J...
Date: Mon, Sep 28, 1998 12:12 PM
Subject: WWW VOQ Submission

541748

VEHICLE OWNER'S QUESTIONAIRE
==========

Submission Time: September 28, 1998 12:12:55PM

OWNER INFORMATION

NAME
ADDRE:
Apartmr

TELEPHO
EMAIL:

Have NHTSA send signature card for authorization: No

VEHICLE INFORMATION

VIN:
MAKE: ISUZU
MODEL: RODEO
YEAR: 1998

ODOMETER: 2700
PURCHASE DATE: mm/dd/yy
NEW OR USED: New

DEALER NAME: FAIR HUNDAI/ISUZU
ADDRESS: DANBURY, CT

ENGINE SIZE: 6CC
CYLINDERS: 6

FUEL INJECTION: on
TURBO:
FUEL TYPE: Gas
ANTILOCK BRAKES: Yes
CRUISE CONTROL: Yes
DRIVETRAIN: 4 Wheel
DRIVER AIRBAG: on
PASSENGER AIRBAG: on
3-POINT BELT: on
MOTOR BELT:
2-POINT BELT:
BODY STYLE: 4-Door

00000025

FAILED COMPONENT(S)/PART(S) INFORMATION

COMPONENT: bRAKES

PART NAME(S): ABS BRAKES STOPPED WORKING WHEN I HIT A BUMP WHILE THE BRAKE PAD WAS DEPRESSED

LOCATION: Front

NUMBER OF FAILURES: TWO (SO FAR)

DATE(S) OF FAILURES: 8/98;9/98

MILEAGE AT FAILURE(S): 2200

SPEED AT FAILURE(S) 10MPH

MANUFACTURER CONTACTED: No

NHTSA CONTACTED: No

APPLICABLE ACCIDENT INFORMATION

ACCIDENT: No
FIRE: No

DRIVER SIDE AIRBAG DEPLOYED: NA
PASSENGER SIDE AIRBAG DEPLOYED: NA

NUMBER OF PERSONS INJURED:
NUMBER OF FATALITIES:
ESTIMATED PROPERTY DAMAGE:

REPORTED TO POLICE:

INFORMATION ON TIRE FAILURE(S) (IF APPLICABLE)

DOT NUMBER:
TIRE MANUFACTURER:
TIRE NAME:
TIRE SIZE:

ADDITIONAL COMMENTS

THERE APPEARS TO BE A PROBLEM WITH THE BRAKING SYSTEM. WHEN I TRY TO BRAKE AND GO OVER A BUMP IN THE ROAD, THE BRAKES SEEM TO DISENGAGE.

POSTED

Form Approved: O.M.B. No. 2127-0008

Copied

US Department of Transportation

National Highway Traffic Safety Administration

AUTO SAFETY HOTLINE

VEHICLE OWNER'S QUESTIONNAIRE

NATIONWIDE 1-800-424-9393
DC METRO AREA 202-366-0123

RECEIVED
98 OCT -5 AM 10:32
OFFICE OF INVESTIGATION

FOR AGENCY USE ONLY

DATE RECEIVED

QC'd

od_or
rt_dt
od_rt
up_ltr

REFERENCE NO.

541824

OWNER INFORMATION (TYPE OR PRINT)

NAME and ADDR[redacted]

DAY TIME TELEPHONE NO. (AREA CODE)

[redacted]

Do you authorize NHTSA to provide a copy of this report to the manufacturer of your vehicle? YES [X] NO [ ]
In the absence of an authorization, NHTSA *WILL NOT* provide your name or address to the vehicle manufacturer.

SIGNATURE OF OWNER | DATE

VEHICLE INFORMATION

VEHICLE IDENTIFICATION NO.*	VEHICLE MAKE	VEHICLE MODEL	MODEL YEAR
4S2CK58W8W4342283	ISUZU	RODEO	1998

*LOCATED AT BOTTOM OF WINDSHIELD ON DRIVER'S SIDE

CURRENT ODOMETER READING: 004014

DATE PURCHASED: 7/98 [X] NEW [ ] USED

DEALER'S NAME, CITY & STATE: CHECKERED FLAG HYUNDAI-ISUZU

ENGINE SIZE (CID/CC/L): —
NO. CYLINDERS: 6
[ ] TURBO [ ] DIESEL [X] GAS [ ] FUEL INJECTN

TRANSMISSION TYPE: [ ] MANUAL [X] AUTOMATIC

ANTILOCK BRAKES: [X] YES [ ] NO

RESTRAINT SYSTEM: [X] DRIVERSIDE AIRBAG [ ] MOTORBELT [X] PASSENGERSIDE AIRBAG [X] 3-POINT BELT [ ] 2-POINT BELT

CRUISE CONTROL: [X] YES [ ] NO

DRIVETRAIN: [ ] FRONT [X] REAR [ ] 4-WHEEL

BODY STYLE: STAWAG ___ 4 DR ✓ 2 DR ___ HATCH BK ___ VAN ___ PK UP TRK ___ OTHER SUV

FAILED COMPONENT(S)/PART(S) INFORMATION (REPORT TIRE INFORMATION ON BACK)

COMPONENT: BRAKES

PART NAME(S): UNK

LOCATION: [ ] LEFT FRONT [ ] RIGHT FRONT [ ] LEFT REAR [ ] RIGHT REAR

FAILED PART(S): [X] ORIGINAL [ ] REPLACEMENT

NO. OF FAILURES: 4

DATE(S) OF FAILURE(S): (4) 98SEP29, (3) 98SEP14, (2) 98AUG30, (1) 98AUG17

MILEAGE AT FAILURE(S): (4) 4011, (3) 3200, (2) UNK, (1) UNK

VEHICLE SPEED AT FAILURE(S):

MANUFACTURER CONTACTED: [X] YES [ ] NO

NHTSA PREVIOUSLY CONTACTED: [ ] YES [X] NO

APPLICABLE ACCIDENT INFORMATION

ACCIDENT	FIRE	NUMBER PERSONS INJURED	NUMBER OF FATALITIES	PROPERTY DAMAGE EST$	POLICE REPORTED
[ ] YES [X] NO	[ ] YES [X] NO	N/A	N/A		[ ] YES [X] NO

NARRATIVE DESCRIPTION OF FAILURE(S), ACCIDENT(S), INJURY(IES)

ON FOUR SEPARATE OCCASIONS, VEHICLE HAS FAILED TO STOP WHEN BRAKES APPLIED. INCIDENTS HAPPENED WHEN SLOWING DOWN FOR STOP LIGHT OR STOP SIGN. ONE OCCASION HAPPENED WHEN PULLING INTO PARKING SPACE AND VEHICLE PROCEEDED OVER SIDEWALK AND STOPPED A FEW INCHES FROM BUILDING. (SEE REVERSE)

CONTINUE ON BACK IF NEEDED

The Privacy Act of 1974
Public Law 93-579
This information is requested pursuant to authority vested in the National Highway Traffic Safety Act and subsequent amendments. You are under no obligation to respond to this questionnaire. Your response may be used to assist the NHTSA in determining whether a manufacturer should take appropriate action to correct a safety defect. If the NHTSA proceeds with administrative enforcement or litigation against a manufacturer, your response, or a statistical summary thereof, may be used in support of the agency's action.

HS-Form 350 (Rev. 5-92)

Fold to show Return Address (no stamp needed) Fasten with tape or staple and mail

INFORMATION ON TIRE FAILURE(S) (IF APPLICABLE)

TIRE IDENTIFICATION NO.*

D	O	T												MANUFACTURER/TIRE NAME	SIZE

* The identification number consists of 7 to 10 letters and numerals following the letters DOT. It is usually located near the rim flange on the side opposite the whitewall or on either side of a blackwall tire.

NARRATIVE DESCRIPTION (CONTINUED)

I NOTIFIED THE DEALER ~~and~~ ON THREE OCCASIONS. THE DEALER REFUSED TO REPLACE ANY BRAKE COMPONENTS CLAIMING THEY COULD DUPLICATED THE BRAKE FAILURE. THE ISUZU REPRESENTATIVE FROM RICHMOND, VA STATED THAT HE KNEW OF FIVE '98 RODEO'S WITH SAME PROBLEM AND HE RECOMMENDED THE BRAKE SYSTEM MIGHT HAVE AIR IN IT. THE DEALER BLEED THE BRAKES, BUT I STILL HAVE THE PROBLEM. CUSTOMER FLAG HUMM - ISUZU REFUSES TO DO ANYTHING ABOUT THE VEHICLE. POINTS OF CONTACT AT DEALER: MARK STEVEN AND R.T. IVES.

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

400 Seventh St., S.W.
Washington, D.C. 20590

Official Business
Penalty for Private Use $300

NO POSTAGE NECESSARY IF MAILED IN THE UNITED STATES

BUSINESS REPLY MAIL
FIRST CLASS PERMIT NO. 73173 WASHINGTON, D.C.

POSTAGE WILL BE PAID BY NATL HWY TRAFFIC SAFETY ADMIN.

U.S. Department of Transportation
National Highway Traffic Safety Administration
Auto Safety Hotline, NEF-11 HL
400 7th Street, SW
Washington, DC 20590

00000025

781398

From: [redacted]
To: Thomas, Deborah <NHTSA>, Young, Beverly <NHTSA>, J...
Date: Mon, Oct 26, 1998 2:59 AM
Subject: WWW VOQ Submission

VEHICLE OWNER'S QUESTIONAIRE
==========

Submission Time: October 26, 1998 02:59:20AM

OWNER INFORMATION

[redacted]

Have NHTSA send signature card for authorization: Yes

VEHICLE INFORMATION

VIN:
MAKE: Isuzu
MODEL: Rodeo
YEAR: 1998

ODOMETER: 19,000
PURCHASE DATE: 12/13/97
NEW OR USED: New

DEALER NAME: Balboa Isuzu
ADDRESS: San Diego, CA 92111

ENGINE SIZE:
CYLINDERS: 6

FUEL INJECTION: on
TURBO:
FUEL TYPE: Gas
ANTILOCK BRAKES: Yes
CRUISE CONTROL: Yes
DRIVETRAIN: Rear
DRIVER AIRBAG: on
PASSENGER AIRBAG: on
3-POINT BELT:
MOTOR BELT:
2-POINT BELT: on
BODY STYLE: 4-Door

00000029

FAILED COMPONENT(S)/PART(S) INFORMATION

COMPONENT: ABS Brake

PART NAME(S):

LOCATION: Front

NUMBER OF FAILURES:

DATE(S) OF FAILURES: Every once in a while

MILEAGE AT FAILURE(S): started at about 3000 miles

SPEED AT FAILURE(S) from 5 mph to 80 mph

MANUFACTURER CONTACTED: Yes

NHTSA CONTACTED: No

APPLICABLE ACCIDENT INFORMATION

ACCIDENT: No
FIRE: No

DRIVER SIDE AIRBAG DEPLOYED: NA
PASSENGER SIDE AIRBAG DEPLOYED: NA

NUMBER OF PERSONS INJURED:
NUMBER OF FATALITIES:
ESTIMATED PROPERTY DAMAGE:

REPORTED TO POLICE:

INFORMATION ON TIRE FAILURE(S) (IF APPLICABLE)

DOT NUMBER:
TIRE MANUFACTURER:
TIRE NAME:
TIRE SIZE:

ADDITIONAL COMMENTS

If I were to not be able to stop on a bumby road in an emergency because I lossed brake control, it could result in a very serious accident and possible death. Which would mean Isuzu could be facing some serious lawsuits, especially if they are charged with ignoring the problem. Something must be done.

Form Approved: O.M.B. No. 2127-0008

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

Auto Safety Hotline

Vehicle Owner's Questionnaire

NATIONWIDE 1-800-424-9393
DC METRO AREA (202) 366-0123
INTERNET: http://www.nhtsa.dot.gov

FOR AGENCY USE ONLY 118

Date Received: 26 Oct 1998

Od_or ___
rt_dt ___
od_rt ___
up_ltr ___

Reference No. 829429

OWNER INFORMATION (Type or Print)

[redacted] 477190

Work Numb[redacted]

Home Numb[redacted]

Do you authorize NHTSA to provide a copy of this report to the manufacturer of your vehicle? ☐ YES ☐ NO
In the absence of an authorization, NHTSA WILL NOT provide your name and address to the vehicle manufacturer.

Signature of Owner _____ Date ___/___/___

VEHICLE INFORMATION

Vehicle Ident. No. (VIN) [Located at bottom of windshield on driver's side]	Vehicle Make	Vehicle Model	Vehicle Year	Current Odometer Reading
4S2CK58W3W4316429	ISUZU TRUCK	RODEO	1998	

Purchase Date: ☐ New ☒ Used

Dealer's Name _____
City _____ State _____ Zip Code _____

Engine Size (CID/CC/L) ____ No Cylinders ____ ☐ Turbo ☐ Diesel ☐ Gas ☐ Fuel Injection

Transmission Type: ☐ Manual ☐ Automatic

Antilock Brakes: ☐ Yes ☒ No

Restraint System: ☐ Driverside Airbag ☐ Motorbelt ☐ Passengerside Airbag ☐ 2-Point Belt ☐ 3-Point Belt

Cruise Control: ☐ Yes ☒ No

DriveTrain: ☐ Front ☐ Rear ☐ 4-Wheel

Vehicle Type: ☐ Car ☐ Sports Ut. ☐ Van ☐ Truck ☐ Minivan ☐ Motorcycle ☐ Other _____

Body Style: ☐ 2 Door ☐ 4 Door ☐ Stationwagon ☐ Pick Up Truck ☐ Other _____

FAILED COMPONENT(S)/PART(S) INFORMATION

Component	Part Name(s)	Location	Failed Part(s)
03250000	BRAKES:HYDRAULIC:ANTI-SKID SYSTEM	☐ Left ☐ Right ☐ Front ☐ Rear	☐ Original ☐ Replacement

No of Failures

Date(s) of Failure(s) 25-OCT-98
Mileage at Failure(s) 20000
Vehicle Speed at failure(s) _____

Failed Part(s) Available? ☐ Yes ☐ No

NHTSA Previously Contacted? ☐ Yes ☐ No

APPLICABLE INCIDENT INFORMATION

(Please describe in detail the incident(s), Failure(s), Crash(es), and injury(ies) on the back of this form)

Crash	Fire	Number of Persons Injured	Number of Fatalities	Estimated Property Damage	Reported to Police
☐ Yes ☒ No	☐ Yes ☒ No				☐ Yes ☒ No

NARRATIVE DESCRIPTION OF FAILURE(S),INCIDENT(S),INJURY(IES)

WHEN DEPESSING THE BRAKE PEDAL, THE VEHICLE DID NOT STOP. THIS HAPPENED WITHOUT WARNING. DRIVER WAS ABLE TO PUT TRUCK IN NEUTRAL, THEN IN PARK WHILE TURNING INTO A PARKING LOT. THERE WAS NO INCLEMENT WEATHER WHEN THIS HAPPENED. THE PROBLEM HAS BEEN REPORTED TO THE MANUFACTURER.

CONTINUE ON BACK IF NEEDED

The Privacy Act of 1974-Public Law 93-579 *This information is requested pursuant to authority vested in the National Highway Traffic Safety Act and subsequent amendments. You are under no obligation to respond to this questionnaire. Your response may be used to assist the NHTSA in determining whether a manufacturer should take appropriate action to correct a safety defect. If the NHTSA proceeds with administrative enforcement or litigation against a manufacturer, your response, or a statistical summary thereof, may be used in support of the agency's action.*

HS-Form 380 (Rev. 3/93)

Vehicle Owner's Questionnaire 700420 submitted 11/8/98 8:16:16 PM

Owner Information

[redacted]

home ph[redacted]

business ph[redacted]

em[redacted]

Have NHTSA send signature card for authorization? Yes

Vehicle Information

vin 4S2CK58W5W4325617

make Isuzu model Rodeo year 1998

odometer 8000

purchase date 04/98 new or used? New body style utility veh

dealer Al Packer Isuzu
1530 North Military Trail
West Palm Beach, FL 33409
561-689-6550

engine size		cylinders	6	fuel injection	N	turbo N	fuel type Gas
antilock brakes	Y	cruise control	Y	drive train	Front		
driver's airbags		passenger's airbags		seat belts			
front	Y	front	Y	3-point	N		
side	N	side	N	2-point	N		
				motorized	N		

Incident(s)

Incident Number 1

failed component / part details

major assembly description: BRAKES: AIR: ANTI-LOCK BRAKE SYSTEM (ABS)

location left/right	location front/rear	original	number of failures	date of failure	mileage at failure	speed at failure	manufacturer contacted	NHTSA contacted
NA	NA	Original	3	11/6/98	8000	10	Y	N

incident details

accident	fire	driver's airbags deployed		passenger's airbags deployed		number of persons injured	number of fatalities	estimated property damage	police report filed
		front	side	front	side				
Y	N	N	N	NA	NA	1	0		Y

Tire Information

DOT number manufacturer

name size

Comments

Since I initially leased this vehicle my car has been in Al Packer Isuzu shop on 3 different occassions for brake problems. On 5/4/98 I brought the vehicle in due to severe brake squeeking and the pedal was hitting the floor. As per my documentation the repair included resurface drums and rotors. On 6-25-98 once again I brought the vehicle in for the brake pedal hitting the floor and the vehicle not stopping correctly. Repair states adjusted rearbrakes. On November 6th I attempted to step on the brake as I was approaching a stop sign and my vehicle did not stop. I rear-ended the vehicle in front of me. This time the brakes made a loud grinding sound, pedal once again went to the floor and I crashed into the vehicle in

front of me. My airbags did not deploy. The loud squeeking sounds have been consistently getting worse. I was also informed the the brake pads had been changed abd "there is nothing we (meaning Al Packer Isuzu) can do about it"

Form Approved: O.M.B. No. 2127-0006

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

Auto Safety Hotline

Vehicle Owner's Questionnaire

NATIONWIDE 1-800-424-9393
DC METRO AREA (202) 366-0123
INTERNET: http://www.nhtsa.dot.gov

FOR AGENCY USE ONLY 125

Date Received: 19 Nov 1998

Od_or ___
rt_dl ___
od_rt ___
up_ltr ___

Reference No. 831076

OWNER INFORMATION (Type or Print)

[redacted] 484747

Work Number [redacted]

Home Number

Do you authorize NHTSA to provide a copy of this report to the manufacturer of your vehicle? ☐ YES ☐ NO
In the absence of an authorization, NHTSA WILL NOT provide your name and address to the vehicle manufacturer.

Signature of Owner _____ Date ___/___/___

VEHICLE INFORMATION

Vehicle Ident. No. (VIN.) (Located at bottom of windshield on driver's side)	Vehicle Make	Vehicle Model	Vehicle Year	Current Odometer Reading
4S2CK58W5W4325617	ISUZU TRUCK	RODEO	1998	

Purchase Date ☐ New ☒ Used

Dealer's Name _____ City _____ State _____ Zip Code _____

Engine Size (CID/CC/L) ___ No Cylinders ___ ☐ Turbo ☐ Diesel ☐ Gas ☐ Fuel Injection

Transmission Type	Antilock Brakes	Restraint System	Cruise Control	Drive Train	Vehicle Type	Body Style
☐ Manual ☐ Automatic	☒ Yes ☐ No	☐ Driverside Airbag ☐ Motorbelt ☐ Passengerside Airbag ☐ 2-Point Belt ☐ 3-Point Belt	☐ Yes ☒ No	☐ Front ☐ Rear ☐ 4-Wheel	☐ Car ☐ Sports Ult. ☐ Van ☐ Truck ☐ Minivan ☐ Motorcycle ☐ Other ___	☐ 2 Door ☐ 4-Door ☐ Stationwagon ☐ Pick Up Truck ☒ Other ___

FAILED COMPONENT(S)/PART(S) INFORMATION

Component	Part Name(s)	Location	Failed Part(s)
03250000	BRAKES:HYDRAULIC:ANTI-SKID SYSTEM	☐ Left ☐ Right ☐ Front ☐ Rear	☐ Original ☐ Replacement

No of Failures	Date(s) of Failure(s) / Mileage at Failure(s) / Vehicle Speed at failure(s)	Failed Part(s) Available?	NHTSA Previously Contacted?
		☐ Yes ☐ No	☐ Yes ☐ No

APPLICABLE INCIDENT INFORMATION

(Please describe in detail the incident(s), Failure(s), Crash(es), and injury(ies) on the back of this form)

Crash	Fire	Number of Persons Injured	Number of Fatalities	Estimated Property Damage	Reported to Police
☒ Yes ☐ No	☐ Yes ☒ No				☐ Yes ☒ No

NARRATIVE DESCRIPTION OF FAILURE(S),INCIDENT(S),INJURY(IES)

WHEN APPLYING THE ABS BRAKES THE PEDAL TRAVELED TO THE FLOOR, CAUSING EXTENDED STOPPING DISTANCE WHICH RESULTED IN A COLLISION. DEALER CANNOT IDENTIFY THE PROBLEM. PLEASE GIVE ANY FURTHER DETAILS. *AK

CONTINUE ON BACK IF NEEDED

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HS-Form 350 (Rev. 3/97)

00000034

Form Approved: O.M.B. No. 2127-0008

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

Auto Safety Hotline

Vehicle Owner's Questionnaire

NATIONWIDE 1-800-424-9393
DC METRO AREA (202) 366-0123
INTERNET: http://www.nhtsa.dot.gov

FOR AGENCY USE ONLY 117

Date Received: 3 Dec 1998

Od_or
rt_dt
od_rt
up_ltr

Reference No. 831733

OWNER INFORMATION (Type or Print)

484747

Work Number

Home Number

Do you authorize NHTSA to provide a copy of this report to the manufacturer of your vehicle? ☐ YES ☐ NO
In the absence of an authorization, NHTSA WILL NOT provide your name and address to the vehicle manufacturer.

Signature of Owner _____ Date ___/___/___

VEHICLE INFORMATION

Vehicle Ident. No. (VIN.) *(Located at bottom of windshield on driver's side)*	Vehicle Make	Vehicle Model	Vehicle Year	Current Odometer Reading
4S2CK58W5W4325617	ISUZU TRUCK	RODEO	1998	

Purchase Date: ☒ New ☐ Used

Dealer's Name _____
City _____ State _____ Zip Code _____

Engine Size (CID/CC/L ____ No Cylinders ____ ☐ Turbo ☐ Diesel ☐ Gas ☐ Fuel Injection

Transmission Type: ☐ Manual ☐ Automatic

Antilock Brakes: ☒ Yes ☐ No

Restraint System: ☐ Driverside Airbag ☒ Motorbelt ☐ Passengerside Airbag ☐ 2-Point Belt ☐ 3-Point Belt

Cruise Control: ☐ Yes ☒ No

DriveTrain: ☐ Front ☐ Rear ☐ 4-Wheel

Vehicle Type: ☐ Car ☐ Sports Utl ☐ Van ☐ Truck ☐ Minivan ☐ Motorcycle ☐ Other_

Body Style: ☐ 2-Door ☐ 4-Door ☐ Stationwagon ☒ Pick Up Truck ☐ Other_____

FAILED COMPONENT(S)/PART(S) INFORMATION

Component	Part Name(s)	Location	Failed Part(s)
03250000	BRAKES:HYDRAULIC:ANTI-SKID SYSTEM	☐ Left ☐ Right ☐ Front ☐ Rear	☐ Original ☐ Replacement

No of Failures: 5

Date(s) of Failure(s) 06-NOV-98
Mileage at Failure(s) 0
Vehicle Speed at failure(s) _____

Failed Part(s) Available? ☐ Yes ☐ No

NHTSA Previously Contacted? ☐ Yes ☐ No

APPLICABLE INCIDENT INFORMATION

(Please describe in detail the incident(s), Failure(s), Crash(es), and injury(ies) on the back of this form)

Crash	Fire	Number of Persons Injured	Number of Fatalities	Estimated Property Damage	Reported to Police
☒ Yes ☐ No	☐ Yes ☒ No	0	0	0	☐ Yes ☒ No

NARRATIVE DESCRIPTION OF FAILURE(S),INCIDENT(S),INJURY(IES)

WAS SLOWING DOWN FOR A STOP SIGN. HEARD GRINDING NOISES. BRAKE PEDAL WENT TO FLOOR, REARENDED ANOTHER VEHICLE. NEITHER AIR BAG DEPLOYED UPON IMPACT. BEEN TO DEALER 5 TIMES OR MORE FOR BRAKE PROBLEM. HAS SQUEALING IN ROTORS.

CONTINUE ON BACK IF NEEDED

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HS-Form 350 (Rev. 3/97)

0000035 S.S.

Form Approved: O.M.B. No. 2127-0008

US Department of Transportation
National Highway Traffic Safety Administration

AUTO SAFETY HOTLINE
VEHICLE OWNER'S QUESTIONNAIRE
NATIONWIDE 1-800-424-9393
DC METRO AREA 202-366-0123

COPIED QC'd POSTED

FOR AGENCY USE ONLY
DATE RECEIVED
REFERENCE NO.
543151

OWNER INFORMATION (TYPE OR PRINT)

NAME and ADDRESS
[redacted]

COPIED

DAY TIME TELEPHONE NO. (AREA CODE)
[redacted]

Do you authorize NHTSA to provide a copy of this report to the manufacturer of your vehicle? YES ☑ NO ☐
In the absence of an auth[redacted] name or address to the vehicle manufacturer.

SIGNATURE OF OWNER [redacted] DATE 12-21-98

[redacted]NFORMATION

VEHICLE IDENTIFICATION NO.*	VEHICLE MAKE	VEHICLE MODEL	MODEL YEAR
4S2CK58W3W4323185	98 ISUZU RODEO	RODEO	98

*LOCATED AT BOTTOM OF WINDSHIELD ON DRIVER'S SIDE

CURRENT ODOMETER READING: 2 7 0 1 3 (10 miles) (August 1998)
DATE PURCHASED JAN 2-98 ☐ NEW ☐ USED
DEALER'S NAME, CITY & STATE: Don Bohn Ford, 3737 Lepalco Blvd, Hanover Pa 70038
ENGINE SIZE (CID/CC/L) — ☐ TURBO ☐ DIESEL ☑ GAS ☐ FUEL INJECTN
NO. CYLINDERS

TRANSMISSION TYPE	ANTILOCK BRAKES	RESTRAINT SYSTEM	CRUISE CONTROL	DRIVETRAIN	BODY STYLE
☐ MANUAL ☑ AUTOMATIC	☐ YES ☑ NO	☑ DRIVERSIDE AIRBAG ☐ MOTORBELT ☐ PASSENGERSIDE AIRBAG ☐ 3-POINT BELT ☐ 2-POINT BELT	☑ YES ☐ NO	☐ FRONT ☐ REAR ☐ 4-WHEEL	STAWAG ___ HATCH BK ___ 4 DR ___ VAN ___ 2 DR ___ PK UP TRK ___ OTHER ___

FAILED COMPONENT(S)/PART(S) INFORMATION (REPORT TIRE INFORMATION ON BACK)

COMPONENT	PART NAME(S)	LOCATION	FAILED PART(S)
Brakes	Anti lock brakes	☐ LEFT ☑ FRONT ☐ RIGHT ☑ REAR	☐ ORIGINAL ☑ REPLACEMENT

NO. OF FAILURES: 3
DATE(S) OF FAILURE(S): Jan 31, 1998 - 1640 miles; Feb 2nd - 2417 miles
MILEAGE AT FAILURE(S): April 3 1998 - 7452 miles; June 5 - 1998 - 13620 miles
VEHICLE SPEED AT FAILURE(S): all speeds
MANUFACTURER CONTACTED: ☑ YES ☐ NO
NHTSA PREVIOUSLY CONTACTED: ☑ YES ☐ NO

APPLICABLE ACCIDENT INFORMATION

ACCIDENT	FIRE	NUMBER PERSONS INJURED	NUMBER OF FATALITIES	PROPERTY DAMAGE EST$	POLICE REPORTED
☐ YES ☑ NO	☐ YES ☑ NO				☐ YES ☐ NO

NARRATIVE DESCRIPTION OF FAILURE(S), ACCIDENT(S), INJURY(IES)

Brakes - no brakes at times - they replaced - over haul on brakes once already - still having serious problems - replaced muffler - still low and rattling - door hinge - loose - supposedly repaired before - had transmission leak twice -
(See attached copies)

CONTINUE ON BACK IF NEEDED

The Privacy Act of 1974
Public Law 93-579
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HS-Form 350 (Rev. 5-92)

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INVOICE

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[redacted]

INVOICE

PAGE 1

WITTY'S
3737 Lapeyrouse Blvd. at Woodmere · Harvey, LA 70058
Phone (504) 347-7000

SERVICE ADVISOR: 119 THERON J. GUIDRY

SPRUCE GRE	98	ISUZU RODEO	4S2CK58W3W4323185		1640/1640		HY223

DEL DATE	PROM. DATE	WARR. EXP.	PROMISED	PO NO.	RATE	PAYMENT	INV. DATE
31DEC97		31DEC00	09:00 26JAN98		60.00	CASH	21JAN98

R.O. OPENED	READY
21JAN98	21JAN98

OPTIONS: STK:46244 DLR:231009 ENG:3.2L TRN:4A

LINE OPCODE TECH TYPE HOURS LIST NET TOTAL

A LOW FUEL INDICATOR LIGHT IS OFF.
SOP IF WAS NECESSARY TO ORDER A PART FOR YOUR
VEHICLE, WE WILL NOTIFY YOU WHEN THE PART
ARRIVES. PLEASE CALL TO CONFIRM APPOINTMENT.
213 THOMAS, HENDERSON H. LIC#: 8337
CCI 0.00 0.00

PARTS: 0.00 LABOR: 0.00 OTHER: 0.00 TOTAL LINE A: 0.00

1640 SOP NEW FUEL SENSOR

****

B BRAKES SQUEAK ALL THE TIME
06BHU2 MACHINE ROTORS
213 THOMAS, HENDERSON H. LIC#: 8337
W194 (N/C)
1 950 BRAKE QUIET (N/C)
PC: PART#: COUNT:
CLAIM TYPE:
AUTH CODE:

PARTS: 0.00 LABOR: 0.00 OTHER: 0.00 TOTAL LINE B: 0.00

1640 RR ALL 4 WHEELS TO REMOVE RIGHT REAR WHEEL BRAKE DISC PADS TO
INSTALL STOP SQUEALTO REMOVE WHEEL BRAKE DISC PADS TURN
ALL 4 DISC ROTORS AND ROAD TEST OK

****

C SOUNDS LIKE TRANSMISSION GOES INTO GEAR VERY LOUD
NOPF NO PROBLEM FOUND
213 THOMAS, HENDERSON H. LIC#: 8337
CCI 0.00 0.00

PARTS: 0.00 LABOR: 0.00 OTHER: 0.00 TOTAL LINE C: 0.00

1640 PERFORM SYSTEM CK ON TRAN AND CK SYSTEM FOR PCM TRAN CODE NO CODE
IN SYSTEM AND ROAD TEST OK NPF

****

ON BEHALF OF SERVICING DEALER, I HEREBY CERTIFY THAT THE INFORMATION CONTAINED HEREON IS ACCURATE UNLESS OTHERWISE SHOWN. SERVICES DESCRIBED WERE PERFORMED AT NO CHARGE TO OWNER. THERE WAS NO INDICATION FROM THE APPEARANCE OF THE VEHICLE OR OTHERWISE, THAT ANY PART REPAIRED OR REPLACED UNDER THIS CLAIM HAD BEEN CONNECTED IN ANY WAY WITH ANY ACCIDENT, NEGLIGENCE OR MISUSE. RECORDS SUPPORTING THIS CLAIM ARE AVAILABLE FOR (1) YEAR FROM THE DATE OF PAYMENT NOTIFICATION AT THE SERVICING DEALER FOR INSPECTION BY MANUFACTURER'S REPRESENTATIVE.

(SIGNED) DEALER, GENERAL MANAGER OR AUTHORIZED PERSON (DATE)

STATEMENT OF DISCLAIMER

The factory warranty constitutes all of the warranties with respect to the sale of this merchandise. The Seller hereby expressly disclaims all warranties either express or implied, including any implied warranty of merchantability or fitness for a particular purpose. Seller neither assumes nor authorizes any other person to assume for it any liability in connection with the sale of this item/items.

CUSTOMER SIGNATURE

DESCRIPTION	TOTALS
LABOR AMOUNT	
PARTS AMOUNT	
GAS, OIL, LUBE	
SUBLET AMOUNT	
MISC. CHARGES	
TOTAL CHARGES	
LESS INSURANCE	
SALES TAX	
PLEASE PAY THIS AMOUNT	

CUSTOMER COPY

00000037

70001338 160001

[redacted]

INVOICE

PAGE 2

WESTBANK

3757 Lapalco Blvd. at Woodmere Harvey, LA 70058
Phone (504) 347-7000

SERVICE ADVISOR: 119 THERON J. GUIDRY

DESIGN	YEAR	MAKE/MODEL	VIN	LICENSE	MILEAGE IN/OUT	R.O. NO.
SERICE GRE	98	ISUZU RODEO	4S2CK58W3W4323185		1640/1640	TY222

DEL DATE	PROD. DATE	WARR. EXP.	PROMISED	PO NO.	RATE	PAYMENT	INV. DATE
31DEC97		31DEC00	09:00 26JAN98		60.00	CASH	21JAN98

R.O. OPENED	READY	OPTIONS: STK:46244 DLR:23I009 ENG:3.2L TRN:4A
21JAN98	21JAN98	

LINE	OPCODE	TECH	TYPE	HOURS	LIST	NET	TOTAL
D	TURN IGNITION AND VEH DOESN'T START RIGHT AWAY HAVE TO GIVE IT GAS						
	UTV OUR TECHNICIANS HAVE BEEN UNABLE TO VERIFY						
	YOUR CONCERN. PLEASE INFORM US IF THE						
	CONCERN RETURNS AS QUICKLY AS POSSIBLE						
	213 THOMAS/HENDERSON H. LIC#: 8337						
	CCI					0.00	0.00

PARTS: 0.00 LABOR: 0.00 OTHER: 0.00 TOTAL LINE D: 0.00

1640 PERFORM FUEL SYSTEM AND ENG CK NPF NORMAL UTV

****

ON BEHALF OF SERVICING DEALER, I HEREBY CERTIFY THAT THE INFORMATION CONTAINED HEREON IS ACCURATE UNLESS OTHERWISE SHOWN. SERVICES DESCRIBED WERE PERFORMED AT NO CHARGE TO OWNER. THERE WAS NO INDICATION FROM THE APPEARANCE OF THE VEHICLE OR OTHERWISE, THAT ANY PART REPAIRED OR REPLACED UNDER THIS CLAIM HAD BEEN CONNECTED IN ANY WAY WITH ANY ACCIDENT, NEGLIGENCE OR MISUSE. RECORDS SUPPORTING THIS CLAIM ARE AVAILABLE FOR (1) YEAR FROM THE DATE OF PAYMENT NOTIFICATION AT THE SERVICING DEALER FOR INSPECTION BY MANUFACTURER'S REPRESENTATIVE.

(SIGNED) DEALER, GENERAL MANAGER OR AUTHORIZED PERSON (DATE)

STATEMENT OF DISCLAIMER

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CUSTOMER SIGNATURE

DESCRIPTION	TOTALS
LABOR AMOUNT	0.00
PARTS AMOUNT	0.00
GAS, OIL, LUBE	0.00
SUBLET AMOUNT	0.00
MISC. CHARGES	0.00
TOTAL CHARGES	0.00
LESS INSURANCE	0.00
SALES TAX	0.00
PLEASE PAY THIS AMOUNT	0.00

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CUSTOMER COPY

70001338

149709

INVOICE

[redacted]

PAGE 1

WESTBANK

3737 Lapalco Blvd. at Woodmere, Harvey, LA 70058
Phone (504) 347-7000

SERVICE ADVISOR: 119 THERON J. GUIDRY

COLOR	YEAR	MAKE/MODEL	VIN	LICENSE	MILEAGE IN/OUT	TAG
SPROCE GRE	98	ISUZU RODEO	4S2CK58W3W4323185		2417/2417	TY233

DEL DATE	PROD. DATE	WARR. EXP.	PROMISED	PO NO.	RATE	PAYMENT	INV. DATE
31DEC97		31DEC00	12:54 04FEB98		60.00	CASH	02FEB98

R/O OPENED	READY	OPTIONS:
30JAN98	02FEB98	STK:46244 DLR:231009 ENG:3.2L TRN:4A

LINE OPCODE TECH TYPE HOURS LIST NET TOTAL

A LOW FUEL LIGHT INOP.
NOPF NO PROBLEM FOUND
173 CANSELO,JEROME LIC#: 0244
CCI 0.00 0.00

PARTS: 0.00 LABOR: 0.00 OTHER: 0.00 TOTAL LINE A: 0.00

2417 CK FUEL LIGHT INOP,CK FOND VEH CLUSTER DONT HAV E LOW FUEL LIGHT HAVE GUAGE. NO PROBLEM FOUND.
****

B BRAKES LOCKING UP. THE DAY BEFORE THE BRAKES WENT OUT ALL TOGETHER ALSO MAKES A LOUD NOISE WHEN APPLIED
NOPF NO PROBLEM FOUND
173 CANSELO,JEROME LIC#: [illegible]
CCI 0.00 0.00

PARTS: 0.00 LABOR: [illegible] 0.00 TOTAL LINE B: 0.00

2417 CK BRAKES LOCKING UP,CK BRAKE [illegible] 8 MILES CK OPPERATION OK NO PROBLEM FOUND AT THIS TIME
****

C KEYLESS REMOTE INOP
131803 REMOTE TRANSMITTER REPROGRAM
173 CANSELO,JEROME LIC#: 0244
WI94 (N/C)
FC: PART#: COUNT:
CLAIM TYPE:
AUTH CODE:

PARTS: 0.00 LABOR: 0.00 OTHER: 0.00 TOTAL LINE C: 0.00

2417 CK KEYLESS REMOTE INOP,REPROGRAM REMOTE TEST OK (NOTE DOORS MUST BE CLOSE TO OPPERATE REMOTE.) WARRANTY
****

D DOOR LOCKS MAKES A PING SOUND WHEN LOCKING DOORS
NN NORMAL NOISE

ON BEHALF OF SERVICING DEALER, I HEREBY CERTIFY THAT THE INFORMATION CONTAINED HEREON IS ACCURATE UNLESS OTHERWISE SHOWN. SERVICES DESCRIBED WERE PERFORMED AT NO CHARGE TO OWNER. THERE WAS NO INDICATION FROM THE APPEARANCE OF THE VEHICLE OR OTHERWISE, THAT ANY PART REPAIRED OR REPLACED UNDER THIS CLAIM HAD BEEN CONNECTED IN ANY WAY WITH ANY ACCIDENT, NEGLIGENCE OR MISUSE. RECORDS SUPPORTING THIS CLAIM ARE AVAILABLE FOR (1) YEAR FROM THE DATE OF PAYMENT NOTIFICATION AT THE SERVICING DEALER FOR INSPECTION BY MANUFACTURER'S REPRESENTATIVE.

(SIGNED) DEALER, GENERAL MANAGER OR AUTHORIZED PERSON (DATE)

STATEMENT OF DISCLAIMER

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CUSTOMER SIGNATURE

DESCRIPTION	TOTALS
LABOR AMOUNT	
PARTS AMOUNT	
GAS, OIL, LUBE	
SUBLET AMOUNT	
MISC. CHARGES	
TOTAL CHARGES	
LOSS INSURANCE	
SALES TAX	
PLEASE PAY THIS AMOUNT	

CUSTOMER COPY

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149709

INVOICE

[redacted]

PAGE 2

WESTBANK

3737 Lapalco Blvd. at Woodmere · Harvey, LA 70058
Phone (504) 347-7000

SERVICE ADVISOR: 119 THERON J. GUIDRY

COLOR	YEAR	MAKE/MODEL	VIN	LICENSE	MILEAGE IN/OUT	TAG
SPRUCE GRE	98	ISUZU RODEO	4S2CK58W3W4323185		2417/2417	TY233

DEL DATE	PROD. DATE	WARR. EXP.	PROMISED	PO NO.	RATE	PAYMENT	INV. DATE
31DEC97		31DEC00	12:54 04FEB98		60.00	CASH	02FEB98

R.O. OPENED	READY	OPTIONS:
30JAN98	02FEB98	STK:46244 DLR:23I009 ENG:3.2L TRN:4A

LINE OPCODE TECH TYPE HOURS LIST NET TOTAL

173 CANSELO,JEROME LIC#: 0244
CCI 0.00 0.00

PARTS: 0.00 LABOR: 0.00 OTHER: 0.00 TOTAL LINE D: 0.00

2417 CK DOOR LOCK MAKES A PING SOUND WHEN LOCKING DO ORS. CK WITH OTHER STOKC UNIT,NORMAL NOISE.

****

E FUEL INDICATOR OUT CHECK ON SOP PART
020388D REPLACE FUEL PUMP
173 CANSELO,JEROME LIC#: 0244
WI94 (N/C)
1 8-25166-689-0 PUMP; FUEL (N/C)
FC: PART#: COUNT:
CLAIM TYPE:
AUTH CODE:

PARTS: 0.00 LABOR: 0.00 OTHER: 0.00 TOTAL LINE E: 0.00

2417 CK FUEL INDICATOR OUT,R&R FUEL TANK REPLACE FUEL SENDER UNIT,TEST OK WARRANTY

****

ON BEHALF OF SERVICING DEALER, I HEREBY CERTIFY THAT THE INFORMATION CONTAINED HEREON IS ACCURATE UNLESS OTHERWISE SHOWN. SERVICES DESCRIBED WERE PERFORMED AT NO CHARGE TO OWNER. THERE WAS NO INDICATION FROM THE APPEARANCE OF THE VEHICLE OR OTHERWISE, THAT ANY PART REPAIRED OR REPLACED UNDER THIS CLAIM HAD BEEN CONNECTED IN ANY WAY WITH ANY ACCIDENT, NEGLIGENCE OR MISUSE. RECORDS SUPPORTING THIS CLAIM ARE AVAILABLE FOR (1) YEAR FROM THE DATE OF PAYMENT NOTIFICATION AT THE SERVICING DEALER FOR INSPECTION BY MANUFACTURER'S REPRESENTATIVE.

STATEMENT OF DISCLAIMER
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DESCRIPTION	TOTALS
LABOR AMOUNT	0.00
PARTS AMOUNT	0.00
GAS, OIL, LUBE	0.00
SUBLET AMOUNT	0.00
MISC. CHARGES	0.00
TOTAL CHARGES	0.00
LESS INSURANCE	0.00
SALES TAX	0.00
PLEASE PAY THIS AMOUNT	0.00

SIGNED DEALER, GENERAL MANAGER OR AUTHORIZED PERSON (DATE)

CUSTOMER SIGNATURE

CUSTOMER COPY

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INVOICE

[redacted]

PAGE 1

WESTBANK

3737 Lapalco Blvd. at Woodmere · Harvey, LA 70058
Phone (504) 347-7000

SERVICE ADVISOR: 211 ARDEN P. HUDSON

COLOR	YEAR	MAKE/MODEL	VIN	LICENSE	MILEAGE IN/OUT	TAG
SPRUCE GRE	98	ISUZU RODEO	4S2CK58W3W4323185		3774/3774	TY212

DEL DATE	PROD. DATE	WARR. EXP.	PROMISED	PO NO.	RATE	PAYMENT	INV. DATE
31DEC97		31DEC00	14:36 20FEB98		60.00	CASH	18FEB98

R.O. OPENED	READY	OPTIONS: STK:46244 DLR:23I009 ENG:3.2L TRN:4A
18FEB98	18FEB98	

LINE OPCODE TECH TYPE HOURS LIST NET TOTAL

A OIL LEAKING FROM OIL PAN....
NOPF NO PROBLEM FOUND
215 ISBELL,JOHN LIC#: 4293
CCI 0.00 0.00
PARTS: 0.00 LABOR: 0.00 OTHER: 0.00 TOTAL LINE A: 0.00

3774 PERFORM ENG OIL LEAK TEST NPF
****

B OIL LEAKING FROM POWER STEERING....
100422 REINSTALL TIE ROD END
215 ISBELL,JOHN LIC#: 4[illegible]
WI94 (N/C)
100344 REINSTALL OIL SEAL[illegible]
[illegible]
WI94 (N/C)
1 12377981 CLEANER (N/C)
1 1052884 FLUID (N/C)
FC: PART#: COUNT:
CLAIM TYPE:
AUTH CODE:

PARTS: 0.00 LABOR: 0.00 OTHER: 0.00 TOTAL LINE B: 0.00

3774 TO REPAIR OIL LEAK FROM LEFT SIDE OF POWER STEERING RACK REINSTALL OIL SEAL ON LEFT SIDE OF STEERING REINSTALL TIE ROD ON RACK AND ROAD TEST AND RE CK LEAK OK
****

ON BEHALF OF SERVICING DEALER, I HEREBY CERTIFY THAT THE INFORMATION CONTAINED HEREON IS ACCURATE UNLESS OTHERWISE SHOWN. SERVICES DESCRIBED WERE PERFORMED AT NO CHARGE TO OWNER. THERE WAS NO INDICATION FROM THE APPEARANCE OF THE VEHICLE OR OTHERWISE, THAT ANY PART REPAIRED OR REPLACED UNDER THIS CLAIM HAD BEEN CONNECTED IN ANY WAY WITH ANY ACCIDENT, NEGLIGENCE OR MISUSE. RECORDS SUPPORTING THIS CLAIM ARE AVAILABLE FOR (1) YEAR FROM THE DATE OF PAYMENT NOTIFICATION AT THE SERVICING DEALER FOR INSPECTION BY MANUFACTURER'S REPRESENTATIVE.

STATEMENT OF DISCLAIMER
The factory warranty constitutes all of the warranties with respect to the sale of this item/name. The Seller hereby expressly disclaims all warranties either express or implied, including any implied warranty of merchantability or fitness for a particular purpose. Seller neither assumes nor authorizes any other person to assume for it any liability in connection with the sale of this item/name.

DESCRIPTION	TOTALS
LABOR AMOUNT	0.00
PARTS AMOUNT	0.00
GAS, OIL, LUBE	0.00
SUBLET AMOUNT	0.00
MISC. CHARGES	0.00
TOTAL CHARGES	0.00
LESS INSURANCE	0.00
SALES TAX	0.00
PLEASE PAY THIS AMOUNT	0.00

(SIGNED) DEALER, GENERAL MANAGER OR AUTHORIZED PERSON (DATE)

CUSTOMER SIGNATURE

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PAGE 1

WESTBANK

3737 Lapalco Blvd. at Woodmere Harvey, LA 70058
Phone (504) 347-7000

SERVICE ADVISOR: 211 ARDEN P. HUDSON

COLOR	YEAR	MAKE/MODEL	VIN	LICENSE	MILEAGE IN/OUT	TAG
SPRUCE GRE	98	ISUZU RODEO	4S2CK58N3W4323185		7452/7453	TY268

OR DATE	PROD. DATE	WARR. EXP.	PROMISED	PO NO.	RATE	PAYMENT	INV. DATE
31DEC97		31DEC00	18:36 06APR98		60.00	CASH	03APR98

R.O. OPENED	READY	OPTIONS: STR:46244 DLR:231009 ENG:3.2L TRN:4A
02APR98	03APR98	

LINE OPCODE TECH TYPE HOURS LIST NET TOTAL

A POWER STEERING LEAKING
NLP NO LEAKS FOUND
175 DAVIS,KEITH LIC#: 6697
CCI 0.00 0.00
PARTS: 0.00 LABOR: 0.00 OTHER: 0.00 TOTAL LINE A: 0.00

7452 INSPECT UNDER CARRAIGE AND PS UNIT FOR LEAKS NO LEAKS FOUND AT THIS TIME

****

B REAR WINDOW LOCK INOP AT TIMES
NOPF NO PROBLEM FOUND
175 DAVIS,KEITH LIC#: 6697
CCI 0.00 0.00
PARTS: 0.00 LABOR: 0.00 OTHER: 0.00 TOTAL LINE B: 0.00

7452 CHECK OPERATION OF REAR WINDOW LOCK WITH TRANSMITTER MANUEL AND INSIDE LOCK NO PROBLEM FOUND

****

C BRAKES SOUND LIKE BRAKES ARE GRINDING
NN NORMAL NOISE
175 DAVIS,KEITH LIC#: 6697
CCI 0.00 0.00
PARTS: 0.00 LABOR: 0.00 OTHER: 0.00 TOTAL LINE C: 0.00

7452 INSPECT CONDITION OF BRAKES ALL BRAKES ARE GOOD NORMAL METALLIC NOISES

****

ON BEHALF OF SERVICING DEALER, I HEREBY CERTIFY THAT THE INFORMATION CONTAINED HEREON IS ACCURATE UNLESS OTHERWISE SHOWN. SERVICES DESCRIBED WERE PERFORMED AT NO CHARGE TO OWNER. THERE WAS NO INDICATION FROM THE APPEARANCE OF THE VEHICLE OR OTHERWISE, THAT ANY PART REPAIRED OR REPLACED UNDER THIS CLAIM HAD BEEN CONNECTED IN ANY WAY WITH ANY ACCIDENT, NEGLIGENCE OR MISUSE. RECORDS SUPPORTING THIS CLAIM ARE AVAILABLE FOR (1) YEAR FROM THE DATE OF PAYMENT NOTIFICATION AT THE SERVICING DEALER FOR INSPECTION BY MANUFACTURER'S REPRESENTATIVE.

(SIGNED) DEALER, GENERAL MANAGER OR AUTHORIZED PERSON (DATE)

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CUSTOMER SIGNATURE

DESCRIPTION	TOTALS
LABOR AMOUNT	0.00
PARTS AMOUNT	0.00
GAS, OIL, LUBE	0.00
SUBLET AMOUNT	0.00
MISC. CHARGES	0.00
TOTAL CHARGES	0.00
LESS INSURANCE	0.00
SALES TAX	0.00
PLEASE PAY THIS AMOUNT	0.00

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[redacted]

SERVICE ADVISOR: 119 THERON J. GUIDRY

SPRUCE GRS	98	ISUZU RODEO	4S2CK58W3W4323185			13620/13620	

DEL DATE	PROD. DATE	WARR. EXP.	PROMISED	PO NO	RATE	PAYMENT	INVOICE
31DEC97		31DEC00	12:12 09JUN98		60.00	CASH	05JUN98

R.O. OPENED	READY	OPTIONS
04JUN98	05JUN98	STK:46244 DLR:23I009 ENG:3.2L TRN:4A

LINE OPCODE TECH TYPE HOURS LIST NET TOTAL

13620 CK BRAKES SQUEAK EXCESSIVELY,R&R FRONT BRAKES P ADS SAND PADS ADD BRAKE SILENCER TO PADS,REFACE ROTORS. R&R REAR BRAKE DRUMS FOUND RIGHT REAR B RAKES SHOES CRACKING,REPLACE REAR BRAKE SHOES,A DD BRAKE SILENCER TO SHOES,REFACE DRUMS,TEST TR OVE OK. WARRANTY

****

D RATTLE FRONT OF VEHICLE ALL THE TIME
NOPF NO PROBLEM FOUND
173 CANSELO,JEROME LIC#: 0244
CCI

PARTS: 0.00 LABOR: 0.00 OTHER: 0.00 TOTAL LINE D: 0.00 0.00 0.00

13620 CK RATTLE FROM FRONT OF VEH ALL THE TIME,RAISE VEH UP IN THE CK UNDER VEH,CK TIGHTEN UNDER VEH TEST DRIVE NO PROBLEM FOUND AT THIS TIME.

****

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DESCRIPTION	TOTALS
LABOR AMOUNT	0.00
PARTS AMOUNT	0.00
GAS, OIL, LUBE	0.00
SUBLET AMOUNT	0.00
MISC. CHARGES	0.00
TOTAL CHARGES	0.00
LESS INSURANCE	0.00
SALES TAX	0.00
PLEASE PAY THIS AMOUNT	0.00

SIGNED DEALER, GENERAL MANAGER OR AUTHORIZED PERSON (DATE)

CUSTOMER SIGNATURE

CUSTOMER COPY

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[redacted]

[redacted]

3737 Lapeko Blvd. at Woodmere, Harvey, CA 70058
Phone (504) 347-7000

SERVICE ADVISOR: 119 THERON J. GUIDRY

DEL CODE	YEAR	MAKE/MODEL	VIN	LICENSE	MILEAGE IN/OUT	
SPRUCE GRE	98	ISUZU RODEO	4S2CK58W3W4323185		13620/13620	TB3[illegible]

DEL DATE	PROM DATE	WARR EXP	PROMISED	PO NO	RATE	PAYMENT	INV DATE
31DEC97		31DEC00	12:12 05JUN98		60.00	CASH	05JUN98

R.O. OPENED	READY	OPTIONS:
04JUN98	05JUN98	STK:46244 DLR:231009 ENG:3.2L TRN:4A

LINE OPCODE TECH TYPE HOURS LIST NET TOTAL

A NOISE COMING FROM DRIVE TRAIN.....
NN NORMAL NOISE
173 CANSELO,JEROME LIC#: 0244
CCI 0.00 0.00
PARTS: 0.00 LABOR: 0.00 OTHER: 0.00 TOTAL LINE A: 0.00

13620 CK NOISE COMING FROM DRIVE TRAIN,CK NORMAL ENG NOISE.
****

B PERFORM RECALL 9804L2
SOP IT WAS NECESSARY TO ORDER A PART FOR YOUR
VEHICLE,WE WILL NOTIFY YOU WHEN THE PART
ARRIVES. PLEASE CALL TO CONFIRM APPOINTMENT.
173 CANSELO,JEROME LIC#: 0244
CCI 0.00 0.00
PARTS: 0.00 LABOR: 0.00 OTHER: 0.00 TOTAL LINE B: 0.00

13620 SOP
****

C BRAKES SQUEAK EXCESSIVELY
068802 MACHINE FRONT ROTORS
173 CANSELO,JEROME LIC#: 0244
WI94 (N/C)
2 80GRIT (N/C)
1 5-87831-723-0 SHOE KIT; BRAK (N/C)
1 80GRIT (N/C)
068866 MACHINE REAR DRUMS AND REPLACE SHOES
173 CANSELO,JEROME LIC#: 0244
WI94 (N/C)
FC: PART#: COUNT:
CLAIM TYPE:
AUTH CODE:

PARTS: 0.00 LABOR: 0.00 OTHER: - 0.00 TOTAL LINE C: 0.00

ON BEHALF OF SERVICING DEALER, I HEREBY CERTIFY THAT THE INFORMATION CONTAINED HEREON IS ACCURATE UNLESS OTHERWISE SHOWN. SERVICES DESCRIBED WERE PERFORMED AT NO CHARGE TO OWNER. THERE WAS NO INDICATION FROM THE APPEARANCE OF THE VEHICLE OR OTHERWISE, THAT ANY PART REPAIRED OR REPLACED UNDER THIS CLAIM HAD BEEN CONNECTED IN ANY WAY WITH ANY ACCIDENT, NEGLIGENCE OR MISUSE. RECORDS SUPPORTING THIS CLAIM ARE AVAILABLE FOR (1) YEAR FROM THE DATE OF PAYMENT NOTIFICATION AT THE SERVICING DEALER FOR INSPECTION BY MANUFACTURER'S REPRESENTATIVE.

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DESCRIPTION	TOTALS
LABOR AMOUNT	
PARTS AMOUNT	
GAS, OIL, LUBE	
SUBLET AMOUNT	
MISC CHARGES	
TOTAL CHARGES	
LESS INSURANCE	
SALES TAX	
PLEASE PAY THIS AMOUNT	

SIGNED: DEALER GENERAL MANAGER OR AUTHORIZED PERSON DATE:

CUSTOMER SIGNATURE

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PAGE 2

3737 Lapalco Blvd. at Woodmere · Harvey, LA 70058
Phone (504) 347-7900

SERVICE ADVISOR: 119 THERON J. GUIDRY

COLOR	YEAR	MAKE/MODEL	VIN	LICENSE	[illegible]
SPRUCE GRE	98	ISUZU RODEO	4S2CK58W3W4323185		14813/14813

DEL DATE	PROD. DATE	WARR. EXP.	PROMISED	PO NO.	RATE	PAYMENT	[illegible]
31DEC97		31DEC00	13:30 18JUN98		60.00	CASH	30JUN98

R.O. OPENED	READY	OPTIONS:
16JUN98	30JUN98	STK:46244 DLR:231009 ENG:3.2L TRN:4A

LINE	OPCODE	TECH	TYPE	HOURS	LIST	NET	TOTAL

PARTS: 0.00 LABOR: 0.00 OTHER: 0.00 TOTAL LINE C: 0.00

14813 SEE SERVICE

****

ON BEHALF OF SERVICING DEALER, I HEREBY CERTIFY THAT THE INFORMATION CONTAINED HEREON IS ACCURATE UNLESS OTHERWISE SHOWN. SERVICES DESCRIBED WERE PERFORMED AT NO CHARGE TO OWNER. THERE WAS NO INDICATION FROM THE APPEARANCE OF THE VEHICLE OR OTHERWISE, THAT ANY PART REPAIRED OR REPLACED UNDER THIS CLAIM HAD BEEN CONNECTED IN ANY WAY WITH ANY ACCIDENT, NEGLIGENCE OR MISUSE. RECORDS SUPPORTING THIS CLAIM ARE AVAILABLE FOR (1) YEAR FROM THE DATE OF PAYMENT NOTIFICATION AT THE SERVICING DEALER FOR INSPECTION BY MANUFACTURER'S REPRESENTATIVE.

(SIGNED) DEALER, GENERAL MANAGER, OR AUTHORIZED PERSON (DATE)

STATEMENT OF DISCLAIMER

The factory warranty constitutes all of the warranties with respect to the use of the merchandise. The Seller hereby expressly disclaims all warranties, either express or implied, including any implied warranty of merchantability, or fitness for a particular purpose. Seller neither assumes nor authorizes any other person to assume for it any liability in connection with the sale of this merchandise.

CUSTOMER SIGNATURE

DESCRIPTION	TOTAL
LABOR AMOUNT	0.00
PARTS AMOUNT	0.00
GAS, OIL, LUBE	0.00
SUBLET AMOUNT	0.00
MISC. CHARGES	0.00
TOTAL CHARGES	0.00
LESS INSURANCE	0.00
SALES TAX	0.00
PLEASE PAY THIS AMOUNT	0.00

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PROVIDED BY THE VEHICLE MANUFACTURER

[redacted]

SERVICE ADVISOR: 239 MICHAEL WILLIAMS

SPRINT GRE 98	ISUZU RODEO		4S2CK58YXW4323183			17605/17605	
DELIVERY DATE	PROD. DATE	WARR. EXP.	PROMISED	R.O. NO.	DATE	PAYMENT	INVOICE
31DEC97		31DEC00	17:30 13AUG98		60.00	CASH	13AUG98
ARRIVED		READY	OPTIONS: STK:46244 DLR:23I009 ENG:3.2L TRN:4A				
05AUG98		13AUG98					

LINE-OPCODE	TECH	TYPE	HOURS	LIST	NET	ADJ (B/C)
	163	WX94				

FC: PART#: COUNT:
CLAIM TYPE:
ALTH CODE:

PARTS: 0.00 LABOR: 0.00 OTHER: 0.00 TOTAL LINE E: 0.00

17605 PREFORM FRONTEND ALIGNMENT
****

ON BEHALF OF SERVICING DEALER, I HEREBY CERTIFY THAT THE INFORMATION CONTAINED HEREON IS ACCURATE UNLESS OTHERWISE SHOWN. SERVICES DESCRIBED WERE PERFORMED AT NO CHARGE TO OWNER. THERE WAS NO INDICATION FROM THE APPEARANCE OF THE VEHICLE OR OTHERWISE, THAT ANY PART REPAIRED OR REPLACED UNDER THIS CLAIM HAD BEEN CONNECTED IN ANY WAY WITH ANY ACCIDENT, NEGLIGENCE OR MISUSE. RECORDS SUPPORTING THIS CLAIM ARE AVAILABLE FOR (1) YEAR FROM THE DATE OF PAYMENT NOTIFICATION AT THE SERVICING DEALER FOR INSPECTION BY MANUFACTURER'S REPRESENTATIVE

SIGNED: DEALER, GENERAL MANAGER OR AUTHORIZED PERSON DATE

STATEMENT OF DISCLAIMER

The factory warranty [illegible] all of the warranties with respect to the sale of this [illegible]. The Seller hereby disclaims dealers or warranties either express or implied, including any implied warranty of merchantability or fitness for a particular purpose. Seller neither assumes nor authorizes any other person to assume for it any liability in connection with the sale of this [illegible]

CUSTOMER SIGNATURE

DESCRIPTION	TOTALS
LABOR AMOUNT	0.00
PARTS AMOUNT	0.00
GAS, OIL, LUBE	0.00
SUBLET AMOUNT	0.00
MISC. CHARGES	0.00
TOTAL CHARGES	0.00
LESS INSURANCE	0.00
SALES TAX	0.00
PLEASE PAY THIS AMOUNT	0.00

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PAGE 1

3737 Lapalco Blvd. at Woodmere - Harvey, LA 70058
Phone (504) 347-7000

SERVICE ADVISOR: 119 THERON J. GUIDRY

COLOR	YEAR	MAKE/MODEL	VIN	LICENSE	MILEAGE	ENTRY
SPRUCE GRE	98	ISUZU RODEO	4S2CK58W3W4323185		23106/23106	TR372

DEL DATE	PROD. DATE	WARR. EXP.	PROMISED	PO NO.	RATE	PAYMENT	INVOICE
31DEC97		31DEC00	WAIT 17OCT98		60.00	CASH	17OCT98

R.O. OPENED	READY	OPTIONS: STK:46244 DLR:231009 ENG:3.2L TRN:4A
17OCT98	17OCT98	

LINE OPCODE TECH TYPE HOURS	LIST	NET	TOTAL
A RECALL 98V170 GROUND WIRE HARNESS REPLACEMENT			
114795 96V170 INSPECTION			
124 WI94			(N/C)
1 8-97211-283-0 HARNESS; CABLE			(N/C)
1 2-90028-760-0 LABEL; RECALL			(N/C)
1 5-09707-031-0 CLIP;BAND,FUEL			(N/C)

PARTS: 0.00 LABOR: 0.00 OTHER: 0.00 TOTAL LINE A: 0.00

23106 PERFORM RECALL 98V170 GROUND WIRE HARNESS
****

B** RATTLE UNDER VEH WHEN STARTING
UTD TECHNICIAN UNABLE TO DUPLICATE CUSTOMER
CONCERN AT THIS T: 0.00 0.00
124 CC
PARTS: 0.00 LABOR: 0.00 OTHER: 0.00 TOTAL LINE B: 0.00

23106 NO RATTLE FOUND UNABLE TO VERIFY.
****

ON BEHALF OF SERVICING DEALER, I HEREBY CERTIFY THAT THE INFORMATION CONTAINED HEREON IS ACCURATE UNLESS OTHERWISE SHOWN. SERVICES DESCRIBED WERE PERFORMED AT NO CHARGE TO OWNER. THERE WAS NO INDICATION FROM THE APPEARANCE OF THE VEHICLE OR OTHERWISE, THAT ANY PART REPAIRED OR REPLACED UNDER THIS CLAIM HAD BEEN CONNECTED IN ANY WAY WITH ANY ACCIDENT, NEGLIGENCE OR MISUSE. RECORDS SUPPORTING THIS CLAIM ARE AVAILABLE FOR (1) YEAR FROM THE DATE OF PAYMENT NOTIFICATION AT THE SERVICING DEALER FOR INSPECTION BY MANUFACTURER'S REPRESENTATIVE.

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DESCRIPTION	TOTALS
LABOR AMOUNT	0.00
PARTS AMOUNT	0.00
GAS, OIL, LUBE	0.00
SUBLET AMOUNT	0.00
MISC. CHARGES	0.00
TOTAL CHARGES	0.00
LESS INSURANCE	0.00
SALES TAX	0.00
PLEASE PAY THIS AMOUNT	0.00

INSURED: DEALER, GENERAL MANAGER OR AUTHORIZED PERSON DATE:

CUSTOMER SIGNATURE

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PAGE 1

WESTBANK

3737 Lapalco Blvd. at Woodmere · Harvey, LA 70058
Phone (504) 347-7000

SERVICE ADVISOR: 119 THERON J. GUIDRY

COLOR	YEAR	MAKE/MODEL	VIN	LICENSE	MILEAGE IN/OUT	TAG
SPRUCE GRE	98	ISUZU RODEO	4S2CK58W3W4323185		24598/24598	TB393

DEL DATE	PROD. DATE	WARR. EXP.	PROMISED	PO NO.	RATE	PAYMENT	INV. DATE
31DEC97		31DEC00	WAIT 02NOV98		60.00	CASH	02NOV98

R.O. OPENED	READY	OPTIONS: STK:46244 DLR:231009 ENG:3.2L TRN:4A
02NOV98	02NOV98	

LINE OPCODE TECH TYPE HOURS LIST NET TOTAL

A SUSPENSION RATTLES OVER BUMPS ALL THE TIME....
130945 TIGHTENED HOOD DEFLECTOR
175 DAVIS,KEITH LIC#: 6697
WI94 (N/C)

PARTS: 0.00 LABOR: 0.00 OTHER: 0.00 TOTAL LINE A: 0.00

24598 CHECK FOR RATTLE AND FOUND BUG DEFLECTOR RATTLING TIGHTEN HOLD DOWNS FOR DEFLECTOR TO REPAIR
****

B CHECK ENGINE STUMBLES ON ACCLERATION
UTV OUR TECHNICIANS HAVE BEEN UNABLE TO VERIFY YOUR CONCERN. PLEASE INFORM US IF THE CONCERN RETURNS AS QUICKLY AS POSSIBLE
175 DAVIS,KEITH LIC#: 6697
CCI 0.00 0.00
PARTS: 0.00 LABOR: 0.00 OTHER: 0.00 TOTAL LINE B: 0.00

24598 TEST DRIVE VEHICLE UTV
****

C CHECK RATTELING NOISE COMING FROM PASSENGER DOOR AREA
111705 ADJUST HOOD HINGES AND STOPS
175 DAVIS,KEITH LIC#: 6697
WI94 (N/C)

PARTS: 0.00 LABOR: 0.00 OTHER: 0.00 TOTAL LINE C: 0.00

24598 CHECK NOISE AND FOUND SQUEEKING NOISE FROM DASH AREA ADJUST HOOD HINGES AND STOPS TO REPAIR
****

D CHECK RATTELING NOISE COMING FROM UNDERNEATH VEHICLE
SLA SEE REPAIR ON LINE A

ON BEHALF OF SERVICING DEALER, I HEREBY CERTIFY THAT THE INFORMATION CONTAINED HEREON IS ACCURATE UNLESS OTHERWISE SHOWN. SERVICES DESCRIBED WERE PERFORMED AT NO CHARGE TO OWNER. THERE WAS NO INDICATION FROM THE APPEARANCE OF THE VEHICLE OR OTHERWISE, THAT ANY PART REPAIRED OR REPLACED UNDER THIS CLAIM HAD BEEN CONNECTED IN ANY WAY WITH ANY ACCIDENT, NEGLIGENCE OR MISUSE. RECORDS SUPPORTING THIS CLAIM ARE AVAILABLE FOR (1) YEAR FROM THE DATE OF PAYMENT NOTIFICATION AT THE SERVICING DEALER FOR INSPECTION BY MANUFACTURER'S REPRESENTATIVE.

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DESCRIPTION	TOTALS
LABOR AMOUNT	
PARTS AMOUNT	
GAS, OIL, LUBE	
SUBLET AMOUNT	
MISC. CHARGES	
TOTAL CHARGES	
LESS INSURANCE	
SALES TAX	
PLEASE PAY THIS AMOUNT	

CUSTOMER SIGNATURE

FINISHED DEALER, GENERAL MANAGER OR AUTHORIZED PERSON (DATE)

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INVOICE

PAGE 2

WESTBANK
3737 Lapalco Blvd. at Woodmere · Harvey, LA 70058
Phone (504) 347-7060

SERVICE ADVISOR: 119 THERON J. GUIDRY

COLOR	YEAR	MAKE/MODEL	VIN	LICENSE	MILEAGE IN/OUT	TAG
SPRUCE GRE	98	ISUZU RODEO	4S2CK58W3W4323185		24598/24598	TB393

OIL DATE	PROD. DATE	WARR. EXP	PROMISED	PO NO.	RATE	PAYMENT	INV. DATE
31DEC97		31DEC00	WAIT 02NOV98		60.00	CASH	02NOV98

R.O. OPENED	READY	OPTIONS:
02NOV98	02NOV98	STK:46244 DLR:23I009 ENG:3.2L TRN:4A

LINE OPCODE TECH TYPE HOURS	LIST	NET	TOTAL
175 DAVIS,KEITH LIC#: 6697			
CCI		0.00	0.00

PARTS: 0.00 LABOR: 0.00 OTHER: 0.00 TOTAL LINE D: 0.00

24598 SEE LINE A

****

ON BEHALF OF SERVICING DEALER, I HEREBY CERTIFY THAT THE INFORMATION CONTAINED HEREON IS ACCURATE UNLESS OTHERWISE SHOWN. SERVICES DESCRIBED WERE PERFORMED AT NO CHARGE TO OWNER. THERE WAS NO INDICATION FROM THE APPEARANCE OF THE VEHICLE OR OTHERWISE, THAT ANY PART REPAIRED OR REPLACED UNDER THIS CLAIM HAD BEEN CONNECTED IN ANY WAY WITH ANY ACCIDENT, NEGLIGENCE OR MISUSE. RECORDS SUPPORTING THIS CLAIM ARE AVAILABLE FOR (1) YEAR FROM THE DATE OF PAYMENT NOTIFICATION AT THE SERVICING DEALER FOR INSPECTION BY MANUFACTURER'S REPRESENTATIVE

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DESCRIPTION	TOTALS
LABOR AMOUNT	0.00
PARTS AMOUNT	0.00
GAS, OIL, LUBE	0.00
SUBLET AMOUNT	0.00
MISC. CHARGES	0.00
TOTAL CHARGES	0.00
LESS INSURANCE	0.00
SALES TAX	0.00
PLEASE PAY THIS AMOUNT	0.00

SIGNED: DEALER GENERAL MANAGER OR AUTHORIZED PERSON (DATE)

CUSTOMER SIGNATURE

00000049

CUSTOMER COPY

Customer Claim Form

Case Number: ISU9885838
Contact Date : 07/20/98
Start Date :

[redacted]

Fax Number:

Evening Phone: (504) 456-2875
E-mail address :

Vehicle Information

Name(s) that appear on vehicle title: Anna Chiasson
Is Vehicle titled to a business: no
Percentage of time vehicle used for business purposes:
Number of vehicles owned or leased by the business : 0

Make: Isuzu Model: Rodeo Model Year: 1998 Current Mileage: 16000
Vehicle Identification Number: 4S2CK58W3W4323185
Selling Dealer/City/State : Same, Same
Servicing Dealer/City/State : Don Bosc Autoplex, Harvey
Insurance Carrier : State Farm Policy Number
Has vehicle been in an accident? Yes __ No X Date of accident:
Description of Damage :

Purchase/Lease Information *(complete left side if vehicle was purchased, complete right side if vehicle was leased)*

Purchase Date: 01/01/98 Mileage at purchase: 14
Purchased As : New
Is the vehicle in your possession? yes
Lienholder's Name: FORD MOTOR
Address: P.O BOX 105704
City/St/Zip: ATLANTA GA 30348
Phone: ( ) -

Lease Date: Mileage at lease:
Leased As :
Is the vehicle in your possession?
Leasing Company's Name:
Address:
City/St/Zip:
Phone:

Resolution Sought

Do something with the brakes.! - Brakes still making very loud noise - metal against metal - drive train making humming noise.

[redacted]

Signature of [redacted] program all information relating to the financing or lease of the vehicle named on this Customer Claim Form.
Return the Form to: BBB AUTO LINE, 4200 Wilson Blvd., Suite 800, Arlington Va. 22203-1838

0000050

Customer Claim Form

Customer Name: Ms Anna Chiesana

Case Number: ISU9885858

Problems	Servicing Dealer(s)	Repair Date(s)	Mileage on Date(s)	Days Out of Service
brakes-make loud (metal to metal) squealing sound				
power steering (leaking)				
drive train makes a loud noise				
fuel indicator light out-[illegible]				
generator kit-recall				
See attached				

(Place an asterisk (*) next to any current problems)

00000051

ISUZU

August 31, 1998

Campaign # 98V-170
Bulletin # SB98-04-L006

452CK58W3W4323185
[redacted]

DEAR ISUZU RODEO/AMIGO OWNER:

This notice is sent to you in accordance with the requirements of the National Traffic and Motor Vehicle Safety Act. Isuzu Motors Limited has determined that a defect which relates to motor vehicle safety exists in certain 1998 Rodeo and 1998 Amigo vehicles.

WHAT IS THE CONDITION?
On some affected vehicles, the engine wire harness ground connection terminal may fracture due to improper crimping. In cases where the terminal is fractured, the Powertrain Control Module (PCM) misinterprets this condition and cuts the fuel causing a "no-start" condition, or in the worst case, an engine stall.

WHAT WE WILL DO
To correct this condition your Isuzu dealer will install a new wire harness. This service will be performed for you at no charge.

WHAT YOU SHOULD DO
Please contact your Isuzu dealer as soon as possible to arrange a service date. Your dealer will need a few days notice and the Vehicle Identification Number (VIN), as shown in the top left hand corner of this letter, to coordinate parts delivery and service schedules. Instructions for making this correction have been sent to your Isuzu dealer. The length of time required to perform this correction is approximately 30 minutes. Please ask your dealer if you wish to know how much additional time will be needed to schedule and process your vehicle. Presentation of this letter to your dealer will assist in making the necessary correction in the shortest possible time. Please have your dealer refer to Campaign Bulletin **SB98-04-L006**. To locate the Isuzu dealer nearest you, or if you have any questions regarding this matter, please call the Isuzu Care Team Line at **1-800-643-4070 ext. 299**.

Your Isuzu dealer is best equipped to obtain parts and provide service to ensure that your vehicle is corrected as promptly as possible. If you believe that the condition has not been or cannot be remedied without charge within a reasonable time, you may contact the National Owner Relations Department, American Isuzu Motors Inc., P.O. Box 995, Whittier, CA, 90608-0995, or call the Isuzu Care Team Line at **1-800-643-4070 ext. 299**.

If After contacting your Isuzu dealer, the National Office or the Isuzu Care Team Line, with problems about this recall you are still not satisfied that we have done our best to remedy this condition without charge and within a reasonable time, you may wish to write the Administrator, National Highway Traffic Safety Administration, 400 Seventh Street S. W., Washington, D.C. 20590; or call 1-800-424-9393 (Washington, D. C. residents can call (202) 366-0123).

We are sorry to cause you this inconvenience; however, in the interest of your safety, it is very important that your vehicle be returned to your Isuzu dealer as soon as possible for repair.

Sincerely,

AMERICAN ISUZU MOTORS INC.

IMPORTANT: *If you have sold or traded your Isuzu vehicle, please enter the owner's name and address, if known, on the enclosed "Change of Information" postcard and drop it in the mail. Postage has already been paid. We will contact the new owner.*

00000052

American Isuzu Motors Inc.
2300 Felmer Place
P.O. Box 995
Whittier, California 90608-0995

[redacted]

[redacted]

DUPLICATE
PAGE 2

3737 [illegible]

SERVICE ADVISOR: 139 MICHAEL [illegible]

[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
SPRUCE GRE 98	ISUZU RODEO		4S2CK58W3W4323185			17605/17605 [illegible]

OR DATE	PROD. DATE	WARR. EXP.	PROMISED	PO NO.	RATE	PAYMENT	INV. DATE
31DEC97		31DEC00	17:30 13AUG98		60.00	CASH	13AUG98

PRO OPENED	READY	OPTIONS: STK:46244 DLR:23I009 ENG:3.2L TRN:4A
05AUG98	13AUG98	

LINE OPCODE TECH TYPE HOURS LIST NET [illegible]

069902 REPLACE BOTH SIDES FRONT BRAKE DISC
163 WI94 (N/C)
2 8-97096-395-0 ROTOR; DISC BR (N/C)
1 5-87831-723-0 SHOE KIT; BRAK (N/C)
1 OVERNIGHT (N/C)
2 8-94407-711-0 SEAL;OIL,FRT A (N/C)
1 #6AZ*2C410*AB BRAKE CLEANER (N/C)
1 8-97120-770-0 RING; SNAP (N/C)
1 8-97131-748-0 PAD KIT;CALIPE (N/C)
099904 REPLACE BOTHSIDES REAR DRUM BRAKE SHOES
163 WI94 (N/C)
099905 MACHINE REAR DRUMS
163 WI94 (N/C)
FC: PART#: COUNT:
CLAIM TYPE:
AUTH CODE:

PARTS: 0.00 LABOR: 0.00 OTHER: 0.00 TOTAL LINE C: 0.00

NORMAL OPERATION FOR METALIC PADS ZSPM TOM HILTZ GOODWILLED THE PADS, NEW ROTORS AND UPDATED REAR SHOESD FROM ISUZU DUE TO PREVIOUS REPAIRS. THIS IS GOODWILL FROM ISUZU AND NOT A MANUFACTURES DEFECT. THE NEW SHOES USED IN THE REPAIR ARE UPDATED FROM ISUZU.

****

D ALTERNATE TRANSPORTATION PROVIDED BY THE VEHICLE MANUFACTURE
TRANSPORTATION PROGRAM
I INFORMATION
163 CCI 0.00 0.00
PARTS: 0.00 LABOR: 0.00 OTHER: 0.00 TOTAL LINE D: 0.00

17605 .

****

E** VEHICLE DRIFTS RIGHT
060165 FRONT END ALIGNMENT (ADJUST SUSPENSION)

ON BEHALF OF SERVICING DEALER, I HEREBY CERTIFY THAT THE INFORMATION CONTAINED HEREON IS ACCURATE UNLESS OTHERWISE SHOWN. SERVICES DESCRIBED WERE PERFORMED AT NO CHARGE TO OWNER. THERE WAS NO INDICATION FROM THE APPEARANCE OF THE VEHICLE OR OTHERWISE, THAT ANY PART REPAIRED OR REPLACED UNDER THIS CLAIM HAD BEEN CONNECTED IN ANY WAY WITH ANY ACCIDENT, NEGLIGENCE OR MISUSE. RECORDS SUPPORTING THIS CLAIM ARE AVAILABLE FOR (1) YEAR FROM THE DATE OF PAYMENT NOTIFICATION AT THE SERVICING DEALER FOR INSPECTION BY MANUFACTURER'S REPRESENTATIVE.

STATEMENT OF DISCLAIMER
The factory warranty constitutes all of the warranties with respect to the sale of this item/items. The dealer hereby expressly disclaims all warranties either expressed or implied, including any implied warranty or merchantability or fitness for a particular purpose. Dealer neither assumes nor authorizes any other person to assume for it any liability in connection with the sale of this item/items.

DESCRIPTION	TOTALS
LABOR AMOUNT	
PARTS AMOUNT	
GAS, OIL, LUBE	
SUBLET AMOUNT	
MISC. CHARGES	
TOTAL CHARGES	
LESS INSURANCE	
SALES TAX	
PLEASE PAY THIS AMOUNT	

(SIGNED) DEALER, GENERAL MANAGER OR AUTHORIZED PERSON (DATE)

CUSTOMER SIGNATURE

00000053

CUSTOMER COPY

70001338

162258

INVOICE

[redacted]

PAGE 1

3737 Lapalco Blvd. at Woodmere · Harvey, LA 70058
Phone (504) 347-7000

SERVICE ADVISOR: 119 THERON J. GUIDRY

COLOR	YEAR	MAKE/MODEL	VIN	LICENSE	MILEAGE IN/OUT
SERVICE GRE	98	ISUZU RODEO	4S2CK58W3W4323185		14813/14813

DELDATE	PROD. DATE	WARR. EXP.	PROMISED	PO NO.	RATE	PAYMENT	INV.
31DEC97		31DEC00	13:30 18JUN98		60.00	CASH	30JUN98

R.O. OPENED	READY
16JUN98	30JUN98

OPTIONS: STK:46244 DLR:231009 ENG:3.2L TRN:4A

LINE OPCODE TECH TYPE HOURS LIST NET TOTAL

A INSTALL SOP - RECALL PARTS

090744 PERFORM ABS MODULE RECALL
173 CANSELO,JEROME LIC#: 0244
WI94
1 2-90028-700-0 LABEL; RECALL (N/C)
040112 REPLACE ALTERNATOR (N/C)
173 CANSELO,JEROME LIC#: 0244
WI94
1 2-90000-810-0 GENERATOR KIT (N/C)
1 8-97130-776-0 GENERATOR ASM (N/C)
(N/C)

PARTS: 0.00 LABOR: 0.00 OTHER: 0.00 TOTAL LINE A: 0.00

14813 PERFORM RECALL #960912 AND RECALL #960413

****

B BRAKE PEDAL GOES TO FLOOR AFTER BRAKE JOB WAS DONE - ADVISE
2001A2 REAR WHEEL CYLINDER (2262/2261) - REPLACE
ONE
173 CANSELO,JEROME LIC#: 0244
WI94
1 8-97127-616-0 CYLINDER; WHEE (N/C)
(N/C)
FC: PART#: COUNT:
CLAIM TYPE:
AUTH CODE:

PARTS: 0.00 LABOR: 0.00 OTHER: 0.00 TOTAL LINE B: 0.00

14813 CK BRAKE PEDAL GOES TO FLOOR, CK BRAKE SYSTEM FOUND LEAK AT RIGHT REAR WHEEL CYL. REPLACE RIG HT REAR WHEEL CYL BLEED SYSTEM TEST OK. WARRANTY

****

C** RENTAL SUPPLIED BY ENTERPRISE LEASING...
I INFORMATION
173 CANSELO,JEROME LIC#: 0244
CCI

0.00 0.00

ON BEHALF OF SERVICING DEALER, I HEREBY CERTIFY THAT THE INFORMATION CONTAINED HEREON IS ACCURATE UNLESS OTHERWISE SHOWN. SERVICES DESCRIBED WERE PERFORMED AT NO CHARGE TO OWNER. THERE WAS NO INDICATION FROM THE APPEARANCE OF THE VEHICLE OR OTHERWISE, THAT ANY PART REPAIRED OR REPLACED UNDER THIS CLAIM HAD BEEN CONNECTED IN ANY WAY WITH ANY ACCIDENT, NEGLIGENCE OR MISUSE. RECORDS SUPPORTING THIS CLAIM ARE AVAILABLE FOR (1) YEAR FROM THE DATE OF PAYMENT NOTIFICATION AT THE SERVICING DEALER FOR INSPECTION BY MANUFACTURER'S REPRESENTATIVE

STATEMENT OF DISCLAIMER

The factory warranty constitutes all of the warranties with respect to the sale of the merchandise. The Seller hereby expressly disclaims all warranties, either express or implied, including any implied warranty of merchantability or fitness for a particular purpose. Seller neither assumes nor authorizes any other person to assume for it any liability in connection with the sale of the merchandise.

DESCRIPTION	TOTALS
LABOR AMOUNT	
PARTS AMOUNT	
GAS, OIL, LUBE	
SUBLET AMOUNT	
MISC. CHARGES	
TOTAL CHARGES	
LESS INSURANCE	
SALES TAX	
PLEASE PAY THIS AMOUNT	

SIGNED: DEALER, GENERAL MANAGER OR AUTHORIZED PERSON DATE:

CUSTOMER SIGNATURE

00000004

[redacted]

DUPLICATE

SERVICE ADVISORS: 139 MICHAEL

SPRUCE GRE 98	ISUZU RODEO		4S2CK58W3W4323185			17605	
DEL DATE	PROD. DATE	WARR. EXP.	PROMISED	PO NO.	RATE	PAYMENT	
31DEC97		31DEC00	17:30 13AUG98		60.00	CASH	13AUG98
H.O. OPENED		READY	OPTIONS: STK:46244 DLR:23I009 ENG:3.2L TRN:4A				
05AUG98		13AUG98					

LINE OPCODE TECH TYPE HOURS LIST NET TOTAL

A GAS PEDAL BROKEN OFF

020101 REPLACE FUEL PEDAL

163 WI94 (N/C)

1 8-97145-918-0 PAD; PEDAL, AC (N/C)

1 OVERNIGHT (N/C)

FC: PART#: COUNT:

CLAIM TYPE:

AUTH CODE:

PARTS: 0.00 LABOR: 0.00 OTHER: 0.00 TOTAL LINE A: 0.00

17605 REPLACE GAS PEDAL

****

B POWER STEERING LEAKING. REPLACE VERSUS REPAIR POWER STEERING RACK AS PER ZSPM

100367 REPLACE STEERING RACK

163 WI94 (N/C)

1 8-97124-925-0 STEERING UNIT (N/C)

1 FREIGHT (N/C)

1 1050017 P/S FLD (N/C)

FC: PART#: COUNT:

CLAIM TYPE:

AUTH CODE:

PARTS: 0.00 LABOR: 0.00 OTHER: 0.00 TOTAL LINE B: 0.00

17605 REMOVE SKID PLATE TO REMOVE AND REPLACE POWER STEARING RACK FILL WITH FULID EVERYTHING OK THE CUSTOMER HAS HAD PREVIOUS COMPLAINTS ABOUT THE POWER STEERING FLUID LEAKING. ZSPM DECIDED TO REPLACE VERSUS REPAIR AS A GOODWILL OFFERING.

****

C HIGH PITCH BRAKE SQUEEL IS NORMAL OPERATION. (ZSPM TO GOODWILL NEW ROTORS, PADS AND SHOES DUE TO PREVIOUS REPAIRS. REPLACE WITH IMPROVED SHOES ON THE REAR FROM ISUZU AS PER ZSPM

ON BEHALF OF SERVICING DEALER, I HEREBY CERTIFY THAT THE INFORMATION CONTAINED HEREON IS ACCURATE UNLESS OTHERWISE SHOWN. SERVICES DESCRIBED WERE PERFORMED AT NO CHARGE TO OWNER. THERE WAS NO INDICATION FROM THE APPEARANCE OF THE VEHICLE OR OTHERWISE, THAT ANY PART REPAIRED OR REPLACED UNDER THIS CLAIM HAD BEEN CONNECTED IN ANY WAY WITH ANY ACCIDENT, NEGLIGENCE OR MISUSE. RECORDS SUPPORTING THIS CLAIM ARE AVAILABLE FOR (1) YEAR FROM THE DATE OF PAYMENT NOTIFICATION AT THE SERVICING DEALER FOR INSPECTION BY MANUFACTURER'S REPRESENTATIVE

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DESCRIPTION	TOTALS
LABOR AMOUNT	
PARTS AMOUNT	
GAS, OIL, LUBE	
SUBLET AMOUNT	
MISC. CHARGES	
TOTAL CHARGES	
LESS INSURANCE	
SALES TAX	
PLEASE PAY THIS AMOUNT	

(SIGNED) DEALER, GENERAL MANAGER OR AUTHORIZED PERSON (DATE)

CUSTOMER SIGNATURE

00000055

CUSTOMER COPY

70001338

[redacted]

INVOICE

PAGE 1

[redacted]

3737 Lapalco Blvd. at Woodmere · Harvey, LA 70058
Phone (504) 347-7000

SERVICE ADVISOR: 119 THERON J. GUIDRY

MODEL	YEAR	MAKE/MODEL	VIN	LICENSE	MILEAGE IN/OUT	TAG
SPRUCE GRE	98	ISUZU RODEO	4S2CK58W3W4323185		25839/25839	T325

SEL.DATE	PROD.DATE	WARR.EXP	PROMISED	PO NO.	RATE	PAYMENT	INVDATE
31DEC97		31DEC00	07:54 17NOV98		60.00	CASH	18NOV98

RO OPENED	READY	OPTIONS: STK:46244 DLR:231009 ENG:3.2L TRN:4A
16NOV98	18NOV98	

LINE OPCODE TECH TYPE HOURS LIST NET TOTAL

A TRANSMISSION LEAKING FLUID
UTV OUR TECHNICIANS HAVE BEEN UNABLE TO VERIFY
YOUR CONCERN. PLEASE INFORM US IT THE
CONCERN RETURNS AS QUICKLY AS POSSIBLE
175 DAVIS,KEITH LIC#: 6697
CPI 0.00 0.00

PARTS: 0.00 LABOR: 0.00 OTHER: 0.00 TOTAL LINE A: 0.00

25839 INSPECT UNDERNEATH VEHICLE FOR LEAKS FOUND NO LEAKS
****

B RATTLE UNDERNEATH CAR OVER BUMPS
030303 REPLACE EXHAUST PIPE WITH SILENCER
(RESONATOR).
175 DAVIS,KEITH LIC#: 6697
WI94 (N/C)
1 8-97140-699-1 SILENCER ASM, (N/C)
2 8-97148-757-1 GASKET, SILENC (N/C)

PARTS: 0.00 LABOR: 0.00 OTHER: 0.00 TOTAL LINE B: 0.00

25839 CHECK VEHICLE FOR RATTLE FOUND BAFFLE IN MUFFLER MAKING NOISE
REPLACE MUFFLER AND RETEST OK
****

ON BEHALF OF SERVICING DEALER, I HEREBY CERTIFY THAT THE INFORMATION CONTAINED HEREON IS ACCURATE UNLESS OTHERWISE SHOWN. SERVICES DESCRIBED WERE PERFORMED AT NO CHARGE TO OWNER. THERE WAS NO INDICATION FROM THE APPEARANCE OF THE VEHICLE OR OTHERWISE, THAT ANY PART REPAIRED OR REPLACED UNDER THIS CLAIM HAD BEEN CONNECTED IN ANY WAY WITH ANY ACCIDENT, NEGLIGENCE OR MISUSE. RECORDS SUPPORTING THIS CLAIM ARE AVAILABLE FOR (1) YEAR FROM THE DATE OF PAYMENT NOTIFICATION AT THE SERVICING DEALER FOR INSPECTION BY MANUFACTURER'S REPRESENTATIVE.

SIGNATURE DEALER, GENERAL MANAGER OR AUTHORIZED PERSON DATE

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CUSTOMER SIGNATURE

DESCRIPTION	TOTALS
LABOR AMOUNT	0.00
PARTS AMOUNT	0.00
GAS, OIL, LUBE	0.00
SUBLET AMOUNT	0.00
MISC. CHARGES	0.00
TOTAL CHARGES	0.00
LESS INSURANCE	0.00
SALES TAX	0.00
PLEASE PAY THIS AMOUNT	0.00

00000056

CUSTOMER COPY

[illegible]JUN98 PARTS SPECIAL ORDER NOTICE: 16225[illegible]

[illegible]
3[illegible] CAPELLO BLVD.
HARVEY, LA. 70058

[illegible]
Invoice/[illegible]: 16225[illegible]
Vehicle ID: W4223165
Customer #: 70001338
Home Phone: 5044562975
Work Phone: 5042638721
Customer PO #:

COMMENT: S[redacted]

NAME: [redacted]

[illegible]	[illegible]	DESCRIPTION: OWNER INFORMATION	RECEIVED	[illegible]
1	[illegible]	CYLINDER: WHEE16JUN98	19JUN98	204

[illegible] necessary for us to SPECIAL order the [illegible] for you.
** THESE PARTS WILL BE RETURNED TO THE MANUFACTURER IN [illegible] DAYS **

00000057

04JUN98 PARTS SPECIAL ORDER NOTICE: 161212 Page: 1

HON BOHN AUTOPLEX INC.
3737 LAPALCO BLVD.
HARVEY, LA. 70058

Dealer Phone:
Invoice/RO#: 161212
Vehicle ID: W4323195
Customer #: 70001338
Home Phone: 5044562875
Work Phone: 5042638521
Customer PO #:

COMMENT: S 119 W 25JUN98

NGM [redacted]

QTY	PART NUMBER	DESCRIPTION	ORDER INFORMATION	RECEIVED	EMP
[illegible]	2-90000-810-0	GENERATOR KIT	04JUN98	08JUN98	204
1	8-97130-776-0	GENERATOR ASM	04JUN98	08JUN98	204
1	2-90028-700-0	LABEL; RECALL	04JUN98	12JUN98	204

00000058

SPECIAL order the above [illegible]

RECEIVED

98 DEC 23 PM 1:35

543203

STATE OF NEW YORK
OFFICE OF THE ATTORNEY GENERAL

DENNIS C. VACCO
Attorney General

PAMELA JONES HARBOUR
Deputy Attorney General

(518) 474-5481

December 16, 1998

COPIED

RE: OUR FILE NO.: 98R14142
SUBJECT: NEIL HONDA HYUNDAI ISUZU AT HEMPSTEAD

Dear Sir or Madam:

On behalf of Attorney General Dennis Vacco, we are writing to notify you that we have received your correspondence.

We appreciate your alerting us to this matter. We believe the organization shown below may be able to assist you and we are forwarding your correspondence there.

That office will contact you in the near future.

Very truly yours,

Brian Butler

Brian Butler
Senior Consumer Frauds Representative
Consumer Frauds And Protection Bureau

Encl.
cc: National Highway Traffic Safety Administration
U.S. Department of Transportation
Washington, DC 20590

00000059

S.S.

ATTORNEY GENERAL DENNIS C. VACCO
STATE OF NEW YORK
OFFICE OF THE ATTORNEY GENERAL
BUREAU OF CONSUMER FRAUDS AND PROTECTION
The Capitol
Albany, NY 12224-0341
Tel. (518) 474-5481 Fax (518) 474-3618

COMPLAINT FORM

Consumer Hotline 1 (800) 771-7755 For Hearing Impaire
http://www.oag.state.ny.us Attorney Gen

DEC 07 1998
Albany, New York

1. PLEASE BE SURE TO COMPLAIN TO THE COMPANY OR INDIVIDUAL BEFORE FILING.
2. PLEASE TYPE OR PRINT CLEARLY IN DARK INK.
3. YOU MUST COMPLETE THE ENTIRE FORM. INCOMPLETE OR UNCLEAR FORMS WILL BE RETURNED TO YOU.
4. MAKE SURE YOU ENCLOSE COPIES OF IMPORTANT PAPERS CONCERNING YOUR TRANSACTION.

CONSUMER

Y:

ST:

CI

COMPLAINT

NAME OF SELLER OR PROVIDER OF SERVICES: Neil Honda Hyundai Isuzu at Hempstead	NAME OF OTHER SELLER OR PROVIDER OF SERVICES:
STREET ADDRESS: 117 N. Franklin Street	STREET ADDRESS:
CITY/TOWN: Hempstead STATE: N.Y. ZIP: 11550	CITY/TOWN: STATE: ZIP:
TELEPHONE NUMBER: (516) 481-2800	TELEPHONE NUMBER:

DATE OF TRANSACTION: Oct. 7 1998
COST OF PRODUCT OR SERVICE: $23,642.00
HOW PAID (Check those which apply): ☐ Cash ☒ Check ☐ Credit Card ☐ Other Finance CK - 15,118.35 - 10,669.32

DID YOU SIGN A CONTRACT? ☒ Yes ☐ No
WHERE DID YOU SIGN THE CONTRACT? Neil Honda Hyundai Isuzu - Hempstead N.Y.
DATE SIGNED: Oct. 9, 1998

WAS PRODUCT OR SERVICE ADVERTISED? ☒ Yes ☐ No
WHERE WAS IT ADVERTISED? Newsday - News paper
DATE ADVERTISED: Oct. 4, 1998

TYPE OF COMPLAINT (e.g. car, mail order, etc. Use the reverse side of this form to provide details): SUV - Auto

DATE YOU COMPLAINED TO THE COMPANY OR INDIVIDUAL: Yes Nov. 9 1998 ☐ By Mail ☐ By Telephone ☒ In Person
PERSON CONTACTED: MR. Chris O'Brian
JOB TITLE: Service Manager

NATURE OF RESPONSE: Held and tested the vehicle for 2 weeks
DATE OF RESPONSE: November 20, 1998

HAS MATTER BEEN SUBMITTED TO ANOTHER AGENCY OR ATTORNEY? (If "Yes," give name and address) ☐ Yes ☒ No

IS COURT ACTION PENDING? (Please describe as necessary) ☐ Yes ☒ No

ADDITIONAL INFORMATION

MANUFACTURER OF PRODUCT: American Isuzu Motors Inc	PRODUCT MODEL OR SERIAL NUMBE: 4S2CM58W1W4361668
ADDRESS: 2300 Peltissier Place Whittier, Calif 90601-1587	WARRANTY EXPIRATION DATE: Oct. 9, 2001

DID BUSINESS ARRANGE FINANCING? (If "Yes," give name and address of bank or finance company) ☒ Yes ☐ No North Fork Bank, PO Box 159, Laurel NY

PLEASE DESCRIBE COMPLAINT ON REVERSE SIDE

000000

CNS 001A (3/98)

ISUZU

November 19, 1998

Dear Mr.

Thank you for your November 19, 1998 letter regarding your 1998 Isuzu Rodeo. Needless to say, we regret to learn of the circumstances that have prompted this exchange of correspondence.

At the outset, we would like to assure you that owner satisfaction is of primary importance to everyone connected with American Isuzu Motors Inc. In this regard, we are always eager to assist Isuzu owners whenever possible. However, the circumstances of this case prevent our doing so.

Mr. Moreno, please understand that any alleged incident, such as the one described in your letter, should be reported to your insurance company so they may review and investigate the cause of the alleged occurrence. Therefore, we must refer you to your insurance carrier to investigate and manage this matter further.

We regret that our reply could not be more favorable and hope this explanation aids in your understanding of our position in this matter. We thank you for this opportunity to review and comment.

Sincerely,

Kathryn A. Guenther
Customer Relations Representative

98314055/04

cc: Northeast Regional Office

00000061

American Isuzu Motors Inc.
2300 Pellissier Place
Whittier, California 90601-1587

562 699-0500
562 692-7135 FAX

We're looking to the future by recycling today.

RETAIL INSTALMENT CONTRACT

Meaning Of Some Words: In this Contract, the words "I," "me" "we" and "my" mean anyone signing this Contract as a Buyer. The words "you" and "your" mean the Seller or, after the Seller transfers its rights under this Contract, anyone having those rights.

ANNUAL PERCENTAGE RATE The cost of my credit as a yearly rate.	FINANCE CHARGE The dollar amount the credit will cost me.	Amount Financed The amount of credit provided to me or on my behalf.	Total of Payments The amount I will have paid after I have made all scheduled payments.	Total Sale Price The total cost of my purchase on credit, including my downpayment
8.65 %	$ 2510.68	$ 10669.52	$ 13180.20	of $ 15118.85 $ 28299.05

My Payment Schedule will be: e means estimate

No. of Payments	Amount of Payments	When Payments Are Due
60	$ 219.67	Monthly, beginning NOV. 6th, 19 98
	$ N/A	Final Payment Due

Security: I am giving a security interest in the motor vehicle being purchased.
Filing Fees: $ N/A
Late Charge: If a payment is late more than 10 days, I will be charged 5% of the payment.
Prepayment: If I pay off early, I will not have to pay a penalty.

My Contract documents will have additional information about nonpayment, default, any required repayment in full before the scheduled date and prepayment refunds and penalties.

In this Contract,
you are the Seller. NEIL HONDA HYUNDAI ISUZU AT HEMPSTEAD
117 N. FRANKLIN STREET HEMPSTEAD NY 11550
Name Address Zip Code

This Contract is between Seller and Buyer. All disclosures have been made by Seller. Seller intends to assign this Contract.

We are the Buyer(s). Name(s) Address(es) Zip Code(s)

If there is more than one Buyer, each of us will be obligated, separately and together, for all sums due you and the performance of all agreements as provided in this Contract.

Description of Vehicle: (See Insurance Requirements section)

N/U	Year and Make	Series	Body Style	No. Cyl.	Truck Ton Capacity	Serial Number
	NEW 1999 ISUZU RODEO 4DR 6					4S2CH58W1W4361668

Equipped with: __A.T. __P.S. __AM-FM Radio __A.C. __P.B. __P.W. Other _____

I have traded in the following vehicle: _____ Year and Make _____ Series $ N/A Gross − $ N/A Still Owing = $ N/A Net Trade-In

Net Trade-In $ N/A Cash Downpayment $ 15118.85 Total Downpayment = $ 15118.85

Property Insurance: I am required to obtain and maintain insurance on the Vehicle, endorsed to protect you as loss-payee, BUT I MAY CHOOSE THE AGENT OR BROKER OF MY CHOICE.

TITLE HOLDER OF COLLATERAL: NORTH FORK BANK REGISTRANT: __

PHYSICAL DAMAGE: Comprehensive $ N/A, deductible. Collision $ N/A deductible.

INSURANCE COMPANY: _____ Policy Number: _____ Effective Date _____

AGENT: Name _____ Address _____ Telephone Number: _____

I guarantee that the required insurance coverage as shown in the Insurance Requirements section was obtained from the agent named above.

Liability insurance coverage for bodily injury and property damage is not included or provided for in this Contract.

Vendor's Single Interest Insurance: If this box is checked X, you require Vendor's Single Interest Insurance. I may choose the person through whom Vendor's Single Interest Insurance is to be obtained. This insurance is for the sole protection of the Assignee and any interest is not covered. If obtained through you, the cost of such insurance is $ $40.00

Promise to Pay: I agree to purchase the Vehicle described above and to make payments in accordance with the payment schedule described above. Payments are due on or before the same day of each month as the first payment date. Payments must be made at any office of the party to whom the Seller transfers its rights under this Contract, which will sometimes be called the "Assignee," or sent to any other address designated by the Assignee. If no Assignee identified on this Contract, I agree to make or send my payments to the address designated by you or the Assignee in some future written notice.

NORTH FORK BANK, 245 Love Lane, Mattituck, NY 11952 (the "Assignee")

Acct No. _____
Date OCT 7th, 19 98
*You may be retaining a portion of these amounts.

Itemization of Amount Financed	
Cash Price	$ 23642.00
Total Downpayment	−$ 15118.85
Unpaid Balance of Cash Price	1 =$ 8523.15
To Credit Insurance Company*	2 +$ N/A
To Property Insurance Company*	3 +$ N/A
To Public Officials	4 +$ 98.50
To Service Contracts*	5 +$ N/A
To Vendor's Single Interest Insurance	6 +$ 40.00
To NYS SALES TAX *	7 +$ 2007.87
Amount Financed (1 thru 7)	=$ 10669.52

REQUEST AND SCHEDULE OF GROUP INSURANCE

I understand that Group Credit Life Insurance and Group Credit Accident and Health Insurance are voluntary and are not required to obtain this loan. I further understand that I may select another insurer to provide this coverage. If I choose to become insured, I understand that insurance will be provided in accordance with the certificate of group insurance that will be given to me. I also reserve the right to terminate my coverage at any time by notifying you in writing. The cost of insurance for the entire term of this Contract is shown below.

__ I WANT optional Group Credit Life Insurance. $ N/A
__ WE WANT optional Group Credit Joint Life Insurance. $ N/A
__ I WANT optional Group Accident and Health Insurance. $ N/A

Insured Buyer's present age _____
Insured Co-Buyer's present age _____

0000062

NEIL HONDA

ISUZU HYUNDAI

117 N. Franklin St., Hempstead, N.Y. 11550 • (516) 481-2800

FAX# 481-2197

CUSTOMER NO.	ADVISOR	TAG NO.	INVOICE DATE	INVOICE NO.
17800	DONOVAN GRANT 134	998	10/26/98	ISCS15698

LABOR RATE	LICENSE NO.	MILEAGE	COLOR	STOCK NO.
		1317	BRT SILVER	3033

YEAR / MAKE / MODEL	DELIVERY DATE	DELIVERY MILES
98/ISUZU/RODEO/4DR S AUTO 4WD	10/13/98	

VEHICLE ID. NO.	SELLING DEALER NO.	PRODUCTION DATE
4S2CM58W1W4361688		

P. T. E. NO.	P. O. NO.	R. O. DATE
		10/26/98

BUSINESS PHONE

COMMENTS

MO: 1319

LABOR & PARTS----------

J# 1 23ISZDOOR DOOR/LOCK REPAIRS TECH(S):147 WARRANTY

R/F DOOR DOES NOT OPEN FROM INSIDE
R&R R/F DOOR PANEL FOUND DOOR LOCK LICK BROKE LOOSE
LOP--112917--.5--CODE 36
NECC. TO RESECURE DOOR LOCK LINK--DOOR OPEN FROM INSIDE
NOW

JOB # 1 TOTAL LABOR & PARTS 0.00

J# 2+23ISZINTRIM INTERIOR TRIM TECH(S):147 WARRANTY

CUSTOMER FOUND CLIP UNDER L/F DASH
CK AND FOUND CLIP CAME FROM BEHINE CLUSTER--HARNESS CLIP
LOP--114101---1.5---CODE 36
NECC. TO R&R CLUSTER TO REINSTALL HARNESS CLIP

JOB # 2 TOTAL LABOR & PARTS 0.00

J# 3+17ISZ1 DIAGNOSE SUSPENSION TECH(S):147 0.00

CUSTOMER STATES HEAR RUBBING NOISE FROM FRONT WHEELS ON TURN
ROADTEST AND CK FOR NOISE--
CANNOT DUPLICATE CUSTOMER COMPLAINT

JOB # 3 TOTAL LABOR & PARTS 0.00

TECHNICIAN CERTIFICATION----------

147 OSCAR A MORENO 664E

TOTALS----------

[ ] CASH [ ] VISA [ ] AMEX [ ] MASTER CARD

[ ] DISCOVER [ ] CHARGE [ ] CHECK [#]

Thank you for your business!!

Neil Honda utilizes a variable labor rate which can vary from $63.00 to $80.00 depending on the type of work performed.

TOTAL LABOR....	0.00
TOTAL PARTS....	0.00
TOTAL SUBLET...	0.00
TOTAL G.O.G....	0.00
TOTAL MISC CHG.	0.00
TOTAL MISC DISC	0.00
TOTAL TAX.....	0.00
TOTAL INVOICE $	0.00

CUSTOMER SIGNATURE

00000063

ANY WARRANTIES ON THE PRODUCT SOLD HEREBY ARE THOSE MADE BY THE MANUFACTURER. THE SELLER HEREBY EXPRESSLY DISCLAIMS ALL WARRANTIES, EITHER EXPRESS OR IMPLIED, INCLUDING ANY IMPLIED WARRANTY OF MERCHANTABILITY OR FITNESS FOR A PARTICULAR PURPOSE, AND NEITHER ASSUMES NOR AUTHORIZES ANY OTHER PERSON TO ASSUME FOR IT ANY LIABILITY IN CONNECTION WITH THE SALE OF SAID PRODUCTS.

ALL ORIGINAL EQUIPMENT PARTS AND RELATED LABOR WARRANTED FOR 12 MONTHS OR 12,000 MILES WHICHEVER OCCURS FIRST. ALL OTHER PARTS AND LABOR WARRANTED FOR 90 DAYS OR 4,000 MILES WHICHEVER OCCURS FIRST. ALL PARTS NEW UNLESS OTHERWISE NOTED.

TERMS: CASH OR CERTIFIED CHECK ONLY

X

CUSTOMER ACKNOWLEDGES RECEIPT OF COPY.

November 9 - Returned the Vehicle - 0 Amps

Thank You for this opportunity to serve you.

NYS-MV R/S REG. NO. 707 9261

11/10/98 Marius will contact C O'Brien to see what is happen

Called - 11/17/9 American Isuzu Calif

11/17 - Called [illegible]

Claim # 2003

PAGE 1 OF 1 ACCOUNTING COPY [END OF INVOICE] 13:54:27

481-5791 11/13/78

To Chris O'Brien
Service Manager

From

Chris please review. ~~and~~
with all the problems
listed I sure cannot
tell me that there is
nothing wrong with my
truck.

Thank you

10 Pages

00000061

Office of Defects Investigation

Investigations Database

Call the **Auto Safety Hotline** toll free at (888) 327-4236 to report safety defects or to obtain information on cars, trucks, child seats, highway or traffic safety.

Report Date: November 11, 1998 11:00:09 AM

NHTSA Action Number: PE98051
Make: ISUZU TRUCK
Model: RODEO
Year: 1998
Component: BRAKES:SERVICE BRAKES
Manufacturer: ISUZU MOTOR, LIMITED
Date Investigation Opened: Wed, September 23, 1998
Date Investigation Closed:
NHTSA Recall Campaign Number:
Summary: BRAKING SYSTEM/ABS

NHTSA Action Number: PE98054
Make: ISUZU TRUCK
Model: RODEO
Year: 1998
Component: POWER TRAIN
Manufacturer: ISUZU MOTOR, LIMITED
Date Investigation Opened: Fri, October 09, 1998
Date Investigation Closed:
NHTSA Recall Campaign Number:
Summary: BROKEN ACCELERATOR PEDAL

This search returned 2 records.

New Search
Return to Safety Problems and Issues

00000065

ODI ID: 825685
Make: ISUZU TRUCK
Model: RODEO
Year: 1998
Date of Failure: Tuesday, January 20, 1998

Incident: No
Fire: No
Number of Injuries: 0
Component: BRAKES:HYDRAULIC:ANTI-SKID SYSTEM
Summary: THE ABS LIGHTS COMES ON, THERE IS A LOUD SQUEALLING NOISE THAT COMES FROM THE FRONT AND REAR BRAKES. DRIVING ON REGULAR ROAD SURFACE THE BRAKE PEDAL MOVES AND V

ODI ID: 826395
Make: ISUZU TRUCK
Model: RODEO
Year: 1998
Date of Failure: Saturday, August 01, 1998
Incident: No
Fire: No
Number of Injuries: 0
Component: BRAKES:HYDRAULIC:ANTI-SKID SYSTEM
Summary: PULLING INTO PARKING LOT AT APPROXIMATELY 10 MPH, BRAKE FAILURE OCCURRED ,FELT PEDAL GO TO FLOOR, TWO JERKING MOTIONS, CAUSING CONSUMER TO HIT A POLE. RESULTING

ODI ID: 826603
Make: ISUZU TRUCK
Model: RODEO
Year: 1998
Date of Failure:
Incident: No
Fire: No
Number of Injuries: 0
Component: BRAKES:HYDRAULIC:ANTI-SKID SYSTEM
Summary: ABS BRAKES: WHEN APPLYING BRAKES IN A PANIC STOP, THE PEDAL GOES TO THE FLOOR AND BRAKES FAILS TO STOP THE VEHICLE. PLEASE PROVIDE DETAILS. THANK

ODI ID: 827702
Make: ISUZU TRUCK
Model: RODEO
Year: 1998
Date of Failure: Tuesday, September 08, 1998
Incident: No
Fire: No
Number of Injuries: 0
Component: BRAKES:HYDRAULIC:ANTI-SKID SYSTEM
Summary: WHEN CONSUMER IS DRIVING AND STEPS ON BRAKES, THE ANT-LOCK BRAKES JUST LOCK UP. *AK

ODI ID: 828473
Make: ISUZU TRUCK
Model: RODEO
Year: 1998
Date of Failure: Wednesday, September 23, 1998
Incident: No
Fire: No
Number of Injuries: 0
Component: BRAKES:HYDRAULIC SYSTEM
Summary: AFTER APPLYING THE BRAKES THE VEHICLE WILL JERK AND STOP WITHIN A COUPLE OF FEET OF DISTANCE. DEALER WAS CONTACTED. *AK

ODI ID: 825250
Make: ISUZU TRUCK
Model: RODEO
Year: 1998
Date of Failure: Friday, July 03, 1998
Incident: No
Fire: No
Number of Injuries: 0
Component: STRUCTURE:DOOR ASSEMBLY:HINGE AND ATTACHMENTS
Summary: PASSENGER'S SIDE FRONT DOOR FELL OFF HINGES. CAUSING THE DOOR TO BECOME INOPERATIVE/DOOR JAMMED. CANNOT OPEN DOOR FROM EITHER INSIDE OR OUTSIDE. DEALER SENT VEH

Had problems with door

Screw hold harm under Drive Se

ODI ID: 825422
Make: ISUZU TRUCK
Model: RODEO
Year: 1998
Date of Failure: Wednesday, July 08, 1998
Incident: No
Fire: No.
Number of Injuries: 0
Component: BRAKES:HYDRAULIC:ANTI-SKID SYSTEM
Summary: WHEN BRAKES WERE APPLIED IN A PANIC STOP, THE PEDAL WENT TO THE FLOOR , CAUSING THE CAR TO SKID, RESULTING IN A EXTENDED STOPPING DISTANCE. DEALER HAS INSPECT

ODI ID: 825527
Make: ISUZU TRUCK
Model: RODEO
Year: 1998
Date of Failure:
Incident: No
Fire: No
Number of Injuries: 0
Component: HEATER:EXHAUST MANIFOLD:DEFROSTER:DEFOGGER
Summary: HEATER BOX BRACKET IS LOCATED DIRECTLY ABOVE ACCELATOR PEDAL WHICH IS CAUSING A INTERFERENCE WHEN APPLYING BRAKES. ALMOST RESULTING IN REAREND COLLISION.. ANUF

ODI ID: 822713
Make: ISUZU TRUCK
Model: RODEO
Year: 1998
Date of Failure: Saturday, November 08, 1997
Incident: No
Fire: No
Number of Injuries: 0
Component: LIGHTING:FUSE:FOG LIGHTS
Summary: GOING 55MPH WHEN THE FOG LIGHTS FLICKED ON & THEN WENT OFF. STOPPED VEHICLE TO CHECK. VEHICLE FAILED TO START AFTER SITTING AWHILE. WAS INFORMED BY MECHANIC TH

ODI ID: 823463
Make: ISUZU TRUCK
Model: RODEO
Year: 1998
Date of Failure: Sunday, April 19, 1998
Incident: No
Fire: No
Number of Injuries: 0
Component: BRAKES:HYDRAULIC SYSTEM
Summary: ANY TIME WHEN APPLYING THE BRAKES, THERE IS A LOUD SQUEALING NOISE COMING FROM THE REAR BRAKES AND A VIBRATION IN THE STEERING WHEEL. VEHICLE HAS BEEN TAKEN TO

ODI ID: 824002
Make: ISUZU TRUCK
Model: RODEO
Year: 1998
Date of Failure: Friday, June 05, 1998
Incident: No
Fire: No
Number of Injuries: 0
Component: BRAKES:HYDRAULIC:ANTI-SKID SYSTEM
Summary: WHEN DRIVING THE VEHICLE AT ANY SPEED BETWEEN 20-60MPH, ON

NORMAL ROAD CONDITIONS AND WHEN SLOWING DOWN OR HITTING A SERIES OF BUMPS. THE BRAKE PEDAL GOES TO TH

ODI ID: 820301
Make: ISUZU TRUCK
Model: RODEO
Year: 1998
Date of Failure: Tuesday, December 30, 1997
Incident: No
Fire: No
Number of Injuries: 0
Component: BRAKES:HYDRAULIC:ANTI-SKID SYSTEM
Summary: WHEN THE BRAKES ARE APPLIED, THE PEDAL GOES TO THE FLOOR, RESULTING IN EXTENDED NSTOPPING DISTANCE. THE DEALER HAS BEEN NOTIFIED. *AK

ODI ID: 822329
Make: ISUZU TRUCK
Model: RODEO
Year: 1998
Date of Failure: Tuesday, March 03, 1998
Incident: No
Fire: No
Number of Injuries: 0
Component: BRAKES:HYDRAULIC:ANTI-SKID SYSTEM
Summary: ABS BRAKE PROBLEMS; WHEN APPLYING THE BRAKES ON REGULAR ROAD SURFACES, UNDER NORMAL BRAKING, IF HITTING A BUMP OR IRREGULATIES IN THE ROAD, THE PEDAL TRAVELS TO

ODI ID: 822713
Make: ISUZU TRUCK
Model: RODEO

Year: 1998
Date of Failure: Saturday, November 08, 1997
Incident: No
Fire: No
Number of Injuries: 0
Component: ELECTRICAL SYSTEM:ALTERNATOR:GENERATOR
Summary: GOING 55MPH WHEN THE FOG LIGHTS FLICKED ON & THEN WENT OFF. STOPPED VEHICLE TO CHECK. VEHICLE FAILED TO START AFTER SITTING AWHILE. WAS INFORMED BY MECHANIC TH

ODI ID: 540908
Make: ISUZU TRUCK
Model: RODEO
Year: 1998
Date of Failure:
Incident: No
Fire: No
Number of Injuries: 0
Component: EQUIPMENT:ELECTRIC EQUIPMENT:RADIO:TAPE DECK ETC.
Summary: SIX DISC CD CHANGER INOPERATIVE.

ODI ID: 541038
Make: ISUZU TRUCK
Model: RODEO
Year: 1998
Date of Failure: Saturday, August 01, 1998

Incident: No
Fire: No
Number of Injuries: 0
Component: BRAKES:HYDRAULIC SYSTEM
Summary: BRAKES FAILED RESULTING IN VEHICLE CRASH.

ODI ID: 541824
Make: ISUZU TRUCK
Model: RODEO
Year: 1998
Date of Failure: Saturday, August 01, 1998
Incident: No
Fire: No
Number of Injuries: 0
Component: BRAKES:HYDRAULIC SYSTEM
Summary: AIR IN BRAKE SYSTEM CAUSING THEM TO FAIL.

ODI ID: 540908
Make: ISUZU TRUCK
Model: RODEO

Year: 1998
Date of Failure:
Incident: No
Fire: No
Number of Injuries: 0
Component: FUEL:FUEL SYSTEMS
Summary: FUEL LEAK.

ODI ID: 540908
Make: ISUZU TRUCK
Model: RODEO
Year: 1998
Date of Failure:
Incident: No
Fire: No
Number of Injuries: 0
Component: POWER TRAIN:AXLE ASSEMBLY
Summary: REAR AXEL LEAK.

ODI ID: 540908
Make: ISUZU TRUCK
Model: RODEO
Year: 1998
Date of Failure:
Incident: No
Fire: No
Number of Injuries: 0
Component: EQUIPMENT:ELECTRIC POWER ACCESSORIES:WINDOWS
Summary: POWER WINDOW WENT DOWN BUT WOULD NOT GO BACK UP.

Office of Defects Investigation
Complaints Database

Call the **Auto Safety Hotline** toll free at (888) 327-4236 to report safety defects or to obtain information on cars, trucks, child seats, highway or traffic safety.

Report Date: November 11, 1998 11:02:36 AM

ODI ID: 534377
Make: ISUZU TRUCK
Model: RODEO
Year: 1998
Date of Failure: Wednesday, April 29, 1998
Incident: No
Fire: No
Number of Injuries: 0
Component: POWER TRAIN:TRANSMISSION:STANDARD:MANUAL
Summary: TRANSMISSION WOULD NOT SHIFT/SLIPPING

ODI ID: 536095
Make: ISUZU TRUCK
Model: RODEO
Year: 1998
Date of Failure: Friday, March 06, 1998
Incident: No
Fire: No
Number of Injuries: 0
Component: POWER TRAIN
Summary: TRANSMISSION FAILED.

ODI ID: 540908
Make: ISUZU TRUCK
Model: RODEO
Year: 1998
Date of Failure:
Incident: No
Fire: No
Number of Injuries: 0
Component: SUSPENSION:SINGLE AXLE:REAR:SHOCK ABSORBER
Summary: RIGHT REAR SHOCKS HAD TO BE REPLACED BECAUSE OF A BIG WELDING SPUTTER.

ODI ID: 828839
Make: ISUZU TRUCK
Model: RODEO
Year: 1998
Date of Failure: Thursday, March 26, 1998
Incident: Yes
Fire: No
Number of Injuries: 0
Component: INTERIOR SYSTEMS:PASSIVE RESTRAINT:AIR BAG:DRIVER
Summary: VEHICLE WAS STOLEN FROM DRIVEWAY. VEHICLE WAS RECOVERED THE NEXT DAY, BUT WAS INVOVLED IN AN ACCIDENT IN WHICH BOTH AIR BAGS DID NOT DEPLOY. ALSO, FRONT WINDS

ODI ID: 828848
Make: ISUZU TRUCK
Model: RODEO
Year: 1998
Date of Failure: Saturday, August 15, 1998
Incident: No
Fire: No
Number of Injuries: 0
Component: POWER TRAIN:TRANSMISSION:AUTOMATIC
Summary: TRANSMISSION SLIPPING AND MAKES CLUNKING NOISE WHENEVER CONSUMER SHIFTS INTO DRIVE. VEHICLE BEEN IN/OUT OF DEALER SHOP ON THREE OCCASIONS. AND PROBLEM STILL U

ODI ID: 829429
Make: ISUZU TRUCK

Model: RODEO
Year: 1998
Date of Failure: Sunday, October 25, 1998
Incident: No
Fire: No
Number of Injuries: 0

Component: BRAKES:HYDRAULIC:ANTI-SKID SYSTEM
Summary: WHEN DEPESSING THE BRAKE PEDAL, THE VEHICLE DID NOT STOP. THIS HAPPENED WITHOUT WARNING. DRIVER WAS ABLE TO PUT TRUCK IN NEUTRAL, THEN IN PARK WHILE TURNING I

This search returned 26 records.

New Search
Return to Safety Problems and Issues

Send mail to the Web Master

From:

Date : November 19, 1998
RE: 1998 Isuzu Rodeo, purchased in October 1998 at Neil Honda
Hempstead, N.Y. (516)481-2800

TO: American Isuzu Corporation
Whittier, California

ATT: Mr. Ron Reynolds

Fax No. 562-908-9575
Phone # 562-699-0500

Dear Mr. Reynolds,

As per our phone conversation please find a copy of the police report describing the accident on November 8, 1998 while driving the above vehicle. As indicated my son was traveling in traffic when he applied the brake to stop and without warning the brake began to vibrate and failed to stop rearending another vehicle which rearended a third car. Without a doubt, this is a very serious situation.

In addition to the above, I have had the car back for a defective passenger door and a screw that had fallen from a harness.

I took the car back to the dealership, where it still remains 10 days later.

We hope to hear from you soon regarding this matter.

Thank you.

Total 5 Pages

Page 1 of 2 Pages

Precinct: 043

Accident No.: 2959

New York State Department of Motor Vehicles

POLICE ACCIDENT REPORT (NYC)

MV-104AN (1/95)

DMV USE

Accident Date (Month / Day / Year)	Day of Week	Time (Military)	No. of Vehicles	No. Injured	No. Killed	Non-Highway	Not Investigated at Scene	Left Scene	Police Photos
11 / 8 / 98	SU	1420	3	1	0	☐	☐	☐	☐ Yes ☒ No

TRIAN

DMV USE

Apt. No.

Date of Birth	Sex	Unlicensed	No. of Occup.	Public Property Damaged	State of Lic.
11/15/74	M	☐	2	☐	NY

Date of Birth	Sex	Unlicensed	No. of Occup.	Public Property Damaged	State of Lic.
4 Jan 58	M	☐	4	☐	NY

Reg. Vehicle Year & Make: 96 SUBAR | Vehicle Type: 2DSD | Ins. Code: 355

Reg. Vehicle Year & Make: 49 M+S | Vehicle Type: 4DSD | Ins. Code: 637

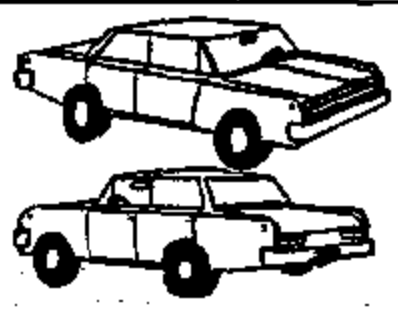
Check if involved vehicle:
☐ is a commercial motor vehicle
☐ is more than 95 inches wide;
☐ is more than 34 feet long;
☐ was operated with an overweight permit;
☐ was operated with an overdimension permit.

ACCIDENT DIAGRAM

Rear End 1. | Left Turn 3. | Right Angle 4. | Right Turn 5. | Head On 7.
Sideswipe 2. | Left Turn 0. | | Right Turn 6. | Sideswipe 8.

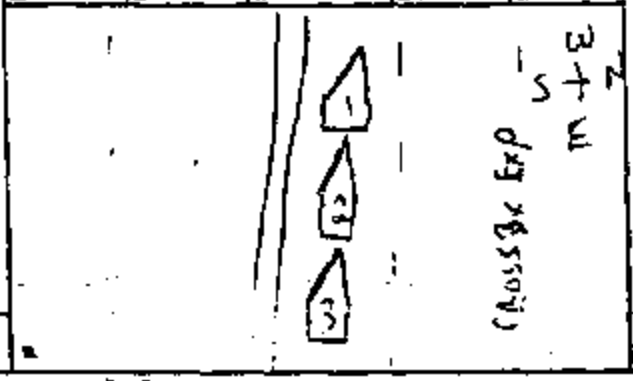
Check if involved vehicle:
☐ is a commercial motor vehicle;
☐ is more than 95 inches wide;
☐ is more than 34 feet long;
☐ was operated with an overweight permit;
☐ was operated with an overdimension permit.

VEHICLE 1 DAMAGE



☐ No Damage ☐ Undercarriage

Vehicle Towed By To



VEHICLE 2 DAMAGE

☐ No Damage ☐ Undercarriage

Vehicle Towed By To

Location Code

County: ☒ Bronx ☐ Kings ☐ New York ☐ Queens ☐ Richmond

Route No. or Street Name: 50 ☐ Miles ☐ N ☒ E ☒ Feet ☐ S ☐ W of ☐ At Intersection With

on Cross Bronx Expressway Westchester Ave

Ticket/Arrest Number(s): 2060 377756 | Complaint No.

Ticket/Arrest ☐ Opr 1 ☐ Opr 2 ☐ Pedestrian ☐ Bicyclist ☐ Other

Violation Section(s): 509.1

Accident Description/Officer's Notes: VEH #2 WAS travelling WB ON Cross Expressway AND as NE applied the brake to stop in traffic the brake pedal started to vibrate and failed to stop and rearended VEH #3 which rearended VEH #1.

	8	9	10	11	12	13	14	15	16	17	18
A	1	1	4	1	23	F	–	–	6	–	–
B	1	2	4	1	23	F	–	–	6	–	–
C	2	1	4	1	40	M	–	–	6	–	–
D	2	3	4	1	17	M	4		6	RMA	
E	2	6	4	1	14	M	–	–	6	–	–
F	2	4	4	1	18	F	–	–	6	–	–
G	3	1	4	1	25	M	–	–	6	–	–

Names - If Deceased, Give Date of Death

00000077

SIGN HERE	Officer's Rank and Name	Badge No.	Department	Precinct	Post/Sector	Reviewing Officer	Date/Time Reviewed
	[illegible] 888903	09	03030	043	K	[illegible]	11/10/98

PERSONS KILLED OR INJURED IN ACCIDENT* (Letter designation of persons killed or injured must correspond with letter designation on fr

A Last Name	First	M.I.	E Last Name	First	
Address			Address		
B Last Name	First	M.I.	F Last Name	First	
Address			Address		
C Last Name	First	M.I.	G Last Name	First	
Address			Address		
D Last Name	First	M.I.	Highway Dist. at Scene? ☐ Yes ☐ No Name:		
Address					Shield No.

*ENTER INSUR
Vehicle No. 1

WITNESSES (Attach separate sheet, if necessary)

Name	Address	Phone

DUPLICATE COPY REQUIRED FOR:

- ☐ Dept. of Motor Vehicles (Person Killed/Injured)
- ☐ Motor Transport Division (P.D. Vehicle Involved)
- ☐ NYC Taxi & Limousine Comm. (Licensed Taxi or Limousine Involved)
- ☐ Other City Agency (Specify) _____
- ☐ Office of Comptroller (City Involved)
- ☐ Personnel Safety Unit (P.D. Vehicle Involved)
- ☐ NYS Thruway Authority

NOTIFICATIONS: (Enter name, address, and relationship of friend or relative notified. If aided person is unidentified, list who at Missing Person Squa notified. In either case, give date and time of notification.)

PROPERTY DAMAGED (other than vehicles)	OWNER OR PROPERTY (include city agency, where applicable)

IF NYPD VEHICLE IS INVOLVED:

Police Vehicle-Operator's First Name	Last Name	Rank	Shield No.	Tax Reg. No.	Command

Make of Vehicle	Year	Type of Vehicle	Reg. No. (If Any)	Dept. No.	Assigned To What Comma

Equipment In Use At Time of Accident

☐ Siren ☐ Horn ☐ Turret Light ☐ 4-Way Flasher ☐ Hi-Level Warning Lights ☐ Traffic Cones ☐ Headlights

ACTIONS OF POLICE VEHICLE

- ☐ Responding to Code Signal _____
- ☐ Pursuing Violator
- ☐ Other (Describe) _____
- ☐ Complying with Station House Directive
- ☐ Routine Patrol

Page 2 of 2 Pages

Precinct: 043

Accident No.: 2959

New York State Department of Motor Vehicles

POLICE ACCIDENT REPORT (NYC)

MV-104AN (1/95)

DMV USE

Accident Date (Month / Day / Year)	Day of Week	Time (Military)	No. of Vehicles	No. Injured	No. Killed	Non-Highway	Not Investigated at Scene	Left Scene	Police Photos
11 / 2 / 98	SU	1420	3	1	0	☐	☐	☐	☐ Yes ☑ No

VEHICLE 1 ☐ VEHICLE 2 ☐ BICYCLIST ☐ PEDESTRIAN

DMV USE

Name-exactly as printed on license

Address (include Number & Street) Apt. No.

City or Town State Zip Code

Date of Birth (Month / Day / Year)	Sex	Unlicensed	No. of Occup.	Public Property Damaged	State of Lic.
2/13/38	M	☐	3	☐	NY

DMV USE

Name-exactly as printed on license

Address (include Number & Street) Apt. No.

City or Town State Zip Code

Date of Birth (Month / Day / Year)	Sex	Unlicensed	No. of Occup.	Public Property Damaged	State of Lic.
		☐		☐	

Name-exactly as printed on registration

Address (include Number & Street) Apt. No.

City or Town State Zip Code

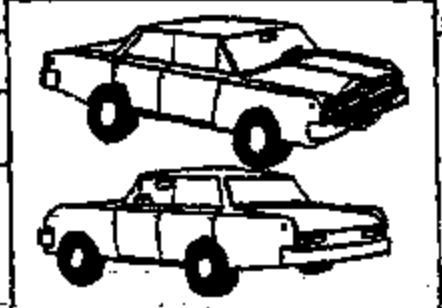
Date of Birth (Month / Day / Year)

Haz. Mat. ☐ Code Release

Vehicle Year & Make	Vehicle Type	Ins. Code	Plate Number	State of Reg.	Vehicle Year & Make	Vehicle Type	Ins. Code
98 ISUZU	SUBU	631					

Check if involved vehicle:
- ☐ is a commercial motor vehicle
- ☐ is more than 95 inches wide;
- ☐ is more than 34 feet long;
- ☐ was operated with an overweight permit;
- ☐ was operated with an overdimension permit.

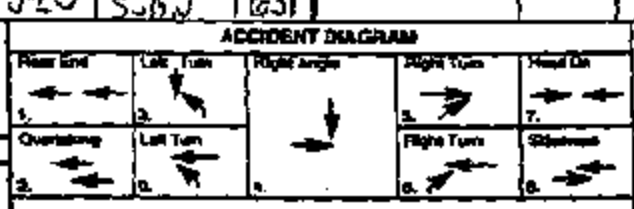
VEHICLE 1 DAMAGE



☐ No Damage ☐ Undercarriage

Vehicle Towed By To

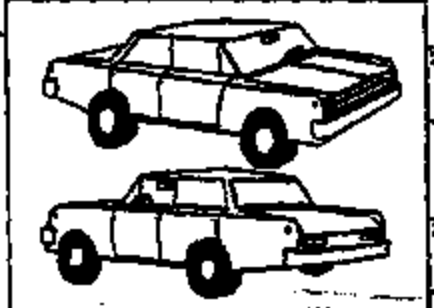
ACCIDENT DIAGRAM



See Page #1

Check if involved vehicle:
- ☐ is a commercial motor vehicle;
- ☐ is more than 95 inches wide;
- ☐ is more than 34 feet long;
- ☐ was operated with an overweight permit;
- ☐ was operated with an overdimension permit.

VEHICLE 2 DAMAGE



☐ No Damage ☐ Undercarriage

Vehicle Towed By To

Location Code

County ☐ Bronx ☐ Kings ☐ New York ☐ Queens ☐ Richmond

Route No. or Street Name

on _____ ☐ Miles ☐ N ☐ E ☐ Feet ☐ S ☐ W of ☐ At Intersection With

Ticket/Arrest Number(s) Complaint No.

Ticket/Arrest ☐ Opr 1 ☐ Opr 2 ☐ Pedestrian ☐ Bicyclist ☐ Other

Violation Section(s)

Accident Description/Officer's Notes

INVOLVED	8	9	10	11	12	13	14	15	16	17	18	Names - If Deceased, Give Date of Death
A	2	3	U	1	73	M	—	—	6	—	—	
B	3	6	U	1	26	M	—	—	6	—	—	
C												
D												
E												
F												
G												

00000079

SIGN HERE	Officer's Rank and Name	Badge No.	Department	Precinct	Post/Sector	Reviewing Officer	Date/Time Reviewed
	P 188903	99	03030	043	K		

PERSONS KILLED OR INJURED IN ACCIDENT: (Enter designation of persons involved)

A Last Name	First	M.I.	E Last Name	First	
Address			Address		
B Last Name	First	M.I.	F Last Name	First	
Address			Address		
C Last Name	First	M.I.	G Last Name	First	
Address			Address		
D Last Name	First	M.I.	Highway Dist. at Scene? ☐ Yes ☐ No Name:		
Address					Shield No.

*ENTER INSURANCE IDENTIFICATION CARD (Injured cases ONLY)
Vehicle No. 3 Vehicle No. 2

WITNESSES (Attach separate sheet, if necessary)

Name	Address	Phone

DUPLICATE COPY REQUIRED FOR:

- ☒ Dept. of Motor Vehicles (Person Killed/Injured)
- ☐ Motor Transport Division (P.D. Vehicle Involved)
- ☐ NYC Taxi & Limousine Comm. (Licensed Taxi or Limousine Involved)
- ☐ Other City Agency (Specify) _____
- ☐ Office of Comptroller (City Involved)
- ☐ Personnel Safety Unit (P.D. Vehicle Involved)
- ☐ NYS Thruway Authority

NOTIFICATIONS: (Enter name, address, and relationship of friend or relative notified. If aided person is unidentified, list who at Missing Person Sq notified. In either case, give date and time of notification.)

PROPERTY DAMAGED (other than vehicles)	OWNER OR PROPERTY (include city agency, where applicable)

IF NYPD VEHICLE IS INVOLVED:

Police Vehicle-Operator's First Name	Last Name	Rank	Shield No.	Tax Reg. No.	Command

Make of Vehicle	Year	Type of Vehicle	Reg. No. (If Any)	Dept. No.	Assigned To What Com

Equipment in Use At Time of Accident
☐ Siren ☐ Horn ☐ Turret Light ☐ 4-Way Flasher ☐ Hi-Level Warning Lights ☐ Traffic Cones ☐ Headlights

ACTIONS OF POLICE VEHICLE

- ☐ Responding to Code Signal _____
- ☐ Pursuing Violator
- ☐ Other (Describe) _____
- ☐ Complying with Station House Directive
- ☐ Routine Patrol

000000 0

MV-104AN (1/96)

From:

Date : November 19, 1998

To: DAVE MITCHELL - Teachers Insurance, Long Beach, N.Y.
FAX 889-4405

As per our telephone conversation I am faxing a copy of my son Nicholas Moreno's insurance cards. Thank you.

Allstate Automobile Insurance

A Quick Guide to This Package

- **PROOF OF INSURANCE CARD**
  State law requires that these cards be kept in your vehicles. If you accept this offer to renew, please place them in your vehicles on the effective date.

- **POLICY DECLARATIONS**
  The Policy Declarations section contains detailed information about your policy such as drivers, vehicles, coverages, limits, and premiums. Please take a moment to check this information.

- **CHANGES TO YOUR POLICY**
  This section lists any changes that have been made to your insurance coverage effective at this renewal. Please read through this section carefully.

- **IMPORTANT NOTICE**
  The Important Notice section provides you with explanations about insurance issues or any other policy information that we think may be helpful to you.

- **QUESTIONS**
  Do you have any questions about this package? Just call your Allstate agent.

Your bill will be mailed separately.

IONY

FS-20 (9/76) **NEW YORK STATE INSURANCE IDENTIFICATION CARD**

Co Code No. 012

Allstate Indemnity Company

An authorized NEW YORK insurer has issued an Owner's Policy of Liability Insurance complying with Article 6 (Motor Vehicle Financial Security Act) of the NEW YORK Vehicle and Traffic Law to:

Effective Date 09/14/98

Expiration Date 03/14/99

Name and Address of Agency or Office Issuing this Card:
Allstate Indemnity Company
Robert P Grant
(516) 747-4444
219 Mineola Blvd
Mineola NY 11501

Authorized Representative

Applicable with respect to the following Motor Vehicle:

Year	Make/Model	Vehicle Identification Number
89	Chevy Celebrity	1G1AW51R4K6213359

U6614B-1 SEE IMPORTANT MESSAGE ON REVERSE SIDE

FS-20 (9/76) **NEW YORK STATE INSURANCE IDENTIFICATION CARD**

Co Code No. 012

Allstate Indemnity Company

An authorized NEW YORK insurer has issued an Owner's Policy of Liability Insurance complying with Article 6 (Motor Vehicle Financial Security Act) of the NEW YORK Vehicle and Traffic Law to:

Effective Date 09/14/98

Expiration Date 03/14/99

Name and Address of Agency or Office Issuing this Card:
Allstate Indemnity Company
Robert P Grant
(516) 747-4444
219 Mineola Blvd
Mineola NY 11501

Authorized Representative

Applicable with respect to the following Motor Vehicle:

Year	Make/Model	Vehicle Identification Number
89	Chevy Celebrity	1G1AW51R4K6213359

U6614B-1 SEE IMPORTANT MESSAGE ON REVERSE SIDE

00000089

11/19/98

Claim #

work

Policy #

Accident occurred 11/8/98

TO: Christine Carlton
Claim Dept.
Teachers Ins.
FAX# 889-1750

Please find the police report regarding the above Claim

Total Pages
5

Thank You
Carolyn Thomas

Teachers' Insurance Plan

Special rates for a special class of people
Auto • Umbrella

November 19, 1998

RE: Claim #:
Date of Loss:
Driver:

Dear Ms.

I have been assigned to handle the above captioned loss.

Enclosed please find two Motor Vehicle Accident forms (MV-104). This report must be completed and a copy must be sent to: Accident Record Bureau, P.O. Box 2925, Empire State Plaza, Albany, NY 12220-0925 if there is any accident occurring in New York State causing death, personal injury or damage over $1,000.00 to the property of any one person.

The second copy **must** be returned to me in order to assist in determining responsibility for this loss, even if you do not file with the state. Please return a copy in the enclosed self addressed envelope for my records, so that I can protect your interests in the matter.

If you have any questions, please contact me.

Sincerely,

Christine Carlson

Christine Carlson
Claims Examiner
516-431-4441 Ext. 3203

/pc

Enclosure

00000084

370 West Park Avenue, Long Beach, N.Y. 11561-3245 • Phone: 1-800-283-2243 • Fax: (516)

Judy

543208

RECEIVED

COPIED

24 December 1998

99 DEC 29 AM 10: 04

OFFICE OF DEFECTS INVESTIGATION

98V-170

MP

National Highway Traffic Safety Administration
U.S. Department of Transportation
Washington, D.C. 20590

RE: Safety Defect
1998 Isuzu Rodeo VIN# 4S2CM58W1W4322062

To Whom It May Concern:

We are contacting your department in accordance with the instructions noted in our owner's manual. The attached documentation clearly explains the potential safety defect with our 1998 Isuzu Rodeo.

My family would like to know if there have been complaints to your department associated with the 1998 Rodeo involving the intermittent loss of brakes. Have there been any reported accidents with this particular vehicle model that involved the ABS? The recent urgent recall involving the ABS coil module issued by American Isuzu Motors has heightened our concern for the safe operation of this vehicle.

Your response to our inquiries and assistance on this matter will greatly appreciated.

Sincerely,

Enclosures

Cc: The Premier Insurance Company
ISU Soderberg Insurance Agency

00000085

S.S.

24 December 1998

American Isuzu Motors Inc.
Northeastern Regional Office
3 Stewart Court
PO Box 3015
Denville, NJ 07834

RE: Safety Defect
1998 Isuzu Rodeo VIN# 4S2CM58W1W4322062

To Whom It May Concern:

We are contacting American Isuzu Motors in accordance with the instructions contained in our owner's manual. My family is very concerned about the potential brake problem with our Rodeo. One accident has already occurred and we believe that the loss of the braking power on the vehicle may have contributed to the July 1998 incident.

The enclosed letters to The Premier Insurance Company and The Commonwealth of Massachusetts clearly explain the history of the problem. 128 Isuzu has serviced the vehicle since the ABS recall but their response to our inquiries about a defect involving the brakes on the Rodeo has been unsatisfactory. While we have been pleased with the dealership since the leasing of the Rodeo in April 1998, the potential problem with the brakes on the vehicle is a serious matter and requires the attention of the manufacturer.

Following your review of the attached documentation, please contact me to discuss a method for either replacing the braking system on this vehicle or correcting the problem. We believe the current condition of the Rodeo jeopardizes the safety of the driver and passengers. Your cooperation on this matter will be greatly appreciated.

Sincerely,

Enclosures

Cc: The Premier Insurance Company
National Highway Traffic Safety Administration
ISU Soderberg Insurance Agency
128 Isuzu

24 December 1998

Ms. Paula Miller
The Premier Insurance Company
PO Box 5013
Danvers, MA 01923
RE: Claim # S8J1504

Dear Paula:

Recently I related the concern about the safety of our new 1998 Isuzu Rodeo to our insurance agent and it was suggested that we contact you directly regarding the July 1998 auto accident.

Last July 1998 my son Aaron was involved in a motor vehicle accident. At the time of the incident he claimed that his brakes did not operate and this problem caused the accident. The vehicle was brand new, the weather was fine and it was during the day and Aaron was not under the influence of any substance. As a father of a young driver, I brushed aside his pleas that he did not cause the mishap and I did not contest the deductible or appeal the insurance surcharge. I believe that I may have acted too hastily for the following reasons:

1. After the accident my son continued to complain about the performance of his brakes and the intermittent loss of braking power. In fact during the repair of the Isuzu Rodeo, I asked the auto body shop to inspect the brake system. They reported that the system was fine but the complaints by son continued. On some occasions the brake light stayed on and we reported this to the dealership as well.

2. In November 1998 we received the attached recall notice concerning the ABS from American Isuzu Motors and made arrangements to have the vehicle serviced at 128 Isuzu where we purchased the vehicle. A letter to the dealership articulating our concerns about the safety of the brakes is enclosed for your review. The service report is also attached.

3. Since the time of the service on 12.09.98, my son once again experienced a loss of brakes and was nearly involved in another accident with the Rodeo the week after the vehicle was serviced. We have a witness to this incident.

I am very concerned that we are probably dealing with a vehicle that has a serious safety defect with the braking system. Based on the enclosed documentation, we have submitted an appeal to the Insurance Division regarding the surcharge. Based on this new evidence we should not be subjected to a surcharge since we are not more than 50% at fault for the accident.

In addition I am notifying American Isuzu Motors and the National Highway Traffic Safety Administration of this potential safety defect. We feel the ongoing problem with this vehicle jeopardizes the safety of the individuals driving this Isuzu Rodeo and the problem must be corrected or the system replaced.

Following your review of our letter and the enclosed documentation please contact me to discuss this matter in more detail. I can be reached during the day at I look forward to your assistance in addressing this problem with American Isuzu Motors.

Sincerely,

Enclosures

Cc: American Isuzu Motors
National Highway Traffic Safety Administration
ISU Soderberg Insurance Agency

24 December 1998

Ms. Sharilynn McIntosh
Merit Rating Surcharge Appeal Coordinator
The Commonwealth of Massachusetts
Division of Insurance
470 Atlantic Avenue, 6th Floor
Boston, MA 02210-2223

RE: Request for Extension of Filing Time Limit
Lic#029-68-0856

Dear Ms. McIntosh:

Please accept our request for an extension of the surcharge appeal. We are able to show good cause for failure to file in a timely manner for the following reasons:

1. The deadline for filing the surcharge appeal occurred on 11.20.98. We originally were not going to appeal the surcharge, but new evidence since the deadline has surfaced which indicates that our vehicle may have a serious safety defect affecting the performance of the braking system.

2. On 11.07.98 we received an **urgent recall notice** from American Isuzu Motors regarding the ABS. A copy of the notice is attached and it indicates this recall campaign was absolutely necessary.

3. Following the July 1998 accident, my son reported that he had experienced a loss of braking power and he was unable to stop the vehicle. Since the accident, Aaron has complained about the brakes on his Isuzu repeatedly. On 12.08.98 I wrote a letter to the dealership expressing my concerns about the braking system on the vehicle. This was the second time we had expressed concern to the dealership about the safety of the new Rodeo. We had the vehicle serviced on 12.09.98 and the recall was completed including related work associated with the brakes on the vehicle. A copy of the letter and service report is attached.

4. Since the time of the service on 12.09.98, my son once again experienced a loss of brakes and was nearly involved in another accident the following week. We have a witness to this incident.

I believe that the accident on 7.07.98 was the result of the defect in the braking system on our 1998 Isuzu and therefore my son was not more than 50% at fault in this accident and

wish to appeal to the Massachusetts Division of Insurance. The original surcharge appeal form and printout dated 12.16.98 are enclosed along with a check in t he amount of $25.00.

Your assistance in processing our appeal of the surcharge is greatly appreciated.

Sincerely,

Enclosures

CC: National Highway Traffic Safety Administration
American Isuzu Motors
The Premier Insurance Company
ISU Soderberg Insurance Agency

. Tech-1 computer test or Air bubbles

ISUZU

American Isuzu Motors Inc.

Q- Hard brake pedal (Gene Alderman)

VEHICLE RECALL REMINDER

FOR YOUR CONTINUED DRIVING SAFETY, AMERICAN ISUZU MOTORS INC. Is recalling your vehicle for immediate repair. Please take your vehicle to your Isuzu dealer - TO BE REPAIRED AT NO CHARGE. This recall campaign is ABSOLUTELY NECESSARY. Do not delay. Please call your Isuzu dealer to schedule your vehicle.

VIN #: 4S2CM58W1W4322062

DEALER: D19005
128 ISUZU
614 NORTH AVE.
WAKEFIELD MA 01880

PHONE: (781) 245-8000 ABS Coil Module 9B09L2

Campaign Name and Number: Engine Ground Wire 98V-170

00000091

8 December 1998

Mr. George Alderman
128 Isuzu
614 North Avenue
Wakefield, MA 01880

RE: 1998 Isuzu Rodeo
Vehicle #4S2CM58WIW4322062

Dear George:

Pursuant to our telephone conversation on 1 December 1998, my son has expressed concern about the Rodeo's ABS performance since shortly after the purchase of the vehicle from 128 Isuzu in April 1998.
He indicates that the brakes have the following problems:

1. Warning light comes on randomly.
2. When ABS is engaged the brakes have little or no effect on the slowing down the vehicle. My son has described it, as not impacting the momentum of the Rodeo as it is moving.
3. When the vehicle is turned off, he has complained about a burning order.

Please note that when the engine is revved up in the morning, we have always detected a strange noise similar to a "crackling" sound. We would like to have a technician inspect this problem as well.

The safety of the brake system concerns us very much. My wife and I are concerned for the well being of our son. We hope that your technical staff will have success uncovering the problem. If you have any question while the vehicle is in service, please contact me during the day at

Thank you for your assistance.

Sincerely,

Cc: Soderberg Insurance Agency

128

Oldsmobile

mazda

ISUZU

618 NORTH AVENUE
WAKEFIELD, MASSACHUSETTS 01880
MAZDA SERVICE (781) 245-4719 OLDS SERVICE (781) 246-2006

GM QUALITY SERVICE/PARTS GM

Oldsmobile

ISUZU

We surround your car with Mazda quality parts, service and workmanship. We surround you with satisfaction.

— INVOICE TO — — OWNER INFORMATION — INVOICE: W34506

— FOR OFFICE USE — — VEHICLE INFORMATION —

T/NO: 0682 ADV: 250 ALDERMAN INVOICED AT: 12/09/98 16:05:49 SU 98 RODEO WHITE LICENSE NUMBER:

CAUSE	RECALL					090744	314	.3	19.50
CORRECTION	RECALL COMPLETE								
	PART NUMBER	POS	NOTE	DESCRIPTION	QTY	SELL		
	ISU 8971925490			NO MATCH	1	102.80		102.80
	PARTS: COUNT 1								
FACTORY	FAIL CODE : 07								

LINE AUTH: GA 120998 16:04 PART AUTH: GA 120998 16:04

— SUBTOTAL —

PARTS	143.92
LAB-MECHANICAL	19.50
TOTAL CHARGE FOR CONCERN	163.42

TYPE: W

— GRAND TOTALS —

SUMMARY OF CHARGES FOR INVOICE W34506

PARTS	143.92
LAB-MECHANICAL	78.00
TOTAL CHARGE	221.92

PAYMENT DISTRIBUTION FOR INVOICE W34506

TOTAL CHARGE	221.92
FAC WARRANTY	221.92

LAB RATE: 65.00- 65.00
ATTENTION: THE FOLLOWING INVOICES ALSO EXIST
CUS - CUSTOMERPAY
IF YOU HAVE ANY QUESTIONS - PLEASE SEE GEORGE J. ALDERMAN

**********IMPORTANT NOTICE**********
*YOU MAY BE SURVEYED FROM ISUZU AS A RESULT OF THE SERVICE PERFORMED *
*ON YOUR VEHICLE TODAY. THIS IS OUR REPORT CARD TO THE MANUFACTURER. *
*IF YOU CANNOT RATE US COMPLETELY SATISFIED, WE URGE YOU TO CONTACT *
*BOB KNOX, SERVICE MANAGER, OR YOUR SERVICE ADVISOR, SO THAT WE MAY *
*ADDRESS ANY CONCERNS YOU MAY HAVE. *

PAGE 2
LAST PAGE

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ON-LINE SERVICE INVOICING BY
TO REORDER FORMS OR SUPPLIES CALL 1-800-688-6946 EXT. 8050

THANK YOU FOR CHOOSING 128 FOR YOUR AUTOMOTIVE NEEDS

128

Oldsmobile

mazda

ISUZU

618 NORTH AVENUE
WAKEFIELD, MASSACHUSETTS 01880
MAZDA SERVICE (781) 245-4719 OLDS SERVICE (781) 246-2006

GM QUALITY SERVICE/PARTS GM

Oldsmobile

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W34506

FOR OFFICE USE

TAG: 0682 ADV: 260 ALDERMAN, INVOICE: PRELIM WAR C W SD
MFG: 200001 TAX RULES: YYNNN INVOICED AT: 12/09/98 16:05:49
ODOMETER IN: 24850 DIST: 4S2
DATES BEGIN: 12/09/98 DONE: 12/09/98

VEHICLE INFORMATION

VIN 4S2CM58W1W4322062 LICENSE NUMBER:
98 ISUZU RODEO 4WD 4DR SPTUTY WHITE
STOCK# 000Y0184
DATES SOLD: 042098

CONCERN 51 CUSTOMER STATES ABS LIGHT COMES ON INTERMITTENTLY/BRAKES TAKE LONGER DISTANCE TO STOP LACKS BRAKING POWER
CAUSE SPONGEY
CORRECTION USE TECH 2 BLEED BRAKES ALL 4 SPONGEY
FACTORY FAIL CODE : 36

OPERATION	TECH	HOURS	AMOUNT
090217	314	.4	26.00

SUBTOTAL
LAB-MECHANICAL 26.00
TOTAL CHARGE FOR CONCERN 26.00

TYPE: W

CONCERN 52 CUSTOMER STATES BURNING SMELL WHEN ENGINE IS SHUT OFF AFTER DRIVING
CAUSE LEAK
CORRECTION FOUND LOOSE CLAMP POWER STRG RESEVOIR TIGHTEN CLAMP FLUID LEAKING
COMMENT ON MANIFOLD
FACTORY FAIL CODE : 35

OPERATION	TECH	HOURS	AMOUNT
100335	314	.2	13.00

SUBTOTAL
LAB-MECHANICAL 13.00
TOTAL CHARGE FOR CONCERN 13.00

TYPE: W

CONCERN 53 CUSTOMER STATES CLEAN INTERIOR
CAUSE RECALL
CORRECTION RECALL COMPLETE
FACTORY FAIL CODE : 07

OPERATION	TECH	HOURS	AMOUNT
090744	314	.3	19.50

SUBTOTAL
LAB-MECHANICAL 19.50
TOTAL CHARGE FOR CONCERN 19.50

TYPE: W

CONCERN 54* CUSTOMER STATES RECALL 9809L2 ABS RECALL

OPERATION	TECH	HOURS	AMOUNT

PAGE 1

THANK YOU FOR CHOOSING 128 FOR YOUR AUTOMOTIVE NEEDS

00000094

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mazda
ISUZU

618 NORTH AVENUE
WAKEFIELD, MASSACHUSETTS 01880
MAZDA SERVICE (781) 245-4719 OLDS SERVICE (781) 246-2006

GM QUALITY SERVICE/PARTS GM

We surround your car with Mazda quality parts, service and workmanship. We surround you with satisfaction.

E: C34506

FOR OFFICE USE

TAG: 0682 ADV: 260 ALDERMAN, INVOICE: PRELIM CUS C W SD
W-G: 200001 TAX RULES: YYNNN INVOICED AT: 12/09/98 16:00:41
ODOMETER IN: 24850 DIST: 452
DATES BEGIN: 12/09/98 DONE: 12/09/98

VEHICLE INFORMATION

VIN 4S2CM58W4W4322062 LICENSE NUMBER:
98 ISUZU RODEO 4WD 4DR SPTUTY WHITE
STOCK# 000Y0134
DATES SOLD: 042098

CONCERN 01 LUBE-OIL-FILTER
REPLACE WIPERS

OPERATION	TECH	HOURS	AMOUNT
01	314	.5 +	12.95

CORRECTION LUBE-OIL-FILTER CHECK ALL FLUIDS
COMMENT REPLACE WIPERS

PART NUMBER	POS	NOTE	DESCRIPTION	QTY	SELL	
ISU 8-97140-666-0			ELEMENT: OIL FI	18	6.00	6.00
ISU MOBILOIL		GOG	**********	19	6.00	6.00
ISU 8-97125-960-0			BLADE: WIPER	2	13.68	27.36

SUBTOTAL

PARTS	33.36
GAS-OIL-GREASE	6.00
LAB-MECHANICAL	12.95
TOTAL CHARGE FOR CONCERN	52.31

TYPE: C LINE FLAGS: HAZ

GRAND TOTALS

SUMMARY OF CHARGES FOR INVOICE C34506

PARTS	33.36
GAS-OIL-GREASE	6.00
HAZARDOUS WASTE CHG	1.18
LAB-MECHANICAL	12.95
SUB-TOTAL	53.49
SALES TAX	1.97
TOTAL CHARGE	55.46

PAYMENT DISTRIBUTION FOR INVOICE C34506

TOTAL CHARGE	55.46
CASH DUE	55.46

VARIABLE LAB RATE: 65.00-/0.00
ATTENTION: THE FOLLOWING INVOICES ALSO EXIST
WAR - WARRANTY

PAGE 1

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THANK YOU FOR CHOOSING 128 FOR YOUR AUTOMOTIVE NEEDS

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WAKEFIELD, MASSACHUSETTS 01880
MAZDA SERVICE (781) 245-4719 OLDS SERVICE (781) 246-2006

GM QUALITY SERVICE/PARTS GM

Oldsmobile

ISUZU

We surround your car with Mazda quality parts, service and workmanship. We surround you with satisfaction.

— INVOICE TO — ER INFORMATION — INVOICE: C34506

FOR OFFICE USE — VEHICLE INFORMATION

TAG: 0682 ADV: 260 ALDERMAN INVOICED AT: 12/09/98 16:00:41 SD 98 RODEO WHITE LICENSE NUMBER:

IF YOU HAVE ANY QUESTIONS - PLEASE SEE GEORGE J. ALDERMAN
SEE YOUR SERVICE ADVISOR ABOUT YOUR NEXT
*** SCHEDULED MAINTENANCE SERVICE ***

PAGE 2
LAST PAGE

THIS FORM PRINTED ON PREMIUM CARBONLESS RECYCLABLE PAPER

ON LINE SERVICE INVOICING BY UCS

TO REORDER FORMS OR SUPPLIES CALL 1-800-[illegible] EXT. 6050

THANK YOU FOR CHOOSING 128 FOR YOUR AUTOMOTIVE NEEDS

0000096

PARTS AND LABOR
WARRANTED
1 YEAR OR
12,000 MILES

I and agree that you are not responsible for loss or damage to vehicle or articles left in vehicle in case of fire, theft or any other cause beyond your control or for any delays caused by unavailability of parts or delays in parts shipments by the supplier or transporter. I hereby grant you and/or your employees permission to operate the vehicle herein described on streets, highways or elsewhere for the purpose of testing and/or inspection. An express mechanic's lien is hereby acknowledged on below vehicle to secure the amount of repairs thereto.

X _____
CUSTOMER SIGNATURE

I understand that I have the right to know before authorizing any repairs what the repairs to my car will be and what their cost will be. You need not obtain approval from me for repairs or inform me prior to performing repairs when the repairs are or their cost is the total amount for repairs does not exceed

$ _____

X _____
CUSTOMER SIGNATURE

ORIGINAL ESTIMATE $ _____ INITIALS

REVISED ESTIMATE $ _____ INITIALS

SERVICE TECHNICIAN ON DUTY
7:30 A.M. - 5:00 P.M. MONDAY THRU FRIDAY
7:30 A.M. - 4:00 P.M. SATURDAY

QUICK LUBE SERVICE
7:30 A.M. - 5:45 P.M. MONDAY THRU THURSDAY
7:30 A.M. - 5:30 P.M. FRIDAY
7:30 A.M. - 4:00 P.M. SATURDAY

NO APPOINTMENT NECESSARY

VARIABLE LAB RATE: 65.00-70.00

L.O.F.	WHEEL ALIGNMENT	ROTATE & BALANCE	STATE INSPECTION	COOLING SYS. INSP.	COOLING SYS. SERVICES	AIR COND. INSPECTION	INJECTION FLUSH	BRAKE INSPECTION	AUTO TRANS. SERVICE	GOLD CARD LOF	7,500 MILE SERVICE	15,000 MILE SERVICE	30,000 MILE SERVICE	ENG PERFORMANCE MAINT
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15

INSTRUCTIONS ON WORK TO BE DONE

01* PAY TYPE: C FLG: HAZ
LUBE-OIL-FILTER
REPLACE
WIPERS

51 PAY TYPE: W
CUSTOMER STATES ABS LIGHT COMES ON
INTERMITTENTLYBRAKES TAKE LONGER
DISTANCE TO STOP LACKS BRAKING POWER

52 PAY TYPE: W
CUSTOMER STATES BURNING SMELL WHEN
ENGINE IS SHUT OFF AFTER DRIVING

53 PAY TYPE: W
CUSTOMER STATES CLEAN INTERIOR

RO 34506 *TAG 0682* LIC: MA 3913HG SVC ADV: 260 GEORGE J. ALDERMAN
98 **VIN: 4S2CM58W1 W4322062**
ISUZU RODEO COL CD: WHITE
4WD 4DR SPTUTY
LICENSE: WHITE TRUCK
MFG CODE: 20C001 SVC DLR: 19005 SLM: 647
STOCK NUMBER: 000Y0184
SOLD:042098
ODOMETER: LAST: 16192 CURRENT: 24850
AVG PER DAY: 110 PER MONTH: 3300

HOME:
WORK:

DIST CODE: 4S2

00000097

EXTENDED SVC PLAN: TYPE: (VSI) NUMBER:(VSI)
IN FORCE: N

12/09/98 06:46:31

****PROMISED DATE: 12/09/98 TIME: 1700 ****

TAG 0682 **RO 34506** SVC ADV: 260 ... VIN: 4S2CM58W1 W4322062

Vehicle Owner's Questionnaire 702136 AD submitted 1/11/99 10:09:10 PM

Owner Information

[redacted]

Have NHTSA send signature card for authorization? Yes

Vehicle Information

vin 4s6cm58w3w4422565
make honda model passport year 1998
odometer 7200
purchase date 08/98 new or used? New body style suv
dealer Rosenthal Honda
1580 Springhill Rd
Vienna, VA 22182
703 7-49 -6600

engine size 3.2 cylinders 6 fuel injection Y turbo N fuel type Gas
antilock br. Y cruise control Y drive train 4 Wheel

driver's airbags		passenger's airbags		seat belts	
front	Y	front	Y	3-point	Y
side	N	side	N	2-point	N
				motorized	N

Incident(s)

Incident Number 1

failed component / part details

major assembly BRAKES: HYDRAULIC: ANTI-LOCK BRAKE SYSTEM (ABS)
description

location			number of	date of	mileage at	speed at	manufacturer	NHTSA
left/right	front/rear	original	failures	failure	failure	failure	contacted	contacted
NA	NA	Original	2	1/9/99	7200	25	N	N

incident details

accident	fire	airbags deployed driver's front	driver's side	passenger's front	passenger's side	number of persons injured	number of fatalities	estimated property damage	police report filed
N	N	N	N	N	N	0	0	$0	N

Tire Information

DOT number manufacturer
name size

00000098

Comments

Twice upon braking, a brake failure occured in which the brakes engaged and then suddenly the brakes seemed to release. This caused an additional 20 to 30 feet of additional vehicle travel on wet pavement. Luckily there was no vehicle immediately in front of me otherwise a collision would have occured. It seems as though the abs system releases for too long. Other abs systems I have driven in similar conditions on the same road did not present this problem. There was a constant rate of decelleration. This '98 rodeo had marked perceivable periods of decelleration and then acceleration (about 1 second) and then decelleration until a complete stop. This brake failure is extremely frightening. The road conditions were only wet.

Form Approved: O.M.B. No. 2127-0008

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

Auto Safety Hotline

Vehicle Owner's Questionnaire

NATIONWIDE 1-800-424-9393
DC METRO AREA (202) 366-0123
INTERNET: http://www.nhtsa.dot.gov

FOR AGENCY USE ONLY 197

Date Received: 12 Jan 1999

Od_cr ___ ___
rt_dt ___ ___
od_rt ___ ___
up_ltr ___ ___

Reference No. 833444

OWNER INFORMATION (Type or Print)

[redacted]

Work Number [redacted]

Home Number [redacted]

Do you authorize NHTSA to provide a copy of this report to the manufacturer of your vehicle? ☐ YES ☐ NO
In the absence of an authorization, NHTSA WILL NOT provide your name and address to the vehicle manufacturer.

Signature of Owner _____ Date ___/___/___

VEHICLE INFORMATION

Vehicle Ident. No. (VIN.) (Located at bottom of windshield on driver's side)	Vehicle Make	Vehicle Model	Vehicle Year	Current Odometer Reading
4S2CM58W1W4336950	ISUZU TRUCK	RODEO	1998	

Purchase Date: ☐ New ☒ Used

Dealer's Name _____ City _____ State _____ Zip Code _____

Engine Size (CID/CC/L ____ No Cylinders ____ ☐ Turbo ☐ Diesel ☐ Gas ☐ Fuel Injection

Transmission Type: ☐ Manual ☐ Automatic

Antilock Brakes: ☒ Yes ☐ No

Restraint System: ☐ Driverside Airbag ☐ Motorbelt ☐ Passengerside Airbag ☒ 2-Point Belt ☐ 3-Point Belt

Cruise Control: ☐ Yes ☒ No

DriveTrain: ☐ Front ☐ Rear ☐ 4-Whee

Vehicle Type: ☐ Car ☐ Sports Util. ☐ Van ☐ Truck ☐ Minivan ☐ Motorcycle ☐ Other _____

Body Style: ☐ 2-Door ☐ 4-Door ☐ Stationwagon ☐ Pick Up Truck ☒ Other

FAILED COMPONENT(S)/PART(S) INFORMATION

Component	Part Name(s)	Location	Failed Part(s)
03250000	BRAKES:HYDRAULIC:ANTI-SKID SYSTEM	☐ Left ☐ Right ☐ Front ☐ Rear	☐ Original ☐ Replacement

No of Failures: 4

Date(s) of Failure(s) 12-JAN-99
Mileage at Failure(s) 1100
Vehicle Speed at failure(s) _____

Failed Part(s) Available? ☐ Yes ☐ No

NHTSA Previously Contacted? ☐ Yes ☐ No

APPLICABLE INCIDENT INFORMATION

(Please describe in detail the incident(s), Failure(s), Crash(es), and injury(ies) on the back of this form)

Crash	Fire	Number of Persons Injured	Number of Fatalities	Estimated Property Damage	Reported to Police
☐ Yes ☒ No	☐ Yes ☒ No	0	0	0	☐ Yes ☒ No

NARRATIVE DESCRIPTION OF FAILURE(S),INCIDENT(S),INJURY(IES)

WHILE DRIVING TRIED TO STOP, BUT VEHICLE DIDN'T STOP UNTIL A FEW FEET AWAY FROM WHERE CONSUME R HAD APPLIED THE BRAKES. *AK

CONTINUE ON BACK IF NEEDED

The Privacy Act of 1974-Public Law 93-579 *This information is requested pursuant to authority vested in the National Highway Traffic Safety Act and subsequent amendments. You are under no obligation to respond to this questionnaire. Your response may be used to assist the NHTSA in determining whether a manufacturer should take appropriate action to correct a safety defect. If the NHTSA proceeds with administrative enforcement or litigation against a manufacturer, your response, or a statistical summary thereof, may be used in support of the agency's action.*

HS-Form 350 (Rev. 3/97)

00000100

Vehicle Owner's Questionnaire 702214 submitted 1/14/99 12:19:34 PM

Owner Information

[redacted]

Have NHTSA send signature card for authorization? Yes

Vehicle Information

vin 4S6CM58W4W4400459
make Honda model Passport year 1998
odometer
purchase date 08/98 new or used? New body style 4-Door
dealer King Auto Center
4330 Kukui Grove St
Lihue, HI 96754
808 2-45 -4788

engine size cylinders fuel injection N turbo N fuel type Gas
antilock br. Y cruise control Y drive train 4 Wheel

driver's airbags		passenger's airbags		seat belts	
front	Y	front	Y	3-point	N
side	N	side	N	2-point	N
				motorized	N

Incident(s)

Incident Number 1

failed component / part details

major assembly BRAKES: HYDRAULIC: ANTI-LOCK BRAKE SYSTEM (ABS)
description

location			number of	date of	mileage at	speed at	manufacturer	NHTSA
left/right	front/rear	original	failures	failure	failure	failure	contacted	contacted
NA	NA	Original	2	9/2/98	567	35	Y	N

incident details

accident	fire	airbags deployed driver's front	driver's side	passenger's front	passenger's side	number of persons injured	number of fatalities	estimated property damage	police report filed
Y	N	N	N	N	N	4		$4,600	Y

Tire Information

DOT number manufacturer
name size

00000101

Comments

Hit brakes, pedal went down to floor, didn't stop car, hit truck in front of me. Airbags didn't deploy.loy.

Vehicle Owner's Questionnaire 702450 submitted 1/21/99 8:51:48 PM

Owner Information

[redacted]

Have NHTSA send signature card for authorization? Yes

Vehicle Information

vin 4S2CK58W8W4334988
make Isuzu **model** Rodeo **year** 1998
odometer 11000
purchase date 03/98 **new or used?** New **body style** sport utility
dealer AutoWest Isuzu
43275 Automall Circle
Fremont, CA 94538
510 2-52 -5000

engine size **cylinders** 6 **fuel injection** N **turbo** N **fuel type** Gas
antilock br. Y **cruise control** Y **drive train** Front

driver's airbags		passenger's airbags		seat belts	
front	N	front	N	3-point	N
side	N	side	N	2-point	N
				motorized	N

Incident(s)

Incident Number 1

failed component / part details

major assembly description BRAKES; HYDRAULIC SYSTEM

location left/right	location front/rear	original	number of failures	date of failure	mileage at failure	speed at failure	manufacturer contacted	NHTSA contacted
NA	NA	Original	2	1/19/99	1130	20	N	N

incident details

accident	fire	airbags deployed driver's front	driver's side	passenger's front	passenger's side	number of persons injured	number of fatalities	estimated property damage	police report filed
Y	N	N	N	N	N	1			N

Tire Information

DOT number **manufacturer** isuzu
name **size**

00000103

Vehicle Owner's Questionnaire 702450 submitted 1/21/99 8:51:48 PM

Comments

At low speed 10-25mph, brake came with strong vibration but it cannot stop the vehicle

Vehicle Owner's Questionnaire 702723 submitted 1/29/99 8:40:56 PM

Owner Information

[redacted]

Have NHTSA send signature card for authorization? Yes

Vehicle Information

vin 4S2CK58W8W4334988
make Isuzu model Rodeo year 1998
odometer 11500
purchase date 03/98 new or used? New body style Sport Utility V
dealer AutoWest Isuzu
43275 Automall Circle,
fremont, CA 94538
510 2-52 -5000

engine size cylinders fuel injection N turbo N fuel type Gas
antilock br. Y cruise control Y drive train Front

driver's airbags		passenger's airbags		seat belts	
front	Y	front	Y	3-point	N
side	N	side	N	2-point	N
				motorized	N

Incident(s)

Incident Number 1

failed component / part details

major assembly BRAKES: HYDRAULIC: ANTI-LOCK BRAKE SYSTEM (ABS)
description

location left/right	location front/rear	original	number of failures	date of failure	mileage at failure	speed at failure	manufacturer contacted	NHTSA contacted
NA	NA	Original	2	1/19/99	11400	20	Y	N

incident details

accident	fire	airbags deployed driver's front	driver's side	passenger's front	passenger's side	number of persons injured	number of fatalities	estimated property damage	police report filed
Y	N	N	N	N	N	2	0	$2,000	N

Tire Information

DOT number manufacturer
name size

00000105

Comments

Brake mal-functional at low speed, strong vibration from brake, but it cannot completely stop. Run into another car created car damaged and body injury

Form Approved: O.M.B. No. 2127-0008

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

Auto Safety Hotline

Vehicle Owner's Questionnaire

NATIONWIDE 1-800-424-9393
DC METRO AREA (202) 366-0123
INTERNET: http://www.nhtsa.dot.gov

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Date Received: 9 Feb 1999

Od_or ___ ___
rt_dl ___ ___
od_rt ___ ___
up_ltr ___ ___

Reference No. 834684

OWNER INFORMATION (Type or Print)

[redacted]

Work Number [redacted]

Home Number [redacted]

Do you authorize NHTSA to provide a copy of this report to the manufacturer of your vehicle? ☐ YES ☐ NO
In the absence of an authorization, NHTSA WILL NOT provide your name and address to the vehicle manufacturer.

Signature of Owner _____ Date __/__/__

VEHICLE INFORMATION

Vehicle Ident. No. (VIN.) (Located at bottom of windshield on driver's side)	Vehicle Make	Vehicle Model	Vehicle Year	Current Odometer Reading
4F2CK58W8W4C34988	ISUZU TRUCK	RODEO	1998	

Purchase Date

☒ New ☐ Used

Dealer's Name _____
City _____ State _____ Zip Code _____

Engine Size ICID/CC/L ___
No Cylinders ___
☐ Turbo ☐ Diesel ☐ Gas ☐ Fuel Injection

Transmission Type: ☐ Manual ☐ Automatic

Antilock Brakes: ☒ Yes ☐ No

Restraint System: ☐ Driverside Airbag ☐ Motorbelt ☐ Passengerside Airbag ☐ 2-Point Belt ☐ 3-Point Belt

Cruise Control: ☐ Yes ☒ No

DriveTrain: ☐ Front ☐ Rear ☐ 4-Whee

Vehicle Type: ☐ Car ☐ Sports Ut. ☐ Van ☐ Truck ☐ Minivan ☐ Motorcycle ☐ Other _____

Body Style: ☐ 2-Door ☐ 4-Door ☐ Stationwagon ☐ Pick Up Truck ☒ Other _____

FAILED COMPONENT(S)/PART(S) INFORMATION

Component	Part Name(s)	Location	Failed Part(s)
03250000	BRAKES:HYDRAULIC:ANTI-SKID SYSTEM	☐ Left ☐ Right ☐ Front ☐ Rear	☐ Original ☐ Replacement

No of Failures

Date(s) of Failure(s) 01-JUL-98
Mileage at Failure(s) 60
Vehicle Speed at failure(s) _____

Failed Part(s) Available? ☐ Yes ☐ No

NHTSA Previously Contacted? ☐ Yes ☐ No

APPLICABLE INCIDENT INFORMATION

(Please describe in detail the incident(s), Failure(s), Crash(es), and injury(ies) on the back of this form)

Crash	Fire	Number of Persons Injured	Number of Fatalities	Estimated Property Damage	Reported to Police
☐ Yes ☒ No	☐ Yes ☒ No				☐ Yes ☒ No

NARRATIVE DESCRIPTION OF FAILURE(S),INCIDENT(S),INJURY(IES)

PE98051; INTERMITTENTLY WHILE DRIVING BRAKING SYSTEM MALFUNCTIONED AND VIBRATED, ALMOST CAUSING AN ACCIDENT. BEEN TO DEALER SEVERAL TIMES, DEALER CANNOT DETERMINE THE PROBLEM. PLEASE PROVIDE FURTHER INFORMATION. *AK

CONTINUE ON BACK IF NEEDED

The Privacy Act of 1974-Public Law 93-579 *This information is requested pursuant to authority vested in the National Highway Traffic Safety Act and subsequent amendments. You are under no obligation to respond to this questionnaire. Your response may be used to assist the NHTSA in determining whether a manufacturer should take appropriate action to correct a safety defect. If the NHTSA proceeds with administrative enforcement or litigation against a manufacturer, your response, or a statistical summary thereof, may be used in support of the agency's action.*

HS Form 350 Rev. 3/97

00000107

Vehicle Owner's Questionnaire 702631 submitted 1/27/99 12:22:59 AM

Owner Information

[redacted]

Have NHTSA send signature card for authorization? Yes

Vehicle Information

vin 4s2cm58wxw4321508
make Isuzu model Rodeo year 1998
odometer 15094
purchase date 02/98 new or used? New body style 4-Door
dealer Crystal Ford Isuzu
3111 Automobile Boulevard
Silver Spring, MD 20904
301 8-90 -6100

engine size 3.2L cylinders 6 fuel injection Y turbo N fuel type Gas
antilock br. N cruise control Y drive train 4 Wheel

driver's airbags		passenger's airbags		seat belts	
front	Y	front	Y	3-point	N
side	N	side	N	2-point	N
				motorized	N

Incident(s)

Incident Number 1

failed component / part details

major assembly ELECTRICAL SYSTEM: IGNITION
description difficulty starting

location			number of	date of	mileage at	speed at	manufacturer	NHTSA
left/right	front/rear	original	failures	failure	failure	failure	contacted	contacted
NA	NA	Original	2	1/20/99	14000	0	N	N

incident details

accident	fire	airbags deployed driver's front	driver's side	passenger's front	passenger's side	number of persons injured	number of fatalities	estimated property damage	police report filed
N	N	N	N	N	N	0	0	$0	N

00000108

Incident Number 2

failed component / part details

major assembly AIR CONDITIONER

description growling noise when air is on and wheel is turned

location			number of	date of	mileage at	speed at	manufacturer	NHTSA
left/right	front/rear	original	failures	failure	failure	failure	contacted	contacted
NA	NA	Original		10/1/98	12000		N	N

incident details

		airbags deployed				number of	number of	estimated	police
accident	fire	driver's		passenger's		persons injured	fatalities	property damage	report filed
		front	side	front	side				
N	N	N	N	N	N	0	0	$0	N

Incident Number 3

failed component / part details

major assembly STEERING: WHEEL AND COLUMN

description scrapping noise when turning wheel

location			number of	date of	mileage at	speed at	manufacturer	NHTSA
left/right	front/rear	original	failures	failure	failure	failure	contacted	contacted
NA	NA	Original		10/1/98	12000		N	N

incident details

		airbags deployed				number of	number of	estimated	police
accident	fire	driver's		passenger's		persons injured	fatalities	property damage	report filed
		front	side	front	side				
N	N	N	N	N	N	0	0	$0	N

Incident Number 4

failed component / part details

major assembly BRAKES: AIR: ANTI-LOCK BRAKE SYSTEM (ABS)

description

location			number of	date of	mileage at	speed at	manufacturer	NHTSA
left/right	front/rear	original	failures	failure	failure	failure	contacted	contacted
NA	NA	Original	2	1/20/99	14900	20	N	N

incident details

		airbags deployed				number of	number of	estimated	police
accident	fire	driver's		passenger's		persons injured	fatalities	property damage	report filed
		front	side	front	side				
N	N	N	N	N	N	0	0	$0	N

Tire Information

DOT number **manufacturer**

name **size**

Comments

00000109

Vehicle Owner's Questionnaire 702899 submitted 2/3/99 1:59:58 PM

Owner Information

[redacted]

Have NHTSA send signature card for authorization? Yes

Vehicle Information

vin 4S2CK58W6W4374261
make Isuzu Truck model Rodeo year 1998
odometer 4371
purchase date 09/98 new or used? New body style SUV
dealer William Lehman Isuzu
21400 N.W. 2nd Ave.
Miami, FL 33169
305 6-53 -7111

engine size Uknow cylinders 6 fuel injection Y turbo N fuel type Gas
antilock br. Y cruise control Y drive train Rear

driver's airbags		passenger's airbags		seat belts	
front	Y	front	Y	3-point	Y
side	N	side	N	2-point	N
				motorized	N

Incident(s)

Incident Number 1

failed component / part details

major assembly BRAKES: HYDRAULIC: ANTI-LOCK BRAKE SYSTEM (ABS)
description

location left/right	location front/rear	original	number of failures	date of failure	mileage at failure	speed at failure	manufacturer contacted	NHTSA contacted
NA	NA	Original	2	1/15/99	4000	7	N	N

incident details

accident	fire	airbags deployed driver's front	driver's side	passenger's front	passenger's side	number of persons injured	number of fatalities	estimated property damage	police report filed
N	N	N	N	N	N	0	0	50	N

Tire Information

DOT number manufacturer
name size

00000110

Comments

My brakes have failed on two occasions. I took the Vehicle to the Dealer, where I purchased it. Before inspecting the vehicle, the mechanic assigned to the vehicle suggested it was operating as expected or designed and attributed the incidents to "wheel hop." Work on the vehicle was not completed on the 2nd and the vehicle has not been returned to me at this time. The first incident occurred shortly after I purchased the vehicle. I was at stop sign in a mall parking lot, at the top of a short, steep incline. After I pulled away from the stop sign, I pushed in the clutch, applied light braking pressure as the vehicle begin rolling down the incline, preparing to make a sharp right hand turn at the bottom of the hill. As the vehicle approached the crest of the incline, the right front tire hit a pot hole at slow speed. The brake pedal dropped significantly, the brakes felt like they released without vibration or pulsing and the vehicle rolled approximately one and one-half car lengths before stopping at the bottom of the incline. The second incident happened several weeks ago, after I had been in stop and go traffic for approximately forty minutes, with the headlights, air-conditioning and stereo on. I was creeping along in first or second gear, down an inclined overpass, I pushed in the clutch, applied light braking pressure, as the cars stacked up to get off the ramp. My Rodeo rolled over an expansion joint, at slow speed, the brake pedal dropped significantly, the brakes felt like they released without vibration or pulsing and the vehicle rolled freely about 3 to 5 ft before coming to a stop.

Vehicle Owner's Questionnaire 703147 submitted 2/10/99 6:25:58 PM

Owner Information

[redacted]

Have NHTSA send signature card for authorization? Yes

Vehicle Information

vin 4s2ck58w4w4311837
make Isuzu model Rodeo year 1998
odometer 23122
purchase date 12/97 new or used? New body style SUV
dealer Crest Isuzu
2701 North Central Expressway
Plano, TX 75075
214 5-16 -2371

engine size V6 cylinders fuel injection N turbo N fuel type Gas
antilock br. Y cruise control Y drive train Front

driver's airbags		passenger's airbags		seat belts	
front	Y	front	Y	3-point	N
side	N	side	N	2-point	N
				motorized	N

Incident(s)

Incident Number 1

failed component / part details

major assembly BRAKES: AIR: ANTI-LOCK BRAKE SYSTEM (ABS)
description

location			number of	date of	mileage at	speed at	manufacturer	NHTSA
left/right	front/rear	original	failures	failure	failure	failure	contacted	contacted
NA	NA	Original	100	1/1/98	500	15	Y	N

incident details

accident	fire	airbags deployed driver's front	driver's side	passenger's front	passenger's side	number of persons injured	number of fatalities	estimated property damage	police report filed
N	N	N	N	N	N				N

Tire Information

DOT number manufacturer
name size

00000112

Comments

The brakes have failed many, many times. I have had the vehicle in the dealership over 10 times. They have brought in an Isuzu design engineer and a Zone Manager. They couldn't find anything and said that they "officially give up". They told me they do NOT believe that there are problems with the brakes and that they don't know why I'm having the problems as others are not. They think it is just my lack of understanding about how ABS systems work - despite the fact that I have driven vehicles with ABS for many years. The Zone Manager was quite patronizing. The dealership has tried to be helpful, but I believe that they have been limited due to lack of information from Isuzu. Please contact me asap as this is a serious safety hazard. I would like to know what the status of the investigation is. Thank you.[redacted]

Form Approved: O.M.B. No. 2127-0008

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

Auto Safety Hotline

Vehicle Owner's Questionnaire

NATIONWIDE 1-800-424-9393
DC METRO AREA (202) 366-0123
INTERNET: http://www.nhtsa.dot.gov

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Date Received: 9 Feb 1999

Od_or ___
rt_dt ___
od_rt ___
up_ltr ___

Reference No. 834655

OWNER INFORMATION (Type or Print)

[redacted]

Work Number

Home Number [redacted]

Do you authorize NHTSA to provide a copy of this report to the manufacturer of your vehicle? ☐ YES ☐ NO
In the absence of an authorization, NHTSA WILL NOT provide your name and address to the vehicle manufacturer.

Signature of Owner _____ Date ___/___/___

VEHICLE INFORMATION

Vehicle Ident. No. (VIN.) (Located at bottom of windshield on driver's side)	Vehicle Make	Vehicle Model	Vehicle Year	Current Odometer Reading
	ISUZU TRUCK	RODEO	1995	

Purchase Date ☐ New ☒ Used

Dealer's Name _____ City _____ State _____ Zip Code _____

Engine Size (CID/CC/L) _____ No Cylinders _____ ☐ Turbo ☐ Diesel ☐ Gas ☐ Fuel Injection

Transmission Type: ☐ Manual ☐ Automatic

Antilock Brakes: ☒ Yes ☐ No

Restraint System: ☐ Driverside Airbag ☐ Motorbelt ☐ Passengerside Airbag ☐ 2-Point Belt ☐ 3-Point Belt

Cruise Control: ☐ Yes ☒ No

DriveTrain: ☐ Front ☐ Rear ☐ 4-Whee

Vehicle Type: ☐ Car ☐ Sports Util. ☐ Van ☐ Truck ☐ Minivan ☐ Motorcycle ☐ Other _____

Body Style: ☐ 2-Door ☐ 4-Door ☐ Station wagon ☐ Pick Up Truck ☒ Other _____

FAILED COMPONENT(S)/PART(S) INFORMATION

Component: 03250000

Part Name(s): BRAKES;HYDRAULIC;ANTI-SKID SYSTEM

Location: ☐ Left ☐ Right ☐ Front ☐ Rear

Failed Part(s): ☐ Original ☐ Replacement

No of Failures

Date(s) of Failure(s) _____
Mileage at Failure(s) _____
Vehicle Speed at failure(s) _____

Failed Part(s) Available? ☐ Yes ☐ No

NHTSA Previously Contacted? ☐ Yes ☐ No

APPLICABLE INCIDENT INFORMATION

(Please describe in detail the incident(s), Failure(s), Crash(es), and injury(ies) on the back of this form)

Crash	Fire	Number of Persons Injured	Number of Fatalities	Estimated Property Damage	Reported to Police
☒ Yes ☐ No	☐ Yes ☒ No				☐ Yes ☒ No

NARRATIVE DESCRIPTION OF FAILURE(S),INCIDENT(S),INJURY(IES)

WHEN APPLYING THE BRAKES PEDAL STAYS UP AND VEHICLE DOES NOT STOP. OWNER HIT ANOTHER VEHICLE BECAUSE OF ABS NOT WORKING PROPERLY. AFTER CRASH, THE ABS WARNING LIGHT CAME ON. DEALER SAID THERE WAS NOTHING WRONG. *AK

CONTINUE ON BACK IF NEEDED

The Privacy Act of 1974-Public Law 93-579 *This information is requested pursuant to authority vested in the National Highway Traffic Safety Act and subsequent amendments. You are under no obligation to respond to this questionnaire. Your response may be used to assist the NHTSA in determining whether a manufacturer should take appropriate action to correct a safety defect. If the NHTSA proceeds with administrative enforcement or litigation against a manufacturer, your response, or a statistical summary thereof, may be used in support of the agency's action.*

HS Form 360 Rev. 3/97)

00000114

Form Approved: O.M.B. No. 2127-0008

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

Auto Safety Hotline

Vehicle Owner's Questionnaire

NATIONWIDE 1-800-424-9393
DC METRO AREA (202) 366-0123
INTERNET: http://www.nhtsa.dot.gov

FOR AGENCY USE ONLY 125

Date Received: 18 Feb 1999

Od_or ___ ___
rt_dt ___ ___
od_rt ___ ___
up_ltr ___ ___

Reference No. 635017

OWNER INFORMATION (Type or Print)

[redacted] 502545

Work Number [redacted]

Home Number [redacted]

Do you authorize NHTSA to provide a copy of this report to the manufacturer of your vehicle? ☐ YES ☐ NO
In the absence of an authorization, NHTSA WILL NOT provide your name and address to the vehicle manufacturer.

Signature of Owner _____ Date ___/___/___

VEHICLE INFORMATION

Vehicle Ident. No. (VIN.) (Located at bottom of windshield on driver's side)	Vehicle Make	Vehicle Model	Vehicle Year	Current Odometer Reading
4SCM58W9W4332635	ISUZU TRUCK	RODEO	1998	

Purchase Date ☐ New ☒ Used

Dealer's Name _____
City _____ State _____ Zip Code _____

Engine Size (CID/CC/L) ____ No Cylinders ____
☐ Turbo ☐ Diesel ☐ Gas ☐ Fuel Injection

Transmission Type: ☐ Manual ☐ Automatic

Antilock Brakes: ☐ Yes ☒ No

Restraint System: ☐ Driverside Airbag ☐ Motorbelt ☐ Passengerside Airbag ☐ 2-Point Belt ☐ 3-Point Belt

Cruise Control: ☐ Yes ☒ No

DriveTrain: ☐ Front ☐ Rear ☐ 4-Wheel

Vehicle Type: ☐ Car ☐ Sports Ut. ☐ Van ☐ Truck ☐ Minivan ☐ Motorcycle ☐ Other _____

Body Style: ☐ 2-Door ☐ 4-Door ☐ Stationwagon ☒ Pick Up Truck ☐ Other _____

FAILED COMPONENT(S)/PART(S) INFORMATION

Component	Part Name(s)	Location	Failed Part(s)
03260060	BRAKES:HYDRAULIC:ANTI-SKID SYSTEM	☐ Left ☐ Right ☐ Front ☐ Rear	☐ Original ☐ Replacement

No of Failures

Date(s) of Failure(s) _____
Mileage at Failure(s) _____
Vehicle Speed at Failure(s) _____

Failed Part(s) Available? ☐ Yes ☐ No

NHTSA Previously Contacted? ☐ Yes ☐ No

APPLICABLE INCIDENT INFORMATION

(Please describe in detail the incident(s), Failure(s), Crash(es), and injury(ies) on the back of this form)

Crash	Fire	Number of Persons Injured	Number of Fatalities	Estimated Property Damage	Reported to Police
☐ Yes ☒ No	☐ Yes ☒ No				☐ Yes ☒ No

NARRATIVE DESCRIPTION OF FAILURE(S),INCIDENT(S),INJURY(IES)

WHEN APPLYING THE ABS BRAKES ON WET OR DRY PAVEMENT THE PEDAL GOES TO THE FLOOR, CAUSING EXTENDED STOPPING DISTANCE. PLEASE GIVE ANY FURTHER DETAILS. *AK

CONTINUE ON BACK IF NEEDED

The Privacy Act of 1974-Public Law 93-579 *This information is requested pursuant to authority vested in the National Highway Traffic Safety Act and subsequent amendments. You are under no obligation to respond to this questionnaire. Your response may be used to assist the NHTSA in determining whether a manufacturer should take appropriate action to correct a safety defect. If the NHTSA proceeds with administrative enforcement or litigation against a manufacturer, your response, or a statistical summary thereof, may be used in support of the agency's action.*

00000115

Vehicle Owner's Questionnaire 703162 submitted 2/10/99 11:44:50 PM

Owner Information

[redacted]

Have NHTSA send signature card for authorization? Yes

Vehicle Information

vin 4S2CM58W6W4332635
make Isuzu Truck **model** Rodeo **year** 1998
odometer 13900
purchase date 03/98 **new or used?** New **body style** 4-Door
dealer Open Road Honda
50 Route 1
Edison, NJ 08817
732 9-85 -0290

engine size 3.2L **cylinders** 6 **fuel injection** Y **turbo** N **fuel type** Gas
antilock br. Y **cruise control** Y **drive train** 4 Wheel

driver's airbags		passenger's airbags		seat belts	
front	Y	front	Y	3-point	Y
side	N	side	N	2-point	N
				motorized	N

Incident(s)

Incident Number 1

failed component / part details

major assembly BRAKES: HYDRAULIC: ANTI-LOCK BRAKE SYSTEM (ABS)
description /

location			number of	date of	mileage at	speed at	manufacturer	NHTSA
left/right	front/rear	original	failures	failure	failure	failure	contacted	contacted
NA	NA	Original	5	4/14/98	2000	5	Y	N

incident details

accident	fire	airbags deployed driver's front	driver's side	passenger's front	passenger's side	number of persons injured	number of fatalities	estimated property damage	police report filed
Y	N	N	N	N	N	0	0		Y

Tire Information

DOT number **manufacturer**
name **size**

00000116

Vehicle Owner's Questionnaire 704169 submitted 3/8/99 6:07:36 PM

Owner Information

[redacted]

Have NHTSA send signature card for authorization? Yes

Vehicle Information

vin 4S2CM58W5W4331928
make Isuzu model Rodeo year 1998
odometer 23000
purchase date 02/99 new or used? Used body style Sport Utility
dealer White Bear Acura Isuzu
3525 No. Highway 61
White Bear Lake, MN 55110
651 4-81 -7000

engine size cylinders 6 fuel injection Y turbo N fuel type Gas
antilock br. Y cruise control Y drive train 4 Wheel

driver's airbags		passenger's airbags		seat belts	
front	Y	front	Y	3-point	Y
side	N	side	N	2-point	N
				motorized	N

Incident(s)

Incident Number 1

failed component / part details

major assembly description BRAKES: HYDRAULIC SYSTEM

location left/right	location front/rear	original	number of failures	date of failure	mileage at failure	speed at failure	manufacturer contacted	NHTSA contacted
NA	NA	Original	1	3/7/99	23000	5	Y	N

incident details

accident	fire	airbags deployed driver's front	driver's side	passenger's front	passenger's side	number of persons injured	number of fatalities	estimated property damage	police report filed
Y	N	N	N	N	N	0	0	$400	N

Tire Information

DOT number manufacturer
name size

00000117

Comments

Turned left at a low rate of speed into an angled parking space in a parking lot; as the vehicle came to a near stop the brake pedal went all the way to the floor and the car lurched forward, striking another parked car. I clearly remember the brake pedal being depressed completely to the floor at impact. I put the car in park and then in reverse to back up - the brakes seemed to work at that point.

Vehicle Owner's Questionnaire 704422 submitted 3/14/99 5:27:11 PM

Owner Information

[redacted]

Have NHTSA send signature card for authorization? Yes

Vehicle Information

vin 4s2ck58w7w4332522
make ISUZU model RODEO year 1998
odometer 23000
purchase date 02/98 new or used? New body style 4-Door
dealer Chapman ISUZU
1717 E. BASELINE RD.
Tempe, AZ 85283-1408
602 8-38 -0810

engine size 3.2L cylinders 6 fuel injection Y turbo N fuel type Gas
antilock br. Y cruise control Y drive train Rear

driver's airbags		passenger's airbags		seat belts	
front	Y	front	Y	3-point	Y
side	N	side	N	2-point	N
				motorized	N

Incident(s)

Incident Number 1

failed component / part details

major assembly description BRAKES: HYDRAULIC: ANTI-LOCK BRAKE SYSTEM (ABS)

location left/right	location front/rear	original	number of failures	date of failure	mileage at failure	speed at failure	manufacturer contacted	NHTSA contacted
NA	NA	Original	5	3/10/99	22000	55	N	N

incident details

accident	fire	airbags deployed driver's front	driver's side	passenger's front	passenger's side	number of persons injured	number of fatalities	estimated property damage	police report filed
N	N	N	N	N	N	0	0	50	N

Tire Information

DOT number manufacturer
name size

00000119

Comments

At any speed if I were to apply the brakes with normal pedal pressure while one or both front wheels is traveling over an imperfection in the road or small hole the brakes seem to fail to the point that the vehicle seems to have NO BRAKES. The vehicle feels like it just loses the effect of the brakes. The pedal feel is that it seems to move a little close to the floor and the feeling of the ABS pulsating is felt during the instance but the vehicle isnt proceeding to slow down until the wheel(s) stop bouncing or revbounding from the imperfection in the road then the vehicle tends to slow down. In one instance I let up on the brake pedal and re-applied it firmer and the front wheels locked up. The pedal never seems to go to the floor as in a loss of pressure it just gets sponging and you feel the ABS pulsating thru the pedal and the vehicle doesnt slow down. I am just thankfull that this hasnt led to my family and I getting into an accident. Thank you for your time SCOTT.

Vehicle Owner's Questionnaire 701681 submitted 12/29/98 2:48:35 AM

Owner Information

[redacted]

Have NHTSA send signature card for authorization? Yes

Vehicle Information

vin 4S2CK58W1W4354046
make Isuzu model Rodeo year 1998
odometer 7049
purchase date 07/98 new or used? New body style None Supplied
dealer Volkswagon/Isuzu Dealer
Hawthorne Blvd.
Torrance, CA

engine size cylinders 6 fuel injection N turbo N fuel type Gas
antilock br. N cruise control N drive train Front

driver's airbags		passenger's airbags		seat belts	
front	Y	front	Y	3-point	N
side	N	side	N	2-point	N
				motorized	N

Incident(s)

Incident Number 1

failed component / part details

major assembly BRAKES: HYDRAULIC: ANTI-LOCK BRAKE SYSTEM (ABS)
description

location			number of	date of	mileage at	speed at	manufacturer	NHTSA
left/right	front/rear	original	failures	failure	failure	failure	contacted	contacted
NA	NA	Original	16	7/3/98	10	20	Y	N

incident details

accident	fire	airbags deployed driver's front	driver's side	passenger's front	passenger's side	number of persons injured	number of fatalities	estimated property damage	police report filed
N	N	N	N	N	N				N

Tire Information

DOT number manufacturer
name size

00000121

Vehicle Owner's Questionnaire 702919 submitted 2/3/99 11:14:48 PM

Owner Information

[redacted]

Have NHTSA send signature card for authorization? Yes

Vehicle Information

vin 4S2CK58W1W4316817
make ISUZU model RODEO year 1998
odometer 12223
purchase date 10/98 new or used? New body style SUV
dealer Don Bohn Isuzu, INC. Dealer# 630H
3737 Lapalco Blvd.
harvey, LA 70058
504 3-47 -7000
engine size 3.2 LIT cylinders 6 fuel injection Y turbo N fuel type Gas
antilock br. Y cruise control Y drive train Rear

driver's airbags		passenger's airbags		seat belts	
front	Y	front	Y	3-point	Y
side	N	side	N	2-point	N
				motorized	N

Incident(s)

Incident Number 1

failed component / part details

major assembly description BRAKES: HYDRAULIC: ANTI-LOCK BRAKE SYSTEM (ABS)

location left/right	location front/rear	original	number of failures	date of failure	mileage at failure	speed at failure	manufacturer contacted	NHTSA contacted
NA	NA	Original	1	1/12/99	11500	35	Y	N

incident details

accident	fire	airbags deployed driver's front	driver's side	passenger's front	passenger's side	number of persons injured	number of fatalities	estimated property damage	police report filed
N	N	N	N	N	N			$0	N

Tire Information

DOT number manufacturer
name size

00000122

Vehicle Owner's Questionnaire 704895 submitted 3/25/99 10:04:30 AM

Owner Information

[redacted]

Have NHTSA send signature card for authorization? Yes

Vehicle Information

vin 4S2CK58W3W4354940
make ISUZU model RODEO year 1998
odometer 5600
purchase date 10/98 new or used? New body style 4-Door
dealer FIRST TEAM ISUZU
1800 GREENBRIER PARKWAY
CHESAPEAKE, VA 23320
757 4-20 -5450

engine size cylinders 6 fuel injection Y turbo N fuel type Gas
antilock br. Y cruise control Y drive train Front

driver's airbags		passenger's airbags		seat belts	
front	Y	front	Y	3-point	N
side	N	side	N	2-point	N
				motorized	N

Incident(s)

Incident Number 1

failed component / part details

major assembly description BRAKES: HYDRAULIC: MASTER CYLINDER

location			number of	date of	mileage at	speed at	manufacturer	NHTSA
left/right	front/rear	original	failures	failure	failure	failure	contacted	contacted
NA	NA	Original	2	3/11/99	5600	15	Y	N

incident details

accident	fire	airbags deployed driver's front	driver's side	passenger's front	passenger's side	number of persons injured	number of fatalities	estimated property damage	police report filed
Y	N	N	N	N	N	0	0	$1,800	Y

Tire Information

DOT number manufacturer
name size

00000123

Vehicle Owner's Questionnaire 704895 submitted 3/25/99 10:04:30 AM

Comments

I was traveling down the road and when I hit the brakes the vehicle did not respond. I took it to Meineke for an ispection and they reported a failure in the master cylinder. When I brought it to the dealer they claimed the brake pedal should be able to touch the floor and then proceeded with no response. I tried to contact Isuzu Customer relations and they would not talk to me.

Form Approved: O.M.B. No. 2127-0008

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

Auto Safety Hotline

Vehicle Owner's Questionnaire

NATIONWIDE 1-800-424-9393
DC METRO AREA (202) 366-0123
INTERNET: http://www.nhtsa.dot.gov

FOR AGENCY USE ONLY 197

Date Received: 26-MAR-1999

Od_or
rt_alt
od_rt
up_ltr

Reference No. 836207

OWNER INFORMATION (Type or Print)

[redacted] 512100

Work Number

Home Nun[redacted]

Do you authorize NHTSA to provide a copy of report to the manufacturer of your vehicle? ☐ YES ☐ NO
In the absence of an authorization, NHTSA WILL NOT provide your name and address to the vehicle manufacturer.

Signature of Owner _____ Date ___/___/___

VEHICLE INFORMATION

Vehicle Ident. No. (VIN) (Located at bottom of windshield on driver's side)	Vehicle Make	Vehicle Model	Vehicle Year	Current Odometer Reading
4S6CK58W6W4409896	HONDA TRUCK	PASSPORT	1998	

Purchase Date: ☐ New ☒ Used

Dealer's Name _____
City _____ State _____ Zip Code _____

Engine Size (CID/CC/L) _____
No Cylinders _____

☐ Turbo ☐ Diesel ☐ Gas ☐ Fuel Injection

Transmission Type	Antilock Brakes	Restraint System	Cruise Control	Drive Train	Vehicle Type	Body Style
☐ Manual ☐ Automatic	☒ Yes ☐ No	☐ 3-Point Belt ☐ Motorbelt ☐ Driverside Airbag ☒ 2-Point Belt ☐ Passengerside Airbag	☐ Yes ☒ No	☐ Front ☐ Rear ☐ 4-Wheel	☐ Car ☐ Sport Ut ☐ Van ☐ Truck ☐ Minivan ☐ Motorcycle ☐ Other	☐ 2-Door ☐ 4-Door ☐ Stationwagon ☐ Pick Up Truck ☒ Other

FAILED COMPONENT(S)/PART(S) INFORMATION

Component	Part Name(s)	Location	Failed Part(s)
03250000	BRAKES:HYDRAULIC:ANTI-SKID SYSTEM	☐ Left ☐ Right ☐ Front ☐ Rear	☐ Original ☐ Replacement

No of Failures	Date(s) of Failure(s) / Mileage at Failure(s) / Vehicle Speed at Failure(s)	Failed Part(s) Available?	NHTSA Previously Contacted?
36	Mileage at Failure(s): 9500; Vehicle Speed at Failure(s): 50	☐ Yes ☐ No	☐ Yes ☐ No

APPLICATION INCIDENT INFORMATION

(Please describe in detail the incident(s), Failure(s), Crash(es), and Injury(ies) on the back of this form)

Crash	Fire	Number of Persons Injured	Number of Fatalities	Estimated Property Damage	Reported to Police
☐ Yes ☒ No	☐ Yes ☒ No	0	0		☐ Yes ☒ No

NARRATIVE DESCRIPTION OF FAILURE(S), INCIDENT(S), INJURY(IES)

WHEN CONSUMER STEPPED ON BRAKE PEDAL TO STOP OR REDUCE SPEED, BRAKES DIDN'T STOP STOP VEHICLE OR REDUCE SPEED, ESPECIALLY AFTER PASSING A BUMP. *AK

CONTINUE ON BACK IF NEEDED

The Privacy Act of 1974-Public Law 93-579 This information id requested pursuant to authority vested in the National Highway Traffic Safety Act and subsequent amendments. You are under no obligation respond to this questionnaire. Your response may be used to assist the NHTSA in determining whether a manufacturer should take approiate action to correct a safety defect. If the NHTSA proceeds with administrative enforcement or litigation against a manufacturer, your response, or a statistical summary thereof, may be used in support of the agency's action.

Vehicle Owner's Questionnaire 705138 submitted 3/31/99 10:54:08 AM

Owner Information

[redacted]

Have NHTSA send signature card for authorization? Yes

Vehicle Information

vin 4s2ck58w4w4307707
make Isuzu model Rodeo year 1998
odometer 20000
purchase date 12/97 new or used? New body style suv
dealer Boomershine Isizu
2970 Old Norcross Rd.
Duluth, GA 30136
770 6-22 -6152

engine size 204 cylinders 6 fuel injection Y turbo N fuel type Gas
antilock br. Y cruise control Y drive train Front

driver's airbags		passenger's airbags		seat belts	
front	Y	front	Y	3-point	Y
side	N	side	N	2-point	N
				motorized	N

Incident(s)

Incident Number 1

failed component / part details

major assembly BRAKES: AIR: ANTI-LOCK BRAKE SYSTEM (ABS)
description

location left/right	location front/rear	original	number of failures	date of failure	mileage at failure	speed at failure	manufacturer contacted	NHTSA contacted
NA	NA	Original	1	1/8/99	19600	40	Y	N

incident details

accident	fire	airbags deployed driver's front	driver's side	passenger's front	passenger's side	number of persons injured	number of fatalities	estimated property damage	police report filed
Y	N	N	N	N	N	0	0	$3,000	Y

Tire Information

DOT number manufacturer
name size

00000126

Vehicle Owner's Questionnaire 705138 submitted 3/31/99 10:54:08 AM

Comments

Brakes failed on wet pavement with front wheels skipping.

Form Approved: O.M.B. No. 2127-0008

US Department of Transportation
National Highway Traffic Safety Administration

AUTO SAFETY HOTLINE
VEHICLE OWNER'S QUESTIONNAIRE

NATIONWIDE 1-800-424-9393
DC METRO AREA 202-366-0123

FOR AGENCY USE ONLY

DATE RECEIVED RECEIVED 99 APR -7 AM 10: 25 OFFICE DEFECTS INVESTIGATION

REFERENCE NO. 544843

OWNER INFORMATION (TYPE OR PRINT)

NAME and AD

DAY TIME TELEPHONE NO. (A

Do you authorize NHTSA to provide a copy of this report to the manufacturer of your vehicle? YES [X] NO [ ]
In the absence of an authorization, NHTSA WILL NOT provide your name or address to the vehicle manufacturer.

SIGNATURE OF OWNER

DATE 3/27/99

VEHICLE INFORMATION

VEHICLE IDENTIFICATION NO.*	VEHICLE MAKE	VEHICLE MODEL	MODEL YEAR
4S2CM58W2W4344765	Isuzu	Rodeo	1998

*LOCATED AT BOTTOM OF WINDSHIELD ON DRIVER'S SIDE

CURRENT ODOMETER READING: 11,200

DATE PURCHASED 9-98 [X] NEW [ ] USED

DEALER'S NAME, CITY & STATE: Richards Isuzu Rt 9 Freehold, NJ.

ENGINE SIZE (CID/CC/L) 2.0L NO. CYLINDERS 6 [ ] TURBO [ ] DIESEL [X] GAS [X] FUEL INJECTN

TRANSMISSION TYPE: [ ] MANUAL [X] AUTOMATIC

ANTILOCK BRAKES: [X] YES [ ] NO

RESTRAINT SYSTEM: [X] DRIVERSIDE AIRBAG [ ] MOTORBELT [X] PASSENGERSIDE AIRBAG [X] 3-POINT BELT [ ] 2-POINT BELT

CRUISE CONTROL: [X] YES [ ] NO

DRIVETRAIN: [ ] FRONT [ ] REAR [X] 4-WHEEL

BODY STYLE: STAWAG 4 DR [X] 2 DR [ ] HATCH BK [ ] VAN [ ] PK UP TRK [ ] OTHER

FAILED COMPONENT(S)/PART(S) INFORMATION (REPORT TIRE INFORMATION ON BACK)

COMPONENT	PART NAME(S)	LOCATION	FAILED PART(S)
Brakes	Brakes	[X] LEFT [X] FRONT [X] RIGHT [X] REAR	[X] ORIGINAL [ ] REPLACEMENT

NO. OF FAILURES: 1 which caused an accident

DATE(S) OF FAILURE(S): 2-28-99

MILEAGE AT FAILURE(S): 11,200

VEHICLE SPEED AT FAILURE(S): 15 MPH

MANUFACTURER CONTACTED: [ ] YES [X] NO

NHTSA PREVIOUSLY CONTACTED: [ ] YES [X] NO

APPLICABLE ACCIDENT INFORMATION

ACCIDENT	FIRE	NUMBER PERSONS INJURED	NUMBER OF FATALITIES	PROPERTY DAMAGE ESTS $	POLICE REPORTED
[X] YES [ ] NO	[ ] YES [X] NO	1	0	2,000	[X] YES [ ] NO

NARRATIVE DESCRIPTION OF FAILURE(S), ACCIDENT(S), INJURY(IES)

Brakes applied approaching intersection — Brakes Failed to properly work causing vehicle to enter intersection and collide with another vehicle.

CONTINUE ON BACK IF NEEDED

The Privacy Act of 1974
Public Law 93-579
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HS-Form 350 (Rev. 5-92)

00000128 S.S.

Vehicle Owner's Questionnaire 704519 submitted 3/16/99 4:38:35 PM

Owner Information

[redacted]

Have NHTSA send signature card for authorization? Yes

Vehicle Information

vin 4S2CK58W1X4321355
make Isuzu model Rodeo year 1999
odometer 7000
purchase date 12/98 new or used? New body style SUV
dealer Buzz Post
1500 W. I-20
Arlington, TX 76017
817 4-67 -1234

engine size 3.2 cylinders 6 fuel injection N turbo N fuel type Gas
antilock br. Y cruise control Y drive train Rear

driver's airbags		passenger's airbags		seat belts	
front	Y	front	Y	3-point	N
side	N	side	N	2-point	N
				motorized	N

Incident(s)

Incident Number 1

failed component / part details

major assembly BRAKES: AIR: ANTI-LOCK BRAKE SYSTEM (ABS)
description

location			number of	date of	mileage at	speed at	manufacturer	NHTSA
left/right	front/rear	original	failures	failure	failure	failure	contacted	contacted
NA	NA	Original	10			40	N	N

incident details

		airbags deployed							
		driver's		passenger's		number of	number of	estimated	police
accident	fire	front	side	front	side	persons injured	fatalities	property damage	report filed
N	N	N	N	N	N	0	0	$0	N

Tire Information

DOT number manufacturer
name size

00000129

Comments

Everytime the brake is applied and the vehicle hits a bump, the ABS disengages the brake and waits for 1-2 seconds before engages the brake again. This converts to quite a bit of lost braking distance. As drivers, we cannot keep monitoring the surface of the road when applying the brakes. During that 1-2 second window, there is always a sound similar to someone dropping a basketball to a concrete floor from about knee level. As the ball bounces back, it does not travel as high as before; therefore, the frequency of the sound becomes faster until it stops. By the time the sound stops, the brake engages again. I think there is faulty brake mechanism that causes this sound and the ABS failure. I have spoken to the service manager of Isuzu and he mentioned that that is the way ABS works. Please advise.

Vehicle Owner's Questionnaire 705773 submitted 4/19/99 5:11:32 PM

Owner Information

[redacted]

Have NHTSA send signature card for authorization? Yes

Vehicle Information

vin 4S2CM58W2X4315381
make ISUZU model RODEO year 1999
odometer 200
purchase date 04/99 new or used? New body style 4 DOOR SUV
dealer Tamaroff
28585 Telegraph Rd.
Southfield, MI 48034
248 3-53 -1300

engine size 3.2L cylinders 6 fuel injection Y turbo N fuel type Gas
antilock br. N cruise control Y drive train 4 Wheel

driver's airbags		passenger's airbags		seat belts	
front	Y	front	Y	3-point	Y
side	N	side	N	2-point	N
				motorized	N

Incident(s)

Incident Number 1

failed component / part details

major assembly description BRAKES: HYDRAULIC: ANTI-LOCK BRAKE SYSTEM (ABS)

location left/right	location front/rear	original	number of failures	date of failure	mileage at failure	speed at failure	manufacturer contacted	NHTSA contacted
NA	NA	Original	1	4/12/99	200	7	Y	N

incident details

accident	fire	airbags deployed driver's front	driver's side	passenger's front	passenger's side	number of persons injured	number of fatalities	estimated property damage	police report filed
Y	N	N	N	N	N	0	0	$2,500	Y

Tire Information

DOT number manufacturer
name size

00000131

Comments

New Car, 7days old. Driving up to a Stop light. The vehicle slowed but would not stop. Crashed into car in front of me at 5 to 10 MPH. When I was slowing down, I had time to look down to see if my foot was on the pedal (which it was), then with both feet tried to get the vehicle to stop with no luck. Crash! Neither Airbag was deployed and no one was hurt.

Form Approved: O.M.B. No. 2127-0[illegible]

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

Auto Safety Hotline

Vehicle Owner's Questionnaire

NATIONWIDE 1-800-424-9393
DC METRO AREA (202) 366-0123
INTERNET: http://www.nhtsa.dot.gov

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Date Received: 10 Dec 1998

Od_or ___
rt_dt ___
od_it ___
up_ltr ___

Reference No. 832140

OWNER INFORMATION (Type or Print)

489330

Work Number

Home Number

Do you authorize NHTSA to provide a copy of this report to the manufacturer of your vehicle? ☐ YES ☐ NO
In the absence of an authorization, NHTSA WILL NOT provide your name and address to the vehicle manufacturer.

Signature of Owner _____ Date ___/___/___

VEHICLE INFORMATION

Vehicle Ident. No. (VIN.) (Located at bottom of windshield on driver's side)	Vehicle Make	Vehicle Model	Vehicle Year	Current Odometer Reading
4S2CK57D5W4351733	ISUZU TRUCK	AMIGO	1998	

Purchase Date

☐ New ☒ Used

Dealer's Name _____
City _____ State _____ Zip Code _____

Engine Size (CID/CC/L) ____
No. Cylinders ____
☐ Turbo ☐ Diesel ☐ Gas ☐ Fuel Injection

Transmission Type: ☐ Manual ☐ Automatic

Antilock Brakes: ☒ Yes ☐ No

Restraint System: ☐ Driverside Airbag ☐ Motorbelt ☐ Passengerside Airbag ☐ 2-Point Belt ☐ 3-Point Belt

Cruise Control: ☐ Yes ☒ No

DriveTrain: ☐ Front ☐ Rear ☐ 4-Wheel

Vehicle Type: ☐ Car ☐ Sports Ut. ☐ Van ☐ Truck ☐ Minivan ☐ Motorcycle ☐ Other _____

Body Style: ☐ 2-Door ☐ 4-Door ☐ Stationwagon ☐ Pick Up Truck ☐ Other _____

FAILED COMPONENT(S)/PART(S) INFORMATION

Component: 03250000

Part Name(s): BRAKES:HYDRAULIC:ANTI-SKID SYSTEM

Location: ☐ Left ☐ Right ☐ Front ☐ Rear

Failed Part(s): ☐ Original ☐ Replacement

No of Failures

Date(s) of Failure(s) _____
Mileage at Failure(s) _____
Vehicle Speed at failure(s) _____

Failed Part(s) Available? ☐ Yes ☐ No

NHTSA Previously Contacted? ☐ Yes ☐ No

APPLICABLE INCIDENT INFORMATION

(Please describe in detail the incident(s), Failure(s), Crash(es), and injury(ies) on the back of this form)

Crash	Fire	Number of Persons Injured	Number of Fatalities	Estimated Property Damage	Reported to Police
☒ Yes ☐ No	☐ Yes ☒ No				☐ Yes ☒ No

NARRATIVE DESCRIPTION OF FAILURE(S),INCIDENT(S),INJURY(IES)

WHEN APPLYING THE ABS BRAKES ON DRY PAVEMENT THE PEDAL TRAVELED TO THE FLOOR, CAUSING EXTENDED STOPPING DISTANCE WHICH RESULTED IN A COLLISION. PLEASE GIVE ANY FURTHER DETAILS.*AK

CONTINUE ON BACK IF NEEDED

The Privacy Act of 1974-Public Law 93-579 *This information is requested pursuant to authority vested in the National Highway Traffic Safety Act and subsequent amendments. You are under no obligation to respond to this questionnaire. Your response may be used to assist the NHTSA in determining whether a manufacturer should take appropriate action to correct a safety defect. If the NHTSA proceeds with administrative enforcement or litigation against a manufacturer, your response, or a statistical summary thereof, may be used in support of the agency's action.*

Vehicle Owner's Questionnaire 703498 submitted 2/19/99 11:04:08 AM

Owner Information

[redacted]

Have NHTSA send signature card for authorization? No

Vehicle Information

vin 4S2CM57W1W4361705
make Isuzu model Amigo year 1998
odometer 5500
purchase date 10/98 new or used? New body style SUV
dealer Zinbrick Inc
1601 West Beltline Hwy
Madison, WI 53713
800 3-62 -5497

engine size 3.2L cylinders 6 fuel injection Y turbo N fuel type Gas
antilock br. Y cruise control Y drive train 4 Wheel

driver's airbags		passenger's airbags		seat belts	
front	Y	front	Y	3-point	Y
side	N	side	N	2-point	N
				motorized	N

Incident(s)

Incident Number 1

failed component / part details

major assembly description BRAKES: HYDRAULIC: ANTI-LOCK BRAKE SYSTEM (ABS)

location left/right	location front/rear	original	number of failures	date of failure	mileage at failure	speed at failure	manufacturer contacted	NHTSA contacted
NA	NA	Original	1	2/17/99	5400	35	N	N

incident details

accident	fire	airbags deployed driver's front	driver's side	passenger's front	passenger's side	number of persons injured	number of fatalities	estimated property damage	police report filed
N	N	N	N	N	N	0	0	$0	N

Tire Information

DOT number manufacturer
name size

00000134

Vehicle Owner's Questionnaire 703498 submitted 2/19/99 11:04:08 AM

Comments

While braking downhill I hit a bump and the pedal moved toward the floor. Stopping distance seemed to increase more than I suspected. If there had been a vehicle in front of me I may have hit it.

Vehicle Owner's Questionnaire 704399 submitted 3/13/99 5:56:46 PM

Owner Information

[redacted]

Have NHTSA send signature card for authorization? Yes

Vehicle Information

vin 4S2CK57D4W4345552
make ISUZU **model** AMIGO **year** 1998
odometer 22567
purchase date 04/98 **new or used?** New **body style** 2-Door
dealer JIM REED CHEVROLET SUBARU ISUZU
1512 BROADWAY
NASHVILLE, TN 37203
615 3-19 -2971

engine size 2.2 L **cylinders** 4 **fuel injection** Y **turbo** N **fuel type** Gas
antilock br. Y **cruise control** N **drive train** Rear

driver's airbags		passenger's airbags		seat belts	
front	Y	front	Y	3-point	Y
side	N	side	N	2-point	N
				motorized	N

Incident(s)

Incident Number 1

failed component / part details

major assembly description ELECTRICAL SYSTEM: WIRING: REAR COMPARTMENT

location			number of	date of	mileage at	speed at	manufacturer	NHTSA
left/right	front/rear	original	failures	failure	failure	failure	contacted	contacted
NA	Rear	Original	1	4/20/98	1000	0	Y	N

incident details

accident	fire	airbags deployed driver's front	driver's side	passenger's front	passenger's side	number of persons injured	number of fatalities	estimated property damage	police report filed
N	N	N	N	N	N				N

00000136

Incident Number 2

failed component / part details

major assembly description: BRAKES: HYDRAULIC: ANTI-LOCK BRAKE SYSTEM (ABS)

location left/right	location front/rear	original	number of failures	date of failure	mileage at failure	speed at failure	manufacturer contacted	NHTSA contacted
Right	NA	Original	6	1/28/99	19855	25	Y	N

incident details

accident	fire	airbags deployed driver's front	driver's side	passenger's front	passenger's side	number of persons injured	number of fatalities	estimated property damage	police report filed
Y	N	N	N	N	N	0	0	$0	N

Tire Information

DOT number manufacturer
name size

Comments

When driving on wet pavement, mostly on hills, the ABS starts up and allows my car to free wheel for about 10 to 20 FEET before braking begins again. I AM NOT LETTING UP ON THE PEDAL. The first time the ABS started up it worked great, I heard a motor running under the hood and even on the snow I stopped fine. This motor does function when 12vdc is applied but as of late, no longer functions when the abs is started, the problem must be in the controling module it is failing to start the motor. I have been into the ditch 6 times total and I am just waiting to get into a very bad accident. I did notice that other cars next to me under the same conditions are able to stop. This lead me to this little test I conducted. When I Disable the ABS my car stops fine. In fact in a parking lot with the ABS off from a speed of 30 mph the car will stop on average 45% shorter than when the abs is started. The rear tires did lock up just before coming to a complete stop with the abs off. I tested 10 times with each condition (10 WITH ABS AND 10 WITHOUT ABS) and then averaged resulting stopping distance. The tests werer done on wet pavement caused by rain. The dealership states that they have checked everything and the system is fine(JAN 29 1999). If the dealer is correct and no problem exsists the system itself is not good enough. Sure I can still steer the car and there is no danger of LOCKING the tires (OR STOPPING THIS CAR) but around here if I steer off the road in order to miss something it usually ends you up in a large ditch or off a cliff. This type of performance is not acceptable and is actually a hazzardf to everyone on the highway. How can you guys allow such a poor product to remain on the road. My car is currently equipped with a KELSE HAYSE unit. Until I can find an option that works as I really liked the way the brakes worked on the snow. The over head dome light blinks on and off when going up hill. This I can live with.

KIRKLAND & ELLIS
PARTNERSHIPS INCLUDING PROFESSIONAL CORPORATIONS

655 Fifteenth Street, N.W.
Washington, D.C. 20005

202 879-5000

Facsimile:
202 879-5200

John Gibson Mullan
To Call Writer Directly:
(202) 879-5048

August 16, 2000

Ms. Kathleen C. DeMeter
Director, Office of Defects Investigation
National Highway Traffic Safety Administration
Room 5236K
400 Seventh Street
Washington DC 20590
EA99-008SGS

Re: EA 99-008

Dear Ms. DeMeter:

As requested by Mr. Shadle of your staff, Isuzu Motors America, Inc. ("Isuzu America") is providing unredacted copies of the complaints submitted to NHTSA on July 30, 1999 (DET-99-089) in connection with the subject investigation as well as unredacted copies of the complaints received since that response. Isuzu America does so in reliance on your assurances that the government needs access to this information in order to complete its investigation, and that it will not disclose to the public or include in the public record information ordinarily kept private by the agency, such as names, addresses, telephone numbers and other personal details included in the complaints.

Very truly yours,

John Gibson Mullan

John Gibson Mullan

JGM:mcc
Enclosure

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CERTIFIED MAIL
RETURN RECEIPT REQUESTED JUL 2 2001

Yoshiyuki Ishihara, Chief Representative
Emissions and Safety
Isuzu Motors America, Inc.
46401 Commerce Center Drive
Plymouth, MI 48170-2473

NSA-13sgs
EA99-008

Dear Mr. Ishihara:

The Office of Defects Investigation (ODI) of the National Highway Traffic Safety Administration (NHTSA) has reviewed the information Isuzu Motors America, Inc. (Isuzu) submitted in response to ODI's May 13, 1999 Information Request (EAIR) issued as part of its Engineering Analysis (EA99-008), as well as additional information presented to ODI by Isuzu at meetings on June 14, 2000, January 16, 2001, February 6, 2001, March 2, 2001, April 5, 2001 and April 17, 2001, related to alleged degradation in braking performance on certain 1998 and 1999 Isuzu Rodeo, Isuzu Amigo and Honda Passport vehicles. As a result of that review, this letter requests additional information from Isuzu.

Since our previous Information Requests, this office has become aware of an additional 162 reports from 146 owners that allege braking performance problems in the subject vehicles. Since additional information has been received from a number of owners whose reports have previously been forwarded to Isuzu, a copy of each of the 215 reports (received from 192 owners) received by ODI alleging braking performance problems in the subject vehicles is enclosed for your information.

Unless otherwise stated in the text, the following definitions apply to this Information Request:

- **Subject vehicles**: all 1998 through 2000 model year Isuzu Rodeo and Honda Passport vehicles, and all 1998 through 2000 model year Isuzu Amigo vehicles equipped with a four-wheel antilock brake system.

- **Isuzu**: Isuzu Motors America, Inc. and Isuzu Motors Limited and all of their divisions, subsidiaries (whether or not incorporated), and affiliated enterprises, both foreign and domestic, all headquarters, regional, zone, and other offices of Isuzu Motors America, Inc. and Isuzu Motors Limited or any of their divisions, subsidiaries, and affiliated enterprises, all past and present officers and employees of Isuzu Motors America, Inc. and Isuzu Motors Limited or any of their divisions, subsidiaries, and affiliated enterprises, and all agents, contractors, consultants, attorneys, law firms, and other

persons or entities engaged directly or indirectly (for example, as an employee of a consultant) by, or under the control of, Isuzu Motors America, Inc. and Isuzu Motors Limited or any of their divisions, subsidiaries, or affiliated enterprises, who are or, in or after 1997, were involved in any way with any of the following related to the alleged defect in the subject vehicles:
(a) design, engineering, analysis, modification or production(e.g., quality control)
(b) testing, assessment or evaluation;
(c) consideration, or recognition of potential or actual defects, reporting record-keeping, and information management, (e.g., complaints, field reports, warranty information, part sales), analysis, claims, or lawsuits; or
(d) communication to, from or available to zone representatives, fleets, dealers, or other field locations, including but not limited to persons who have the capacity to obtain information from dealers.

- **Alleged defect**: degraded braking performance characterized by a perceived loss of braking capability on the part of the vehicle operator, including, but not limited to, situations in which vehicle owners or operators describe themselves as having experienced any of the following: extended stopping distance, no braking ability, no brakes, brakes release, loss of brakes, brakes disengage, brakes fail, or brake failure.

- **Antilock brake system**: that portion of the brake system that monitors and controls the rotational slip of the tire/wheel assemblies during braking and that includes a hydraulic modulator, an electronic control unit and related wiring and electrical connectors, wheel speed sensors and related mounting brackets, wiring and electrical connectors, hydraulic lines/hoses and related hydraulic connectors, hydraulic proportioning valve(s), and any other components that either provide inputs/signals to the electronic control unit or affect the hydraulic brake fluid pressure within the foundation brake system during braking.

- **Foundation brake system**: that portion of brake system that includes the brake rotors, brake calipers, brake friction pads, brake drums, brake backing plates, wheel cylinders, brake friction linings, braking lining adjuster assemblies, and related mounting brackets, pins, clips, springs and anchors.

- **Document:** "Document(s)" is used in the broadest sense of the word and shall mean all original written, printed, typed, recorded, or graphic matter whatsoever, however produced or reproduced, of every kind, nature, and description, and all nonidentical copies of both sides thereof, including, but not limited to, papers, letters, memoranda, correspondence, communications, electronic mail (e-mail) messages (existing in hard copy and/or in electronic storage), faxes, mailgrams, telegrams, cables, telex messages, notes, annotations, working papers, drafts, minutes, records, audio and video recordings, data, databases, other information bases, summaries, charts, tables, graphics, other visual displays, photographs, statements, interviews, opinions, reports, newspaper

articles, studies, analyses, evaluations, interpretations, contracts, agreements, jottings, agendas, bulletins, notices, announcements, instructions, blueprints, drawings, as-builts, changes, manuals, publications, work schedules, journals, statistical data, desk, portable and computer calendars, appointment books, diaries, travel reports, lists, tabulations, computer printouts, data processing program libraries, data processing inputs and outputs, microfilms, microfiches, statements for services, resolutions, financial statements, governmental records, business records, personnel records, work orders, pleadings, discovery in any form, affidavits, motions, responses to discovery, all transcripts, administrative filings and all mechanical, magnetic, photographic and electronic records or recordings of any kind, including any storage media associated with computers, including, but not limited to, information on hard drives, floppy disks, backup tapes, and zip drives, electronic communications, including but not limited to, the Internet and shall include any drafts or revisions pertaining to any of the foregoing, all other things similar to any of the foregoing, however denominated by Isuzu, any other data compilations from which information can be obtained, translated if necessary, into a usable form and any other documents. For purposes of this request, any document which contains any note, comment, addition, deletion, insertion, annotation, or otherwise comprises a nonidentical copy of another document shall be treated as a separate document subject to production. In all cases where original and any non-identical copies are not available, "document(s)" also means any identical copies of the original and all non-identical copies thereof. Any document, record, graph, chart, film or photograph originally produced in color must be provided in color. Furnish all documents whether or not verified by Isuzu. If a document is not in the English language, provide both the original document and an English translation of the document.

In order for my staff to evaluate the alleged defect, certain information is required. Pursuant to 49 U.S.C. § 30166, please provide numbered responses to the following requests. Please repeat the applicable request verbatim above each response. After Isuzu's response to each request, identify the source of the information, and indicate the last date the source updated the information prior to the preparation of the response. Insofar as Isuzu has previously provided a document to ODI (either in response to a previous Information Request or in response to a previous question in this Information Request), Isuzu may **either** produce it again, or identify the document, the document submission to ODI in which it was included and the precise location in that submission where the document is located. Previously submitted complaints and field reports do not need to be provided. When documents are produced, the documents shall be produced in an identified, organized manner that corresponds with the Information Request letter (including the subparts). When documents are produced and the documents would not, standing alone, be self-explanatory, the production of documents shall be supplemented and accompanied by explanation.

If Isuzu cannot respond to any specific request or subpart thereof, please state the reason why it is unable to do so. If Isuzu claims that any document or other information or material responsive

to any of the following items need not be provided to NHTSA because it is privileged or the work product of an attorney, separately by request number, for each document or other information or material, state the nature of that information or material and identify any document in which it is found by date, subject or title, name and position of the person from, and the person to, whom it was sent, and the name and position of any other recipient. Isuzu must also describe the basis for the claim, and explain why Isuzu believes it applies.

1. State the total number of subject vehicles sold in the United States.

2. Update your response to Requests 5 and 6 of the EAIR, by providing all information and producing copies of all documents received by Isuzu, or of which Isuzu has otherwise become aware, that have not previously been submitted to ODI relating to any of the:

   a. owner/fleet complaints,
   b. field reports,
   c. crash/incident reports,
   d. subrogation claims,
   e. lawsuits, and
   f. third-party arbitration proceedings (where Isuzu is a party to the arbitration)

   identified in and/or submitted with either your December 3, 1998 response to ODI's September 24, 1998 Information Request for PE98-051 (PEIR) or your July 30, 1999 response to the EAIR.

   Please collate your response for each category ("a" through "f") by date of the complaint, report, claim, lawsuit or proceeding. Please provide for each item in this response the incident date, mileage of the vehicle at time of incident (if known), approximate age of vehicle or model year, disposition of the complaint, claim, or other matter involved, and, where a fleet vehicle is involved, the name of the fleet, and the name and telephone number of a contact person at that fleet. For categories "a" through "d," please provide all related information and reports whether or not Isuzu has verified each one. For categories "e" and "f," summaries are acceptable. Please identify in the summary the caption, court, docket number, and filing date of each lawsuit if a copy of the complaint initiating the lawsuit is not provided.

   For all items submitted in your response to category "a," please provide a tabular summary, both in hardcopy form as a printed document and in electronic form as an Excel 2000 spreadsheet, that includes:

   a. report number, case number or other identifier of the item,
   b. identifier that references where in your response to the PEIR and/or the EAIR the related item(s) can be found,

c. date of the report/complaint,
d. name, address and telephone number(s) of the owner of the vehicle involved,
e. Vehicle Identification Number (VIN) of the vehicle involved,
f. model year of the vehicle involved,
g. model of the vehicle involved,
h. drive train configuration (2-wheel-drive or 4-wheel drive) of the vehicle involved,
i. transmission type (manual or automatic) of the vehicle involved,
j. date of manufacture of the vehicle involved,
k. date of purchase of the vehicle involved by its current owner, if available,
l. date of the reported incident, or date of the report/complaint (specify which is being provided), and
m. mileage of the vehicle involved at the time of the incident, or at the time the report/complaint was made (specify which is being provided).

For all items submitted in your response to category "b," please provide a tabular summary, both in hardcopy form as a printed document and in electronic form as an Excel 2000 spreadsheet, that includes:

a. report number, case number or other identifier of the item,
b. identifier that references where in your response to the PEIR and/or the EAIR the related item(s) can be found,
c. Vehicle Identification Number (VIN) of the vehicle involved,
d. model year of the vehicle involved,
e. model of the vehicle involved,
f. drive train configuration (2-wheel-drive or 4-wheel drive) of the vehicle involved,
g. transmission type (manual or automatic) of the vehicle involved,
h. date of manufacture of the vehicle involved, and
i. date of purchase of the vehicle involved by its current owner, if available.

3. State the number and provide copies of all of the following received by Isuzu, or of which Isuzu has otherwise become aware, that relate, or could relate to the alleged defect in the subject vehicles and that Isuzu did not submit to ODI in either its December 3, 1998 response to the PEIR or its July 30, 1999 response to the EAIR:

a. owner/fleet complaints;
b. field reports;
c. crash/incident reports;
d. subrogation claims;
e. lawsuits; and
f. third-party arbitration proceedings (where Isuzu is a party to the arbitration)

Please list and collate your response for each category ("a" through "f") by date of the complaint, report, claim, lawsuit or proceeding. Please provide for each item in this

response the incident date, mileage of vehicle at time of incident (if known), approximate age of vehicle or model year, disposition of the complaint, claim, or other matter, and, where a fleet vehicle is involved, the name of the fleet, and the name and telephone number of a contact person at that fleet. For items "a" through "d," please provide all related information and reports whether or not Isuzu has verified each one. For items "e" and "f," summaries are acceptable. Please identify in the summary the caption, court, docket number, and filing date of each lawsuit if a copy of the complaint initiating the lawsuit is not provided.

For all items submitted in your response to category "a," please provide a tabular summary that includes:

a. report number, case number or other identifier of the item,
b. identifier that references where in your response to the PEIR and/or the EAIR the related item(s) can be found,
c. date of the report/complaint,
d. name, address and telephone number(s) of the owner of the vehicle involved,
e. Vehicle Identification Number (VIN) of the vehicle involved,
f. model year of the vehicle involved,
g. model of the vehicle involved,
h. drive train configuration (2-wheel-drive or 4-wheel drive) of the vehicle involved,
i. transmission type (manual or automatic) of the vehicle involved,
j. date of manufacture of the vehicle involved,
k. date of purchase of the vehicle involved by its current owner, if available,
l. date of the reported incident, or date of the report/complaint (specify which is being provided), and
m. mileage of the vehicle involved at the time of the incident, or at the time the report/complaint was made (specify which is being provided).

For all items submitted in your response to category "b," please provide a tabular summary that includes:

a. report number, case number or other identifier of the item,
b. identifier that references where in your response to the PEIR and/or the EAIR the related item(s) can be found,
c. Vehicle Identification Number (VIN) of the vehicle involved,
d. model year of the vehicle involved,
e. model of the vehicle involved,
f. drive train configuration (2-wheel-drive or 4-wheel drive) of the vehicle involved,
g. transmission type (manual or automatic) of the vehicle involved,
h. date of manufacture of the vehicle involved, and
i. date of purchase of the vehicle involved by its current owner, if available.

4. For all items submitted in your December 3, 1998 response to Request 3(a) of the PEIR, please provide a tabular summary, both in hardcopy form as a printed document and in electronic form as an Excel 2000 spreadsheet, that includes:

   a. report number, case number or other identifier of the item,
   b. identifier that references where in your response to the PEIR the related item(s) can be found,
   c. date of the report/complaint,
   d. name, address and telephone number(s) of the owner of the vehicle involved,
   e. Vehicle Identification Number (VIN) of the vehicle involved,
   f. model year of the vehicle involved,
   g. model of the vehicle involved,
   h. drive train configuration (2-wheel-drive or 4-wheel drive) of the vehicle involved,
   i. transmission type (manual or automatic) of the vehicle involved,
   j. date of manufacture of the vehicle involved,
   k. date of purchase of the vehicle involved by its current owner, if available,
   l. date of the reported incident, or date of the report/complaint (specify which is being provided), and
   m. mileage of the vehicle involved at the time of the incident, or at the time the report/complaint was made (specify which is being provided).

   For all items submitted in your December 3, 1998 response to Request 3(b) of the PEIR, please provide a tabular summary, both in hardcopy form as a printed document and in electronic form as an Excel 2000 spreadsheet, that includes:

   a. report number, case number or other identifier of the item,
   b. identifier that references where in your response to the PEIR the related item(s) can be found,
   c. Vehicle Identification Number (VIN) of the vehicle involved,
   d. model year of the vehicle involved,
   e. model of the vehicle involved,
   f. drive train configuration (2-wheel-drive or 4-wheel drive) of the vehicle involved,
   g. transmission type (manual or automatic) of the vehicle involved,
   h. date of manufacture of the vehicle involved, and
   i. date of purchase of the vehicle involved by its current owner, if available.

5. For all items submitted in your July 30, 1999 response to Request 5(a) of the EAIR, please provide a tabular summary, both in hardcopy form as a printed document and in electronic form as an Excel 2000 spreadsheet, that includes:

   a. report number, case number or other identifier of the item,
   b. identifier that references where in your response to the EAIR the related item(s) can be found,

c. date of the report/complaint,
d. name, address and telephone number(s) of the owner of the vehicle involved,
e. Vehicle Identification Number (VIN) of the vehicle involved,
f. model year of the vehicle involved,
g. model of the vehicle involved,
h. drive train configuration (2-wheel-drive or 4-wheel drive) of the vehicle involved,
i. transmission type (manual or automatic) of the vehicle involved,
j. date of manufacture of the vehicle involved,
k. date of purchase of the vehicle involved by its current owner, if available,
l. date of the reported incident, or date of the report/complaint (specify which is being provided), and
m. mileage of the vehicle involved at the time of the incident, or at the time the report/complaint was made (specify which is being provided).

For all items submitted in your July 30, 1999 response to Request 5(b) of the EAIR, please provide a tabular summary, both in hardcopy form as a printed document and in electronic form as an Excel 2000 spreadsheet, that includes:

a. report number, case number or other identifier of the item,
b. identifier that references where in your response to the EAIR the related item(s) can be found,
c. Vehicle Identification Number (VIN) of the vehicle involved,
d. model year of the vehicle involved,
e. model of the vehicle involved,
f. drive train configuration (2-wheel-drive or 4-wheel drive) of the vehicle involved,
g. transmission type (manual or automatic) of the vehicle involved,
h. date of manufacture of the vehicle involved, and
i. date of purchase of the vehicle involved by its current owner, if available.

6. For all items submitted in your July 30, 1999 response to Request 6(a) of the EAIR, please provide a tabular summary, both in hardcopy form as a printed document and in electronic form as an Excel 2000 spreadsheet, that includes:

a. report number, case number or other identifier of the item,
b. identifier that references where in your response to the EAIR the related item(s) can be found,
c. date of the report/complaint,
d. name, address and telephone number(s) of the owner of the vehicle involved,
e. Vehicle Identification Number (VIN) of the vehicle involved,
f. model year of the vehicle involved,
g. model of the vehicle involved,
h. drive train configuration (2-wheel-drive or 4-wheel drive) of the vehicle involved,
i. transmission type (manual or automatic) of the vehicle involved,

j. date of manufacture of the vehicle involved,
k. date of purchase of the vehicle involved by its current owner, if available,
l. date of the reported incident, or date of the report/complaint (specify which is being provided), and
m. mileage of the vehicle involved at the time of the incident, or at the time the report/complaint was made (specify which is being provided).

For all items submitted in your July 30, 1999 response to Request 6(b) of the EAIR, please provide a tabular summary, both in hardcopy form as a printed document and in electronic form as an Excel 2000 spreadsheet, that includes:

a. report number, case number or other identifier of the item,
b. identifier that references where in your response to the EAIR the related item(s) can be found,
c. Vehicle Identification Number (VIN) of the vehicle involved,
d. model year of the vehicle involved,
e. model of the vehicle involved,
f. drive train configuration (2-wheel-drive or 4-wheel drive) of the vehicle involved,
g. transmission type (manual or automatic) of the vehicle involved,
h. date of manufacture of the vehicle involved, and
i. date of purchase of the vehicle involved by its current owner, if available.

7. Provide an updated response to Request 7 of the EAIR that includes copies of all service or technical bulletins, advisories, or other communications to dealers, zone offices, or field offices that relate or may relate to the alleged defect in the subject vehicles that were not provided in response to that request or were issued after Isuzu ceased collecting information used in formulating that response. If no such documents have been issued, so state.

8. Provide an updated response to Request 8 of the EAIR that includes new or additional warranty claims, including extended warranty claims, and requests for "goodwill," field, or zone adjustments received by Isuzu, or of which Isuzu has otherwise become aware, that relate or may relate to the alleged defect in the subject vehicles and that were not provided in response to that request or were received after Isuzu ceased collecting information used in formulating that response. If no such claims or requests have been received, so state.

9. Provide an updated response to Request 9 of the EAIR that includes any study, survey, investigation, test report, tabulation, analysis, and assessment that is known to Isuzu that relates or may relate to the alleged defect in the subject vehicles and that Isuzu did not submit to ODI in response to the PEIR, or that were completed after Isuzu ceased collecting information used in formulating that response. If no such study, survey, or investigation was undertaken or completed, so state.

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10. Provide an updated response to Request 10 of the EAIR that identifies and describes all modifications or changes made by or on behalf of Isuzu in the manufacture, design, or material composition of the foundation brake systems and/or anti-lock brake system used in the subject vehicles from the start of production of the subject vehicles to date, including, but not limited to, any and all changes to the ABS control unit "cap," that Isuzu did not identify in response to that request. The following information must be included for each such modification or change:
    a. the date, or approximate date on which the modification or change was incorporated into production;
    b. a description of the modification or change;
    c. the reason for the modification or change;
    d. the part number of the modified or changed component ;
    e. whether components produced before the modification or change were withdrawn from sale inventory, and if so, the date when they were withdrawn; and;
    f. whether the modified or changed components can be interchanged with earlier production components.

11. Identify and describe all tests, analyses, evaluations and investigations conducted by or on behalf of Isuzu or otherwise known to Isuzu (excluding those not already in Isuzu's possession) that were used in developing or manufacturing components of or in developing performance criteria/specifications for the antilock brake system of the subject vehicles, or of any other components or systems of the subject vehicles which could otherwise relate in any way to the alleged defect in the subject vehicles. Identify, by name and address, the entity that conducted each such test, analysis, evaluation, or investigation and state the date or dates on which it was conducted. For each such test, analysis, evaluation, or investigation, provide copies of all reports, and other documents generated during, and/or as a result of, each test, analysis, evaluation, or investigation.

12. Indicate which of the tests, analyses, evaluations and investigations identified in your response to Request 11 above were conducted after the date of the final design release of the antilock brake system on the 1998 model year subject vehicles.

13. Identify and describe all tests, analyses, evaluations and investigations conducted by or on behalf of Isuzu or otherwise known to Isuzu (excluding those not already in Isuzu's possession) that were used in developing criteria/specifications that were applied to any 1998 or later model year light-duty vehicles manufactured by Isuzu for sale in the United States for antilock brake system performance related to vehicle directional stability during braking and its relationship to vehicle deceleration capability under various road surface conditions, including but not limited to, roads with split coefficient of friction conditions (high friction road surface under the left side wheels of the vehicle and a lower friction road surface under the right side wheels of the vehicle, and vice-versa), rough roads (both

multiple and single bump conditions, and conditions of bump(s) in both wheel tracks in phase, bump(s) in both wheel tracks out of phase, or in only one wheel track), and roads with varying surface conditions (conditions where the road surface transitions from low friction to high friction, from high friction to low friction, from low friction to high friction back to low friction, and from high friction to low friction back to high friction, and where such road surface transitions occur in both wheel tracks or in only one wheel track). Identify, by name and address, the entity that conducted each such test, analysis, evaluation, or investigation and state the date or dates on which it was conducted. For each such test or analysis, provide copies of all reports and other documents generated during, and/or as a result of, each test, analysis, evaluation, or investigation.

14. Identify all suppliers of the antilock brake systems and components thereof installed on the subject vehicles, and:

    a. provide copies of all communications between Isuzu and each supplier identified above pertaining to the design, manufacture, performance, durability, quality, testing, or modification of the antilock brake systems, or components thereof, installed at any time on the subject vehicles. Include and separately identify all such communications that relate to, or resulted from, owner/fleet complaints or field reports. If any communications on this subject were oral, provide a written transcript or summary of each such communication, and include a statement that identifies the participants and the date of the communication;
    b. for each of the communications from Isuzu to a supplier submitted in response to a. above, identify and describe all tests, analyses, evaluations and investigations conducted by Isuzu that relate to that particular communication and provide copies of all reports and other documents generated during, and/or as a result of, each test, analysis, evaluation, or investigation. If no such tests, analyses, evaluations or investigations was undertaken or completed, or if no such reports or other documents concerning tests, analyses, evaluations or investigations were generated, so state.
    c. for each of the communications from a supplier to Isuzu submitted in response to a. above, identify and describe all tests, analyses, evaluations and investigations conducted by Isuzu that relate to that particular communication and provide copies of all reports and other documents generated during, and/or as a result of, each test, analysis, evaluation, or investigation. If no such tests, analyses, evaluations or investigations was undertaken or completed, or if no such reports or other documents concerning tests, analyses, evaluations or investigations were generated, so state.

15. Explain the basis for Isuzu's assertion, in its April 14, 2001 meeting with NHTSA, that in designing the antilock brake system for the subject vehicles, it chose "to sacrifice minimal stopping distance for additional directional stability." State the date or approximate date on which Isuzu made this design choice. Identify all employees and groups within Isuzu and all suppliers who recommended, considered, or approved this design choice. Provide copies of all written communications, including electronic communications, between Isuzu and its

a. all causal or contributory factors;
b. the failure mode;
c. the risk to motor vehicle safety that it poses,
d. whether there are any circumstances that would provide vehicle operators or others with warning of its existence; and
e. any possible relationship between the alleged defect and the campaign service bulletin.

This letter is being sent to Isuzu pursuant to 49U.S.C. § 30166, which authorizes NHTSA to conduct any investigation that may be necessary to enforce Chapter 301 of Title 49 and to make reports to NHTSA. Isuzu's failure to respond promptly and fully to this letter could subject Isuzu to civil penalties pursuant to 49 U.S.C. § 30165 or lead to an action for injunctive relief pursuant to 49 U.S.C. § 30163. Other remedies and sanctions are available as well.

Isuzu's response to this letter, in duplicate, must be submitted to this office by July 30, 2001. Please include in Isuzu's response the identification codes referenced on page one of this letter. If Isuzu finds that it is unable to provide all of the information requested within the time allotted, Isuzu must request an extension from Kathleen DeMeter at (202) 366-2850, no later than five business days before the response due date. If Isuzu is unable to provide all of the information requested by the original deadline, it must submit a partial response by the original deadline with whatever information Isuzu then has available, even if Isuzu has received an extension.

If Isuzu considers any portion of its response to be confidential information, 49 CFR Part 512, "Confidential Business Information," requires that Isuzu submit two copies of those document(s) containing allegedly confidential information (except only one copy of blueprints) and one copy of the documents from which information claimed to be confidential has been deleted, to the Office of Chief Counsel, National Highway Traffic Safety Administration, Room 5219 (NCC-30), 400 Seventh Street, SW, Washington, D.C. 20590. In addition, Isuzu must provide supporting information for the request for confidential treatment in accordance with section 512.4(b) and (c) and include the name, address, and telephone number of a representative to receive a response from the Chief Counsel.

If you have any technical questions concerning this matter, please call Scott Shadle of my staff at (202) 366-2583.

Sincerely,

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If you have any technical questions concerning this matter, please call Scott Shadle of my staff at (202) 366-2583.

Sincerely,

Kathleen C. DeMeter, Director
Office of Defects Investigation
Safety Assurance

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VOQ's:

538238
538961
539714
539826
540075 Duplicate of 826395
541038 Duplicate of 826395
541409 Duplicate of 826395
541580
541687
541698
541727
541748
541824
543151
543203
543208
544210
544743
544843
546015
551606
552314 Duplicate of 551606
552469
606470
607152
608751
609568
609654
700420 Duplicate of 831076
701681
701922
702136
702214
702450
702631
702723 Duplicate of 702450
702724 Duplicate of 702450
702899
702919
703147
703162
703498

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703589
704057
704169
704399
704422
704519
704895
705138
705773
705849
706828
707253 Duplicate of 838926
708428
708979
709037
709173
711427
712458 Duplicate of 702136
712767
713780
714961
715231
715826
715857
715947
715956 Duplicate of 541580
716132
717018
718235
718375
719763 Duplicate of 858955
719782 Duplicate of 858955
720276
720786
720845
720849
721927
722318
723215
723680 Duplicate of 863098
723704
724185
724510

725084
725962
726114
726171
728822
729434 Duplicate of 726171
730382
732221
732386
732400 Duplicate of 704422
732455
732543
732557
732625
732725
733137
733321
733626
733925
735103
735849
736269
737198
737416 Duplicate of 737198
737425
737965
738180
738307
738555
738819
739821
740158
741096
742184
742412
742548
742912
743156
743263
781398
784553
785216
820301

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822329
824002
825422
825685
826395
826437
826603
827702
828473
829429
831076
831733 Duplicate of 831076
832140
833444
834006
834655
834684 Duplicate of 702450
835017 Duplicate of 703162
835131 Duplicate of 703589
836207
837045
837890
838197
838578
838723
838926
843549
846157
846901
847285
847896
848773
849078
849458
849895
852522 Duplicate of 713780
854298
854917
855156
855367
855672
855701
857680

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858469
858907
858955
859313
859372
859438
859777
859837
860064
860067
860557
860558
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860577
860657
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860953
861922
862091
863098
863414
863500
864238
864291
864605
864664
865613
866789
867957
869030
871824
873760
876122
876147 Duplicate of 737198
877989
878859
879073
880872
881394
881426
882222
884660
9000435 Duplicate of 738180

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9000737

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NSA-13:SGSHADLE:
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NSA-01
NSA-10
NSA-112
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ISUZU

2001 SEP 4 PM 10:36

DET-01-153

August 31, 2001

Ms. Kathleen C. DeMeter
Office of Defects Investigation
Safety Assurance
National Highway Traffic Safety Administration
400 Seventh Street, SW
Washington, DC 20590

Subject: EA99-008 - NSA13sgs

Dear Ms. DeMeter:

On behalf of Isuzu Motors Limited, Isuzu Motors America, Inc. (collectively "Isuzu") is submitting this partial response to your letter to Mr. Yoshiyuki Ishihara (July 2, 2001). You agreed with Isuzu's proposals for the timing of this response.

As a preliminary matter, Isuzu objects to the definition of "subject vehicles" you employed for purposes of your July 2 Information Request. Specifically, we object to your inclusion of model year 2000 vehicles in the definition. In proceedings to date, your staff has repeatedly held up the model year 2000 Isuzu Rodeo as an example of outstanding braking performance. NHTSA's decision to include the MY 2000 vehicles in the definition of subject vehicles is therefore completely inconsistent with its previously expressed views in this case. Apparently, the broader definition is a mere expedient to the end of collecting similar information for the MY 2000 vehicles as the agency is collecting MY 1998-99 vehicles. Isuzu respectfully points out that this approach can be highly misleading, could inappropriately harm the reputation of the vehicles involved and simply is not necessary as a way of obtaining the information desired. For purposes of this response, therefore, Isuzu will use the term "subject vehicles" to refer only to the model year 1998-99 Isuzu Rodeo, Isuzu Amigo and Honda Passport. Although we are excluding the model year 2000 vehicles from this definition, we are still providing information on the model year 2000 vehicles in our response.

1. State the total number of subject vehicles sold in the United States.

Response 1

Attachment A provides the requested information.

2. Update your response to Requests 5 and 6 of the EAIR, by providing all information and producing copies of all documents received by Isuzu, or of which Isuzu has otherwise become aware, that have not previously been submitted to ODI relating to any of the:

   a. owner/fleet complaints,
   b. field reports,
   c. crash/incident reports,
   d. subrogation claims,
   e. e. lawsuits, and

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Isuzu Motors America, Inc.
46401 Commerce Center Drive
Plymouth, MI 48170-2473

734 455 7595
734 455 7452 FAX

We're looking to the future by recycling today.

f. third-party arbitration proceedings (where Isuzu is a party to the arbitration)

identified in and/or submitted with either your December 3, 1998 response to ODI's September 24, 1998 Information Request for PE98-051 (PEIR) or your July 30, 1999 response to the EAIR.

Please collate your response for each category ("a" through "f") by date of the complaint, report, claim, lawsuit or proceeding. Please provide for each item in this response the incident date, mileage of the vehicle at time of incident (if known), approximate age of vehicle or model year, disposition of the complaint, claim, or other matter involved, and, where a fleet vehicle is involved, the name of the fleet, and the name and telephone number of a contact person at that fleet. For categories "a" through "d," please provide all related information and reports whether or not Isuzu has verified each one. For categories "e" and "f," summaries are acceptable. Please identify in the summary the caption, court, docket number, and filing date of each lawsuit if a copy of the complaint initiating the lawsuit is not provided.

For all items submitted in your response to category "a," please provide a tabular summary, both in hardcopy form as a printed document and in electronic form as an Excel 2000 spreadsheet, that includes:

a. report number, case number or other identifier of the item,
b. identifier that references where in your response to the PEIR and/or the EAIR the related item(s) can be found,
c. date of the report/complaint,
d. name, address and telephone number(s) of the owner of the vehicle involved,
e. Vehicle Identification Number (VIN) of the vehicle involved,
f. model year of the vehicle involved,
g. model of the vehicle involved,
h. drive train configuration (2-wheel-drive or 4-wheel drive) of the vehicle involved,
i. transmission type (manual or automatic) of the vehicle involved,
j. date of manufacture of the vehicle involved,
k. date of purchase of the vehicle involved by its current owner, if available,
l. date of the reported incident, or date of the report/complaint (specify which is being provided)
m. mileage of the vehicle involved at the time of the incident, or at the time the report/complaint was made (specify which is being provided).

For all items submitted in your response to category "b," please provide a tabular summary that includes:

a. report number, case number or other identifier of the item,
b. identifier that references where in your response to the PEIR and/or the EAIR the related item(s) can be found,
c. Vehicle Identification Number (VIN) of the vehicle involved,
d. model year of the vehicle involved,
e. model of the vehicle involved,
f. drive train configuration (2-wheel-drive or 4-wheel drive) of the vehicle involved,
g. transmission type (manual or automatic) of the vehicle involved,
h. date of manufacture of the vehicle involved, and
i. date of purchase of the vehicle involved by its current owner, if available.

Response 2

Attachment B contains hard copies of all materials relating to claims, field reports and incidents not previously submitted to the agency. This includes both (1) new documents relating to materials previously submitted, as called for by IR question 2; and (2) new claims, reports and incidents, as called for by IR question 3. The documents are collated by date within each category ("a" through "c"). Included are materials received by Isuzu or Honda by June 30, 2001. Isuzu has also collected materials relating to subrogation claims, lawsuits and third-party arbitrations (categories "d" through "f"). These materials are being reviewed by counsel. Isuzu will provide these materials or summaries to NHTSA as soon as possible.

Attachment C is a disk containing all the spreadsheets requested in IR question 2 through 6.

Attachment D is a hard copy of the spreadsheet relating to category "a" documents. (In this case and others, the name of the hard-copy attachment is used as the name of corresponding Excel file on the disk.)

Attachment E is a hard copy of the spreadsheet relating to category "b" documents.

3. State the number and provide copies of all of the following received by Isuzu, or of which Isuzu has otherwise become aware, that relate, or could relate to the alleged defect in the subject vehicles and that Isuzu did not submit to ODI in either its December 3,1998 response to the PEIR or its July 30,1999 response to the EAIR:

   a. owner/fleet complaints;
   b. field reports;
   c. crash/incident reports;
   d. subrogation claims;
   e. lawsuits; and
   f. third-party arbitration proceedings (where Isuzu is a party to the arbitration)

   Please list and collate your response for each category ("a" through "f) by date of the complaint, report, claim, lawsuit or proceeding. Please provide for each item in this response the incident date, mileage of vehicle at time of incident (if known), approximate age of vehicle or model year, disposition of the complaint, claim, or other matter, and, where a fleet vehicle is involved, (the name of the fleet, and the name and telephone number of a contact person at that fleet. For items "a" through "d," please provide all related information and reports whether or not Isuzu has verified each one. For items "e" and "f," summaries are acceptable. Please identify in the summary the caption, court, docket number, and filing date of each lawsuit if a copy of the complaint initiating the lawsuit is not provided.

   For all items submitted in your response to category "a," please provide a tabular summary that includes;

   a. report number, case number or other identifier of the item,
   b. identifier that references where in your response to the PEIR and/or the EAIR the related item(s) can be found,
   c. date of the report/complaint,
   d. name, address and telephone number(s) of the owner of the vehicle involved,
   e. Vehicle Identification Number (VIN) of the vehicle involved,
   f. model year of the vehicle involved,
   g. model of the vehicle involved,
   h. drive train configuration (2-wheel-drive or 4-wheel drive) of the vehicle involved,
   i. transmission type (manual or automatic) of the vehicle involved,
   j. date of manufacture of the vehicle involved,
   k. date of purchase of the vehicle involved by its current owner, if available,
   l. date of the reported incident, or date of the report/complaint (specify which is being provided), and
   m. mileage of the vehicle involved at the time of the incident, or at the time the report/complaint was made (specify which is being provided).

   For all items submitted in your response to category "b," please provide a tabular summary, both in hardcopy form as a printed document and in electronic form as an Excel 2000 spreadsheet, that includes:

   a. report number, case number or other identifier of the item,
   b. identifier that references where in your response to the PEIR and/or the EAIR the related item(s) can be found,
   c. Vehicle Identification Number (VIN) of the vehicle involved,
   d. model year of the vehicle involved,
   e. model of the vehicle involved,
   f. drive train configuration (2-wheel-drive or 4-wheel drive) of the vehicle involved,

g. transmission type (manual or automatic) of the vehicle involved,
h. date of manufacture of the vehicle involved, and
i. date of purchase of the vehicle involved by its current owner, if available.
j. date of the reported incident, or date of the report/complaint (specify which is being provided), and
k. mileage of the vehicle involved at the time of the incident, or at the time the report/complaint was made (specify which is being provided).

Response 3

Attachment B contains the responsive documents in categories "a" through "c." The electronic spreadsheets are in Attachment C. (For more explanation, see the response to question 2 above.) Attachment F contains a hard copy of the spreadsheet relating to category "a" materials. Attachment G contains a hard copy of the spreadsheet relating to category "b" materials.

4. For all items submitted in your December 3, 1998 response to Request 3(a) of the PEIR, please provide a tabular summary, both in hardcopy form as a printed document and in electronic form as an Excel 2000 spreadsheet, that includes:

   a. report number, case number or other identifier of the item,
   b. identifier that references where in your response to the PEIR the related item(s) can be found,
   c. date of the report/complaint,
   d. name, address and telephone number(s) of the owner of the vehicle involved,
   e. Vehicle Identification Number (VIN) of the vehicle involved,
   f. model year of the vehicle involved,
   g. model of the vehicle involved,
   h. drive train configuration (2-wheel-drive or 4-wheel drive) of the vehicle involved,
   i. transmission type (manual or automatic) of the vehicle involved,
   j. date of manufacture of the vehicle involved,
   k. date of purchase of the vehicle involved by its current owner, if available,
   l. date of the reported incident, or date of the report/complaint (specify which is being provided), and
   m. mileage of the vehicle involved at the time of the incident, or at the time the report/complaint was made (specify which is being provided).

   For all items submitted in your December 3, 1998 response to Request 3(b) of the PEIR, please provide a tabular summary, both in hardcopy form as a printed document and in electronic form as an Excel 2000 spreadsheet, that includes:

   a. report number, case number or other identifier of the item,
   b. identifier that references where in your response to the PEIR the related item(s) can be found,
   c. Vehicle Identification Number (VIN) of the vehicle involved,
   d. model year of the vehicle involved,
   e. model of the vehicle involved,
   f. drive train configuration (2-wheel-drive or 4-wheel drive) of the vehicle involved,
   g. transmission type (manual or automatic) of the vehicle involved,
   h. date of manufacture of the vehicle involved, and
   i. date of purchase of the vehicle involved by its current owner, if available.

Response 4

The requested spreadsheets are contained in Attachment C. Attachment H contains a printout of the spreadsheet relating to category "a" materials responsive to this question and to questions 5 and 6 of this IR. Attachment I contains a printout of the spreadsheet relating to category "b" materials responsive to this question and to questions 5 and 6 of this IR.

5. For all items submitted in your July 30, 1999 response to Request 5(a) of the EAIR, please provide a tabular summary, both in hardcopy form as a printed document and in electronic form as an Excel 2000 spreadsheet, that includes:

   a. report number, case number or other identifier of the item,
   b. identifier that references where in your response to the EAIR the related item(s) can be found,
   c. date of the report/complaint,
   d. name, address and telephone number(s) of the owner of the vehicle involved,
   e. Vehicle Identification Number (VIN) of the vehicle involved,
   f. model year of the vehicle involved,
   g. model of the vehicle involved,
   h. drive train configuration (2-wheel-drive or 4-wheel drive) of the vehicle involved,
   i. transmission type (manual or automatic) of the vehicle involved,
   j. date of manufacture of the vehicle involved,
   k. date of purchase of the vehicle involved by its current owner, if available,
   l. date of the reported incident, or date of the report/complaint (specify which is being provided), and
   m. mileage of the vehicle involved at the time of the incident, or at the time the report/complaint was made (specify which is being provided)

   For all items submitted in your July 30, 1999 response to Request 5(b) of the EAIR, please provide a tabular summary, both in hardcopy form as a printed document and in electronic form as an Excel 2000 spreadsheet, that includes:

   a. report number, case number or other identifier of the item,
   b. identifier that references where in your response to the EAIR the related item(s) can be found,
   c. Vehicle Identification Number (VIN) of the vehicle involved,
   d. model year of the vehicle involved,
   e. model of the vehicle involved,
   f. drive train configuration (2-wheel-drive or 4-wheel drive) of the vehicle involved,
   g. transmission type (manual or automatic) of the vehicle involved,
   h. date of manufacture of the vehicle involved, and
   i. date of purchase of the vehicle involved by its current owner, if available.

Response 5

See response to question 4 above.

6. For all items submitted in your July 30, 1999 response to Request 6(a) of the EAIR, please provide a tabular summary, both in hardcopy form as a printed document and in electronic form as an Excel 2000 spreadsheet, that includes;

   a. report number, case number or other identifier of the item,
   b. identifier that references where in your response to the EAIR the related item(s) can be found,
   c. date of the report/complaint,
   d. name, address and telephone number(s) of the owner of the vehicle involved,
   e. Vehicle Identification Number (VIN) of the vehicle involved,
   f. model year of the vehicle involved,
   g. model of the vehicle involved,
   h. drive train configuration (2-wheel-drive or 4-wheel drive) of the vehicle involved,
   i. transmission type (manual or automatic) of the vehicle involved,
   j. date of manufacture of the vehicle involved,
   k. date of purchase of the vehicle involved by its current owner, if available,
   l. date of the reported incident, or date of the report/complaint (specify which is being provided), and
   m. mileage of the vehicle involved at the time of the incident, or at the time the report/complaint was made (specify which is being provided).

   For all items submitted in your July 30, 1999 response to Request 6(b) of the EAIR, please provide a tabular summary, both in hardcopy form as a printed document and in electronic form as an Excel 2000 spreadsheet, that includes:

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a. report number, case number or other identifier of the item,
b. identifier that references where in your response to the EAIR the related item(s) can be found,
c. Vehicle Identification Number (VIN) of the vehicle involved,
d. model year of the vehicle involved,
e. model of the vehicle involved,
f. drive train configuration (2-wheel-drive or 4-wheel drive) of the vehicle involved,
g. transmission type (manual or automatic) of the vehicle involved,
h. date of manufacture of the vehicle involved, and
i. date of purchase of the vehicle involved by its current owner, if available.

Response 6

See response to question 4 above.

7. Provide an updated response to Request 7 of the EAIR that includes copies of all service or technical bulletins, advisories, or other communications to dealers, zone offices, or field offices that relate or may relate to the alleged defect in the subject vehicles that were not provided in response to that request or were issued after Isuzu ceased collecting information used in formulating that response. If no such documents have been issued, so state.

Response 7

No such documents have been issued since Isuzu's submission of July 30, 1999.

8. Provide an updated response to Request 8 of the EAIR that includes new or additional warranty claims, including extended warranty claims, and requests for "goodwill," field, or zone adjustments received by Isuzu, or of which Isuzu has otherwise become aware, that relate or may relate to the alleged defect in the subject vehicles and that were not provided in response to that request or were received after Isuzu ceased collecting information used in formulating that response. If no such claims or requests have been received, so state.

Response 8

Attachment J contains warranty data for Isuzu vehicles from May 1999 through June 2001. Attachment K provides corresponding information for Honda vehicles.

9. Provide an updated response to Request 9 of the EAIR that includes any study, survey, investigation, test report, tabulation, analysis, and assessment that is known to Isuzu that relates or may relate to the alleged defect in the subject vehicles and that Isuzu did not submit to ODI in response to the PEIR, or that were completed after Isuzu ceased collecting information used in formulating that response. If no such study, survey, or investigation was undertaken or completed, so state.

Response 9

Attachment L contains a partial list of responsive studies and analyses. Copies of these studies are being sent to the United States from Japan and will be provided to NHTSA as soon as possible. Other responsive test data, studies and analyses have already been provided to NHTSA in prior submissions or elsewhere in this submission. Isuzu has also discussed other test data in several meetings with NHTSA and in this submission (for example in the response to question 16 below). Isuzu has some additional test data and analyses that are not listed in Attachment L and are not being provided because they have not been translated or are subject to a claim of work product or other privilege. Isuzu has requested a meeting in which to present additional data and analyses, and it hereby renews that request.

10. Provide an updated response to Request 10 of the EAIR that identifies and describes all modifications or changes made by or on behalf of Isuzu in the manufacture, design, or material composition of the foundation brake systems and/or anti-lock brake system used in the subject vehicles from the start of production of the subject vehicles to date, including, but not limited to, any and all changes to the ABS control unit "cap," that Isuzu did not identify in response to that request. The following information must be included for each such modification or change:

    a. the date, or approximate date on which the modification or change was incorporated into production;
    b. a description of the modification or change;
    c. the reason for the modification or change;
    d. the part number of the modified or changed component;
    e. whether components produced before the modification or change were withdrawn from sale inventory, and if so, the date when they were withdrawn; and;
    f. whether the modified or changed components can be interchanged with earlier production components.

Response 10

Isuzu has previously submitted the requested information. *See* Letter from H. Kuga to Scott Shadle (April 4, 2001)(DET-01-057).

11. Identify and describe all tests, analyses, evaluations and investigations conducted by or on behalf of Isuzu or otherwise known to Isuzu (excluding those not already in Isuzu's possession) that were used in developing or manufacturing components of or in developing performance criteria/specifications for the antilock brake system of the subject vehicles, or of any other components or systems of the subject vehicles which could otherwise relate in any way to the alleged defect in the subject vehicles. Identify, by name and address, the entity that conducted each such test, analysis, evaluation, or investigation and state the date or dates on which it was conducted. For each such test, analysis, evaluation, or investigation, provide copies of all reports, and other documents generated during, and/or as a result of, each test, analysis, evaluation, or investigation.

Response 11

Attachment M contains a list of approximately 76 tests, analyses and investigations that are responsive to questions 11, 12 and/or 13. Copies of these studies are being sent to the United States from Japan and will be provided to NHTSA as soon as possible. For convenient reference, Attachment N contains a list of Isuzu model names and codes. Other documents relating to ABS specifications are being provided in conjunction with the response to question 14 below.

12. Indicate which of the tests, analyses, evaluations and investigations identified in your response to Request 11 above were conducted after the date of the final design release of the antilock brake system on the 1998 model year subject vehicles.

Response 12

See Response to Question 11 and Attachment M.

13. Identify and describe all tests, analyses, evaluations and investigations conducted by or on behalf of Isuzu or otherwise known to Isuzu (excluding those not already in Isuzu's possession) that were used in developing criteria/specifications that were applied to any 1998 or later model year light-duty vehicles manufactured by Isuzu for sale in the United States for antilock brake system performance related to vehicle directional stability during braking and its relationship to vehicle deceleration capability under various road surface conditions, including but not limited to, roads with split coefficient of friction conditions (high friction road surface under the left side wheels of the vehicle and a lower friction road surface under the right side wheels of the vehicle, and vice-versa), rough roads

(both multiple and single bump conditions, and conditions of bump(s) in both wheel tracks in phase, bump(s) in both wheel tracks out of phase, or in only one wheel track), and roads with varying surface conditions (conditions where the road surface transitions from low friction to high friction, from high friction to low friction, from low friction to high friction back to low friction, and from high friction to low friction back to high friction, and where such road surface transitions occur in both wheel tracks or in only one wheel track). Identify, by name and address, the entity that conducted each such test, analysis, evaluation, or investigation and state the date or dates on which it was conducted. For each such test or analysis, provide copies of all reports and other documents generated during, and/or as a result of, each test, analysis, evaluation, or investigation.

Response 13

See Response to Question 11 and Attachment M.

14. Identify all suppliers of the antilock brake systems and components thereof installed on the subject vehicles, and;

    a. provide copies of all communications between Isuzu and each supplier identified above pertaining to the design, manufacture, performance, durability, quality, testing, or modification of the antilock brake systems, or components thereof installed at any time on the subject vehicles. Include and separately identify all such communications that relate to, or resulted from, owner/fleet complaints or field reports. If any communications on this subject were oral, provide a written transcript or summary of each such communication, and include a statement that identifies the participants and the date of the communication;
    b. for each of the communications from Isuzu to a supplier submitted in response to a, above, identify and describe all tests, analyses, evaluations and investigations conducted by Isuzu that relate to that particular communication and provide copies of all reports and other documents generated during, and/or as a result of, each test, analysis, evaluation, or investigation. If no such tests, analyses, evaluations or investigations was undertaken or completed, or if no such reports or other documents concerning tests, analyses, evaluations or investigations were generated, so state.
    c. for each of the communications from a supplier to Isuzu submitted in response to a. above, identify and describe all tests, analyses, evaluations and investigations conducted by Isuzu that relate to that particular communication and provide copies of all reports and other documents generated during, and/or as a result of, each test, analysis, evaluation, or investigation. If no such tests, analyses, evaluations or investigations was undertaken or completed, or if no such reports or other documents concerning tests, analyses, evaluations or investigations were generated, so state.

Response 14

Attachment O lists the ABS and brake component suppliers for the subject vehicles. Attachment P contains a list and copies of communications between Isuzu and the ABS supplier, plus other related documents.

The 1998 MY foundation brakes were carried over from prior years. We no longer have copies of communications with the supplier.

Isuzu Motors Limited revised the design of the foundation brakes for model year 2000. Attachment Q provides additional information on this change. *See also* DET-01-057 (April 4, 2001). Since Isuzu Motors Limited developed the design internally, there is no correspondence discussing the design with the supplier.

The front suspension specifications were decided within Isuzu Motors Limited. There are no documents between Isuzu and any supplier.

15. Explain the basis for Isuzu's assertion, in its April 14, 2001 meeting with NHTSA, that in designing the antilock brake system for the subject vehicles, it chose "to sacrifice minimal stopping distance for

additional directional stability." State the date or approximate date on which Isuzu made this design choice. Identify all employees and groups within Isuzu and all suppliers who recommended, considered, or approved this design choice. Provide copies of all written communications, including electronic communications, between Isuzu and its antilock brake system suppliers in which this design choice is reflected. Describe all oral communications between Isuzu and its antilock brake system suppliers in which this design choice was discussed, stating, for each such communication, its date or approximate date, the names and positions of all participants, and the substance of the matters discussed. Provide copies of all studies, surveys, investigations, reports, or other documents relating to this design choice.

Response 15

Isuzu denies that its representatives used the words placed in quotation marks and attributed to it. Nor is Isuzu aware of any meeting with NHTSA on April 14, 2001.

Isuzu did meet with NHTSA on April 17, 2001. At that meeting, Isuzu did address the tradeoff between stopping distance and stability. In particular, Isuzu pointed out that brake design (and ABS systems) inherently involve a tradeoff between best possible stopping distance and stability/controllability. Simply put, "the stability of motor vehicles is compromised when the rear wheels lock up." Shadle, et al., *Vehicle Braking, Stability and Control*, SAE 830562 (March 1983). For that reason, the agency has a long record of opposition to "premature rear-wheel lockup," explicitly advocating front-biased designs despite the fact that a "car gripped in the throes of front-wheel lock-up will require longer to stop than a car in rear-wheel lock-up . . ." *United States v. General Motors*, 841 F.2d 278, 283 (D.C. Cir. 1988).

Isuzu has demonstrated that while the subject vehicles sometimes have longer stopping distance and more variability in stopping distance than some peer vehicles on some types of test tracks, the subject vehicles also exhibit greater stability and controllability than these same peer vehicles. *See* Letter from John Gibson Mullan to John Womack (April 26, 2001)(DET-01-081), Enclosure 1 pp. 025 through 032, and Response to Question 16 below.

This performance was in fact the result of an evolving design choice. In the early stages of design planning for the model year 1998 Rodeo, Isuzu Motors Limited considered allowing up to 30 degrees of yaw per second in stops from 50 kph (30 mph) on a specified split-coefficient surface. *See* Attachment P, tab 1, enclosure p. 2. Since related vehicles were to be sold in Europe, these preliminary specifications were reviewed by Opel's Technical Development Center Europe ("TDC"). After discussion with Kelsey Hayes, TDC requested that the yaw specification be tightened for purposes of the European variant. *See* Attachment P, tab 1, p.1. Specifically, TDC asked Isuzu to permit only 7 degrees of yaw per second with no steering correction during the first 0.8 seconds of a stop on a deeper left/right mu difference and at speeds up to 100 kph (62 mph). Upon consideration, Isuzu Motors Limited decided to adopt this specification for the European vehicles and also for the U.S. counterpart. *See* Attachment P, tab 3 (Attachment 4).

When Isuzu Motors Limited designed new ABS criteria for the model year 2000 Rodeo, it relaxed the yaw criterion. The newer design allows up to fifteen degrees of yaw per second. *See* Attachment P, tab 29.

Attachment R shows the results of fixed steer tests for various vehicles with a green shaded area reflecting the 1994 yaw-rate limits and blue lines marking the wider yaw-rate limits applicable to the model year 2000 design. As this chart demonstrates, the maximum yaw rates observed in Isuzu's testing for the model year 1998 Rodeo meet the 1994 criteria. Other

vehicles, particularly those exhibiting less variability in stopping distance, display much larger yaw rates in this test.

16. If Isuzu's assessment of the alleged defect in the subject vehicles has changed since Isuzu submitted its December 3,1998 response to the PEIR or its July 30,1999 response to the EAIR, provide Isuzu's most recent assessment of me alleged defect, including:

    a. all causal or contributory factors;
    b. the failure mode;
    c. the risk to motor vehicle safety that it poses,
    d. whether there are any circumstances that would provide vehicle operators or others with warning of its existence; and
    e. any possible relationship between the alleged defect and the campaign service bulletin.

Response 16

Isuzu firmly believes that the braking performance of the subject vehicles is safe. Our more recent work only strengthens our conviction on this point. As a brief summary of the reasons for this conclusion, Isuzu offers the following:

1. Neither Isuzu nor NHTSA has identified any defect affecting operation of the ABS or foundation braking system. The subject vehicles appear to be functioning as designed in all respects. In the absence of a defect, no basis for safety recall exists.

2. The subject vehicles comply with all provisions of FMVSS 105, including those applicable to ABS operation. By law, this standard must meet the need for motor vehicle safety in braking performance. Compliance with this standard is therefore conclusive as to the safe braking performance of the subject vehicles. If the agency wishes to impose new or different performance requirements, it must do so prospectively through rulemaking, not retroactively through defect investigations.

3. In the absence of a malfunction, NHTSA has closed prior brake investigations based on the fact of compliance with FMVSS 105. *See, e.g.*, Rear Brake Effectiveness, PE 86-005 Preliminary Evaluation Resume at 1 (Jan. 16, 1986). In response to a later petition concerning the brake performance of these same models, NHTSA explained that PE 86-005 "was closed because our own safety compliance testing showed that these vehicles were performing within the stopping distance requirements of Federal Motor Vehicle Safety Standard No. 105 (Hydraulic Brake systems) and because we could find no evidence of a brake system malfunction." Letter from George L. Parker, NHTSA Associate Administrator, to James Lissner, petitioner, at 1-2 (Nov. 19, 1986).

4. According to agency documents, NHTSA opened this investigation because of the number of complaints it had received regarding braking performance of the subject vehicles. Over time, however, the rate of such complaints has decreased substantially, marking the absence of a defect trend.

5. The decline in rates suggests that the early complaints were not the result of the ABS design. Instead, they may have resulted from a potpourri of different start-up problems. Some MY 1998 vehicles had an ABS system malfunction which caused the ABS indicator light to come on inappropriately. This led to an early campaign (SB98-09-L002/L007) and may have caused many owners to be extra-sensitive to ABS performance.

6. NHTSA's test program last year (2000) focused on stopping performance on split-mu surfaces. NHTSA reported that the subject vehicles had greater variability in stopping distance than certain peer vehicles in panic stops from 40 mph on split-mu surfaces. Of course, greater variability does not automatically brand a model as defective. The issue is whether the performance is so inferior as to be unreasonable. In the case of the subject vehicles, the performance was far from unreasonable. Indeed, even in NHTSA testing on split-mu surfaces, the subject vehicles still met the stopping distance and variability requirements applicable to unused vehicles stopping on uniform, high-coefficient surfaces under FMVSS 105.

7. In addition, while NHTSA's ad hoc test program featured peer vehicles that exhibited better stopping distance performance than the subject vehicles, another very recent NHTSA test program involved nine test vehicles, all of which had longer average stopping distance than the subject vehicles on split-mu surfaces. *See* DET-01-081, Enclosure 1 pp. 017-018.

8. NHTSA has often recognized that braking systems and ABS systems in particular involve trade-offs between stopping distance and stability. For that reason, NHTSA has acknowledged that "Stopping distance and directional stability must be evaluated together when discussing ABS performance." DOT HS 808 875, p. 23 (Jan. 1999).

9. Notwithstanding this position, NHTSA's 2000 test program completely ignored directional stability of the subject vehicles and peers. Isuzu testing demonstrated that in panic stops on split-mu the subject vehicles exhibit superior stability relative to the few peer vehicles shown to have less variability in stopping distance. As demonstrated in the response to question 15 above, this strength of the Isuzu design is no post-hoc rationalization: it was quite intentionally engineered into the ABS system.

10. Isuzu also demonstrated that the subject vehicles exhibit greater controllability while braking in a turn on split-mu surfaces. The peer vehicles exhibited a degree of oversteer that made them more difficult to control and more likely to trip and roll over.

11. NHTSA's findings about the performance of the subject vehicles on split-mu surfaces appear to be unrelated to the complaints that led to initiation of the investigation. We understand that NHTSA did an elaborate analysis of the subject-vehicle complaints indicating that a large percentage of them mentioned bumps. Isuzu has never been shown this analysis. Apparently it was this key analysis that caused NHTSA to begin investigating the performance of the subject vehicles on bumps, employing a test course featuring a one-inch drop off. Thereafter, however, NHTSA decided to use a split-mu surface for most of its testing. Apparently, NHTSA concluded that the results of its split-mu testing were representative of the performance of the subject vehicles on bumps.

12. Isuzu found no basis for NHTSA's conclusion that a large percentage of the subject vehicle complaints mention bumps. In any case, "the Government must demonstrate that failures ha[ve] occurred, not merely that consumers ha[ve] complained." *United States v. General Motors,* 841 F.2d at 411 (internal quotation omitted). In this case, NHTSA has never suggested that the subject vehicles have an elevated collision rate as a result of their ABS system. Isuzu believes that the complaints reporting subject-vehicle accidents mention bumps even less often than the complaints do generally. Isuzu also has demonstrated that the ABS system of the subject vehicles is not designed to respond to bumps the same way as it responds to split mu.

13. Nevertheless, Isuzu has conducted some additional testing on various bumpy surfaces. In panic stops crossing a one-inch drop (akin to NHTSA's original test course), Isuzu found that the average stopping distance of the subject vehicles was better than required by FMVSS 105 for stops on a uniform, high-coefficient surface with no drop. These tests also confirm that the braking performance of the subject vehicles on bumps is different from their performance on split mu.

14. Isuzu's testing also confirmed that the braking performance of the subject vehicles on bumpy surfaces is different from their behavior on split-mu surfaces. Bumps may appear to invoke split-coefficient type ABS behavior if their effect on the vehicle is sufficiently asymmetric and the wheel speed changes are within the range expected from split mu brake applications. There are, however, fundamental differences in the system's intended response to the traction loss expected in split mu relative to the cyclic variation in available traction resulting from a bumpy road.

15. Isuzu sees no basis for concluding that a one-inch drop is generally representative of bumps as they are described in the subject-vehicle complaints. Accordingly, Isuzu conducted testing on other types of courses involving bumps. Isuzu found that several peer vehicles exhibited stopping distance and variability similar to that of the subject vehicles in one or another of these conditions. Attachment S shows results for several of these tests. Significant variation in average stopping distance can result from different vehicles, different tires and tire conditions and different road conditions. For example, the disparity in results for the last two sets of Rodeo results on the chart disappeared after the tires on the test vehicle were changed. As the chart illustrates, however, significant stop-to-stop variability occurs with different vehicles on different road surfaces.

16. In attempting to identify an ABS malfunction in the subject vehicles, NHTSA selected pressure traces showing differences in the brake pressure recovery after the initial ABS activations on split mu and one-inch drop tests. Isuzu tests show that peer vehicles exhibit as much or more stop-to-stop variability in recorded pressures on a variety of test surfaces. Attachment T shows the brake-pressure profile for the shortest (red) and longest (blue) stops for a series of tests of each vehicle on a given surface. The peer vehicles shown use very different ABS hardware and software developed by different suppliers than Isuzu's. The variability in stop-to-stop response is not a malfunction, but results from small differences in the interaction between the vehicle and the test course. That variability is inherent in digital systems that are deliberately sensitive to braking conditions that might lead to vehicle instability.

17. Isuzu also conducted tests involving cornering on bumpy surfaces. As expected, Isuzu found that the subject vehicles exhibit superior stability and controllability on these surfaces relative to other vehicles having less variability in stopping distance. This result is consistent with the prior test results showing better stability for the subject vehicles and with the design decisions made before production. Attachment U.

In sum, Isuzu believes that the subject vehicles have no defect and that their braking performance compares favorably to that of other vehicles on the road. There is no basis for a safety-related recall.

* * * *

The July 2 Information Request to which this letter responds sets forth definitions of "Isuzu" and "Document," each of which is objected to on grounds that it is overbroad, unreasonable and vague. This response is based on reasonable searches conducted and/or requested by Isuzu Motors Limited and/or Isuzu Motors America of locations within such organizations and within AIMI and American Honda where documents and information responsive to your requests would ordinarily be found. Isuzu intends to seek confidential treatment for portions of this response in the near future. In the meantime, we request that the entire response be held by ODI as confidential.

If you have any question about this, please feel free to contact me at 734-455-7557 ext. 266 or Mr. Ishihara of my staff at extension 264.

Sincerely yours,

Hironobu Kuga JGM

Hironobu Kuga
Chief Representative
Emissions & Safety
Isuzu Motors America, Inc.

Enclosures

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ISUZU

DET-01-169

September 18, 2001

Ms. Kathleen C. DeMeter
Office of Defects Investigation
Safety Assurance
National Highway Traffic Safety Administration
400 Seventh Street, SW
Washington, DC 20590

Subject: EA99-008 - NSA13sgs

Dear Ms. DeMeter:

As requested by Mr. Shadle of your staff, Isuzu is providing two additional copies of certain materials filed with DET-01-153. These include duplicates of Attachments A through I, N and O. Isuzu has decided not to seek confidential treatment of these materials.

If you have any question about this, please feel free to contact me at 734-455-7557 ext. 266 or Mr. Ishihara of my staff at extension 264.

Hironobu Kuga (JGM)

Hironobu Kuga
Chief Representative
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