

HONDA

American Honda Motor Co., Inc.
1919 Torrance Boulevard
Torrance, CA 90501-2746
Phone (310) 783-2000

March 18, 2008

Mr. George Person
Chief, Recall Management Division
Office of Defects Investigation
NATIONAL HIGHWAY TRAFFIC SAFETY
ADMINISTRATION
1200 New Jersey Avenue, SE
Washington, DC 20590

Dear Mr. Person:

On February 25, 2008, American Honda Motor Co., Inc. (AHM) received an acknowledgement letter for our recall on aftermarket hitch style bike racks (NHTSA campaign id. 08E-013). We would like to take this opportunity to explain why our defect report satisfied all the requirements of 49 CFR 573.6 except for the following items:

NHTSA Requirement:

In accordance with 49 U.S.C. § 30119 (d)(2), notification shall be sent by first class mail to the most recent purchaser known to the manufacturer. In addition, if the Secretary decides that public notice is required for motor vehicle safety, public notice shall be given in the way required by the Secretary after consulting with the manufacturer. If sufficient owner data is not available for mailed notification, other means of notifying owners of this recalled equipment must be utilized.

Honda Response:

With respect to the recall of Thule bike racks, AHM has found that warranty registration information was not obtained from the 2,032 bike rack purchasers out of the approximately 1,225,000 customers of 2003-2007 and some 2008 model year Honda Pilot, Ridgeline and Acura MDX vehicles. Since sufficient owner data is not available for mailed notification, AHM has contacted the selling dealers and instructed them to contact customers who purchased accessory bike racks from their dealership and we have posted information about this recall online to registered customers of one of these vehicles in Honda's online communication tool; "Ownerlink.com." Through these two communication channels Honda has instructed customers to contact Thule directly to obtain a retrofit kit to remedy this concern.

NHTSA Requirement:

Please submit a remedy plan to the Recall Management Division (RMD) which includes the methods Honda will use to notify owners. This must include a timeline in which Honda estimates this will be completed and Honda's expectation of the effectiveness of the communication method. Please note that dealer technical service bulletins are not alone sufficient for notifying purchasers of recalled equipment.

Honda Response:

AHM has attempted to instruct customers through the means described above to contact the manufacturer of these bike racks for a free retrofit kit, which can be easily installed without the use of any tools. AHM is supporting the remedy plan enacted by Thule, the manufacturer of the bike racks and distributor of the retrofit kits.

NHTSA Requirement:

Copies of all notices, bulletins, dealer notifications, and other communications that relate to this recall, including a copy of the final owner notification letter and any subsequent owner follow-up notification letter(s), are required to be submitted to this office no later than 5 days after they are originally sent (if they are sent to more than one manufacturer, distributor, dealer, or purchaser/owner).

Honda Response:

In our initial defect reporting letter dated January 30, 2008, Honda attached copies of the dealer message sent on August 14, 2007. As stated above, sufficient owner data is not available for mailed notification, Honda has instructed the selling dealers to contact customers who purchased accessory bike racks from their dealership and Honda has posted information about this recall online to registered customers of one of these vehicles in Honda's online communication tool; "Ownerlink.com."

NHTSA Requirement:

As stated in Part 573.7, submission of the first of six consecutive quarterly status reports is required within one month after the close of the calendar quarter in which notification to purchasers occurs. Therefore, the first quarterly report will be due on or before 30 days after close of the calendar quarter.

Honda Response:

Honda does not possess sufficient owner data information to notify purchasers, therefore will be unable to submit quarterly status reports.

Please contact me at (310)783-3277 if you have any further questions.

Sincerely,

AMERICAN HONDA MOTOR CO., INC.



William R. Willen
Managing Counsel
Product Regulatory Office

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