

February 18, 2013

Mr. Frank S. Borris II  
Vehicle Control Division  
Office of Defects Investigation  
U.S. DEPARTMENT OF TRANSPORTATION  
National Highway Traffic Safety Administration  
1200 New Jersey Avenue, SE  
Washington, DC 20590

**Re: EA12-005  
1994-2002 Honda Passport  
Fuel Storage Fire Hazards**

Dear Mr. Borris:

In reply to your letter dated December 20, 2012, we are submitting our response regarding the allegations of crash related fire hazards associated with the fuel storage systems on model year (MY) 1994-2002 Honda Passport vehicles.

1. **State, by model, engine and model year, the number of subject and peer vehicles Honda has manufactured for sale or lease in the United States. Separately, for each subject vehicle manufactured to date by Honda, state the following:**
  - a) **Vehicle identification number (VIN);**
  - b) **Model;**
  - c) **Model Year;**
  - d) **Date of Manufacture (in "dd/mm/yyyy" date format);**
  - e) **Date warranty coverage commenced (in "dd/mm/yyyy" date format);**
  - f) **The State in the United States where the vehicle was originally sold or leased (or delivered for sale or lease); and**
  - g) **The stowed location (e.g., in the rear cargo are, below the cargo area floor, or mounted on the exterior of the rear door, or other location) of the OE supplied spare tire;**
  - h) **Whether the vehicle was manufactured with a brush guard, skid guard/plate, or other covering for the underside of the fuel tank (i.e., a protective guard);**
  - i) **Whether the vehicle was manufactured with a tow hitch or tow receiver, and if so the duty/class of the hitch or receiver, and**
  - j) **Whether the vehicle was manufactured with an electrical harness/connector for trailer lighting purposes.**

**Provide the table in Microsoft Access 2007, or a compatible format, entitled "SUBJECT PEER VEHICLE PRODUCTION DATA."**

Response:

*The data elements "a" through "j" are provided in the file titled "SUBJECT PEER VEHICLE PRODUCTION DATA" on the enclosed CD.*

Model	Model Year	# Manufactured for Sales/Lease
Passport	1994	22,367
	1995	36,629
	1996	19,300
	1997	21,693
	1998	25,435
	1999	27,499
	2000	20,493
	2001	16,997
	2002	5,999

*Note: The Passport was manufactured for Honda at Subaru-Isuzu Automotive (SIA) under a cooperative agreement with Isuzu Motors Limited. (IML). Thus, all production records were given to Honda from IML. Within the data submitted there is one instance where Honda did not receive information from IML that was requested in No. 1, as follows:*

*Honda was not provided with the spare tire information for 1 vehicle produced in model year 2000.*

2. State the number of each of the following, received by Honda, or of which Honda is otherwise aware, which relate to, or may relate to, the alleged defect in the subject and peer vehicles:
- Consumer complaints;
  - Field reports, including dealer field reports;
  - Reports involving a crash, or fire, based on claims against the manufacturer involving a death or injury, and notices received by the manufacturer alleging that a death or injury was caused by a possible defect in a subject peer vehicle;
  - Property Damage Claims;
  - Third-party arbitration proceedings where Honda is or was a party to the arbitration; and
  - Lawsuits, both pending and closed, in which Honda is or was a defendant or codefendant.

For subparts "a" through "f" state the total number of each item (e.g., consumer complaints, field reports, etc.) separately. Multiple incidents involving the same vehicle are to be counted separately. Multiple reports of the same incident are also to be counted separately (i.e., a consumer complaint and a field report involving the same incident in which a crash occurred are to be counted as a crash report, a field report and a consumer complaint).

In addition, for items "c" through "f" provide a summary description of the alleged problem and causal and contributing factors and Honda's assessment of the problem, with a summary of the significant underlying facts and evidence including any and all photographic evidence, third-party post-crash/inspection reports, deposition materials, etc. For items "c" through "f" identify the parties to the action, as well as the caption,

court, docket number, and date on which the complaint or other document initiating the action was filed and details of the resolution of the matter.

Include reports in which the subject peer vehicle was struck in the rear by another vehicle, or the subject peer vehicle itself, through its own momentum or movement, struck another vehicle or object, such as a tree, a pole, or bridge abutment. As used here, the term rear includes crashes in which the subject peer vehicle is struck by another vehicle, or strikes and object, at an angle that included the rear of the vehicle (i.e., clock points 5, 6, or 7), and is not limited to direct crashes to the rear of the subject peer vehicle. Fire reports where the ignition source was from other than the crash are responsive and are to be included in your response. Reports of fuel leaks or fires where no crash occurred, such as fuel leaks that occur in garages or from punctures from running over objects in the road (but unrelated to a crash), are not within the scope of the request. Also, reports in which the fuel leak or fire originated in the engine compartment area, or where the fire was caused by an electrical issue (e.g., dash wiring or seat heater) or from a non-vehicle related source (e.g., lit cigarette, or a lit match), as opposed to a crash related fuel leak and fire, are also outside the scope of this request.

Response:

*Honda did not identify any relevant reports for items in request No. 2.*

*Note: Honda does not have any fleets or participate in fleet sales.*

Source(s): Customer Relations, Tech Line, Field Reports, Claims and Lawsuits.

As of: January 4, 2013

3. Separately, for each item (complaint, report, claim, notice, or matter) within the scope of your response to Request No. 2, state the following information:
  - a) Honda's file number or other identifier used;
  - b) The category of the item, as identified in Request No. 2 (i.e., consumer complaint, field report, etc.);
  - c) Cause: 1) Whether the subject condition occurred due to the failure of or damage to a subject component or 2) Honda's assessment of the cause of the fire or fuel leak, or 3) whether the subject condition occurred due to an unknown, undetermined, or ambiguous causation.
  - d) Vehicle owner or fleet name (and fleet contact person), address, and telephone number;
  - e) Vehicle's VIN;
  - f) Vehicle's model;
  - g) Vehicle's model year;
  - h) Vehicle's mileage at time of incident;
  - i) Honda's estimate of the impact speed of the striking vehicle or object that contacted the rear of the subject peer vehicle;
  - j) The basis and/or analysis that substantiates the estimate provided in item i;
  - k) Incident date;
  - l) Report or claim date;
  - m) Whether a fire is alleged;
  - n) Whether property damage is alleged;
  - o) Number of alleged injuries, if any; and
  - p) Number of alleged fatalities, if any.

**Provide this information in Microsoft Access 2007, or a compatible format, entitled "REQUEST NUMBER TWO DATA."**

Response:

*Honda did not identify any relevant reports for items in request No. 2, and therefore does not have any material to submit for request No. 3.*

Source(s): Customer Relations, Tech Line, Field Reports, Claims and Lawsuits.  
As of: January 4, 2013

- 4. Produce copies of all documents related to each item within the scope of Request No. 2. The documents requested specifically include, but are not limited to, the following:**
- a) Any police reports relating to, or that may relate to, the crash, fuel leak or fire;
  - b) Any and all accident reconstruction reports and documents prepared by or for Honda or by or for any other party;
  - c) Any and all reports and exhibits related to the subject condition prepared by expert witnesses in support of a claim against Honda or in anticipation of testimony in any state or federal proceeding in which Honda was a party;
  - d) Transcripts and/or video recordings and exhibits of any and all depositions of persons designated as experts in any state or Federal proceeding related the subject condition in which Honda was a party;
  - e) Transcripts and/or video recordings and exhibits of any and all depositions of Honda employees in any state or Federal proceeding relating to the subject condition in which Honda was a party; and
  - f) Any and all documents consulted, created, or relied upon by Honda supporting its characterization of conclusions related to the causation of any fuel related leak and/or fire related to the subject condition.

Response:

*Honda did not identify any relevant reports for items in request No. 2, and therefore does not have any material to submit for request No. 4.*

*However, if Honda were in possession of material responsive to request No. 4, we would object to requests 4(b)-(f) on the grounds that they are unduly burdensome, seek information not directly relevant to the subject matter of the EA, and seek information protected from disclosure by the attorney-client privilege and/or attorney work product protection doctrine.*

- 5. For each subject peer vehicle model and model year, provide the following:**

**Separately, for each such claim, state the following information:**

- a) Model, model year, and platform designation;
- b) Type of material the fuel tank is composed of (e.g., HDPE plastic);
- c) Side, rear and top view drawings showing the placement of the subject components and related components that secure them in the vehicle;

- d) A bottom view drawing or photograph showing the full vehicle undercarriage in the fully built configuration including the locations of the subject components;
- e) Overall length of the vehicle (in/cm);
- f) Wheel base (in/cm);
- g) Track Width (in/cm);
- h) Curb weight (lb/kg);
- i) Gross vehicle weight rating (lb/kg);
- j) Front gross axle weight rating (lb/kg);
- k) Rear gross axle weight rating;
- l) Interior volume (passenger and storage area);
- m) For any subject peer vehicles manufactured with a fuel tank located behind the rearmost axle, state the horizontal distance (in/cm) from aft most point of the rear axle to forward most point of the fuel tank;
- n) For any subject peer vehicles manufactured with a fuel tank located behind the rearmost axle, state the horizontal distance (in/cm) from aft most point of the fuel tank to the aft most point of the vehicle's rear bumper;
- o) For any subject peer vehicles manufactured with a fuel tank located behind the rearmost axle, state the vertical distance (in/cm) from bottom/lower most surface of the fuel tank to the bottom/lower most surface of vehicle's rear bumper at center line position (positive value indicates the tank surface is above bumper, negative value below the bumper);
- p) For any subject peer vehicles manufactured with a fuel tank located behind the rearmost axle, state the vertical distance (in/cm) from the ground/road surface to the bottom/lower surface of i) the vehicle's rear bumper at center line position, and ii) the vehicle's tow hitch at center line position (when equipped with a tow hitch);
- q) If not originally equipped with, whether or not a protective guard for the fuel tank was optionally available, and if so, the part number of the optionally available protective guard; and
- r) Whether the vehicle was equipped with an ORVR/Onboard Refueling Vapor Recovery system.

Response:

*The Passport was manufactured for Honda at Subaru-Isuzu Automotive (SIA) under a cooperative agreement with Isuzu Motors Limited (IML) thus, Honda defers to IML to provide the information described in request No. 5.*

6. Describe all assessments, analyses, tests, test results, design studies, studies, surveys, simulations, investigations, inquiries and/or evaluations (collectively, "actions") that relate to, or may relate to, the subject condition in the subject peer vehicles, and including all testing to Federal Motor Vehicle Safety Standard (FMVSS) No. 301 or any other contemplated or applicable corporate or internal fuel system integrity standards that have been conducted, are being conducted, are planned, or are being planned by, or for, Honda. For each such action, provide the following information:
- a) Action title or identifier;
  - b) The actual or planned start date;
  - c) The actual or expected end date;
  - d) Brief summary of the subject and objective of the action;
  - e) Results and related documents for FMVSS 301 testing including video and photos;

- f) Engineering group(s)/supplier(s) responsible for designing and for conducting the action; and
- g) A brief summary of the findings and/or conclusions resulting from the action.

For each action identified, provide copies of all documents related to the action, regardless of whether the documents are in interim, draft, or final form. Organize the documents chronologically by action.

Provide copies of any and all internal or corporate fuel system integrity standards used by Honda in the design and development of the subject peer vehicles that relate to the subject condition or to fuel system crash integrity in general, including those that exceed the requirements of federal standards or FMVSS 301.

Response:

*The Passport was manufactured for Honda at Subaru-Isuzu Automotive (SIA) under a cooperative agreement with Isuzu Motors Limited (IML) thus, Honda defers to Isuzu to provide the information described in request No. 6.*

Respectfully,

AMERICAN HONDA MOTOR CO., INC.



Jay Joseph  
Senior Manager  
Product Regulatory Office

JWJ:cm

Attachments