



Kia Motors America, Inc.

Corporate Headquarters

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July 31, 2015

VIA FEDERAL EXPRESS

Scott Yon, Chief
Office of Defects Investigation
U.S. Department of Transportation
National Highway Traffic Safety Administration
1200 New Jersey Avenue, S.E.
Washington D.C. 20590

Re: **Preliminary Evaluation (PE15-027)**
Driver Airbag Inflators Manufactured by ARC Automotive, Inc.

Dear Mr. Yon:

This letter is submitted in response to your letter dated July 17, 2015 sent to Kia Motors America ("Kia") (Reference NVS-212sly/PE15-027). That letter requested information regarding allegations of airbag inflator ruptures involving driver air bag inflators manufactured by ARC Automotive, Inc. (ARC).

REQUEST NO. 1:

State, by model and model year, the number of subject vehicles equipped with the subject component that Kia has manufactured, during the subject production time frame, for sale or lease in the United States. Separately, for each subject vehicle equipped with the subject component manufactured by Kia, during the subject production time frame, state the following:

- a. Vehicle identification number (VIN);
- b. Make;
- c. Model;
- d. Model Year;
- e. Subject component part number and design version installed as original equipment;
- f. Date of manufacture;
- g. Date warranty coverage commenced; and
- h. The State in the United States where the vehicle was originally sold or leased (or delivered for sale or lease).

Describe in detail the process Kia used to determine the vehicles in the subject vehicle population equipped with the subject component, including why Kia believes the process was

thorough and comprehensive. Provide the table in Microsoft Access 2010, or a compatible format, entitled "PRODUCTION DATA."

RESPONSE TO REQUEST NO. 1:

The total number of Kia vehicles equipped with the subject component that were manufactured for sale in the United States from June 2000 up to November 2004 is 154,634. A breakdown of the applicable models and model years is summarized in the chart below:

	Optima	Sportage
2001MY	24,754	--
2002MY	27,593	--
2003MY	23,340	--
2004MY	64,999	--
2005MY	13,227	721
TOTAL	153,913	721

In order to determine the subject vehicle population containing the subject component, KMC requested that ARC Korea identify all airbag modules with ARC inflators that were supplied for use in Kia vehicles since calendar year 2000. KMC also contacted its Tier 1 airbag suppliers and requested that they identify all airbag modules equipped with ARC inflators that were supplied to Kia for use in Kia vehicles produced since calendar year 2000. KMC then checked its own internal airbag module drawings for all Kia vehicles produced since calendar year 2000 to confirm the information it had received from ARC and its airbag suppliers was correct. KMC then determined which Kia models and model years fell within the scope of the subject vehicle population containing the subject component.

A listing of the 2001-2005 MY Optima and 2005 MY Sportage vehicles manufactured during the subject production time frame which are equipped with the subject component is provided on a Data Collection Disc under the category "PRODUCTION DATA" submitted with this response.

REQUEST NO. 2:

State the number of each of the following, received by Kia, or of which Kia is otherwise aware, which relate to, or may relate to, the alleged defect in the subject vehicles:

- a. Consumer complaints, including those from fleet operators;
- b. Field reports, including dealer field reports;
- c. Reports involving a crash, injury, or fatality;
- d. Property damage claims;
- e. Third-party arbitration proceedings where Kia is or was a party to the arbitration; and
- f. Lawsuits, both pending and closed, in which Kia 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 Kia’s assessment of the problem, with a summary of the significant underlying facts and evidence. For item “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.

RESPONSE TO REQUEST NO. 2:

- a. Consumer Communications—0
- b. Field Reports—0
Technical Assistance Reports—0
- c. Reports involving crash, injury, or fatality—1 (previously reported to NHTSA)
- d. Property Damage Claims—0
- e. Third Party Arbitrations—0
- f. Lawsuits—1

The summary description for “c-f” is under the Kia Assessment column in the REQUEST NUMBER TWO DATA file on the Data Collection Disc submitted with this response.

REQUEST NO. 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. Kia’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. Vehicle owner or fleet name (and fleet contact person), street address, email address and telephone number;
- d. Vehicle’s VIN;
- e. Vehicle’s make, model and model year;
- f. Vehicle’s mileage at time of incident;

- g. Incident date;
- h. Report or claim date;
- i. Whether a crash is alleged;
- j. Whether property damage is alleged;
- k. Number of alleged injuries, if any; and
- l. Number of alleged fatalities, if any.

Provide this information in Microsoft Access 2010, or a compatible format, entitled "REQUEST NUMBER TWO DATA."

RESPONSE TO REQUEST NO. 3:

The responsive communication identified in Request No. 2 is a lawsuit complaint and is provided on a Data Collection disc under the category "REQUEST NUMBER TWO DATA" and submitted with this response.

REQUEST NO. 4:

Produce copies of all documents related to each item within the scope of Request No. 2. Organize the documents separately by category (i.e., consumer complaints, field reports, etc.) and describe the method Kia used for organizing the documents. Describe in detail the search methods and search criteria used by Kia to identify the items in response to Request No. 2.

RESPONSE TO REQUEST NO. 4:

A copy of the lawsuit complaint responsive to Request No. 2 is submitted with this letter. See **Tab A**. The search method used to obtain the data identified in response to Request No. 2 is as follows: all files through July 21, 2015 which included the words "accident" and "airbag" or "air bag" and "metal"; "accident" and "airbag" or "air bag" and "fragment"; "accident" and "airbag" or "air bag" and "shrapnel"; "accident" and "airbag" or "air bag" and "plastic"; "crash" and "airbag" or "air bag" and "metal"; "crash" and "airbag" or "air bag" and "fragment"; "crash" and "airbag" or "air bag" and "shrapnel"; "crash" and "airbag" or "air bag" and "plastic" for the subject vehicles. The results were then reviewed to identify those items which related, or may relate to the alleged defect as described in your letter.

Sincerely,



J.S. (Jurassic) Park
Executive Director, Product Liability &
Regulatory Compliance Kia Motors
America, Inc.