

HONDA

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

July 28, 2020

Mr. Jeffrey Giuseppe
Associate Administrator for Enforcement
National Highway Traffic Safety Administration
Attn: Recall Management Division (NVS-215)
1200 New Jersey Avenue, SE
Washington, D.C. 20590

Re: Part 573, Noncompliance Information Report
2019 – 2020 Model Year Honda Odyssey
Rearview Camera

Dear Mr. Giuseppe:

In accordance with the National Traffic and Motor Vehicle Safety Act and 49 CFR Part 573 Defect and Noncompliance and Responsibility Reports, Honda is submitting the enclosed Noncompliance Information Report regarding a safety recall of 2019 – 2020 model year Honda Odyssey vehicles to address a noncompliance with FMVSS 111; Rear Visibility.

If you have any questions about this report, please feel free to contact me.

Sincerely,

AMERICAN HONDA MOTOR CO., INC.



Jeff Chang
Senior Manager
Product Regulatory Office

Noncompliance Information Report

573.6(c)(1)

Name of manufacturer: Honda of America Mfg., Inc.

Manufacturer's agent: Jeff Chang
American Honda Motor Co., Inc.
1919 Torrance Blvd.
Torrance, CA 90501-2746

573.6(c)(2)

Identification of potentially affected vehicles:

<u>Make/Model</u>	<u>Model Year</u>	<u>Dates of Manufacture</u>	<u>Number of Vehicles</u>
Honda Odyssey	2019	04/12/2018 to 08/13/2019	138,594
Honda Odyssey	2020	09/11/2018 to 07/16/2020	73,474

Description of the basis for the determination of the recall population:

The recall population was determined based on manufacturing records. The manufacturing range reflects all possible vehicles that could potentially experience the problem.

Description of how the vehicles being recalled differ from similar vehicles not included in the recall:

2018MY Honda Odyssey vehicles equipped with the affected component are not included in the recall as these vehicles were not subject to the phase-in period requirements nor final requirements of FMVSS No. 111; Rear Visibility. Honda did not certify these vehicles for phase-in compliance, nor were they built on or after the date of May 1, 2018, when all FMVSS No. 111 requirements applied to all vehicles. Therefore, Honda will conduct a Product Update Campaign in September 2020 to notify owners of 2018MY Odyssey vehicles of the same free remedy as provided under this recall. Additionally, similar vehicles built on or after July 20, 2020 are not included in the recall, as these vehicles were installed with redesigned rearview cameras compliant with the requirements of FMVSS No. 111 as of that date. Similar vehicles built before July 20, 2020 that were within American Honda's control were remedied prior to dealer delivery.

Identification of affected component:

Component: Camera Assy, Rearview
Part No.: 39530-THR-A21
Country of Origin: USA
Manufacturer: Magna Electronics, Inc.

573.6(c)(3)

Total number of potentially affected vehicles: 212,068

573.6(c)(4)

Percentage of affected vehicles that contain the noncompliance: 100%

573.6(c)(5)

Noncompliance description:

The rearview camera may not comply with the requirements of FMVSS No. 111 in certain scenarios.

1) Moisture entering through the rearview camera mounting holes can promote fracturing in the housing originally formed during the production process. Once the housing wall separates from the accelerated fracturing, moisture may enter the camera lens and distort the rearview image, or corrode the camera circuit board, resulting in an inoperative rearview camera.

2) The rearview camera has multiple viewing modes (wide, normal, and top-down view). If the view mode is set to top-down view, or switched from top-down view to another mode, and the rearview camera is activated in high ambient light environments, the resulting shutter speed that determines image brightness exceeds operating parameters, preventing the image from displaying.

A distorted or inoperative rearview camera display can reduce the driver's view of what is behind the vehicle, increasing the risk of a crash.

573.6(c)(7)

Determination of noncompliance:

October 2018

Honda launched an investigation into rearview camera failure.

April 2019 – July 2019

In consultation with the rearview camera supplier, the investigation confirmed moisture intrusion through micro fractures in the rearview camera's mounting holes resulted in failure. Root cause analysis continues.

August 2019

Cross-company development teams shared information regarding a programming error in the rearview camera circuit, which could prevent the image from displaying when operated under specific conditions (top-view mode in high ambient light environments).

May 2020

The investigation into the moisture intrusion phenomenon confirmed that improper design specification was the root cause.

July 21, 2020

Honda determined that FMVSS noncompliance existed and decided to conduct a noncompliance recall.

573.6(c)(8)(i)

Program for remedying the noncompliance:

Registered owners of all affected vehicles will be contacted by mail and asked to take their vehicle to an authorized Honda dealer. The dealer will replace the rearview camera with a redesigned camera for free. Because the new vehicle limited warranty on all affected vehicles would have provided a free repair for the problem addressed by this recall, without any payment by the owner, reimbursement for pre-notification repairs will not be offered.

573.6(c)(8)(ii)

The estimated date to start notification to dealers: July 29, 2020

The estimated date to start notifications to owners: September 23, 2020

573.6(c)(10)

Representative copies of all notices, bulletins and other communications:

A copy of the dealer service bulletin, the final owner notification letter and other dealer communication will be submitted to your office as soon as possible.

A draft of the owner notification letter will be submitted to your office as soon as possible.

573.6(c)(11)

Manufacturer's campaign number: W83