

**HONDA**

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

August 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: NHTSA Recall No. 20V-438  
Part 573, Amended Noncompliance Information Report  
2019-2020 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 amended Noncompliance Information Report regarding NHTSA recall number 20V-438 originally submitted on July 28, 2020. The amendment adds two MY2020 Honda Odyssey vehicles to the affected vehicle population. The following reporting categories are being amended:

1. Identification of potentially affected vehicles; and
2. Total number of potentially affected vehicles.

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

JC:wvt

## Amended Noncompliance Information Report

573.6(c)(2)

### Identification of potentially affected vehicles:

#### Initial Report

<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

#### Amended Report (updates in bold)

<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 <b>07/21/2020</b>	<b>73,476</b>

### 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.

#### 8/28/2020 Amendment

Two MY2020 Honda Odyssey vehicles with a manufacture date of July 21, 2020 are being added to the recall. Although these vehicles completed final assembly after the date the countermeasure was applied to mass production, they were initially assembled with the recalled component prior to being taken off-line for unrelated repairs. Once repaired, vehicle assembly completed on July 21, 2020, and the vehicles were distributed into commerce. Review of manufacturing records later identified the recalled component that necessitated inclusion into the recall.

573.6(c)(3)

### Total number of potentially affected vehicles:

212,068 (original population)
+ <u>2</u> (population expansion)
212,070 (amended population)