



January 14, 2014

Mr. Jeffrey Quandt
Chief, Vehicle Control Division
Office of Defects Investigation
National Highway Traffic Safety Administration
1200 New Jersey Avenue, SE
Washington, D.C. 20590

RE: NVS-213swm, PE13-033

Dear Mr. Quandt:

On behalf of Hyundai Motor Company (Hyundai), Hyundai America Technical Center, Inc. (HATCI) hereby submits this letter responding to the above referenced request as Hyundai's designated representative.

Prior to responding to the Information Request, Hyundai notes that it considers the definition of "document" in the Information Request to be unreasonably broad, vague, and ambiguous, and to exceed the scope of records that might reasonably be expected to bear relevant information.

Hyundai's response to this Information Request was based on searches of locations where documents determined to be responsive to the information request would normally be found and in consultation with current personnel knowledgeable about the information requested. As a result, the scope of this search did not include, nor could it reasonably include, "all of its past and present officers and employees, whether assigned to principal offices or any field or other location, including all divisions, subsidiaries (whether or not incorporated) and affiliated enterprises and all of headquarters, regional, zone and other offices and their employees, and all agents, contractors, consultants, attorneys and law firms and other persons engaged directly or indirectly (e.g., employee of a consultant) by or under the control of Hyundai (including all business units and persons previously referred to), who are or, in or after January 1, 2005, were involved in any way with any of the following related to the alleged defect in the subject vehicles:

- a. Design, engineering, analysis, modification or production (e.g. quality control);
- b. Testing, assessment or evaluation;
- c. Consideration, or recognition of potential or actual defects, reporting, record-keeping and information management (e.g., complaints, field reports, warranty information, part sales), analysis, claims, or lawsuits; or

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HATCI is an authorized representative of both Hyundai Motor Company and Kia Motors Corporation; which are separate and distinct automotive manufacturers.

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- d. Communication to, from or intended for zone representatives, fleets, dealers, or other field locations, including but not limited people who have the capacity to obtain information from dealers.”

Hyundai construes the Information Request as pertaining to vehicles manufactured for sale in the United States and its territories.

Requests and Responses

Request 1.

State, by model and model year, the number of subject and peer vehicles Hyundai has manufactured for sale or lease in the United States or federalized territories. Separately, for each subject vehicle manufactured to date by Hyundai, state the following:

- a. Vehicle identification number (VIN);
- b. Model;
- c. Model Year;
- d. Date of manufacture;
- e. Date warranty coverage commenced;
- f. The State in the United States or federalized territory where the vehicle was originally sold or leased (or delivered for sale or lease);
- g. Date subject service campaign completed; and
- h. The State in the United States or federalized territory where the subject campaign was completed.

Provide the table in Microsoft Access 2010, or a compatible format, entitled “PRODUCTION DATA.” See Enclosure 1, Data Collection Disc, for a pre-formatted table which provides further details regarding this submission.

Response to Request 1.

MODEL/MODEL YEAR	2009	2010	2011	2012
GENESIS	19666	10457	17378	28252
EQUUS	-	-	3309	2854

Refer to ATTACHMENT “PE13-033 PRODUCTION DATA.accdb” for requested information.

Sources: Hyundai Motor America, Hyundai Motor Company
Information as of December 18, 2013

Request 2.

State, by model and model year, the number of subject and peer vehicles Hyundai has manufactured for sale or lease in the United States and federalized territories for which Hyundai

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sold an extended service plan. Separately, for each vehicle, state the following (if a vehicle had more than one plan, such as a maintenance plan and an extended service repair plan, then list the vehicle separately for each plan that it had):

- a. Vehicle identification number (VIN);
- b. Model;
- c. Model Year;
- d. Name of the extended service plan;
- e. The mileage at which the extended service plan expires; and
- f. The number of months from the warranty start date at which the extended service plan expires.

Provide the table in Microsoft 2010, or a compatible format, entitled "EXTENDED SERVICE PLAN DATA." See Enclosure 1, Data Collection Disc, for a pre-formatted table which provides further details regarding this submission.

Response to Request 2.

		Hyundai Protection Plan			
Model	Model Year	Silver	Gold	Gold Plus	Platinum
EQUUS	2011	1	1	7	319
EQUUS	2012	2	4	10	194
GENESIS	2009	0	0	422	948
GENESIS	2010	52	123	3	1681
GENESIS	2011	13	26	5	1431
GENESIS	2012	29	56	5	2159

Refer to ATTACHMENT "PE13-033 EXTENDED SERVICE PLAN DATA.accdb" for requested information.

Source: Hyundai Motor America
Information as of November 15, 2013

Request 3.

State the number of each of the following, received by Hyundai, or of which Hyundai is otherwise aware, which relate to, or may relate to, the alleged defect in the subject and peer 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;

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- e. Third-party arbitration proceedings where Hyundai is or was a party to the arbitration; and
- f. Lawsuits, both pending and closed, in which Hyundai 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 Hyundai’s assessment of the problem, with a summary of the significant underlying facts and evidence. For items “e” and “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 3.

- a. Consumer complaints, including those from fleet operators;

87 Consumer Contacts relating to the Genesis.

1 Consumer Contact relating to the Equus.

- b. Field reports, including dealer field reports;

Five Field Reports relating to the Genesis.

No Field Reports relating to the Equus.

- c. Reports involving a crash, injury or fatality

Six of the consumer contacts report a collision, including two reports of minor injuries (headaches, backache and alleged whiplash).

No reports relating to the Equus.

- d. Property damage claims;

Five of the six referenced reports in the response to 3c. above include reports of property damage.

No reports of property damage relating to the Equus.

- e. Third-party arbitration proceedings where Hyundai is or was a party to the arbitration; and

None

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- f. Lawsuits, both pending and closed, in which Hyundai is or was a defendant or codefendant.

None

Source: Hyundai Motor America
Information as of November 20, 2013

Request 4.

Separately, for each item (complaint, report, claim, notice, or matter) within the scope of your response to Request No. 3, state the following information:

- a. Hyundai's file number or other identifier used;
- b. The category of the item, as identified in Request No. 3 (i.e., consumer complaint, field report, etc.);
- c. Vehicle owner or fleet name (and fleet contact person), address, and telephone number;
- d. Vehicle's VIN;
- e. Vehicle's 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 "COMPLAINT DATA." See Enclosure 1, Data Collection Disc, for a pre-formatted table which provides further details regarding this submission.

Response to Request 4.

Refer to ATTACHMENT "PE13-033 COMPLAINT DATA.accdb" for requested information.

Source: Hyundai Motor America
Information as of November 20, 2013

Request 5.

Produce copies of all documents related to each item within the scope of Request No. 3. Organize the documents separately by category (i.e., consumer complaints, field reports, etc.) and describe the method Hyundai used for organizing the documents.

Response to Request 5.

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- Refer to “Consumer Contact File Information.accdb” file in ATTACHMENT A for Consumer Contact case information.
- Refer to ATTACHMENT A for Field Report files. Files identified with VIN.

Source: Hyundai Motor America
Information as of November 20, 2013

Request 6.

State, by model and model year, a total count for all of the following categories of claims, collectively, that have been paid by Hyundai to date that relate to, or may relate to, the alleged defect in the subject and peer vehicles: warranty claims; extended warranty claims; claims for good will services that were provided; field, zone, or similar adjustments and reimbursements; and warranty claims or repairs made in accordance with a procedure specified in a technical service bulletin or customer satisfaction campaign.

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

- Hyundai's claim number;
- Vehicle owner or fleet name (and fleet contact person) and telephone number;
- VIN;
- Repair date;
- Vehicle mileage at time of repair;
- Repairing dealer's or facility's name, telephone number, city and state or ZIP code;
- Labor operation number;
- Problem code;
- Replacement part number(s) and description(s);
- Concern stated by customer;
- Cause and correction;
- Additional comments, if any, by dealer/technician relating to claim and/or repair;
- Whether the claim was included in Hyundai's analysis of warranty claim rates when the subject service campaign was launched in March 2013, as cited in section 573.6(c)(6) of the October 28, 2013 defect notification report letter for the Subject Recall (yes/no);
- Whether the claim involves a vehicle that had previously received the repair procedure for the Subject Campaign (yes/no).

Provide this information in Microsoft Access 2010, or a compatible format, entitled “WARRANTY DATA.” See Enclosure 1, Data Collection Disc, for a pre-formatted table which provides further details regarding this submission.

Response to Request 6.

Warranty Claims:

MODEL/MODEL YEAR	2009	2010	2011	2012
GENESIS	1386	297	18	15
EQUUS	-	-	1	0

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Refer to ATTACHMENT "PE13-033 WARRANTY DATA.accdb" file for additional requested information.

Source: Hyundai Motor America
Information as of December 09, 2013

Request 7.

Describe in detail the search criteria used by Hyundai to identify the claims identified in response to Request No. 6, including the labor operations, problem codes, part numbers and any other pertinent parameters used. Provide a list of all labor operations, labor operation descriptions, problem codes, and problem code descriptions applicable to the alleged defect in the subject vehicles. State, by make and model year, the terms of the new vehicle warranty coverage offered by Hyundai on the subject vehicles (i.e., the number of months and mileage for which coverage is provided and the vehicle systems that are covered). Describe any extended warranty coverage option(s) that Hyundai offered for the subject vehicles and state by option, model, and model year, the number of vehicles that are covered under each such extended warranty and indicate which plans would cover the subject component.

Response to Request 7.

The claims were identified by searching for all warranty claims for Hydraulic Electronic Control Unit replacements with customer descriptions potentially related to the alleged defect.

See ATTACHMENT "PE13-033 WARRANTY CODES.xlsx" for a list of all labor operations, labor operation descriptions, problem codes, and problem code descriptions applicable to the claims provided in response to Request No. 6.

The Hyundai New Vehicle Limited Warranty period is limited to 60 months from the date of original retail delivery or date of first use, or 60,000 miles, whichever occurs first. The HECU unit is covered by the Hyundai New Vehicle Limited Warranty.

The response to Request 2 describes the extended warranty option plans offered for the subject vehicles. Hyundai Protection Plans Gold, Gold Plus, and Platinum plans would cover the subject component. See ATTACHMENT "Extended Service Plan Description.pdf" for a description of the extended service plans.

Source: Hyundai Motor America
Information as of December 09, 2013

Request 8.

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Produce copies of all service, warranty, and other documents that relate to, or may relate to, the alleged defect in the subject vehicles, that Hyundai has issued to any dealers, regional or zone offices, field offices, fleet purchasers, or other entities. This includes, but is not limited to, bulletins, advisories, informational documents, training documents, or other documents or communications, with the exception of standard shop manuals. Also include the latest draft copy of any communication that Hyundai is planning to issue within the next 120 days.

Response to Request 8.

Refer to ATTACHMENT B for the requested information.

Request 9.

Describe all assessments, analyses, tests, test results, studies, surveys, simulations, investigations, inquiries and/or evaluations (collectively, "actions") that relate to, or may relate to, the alleged defect in the subject vehicles that have been conducted, are being conducted, are planned, or are being planned by, or for, Hyundai. 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. Engineering group(s)/supplier(s) responsible for designing and for conducting the action; and
- f. 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.

Response to Request 9.

In response to Request 14, Hyundai is providing testing conducted prior to the service campaign to evaluate field performance. On October 28, 2013, Hyundai notified NHTSA of a safety recall to replace the brake fluid and if necessary the HECU module in the subject vehicles. Hyundai is not considering a further test program at this time.

Request 10.

Describe all modifications or changes made by, or on behalf of, Hyundai in the design, specification, material composition, manufacture, quality control, supply, or installation of the subject component or brake fluid, from the start of production to date, which relate to, or may

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relate to, the alleged defect in the subject vehicles. For each such modification or change, provide the following information:

- a. The date or approximate date on which the modification or change was incorporated into vehicle production;
- b. A detailed description of the modification or change;
- c. The reason(s) for the modification or change;
- d. The part number(s) (service and engineering) of the original component;
- e. The part number(s) (service and engineering) of the modified component;
- f. Whether the original unmodified component was withdrawn from production and/or sale, and if so, when;
- g. When the modified component was made available as a service component; and
- h. Whether the modified component can be interchanged with earlier production components.

Also, provide the above information for any modification or change that Hyundai is aware of which may be incorporated into vehicle production within the next 120 days.

Response to Request 10.

ATTACHMENT C contains information regarding a change made on March 29, 2012, to add black oxide coating to the valve armature. The change was made based upon the potential for corrosion to develop as the result of the combination of the brake fluid with that supplier's product. No part number or other actions were associated with this production change. Field equipment is addressed by replacing the brake fluid or, if necessary, replacing the HECU module.

Request 11.

Produce:

- a. Exemplar samples of each design version of the HECU valve armatures affected by the alleged defect; and
- b. Field return samples of the valve armatures exhibiting the subject failure mode.

Response to Request 11.

Requested samples have been sent to NHTSA via Federal Express.

- a. Available New Modules
 - 58920-3M050-QQH
 - 58920-3M060-QQH
 - 58920-3M360-QQH
 - 58920-3N300-QQH
- b. Field Modules
 - HECU from KMHGC46E19U [REDACTED] replaced on 12/12/13

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- HECU from KMHGC46E19U [REDACTED] replaced on 12/11/13

Request 12.

State the number of subject components that Hyundai has sold that may be used in the subject vehicles by component name, part number (both service and engineering/production), and month/year of sale (including the cut-off date for sales, if applicable).

For each component part number, provide the supplier's name, address, and appropriate point of contact (name, title, and telephone number) and identify, by model and model year all vehicles using the part.

Response to Request 12.

Refer to ATTACHMENT D for requested information.

Request 13.

Provide the following information regarding the subject vehicle brake system and the alleged defect condition:

- a. Provide a schematic of the brake hydraulic system and describe system operation in each mode of brake control;
- b. Identify all brake system control valves that are affected by the alleged defect condition;
- c. Provide a detailed description of all brake system diagnostics related to the alleged defect condition;
- d. Provide a detailed description of the control valve failure mechanism; and
- e. Provide a detailed description of the effects of the alleged defect on brake system performance.

Response to Request 13.

Refer to ATTACHMENT E for schematics of the brake hydraulic system and identification of the brake system control valves that may be affected. Should the valve armature become subject to corrosion, brake fluid could leak and result in gel build-up within the HECU module. The gel build-up can interfere with the performance of the brake system, and result in a low/soft brake pedal with reduced brake effectiveness.

Request 14.

Provide a chronological list of all brake performance testing conducted by or for Hyundai on the subject and peer vehicles, including compliance testing, testing related to internal engineering specifications/requirements and testing related to the alleged defect condition. Provide the following information in the log and provide copies of all related test reports:

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- a. Test number;
- b. Test date;
- c. Purpose of the test; and
- d. Summary of test results.

Response to Request 14.

ATTACHMENT F contains certification test reports relating to FMVSS 135 and 126. Also included are test analyses that were conducted in 2012 to evaluate information provided by the supplier of the HECU module and returned field parts. The test results suggested that while braking effectiveness could be affected, stopping distance remained within needed parameters. The testing also found that corrosion could potentially result from the combination of the brake fluid with zinc-plated valve armatures.

Request 15.

Provide a detailed description of Hyundai's process for investigating potential safety defects and making decisions for conducting safety recalls, and produce all documents, including any forms, templates, or other reports or presentation materials that demonstrate, depict, or explain this process or any part of it. Identify which parts, offices, and specific staff are involved in the process or any part of it, whether domestic or international. This information and production request includes, but is not limited to, a request for:

- a. A process flowchart;
- b. An organizational chart that includes each part of the corporation that is involved in each step of the process;
- c. The name of the office responsible for conducting and/or managing the investigations;
- d. A description of Hyundai's process for documenting each stage of the process, including date opened, date closed, other meeting dates and all actions planned or completed at each;
- e. A description of all reports and presentation materials associated with stages of the process, e.g., Quality Information Reports and final report(s) for decision makers; and
- f. Copies of all such reports and presentation materials associated with Hyundai's review of the alleged defect in the subject vehicles for each related field action decision, including the subject service campaign, campaign revisions and the subject recall.
- g. Copies of any standardized reports, forms, templates, presentation guidelines, or any other materials that demonstrate or depict the information or content that is typically provided to Hyundai management, whether domestic or international in deciding whether to perform a corrective field action to address a safety concern, including but not limited to a concern that rises to the level of a safety recall.
- h. To the extent not addressed in your earlier responses, describe what role or input, if any, Hyundai Motors America (HMA) and Hyundai-Kia America Technical Center, Inc. (HATCI), have in Hyundai's process for investigating, making defect determinations and safety recall decisions. Identify which parts, offices, and specific staff are involved in the process or any part of it, whether domestic or international.

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Response to Request 15.

Hyundai Motor Company takes seriously its obligation to remedy and identify safety related defects, and to be responsive to concerns arising in the US market. ATTACHMENT G contains a Procedure Flowchart that shows the general process through which Hyundai investigates and makes decisions once field issues in the United States have been identified. Hyundai follows essentially the same process when potential safety related defects are brought to the company's attention by suppliers or from markets other than the United States.

Also attached is a basic Organizational Chart showing the chain of responsibility within Hyundai for investigations and decisions. The investigation and recall process is managed within Hyundai's Quality Division. Once issues are identified, the Quality Assurance Group oversees the investigation in conjunction with the relevant teams. The results of the investigation are reported to the Quality Division, which is responsible for the decision as to whether or not a field repair is needed and, if so, whether to conduct a service campaign or a safety recall.

The relevant markets, including in particular the US market, are involved in identifying field issues and in discussions concerning any contemplated or necessary field campaigns. Discussions involving the US typically include both HATCI and HMA. A network of coordinators between the US offices and Korea ensure that communications, which are mostly telephonic, are effective and accurate.

Within Hyundai, Quality Information Reports are written to document identified technical conditions. Hyundai routinely submits these QIRs as part of its responses to Information Requests. A QIR form is attached for the agency's convenience. Also attached is a copy of a short and longer template report form often used by the Quality Division to evaluate the necessity for product action. It includes a description of the problem, a description of the field fix and additional relevant information. Forms relating to the 2012 service campaign and the 2013 recall are also attached.

Hyundai welcomes an opportunity to discuss its evaluation and decision making process further with the agency.

Request 16.

Provide the following information regarding the subject service campaign, and produce copies of all documents that support your response or demonstrate or document the information you provide:

- a. Provide a detailed description of the brake fluid condition addressed by the campaign, including the names of all sources/suppliers, assembly plants, and production period(s) affected;
- b. Provide a chronology describing Hyundai's investigation of the brake fluid condition and its effects on the subject component and brake system performance in the subject and peer vehicles;

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- c. Explain the purpose for the campaign and why the campaign bulletin does not state the reason for the brake fluid replacement;
- d. Describe how the problem was corrected in production and how Hyundai determined the scope of potentially affected vehicles;
- e. Describe, and provide copies of documents related to, all other dealer communications related to the brake fluid condition addressed by the campaign or to the diagnosis and repair of related brake performance complaints;
- f. Provide copies of all owner communications related to the brake fluid condition addressed by the campaign;
- g. Explain why Hyundai did not notify consumers about the campaign, the brake fluid issue or the possible effects on brake system performance;
- h. Describe how Hyundai evaluated the safety consequences of the condition, including:
 - i. Analysis of field data for effects and potential safety consequences;
 - ii. Analysis of field data for failure rates and trends, including analysis by build range, time in service, mileage, region or other factors;
 - iii. All testing performed to assess effects on brake system performance (i.e., cite which, if any, of the tests identified in response to Request #14 were used by Hyundai in its assess of the safety risk associated with the alleged defect); and
 - iv. Explain why the campaign was not conducted as a safety recall.

Response to Request 16.

Refer to ATTACHMENT H for supplier information.

The campaign addresses the condition referred to above involving the potential for corrosion to occur over the long term as the result of the combination of the brake fluid with zinc-plated valve armatures in the HECU modules. The campaign instructed dealers to replace the brake fluid. As described in Hyundai's Defect Information Report, the updated Technical Service Bulletin associated with the recall also includes, if necessary, replacing the HECU unit if it is determined a valve(s) is not functioning properly. The original campaign bulletin contained all of the information necessary for the dealers to identify the vehicles and to make the repair of replacing the brake fluid. The onset of any corrosion may occur over the longer term and, at the time of the original service campaign, Hyundai believed that replacing the brake fluid would resolve any potential for the onset of corrosion in the future. Hyundai later found that there were reports of continued problems after the brake fluid was replaced, and therefore decided to conduct a safety recall to replace the brake fluid in newer vehicles, and to inspect and if necessary to replace the HECU module in earlier production vehicles.

The issue was initially identified as a longer term potential problem by the supplier as the result of testing the supplier had conducted which showed the potential of corrosion. Hyundai replicated the testing and conducted comparative analyses. The comparative analysis determined that any potential corrosion would result from the combination of a brake fluid lacking an anti-corrosion element with a zinc-plated valve armature. Hyundai determined that the issue could potentially affect the Genesis and Equus models with HECU modules incorporating such armature. However, no safety risk was present as the potential for any corrosion would only occur over the longer term and the replacement of the brake fluid would resolve the concern. Hyundai instructed dealers through a Technical Service Bulletin to replace the brake fluid, and

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supplied the TSB to NHTSA per the agency's regulations. The service campaign was successful. The Equus campaign is largely complete and a majority of the Genesis vehicles were serviced prior to the opening of the PE.

Upon receiving the PE opening resume, Hyundai reviewed the warranty data associated with the service campaigns and discovered numerous reports of continued problems in the Genesis vehicles after the replacement of the brake fluid. Hyundai decided at that time to conduct a safety recall to capture the remaining Genesis vehicles and also to inspect and if necessary to replace the HECU module in earlier production vehicles that had previously had the brake fluid replaced.

Hyundai's responses above include additional information with regard to the testing conducted, the changes made in production and all dealer communications.

Request 17.

Provide the following information regarding the Subject Recall, and produce copies of all documents that support your response:

- a. Explain how Hyundai determined the scope of affected vehicles; and
- b. Explain how Hyundai validated the effectiveness of the repair procedures.

Response to Request 17.

The recall scope includes all vehicles with the subject brake fluid and zinc-plated valve armatures used by the HECU supplier. The company's testing indicated that the potential for corrosion over the long term was related to the combination of the brake fluid and the zinc-plated valve armatures. Through engineering judgment the company determined that replacing the brake fluid would eliminate the compromising combination and avert the onset of corrosion. Refer to ATTACHMENT I for additional information.

Request 18.

Provide counts, by model and model year, of worldwide sales of all other Hyundai products potentially affected by the alleged defect (i.e., with the same HECU control valve plating and brake fluid chemistry issues as the subject vehicles) and provide a table summarizing all actions taken by Hyundai to address the issue in markets outside the United States by country/market, date of action, description of action (e.g., safety recall, service campaign, warranty adjustment, no action), volume of affected vehicles and failure counts and rates at the time of the field action decision.

Response to Request 18.

The only additional vehicles potentially subject to the alleged defect are the Equus vehicles covered by the current service campaign. Hyundai began replacing brake fluid in those vehicles

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in Korea in March 2012 as part of a broader customer service program, and brought that program to the United States in September 2012. At the time that Hyundai initiated the service campaign for the Genesis and the Equus vehicles, the warranty claim rate for the HECU module in the United States was 0.93% for the Genesis and 0.07% for the Equus. The Equus service campaign is largely complete, with approximately 300 vehicles remaining to be repaired. Refer to ATTACHMENT J for information regarding markets outside the United States.

Request 19.

Provide a chronological summary of all communications with the subject component supplier related to the brake fluid condition addressed by the subject service campaign and subject safety recall, including the effects on the operation of the subject component and on brake system performance and provide copies of all documents received or sent by Hyundai as part of such communications or which relate in any way to Hyundai's internal reviews of such communications.

Response to Request 19.

ATTACHMENT K and L provide presentations and additional communication from the suppliers relating to the alleged defect.

Portions of ATTACHMENT K have been provided to the Office of Chief Counsel with a request for treatment as Confidential Business Information.

Request 20.

Furnish Hyundai's assessment of the alleged defect in the subject vehicle, including:

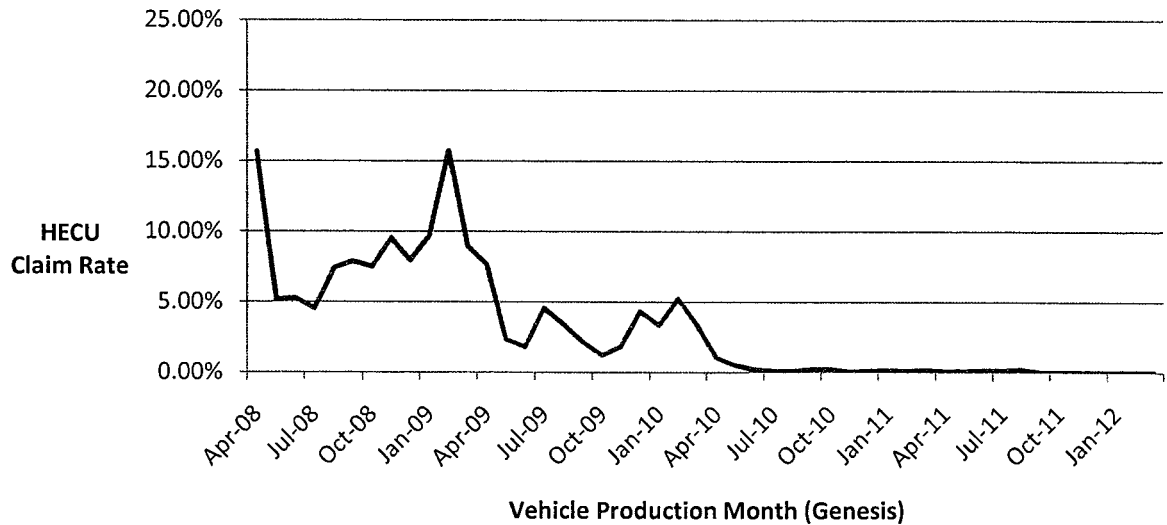
- a. The causal or contributory factor(s);
- b. The failure mechanism(s);
- c. The failure mode(s);
- d. The risk to motor vehicle safety that it poses;
- e. What warnings, if any, the operator and the other persons both inside and outside the vehicle would have that the alleged defect was occurring or subject component was malfunctioning; and
- f. The reports included with this inquiry.

Response to Request 20.

Hyundai notified NHTSA on October 28, 2013 of its decision to conduct a safety recall to replace the brake fluid and to replace the HECU module if necessary in the subject vehicles. The basis and methodology for the recall is described in the Defect Information Report. Hyundai believes the scope and approach to the recall continues to be appropriate. With regard to the subject vehicles, Hyundai will change the brake fluid, if necessary, and will inspect the vehicle to determine whether the HECU should be replaced. When the brake fluid has been replaced prior

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to the onset of corrosion, the HECU module is protected and does not require replacement. Hyundai's warranty claim analysis shows if the brake fluid has been previously replaced in vehicles built after June 1, 2010, the HECU module is adequately protected and does not require replacement. Hyundai's recall, therefore, directs dealers to replace the brake fluid in any vehicles that have not already had the brake fluid replaced and to inspect the HECU module in vehicles built prior to June 1, 2010 to determine whether the HECU module requires replacement:



Hyundai remains convinced that no recall is needed for the Equus. Hyundai has received only one warranty claim related to the alleged defect where the HECU module was replaced. Hyundai initiated a service campaign on the Equus vehicles in September 2012 and submitted the Technical Service Bulletin to NHTSA in accordance with Part 579. The service campaign is largely complete. The potential for corrosion-related issues in the HECU modules in Equus vehicles has been properly and effectively addressed.

Sincerely,

Robert Babcock
Director, Certification and Compliance Affairs
Hyundai-Kia America Technical Center, Inc.

Hyundai-Kia America Technical Center, Inc.

Attachments:

Two CDs, each containing:

PE13-033 PRODUCTION DATA.accdb
PE13-033 EXTENDED SERVICE PLAN DATA.accdb
PE13-033 COMPLAINT DATA.accdb
PE13-033 WARRANTY DATA.accdb
PE13-033 WARRANTY CODES.xlsx
Extended Service Plan Description.pdf
ATTACHMENT A
ATTACHMENT B
ATTACHMENT C
ATTACHMENT D
ATTACHMENT E
ATTACHMENT F
ATTACHMENT G
ATTACHMENT H
ATTACHMENT I
ATTACHMENT J
ATTACHMENT K
ATTACHMENT L

Benefits

The five plans come with the following additional benefits to keep you moving:

Rental Car Coverage	Reimbursement up to \$35 per day for up to 10 days.
Towing Coverage	Payment of up to \$75 in towing charges per covered mechanical breakdown.
Travel Coverage	If you're more than 100 miles from home when you break down, we will pay up to \$75 per day, up to \$375 per occurrence, for food and lodging.
Fluids Coverage	Replacement of necessary fluids, oils, greases, lubricants, and approved air conditioner gases that must be replaced in conjunction with a covered repair.
Improved Resale	Each plan is fully transferable, making your car more appealing to potential buyers.
Financing	The cost of the selected plan may be included in the financing of your vehicle.
Optional Tire Coverage	For an additional fee, you can include coverage for the repair or replacement of a tire that is damaged by a road hazard such as debris on the road or potholes.*

*Not available in all states.
See Service Contract for Complete Details.



Hyundai Protection Plan

When you choose the Hyundai Protection Plan that's right for you, you can purchase coverage up to an additional 100,000 miles, depending on the age and mileage of your vehicle. And if you buy protection now, you can include the cost of the plan you choose in the financing of your vehicle.

5 Coverage Levels*

- Powertrain Coverage
- + Silver Coverage
- ++ Gold Coverage
- +++ Gold Plus Coverage
- ++++ Platinum Coverage

* Coverage level availability may be limited based on the age and mileage of your vehicle.



■ **Toll-Free Claims Service** You get fast claims service and instant authorization of covered repairs via our toll-free number. Just call 1-866-367-9040. Our toll-free number gives you instant access to a Hyundai dealer near you.

■ **National Coverage** We provide peace of mind so that with a Hyundai Protection Plan, you are covered anywhere in the U.S., its territories or possessions, or Canada.

■ **Direct Payment** You do not have to pay and wait for reimbursement of authorized repairs.



Limitations of Coverage

This information is intended to provide only an outline of the types of coverages, exclusions and limitations of the service contracts described in this brochure and should not be relied upon when purchasing a specific service contract. For exact coverages, exclusions and limitations, please review the service contract itself. **The Hyundai Protection Plan is administered by Fidelity Warranty Services, Inc. Florida License #60026. 500 Jim Moran Boulevard, Deerfield Beach, FL 33442.**

VEHICLE PROTECTION PLAN for your Hyundai.



Powertrain covers the major components on your vehicle and offers protection against many major mechanical breakdowns.

ENGINE: Engine block and cylinder heads and all internally lubricated parts including pistons, piston rings, pins and cylinder sleeves; crankshaft, pulley, main bearings, caps and bolts; connecting rods, rod bearings, caps and bolts; camshaft(s), camshaft bearings, buttons and plugs; timing gears and timing chain or belt; rocker arms, rocker arm pivots, shafts and bushings; intake and exhaust valves, springs, guides, adjusters, retainers and seats; pushrods and lifters; intake manifold; exhaust manifolds; balance shaft; water pump; fuel pump; thermostat; oil pump, cover, gears, pressure relief valve and screen; rotor housing, rotors, shims and silent shaft; all internal fasteners, nuts and bolts; turbocharger/supercharger assembly including boost valve and wastegate; seals and gaskets.

TRANSMISSION/TRANSAXLE/TRANSFER CASE:

Transmission/transaxle case and all internally lubricated parts including ring and pinion gears; oil pump, cover, gears, housing and vanes; torque converter; valve body(s); throttle valve; valve pack; governor, gear and cover; parking gear and pawl; roll pins; sprags; sprockets; chain; springs; stator and shaft; pressure regulator valve; pressure switches; solenoids; bands; automatic transmission/transaxle clutch, drums, pistons and steel plates; planetary and sun gears; servos and rings; blockers; synchronizer hubs and keys; bearings; bushings; supports and shafts; control rings; yoke; extension housing; speedometer drive gears; accumulators and rings; adjusters; all internal fasteners, nuts and bolts; shift cover and forks; separate bell housing; transfer case and all internal parts contained within the transfer case; seals and gaskets. (STANDARD TRANSMISSION CLUTCH ASSEMBLIES AND ALL COMPONENT PARTS ARE NOT COVERED.)

DRIVE AXLE: Differential/axle housing(s) and all internally lubricated parts including the axle flange; ring and pinion gear/carrier assembly; spider gears and bearings; pins; retainers; positraction clutches, plates and springs; cover; seals and gaskets.

PLUS FEATURES OF POWERTRAIN COVERAGE:

Silver offers all of the same features of Powertrain, with the following additional benefits:

STEERING: Steering gear housing and internal parts including control rings, valves, pinion shaft, pitman shaft, worm shaft and gear, sector shaft, bearings, adjusters; rack and pinion housing and internal parts including control valve, rack bellows, mounts, rack shaft and yoke, spool valve, bearings; power steering pump and internal parts including housing, reservoir, shaft and vanes; power steering pump mounting brackets; seals and gaskets.

BRAKES: Master cylinder; vacuum or hydraulic brake booster assembly; hydraulic lines, hoses and fittings; brake pedal apply pin; seals and gaskets. (ABS COMPONENTS NOT COVERED.)

AIR CONDITIONING: Condensor; compressor; evaporator; orifice/expansion; seals and gaskets.

FRONT SUSPENSION: Upper and lower control arms, shafts and bushings; struts, housing and cartridge; spindle/steering knuckle and spindle support.

ELECTRICAL: Alternator housing and all internal parts including bearings, bushings, brushes, rectifier bridge, diodes, field coil and rotor; alternator mounting bracket; voltage regulator; starter motor housing and all internal parts including bushings, brushes, field windings, starter drive and solenoid.

Get on your way
to carefree driving
experience



PLUS FEATURES OF SILVER COVERAGE:

Gold offers all of the same features of Powertrain and Silver, with the following additional benefits:

ENGINE: Oil pan; valve, timing and side covers; thermostat housing; water pump pulley; engine mounts; harmonic balancer; flex plate/flywheel and ring gear.

TRANSMISSION: Oil pan; detent cable; kickdown link; TVI/throttle cable; vacuum modulator; transmission mounts.

DRIVE AXLE: Constant velocity joints; slip joint; front wheel drive axles/half-shafts and wheel bearings; u-joints; couplings; flex disc; prop shafts; center support bearings.

STEERING: Tie rods, idler and pitman arms, center/drag link, coupling and shafts; cooler lines.

BRAKES: Compensator/proportioning valve; metering valve; calipers, piston, seal and dust boot; wheel cylinders, cups, seals, spring and dust boots; backing plate; brake adjusters; brake pedal, pedal lever and pedal pivot; parking brake cable; ABS component parts including control processor/module, pump, dump valve, wheel speed sensors, solenoids, accumulator, and pressure differential switch.

AIR CONDITIONING: Accumulator; receiver drier; automatic temperature control programmer; clutch assembly including coil, disc and pulley; control cables; cutoff switch; serpentine belt tensioner, bearing and pulley.

FRONT SUSPENSION: Wheel bearings; ball joints and bushings; kingpin and bushings; stabilizer bar, links and bushings; torsion bar, mounts and bushings; track bar, links and bushings.

ELECTRICAL: Front and rear wiper motor, transmission and linkage; power window motor; window regulators; power seat motor; steering column multi-function switch and individual switches for turn signal, headlamp, dimmer, wiper, washer and speed control; mirror motor switch; brake light switch; neutral safety switch; glove box light switch; courtesy light switch; cooling fan relay; air control solenoid; air regulator valve; I.A.C. motor; electronic ignition module; electronic instrument panel module; ignition coil; engine distributor including shaft, gear, bushings and modules; throttle position sensor; vehicle speed sensor; M.A.P. sensor; knock sensor and barometric pressure sensor.

PLUS FEATURES OF GOLD COVERAGE:

Gold Plus offers all of the same features of Powertrain, Silver, and Gold, with the following additional benefits:

COOLING: Radiator, mounting brackets and coolant recovery tank; fan clutch, fan blades and motor; fan shroud; heater core; transmission cooler.

FUEL: Fuel lines; fuel pressure regulator; level sending unit; fuel injectors and seals; injection pump; ESC systems; fuel injection control components including mixture control processor, throttle body assembly, cutoff valve, fuel rail, fuel distributor, trigger contacts, cold start valve, fuel injection valve, fuel accumulator; tank; tank door latch; tank filler neck and o-ring.

AIR CONDITIONING: Compressor mounting brackets; idler pulley and bearings; air conditioning/heater blower motor.

STEERING: Steering wheel tilt and telescoping mechanism.

FRONT SUSPENSION: Coil and leaf springs, seats and bushings, leaf spring shackles; electronic level control components including pump, accumulator, lines and bags.

REAR SUSPENSION: Upper and lower control arms, shafts and bushings; upper and lower ball joints; struts, housing and cartridge; wheel bearings; spindle/steering knuckle and spindle support; coil and leaf springs, seats and bushings, leaf spring shackles; track bars, links and bushings; electronic level control components including pump, accumulator, lines, bags; stabilizer bar, links and bushings.

ELECTRICAL: Cruise control module, servo, cables and switches; instrument cluster including speedometer, odometer, tachometer and all gauges, warning indicators; burglar alarm or electronic entry systems including remote entry receiver, sender and module; door lock actuators; mirror motor; power window switch; power lock switch; rear window defogger; horn and relay; convertible top motor; sunroof motor; power antenna motor; electrical headlamp motor; power trunk/hatch release motor, switch and solenoid; power sliding door motor and switch; electronic control modules including body control module, electronic control unit, powertrain control module, transmission control module; electronic throttle control module; crank angle sensor; camshaft position sensor; throttle position motor; fuel pulse dampener; wide open throttle switch; thermo time switch; fuel pump relay; automatic temperature control sensor; ride height sensor and relay; oxygen (O2) sensor; mass air flow sensor; manifold differential pressure sensor; coolant temperature sensor; OEM radio/graphic equalizer/cassette tape player/compact disc player.

ULTIMATE PEACE OF MIND:

In addition to offering the same features of Powertrain, Silver, Gold, and Gold Plus, Platinum expands to cover almost all assemblies of your vehicle.

Platinum Exclusions

Under Platinum Coverage, the following parts are excluded:

Brake linings, brake drums and rotors, disc brake pads, standard transmission clutch components, air bags, solar powered devices, hinges, glass, lenses, sealed beams, body parts and/or panels, trim, moldings, door handles, lock cylinders, tires, wheels, batteries, light bulbs, upholstery, paint, bright metal, freeze plugs, heater and radiator hoses, exhaust system, shock absorbers, audio, security or other systems not factory installed, work such as front-end alignment or wheel balancing, constant velocity joint boots, safety restraint systems, cellular phones, electronic transmitting devices (except for those specifically listed under silver, gold, or gold plus coverage), radar detectors, appliances, near object avoidance systems and all laser radar cruise control components, vinyl and convertible tops.

Platinum Coverage
gives you the
“Ultimate Peace of
Mind” protection.

