



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

May 15, 2019

AHCERT- 190321

Administrator  
National Highway Traffic Safety Administration  
1200 New Jersey Avenue, S.E.  
Washington, D.C. 20590

ATTENTION: V.I.N. Coordinator

**RE: Vehicle Identification Numbers (VIN)**

Dear Administrator:

In accordance with 49 CFR, Part 565, Vehicle Identification Number Requirements, we are enclosing information specified in the regulation that is applicable for the 2020 model year Honda Odyssey.

Pursuant to Part 512, Honda has submitted a request to the Chief Counsel's Office that this information be treated as confidential until **August 13, 2019**.

Respectfully,

AMERICAN HONDA MOTOR CO., INC.

John Turley  
Senior Manager  
Product Regulatory Office

JT/rc

Enclosure(s)



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Torrance, CA 90501-2746  
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Office of the Chief Counsel  
National Highway Traffic Safety Administration  
1200 New Jersey Ave., SE  
Washington, DC 20590

**Re: Request for Confidentiality**

Dear Chief Counsel:

Enclosed for your consideration is a Request for Confidentiality for the information related to the matter referenced above. The specified information is required in accordance with 49 CFR, Part 565, Vehicle Identification Number Requirements.

In compliance with 49 CFR section 512.8(a), justification for this Request for Confidentiality is as follows:

- Honda does not customarily release this confidential information to the public nor can this information be determined by analyzing publicly available Honda products. Further, Honda measures to protect the confidentiality of this information include physical, information systems, process, and management controls that limit access to this information to authorized personnel only. Additionally, company and departmental restrictions prevent disclosure of this information to individuals within and outside of Honda who do not have a need to know it.
- Honda also notes that public disclosure of the specified pages would cause substantial competitive harm to position of Honda in the marketplace. This confidential information, which results from significant investments Honda has made in research, development, intellectual property, and human resources over an extensive period of time, has independent economic value and affects the financial position of Honda, business operations, and strategic plans. Release of this information would give current or future competitors the unfair advantage of free access to Honda-specific knowledge that was acquired at great expense to Honda.

This information is therefore entitled to confidential treatment pursuant to 49 CFR sections 512.15(a) & (b).

In accordance with 49 CFR section 512.8(d), Honda notes that this confidential information falls with a class that the Chief Counsel has presumptively determined is likely to result in substantial competitive harm if disclosed to the public. Specifically, the submitted information falls within class number two of Appendix B to Part 512, which is described as "future specific model plans (to be protected only until the date on which the specific model to which the plan pertains is first offered for sale)"

As a result of the foregoing, Honda requests that NHTSA ensure this information is accorded confidential treatment and not released to the public until **August 13, 2019**.

Please advise me of your decision on this matter at your earliest convenience.

Respectfully,

American Honda Motor Co., Inc.

A handwritten signature in black ink, appearing to read "John Turley", is written over the printed name and title.

John Turley  
Senior Manager  
Product Regulatory Office

JT/rc

cc: Administrator, NHTSA  
Enclosure


### CERTIFICATE IN SUPPORT OF REQUEST FOR CONFIDENTIALITY

I John Turley, pursuant to the provisions of 49 CFR Part 512, state as follows:

- 1) That I am Senior Manager of the Product Regulatory Office of the American Honda Motor Co., Inc., and that I am authorized by American Honda Motor Co., Inc., and Honda Motor Co., Ltd. (Honda), to make the following representations to the National Highway Traffic Safety Administration (NHTSA) on behalf of Honda;
- 2) I certify that information regarding new model year vehicle trim level (including number of trim levels) and powertrain information contained in the attached submission is confidential and proprietary and is being provided with the claim that this information is entitled to confidential treatment under 5 U.S.C. 552(b)(4) (as incorporated by reference in and modified by S505(d)(1) of Title 5 of the Motor Vehicle Information and Cost Savings Act), and 49 CFR sections 512.15(a) & (b);
- 3) I hereby request that the information contained in the submitted documents be protected until **August 13, 2019**;
- 4) That I have personally inquired of the responsible Honda employees, who have authority in the normal course of business to release the information for which a claim of confidentiality has been made, to ascertain whether such information has ever been released outside of Honda and its subsidiaries, and that Honda makes the following efforts to keep this information from being disclosed: physical, information systems, process and management controls that limit access to authorized personnel only, and company and departmental restrictions that prevent disclosure to individuals who do not have a need to know;
- 5) That based upon the responses to such inquiries, to the best of my knowledge, information, and belief, the information for which Honda has claimed confidential treatment has never been released or become available outside of Honda and its subsidiaries;
- 6) Based on information and belief, none of the information in the attached materials has been released outside of the governmental entity to which it is now being supplied;
- 7) That I make no representations beyond those contained in this certificate, and in particular I make no representations as to whether this information may have become available outside of Honda and its subsidiaries because of unauthorized or inadvertent disclosure, except as stated in Paragraph 5; and
- 8) I certify under penalty of perjury that the foregoing is true and correct.

Executed on this the 15<sup>th</sup> day of MAY, 2019.

John Turley



**VEHICLE IDENTIFICATION NUMBER  
49CFR PART 565**

HONDA & ACURA VIN

<b>A</b>	<b>A</b>	<b>A</b>	<b>B</b>	<b>B</b>	<b>B</b>	<b>B</b>	<b>B</b>	<b>C</b>	<b>D</b>	<b>E</b>	<b>F</b>	<b>F</b>	<b>F</b>	<b>F</b>	<b>F</b>	<b>F</b>
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**MODEL CODE**  
Refer to attached page

**CHECK DIGIT**  
Refer to 49CFR565.15(c)

**SEQUENTIAL PRODUCTION NUMBER**

**MANUFACTURER, MAKE & TYPE OF VEHICLE**

JHM - Honda Motor Co., Ltd. - HONDA, Passenger car  
 JH4 - Honda Motor Co., Ltd. - ACURA, Passenger car  
 JHL - Honda Motor Co., Ltd. - HONDA, Multipurpose Passenger Vehicle  
 JH1 - Honda Motor Co., Ltd. - HONDA, Truck  
 1HG - Honda of America Mfg., Inc. - HONDA, Passenger car  
 19U - Honda of America Mfg., Inc. - ACURA, Passenger car  
 5J6 - Honda of America Mfg., Inc. - HONDA, Multipurpose Passenger Vehicle  
 5J8 - Honda of America Mfg., Inc. - ACURA, Multipurpose Passenger Vehicle  
 5J7 - Honda of America Mfg., Inc. - HONDA, Truck  
 5J0 - Honda of America Mfg., Inc. - ACURA, Truck  
 5KB - Honda Mfg., Alabama, LLC - HONDA, Passenger car  
 5KC - Honda Mfg., Alabama, LLC - ACURA, Passenger car  
 5FN - Honda Mfg., Alabama, LLC - HONDA, Multipurpose Passenger Vehicle  
 5FR - Honda Mfg., Alabama, LLC - ACURA, Multipurpose Passenger Vehicle  
 5FP - Honda Mfg., Alabama, LLC - HONDA, Truck  
 5FS - Honda Mfg., Alabama, LLC - ACURA, Truck  
 19X - Honda Mfg., Indiana, LLC - HONDA, Passenger car  
 19V - Honda Mfg., Indiana, LLC - ACURA, Passenger car  
 7FA - Honda Mfg., Indiana, LLC - HONDA, Multipurpose Passenger Vehicle  
 2HG - Honda of Canada Mfg. - HONDA, Passenger car  
 2HH - Honda of Canada Mfg. - ACURA, Passenger car  
 2HK - Honda of Canada Mfg. - HONDA, Multipurpose Passenger Vehicle  
 2HN - Honda of Canada Mfg. - ACURA, Multipurpose Passenger Vehicle  
 2HJ - Honda of Canada Mfg. - HONDA, Truck  
 2HU - Honda of Canada Mfg. - ACURA, Truck  
 SHH - Honda of the U.K. Mfg., Ltd. - HONDA, Passenger car  
 SHS - Honda of the U.K. Mfg., Ltd. - HONDA, Multipurpose Passenger Vehicle  
 3HG - Honda de Mexico, S.A. de C.V. - HONDA, Passenger car  
 3CZ - Honda de Mexico, S.A. de C.V. - HONDA, Multipurpose Passenger Vehicle

**YEAR**

A = 2010  
 B = 2011  
 C = 2012  
 D = 2013  
 E = 2014  
 F = 2015  
 G = 2016  
 H = 2017  
 J = 2018  
 K = 2019  
 L = 2020  
 M = 2021  
 N = 2022  
 P = 2023  
 R = 2024  
 S = 2025  
 T = 2026  
 V = 2027  
 W = 2028  
 X = 2029  
 Y = 2030

**PLANT**

C: Sayama, Saitama, Japan  
 X: Yorii, Saitama, Japan  
 S: Suzuka, Mie, Japan  
 T: Takanezawa, Tochigi, Japan  
 A: Marysville, Ohio, USA  
 L: East Liberty, Ohio, USA  
 B: Lincoln, Alabama, USA  
 E: Greensburg, Indiana, USA  
 H: Alliston, Ontario, Canada  
 U: Swindon, Wiltshire, U.K.  
 G: El Salto, Jalisco, Mexico  
 M: Celaya, Gto, Mexico  
 Y: Marysville, Ohio(PMC), USA

02/07/2017

This Page Contains Business Confidential Information

**VEHICLE IDENTIFICATION NUMBER**  
**49CFR PART 565**

2020MY HONDA ODYSSEY Model Codes

MODEL CODE	MAKE	MODEL DESCRIPTION	DRIVE SYSTEM	TRANS-MISSION	BODY TYPE	GVWR CLASS *1	RESTRAINT SYSTEM *2			ENGINE MODEL
							FRONT	MID	REAR	
RL6H2	HONDA	ODYSSEY LX	2WD	10A/T	5DR VAN	E	A	C	B	J35Y7
RL6H5	HONDA	ODYSSEY EX	2WD	10A/T	5DR VAN	E	A	B	B	J35Y7
RL6H7	HONDA	ODYSSEY EXL / EXL-NR	2WD	10A/T	5DR VAN	E	A	B	B	J35Y7
RL6H8	HONDA	ODYSSEY TOURING	2WD	10A/T	5DR VAN	E	A	B	B	J35Y7
RL6H9	HONDA	ODYSSEY ELITE	2WD	10A/T	5DR VAN	E	A	B	B	J35Y7

**\*1 GVWR CLASS**

- A: Less than 3,000 lbs
- B: 3,001 - 4,000 lbs
- C: 4,001 - 5,000 lbs
- D: 5,001 - 6,000 lbs
- E: 6,001 - 7,000 lbs

**\*2 Restraint System**

- A: Seat Belt, Air Bag, Side Air bag , Side Curtain Air Bag and Knee Air Bag (Driver & Passenger)
- B: Seat Belt & Side Curtain Air bag (Mid/Rr outer positions) / Seat Belt (Mid/Rr center position)
- C: Seat Belt & Side Curtain Air bag (Mid/Rr outer positions)

This Page Contains Business Confidential Information

**VEHICLE IDENTIFICATION NUMBER**  
**49CFR PART 565**

2020MY HONDA ODYSSEY Engine Characteristics

No.	Characteristics	Engine Model		
		J35Y7		
1	Manufacturer of the engine	Honda		
2	Primary Fuel type	Gasoline		
3	Secondary Fuel Type	Not Applicable		
4	Engine cylinder configuration (Inline-I, V-Shape, etc.)	V-Shape		
5	Number of cylinders	6		
6	Displacement	3.5(L)		
7	Engine Net brake horsepower	280HP		
8	Electrification Level (Mild Hybrid, Strong Hybrid, Plug-in Hybrid, EV)	Not Applicable		
9	Engine Stroke Cycle (4-stroke, 2-stroked)	4-stroke		
10	Valve train design: SOHC, DOHC, OHV, CVA, etc.	SOHC		
11	Turbo Charged or not	Not Applicable		
12	Cooling Type: (air, water, etc.)	Water		
13	Fuel Delivery/Injection Type (Multipoint Port Injection, Stoichiometric gasoline direct inject(SGDI), etc.)	Direct Fuel Injection		