

**HONDA**

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

September 28, 2018

AHCERT- 180597

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 2019 model year Honda Clarity Electric and Clarity Plug-In Hybrid.

Pursuant to Part 512, Honda has submitted a request to the Chief Counsel's Office that this information be treated as confidential until January 1, 2019.

Respectfully,

AMERICAN HONDA MOTOR CO., INC.

  
John Turley  
Senior Manager  
Product Regulatory Office

JT/rc

Enclosure(s)

September 28, 2018

AHCERT- 180597

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).

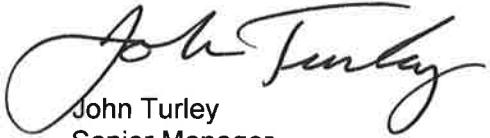
In accordance with 49 CFR section 512.8(d), Honda notes that this confidential information falls with a class that the Chief Counsel has presumptively determined is likely to result in substantial competitive harm if disclosed to the public. Specifically, the submitted information falls within class 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 January 1, 2019.

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

Respectfully,

American Honda Motor Co., Inc.

A handwritten signature in cursive script, appearing to read "John Turley".

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 January 1, 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.

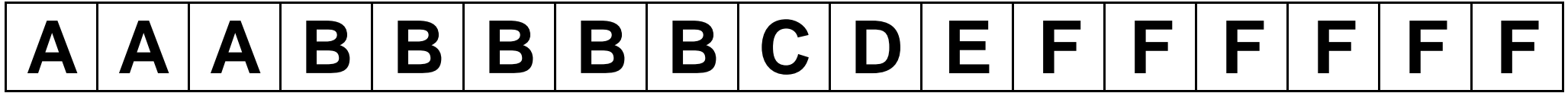
Executed on this the 20<sup>th</sup> day of SEP, 2018.

John Turley



**VEHICLE IDENTIFICATION NUMBER  
49CFR PART 565**

HONDA & ACURA VIN



**MODEL CODE**  
Refer to attached page

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

**SEQUENTIAL PRODUCTION NUMBER**

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

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

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

**VEHICLE IDENTIFICATION NUMBER**

**49CFR PART 565**

2019MY HONDA CLARITY PLUG-IN HYBRID Model Codes

MODEL CODE	MAKE	MODEL DESCRIPTION	DRIVE SYSTEM	TRANS-MISSION	BODY TYPE	GVWR CLASS *1	RESTRAINT SYSTEM *2			ENGINE MODEL
							FRONT	MID	REAR	
ZC5F1	HONDA	CLARITY PLUG-IN HYBRID PHEV	2WD	CVT	4DR Sedan	C	A	-	B	LEB3
ZC5F3	HONDA	CLARITY PLUG-IN HYBRID TOURING	2WD	CVT	4DR Sedan	C	A	-	B	LEB3

**\*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)  
Seat Belt , Air Bag , Side Air Bag , and Side Curtain Air Bag (Passenger)
- B: Seat Belt and Side Curtain Air Bag (Rr outer positions) / Seat Belt (Rr center position)

**VEHICLE IDENTIFICATION NUMBER**

**49CFR PART 565**

2019MY HONDA CLARITY PLUG-IN HYBRID Engine Characteristics

No.	Characteristics	Engine Model		
		LEB3(H4)		
1	Manufacturer of the Engine	HONDA		
2	Primary Fuel Type	Electricity		
3	Secondary Fuel Type	Gasoline		
4	Engine Cylinder Configuration (Inline, V-Shape, etc.)	Inline		
5	Number of Cylinders	4		
6	Displacement	1.5(L)		
7	Engine/Motor Net Brake Horsepower	135kW(Motor) 103HP(Engine)		
8	Electrification Level (Mild Hybrid, Strong Hybrid, Plug-in Hybrid, FCV, BEV)	Plug-in Hybrid		
9	Engine Stroke Cycle (4-stroke, 2-stroke)	4-stroke		
10	Valvetrain Design: SOHC, DOHC, OHV, CVA, etc.	DOHC		
11	Turbocharged 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.) *Representation of the data is based on SAE J1930	Multipoint Port Injection		

**VEHICLE IDENTIFICATION NUMBER**

**49CFR PART 565**

2019MY HONDA CLARITY ELECTRIC Model Codes

MODEL CODE	MAKE	MODEL DESCRIPTION	DRIVE SYSTEM	TRANS-MISSION	BODY TYPE	GVWR CLASS *1	RESTRAINT SYSTEM *2			ENGINE MODEL
							FRONT	MID	REAR	
ZC6F3	HONDA	CLARITY ELECTRIC Touring	2WD	FSS *3	4DR Sedan	C	A	-	B	MCF41

**\*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)  
Seat Belt , Air Bag , Side Air Bag , and Side Curtain Air Bag (Passenger)
- B: Seat Belt and Side Curtain Air Bag (Rr outer positions) / Seat Belt (Rr center position)

**\*3 FSS** Fixed Single Speed Transmission



**VEHICLE IDENTIFICATION NUMBER**

**49CFR PART 565**

2019MY HONDA CLARITY ELECTRIC Engine Characteristics

No.	Characteristics	Engine Model		
		MCF41		
1	Manufacturer of the Engine	HONDA		
2	Primary Fuel Type	Electricity		
3	Secondary Fuel Type	Not Applicable		
4	Engine Cylinder Configuration (Inline, V-Shape, etc.)	Not Applicable		
5	Number of Cylinders	Not Applicable		
6	Displacement	Not Applicable		
7	Engine/Motor Net Brake Horsepower	120[KW](motor)		
8	Electrification Level (Mild Hybrid, Strong Hybrid, Plug-in Hybrid, FCV, BEV)	BEV		
9	Engine Stroke Cycle (4-stroke, 2-stroke)	Not Applicable		
10	Valvetrain Design: SOHC, DOHC, OHV, CVA, etc.	Not Applicable		
11	Turbocharged or not	Not Applicable		
12	Cooling Type: (air, water, etc.)	Water (Cooling Type for Motor)		
13	Fuel Delivery/Injection Type (Multipoint Port Injection, Stoichiometric gasoline direct inject(SGDI), etc.) *Representation of the data is based on SAE J1930	Not Applicable		