



GENERAL MOTORS NORTH AMERICA
Structure & Safety Integration

August 27, 2003

NHTSA
WASHINGTON, DC 20590

AUG 29 P 3 25

Kathleen G. DeMeter, Director
Office of Defects Investigation
NHTSA Enforcement
Room #5326
400 Seventh Street, S.W.
Washington, D.C. 20590

OFFICE OF CHIEF
COUNSEL

GM-834A

NVS-213Cia
EA03-006

Dear Ms. DeMeter:

This letter is General Motors (GM) response to your information request (IR), dated July 2, 2003, regarding allegations of fractured rear axle trailing arms in 1997 - 1999 Chevrolet Venture, Pontiac Transport/Montana, and Oldsmobile Silhouette vehicles manufactured by General Motors.

Your questions and our corresponding replies are as follows:

1. State the number of each of the following items relating to the alleged defect in the subject vehicles and provide Bates numbered hard copies of all documents relating to these items, from all sources, either received or authorized by GM, or of which GM is otherwise aware:
 - a. Owner and fleet reports;
 - b. Field reports, including all reports and requests for technical assistance from dealer personnel and/or zone offices;
 - c. Reports of, or requests for, roadside assistance or recovery;
 - d. Property damage reports, including claims, that do not involve a crash or fire;
 - e. Crash, injury and fatality reports;
 - f. Subrogation claims;
 - g. Third-party arbitration proceedings where GM is a party to the arbitration; and
 - h. Litigation, both pending and closed, in which GM is or was a defendant or codefendant.

For subparts "a" through "e" 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 "e" through "h" provide a summary description of the alleged problem and causal and contributing factors and GM's assessment of the problem, with a summary of the significant underlying facts and evidence. For items f and g, 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.

Product Investigations

Mail Code: 480-108-304 • 30500 Mound Road • Warren, MI 48090-9055

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GM-034A response.doc



Table 1 summarizes the records that could relate to the subject condition. Copies of the documents are provided in response to item 3.

TYPE OF REPORT	COUNT (INCLUDING DUPLICATES)	GM REPORTS	GM REPORTS CORRESPONDING TO NHTSA REPORTS	LOCATION OF REPORTS (ATTACHMENT)	NUMBER OF PROPERTY DAMAGE REPORTS NOT INVOLVING A CRASH	NUMBER OF CRASH INCIDENT REPORTS	NUMBER OF REPORTED INJURIES
Owner Reports	2	2	0	1A	1	0	0
Field Reports and Technical Assistance System Reports	2	2	0	1B	0	0	0
Not-In-Suit Claims	0	0	0	N/A	0	0	0
Subrogation Claims	0	0	0	N/A	0	0	0
Third Party Arbitration Proceedings	0	0	0	N/A	0	0	0
Product Liability Lawsuits	0	0	0	N/A	0	0	0
Total (Including Duplicates)	4	4	0	N/A	1	0	0
Total (Excluding Duplicates)	4	4	0	N/A	1	0	0

TABLE 1

GM has searched the following sources to collect the data for this response. The source and last date the data was gathered are tabulated in Table 1-1.

SOURCE SYSTEM	LAST DATE GATHERED
Corporate Central File	07/25/2003
Customer Assistance Center	07/25/2003
Technical Assistance Center	07/25/2003
Field Information Network Database (FIND)	07/17/2003
24HR Concern Detection Process (CDP)	07/31/2003
Company Vehicle Evaluation Program (CVEP)	07/31/2003
Early Quality Feedback (EQF)	07/16/2003
Legal / Employee Self Insured Services (ESIS)	07/31/2003

TABLE 1-1

2. Separately, for each item (complaint, report, claim, notice, or matter) within the scope of your response to Request No. 1, state the following information:
 - a. GM's file number or other identifier used;
 - b. The category of the item, as identified in Request No. 1 (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 make, 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 2000, or a compatible format, entitled "REQUEST NUMBER TWO DATA." See Enclosure 2, Data Collection Disc, for a pre-formatted table that provides further details regarding this submission.

An electronic summary of the records included in Table 1 is provided on the CD in Attachment 1; refer to the Microsoft Access 2000 file named "REQUEST NUMBER TWO DATA", in the folder labeled Response to Q2. GM has organized the records by the GM file number within each attachment.

3. Produce copies of all documents related to each item within the scope of Request No. 2. Organize the documents separately by category (i.e., consumer complaints, field reports, etc.) and describe the method GM used for organizing the documents.

Copies of the records identified in Item 2 are provided in the attachments listed in Table 1. GM has organized the records by the GM file number within each attachment.

4. State, by model and model year, a total count for all of the following categories of claims, collectively, that have been paid by GM to date, that relate to, or may relate to, the alleged defect in the subject 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:

- a. GM's claim number;
- b. Vehicle owner or fleet name (and fleet contact person) and telephone number; VIN;
- c. Repair date;
- d. Vehicle mileage at time of repair;
- e. Repairing dealer's or facility's name, telephone number, city and state or ZIP code;

- f. Labor operation number;
- g. Problem code;
- h. Replacement part number(s) and description(s);
- i. Concern stated by customer; and
- j. Comment, if any, by dealer/technician relating to claim and/or repair.

Provide this information in Microsoft Access 2000, or a compatible format, entitled "WARRANTY DATA." See Enclosure 2, Data Collection Disc, for a pre-formatted table that provides further details regarding this submission.

The 27 regular warranty claims for the subject vehicles that may be responsive to this request, are summarized below in Table 4 by model and model year. These are warranty claims in addition to those provided in the January 27, 2003 GM response to PE02-086.

The MiC and Universal extended warranty databases are additional databases discovered during the implementation of the TREAD reporting requirements and contain extended warranty claims data that may be responsive to this request. These databases were not searched for GM's response to PE02-086. Therefore, the 26 extended warranty claims summarized in Table 4-1 are the total number of claims that have been filed for the subject vehicles.

Regular Warranty Claims

MODEL	1997 MY	1998 MY	1999 MY
Chevrolet Venture	3	5	5
Pontiac Transport/Montana	2	2	6
Oldsmobile Silhouette	0	2	2

TABLE 4

Extended Warranty Claims

MODEL	1997 MY	1998 MY	1999 MY
Chevrolet Venture	6	3	5
Pontiac Transport/Montana	1	0	3
Oldsmobile Silhouette	1	2	5

TABLE 4-1

GM has searched the GM North America Claim Adjustment Retrieval Database (CARD), the Motors Insurance Corp. - Extended Warranty System and the Universal Warranty Corp. - Extended Warranty System to collect the warranty data for this response. The warranty data was last gathered on August 8, 2003.

A summary of warranty claims that may relate to the subject condition is provided on the CD in Attachment 1; refer to the Microsoft Access 2000 file in the folder labeled "Response for Q4".

GM's warranty database does not contain the following information: vehicle owner's name or telephone number, replacement part number description, or customer concern statement. GM is providing a field labeled "Verbatim Text" in response to request 4j (dealer/technician comment).

The verbatim text is an optional field in the GM warranty system for the dealer to enter any additional comments that may be applicable to the warranty claim. The verbatim text field is not required to be completed for every warranty claim.

The MIC and Universal extended warranty databases do not contain the following information: vehicle owner's name or telephone number, replacement part number or description, problem code, mileage, dealer/technician comment or customer concern statement.

The warranty data provided has limited analytical value in analyzing the field performance of a motor vehicle component. The warranty records do not contain sufficient information to establish the condition of the part at the time of the warranty correction; and service personnel may not consistently use the appropriate labor and trouble codes. Warranty numbers represent claims by our dealers for reimbursement for parts and labor costs incurred in performing warranty service for our customers.

5. Describe in detail the search criteria used by GM to identify the claims identified in response to Request No. 4, 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 GM 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) related to the alleged defect that GM 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.

The warranty data was collected by searching for the following labor code and trouble codes.

Labor code and description:

E5700 - Axle Assembly, Rear Replace

Trouble codes and descriptions:

1A	Bent
1D	Broken
1K	Cracked
3F	Not Connected
4R	Weld Broken
6C	Component Inoperative
1B	Casting Defect
3X	Registers Incorrectly
4Q	Weak

The GM Warranty Database does not contain a labor code for replacement of the rear trailing arm. The labor code E5700 is for replacement of the entire rear axle assembly. There may be some warranty claims included in the warranty claims data for replacement of the rear axle for reasons other than fracture of the rear trailing arm.

The warranty data provided has limited analytical value in analyzing the field performance of a motor vehicle component. The warranty records do not contain sufficient information to establish the condition of the part at the time of the warranty correction; and service personnel may not

consistently use the appropriate labor and trouble codes. Warranty numbers represent claims by our dealers for reimbursement for parts and labor costs incurred in performing warranty service for our customers.

The subject vehicles are covered by a bumper-to-bumper new vehicle warranty for three years or 36,000 miles whichever occurs first. Many different extended warranty options are available through GM dealerships. They are offered at different prices and for varying lengths of time, based on customer's preference, up to 7 years from the date of purchase or up to a total of 100,000 vehicle miles. The General Motor's warranty system does not contain information on the number of vehicles that have extended warranty coverage.

6. Produce copies of all service, warranty, and other documents that relate to, or may relate to, the alleged defect in the subject vehicles, that GM has issued to any dealers, regional or zone offices, field offices, fleet purchasers, or other entities. This includes, but is not limited to, technical service bulletins, service campaigns, 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 GM is planning to issue within the next 120 days.

GM has not identified any service bulletins, advisories, or other communications to dealers, zone offices, or field offices that pertain to the alleged defect in the subject vehicles.

General Motors has not issued and is not planning to issue in the next 120 days, any service, warranty or other technical documents or communications to its dealers, regional offices, zone offices or other entities regarding the alleged defect.

7. Other than those identified in GM's January 27, 2003 response to NHTSA's information request in PE02-086, 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, GM. 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.

On May 29, 2003, GM Engineering initiated a Warranty Parts Return Program to run until October 1, 2003. GM Engineering conducted inspections and analyses of rear axle warranty return parts. This is the only "action" taken by GM other than those identified in our January 27, 2003 response to PE02-086.

The objective of the parts return program was to obtain rear axle trailing arms that have been removed/replaced by GM dealers for analysis by engineering. There were 10 rear axle trailing arms returned to the Warranty Parts Center. Attachment 7A contains a summary spreadsheet and copies of the available repair orders, for the axles that were returned. There was no apparent damage to the trailing arm on 6 of the axles examined. The other 4 axles were sent to the GMNA Materials Laboratory for further analysis.

Attachment 7B contains the GMNA Materials Laboratory evaluation reports for axles 1 & 10 as numbered on the summary spreadsheet. These evaluation reports include the objective of analysis, dates of evaluation, procedure/method and conclusions. The analysis of axles 7 & 8 has not yet been completed.

6. Describe all modifications or changes made by, or on behalf of, GM in the design, material composition, manufacture, quality control or installation of the subject component, from the start of production to date, which relate to, or may 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 numbers (service and engineering) of the original component;
 - e. The part number (service and engineering) of the modified component, if any;
 - 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 of which GM is aware that may be incorporated into vehicle production within the next 120 days.

General Motors has not made any modifications or changes in the design, material composition, manufacture, quality control or installation of the subject component other than those identified in the GM's January 27, 2003 response to PEG2-086. General Motors is not planning to incorporate any modifications or changes into vehicle production within the next 120 days.

8. Provide the following information concerning the change in design of the rear axle trailing arm from the Lumina APV/Oldsmobile Silhouette ("APV") solid blade design to the current U-van design:
- a. The "APV" trailing arms did not include horizontally punched holes. Based on ODI's consumer information and GM's previously supplied failure data, the subject component failure always occurs forward of the axle through one of the horizontally punched holes located in the trailing arm. State the reason(s) for the change to the current rear axle trailing arm design and provide GM's assessment of the contribution of the change to the potential for the alleged defect condition to occur.

The "APV" (model years prior to 1997) trailing arms did include horizontally punched holes. The 1997 - 1999 model year U van rear trailing arm design was optimized for performance and mass by incorporating horizontally punched holes. As compared to the "APV" trailing arm performance, the holes in the 1997 - 1999 model year U van trailing arms do not increase the potential for the alleged defect to occur.

- b. Describe the differences between the previous "APV" design and the current U-van design. Include the following information in the description: (1) material specifications, (2) component dimensions, (3) description of the manufacturing processes, and (4) material handling.

The material specifications for the "APV" (model years prior to 1997) trailing arm and the current U van are contained in the "General" section of the GM Engineering Standards Materials and Processes manual and the "Metals" section of the GM Engineering Standards manual (see Attachment 9A). The component dimensions for the "APV" are on Engineering drawing 10202100 - Arm - Rear Control, Attachment 9B. The component dimensions for the current U van trailing arm are on Engineering drawing 10236174 - Arm RR Suspension, Attachment 9C. A description of the manufacturing process for the "APV" trailing arm is contained in Attachment 9D, Product Assembly Documents. A description of the manufacturing process for the current U van trailing arm is contained in Attachment 9E, Product Assembly Documents.

Material handling of the "APV" (model years prior to 1997) rear axle assembly utilized vertically placed parts in a metal container. The subject vehicles (model years 1997 through 1999) material handling utilized horizontally placed axles in a vacuum formed plastic container. The current U van (model years 2000 to current) utilizes modified vacuum formed plastic containers. These containers have steel plates installed above the forklift pockets on the vacuum formed plastic containers and the entire area is painted white. The steel plates were installed to help prevent forklifts from piercing the vacuum formed plastic containers. The fork pocket was painted white to improve visibility of the fork pocket. The lighting was improved in the area where the supplier loads the rear axles into rail cars and the area in the assembly plant where the rear axles are unloaded.

- c. Describe and provide the results of any curb impact studies GM performed on the L-Series APV/Oldsmobile Silhouette vehicles.

General Motors has not discovered any reports of curb impact studies performed on the rear axle assembly on the "APV" (model years prior to 1997).

- d. State the impact speeds required to plastically deform an "APV" rear axle blade and a subject vehicle.

Lateral curb impact test results applicable to the subject vehicles show no evidence that the rear trailing arms were deformed after the test, which is run at 9 mph per GM standards. Attachment 9F contains test report 7UTK2-174 and test incident reports CE-97U-04A-0001TL, CE-97U-04A-0002TL, and CE-97U-04D-0016TL. There was no failure of the trailing arm as a result of the test. The test incident reports were written on other axle components. As stated in the response to 9(c), GM has not discovered any reports of curb impact studies performed on "APV" (model years prior to 1997) rear axle assemblies.

10. Provide copies of all engineering standards, specification, design guides and equivalent documents relating to the subject components. In addition, provide copies of all

engineering drawings and related specification information for any prior, current, new, or proposed rear axle trailing arm, incorporated in the subject vehicles, that GM has produced, developed or is planning to develop. Please ensure this information includes any changes in material specifications for the rear axle trailing arm.

The engineering standards, specifications and drawings responsive to this request have been provided in the attachments included in the response to Item No 9.

11. State the number of each of the following that GM has sold that may be used in the subject vehicles by component name, part number (both service and engineering/production), model and model year of the vehicle in which it is used and month/year of sale (including the cut-off date for sales, if applicable):
- a. Rear axle trailing arms; and
 - b. Rear axle assemblies; and
 - c. Any kits that have been released, or developed, by GM for use in service repairs to the subject component/assembly.

For each of the subject components, please provide the part number with respect to each subject vehicle and identify what other GM vehicles, if any, to which the components will fit or for which the components were specified.

For each component part number, provide the supplier's name, address, and appropriate point of contact (name, title, and telephone number) Also identify by make, model and model year, any other vehicles of which GM is aware that contain the identical component, whether installed in production or in service, and state the applicable dates of production or service usage.

An electronic summary table of the requested service part information is provided on the CD in Attachment 1; refer to the Microsoft Excel file in the folder labeled "Response for Q11." This table contains service part numbers, part description, part usage information, part sales figures by month and calendar year and the supplier's name and address, contact name and phone number. The General Motors Service Parts System does not contain a title of a contact person for each component and is therefore unable to provide this information.

12. In its January 27, 2003 response to PE02-086, GM provided information regarding a study entitled "GMT200 Rear Axle Trailing Arm Investigation." The study identified the root cause of trailing arm failures as "Mishandling of parts prior to assembly." Provide the following additional information regarding GM's rear trailing arm study and the occurrence of damage to rear axle trailing arms in subject vehicles during the assembly process:

The information regarding the "GMT200 Rear Axle Trailing Arm Investigation" and the supporting documentation was provided in the January 27, 2003 response to PE02-086. GM has not discovered additional information regarding the "GMT200 Rear Axle Trailing Arm Investigation" or the occurrence of damage to rear axle trailing arms in the subject vehicles during the assembly process:

- a. State the total number of rear axle assemblies that were removed from the assembly process prior to installation due to damaged trailing arms. Provide this information by plant and month of production.

GM does not have a count of the total number of rear axle assemblies that were removed from the assembly process prior to installation due to damage to the trailing arms. Axle assemblies are sometimes identified as discrepant by the production operator and returned to the supplier prior to vehicle assembly. GM does not keep records as to the specific discrepancies. Shipping records, only available from January 2003, show the number of axle assemblies returned to the supplier as follows:

January 2003	12 axle assemblies returned
February 2003	18 axle assemblies returned
March 2003	36 axle assemblies returned
April 2003	no axles returned
May 2003	no axles returned
June 2003	06 axle assemblies returned

- b. State the total number of rear axle assemblies with damaged rear trailing arms that were detected after assembly onto a subject vehicle but before delivery to a consumer. Provide this information by plant, month of production, and VIN.

If damaged rear trailing arm assemblies were detected after shipment from the assembly plant and before delivery to a consumer, they would have been repaired by a GM dealer. The repair is done under the labor code for "rear axle replace", therefore, the GM warranty database does not identify the total number of rear axle assemblies with damaged trailing arms.

- c. State the total number of rear axle assemblies with damaged rear trailing arms that have been identified by GM after delivery to a consumer. Provide this information by plant, month of production, VIN, and GM's assessment of the cause of the damage.

If damaged rear trailing arm assemblies were detected after delivery to a consumer, they would have been repaired by a GM dealer. The warranty claims data provided in our January 27, 2003 response to PE02-066 includes information regarding the total number of warranty claims for replacement of the rear axle assembly. The warranty claims data provided in the January 27, 2003 response includes claims for replacement of the rear axle due to fracture of the trailing arm and also claims for reasons other than fracture of the rear trailing arm. In its investigation and through the analysis of returned parts, GM identified 48 rear axle assemblies that appeared to have trailing arm fractures caused by mishandling.

- d. State what GM has done with the rear axle assemblies with damaged rear trailing arms detected at the assembly plant.

Damaged rear axle assemblies detected at the assembly plant are returned to the supplier. The damaged axles are cut in half and scrapped by the supplier.

- e. State whether any of the parts that were identified as excessively damaged were fixed and placed back into the assembly process.

The assembly plant does not have the capability to repair damaged axles. The axles identified as damaged in the assembly plant are returned to the supplier and scrapped.

- f. Describe in detail the results of the long-term corrective actions that have been implemented based on the findings of GM's Rear Axle Trailing Arm Investigation in the subject vehicles including, but not limited to, the use of new container designs, material handling processes and shipping procedure changes.

The following "long-term corrective actions" were implemented between January 1999 and September 1999.

- a. Assembly operator training in identifying discrepant axle assemblies.
- b. Steel plates installed above the fork pockets.
- c. The entire fork pocket area painted white.
- d. Longer forks (60 inches).
- e. Larger fork trucks (10,000 lbs.) used to unload rail cars.
- f. Fork truck operator training.
- g. Increased lighting in loading and unloading areas.

These container designs, material handling processes and shipping procedures are currently being utilized in the supplier manufacturing plant and the vehicle assembly plant. The assembly plant has not discovered damage to shipping containers that could indicate damage to the trailing arm. On later model year vehicles built after September 1999, GM has not identified any trailing arm failures caused by mishandling before assembly.

- g. Identify the following production ranges associated with potential assembly plant damage to rear trailing arms in the subject vehicles: (1) the period before GM identified the potential for assembly plant damage; (2) the periods from when GM identified the potential for trailing arm damage at the assembly to implementation of each countermeasure developed to address the issue; and (3) all production subsequent to the implementation of the final countermeasure. Regarding item (2), provide a chronology of all such process changes and state the approximate number of vehicles produced with each manufacturing process and the numbers of damaged units detected in vehicles produced in each range (see 12.a through 12.c).

- (1) The production range for the subject vehicles for the period before GM identified the potential for assembly plant damage is September 1996 through April 1998.
- (2) The production range for the subject vehicles for the period from when GM identified the potential for trailing arm damage at the assembly plant to implementation of the corrective actions is April 1998 through August 1999 (production of the "subject vehicles" ended June 30, 1999).
- (3) The production range for all production subsequent to the implementation of the corrective actions is September 1999 to the present. There are no "subject vehicles" included in this production range.

The corrective actions that were implemented based on GM's Rear Axle Trailing Arm Investigation were implemented between January 1999 and September 1999. GM has not discovered information indicating the chronology of each process change other than the implementation period of January 1999 to September 1999.

13. Provide copies of all communications between GM and all suppliers of the subject components that relate in any way to the alleged defect condition.

Attachment 13 contains copies of communications between GM and the supplier of the subject component that may relate to the alleged defect in addition to the communications provided in GM's January 27, 2003 response to PE02-066.

* * *

General Motors requests that the document stamped "GM Confidential" included in Attachment 9F afforded confidential treatment by the NHTSA. This information is not customarily made public by General Motors and contains trade secrets and commercial information which is privileged or confidential under 5 U.S.C. Section 552(b)(4), 49 CFR Part 512 and 49 U.S.C. Section 30167(a).

Attachments 9B and 9C contain engineering drawings that are identified as documents #10202100 and #10239174. These drawings have commercial value that can only be obtained independently at considerable cost. This information can be used by competitors to identify quality and performance problems or differences, thereby enabling them to improve their own products, without the expenditures associated with the evaluation of products, all at the expense of General Motors. Attachments 9B and 9C contain commercial information the disclosure of which would likely result in substantial competitive harm.

General Motors treats the above material as confidential proprietary information available only to authorized General Motors personnel and not otherwise available to the public. The documents are maintained under a record-keeping system which is intended to control dissemination of this material within General Motors, and to assure that it is not disseminated outside the Corporation, except as described in the attached certification made pursuant to 49 CFR Part 512.4(e).

To the best of our knowledge, no prior determinations of the confidentiality of this document has been made by the NHTSA, other Federal Agencies, or the Federal Courts. Document such as the one contained in Attachments 9F, however, have, to the best of our knowledge, normally been granted confidential treatment by the NHTSA in the past. The drawings in Attachments 9B and 9C are of a type for which a class determination of confidentiality has been made under 49 CFR Part 512, Appendix B.

The document subject to this request for confidentiality has been clearly stamped "GM CONFIDENTIAL". If a request for disclosure of any or all of this information is received by the NHTSA, General Motors requests notification of receipt of each such request and, if necessary, an opportunity to further explain the reasons why such material is trade secret and commercial information which should not be disclosed under the applicable statutes and regulations.

This response is based on searches of General Motors Corporation (GM) locations where documents determined to be responsive to your request would ordinarily be found. As a result, the scope of this search did not include, nor could it reasonably include, "all of its divisions, subsidiaries (whether or not incorporated) and affiliated enterprises and all of their 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 GM (including all business units and persons previously referred to), who are or, in or after January 1, 1996, were involved in any way with any of the following related to the alleged defect in the subject vehicles:

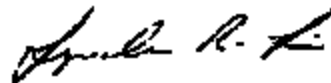
- a. Design, engineering, analysis, modification or production (e.g. quality control);
- b. Testing, assessment or evaluation

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

This response was compiled and prepared by this office upon review of the documents produced by various GM locations, and does not include documents generated or received at those GM locations subsequent to their searches.

Please contact me if you require further information about this response or the nature or scope of our searches.

Sincerely,



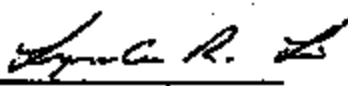
Lyndon R. Lie
Director Product Investigations

Attachments

CERTIFICATE IN SUPPORT OF REQUEST FOR CONFIDENTIALITY

I, Lyndon R. Lie, pursuant to the provisions of 49 CFR Part 512 state as follows:

- (1) I am the Director of Product Investigations, and I am authorized by General Motors Corporation (GM) to execute documents on its behalf;
- (2) The information stamped "GM Confidential" contained in Attachments 9B, 9C and 9F to this document is confidential and proprietary data and is being submitted with the claim that it is entitled to confidential treatment of 5 USC §552(b)(4), 49 U.S.C. Section 30167(a) and implemented in 49 CFR Part 512;
- (3) I, or members of my staff, have personally inquired of the responsible GM personnel 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 GM;
- (4) Based upon such inquiries to the best of my knowledge, information and belief, the information for which GM has claimed confidential treatment has never been released or become available outside GM, except as hereinafter specified: None.
- (5) I make no representations beyond those contained in this certificate and in particular, I make no representations as to whether this information may become available outside GM because of unauthorized or inadvertent disclosure except as stated in Paragraph 4; and,
- (6) I certify under penalty of perjury that the foregoing is true and correct. Executed on this the 27th day of August 2003.



Lyndon R. Lie
Director
Product Investigations