

NUS-213
S. Yon

W/ - 9 2006

Gay P. Kent
Director, Product Investigations
General Motors North America
Mail Code 480-111-E18
30200 Mound Road
Warren, MI 48090-9010

Re: Confidentiality Determination/EA04-034 (Ford Crown Victoria Police
Interceptor wheel cracks – peer data)

Dear Ms. Kent:

This responds to your May 3, 2006 letter requesting confidential treatment for information provided by General Motors North America (GM) in response to an agency information request involving alleged wheel cracks occurring in model year (MY) 2003-2005 Ford Crown Victoria Police Interceptor vehicles. The information was provided on a single CD-ROM (Confidential Attachment 1) containing a file identified by GM as confidential – "part drawing 9595647.pdf". The file consists of engineering drawings and specifications of the wheel used on the Chevrolet Impala 9C1 Police Package. You request that to the extent that the agency grants GM's request, that NHTSA not apply any time limits to this protection, which I am construing as a request for confidentiality on an indefinite basis.

Your letter indicates that the submitted information is considered confidential and proprietary and that it is not released to the public. You contend that the information, if disclosed, would be likely to cause GM to suffer substantial competitive harm because the information would reveal competitively sensitive engineering information that involved significant time, development effort, and money to plan and execute, its disclosure would permit a competitor to obtain this information without committing similar resources and effort.

I have decided to grant your request.

The information provided was requested pursuant to 49 U.S.C. § 30166, which authorizes the agency to conduct investigations and require manufacturers to submit reports. Therefore, because the information was not submitted voluntarily, I have examined your submission using the competitive harm standard set forth in *National Parks & Conservation Ass'n v. Morton*, 498 F.2d 765 (D.C. Cir. 1974).

I have reviewed your submission, including the materials that you claim are entitled to confidential treatment and the arguments that you assert in support of your claim. As described above, the submitted materials consist of engineering specifications for a wheel. I have concluded that the public release of this information is likely to cause substantial competitive harm to GM and, therefore, that this information is entitled to confidential treatment pursuant to Exemption 4 of the Freedom of Information Act, 5 U.S.C. § 552(b)(4). Accordingly, the information contained in the file "part drawing 9595647.pdf" will be withheld for an indefinite period of time.

Subject to the conditions below, this grant of confidential treatment will remain in effect on an indefinite basis.

This grant of confidential treatment is subject to certain conditions. The information may be disclosed under 49 CFR § 512.22 based upon newly discovered or changed facts, and you must inform the agency of any changed circumstances that may affect the protection of the information (49 CFR § 512.10). If necessary, you will be notified prior to the release of any information under the procedures established by our regulations (49 CFR § 512.22(b)).

Sincerely,



Otto G. Matheke, III
Senior Attorney

NHTSA:NCC-113:Kido:pl:61834:05/08/06
NCC-113:Subj/Chron NCC06-002715
cc: NVS-213: S. Yon
confidentiality\misc06\GM 06-002715.mk.doc



U.S. Department
of Transportation
National Highway
Traffic Safety
Administration

MAR 28 2006

2006 MAR -4 10 31 15

COUNSEL

400 Seventh Street, S.W.
Washington, D.C. 20590

GM 687

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Ms. Gay P. Kent, Director
Product Investigations
General Motors Corporation
30200 Mound Road - Mail Code 480-111-E18
Warren, MI 48090-9010

NVS-213dsy
EA04-034

Dear Ms. Kent:

The Office of Defects Investigation (ODI) of the National Highway Traffic Safety Administration (NHTSA) is conducting an investigation (EA04-034) of alleged steel wheel fracture in certain model year 2003 - 2005 Ford Crown Victoria Police Interceptor vehicles manufactured by Ford Motor Company. For a comparative assessment, we are requesting information concerning certain GM police specification (package) vehicles equipped with steel wheels (peer vehicles).

Unless otherwise stated in the text, the following definitions apply to these information requests:

- **Subject peer vehicles:** all model year 2003 - 2005 Impala police specification vehicles manufactured with steel wheels and sold in the U.S. for use by police agencies.
- **Subject component:** the steel wheel(s) specified for use as original equipment on the subject peer vehicles.
- **Subject condition:** cracking or fracture of the subject component, including but not limited to, cracking that can lead to a loss of air pressure from the tire.
- **GM:** General Motors Corporation, all of its past and present officers and employees, whether assigned to its principal offices or any of its field or other locations, including 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



DOT AUTO SAFETY HOTLINE
888-DASH-2-DOT
888-327-4236

2000, were involved in any way with any of the following related to the subject condition in the subject peer 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
 - 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.
- **Document:** "Document(s)" is used in the broadest sense of the word and shall mean all original written, printed, typed, recorded, or graphic matter whatsoever, however produced or reproduced, of every kind, nature, and description, and all non-identical copies of both sides thereof, including, but not limited to, papers, letters, memoranda, correspondence, communications, electronic mail (e-mail) messages (existing in hard copy and/or in electronic storage), faxes, mailgrams, telegrams, cables, telex messages, notes, annotations, working papers, drafts, minutes, records, audio and video recordings, data, databases, other information bases, summaries, charts, tables, graphics, other visual displays, photographs, statements, interviews, opinions, reports, newspaper articles, studies, analyses, evaluations, interpretations, contracts, agreements, jottings, agendas, bulletins, notices, announcements, instructions, blueprints, drawings, as-builts, changes, manuals, publications, work schedules, journals, statistical data, desk, portable and computer calendars, appointment books, diaries, travel reports, lists, tabulations, computer printouts, data processing program libraries, data processing inputs and outputs, microfilms, microfiches, statements for services, resolutions, financial statements, governmental records, business records, personnel records, work orders, pleadings, discovery in any form, affidavits, motions, responses to discovery, all transcripts, administrative filings and all mechanical, magnetic, photographic and electronic records or recordings of any kind, including any storage media associated with computers, including, but not limited to, information on hard drives, floppy disks, backup tapes, and zip drives, electronic communications, including but not limited to, the Internet and shall include any drafts or revisions pertaining to any of the foregoing, all other things similar to any of the foregoing, however denominated by GM, any other data compilations from which information can be obtained, translated if necessary, into a usable form and any other documents. For purposes of this request, any document which contains any note, comment, addition, deletion, insertion, annotation, or otherwise comprises a non-identical copy of another document shall be treated as a separate document subject to production. In all cases where original and any non-identical copies are not available, "document(s)" also means any identical copies of the original and all non-identical copies thereof. Any document, record, graph, chart, film or photograph originally produced in color must be provided in color. Furnish all documents whether verified by GM or not. If a document is not in the English language, provide both the original document and an English translation of the document.

- **Other Terms:** To the extent that they are used in these information requests, the terms "claim," "consumer complaint," "dealer field report," "field report," "fire," "fleet," "good will," "make," "model," "model year," "notice," "property damage," "property damage claim," "rollover," "type," "warranty," "warranty adjustment," and "warranty claim," whether used in singular or in plural form, have the same meaning as found in 49 CFR 579.4.

In order for my staff to evaluate the subject condition, certain information is required. Pursuant to 49 U.S.C. § 30166, please provide numbered responses to the following information requests. Insofar as GM has previously provided a document to ODI, GM may produce it again or identify the document, the document submission to ODI in which it was included and the precise location in that submission where the document is located. When documents are produced, the documents shall be produced in an identified, organized manner that corresponds with the organization of this information request letter (including all individual requests and subparts). When documents are produced and the documents would not, standing alone, be self-explanatory, the production of documents shall be supplemented and accompanied by explanation.

Please repeat the applicable request verbatim above each response. After GM's response to each request, identify the source of the information and indicate the last date the information was gathered.

1. State, by model and model year, the number of subject peer vehicles GM has manufactured for sale or lease in the United States. Separately, for each subject peer vehicle manufactured to date by GM, state the following:
 - a. Vehicle identification number (VIN);
 - b. Date of manufacture;
 - c. Date warranty coverage commenced; and
 - d. The State in the United States where the vehicle was originally sold or leased (or delivered for sale or lease).

Provide the table in Microsoft Access 2000, or a compatible format, entitled "PRODUCTION DATA." See Enclosure 1, EA04-034 Peer IR Response, for a pre-formatted table which provides further details regarding this submission.

2. State the number of each of the following, received by GM, or of which GM is otherwise aware, which relate to, or may relate to, the subject condition in the subject 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, based on claims against the manufacturer involving a death or injury, notices received by the manufacturer alleging or proving that a death or injury was caused by a possible defect in a subject peer vehicle, property damage claims, consumer complaints, or field reports;
 - d. Property damage claims;
 - e. Third-party arbitration proceedings where GM is or was a party to the arbitration; and
 - f. Lawsuits, both pending and closed, in which GM is or was a defendant or codefendant.

For subparts "a" through "d," 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 GM'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.

3. Separately, for each item (complaint, report, claim, notice, or matter) within the scope of your response to Request No. 2, state the following information:
 - a. GM's file number or other identifier used;
 - b. The category of the item, as identified in Request No. 2 (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 1, EA04-034 Peer IR Response, for a pre-formatted table which provides further details regarding this submission.

4. 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.
5. 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 subject condition in the subject 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:

- a. GM's claim number;

- b. Vehicle owner or fleet name (and fleet contact person) and telephone number;
- c. VIN;
- d. Repair date;
- e. Vehicle mileage at time of repair;
- f. Repairing dealer's or facility's name, telephone number, city and state or ZIP code;
- g. Labor operation number;
- h. Problem code;
- i. Replacement part number(s) and description(s);
- j. Concern stated by customer; and
- k. 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 1, EA04-034 Peer IR Response, for a pre-formatted table which provides further details regarding this submission.

6. Describe in detail the search criteria used by GM to identify the claims identified in response to Request No. 5, 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 subject condition in the subject peer vehicles. State, by make and model year, the terms of the new vehicle warranty coverage offered by GM on the subject peer 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 GM offered for the subject peer vehicles and state by option, model, and model year, the number of vehicles that are covered under each such extended warranty.
7. State the number of subject components that GM has sold that may be used in the subject peer 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*). 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.
8. Provide an engineering drawing for each subject component part number identified in Request No. 7.

This letter is being sent to GM pursuant to 49 U.S.C. § 30166, which authorizes NHTSA to conduct any investigation that may be necessary to enforce Chapter 301 of Title 49 and to request reports and the production of things. It constitutes a new request for information. GM's failure to respond promptly and fully to this letter could subject GM to civil penalties pursuant to 49 U.S.C. § 30165 or lead to an action for injunctive relief pursuant to 49 U.S.C. § 30163. (Other remedies and sanctions are available as well.) Please note that maximum civil penalties under 49 U.S.C. § 30165 have increased as a result of the recent enactment of the Transportation Recall Enhancement, Accountability, and Documentation (TREAD) Act, Public Law No. 106-

414 (signed November 1, 2000). Section 5(a) of the TREAD Act, codified at 49 U.S.C. § 30165(b), provides for civil penalties of up to \$5,000 per day, with a maximum of \$16,050,000 for a related series of violations, for failing or refusing to perform an act required under 49 U.S.C. § 30166. See 49 CFR 578.6 (as amended by 69 Fed. Reg. 57864 (Sept. 28, 2004)). This includes failing to respond to ODI information requests.

If GM cannot respond to any specific request or subpart(s) thereof, please state the reason why it is unable to do so. If on the basis of attorney-client, attorney work product, or other privilege, GM does not submit one or more requested documents or items of information in response to this information request, GM must provide a privilege log identifying each document or item withheld, and stating the date, subject or title, the name and position of the person(s) from, and the person(s) to whom it was sent, and the name and position of any other recipient (to include all carbon copies or blind carbon copies), the nature of that information or material, and the basis for the claim of privilege and why that privilege applies.

GM's response to this letter, in duplicate, together with a copy of any confidentiality request, must be submitted to this office by May 12, 2006. Please refer to EA04-034 in GM's response to this letter. If GM finds that it is unable to provide all of the information requested within the time allotted, GM must request an extension from Mr. Jeffrey Quandt at (202) 366-5207 no later than five business days before the response due date. If GM is unable to provide all of the information requested by the original deadline, it must submit a partial response by the original deadline with whatever information GM then has available, even if an extension has been granted.

If GM claims that any of the information or documents provided in response to this information request constitute confidential commercial material within the meaning of 5 U.S.C. § 552(b)(4), or are protected from disclosure pursuant to 18 U.S.C. § 1905, GM must submit supporting information together with the materials that are the subject of the confidentiality request, in accordance with 49 CFR Part 512, as amended (69 Fed. Reg. 21409 et seq; April 21, 2004), to the Office of Chief Counsel (NCC-113), National Highway Traffic Safety Administration, Room 5219, 400 Seventh Street, S.W., Washington, D.C. 20590. GM is required to submit two copies of the documents containing allegedly confidential information (except only one copy of blueprints) and one copy of the documents from which information claimed to be confidential has been deleted.

7
If you have any technical questions concerning this matter, please call Scott Yon of my staff at (202) 366-0139.

Sincerely,



Kathleen C. DeMeter, Director
Office of Defects Investigation
Enforcement

Enclosure 1, One CD ROM titled Data Collection Disc containing three files.

May 3, 2006

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

GM-687

NVS-213dsy
EA04-034

Dear Ms. DeMeter:

This letter is General Motors' (GM) response to your information request (IR), dated March 28, 2006, concerning an ongoing NHTSA investigation of alleged steel wheel fracture in certain model year (MY) 2003 through 2005 Ford Crown Victoria Police Interceptor vehicles manufactured by Ford Motor Company. The GM subject peer vehicles for which information is requested are MY 2003 through 2005 Chevrolet Impala (9C1 Police Package) vehicles.

Your questions and our corresponding replies are as follows:

1. State, by model and model year, the number of subject peer vehicles GM has manufactured for sale or lease in the United States. Separately, for each subject peer vehicle manufactured to date by GM, state the following:
 - a. Vehicle identification number (VIN);
 - b. Date of manufacture;
 - c. Date warranty coverage commenced; and
 - d. The State in the United States where the vehicle was originally sold or leased (or delivered for sale or lease).

Provide the table in Microsoft Access 2000, or a compatible format, entitled "PRODUCTION DATA." See Enclosure 1, EA04-034 Peer IR Response, for a preformatted table which provides further details regarding this submission.

GM is providing the number of subject peer vehicles produced for sale or lease in the United States by model and model year in Table 1 below.

MAKE/ MODEL	2003MY	2004MY	2005MY	TOTAL
Chevrolet Impala (9C1 Police Package)	6,618	7,901	10,589	25,108

TABLE 1 VEHICLE PRODUCTION

The production information requested in 1a-d is provided on the Attachment 1 CD, in the folder labeled: "Response for Q1;" refer to the Microsoft Access 2000 file labeled PRODUCTION DATA. GM is providing the state where the vehicle was shipped in response to request 1d. For some of the subject vehicles, which have incomplete warranty files, the GM warranty system does not contain a warranty start date or state where the vehicle was shipped, and therefore these fields are blank in the Microsoft Access 2000 file.

2. State the number of each of the following, received by GM, or of which GM is otherwise aware, which relate to, or may relate to, the subject condition in the subject 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, based on claims against the manufacturer involving a death or injury, notices received by the manufacturer alleging or proving that a death or injury was caused by a possible defect in a subject peer vehicle, property damage claims, consumer complaints, or field reports;
- d. Property damage claims;
- e. Third-party arbitration proceedings where GM is or was a party to the arbitration; and
- f. Lawsuits, both pending and closed, in which GM is or was a defendant or codefendant.

For subparts "a" through "d," 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 GM'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.

As indicated in Table 2-1 below, GM did not identify any records that could relate to the subject condition in the subject peer vehicles.

TYPE OF REPORT	GM REPORTS	SUBCATEGORIES				
		CORRESPONDING TO NHTSA REPORTS	NUMBER WITH PROPERTY DAMAGE	NUMBER WITH CRASH	NUMBER WITH INJURIES/FATALITIES*	NUMBER WITH FINES*
Owner Reports	0	0	0	0	0	0
Field Reports	0	0	0	0	0	0
Not-in-Suit Claims	0	0	0	0	0	0
Subrogation Claims	0	0	0	0	0	0
Third Party Arbitration Proceedings	0	0	0	0	0	0
Product Liability Lawsuits	0	0	0	0	0	0
Total Reports (Including Duplicates)	0	0	0	0	0	0
Total Vehicles with Reports (Unique VIN)	0	0	0	0	0	0

TABLE 2-1: REPORT BREAKDOWN
 * GM HAS NO FATALITY REPORTS

The sources of the requested information and the last date the searches were conducted are tabulated in Table 2-2 below.

SOURCE SYSTEM	LAST DATE GATHERED
Corporate Central File	04/04/2008
Customer Assistance Center	04/04/2008
Technical Assistance Center	04/10/2008
Field Information Network Database (FIND)	04/06/2008
Company Vehicle Evaluation Program (CVEP)	04/06/2008
Field Product Report Database (FPRD)	04/06/2008
Legal / Employee Self Insured Services (ESIS)	04/03/2008

TABLE 2-2: DATA SOURCES

3. Separately, for each item (complaint, report, claim, notice, or matter) within the scope of your response to Request No. 2, state the following information:
 - a. GM's file number or other identifier used;
 - b. The category of the item, as identified in Request No. 2 (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 1, EA04-034 Peer IR Response, for a pre-formatted table which provides further details regarding this submission.

GM has not identified any records responsive to Request No. 2.

4. 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.

GM has not identified any documents responsive to Request No. 2.

5. 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 subject condition in the subject 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:

- a. GM's claim number;
- b. Vehicle owner or fleet name (and fleet contact person) and telephone number;
- c. VIN;
- d. Repair date;
- e. Vehicle mileage at time of repair;
- f. Repairing dealer's or facility's name, telephone number, city and state or ZIP code;
- g. Labor operation number;
- h. Problem code;
- i. Replacement part number(s) and description(s);
- j. Concern stated by customer; and
- k. 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 1, EA04-034 Peer IR Response, for a pre-formatted table which provides further details regarding this submission.

As indicated in Table 5-1 below, GM did not identify any regular or extended warranty claims for the subject vehicles that may be responsive to this request.

MAKE/MODEL	2003 MY	2004 MY	2005 MY	TOTAL
Chevrolet Impala (9C1 Police Package)	0	0	0	0

TABLE 5-1 REGULAR AND EXTENDED WARRANTY CLAIMS

GM searched the GM North America Claim Adjustment Retrieval Database (CARD-regular warranty), the Motors Insurance Corporation (MIC - extended warranty), and the Universal Warranty Corporation (UWC - extended warranty) databases to collect the warranty data for this response. The sources of the warranty data and the last date the searches were conducted are tabulated in Table 5-2 below.

SOURCE SYSTEM	LAST DATE GATHERED
GM CARD -regular warranty	04/04/2006
Motors Insurance Corporation (MIC) - extended warranty	04/05/2006
Universal Warranty Corporation (UWC) - extended warranty	04/11/2006

TABLE 5-2: DATA SOURCES

6. Describe in detail the search criteria used by GM to identify the claims identified in response to Request No. 5, 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 subject condition in the subject peer vehicles. State, by make and model year, the terms of the new vehicle warranty coverage offered by GM on the subject peer 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 GM offered for the subject peer vehicles and state by option, model, and model year, the number of vehicles that are covered under each such extended warranty.

GM searched the GM North America Claim Adjustment Retrieval Database (CARD-regular warranty), the Motors Insurance Corporation (MIC - extended warranty), and the Universal Warranty Corporation (UWC - extended warranty) databases for the following labor code:

E0420 – Wheel, One-Replacement

GM identified 18 regular warranty claims as a result of searching for labor code E0420. After review of the trouble codes and customer codes contained in these 18 claims, GM determined that none of the claims are responsive to the subject condition. The majority of the trouble codes were: out of round, balance/imbalance and warped/wavy/wrinkled. The majority of the customer codes were: operation/vibration and leaks. There were no warranty claims with trouble codes: cracked, broken, cut or torn.

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 customers' preference, up to 7 years from the date of purchase or up to a total of 100,000 vehicle miles. The GM warranty system does not contain information on the number of vehicles that have extended warranty coverage.

7. State the number of subject components that GM has sold that may be used in the subject peer 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). 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 for the subject component is provided on the Attachment 1 CD; refer to the folder labeled "Response to Q7." GM does not offer any kits that have been released or developed for use in service repairs specifically related to the subject condition. The data was last gathered on April 18, 2006.

These sales numbers represent sales to dealers in the US and Canada of steel wheels for Impala Police Package vehicles and all other GM W cars: (Chevrolet Impala, Lumina, Monte Carlo; Pontiac Grand Prix; Oldsmobile Intrigue; Buick Regal, Century, Lacrosse) originally equipped with steel wheels. This data has limited analytical value in analyzing the field performance of a motor vehicle component because the records do not contain sufficient information to establish the reason for the part sale. It is not possible from this data to determine the number of these parts that have been installed in the subject vehicles or the number remaining in dealer or replacement part supplier inventory.

This table contains service part numbers, part description, part usage information including the GM vehicles that contain the identical component, part sales figures by month and calendar year and the supplier's name and address, contact name and phone number.

8. Provide an engineering drawing for each subject component part number identified in Request No. 7.

The engineering drawing of the subject component is contained in the Confidential Attachment 1 CD in the folder labeled "Response to Q8" attachment.

* * *

This response is based on searches of GM 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 past and present officers and employees, whether assigned to its principal offices or any of its field or other locations, including 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 2000, were involved in any way with any of the following related to the subject condition in the subject peer 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
- 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,



Gay P. Kent
Director

Product Investigations

Attachment: 1 CD

GM-687
EA04-034

GM CONFIDENTIALITY LETTER