



GENERAL MOTORS NORTH AMERICA
Structure & Safety Integration

April 11, 2005

Jacqueline Glassman, Esq.
Office of Chief Counsel
NHTSA Safety Assurance
Room #5219
400 Seventh Street, S.W.
Washington, D.C. 20590

APR 22 14 47

OFFICE OF CHIEF COUNSEL

GM-668

NVS-213kmb
PE04-075

Dear Ms. Glassman:

In response to a request by Jeff Quandt, on March 10, 2005 General Motors sent him, by e-mail, a two-page document that provided information for three engine stalling investigations; PE04-075, EA03-007, and EA04-008. The document was named "GM668RiskAssessmentFrameworkSummaryNHTSADraftUpdatedMar102005.doc." A copy of the information contained in this file is attached. The information provided in the file is organized and documented using the risk assessment framework that General Motors has recently developed for engine stalling.

Although this information was sent without being stamped "GM Confidential," General Motors requests that the document (file named "GM668RiskAssessmentFrameworkSummaryNHTSADraftUpdatedMar102005.doc") be afforded confidential treatment without a time limitation by 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).

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. Documents containing information pertaining to our engine stalling assessment framework provided in the e-mail to Jeff Quandt on March 10, 2005 have, to the best of our knowledge, normally been granted confidential treatment by the NHTSA in the past. The information in the e-mail is of a type for which a class determination of confidentiality has been made under 49 CFR Part 512, Appendix B.

GM requests confidential treatment of the information in this document because it includes trade secrets, disclosure of which would cause substantial competitive harm. GM submits that the competitive harm would be substantial, because the design and manufacture of vehicles and vehicle components are the core of its business and because global competition in that business is intense.

The engine stalling assessment document provided at the request of Jeff Quandt, in file GM668RiskAssessmentFrameworkSummaryNHTSADraftUpdatedMar102005.doc, discloses the framework for GM's assessment of engine stalls and related product analysis. This information would give competitors insight into GM's methodologies and business practices for evaluating its products. The development of a safety assessment and related test procedures involves time, effort, and skill to plan and execute. Knowledge of GM's methodologies to test and evaluate a product would give a competitor valuable information that it would otherwise have to spend its time and money to develop, and therefore would deprive GM of the competitive advantage of its efforts without any compensation.

General Motors treats the above material as confidential proprietary information available only to authorized General Motors and supplier personnel and not otherwise available to the public. The

Product Investigations

Mail Code: 480-106-304 • 30200 Mound Road • Warren, MI 48090-9010
GM668 Confidentiality Request JQuandt Email Material



document is 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).

The corresponding electronic copies of these documents are being provided on a CD labeled "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.

Please contact me if you require further information about this request.

Sincerely,

A handwritten signature in black ink, appearing to read "G. Kent", with a stylized flourish extending from the end.

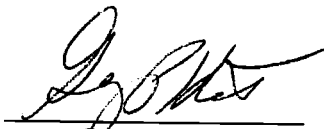
Gay P. Kent
Director
Product Investigations

Attachments

CERTIFICATE IN SUPPORT OF REQUEST FOR CONFIDENTIALITY

I, Gay P. Kent, pursuant to the provisions of 49 CFR Part 512, state as follows:

- (1) I am Director of Product Investigations of General Motors Corporation and am authorized to execute this certificate on its behalf.
- (2) I certify that the information contained in the document identified in the letter dated April 11, 2005 is confidential and proprietary data and is being submitted with the claim that it is entitled to confidential treatment under 5 U.S.C. 552(b)(4) and 49 C.F.R. Part 512.
- (3) I hereby request that the information be protected without a time limitation.
- (4) This certification is based on the information provided by the responsible GM personnel who have responsibility for the documents being provided to NHTSA for which a claim of confidentiality has been made.
- (5) Based on that information, to the best of my knowledge, information and belief, the information for which GM has claimed confidential treatment has never been released or made available outside GM and supplier or customer personnel.
- (6) 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.
- (7) I certify under penalty of perjury that the foregoing is true and correct. Executed on this the 11th day of April 2005.



Gay P. Kent
Director
Product Investigations

APPLYING STALL ASSESSMENT FRAMEWORK: GM668, GM638, and GM650

	---- GM668 ----	---- GM650 ----
Total Vehicle Production (Gas only)	39,078	25,353
Models	MY '04-05 AZTEK RENDEZVOUS	MY '03 SAAB 9-3 (210HP / 175 HP)
OBJECTIVE DETERMINATION		
THRESHOLD ISSUES:		
Crash, Injury, Fires?	2 Crashes ⁽¹⁾ , 1 Injury ⁽¹⁾ , 0 Fires	2 Crashes ⁽²⁾ , 0 Injuries, 0 Fires
SEVERITY ISSUES:		
CONDITIONS (when stall may occur)		
Specific driving maneuvers	May happen on starting	(1) 175 hp on decel / coast (2) 210 hp on aborted take-off
Specific vehicle operation	No.	Yes (engine control algorithms, hardware)
EFFECT ON VEHICLE PERFORMANCE		
Reduced steering assist	By judgment – 5 th %female	MPG Demonstration – 5 th %female, brake reserve
Brake assist reserve	By judgment	MPG Demonstration - ~4-6 full brake applies
ABILITY TO RESTART		
Assess Restarting Capability	Towing analysis - ~80% capable of restarting	100% restart capability
SUBJECTIVE APPLICATION		
APPLY APPROPRIATE FREQ INFO		
Occurrence information (Warranty)	43 IPTV @ 14 months in service	705.7 IPTV @ 12 months in service
Complaint Rates	4.2 IPTV @ 14 months in service (worst month)	25.4 IPTV @ ~15 months in service
Trend / Slope	Pred. Incr then Decr. Field data Decr.	No predictions
ASSESS EFFECT DRIVER WARNING		
Sensory – “Seat of Pants”	May exper. trouble starting prior to exper. stall	(1) 175 hp – No. (2) 210 hp – may feel engine oscillation
Visual/Audible (diagnostics)	No warning. Some indication.	No warning. Some indication.

- (1) Crash Data Retrieval information indicates one accident occurred while the engine was running and the vehicle was moving. This is the same vehicle for which the report of injury was obtained.
- (2) Two crashes reported in GM Response, however subsequent investigation revealed that neither crash was related to stalling condition.

GM CONFIDENTIAL

APPLYING STALL ASSESSMENT FRAMEWORK: GM668, GM638, and GM650

	---- GM668 ----	---- GM638 ----
Total Vehicle Production (Gas only)	39,078	55,111
Models	MY '04-05 AZTEK RENDEZVOUS	MY '02 ENVOY BRAVADA
OBJECTIVE DETERMINATION		
THRESHOLD ISSUES:		
Crash, Injury, Fires?	2 Crash ⁽¹⁾ , 1 Injuries ⁽¹⁾ , 0 Fires	1 Crash, 1 Injuries, 0 Fires
SEVERITY ISSUES:		
CONDITIONS (when stall may occur)		
Specific driving maneuvers	May happen on starting	No
Specific vehicle operation	No.	Yes. During Electronically Controlled Air Springs (ECAS) operation.
EFFECT ON VEHICLE PERFORMANCE		
Reduced steering assist	By judgment – 5 th %female	MPG Demonstration – 5 th %female, brake reserve
Brake assist reserve	By judgment	MPG Demonstration - ~3-4 full brake applies
ABILITY TO RESTART		
Assess Restarting Capability	Towing analysis - ~80% capable of restarting	~30% capable of restarting
SUBJECTIVE APPLICATION		
APPLY APPROPRIATE FREQUENCY		
Occurrence information (Warranty)	43 IPTV @ 14 months in service	226 IPTV @ 12 months in service
Complaint Rates	4.2 IPTV @ 14 months in service (worst month)	11.3 IPTV @ ~14 months in service 15.1 IPTV @ ~18 MIS
Trend / Slope	Pred. Incr then Decr. Field data Decr.	Pred. Std. to Decr.
ASSESS EFFECT DRIVER WARNING		
Sensory – “Seat of Pants”	May exper. trouble starting prior to exper. stall	No.
Visual/Audible (diagnostics)	No.	No.

(1) Crash Data Retrieval information indicates one accident occurred while the engine was running and the vehicle was moving. This is the same vehicle for which the report of injury was obtained.

GM CONFIDENTIAL