



Date: October 12, 2004

GM-656A (EA04-021)

On The Cover:

GM Assigned IR Number
NHTSA Assigned Evaluation Number
Number of Books
Allegation Title, Model Year and Make
Date Received from NHTSA
GM Reply Date

Book 1:

Tab (1)..... GM Response Letter to NHTSA
Tab (2)..... NHTSA Letter
Tab (3)..... Attachment Q1 with (1) CD
Tab (4)..... Attachment Q3 with (1) CD
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GENERAL MOTORS NORTH AMERICA
Structure & Safety Integration

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 2004 OCT 13 AM 10:59
 OFFICE OF DEFECTS INVESTIGATION

October 12, 2004

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

GM-656A

NVS-212am
 EA04-021

Dear Ms. DeMeter:

This letter is General Motors (GM) response to your information request (IR), dated August 11, 2004, regarding allegations of failure of the brake lamp circuit board which causes the brake lamps not to illuminate when the brake pedal is depressed on 2002-2004 Model Year (MY) Chevrolet TrailBlazer vehicles.

The subject vehicles for this inquiry are 2002-2004 MY Chevrolet TrailBlazer & TrailBlazer EXT, GMC Envoy & Envoy XL, Oldsmobile Bravada and 2004 MY Buick Rainier vehicles.

The design of the brake/tail lamp assembly on the GMC Envoy XUV is different from the design of the brake/tail lamp assembly on the subject vehicles; therefore, the GMC Envoy XUV is not a subject vehicle for this inquiry.

Your questions and our corresponding replies are as follows:

1. State, by model and model year, the number of subject vehicles GM has manufactured for sale or lease in the United States. Separately, for each subject vehicle manufactured to date, state the following:
 - a. Vehicle identification number (VIN);
 - b. Make;
 - c. Model;
 - d. Model Year;
 - e. Date of manufacture;
 - f. Date warranty coverage commenced; and
 - g. 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, Data Collection Disc, for a pre-formatted table that provides further details regarding this submission.

General Motors is providing the number of subject vehicles produced for sale or lease in the United States by model and model year in Table 1 below:



MODEL	2002 MY	2003 MY	2004 MY*	TOTAL
Chevrolet TrailBlazer	253,221	193,929	209,225	656,375
Chevrolet TrailBlazer EXT	23,905	87,028	89,242	180,175
GMC Envoy	109,861	83,069	82,849	636,550
GMC Envoy XL	12,852	58,002	38,926	107,780
Oldsmobile Bravada	28,709	8,842	3,475	40,826
Buick Rainier	0	0	28,969	28,969
TOTAL	427,348	428,670	432,686	1,288,704

TABLE 1 VEHICLE PRODUCTION
*Vehicle production as of July 2, 2004

The production information requested in 1a-1g is provided on the CD labeled Response to Q1; refer to the Microsoft Access 2000 file. The GM database that contains Vehicle Identification Number (VIN) information does not include information on the state where an individual vehicle was sold. GM is providing the state where the vehicle was shipped in response to request 1g. 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 alleged defect in the subject 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 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 "c," 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 item "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.

Table 2-1 below summarizes records that could relate to the subject condition.

TYPE OF REPORT	COUNT (INCLUDING DUPLICATES)	GM REPORTS	GM REPORTS CORRESPONDING TO NHTSA REPORTS PROVIDED	LOCATION OF REPORTS (ATTACHMENT)	NUMBER WITH PROPERTY DAMAGE	NUMBER WITH CRASH	NUMBER WITH INJURIES/FATALITIES*	NUMBER WITH FIRE
Owner Reports	1,305	1,305	0	2A	0	0	0	0
Field Reports & Technical Assistance System Reports	31	31	0	2B	2	2	1	0
Not-in-Suit Claims	0	0	0	N/A	0	0	0	0
Subrogation Claims	0	0	0	N/A	0	0	0	0
Third Party Arbitration Proceedings	0	0	0	N/A	0	0	0	0
Product Liability Lawsuits	0	0	0	N/A	0	0	0	0
Total (Including Duplicates)	1,336	1,336	0	N/A	2	2	1	0
Total (Excluding Duplicates)	1,335	1,335	0	N/A	2	2	1	0

TABLE 2-1: REPORT BREAKDOWN
 N/A Not Applicable

*GM is not aware of any fatalities related to the subject condition.

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	08/23/2004
Customer Assistance Center	08/20/2004
Technical Assistance Center	08/23/2004
Field Information Network Database (FIND)	08/17/2004
Company Vehicle Evaluation Program (CVEP)	08/18/2004
Captured Test Fleet (CTF)	08/18/2004
Early Quality Feedback (EQF)	08/30/2004
Field Product Report Database (FPRD)	08/17/2004
Legal / Employee Self Insured Services (ESIS)	08/20/2004

TABLE 2-2: DATA SOURCES

3. For each item (complaint, report, claim, notice, or matter) within the scope of your response to Request No. 2, state the following information:
- GM's file number or other identifier used;
 - The category of the item, as identified in Request No. 2 (i.e., consumer complaint, field report, etc.);
 - Vehicle owner or fleet name (and fleet contact person), address, and telephone number;
 - Vehicle's VIN;
 - Vehicle's make, model and model year;
 - Vehicle's mileage at time of incident;
 - Incident date;
 - Report or claim date;
 - Whether a crash is alleged;
 - Whether property damage is alleged;
 - Number of alleged injuries, if any; and,
 - 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, Data Collection Disc, for a pre-formatted table that provides further details regarding this submission.

The requested information is provided on the CD labeled Response to Q3; refer to the Microsoft Access 2000 file.

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.

Copies of the records identified in item 2 are provided in the attachments listed in Table 2-1 on the CD labeled Response to Q3. GM has organized the records by the GM file number within each attachment.

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 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:

- GM's claim number;
- Vehicle owner or fleet name (and fleet contact person) and telephone number;
- VIN;
- Repair date;
- Vehicle mileage at time of repair;
- 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."

The 237,513 regular warranty claims and 3,565 extended warranty claims for the subject vehicles that may be responsive to this request, are summarized by model and model year in Tables 5A and 5B. The 39,864 warranty repairs made through September 29, 2004, as a result of Special Policy - Tail Lamps/Stop Lamps #04017 (labor code T5601) are summarized by model and model year in Table 5C. A summary of the warranty claims in Tables 5A, 5B and 5C is provided on the CD labeled Response to Q5.

Regular Warranty Claims

MODEL	2002MY	2003MY	2004MY	TOTAL
Chevrolet TrailBlazer	107,490	64,441	2,520	174,451
Chevrolet TrailBlazer EXT	12,716	26,644	301	37,660
GMC Envoy	9,470	5,751	239	15,460
GMC Envoy XL	1,073	3,409	78	4,560
Oldsmobile Bravada	4,175	1,149	15	5,339
Buick Rainier	0	0	43	43
TOTAL	134,823	99,394	3,196	237,513

TABLE 5A

Extended Warranty Claims

MODEL	2002MY	2003MY	2004MY	TOTAL
Chevrolet TrailBlazer	2,162	132	0	2,294
Chevrolet TrailBlazer EXT	112	62	0	174
GMC Envoy	326	19	0	344
GMC Envoy XL	20	15	0	35
Oldsmobile Bravada	707	11	0	718
Buick Rainier	0	0	0	0
TOTAL	3,328	239	0	3,565

TABLE 5B

Special Policy - Warranty Claims (T5601)

MODEL	2002MY	2003MY	2004MY	TOTAL
Chevrolet TrailBlazer	18,056	8,599	794	28,449
Chevrolet TrailBlazer EXT	1,901	3,799	98	5,798
GMC Envoy	2,453	811	60	3,324
GMC Envoy XL	278	478	27	783
Oldsmobile Bravada	1,283	220	3	1,506
Buick Rainier	0	0	6	6
TOTAL	24,971	13,907	988	39,864

TABLE 5C

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 warranty data was last gathered on August 14, 2004.

GM's warranty database does not contain the vehicle owner's name or telephone number. Some of the replacement part numbers; part descriptions and customer concern code descriptions are not included in the GM warranty database. GM is providing a field labeled "Verbatim Text" in response to request 5K (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 extended warranty system does not contain the following information: repairing dealer code, vehicle owner information, trouble code, trouble code description, part number, part description or verbatim. The UWC extended warranty system does not use the GM labor code or labor code description and it does not contain the repairing dealer code, trouble code or trouble code description.

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.

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 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 GM regular warranty data was collected by searching GM CARD for the labor and trouble codes that may be related to failure, malfunction or unsatisfactory performance of the brake lamp circuit board, which causes the brake lamps not to illuminate when the brake pedal is depressed. A list of the labor codes, labor code descriptions, trouble codes and trouble code descriptions is contained on the CD labeled Response to Q6; refer to the Microsoft Excel file.

The MIC extended warranty data was collected by searching for the labor codes. The UWC extended warranty data was collected by searching for the labor code description "Enhanced Electrical Miscellaneous".

The warranty data provided has limited analytical value in analyzing the field performance of a motor vehicle component. The labor operation codes listed above may be applicable to the alleged defect, but are also related to other issues. 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.

In addition to the new vehicle warranty and the extended warranty options described above GM has decided to address this condition by offering a Special Policy extended warranty for 6 years. The extended warranty coverage provided by the Special Policy is described on the CD labeled Response to Q7.

7. 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, bulletins, 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.

The GM response to PE04-032 dated May 27, 2004, contained copies of all service, warranty and other documents that relate to, or may relate to the subject condition in the subject vehicles. The information provided in the GM response to PE04-032 included a draft copy of the bulletin titled, Special Policy - Tail Lamp/Stop Lamps #04017. This version of the bulletin contained only Chevrolet part numbers and was issued on June 3, 2004.

The CD labeled Response to Q7 contains a copy of the bulletin titled, Special Policy - Tail Lamps/Stop Lamps #04017A, dated August 6, 2004. This version of the special policy bulletin contains the Chevrolet, GMC, Oldsmobile and Buick part numbers and was issued August 6, 2004. GM is not planning to issue any other communications within in the next 120 days related to the subject condition in the subject vehicles.

8. 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.

Information regarding assessments, analyses, tests, studies, surveys, simulations investigations, inquiries and evaluations was provided in the GM response to PE04-032, dated May 27, 2004.

GM Product Investigations requested that the GM Customer Assistance Center (CAC) conduct a survey of warranty claim customers. The survey began on September 22, 2004, and was completed September 28, 2004. The objective of the survey was to obtain information directly from warranty repair customers regarding rear brake lamp circuit board failures that cause the brake lamps not to illuminate when the brake pedal is depressed.

The survey questions are contained in Attachment 8A provided on the CD labeled Response to Q8. GM CAC obtained responses to the survey questions from 529 randomly selected warranty customers. The results of the survey are contained in Attachment 8B on the CD labeled Response to Q8. A summary of the findings and conclusions of the survey are contained in Attachment 8C on the CD labeled Response to Q8.

9. Describe all modifications or changes made by, or on behalf of, GM in the design, material composition, manufacture, quality control, supply, or installation of the subject components, from the start of production to date, which relate, 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;
 - 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 that GM is aware of which may be incorporated into vehicle production within the next 120 days.

Information regarding modifications or changes made by, or on behalf of, GM in the subject component was provided in the GM response to PE04-032 dated May 27, 2004. GM is not aware of any modifications or changes that have been incorporated, or may be incorporated into vehicle production within the next 120 days that we did not identify in our response to PE04-032.

10. 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 out-off date for sales, if applicable:
- a. Subject components; and,

- b. Any kits that have been released, or developed, by GM for use in service repairs to the subject component/assembly.

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 CD labeled Response to Q10; refer to the Microsoft Excel file. GM does not offer any kits that have been released or developed for use in service repairs specifically related to the subject condition.

These sales numbers represent sales to dealers in the US and Canada. 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. 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.

11. In Attachment 9b, Page 8 of 15 (.pdf) of Question 9 from GM's Information Request Response to PE04-032, GM mentions that testing was done on the circuit board and that the board deformed at 215 degrees F and that normal bulb operation is at 285 degrees F. Also mentioned are two files which relate to the results of the testing: Tallamps pic.doc and Questra.doc. Please provide copies of those files in electronic format.

The two requested documents are provided in electronic format on the CD labeled Response to Q11. The document titled Questra.doc is a Material Safety Data sheet for QUESTRA Crystalline Polymers provided by The Dow Chemical Company that contains safety and handling considerations for QUESTRA Crystalline Polymers. The document titled Tallamps pic.doc is a pictorial illustration of the differences in the Wagner and Sylvania tall lamp bulbs as described in the GM response to PE04-032 dated May 27, 2004.

12. Provide GM's assessment of the alleged defect in the subject vehicle, including:

- a. The causal or contributory factor(s);
- b. The failure mechanism(s);
- c. The failure mode(s);
- d. The risk to motor vehicle safety that it poses;
- e. What warnings, if any, the operator and the other persons both inside and outside the vehicle would have that the alleged defect was occurring or subject component was malfunctioning; and,
- f. The reports included with this inquiry.

General Motors assessment of the causal or contributory factors, failure mechanisms and failure modes has not changed from those provided in the GM response to PE04-032 dated May 27, 2004.

The failure mechanisms and contributory factors identified in the May 27, 2004, GM response do not affect all of the brake lamps on the subject vehicles. The Center High Mounted Stop Lamp (CHMSL) provides an independent indication of braking not affected by the subject condition. The CHMSL continues to illuminate when the brake pedal is depressed. Thus the illuminated CHMSL indicates that the vehicle brakes have been applied and the vehicle is decelerating.

General Motors has identified 2 crashes and 1 injury report that may be related to the subject condition. General Motors has notified 908,778 owners of the subject vehicles that it will correct this condition free of charge for a period of 8 years or 72,000 miles whichever occurs first, from the date the vehicle was originally placed in service, regardless of ownership. As of October 6, 2004, only 4.3 percent of the owners notified of the Special Policy have had repairs made to their vehicle related to the subject condition.

* * *

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 2000, 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; 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

Attachments



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

AUG 11 2004

GM-656A

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

*Mark Jackson
Kim Dorell*

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Gay P. Kent, Director
Product Investigations, Structure and Safety Integration
General Motors Corporation
Mail Code: 480-106-304
30500 Mound Road
Warren, MI 48090-9055

NVS-212am
EA04-021

Dear Ms. Kent:

This letter is to inform you that the Office of Defects Investigation (ODI) of the National Highway Traffic Safety Administration (NHTSA) has opened an Engineering Analysis (EA04-021) to investigate allegations of brake lamp failure in model year (MY) 2002-2004 Chevrolet Trailblazer, EXT; GMC Envoy, XL, XUV; Oldsmobile Bravada; and 2004 Buick Rainier sport utility vehicles manufactured by General Motors Corporation (GM). As part of this investigation, this letter requests certain information from GM.

This office has received 65 complaints from the Agency's Auto Safety Hotline and 622 complaints from GM via Preliminary Evaluation (PE04-032) of brake lamp failure in the above mentioned vehicles.

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

- **Subject Vehicles:** all MY 2002-2004 Chevrolet Trailblazer, EXT; GMC Envoy, XL, XUV; Oldsmobile Bravada; and 2004 Buick Rainier sport utility vehicles manufactured for sale or lease in the United States.
- **Subject Component(s):** brake lamp circuit board installed on the subject vehicles.
- **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



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888-327-4238

2000, 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; 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.
- **Alleged defect:** the failure, malfunction, or otherwise unsatisfactory performance of the brake lamp circuit board, which causes the brake lamps not to illuminate when the brake pedal is depressed.
 - **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 the manufacturer 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," "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 alleged defect, 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 vehicles GM has manufactured for sale or lease in the United States. Separately, for each subject vehicle manufactured to date, state the following:
 - a. Vehicle identification number (VIN);
 - b. Make;
 - c. Model;
 - d. Model Year;
 - e. Date of manufacture;
 - f. Date warranty coverage commenced; and
 - g. 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, Data Collection Disc, for a pre-formatted table that 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 alleged defect in the subject 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 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 "c," 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 item "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. 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, Data Collection Disc, for a pre-formatted table that 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 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;
- 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."

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 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.
7. 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, bulletins, 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.
8. 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.

9. Describe all modifications or changes made by, or on behalf of, GM in the design, material composition, manufacture, quality control, supply, or installation of the subject components, from the start of production to date, which relate, 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;
 - 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 that GM is aware of which may be incorporated into vehicle production within the next 120 days.

10. 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. Subject components; and,
 - b. Any kits that have been released, or developed, by GM for use in service repairs to the subject component/assembly.

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.

11. In Attachment 9b, Page 8 of 15 (.pdf) of Question 9 from GM's Information Request Response to PE04-032, GM mentions that testing was done on the circuit board and that the board deformed at 215 degrees F and that normal bulb operation is at 285 degrees F. Also mentioned are two files which relate to the results of the testing: Tailamps pic.doc and Qestra.doc. Please provide copies of those files in electronic format.
12. Provide GM's assessment of the alleged defect in the subject vehicle, including:
 - a. The causal or contributory factor(s);
 - b. The failure mechanism(s);
 - c. The failure mode(s);
 - d. The risk to motor vehicle safety that it poses;
 - e. What warnings, if any, the operator and the other persons both inside and outside the vehicle would have that the alleged defect was occurring or subject component was malfunctioning; and,
 - f. The reports included with this inquiry.

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 \$15 million for a related series of violations, for failing or refusing to perform an act required under 49 U.S.C. § 30166. 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.

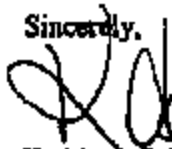
GM's response to this letter, in duplicate, together with a copy of any confidentiality request, must be submitted to this office by September 28, 2004. Please refer to EA04-021 in GM's response to this letter. If GM finds that it is unable to provide all of the information requested

within the time allotted, GM must request an extension from Mr. Thomas Z. Cooper at (202) 366-5218 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, 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.

If you have any technical questions concerning this matter, please call Mr. Ali Motamedamin of my staff at (202) 366-7021.

Sincerely,



Kathleen C. DeMeter, Director
Office of Defects Investigation
Enforcement

Enclosure: One CD ROM titled Data Collection Disc containing three files

GM656A
EA04-021

ATTACHMENT "Q1"

GM656A
EA04-021

ATTACHMENT "Q3"

GM656A
EA04-021

ATTACHMENT "Q5"

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ATTACHMENT "Q6"

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ATTACHMENT "Q7"

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ATTACHMENT "Q8"

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ATTACHMENT "Q10"

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ATTACHMENT "Q11"