



GENERAL MOTORS NORTH AMERICA
Structure & Safety Integration

Handwritten: 7/27/05

July 22, 2005

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2005 JUL 26 P 4:05
OFFICE OF
INVESTIGATION

Richard P. Boyd, Chief
Vehicle Control Division
Office of Defects Investigation
NHTSA Safety Assurance
Room #5328
400 Seventh Street, S.W.
Washington, D.C. 20580

GM-871 Supplement 3

NVS-213phk
PE04-060

Dear Mr. Boyd:

This letter is General Motors' (GM) response to your request for additional information regarding the subject investigation. GM is providing vehicle production volumes, customer complaints, field reports, and warranty information for allegations of front steering knuckle fractures attachment for MY 1999 through 2005 GMT800 and H2 vehicles:

Hummer: H2 SUV H2 SUT	Chevrolet: Avalanche 2500 Suburban 2500 Silverado 1500HD, 2500, & 3500 series	GMC: Yukon XL 2500 Sierra 1500HD, 2500, & 3500 series
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The number of subject vehicles GM has manufactured for sale or lease in the United States is shown in Table 1. An electronic summary of the production data is provided on the CD identified as Attachment 1; refer to the Microsoft Access 2000 file in the folder labeled "Response for Q1 - S3 - PRODUCTION DATA."

MAKE/ MODEL	1999 MY	2000 MY	2001 MY	2002 MY	2003 MY	2004 MY	2005 MY	TOTAL
Hummer / H2 SUV	N/A	N/A	N/A	N/A	47,826	21,530	22,216*	91,672
Hummer / H2 SUT	N/A	N/A	N/A	N/A	N/A	N/A	8,080*	8,080
Chevrolet Avalanche 2500	N/A	N/A	N/A	6,087	2,104	1,584	852*	10,607
Chevrolet Suburban/ GMC Yukon XL 2500	N/A	10,522	22,717	10,472	11,248	10,221	7,899*	73,077
GMT800/1500 HD	N/A	N/A	16,888	31,911	44,159	N/A	9,056*	102,062
GMT800/2500	48,866	87,316	198,382	231,756	246,907	289,369	240,312*	1,349,908
GMT800/3500	N/A	N/A	38,880	31,473	36,146	46,670	54,002*	209,171
Total	48,866	107,838	274,945	311,699	388,488	369,354	342,397	1,844,587

TABLE 1 VEHICLE PRODUCTION SUMMARY
* VEHICLE PRODUCTION AS OF JUNE 30, 2005.
N/A= NOT APPLICABLE

This data was collected from the GM Claims Analysis Retrieval Database (CARD) on June 30, 2005.



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

TYPE OF REPORT	COUNT (INCLUDING DUPLICATES)	GM REPORTS	GM REPORTS CORRE- SPONDING TO NHTSA REPORTS	LOCATION OF REPORTS (ATTACHMENT)	NUMBER WITH PROPERTY DAMAGE	NUMBER WITH CRASH*	NUMBER WITH INJURIES/ FATALITIES*
Owner Reports	58	57	1	Folder labeled "Response to Q3" in field label 2A	15	41	3
Field Reports & Technical Assistance System Reports	8 [#]	8 [#]	0	Folder labeled "Response to Q3" in field label 2B	0	1	0
Not-In-Suit Claims	6	4	2	Folder labeled "Response to Q3" in field label 2C	1	4	4
Subrogation Claims	6	7	1	Folder labeled "Response to Q3" in field label 2D	3	6	1
Third Party Arbitration Proceedings	0	0	0	N/A	0	0	0
Product Liability Lawsuits	3	3	0	Folder labeled "Response to Q3" in field label 2E	1	2	1
Total (Including Duplicates)	83	79	4	N/A	20	54	9
Total (Excluding Duplicates)	70	67	3	N/A	17	47	7

TABLE 2-1: REPORT BREAKDOWN

* IN OVER HALF OF THESE CASES, INFORMATION CONTAINED IN DRIVER STATEMENTS, POLICE REPORTS, AND CUSTOMER ASSISTANCE CALL CENTER RECORDS IS CONSISTENT WITH STEERING KNUCKLE FRACTURE FOLLOWING IMPACT WITH AN OBJECT.

FIVE OF PREVIOUS H2 OWNER REPORTS WERE MISCLASSIFIED AS FIELD REPORTS.

* GM HAS NO FATALITY REPORTS

N/A NOT APPLICABLE

The sources of the requested information and the last date the searches were conducted are tabulated in Table 2-2 below. Based on input from the GM Customer Assistance Call Center, the legacy automotive terminology "spindle" was added to the search criteria for this response.

SOURCE SYSTEM	LAST DATE GATHERED
Corporate Central File	6/16/2005
Customer Assistance Center	6/8/2005
Technical Assistance Center	6/8/2005
Early Quality Feedback (EQF)	6/8/2005
Field Information Network Database (FIND)	6/8/2005
Field Product Report Database (FPRD)	6/8/2005
Company Vehicle Evaluation Program (CVEP)	6/3/2005
Captured Test Fleet (CTF)	6/3/2005
Legal / Employee Self Insured Services (ESIS)	7/20/2005

TABLE 2-2: DATA SOURCES

An electronic summary of the 70 reports included in response to question 2 is provided on the CD identified as Attachment 1 CD; refer to the Microsoft Access 2000 file in the folder labeled "Response to Q3 - S3 - REQUEST NUMBER TWO DATA." GM has organized this summary by GM file number within each attachment. Certain dealer repair records were not provided from the dealership.

To date, GM's investigation of the subject condition has not included an assessment of the cause(s) of each incident responsive to Request No. 2. Many of the records report the problem and do not contain sufficient reliable information to accurately assess cause, if any. Assessments of other incidents (from lawsuits and claims) may be attorney work product and/or privileged. Therefore, information and documents provided in this response consist only of non-attorney work product and/or non-privileged material for incidents that have been reported to, but not assessed by, GM.

For the subject vehicles, the regular warranty claims and extended warranty claims are summarized by model and model year in Tables 5-1 and 5-2. A summary of these warranty claims is provided on the Attachment 1 CD; refer to the folder labeled "Response to Q5 - S3."

MODEL	1999 MY	2000 MY	2001 MY	2002 MY	2003 MY	2004 MY	2005 MY	TOTAL
Hummer / H2 SUV	N/A	N/A	N/A	N/A	10	1	1	12
Hummer / H2 SUT	N/A	N/A	N/A	N/A	N/A	N/A	0	0
Chevrolet Avalanche	N/A	N/A	N/A	3	0	0	0	3
Chevrolet Suburban/ GMC Yukon XL	N/A	0	2	0	0	1	0	3
GMT800 / 1500 HD	N/A	N/A	4	0	3	N/A	0	7
GMT800 / 2500	4	8	19	18	18	7	1	74
GMT800 / 3500	N/A	N/A	3	8	4	0	0	13
Total	0	8	34	30	41	10	3	132

TABLE 5-1: REGULAR WARRANTY CLAIMS

N/A NOT APPLICABLE

MODEL	1999 MY	2000 MY	2001 MY	2002 MY	2003 MY	2004 MY	2005 MY	TOTAL
Hummer / H2 SUV	N/A	N/A	N/A	N/A	0	N/A	N/A	0
Hummer / H2 SUT	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Chevrolet Avalanche	N/A	N/A	N/A	0	0	N/A	N/A	0
Chevrolet Suburban/ GMC Yukon XL	N/A	1	0	0	0	N/A	N/A	1
GMT800 / 1500 HD	N/A	N/A	0	0	0	N/A	N/A	0
GMT800 / 2500	1	5	5	5	4	N/A	N/A	20
GMT800 / 3500	N/A	N/A	3	1	2	N/A	N/A	6
Total	1	6	8	6	6	0	0	27

TABLE 5-2; EXTENDED WARRANTY CLAIMS

N/A NOT APPLICABLE

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 June 30, 2005. Based on input from the GM Customer Assistance Call Center, the legacy automotive terminology "spindle" was added to the search criteria for this response.

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". 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 text. 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.

The regular warranty data was collected from the GM CARD database by searching for the labor operation codes listed in Table 6-1 and trouble codes listed in Table 6-2. The regular warranty data with part cost information and repair description were also reviewed in verification of the steering knuckle replacement.

LABOR CODE	DESCRIPTION
E2520	KNUCKLE ASSEMBLY, R-STEERING-REPLACE
E2521	KNUCKLE ASSEMBLY, L-STEERING-REPLACE
E2527	KNUCKLE ASSEMBLY, BOTH STEERING-RPL
E2720	SPINDLE - RIGHT - REPLACE
E2721	SPINDLE - LEFT - REPLACE
E2727	SPINDLE - BOTH - REPLACE

TABLE 6-1: LABOR CODES USED IN CARD & MIC SEARCH

TROUBLE CODE	TROUBLE DESCRIPTION
1B	CASTING DEFECT
1D	BROKEN
1K	CRACKED
3Z	RUPTURED
4D	SHEARED
4H	TORN
4R	WELD BROKEN
4Q	WEAK
4X	WORN
6C	COMPONENT-INOPERATIVE

TABLE 6-2: REGULAR WARRANTY TROUBLE CODES

The MIC extended warranty data was also collected by searching for the labor codes listed in Table 6-1. The UWC extended warranty data was collected by searching for the labor codes in Table 6-3.

LABOR CODE	DESCRIPTION
0550	STEERING KNUCKLE

TABLE 6-3: LABOR CODES USED IN UWC SEARCH

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 General Motors warranty system does not contain information on the number of vehicles that have extended warranty coverage.

* * *

GM claims that certain information, in documents that are part of lawsuit and claims files maintained by the GM Legal Staff, is attorney work product and/or privileged. That information includes notes, memos, reports, photographs, and evaluations by attorneys (and by consultants, claims analysts, investigators, and engineers working at the request of attorneys). GM is producing responsive documents from claims files that are neither attorney work product nor privileged and withholding those that are attorney work product and/or privileged.

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 their divisions, subsidiaries (whether or not incorporated) and affiliated enterprises and all of their headquarters, regional, zone and other offices and

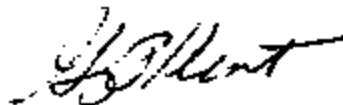
their employees, and all agents, contractors, consultants, attorneys and law firms and other persons engaged directly or indirectly (e.g., employee of a consultant) by or under the control of GM (including all business units and persons previously referred to), who are or, in or after January 1, 2000, 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

E-mail from NHTSA for this update request:

As we move forward, one of the things that would be helpful would be to get information provided in responses to our Dec 17th letter for other models of vehicles using the same steering knuckle. Specifically the information in questions 1,2,3, 4,5, and 6. My understanding is that GMT800 platform, chassis lines - C3,K3,C2,K2 and possible the G2 and G3's going back to 2001 use the same knuckle? If there are other platforms (for instance the C1/K1 platforms) we would want that information as well. Could you please have your team verify and get started on putting this information together in the same format as the IR response was presented ?

Previous NHTSA Information Request letter for questions 1 through 6:**CERTIFIED MAIL**
RETURN RECEIPT REQUESTED

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

NVS-213phk
PE04-080

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 a Preliminary Evaluation (PE04-040) to investigate allegations of steering knuckle fractures in model year (MY) 2003 and 2004 Hummer H2 vehicles manufactured by General Motors Corporation, and to request certain information.

This office has received four complaints of steering knuckle fractures at the location of the lower ball joint attachment in MY 2003 and 2004 Hummer H2 vehicles. The consumers have all stated that the vehicles were not driven off-road or exposed to other abusive driving conditions. All four complainants allege that the failure caused them to lose control of the vehicle. One consumer crashed into a parked vehicle. Another consumer alleged that the failure caused the vehicle to veer into oncoming traffic and run into a ditch on the opposite side of the road. Three of the four complaints allege that the knuckle failure resulted in wheel separation. A copy of each of the reports is enclosed for your information.

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

- **Subject vehicles:** all MY 2003 and 2004 Hummer H2 vehicles manufactured for ~~sale~~ lease in the United States.

- **Subject component:** all steering knuckles used as original equipment or service parts for MY 2003 through current production Hummer H2 vehicles.
- **GM:** General Motors Corporation, all of their past and present officers and employees, whether assigned to their principal offices or any of their field or other locations,

including all of their divisions, subsidiaries (whether or not incorporated) and affiliated enterprises and all of their headquarters, regional, zone and other offices and their employees, and all agents, contractors, consultants, attorneys and law firms and other persons engaged directly or indirectly (e.g., employee of a consultant) by or under the control of GM (including all business units and persons previously referred to), who are or, in or after January 1, 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:** steering knuckle fracture.
 - **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," "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 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 and model manufactured to date GM, 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 information for this request in a Microsoft Access 2000 table format (or a compatible format). Entitle the table "PRODUCTION DATA." See Enclosure 1, Data Collection Disk, 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 are 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; and,
 - 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 "f" 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 "d" 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 the information for this request in a Microsoft Access 2000 table format (or a compatible format). Entitle the table REQUEST NUMBER TWO. See Enclosure 1, Data Collection Disk, 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.

In addition, for all material responsive to this request, provide copies of the full service histories of each vehicle and copies of all dealer repair records (including all technician comments/notes) related to front suspension service.

5. Provide table of all incidents responsive to Request No. 2 in this submission, and the incidents identified in the complaints enclosed with this letter, showing GM's assessment of the causes of each. Provide this information by VIN, date of incident, alleged cause, GM's assessed cause, and the basis for GM's assessment (e.g., field investigation, examination/analysis of returned parts, service records, examination of photographs or reports, etc.).
6. 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. Whether the vehicle was towed to the dealer for the repair (y/n);
- k. Concern stated by customer; and
- l. Comment, if any, by dealer/technician relating to claim and/or repair.

Provide the information for this request in a Microsoft Access 2000 table format (or a compatible format). Entitle the table WARRANTY DATA. See Enclosure 1, Data Collection Disk, for a pre-formatted table that provides further details regarding this submission.

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 February 7, 2005. Please refer to PE04-080 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 L. 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, 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 Peter Kivett of my staff at (202) 366-6178.

Sincerely,

Jeffrey L. Quandt, Chief
Vehicle Control Division
Office of Defects Investigation

Enclosure 1, One CD ROM titled Data Collection Disc containing three files
Enclosure 2, Vehicle Owners Questionnaires No(s) 8022961, 10045134, 10082603 and 10099676

NHTSA:NVS:ODI
NVS- 213PKivett:vrij:66178:12/14/04
cc:
NVS-200 Chron
NVS-213 Chron
Document:/I:121:\PKivett:\PE04-080 IR letter

GM671 Supplement 3
PE04-080

ATTACHMENT "1"