



**GENERAL MOTORS NORTH AMERICA**  
**Structure & Safety Integration**

RECEIVED  
 NVS-210

March 9, 2005

2005 MAR 11 P 1:26

Thomas Z. Cooper, Chief  
 Vehicle Integrity Division  
 Office of Defects Investigation  
 NHTSA Safety Assurance  
 Room #5328  
 400 Seventh Street, S.W.  
 Washington, D.C. 20590

OFFICE OF DEFECT  
 INVESTIGATION

GM-573

NVS-212-pco  
 PE04-081

Dear Mr. Cooper:

This letter is General Motors (GM) response to your peer review information request, dated January 19, 2005, regarding alleged inadvertent side-impact/curtain airbag deployment in certain 2001-2003 MY VW Jetta, Golf, and GT1 vehicles. Per conversations with you, it was decided that GM would provide information on 2001-2003 MY Saturn L-series and 2003 MY Saturn Ion vehicles equipped with side-impact/curtain airbags for a comparative assessment.

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. If there are multiple side air bag system designs or versions for a given subject peer vehicle, please identify under section "a." Separately, for each model subject vehicle manufactured to date by GM, state the following:
  - a. Vehicle identification number (VIN);
  - b. Make;
  - c. Model;
  - d. Model Year;
  - e. Airbag system model version (if more than one);
  - f. Date of manufacture;
  - g. Date warranty coverage commenced; and
  - h. 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."

GM is providing the number of subject peer vehicles equipped with side-impact/curtain airbags produced for sale or lease in the United States by make, model, and model year in Table 1 below.

MAKE/MODEL	2001MY	2002MY	2003MY	TOTAL
Saturn LS (sedan)	16,435	84,988	70,833	172,234
Saturn LW (wagon)	3,220	11,273	7,251	21,744
Saturn Ion sedan	N/A	N/A	1,638	1,638
Saturn Ion coupe	N/A	N/A	1,005	1,005
Total				196,521

TABLE 1: SUBJECT PEER VEHICLE PRODUCTION

N/A NOT APPLICABLE



In response to 1e "Airbag system model version (if more than one)", the airbag system model version for the peer subject vehicles is a head curtain side air bag that releases from the roof rail (see Figure 1 below). There are different part numbers for the different models, i.e. Saturn L sedan, Saturn L wagon, Saturn Ion coupe, and Saturn Ion sedan, however, the basic design and operation is the same.



FIGURE 1: 2005 SATURN ION HEAD CURTAIN SIDE AIR BAG WEB INFORMATION

The production information requested in 1a-g (except for 1e) is provided on the CD labeled Attachment 1; refer to the Microsoft Access 2000 file in the folder labeled "Response to Q1." GM is providing the state where the vehicle was originally delivered for sale or lease for 1h. 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.

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 vehicle, property damage claims, consumer complaints, or field reports;
  - d. Property damage claims (including own vehicle); 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 "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). Identify reports that have a duplicate with either other mfg reports/claims or with ODI.

In addition, for items "b" 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 along with any photographs and airbag control module diagnostic result/readout/printout (along with explanation/description). For items f and g, identify the parties to the action, as well as the caption, court, docket number, and date on which the complaint or other document initiating the action was filed.

For subparts 2a-d, Table 2-1 below summarizes records that could relate to the subject condition.

TYPE OF REPORT	COUNT (INCLUDING DUPLICATES)	GM REPORTS	LOCATION OF REPORTS (ATTACHMENT)	NUMBER WITH PROPERTY DAMAGE	NUMBER WITH CRASH	NUMBER WITH INJURIES/ FATALITIES*
Owner Reports	15	15	2A	0	1	1
Field Reports & Technical Assistance System Reports	30	30	2B	0	1	2
Not-In-Suit Claims	0	0	N/A	0	0	0
Subrogation Claims	1	1	2D	0	0	0
Third Party Arbitration Proceedings	0	0	N/A	0	0	0
Product Liability Lawsuits	0	0	N/A	0	0	0
Total (Including Duplicates)	46	46	N/A	0	2	3
Total (Excluding Duplicates)	34	34	N/A	0	1	2

TABLE 2-1: REPORT BREAKDOWN

\*THERE ARE NO REPORTED FATALITIES.  
 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.

SOURCE SYSTEM	LAST DATE GATHERED
Corporate Central File	2/04/2005
Saturn Customer Assistance Center	1/31/2005
Saturn Technical Assistance Center	1/31/2005
Field Information Network Database (FIND)	2/08/2005
Company Vehicle Evaluation Program (CVEP)	2/08/2005
Captured Test Fleet (CTF)	2/08/2005
Early Quality Feedback (EQF)	2/08/2005
Field Product Report Database (FPRD)	2/08/2005
Legal / Employee Self Insured Services (ESIS)	2/08/2005

TABLE 2-2: DATA SOURCES

In response to the additional information requested for items 2b-f, GM is providing copies of the documents related to each item within the scope of Request No. 2. These documents are provided electronically and may be viewed by accessing the "Document" and "Attachment" columns of the summary table; refer to the folder labeled "Response to Q2" on the Attachment 1 CD.

Assessments of some 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 GM. Assessments are otherwise included if recorded in some retrievable form in the case record or as part of an investigation—GM has not attempted to search for other assessments, including those that were not recorded. Many reports lack sufficient information to characterize the incident or to assess causal and contributory factors. Assessments were not found for each report.

3. State, by model and model year, the number and 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.

Provide this information in Microsoft Excel table, or a compatible format, entitled "WARRANTY DATA COUNT."

The regular and extended warranty claims for the subject vehicles, that may be responsive to this request, are summarized by make, model, and model year in Tables 3-1 and 3-2 and provided in the folder labeled "Response to Q3 Warranty Data Count".

Make/Model	2001MY	2002MY	2003MY	Total
Saturn LS (sedan)	12	28	11	49
Saturn LW (wagon)	2	4	0	6
Saturn Ion sedan	N/A	N/A	0	0
Saturn Ion coupe	N/A	N/A	1	1
Total	14	30	11	55

TABLE 3-1: REGULAR WARRANTY DATA COUNT

N/A NOT APPLICABLE

Make/Model	2001MY	2002MY	2003MY	Total
Saturn LS (sedan)	0	2	1	3
Saturn LW (wagon)	0	0	0	0
Saturn Ion sedan	N/A	N/A	0	0
Saturn Ion coupe	N/A	N/A	0	0
Total	0	2	1	3

TABLE 3-2: EXTENDED WARRANTY DATA COUNT

N/A NOT APPLICABLE

The source of the requested information and the last date the search was conducted is tabulated in Table 3-3 below.

SOURCE SYSTEM	LAST DATE GATHERED
GM Saturn Field Product Reporting (FPR-regular and extended warranty)	1/31/2005

TABLE 3-3: DATA SOURCES

4. Describe in detail the search criteria used by GM to identify the claims identified in response to Request No. 3, 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) and if it covers inadvertent side-airbag deployments (without an actual side crash, but sensors did sense a shock pulse). 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 and if it covers inadvertent side-airbag deployments.

The regular and extended warranty data counts provided in response to Request No. 3 were collected by searching for side curtain module part numbers listed in Table 4-1 with the labor codes listed in Table 4-2 and reviewing the comments field, when available.

PART NUMBER	DESCRIPTION
22870778	MODULE ASM-INFL RST RF S/R/L
22872178	MODULE ASM-INFL RST RF S/R/L
22734583	MODULE ASM-INFL RST RF S/R/L
22870781	MODULE ASM-INFL RST RF S/R/L
22872181	MODULE ASM-INFL RST RF S/R/L
22734586	MODULE ASM-INFL RST RF S/R/L
22734584	MODULE ASM-INFL RST RF S/R/L
22870779	MODULE ASM-INFL RST RF S/R/L
22872179	MODULE ASM-INFL RST RF S/R/L
22870780	MODULE ASM-INFL RST RF S/R/L
22872180	MODULE ASM-INFL RST RF S/R/L
22734585	MODULE ASM-INFL RST RF S/R/L
15254185	MODULE ASM-INFL RST RF S/R/L
15254186	MODULE ASM-INFL RST RF S/R/L
15254187	MODULE ASM-INFL RST RF S/R/L
15254188	MODULE ASM-INFL RST RF S/R/L
22828300	MODULE ASM-INFL RST RF S/R/L
22828301	MODULE ASM-INFL RST RF S/R/L
22828302	MODULE ASM-INFL RST RF S/R/L
22828303	MODULE ASM-INFL RST RF S/R/L
22707213	MODULE ASM-INFL RST RF S/R/L
22707214	MODULE ASM-INFL RST RF S/R/L
22713704	MODULE ASM-INFL RST RF S/R/L
22713705	MODULE ASM-INFL RST RF S/R/L
22720444	MODULE ASM-INFL RST RF S/R/L
22720445	MODULE ASM-INFL RST RF S/R/L

TABLE 4-1: PART NUMBERS USED IN WARRANTY SEARCH

LABOR CODES	DESCRIPTION
C8800-C9885	SAFETY BELT AND SUPPLEMENTAL INFLATABLE RESTRAINT SYSTEM
N0000-N9885	ELECTRICAL

TABLE 4-2: LABOR CODES USED IN WARRANTY SEARCH

GM regular warranty policy and MIC extended warranty contracts cover inadvertent side-airbag deployments without an actual side crash. The warranty data system does not contain information to determine if the sensors received a shock pulse. There are no UWC claims for inadvertent airbag deployment because the UWC contracts do not cover any active or passive restraint systems.

GM is providing a spreadsheet with the number of vehicles that are covered by extended warranty service plans by model, model year, and extended warranty plan type. See the folder labeled "Response to Q4", on the Attachment 1CD.

The subject vehicles are covered by a bumper-to-bumper new vehicle limited warranty for three years or 36,000 miles whichever occurs first. This does not include adjustments and normal maintenance items. Many 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 warranty data provided has limited analytical value in analyzing the field performance of a motor vehicle component. The warranty records do not contain sufficient information to establish the condition of the part at the time of the warranty correction; and service personnel may not consistently use the appropriate labor and trouble codes. Warranty numbers represent claims by our dealers for reimbursement for parts and labor costs incurred in performing warranty service for our customers.

5. Provide a table showing the following information concerning the side-impact airbag systems in the subject peer vehicles by model and model year:
- type of side air bag system (thorax, head, curtain or combination thereof);
  - location of each seating position at which a side air bag system is installed;
  - the number of side air bags at each of those seating positions; and
  - bag location (seat mounted, door mounted, etc.)

GM is providing the requested information in Table 5 below.

MODEL YEAR	MAKE/ MODEL	A. TYPE OF SIDE AIRBAG	B. SEATING LOCATION OF AIRBAG	C. NUMBER OF AIRBAGS PER SEATING LOCATION	D. INSTALLATION LOCATION OF AIRBAG
2001-2003	Saturn LS	Curtain airbag	1 <sup>st</sup> and 2 <sup>nd</sup> row outboard seats	1	Roof Rail
2001-2003	Saturn LW	Curtain airbag	1 <sup>st</sup> and 2 <sup>nd</sup> row outboard seats	1	Roof Rail
2003	Saturn Ion Sedan	Curtain airbag	1 <sup>st</sup> and 2 <sup>nd</sup> row outboard seats	1	Roof Rail
2003	Saturn Ion Coupe	Curtain airbag	1 <sup>st</sup> and 2 <sup>nd</sup> row outboard seats	1	Roof Rail

TABLE 5: CURTAIN AIRBAG INFORMATION

6. For each model, model year of the subject peer vehicles, identify the supplier of the side-impact crash sensing system and electronic restraint module. Please provide a complete street address, contact name, and telephone number for each supplier identified.

The supplier of the curtain airbag modules for the models and model years listed in Table 5 is:

Autoliv North America            contact: Mike Macocha (Autoliv Director, GM NAO Business)  
1320 Pacific Drive  
Auburn Hills, MI, 48326  
(248) 475-0474

For the 2001-2003 Saturn LS/LW SDM (Sensing and diagnostic module), the supplier was:

Siemens VDO Automotive    contact: Fred Roth (General Counsel)  
2400 Executive Hills Blvd.  
Auburn Hills, MI 48326  
(248) 209-5696

The supplier for the SIS (Side impact sensor) on the 2001-2003 Saturn LS/LW and the SIS and SDM for the 2003 Saturn Ion was:

Delphi                            contact: Mike McKale (Manager Product Government Affairs)  
5825 Delphi Drive  
Troy, MI 48068-2815  
(248) 813-3362

\* \* \*

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 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 September 1, 1999, 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

Attachments





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

*GM-673*

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

JAN 19 2005

**CERTIFIED MAIL**  
**RETURN RECEIPT REQUESTED**

*Mary Kardell*

Gay Kent  
GM Product Investigation  
Mail Code 480-111-E118 Engineering Bldg  
30200 Mound Road  
Warren, Michigan 48090-9010

NVS-212-pco  
PE04-081

*Original Received*  
*1-27-05*

Dear Ms. Gay Kent:

The Office of Defects Investigation (ODI) of the National Highway Traffic Safety Administration (NHTSA) is conducting an investigation (PE04-081) of alleged inadvertent deployment of side-impact airbag/curtains in certain model year 2001 - 2003 VW Jetta, Golf and GTI vehicles manufactured by Volkswagen of America. For a comparative assessment, we are requesting information concerning certain GM vehicles equipped with side airbags (peer vehicles).

Unless otherwise stated in the text, the following definitions apply to this information request:

- **Subject peer vehicles:** all model year (MY) 2001 - 2003 Buick, Cadillac, Chevrolet, Oldsmobile, Pontiac, Saturn and SAAB vehicles, with curb weight between 2,500 to 3,500 pounds, equipped with both side-impact/curtain airbags (including the combination thorax/head airbag) and manufactured for sale or lease in the United States.
- **Subject condition:** inadvertent deployment (deployment without a physical side impact or crash) of the side-impact/curtains.
- **GM:** General Motor 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 September 1, 1999, were involved in any way with any of the following related to the subject condition in the subject peer vehicles:

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



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

- 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. If there are multiple side air bag system designs or versions for a given subject peer vehicle, please identify under section "e." Separately, for each model subject vehicle manufactured to date by GM, state the following:
  - a. Vehicle identification number (VIN);
  - b. Make;
  - c. Model;
  - d. Model Year;
  - e. Airbag system model version (if more than one),
  - f. Date of manufacture;
  - g. Date warranty coverage commenced; and
  - h. 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."

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 vehicle, property damage claims, consumer complaints, or field reports;
  - d. Property damage claims (including own vehicle); 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 "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). Identify reports that have a duplicate with either other mfg reports/claims or with ODI.

In addition, for items "b" 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 along with any photographs and airbag control module diagnostic result/readout/printout (along with explanation/description). For items f and g, identify the parties to the action, as well as the caption, court, docket number, and date on which the complaint or other document initiating the action was filed.

3. State, by model and model year, the number and 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.

Provide this information in Microsoft Excel table, or a compatible format, entitled "WARRANTY DATA COUNT."

4. Describe in detail the search criteria used by GM to identify the claims identified in response to Request No. 3, 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) and if it covers inadvertent side-airbag deployments (without an actual side crash, but sensors did sense a shock pulse). 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 and if it covers inadvertent side-airbag deployments.
5. Provide a table showing the following information concerning the side-impact airbag systems in the subject peer vehicles by model and model year:
  - a. type of side air bag system (thorax, head, curtain or combination thereof);
  - b. location of each seating position at which a side air bag system is installed;
  - c. the number of side air bags at each of those seating positions; and
  - d. bag location (seat mounted, door mounted, etc.)

6. For each model, model year of the subject peer vehicles, identify the supplier of the side-impact crash sensing system and electronic restraint module. Please provide a complete street address, contact name, and telephone number for each supplier identified.

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 (including color photographs, diagrams and drawings), together with a copy of any confidentiality request, must be submitted to this office by February 21, 2005. Please refer to PB04-081 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 me 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, 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 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 Ong of my staff at (202) 366-0583.

Sincerely,

A handwritten signature in black ink, appearing to read "Thomas Z. Cooper". The signature is fluid and cursive, with a large, sweeping flourish at the end.

Thomas Z. Cooper, Chief  
Vehicle Integrity Division  
Office of Defects Investigation

**GM673**  
**PE04-081**

**ATTACHMENT "1"**