



Date: January 14, 2005

GM-646B (RQ04-010)

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 1 with (1) CD with non Confidential material
And Confidential material removed and sent to the Office
of Chief Counsel



January 14, 2005

Richard Boyd, Chief
Vehicle Control Division
Office of Defects Investigation
NHTSA Safety Assurance
Room #5326
400 Seventh Street, S.W.
Washington, D.C. 20590

GM-846B

NV8-214gtb
RQ04-010

Dear Mr. Boyd:

This letter is General Motors' (GM) response to your information request (IR), dated November 18, 2004, regarding the reason(s) that General Motors excluded 1998 and 1999 model year Sierra and Silverado vehicles from the vehicles included in Campaign 04V-129.

Following a conversation with Mr. Tom Bowman of your staff, it was agreed that the subject vehicles for this inquiry are 1998-2000 model year (MY) Chevrolet Silverado and GMC Sierra vehicles built before October 1, 1999.

Your questions and our corresponding replies are as follows:

Updated Complaint Information for 1998 and 1999 model year Sierra and Silverado vehicles

1. 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 received by General Motors since December 12, 2003, (i.e. this request excludes information regarding the alleged defect that has been previously provided to the Agency) pertaining to:
 - (a) Consumer complaints, including those from fleet operators;
 - (b) Field reports, including dealer field reports;
 - (c) Reports involving an 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) Reports 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;
 - (e) Property damage claims; and
 - (f) Third-party arbitration proceedings where GM is or was a party to the arbitration; and
 - (g) 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 are to be counted as a field report and a consumer complaint).

In addition, for items "c" through "g," 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 "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.

Provide this information in Microsoft Access 2000, or a compatible format, entitled "REQUEST NUMBER ONE, RQ04-010 - 1998-1999 SIERRA-SILVERADO COMPLAINT DATA." Please provide the data in the same Access format that GM used to provide information requested in PE03-049.

General Motors provided ODI with responsive information in the GM response to PE03-049 dated December 12, 2003. Table 1-1 below summarizes records that could relate to the subject condition that GM has received since the information provided in response to PE03-049 was last gathered.

| TYPE OF REPORT | COUNT (INCLUDING DUPLICATES) | GM REPORTS | GM REPORTS CORRESPONDING TO NHTSA REPORTS | LOCATION OF REPORTS (ATTACHMENT) | NUMBER WITH PROPERTY DAMAGE | NUMBER WITH INJURIES/ FATALITIES* |
|---|------------------------------|------------|---|----------------------------------|-----------------------------|-----------------------------------|
| Owner Reports | 340 | 340 | 0 | 1A | 0 | 1 |
| Field Reports and Technical Assistance System Reports | 21 | 21 | 0 | 1B | 0 | 18 |
| Not-in-Suit Claims | 11 | 11 | 0 | 1C | 2 | 12 |
| Subrogation Claims | 4 | 4 | 0 | 1D | 0 | 0 |
| Third Party Arbitration Proceedings | 0 | 0 | 0 | N/A | 0 | 0 |
| Product Liability Lawsuits | 0 | 0 | 0 | N/A | 0 | 0 |
| Total (Including Duplicates) | 376 | 376 | 0 | N/A | 2 | 32 |
| Total (Excluding Duplicates) | 367 | 367 | 0 | N/A | 2 | 23 |

TABLE 1-1: REPORT BREAKDOWN

N/A - NOT APPLICABLE

* GM IS NOT AWARE OF ANY FATALITIES RELATED TO THE SUBJECT CONDITION AND THE SUBJECT VEHICLES.

The sources of the requested information and the last date the searches were conducted are tabulated in Table 1-2 below.

| Source System | Last Date Gathered |
|---|--------------------|
| Corporate Central File | 12/01/2004 |
| Customer Assistance Center | 12/03/2004 |
| Technical Assistance Center | 12/03/2004 |
| Field Information Network Database (FIND) | 11/24/2004 |
| Company Vehicle Evaluation Program (CVEP) | 11/24/2004 |
| Captured Test Fleet (CTF) | 11/24/2004 |
| Early Quality Feedback (EQF) | 12/09/2004 |
| Field Product Report Database (FPRD) | 11/24/2004 |
| Legal / Employee Self Insured Services (ESIS) | 12/13/2004 |

TABLE 1-2: DATA SOURCES

2. Separately, for each item (complaint, report, claim, notice, or matter) within the scope of the response to Request No. 1, state the following information:
- (a) GM's file number or other identifier used;
 - (b) The category of the item, as identified in Request No. 1 (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 property damage is alleged;
 - (j) Number of alleged injuries, if any; and
 - (k) Number of alleged fatalities, if any.

Provide this information in Microsoft Access 2000, or a compatible format, entitled "REQUEST NUMBER TWO, RQ04-010-1998-1999 SIERRA-SILVERADO COMPLAINT DETAILS DATA." Please provide the data in the same Access format that GM used to provide information requested in PE03-049.

The requested information is provided on the Attachment 1 CD; refer to the Microsoft Access 2000 file in the folder labeled "REQUEST NUMBER TWO, RQ04-010-1998-1999 SIERRA-SILVERADO COMPLAINT DETAILS DATA."

3. Produce copies of all documents related to each item within the scope of Request No. 1. 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 1 are provided in the attachments listed in Table 1-1 on the Attachment 1 CD. GM has organized the records by the GM file number within each attachment.

4. 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 "REQUEST NUMBER FOUR, RQ04-010 - 1996-1999 SIERRA-SILVERADO WARRANTY DATA." Please provide the data in the same Access format that GM used to provide information requested in PE03-049.

GM's response to PE03-049 dated December 12, 2003, contained the regular and extended warranty claim information for the subject vehicles as of November 12, 2003. The 4,786 regular and 250 extended warranty claims, received after November 12, 2003, for the subject vehicles are summarized below in Tables 4A and 4B.

Regular Warranty Claims for Cable Replacement (Labor Codes B5750 & B5751)

| MODEL | 1996MY | 1998MY | 2000MY | TOTAL |
|---------------------|--------|--------|--------|-------|
| Chevrolet Silverado | 116 | 1,886 | 1,762 | 3,744 |
| GMC Sierra | 44 | 627 | 471 | 1,042 |
| Total | 160 | 2,393 | 2,233 | 4,786 |

TABLE 4A

Extended Warranty Claims for Cable Replacement (Labor Codes B5750 & B5751)

| MODEL | 1996MY | 1998MY | 2000MY | TOTAL |
|---------------------|--------|--------|--------|-------|
| Chevrolet Silverado | 15 | 104 | 65 | 187 |
| GMC Sierra | 6 | 29 | 28 | 63 |
| Total | 21 | 133 | 96 | 250 |

TABLE 4B

The total number of warranty claims does not represent the total number of broken cables that have been replaced. Analysis of the warranty data indicates that dealers frequently replace both cables when only one cable has broken.

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 November 23, 2004.

A summary of warranty claims that may relate to the subject condition is provided on the Attachment 1 CD; refer to the Microsoft Access 2000 entitled "REQUEST NUMBER FOUR, RQ04-010 - 1996-1999 SIERRA-SILVERADO WARRANTY DATA."

GM's warranty database does not contain the following information: vehicle owner's name or telephone number, replacement part number description, or customer concern statement. GM is providing a field labeled "Verbatim Text" in response to request 6K (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: repair dealer name or code, trouble code, trouble code description, part number, or verbatim.

The UWC does not provide extended warranty coverage for tailgate support cables; therefore there are no associated claims for tailgate support cable replacement.

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. Describe in detail the search criteria used by GM to identify the claims identified in response to Request No. 4, 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) 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 for the following labor codes and trouble codes. The MIC extended warranty data was collected by searching only for the labor codes.

| LABOR CODE | DESCRIPTION: |
|------------|---|
| B5750 | Support, Tailgate Cable - Right - Replace |
| B5751 | Support, Tailgate Cable - Left - Replace |

| TROUBLE CODE | DESCRIPTION: |
|--------------|-------------------------|
| 1D | Broken |
| 1J | Collapsed |
| 1K | Cracked |
| 1L | Cut |
| 2G | Improperly Cut |
| 4D | Sheared |
| 6C | Component - Inoperative |

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 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.

6. 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 PE03-048 dated December 12, 2003 contained copies of service, warranty and other documents that relate to, or may relate to the subject condition in the subject vehicles.

GM is not planning to issue any communications within in the next 120 days related to the subject condition in the subject vehicles.

7. Describe all of the significant differences between
 - (a) 1998 and 1999 model year Sierra and Silverado vehicles (i.e., vehicles equipped with identical or similar tailgate support cables as 2000-2004 Sierra and Silverado vehicles but which were not included in Campaign 04V-129) and
 - (b) model year 2000 through 2004 Sierra and Silverado vehicles manufactured between October 1999 and October 2003 (i.e., vehicles that are the subject of Campaign 04V-129).

For each of the differences identified, provide GM's assessment of the effects that these differences are expected to have on:

- (1) tailgate support cable integrity (e.g. endurance and fatigue properties, environmental resistance properties, in-use reliability, forecasted useful life, etc.);
- (2) the consequences of one or both tailgate cables breaking (e.g. the magnitude of the potential door drop (displacement) and/or other vehicle design considerations that could mitigate the risk or severity of injuries); and
- (3) indications or warnings that a product failure (breakage) was imminent.

Where possible, support these assessments with quantified data and provide copies of the supporting documentation.

General Motors manufactured the GMT400 version of Sierra and Silverado vehicles in the 1998 - 2000 model years. GM manufactured the GMT800 version of Sierra and Silverado vehicles in the 1999 - 2004 model years. Consequently, the 1998 model year Sierra and Silverado vehicles include only the GMT400 version. The 1999 and 2000 model year Sierra and Silverado vehicles include both the GMT400 and the GMT800 version. The 2001 - 2004 model year Sierra and Silverado vehicles include only the GMT800 version because

production of the GMT400 version ended at the conclusion of the 2000 model year for the US market.

There are several differences between a GMT400 and a GMT800 Sierra and Silverado these include the exterior (body) design, interior design, power train, payload capacity and brake system. The differences do not significantly affect tailgate support cable integrity or indications that a tailgate support cable breakage is imminent. However, the difference in exterior design does affect the magnitude of displacement of the tailgate as a consequence of both tailgate cables breaking.

The displacement of the tailgate drop to the rear bumper as a result of both of the tailgate support cables breaking is significantly different between a GMT400 and a GMT800 Sierra and Silverado. GM Service Operations measured the angular position of the tailgate from the open position with the support cables connected and the position of the tailgate with the cable disconnected. The GMT800 tailgate moves a total of 10 degrees (+2 degrees to -8 degrees from horizontal) before coming to rest on the top of the rear bumper. This angular displacement equates to a vertical distance of only 1.17 inches at the point the tailgate rests on the bumper. The GMT400 tailgate moves a total of 4.6 degrees (+3.4 degrees to -1.1 degrees from horizontal) before coming to rest on the top of the rear bumper. This angular displacement equates to a vertical distance of only 0.62 inches at the point the tailgate rests on the bumper. The GMT400 unsupported tailgate is basically resting on the rear bumper in the horizontal position. Thus, the displacement of the tailgate resulting from broken tailgate support cables on the GMT400 is significantly lower than on the GMT800.

The GMT800 started production with a tailgate support cable design similar to the design of the GMT400 support cable. The similarities and differences in the design of the GMT400 and GMT800 tailgate support cables are listed below.

Similarities

- Identical cable material and construction(7 x 19 Commercial Grade Galvanized).
- Identical sheathing material specification(GMP E/P .033 Cover-Alloy Black Weather Resistant).
- One round and one elongated crimped end fittings.
- Same Cable Assembly Supplier.

Differences:

- GMT800 had epoxy sealant added to each end of the bare strands of the cables to deter moisture from entering the galvanized metal strands.
- GMT800 End Fittings are offset 35 degrees from each other.
- GMT800 Shrink Wrap added to the box side eyelet to prevent rattle and paint mutilations.
- GMT800 Latch End Fitting longer (14mm) and offset (12mm)
- GMT800 Shrink Wrap was extended over the eyelet clip to improve clip retention.
- GMT800 Eyelet Retainer Clip improved (ergonomics and function).
- GMT800 added a frocked washer to the latch eyelet and reduced hole size to improve a rattle condition.
- GMT400 Cable Assembly is shipped directly to assembly plants. The GMT800 Cable is shipped to Delphi; bolted to the latch; then shipped to vehicle assembly plants as an assembly.

The GMT400 and GMT800 tailgate cable assemblies were initially supplied by the same source Cable Manufacturers of America (CMA). The GMT400 cables were sent directly from CMA to GM vehicle assembly plants. Cables for use on the GMT800 were first shipped to a Tier 1 supplier (Delphi) where they were assembled to the latch, then shipped to GM vehicle assembly plants. In September 2001, the tailgate cable assembly supplier was changed from CMA to Shanghai Delphi Automotive Door Latch & Security Systems Inc. (SDADS), a subsidiary of Delphi Automotive Systems.

The same source supplied the galvanized steel cable (wire) for the GMT400 and the GMT800 vehicles. Teknor Apex supplied the Thermal Plastic Elastomer (TPE/TPO) material used in the sheathing covering the galvanized steel cable. Teknor Apex has indicated that the same TPE/TPO material was supplied for the 1998-2004 model year GMT400 and GMT800 Sierra and Silverado vehicles. However, chemical analysis of the TPE/TPO material conducted on behalf of General Motors after the December 13, 2003 response to PE03-049 indicates there is a significant difference in the composition of the sheathing material used on the cables installed in vehicles produced prior to October 1999. This difference in TPE/TPO material composition and the effect on tailgate support cable integrity is explained in detail in response to item 9.

8. Describe the rationale (list and explain the reasons) that led GM to exclude model year 1998 and 1999 Sierra and Silverado vehicles from receiving the same remedy as vehicles manufactured between October 1999 and October 2003 (i.e. vehicles that are the subject of Campaign 04V-129).

The 1998 - 1999 Sierra and Silverado vehicles were not included in Campaign 04V-129 because owner complaints and GM warranty information indicated that tailgate cable breakage occurred at a lower count and lower rate than the vehicles that are the subject of Campaign 04V-129, as indicated in the RQ04-010 ODI resume.

Warranty data provided in response to PE03-049 showed a significant increase in warranty claims for Sierra and Silverado vehicles built after October 1999.

The warranty rate of incidents per thousand vehicles (IPTV) for the 1998 - 1999 Sierra and Silverado vehicles is in the 10-15 IPTV range at 3 years exposure. The warranty data shows an IPTV increase to above 90 IPTV at 3 years exposure for vehicles built after October 1999. GM decided that the vehicles built after October 1, 1999 should be the subject of Campaign 04V-129.

Subsequent investigation, described in detail in the responses to items 7, 9 and 10, confirms the validity of GM's decision to recall vehicles built after October 1999.

9. 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.

The information listed in Table 9-1 below is a summary of "actions" performed by GM and on behalf of GM, regarding the subject condition on the subject vehicles. Documents and

additional supporting information is included on the Attachment 1 and Attachment 1 Confidential CDs.

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| <p>Action Title: Endgate Cable material/Geometry Comparison Start Date: 12/2003 End Date: 01/2004 Engineering Group: GM Engineering Attachment 9A Response to Q9 Description: Documents Endgate Cable Material/Geometry for comparison purposes. Summary of Action: See document for summary information.</p> |
| <p>Action Title: Endgate Cable Analysis - Field Return Parts Summary Start Date: 01/2004 End Date: 12/2004 Engineering Group: GM Engineering Attachment 9B Response to Q9 Description: Summary sheet of field return parts information. Summary of Action: See report for results</p> |
| <p>Action Title: GM Evaluation Report PER/Report 13825 Start Date: 03/23/2004 End Date: 03/24/2004 Engineering Group: GMNA Materials Laboratory - Pontiac Confidential Attachment 9C Response to Q9 Description: Document Condition of tailgate support cable samples. Macro Analysis, Photography, and plastic coating removal. Summary of Action: See macro observations and attached photographs for documentation of condition of tailgate support cables.</p> |
| <p>Action Title: GM Evaluation Report PER/Report 14062 Start Date: 04/05/2004 End Date: 05/05/2004 Engineering Group: Confidential Attachment 9D Response to Q9 Description: Comparatively examine and evaluate the endgate cables. Note any differences between the vintage cables and two SPO new cables that may be relevant in the determination of potential corrosion induced fractures. Summary of Action: Evaluation of the test results produced three significant characteristics that could contribute to differences in corrosion rates. 1. The amount of oil on the wires and presence of a series of antioxidant peaks (phenols) 2. The cover fit to the cable wires. 3. The chemistry of the cover and the amount of antioxidant additive in the cover. A number of other material tests were performed. Their results did not reveal significant differences. See the results section of the report for an explanation of all testing and results.</p> |
| <p>Action Title: GM R & D Chemical & Environmental Sciences Lab Elemental Analysis Certificate No 2004-00585. Start Date: 06/02/2004 End Date: 06/09/2004 Engineering Group: GM Chemical & Environmental Sciences Lab Confidential Attachment 9E Response to Q9 Description: Elemental analysis of the sheathing covers on tailgate support cables. Summary of Action: See report for results.</p> |
| <p>Action Title: GM R & D Chemical & Environmental Sciences Lab XPS Analysis Certificate No 2004-00611. Start Date: 06/04/2004 End Date: 06/09/2004 Engineering Group: GM Chemical & Environmental Sciences Lab Confidential Attachment 9F Response to Q9 Description: X-ray photoelectron spectroscopy comparing galvanize-wire/TPE/TPO interfaces on cables. Summary of Action: See report for results.</p> |

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| <p>Action Title: GM R & D Chemical & Environmental Sciences Lab Micro Energy-Dispersive X-ray Fluorescence Spectroscopy Analysis Certificate No 2004-00824. Start Date: 06/09/2004 End Date: 06/09/2004 Engineering Group: GM Chemical & Environmental Sciences Lab Confidential Attachment 9G Response to Q9 Description: Micro energy-dispersive X-ray fluorescence spectroscopy elemental analysis of TPE/TPO coatings on liftgate cables. Summary of Action: See report for results</p> |
| <p>Action Title: GM R & D Chemical & Environmental Sciences Lab X-ray Photoelectron Spectroscopy Elemental Analysis Certificate No 2004-00832. Start Date: 06/10/2004 End Date: 06/11/2004 Engineering Group: GM Chemical & Environmental Sciences Lab Confidential Attachment 9H Response to Q9 Description: X-ray photoelectron spectroscopy elemental analysis to determine if there are any surface contaminants or lubes on the surface of the galvanized steel cables. Summary of Action: See report for results</p> |
| <p>Action Title: GM R & D Chemical & Environmental Sciences Lab Gas Chromatography-Mass Spectrometry Analysis Certificate No 2004-00851. Start Date: 06/15/2004 End Date: 06/22/2004 Engineering Group: GM Chemical & Environmental Sciences Lab Confidential Attachment 9I Response to Q9 Description: Gas chromatography-mass spectrometry additive analysis of TPE/TPO coatings on cables. Summary of Action: See report for results</p> |
| <p>Action Title: GM/Delphi - Teknor Apex Meeting Agenda Start Date: 07/20/2004 End Date: 07/20/2004 Engineering Group: GM Engineering, GM Supplier Quality, Delphi and Teknor Apex Attachment 9J Response to Q9 Description: Meeting minutes for a meeting on July 20, 2004 between GM/Delphi and Teknor Apex to discuss TPE/TPO material. Summary of Action: See report for results</p> |
| <p>Action Title: Delphi GMT800 Versamount Tailgate Cable Extrusion DOE Summary. Start Date: 09/07/2004 End Date: 09/10/2004 Engineering Group: Delphi Automotive Systems Attachment 9K Response to Q9 Description: Summary presentation to identify the extrusion process factors (and/or interactions) that have the greatest influence on TPE/TPO resin penetration. Delphi conducted DOE on current cable extrusion process in China Summary of Action: The extrusion process factors (and interference space) studied did not produce a high level of resin penetration. No interactions were found to be significant. See presentation summary document for specific results</p> |
| <p>Action Title: Rheological Measurement of Polymer Melts Test Report: R-7443, conducted at Datapoint Labs on behalf of GM. Start Date: 09/13/2004 End Date: 09/15/2004 Engineering Group: GM R & D Chemical & Environmental Sciences Lab & Datapoint Labs Attachment 9L Response to Q9 Description: ASTM D 4440-95a Rheological Measurement of complex viscosity of Polymer Melts. Summary of Action: Data confirms that cables samples from vehicles built after the significant warranty rate increase and included in Campaign 04V-129 exhibit higher complex viscosity with poor TPE/TPO resin penetration into and around the cable strands. Poor TPE resin penetration leaves voids in the cable spaces and the TPE/TPO cable interfaces. These voids allow moisture to wick within the enclosed cables strands, allowing the cable to oxidize and eventually fracture</p> |

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| <p>Action Title: E-mail GMT400 & GMT800 & GMT325 endgate opening angles Start Date: 12/18/2004 End Date: 12/16/2004 Engineering Group: GM Engineering and GM Service Operations Attachment GM Response to Q9. Description: E-mail summarizing the displacement angles of the tailgate with cables disconnected on GMT400, GMT800 and GMT325. Summary of Action: See report for results</p> |
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TABLE 9-1

10. Furnish General Motors' assessment of the alleged defect in the subject component, including:

- (a) The failure mechanism(s);
- (b) The failure mode(s);
- (c) The risk to motor vehicle safety that posed (d) 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.

The information regarding warnings to the operator and other persons that the subject component was malfunctioning provided in the December 13, 2003 response to PE03-049 also applies to this response. In addition to the information provided in the GM response to PE03-049 regarding failure mechanisms and failure modes, GM has identified a material change that significantly contributes to moisture wicking within the cables leading to oxidation and eventual fracture.

The GM warranty data documenting a substantial increase in tailgate support cable replacement for vehicles built after October 1999 indicates that a material or process change was made by the manufacturer of tailgate support cables. GM addressed the warranty increase with the cable suppliers. Both cable assembly manufacturers claim they made no changes to the material, assembly or extrusion processes. Teknor Apex (the supplier of the TPE/TPO material) claims they made no formulation changes that would affect cable oxidation.

General Motors continued to investigate, analyze, test and evaluate failed tailgate support cables since responding to PE03-049. The resulting data confirms that the TPE/TPO material supplied by Teknor Apex, was different on the cables installed in vehicles produced prior to October 1999. A change in the TPE/TPO material is also strongly indicated by the significant increase in warranty claims for Sierra and Silverado vehicles built after October 1999. General Motors is meeting with Delphi, CMA and Teknor Apex the week of January 17, 2005 to specifically address the change in TPE/TPO material indicated by the warranty and test data.

Datapoint Labs in Ithaca, New York performed dynamic mechanical rheology testing on tailgate support cables to measure complex viscosity as a function of temperature and frequency. These measurements confirmed a material change in the TPE/TPO used in the cable sheathing. The data shows that complex viscosity is lower in samples with complete resin penetration into and around the cable strands. The data also indicates that complex viscosity is higher in cable samples with incomplete TPE/TPO resin penetration into and around the wire cable strands. Incomplete TPE/TPO resin penetration leaves voids in the interstitial cable spaces and the cable TPE/TPO interface. These voids allow moisture to wick within the enclosed cables strands, thus allowing the galvanized cable to oxidize, and

eventually fracture. The cables with higher resin penetration do not have these voids. Cables with no voids prevent moisture from wicking along the cable and, therefore, inhibit corrosion.

The test data and lower count and rate of tailgate cable breakage in the subject vehicles (vehicles produced prior to October 1999) suggests that the cables installed in these vehicles were manufactured before the change in TPE/TPO material. Cables manufactured before the change in TPE/TPO material have a higher resin penetration and fewer voids that reduce oxidation and eventual fracture. The vehicles included in Campaign D4V-129 were manufactured after October 1, 1999. The test data supported by the warranty data indicates the cables installed in the campaign vehicles were manufactured with the changed TPE/TPO material resulting in incomplete resin penetration, voids allowing oxidation and eventual fracture.

GM's continuing investigation confirms that there are significant differences in: (1) the tailgate support cable material composition, (2) GMT400 and GMT800 vehicle design, and (3) lower warranty claim rate for the subject vehicles, between the 1998-2000 model year Sierra and Silverado vehicles produced prior to October 1999 and the recalled vehicles.

Based on these differences, described in detail in the responses to items 7, 8, and 9, GM continues to believe that its decision to recall vehicles produced after October 1999 was appropriate.

* * *

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 1997, 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**

Gen-646 B

400 Seventh Street, S.W.
Washington, D.C. 20580

Mark Deacon

*11-29-04
Original Received*

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

NOV 18 2004

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

NVS-214gtb
RQ04-010

Dear Ms. Kent:

This letter is to inform you that the Office of Defects Investigation (ODI) of the National Highway Traffic Safety Administration (NHTSA) is investigating the reason(s) that General Motors excluded 1998 and 1999 model year Sierra and Silverado vehicles from the vehicles addressed in Campaign 04V-129.

General Motors' Campaign 04V-129 offers replacement tailgate support cables for certain 2000 - 2004 model year Sierras and Silverados and for certain 2002 - 2004 model year Chevrolet Avalanche and Cadillac Escalade EXT vehicles. GM has not offered a Campaign remedy or other support for C/K vehicle models manufactured prior to October 1999 although ODI believes that these vehicles were equipped with identical or similar tailgate support cables as the vehicles included in the Campaign.

ODI has reviewed the information that General Motors ("GM") provided to the Agency on December 12, 2003, and notes that General Motors has identified 43 complaints and ten reports of injury incidents resulting in eleven injuries associated with broken tailgate support cable(s) in 1998 and 1999 model year Sierra and Silverado vehicles. A summary of the injury incidents that General Motors identified to the Agency in December 2003 is provided as Attachment A.

In addition to the information that General Motors has provided, ODI has received 30 complaints and seven (non-duplicate) reports of injury incidents associated with broken tailgate support cable(s) in 1998 and 1999 model year Sierra and Silverado vehicles. A summary of the injury incidents reported to the Office of Defects Investigation (ODI) is provided as Attachment B.



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888-DASH-2-DOT
888-327-4236

In general, the injuries are alleged to have occurred when individuals who were seated or standing on the tailgate while loading or unloading the vehicle were jolted and/or dropped unexpectedly when the tailgate cable(s) broke.

During the course of ODI's investigation EA04-005, certain owners alleged that the tailgate had partially or completely separated from the vehicle while being driven after one or both of the tailgate support cables had broken. ODI is aware of one incident (VOQ 10081006, VIN 1GCEK14T4XEXXXXXX) relevant to RQ04-010 in which a partial (one side) tailgate separation is alleged to have occurred in a 1999 Silverado. Attachment C provides some additional information about this report.

Although ODI is not aware of any injuries associated with a tailgate partially or completely separating from a vehicle, ODI is concerned that a partially or completely separated tailgate could pose an unexpected road hazard to trailing vehicles or to other vehicles in the proximity of the separation event.

The purpose of this letter is to request certain information from General Motors about the tailgate support cables installed in model year 1998 and 1999 Sierra and Silverado vehicles.

ODI will be issuing a separate request for similar information pertaining to model years 1998-2004 Sonoma and S10 model vehicles since these vehicles were also equipped with tailgate support cables made of materials and construction similar to the tailgate support cables installed in model year 2000-2004 Sierras and Silverados.

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

- **Subject vehicles:** all 1998 and 1999 model year Sierra and Silverado vehicles equipped with a tailgate support cables similar in material and construction to the tailgate cables installed in General Motors model years 2000-2004 Sierra and Silverado vehicles and model years 2002-2004 Avalanche and Cadillac Escalade EXT vehicles which are the subject of General Motors' Campaign 04V-129.
- **Subject component(s):** tailgate support cable(s).
- **General Motors Corporation ("GM"):** 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 1997, 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:** One or both tailgate support cables breaking.
- **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 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.

To the extent possible, provide the requested information in Microsoft Access 2000 electronic format.

Note: GM provided ODI with owner complaint, injury, fatality, and warranty information and supporting details on December 12, 2003. The following Requests (Nos. 1-5) require GM to provide only incremental complaint, injury, fatality, and warranty information (i.e., information that GM has received since December 12, 2003, and/or relevant information that GM has not previously provided to the Agency).

Updated Complaint Information for 1998 and 1999 model year Sierra and Silverado vehicles -

1. 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 received by General Motors since December 12, 2003, (i.e. this request excludes information regarding the alleged defect that has been previously provided to the Agency) pertaining to:
 - (a) Consumer complaints, including those from fleet operators;
 - (b) Field reports, including dealer field reports;
 - (c) Reports involving an 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) Reports 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;
 - (e) Property damage claims; and
 - (f) Third-party arbitration proceedings where GM is or was a party to the arbitration; and
 - (g) 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 are to be counted as a field report and a consumer complaint).

In addition, for items "c" through "g," 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 "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.

Provide this information in Microsoft Access 2000, or a compatible format, entitled "REQUEST NUMBER ONE, RQ04-010 -- 1998-1999 SIERRA-SILVERADO COMPLAINT DATA." Please provide the data in the same Access format that GM used to provide information requested in PE03-049.

2. Separately, for each item (complaint, report, claim, notice, or matter) within the scope of the response to Request No. 1, state the following information:
 - (a) GM's file number or other identifier used;
 - (b) The category of the item, as identified in Request No. 1 (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 property damage is alleged;
 - (j) Number of alleged injuries, if any; and
 - (k) Number of alleged fatalities, if any.

Provide this information in Microsoft Access 2000, or a compatible format, entitled "REQUEST NUMBER TWO, RQ04-010 -- 1998-1999 SIERRA-SILVERADO COMPLAINT DETAILS DATA." Please provide the data in the same Access format that GM used to provide information requested in PE03-049.

3. Produce copies of all documents related to each item within the scope of Request No. 1. Organize the documents separately by category (i.e., consumer complaints, field reports, etc.) and describe the method GM used for organizing the documents.
4. 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 "REQUEST NUMBER FOUR, RQ04-010 – 1998-1999 SIERRA-SILVERADO WARRANTY DATA." Please provide the data in the same Access format that GM used to provide information requested in PE03-049.

5. Describe in detail the search criteria used by GM to identify the claims identified in response to Request No. 4, 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) 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.
6. 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.
7. Describe all of the significant differences between
 - (a) 1998 and 1999 model year Sierra and Silverado vehicles (i.e., vehicles equipped with identical or similar tailgate support cables as 2000-2004 Sierra and Silverado vehicles but which were not included in Campaign 04V-129) and
 - (b) model year 2000 through 2004 Sierra and Silverado vehicles manufactured between October 1999 and October 2003 (i.e., vehicles that are the subject of Campaign 04V-129).

For each of the differences identified, provide GM's assessment of the effects that these differences are expected to have on:

- (1) tailgate support cable integrity (e.g. endurance and fatigue properties, environmental resistance properties, in-use reliability, forecasted useful life, etc.);

- (2) the consequences of one or both tailgate cables breaking (e.g. the magnitude of the potential door drop (displacement) and/or other vehicle design considerations that could mitigate the risk or severity of injuries); and
- (3) indications or warnings that a product failure (breakage) was imminent.

Where possible, support these assessments with quantified data and provide copies of the supporting documentation.

8. Describe the rationale (list and explain the reasons) that led GM to exclude model year 1998 and 1999 Sierra and Silverado vehicles from receiving the same remedy as vehicles manufactured between October 1999 and October 2003 (i.e. vehicles that are the subject of Campaign 04V-129).
9. 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.

10. Furnish General Motors' assessment of the alleged defect in the subject component, including:
 - (a) The failure mechanism(s);
 - (b) The failure mode(s),
 - (c) The risk to motor vehicle safety that posed
 - (d) 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.

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.

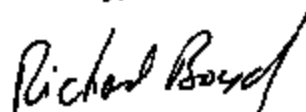
If GM cannot respond to any specific request or subpart(s) thereof, please state the reason why it is unable to do so. If on the basis of attorney-client, attorney work product, or other privilege, GM does not submit one or more requested documents or items of information in response to this information 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 **January 15, 2005**. Please refer to RQ04-010 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) 366-4933 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 (68 Fed. Reg. 44209 et seq; July 28, 2003), 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 Tom Bowman of my staff at (202) 366-6961.

Sincerely,



Richard P. Boyd, Chief
Medium & Heavy Duty Vehicle Division
Office of Defects Investigation

Enclosure 1, Attachments A - C

RQ04-010
Attachment A
Sheet 1 of 1

**Summary of Personal Injuries allegedly caused by
 Tail Gate Dropping unexpectedly due to tailgate support cable breaking in
 1998 and 1999 model year Sierra and Silverado Vehicles.
 General Motors reported these incidents to ODI on
 December 12, 2003 (PE03-049).**

| Model Year | Make | Model | VIN | Incident Date | Date Reported | Injuries |
|--------------|-----------|--------------------|-------------------|---------------|---------------|-----------|
| 1998 | Chevrolet | Silverado Ext 4WD | 1GCEK19R1WRXXXXXX | NA | 10/28/1999 | 1 |
| 1998 | Chevrolet | Silverado Ext 4WD | 1GCEK19R8WEXXXXXX | 11/07/2000 | 11/08/2000 | 1 |
| 1998 | GMC | Sierra Ext Cab 4WD | 1GTEK19RXWRXXXXXX | 02/14/2003 | 02/14/2003 | 1 |
| 1998 | Chevrolet | Silverado Ext 4WD | 2GCEK19R8W1XXXXXX | 12/15/2000 | 01/05/2001 | 1 |
| **1998 | Chevrolet | Silverado Ext 4WD | 2GCEK19R8W1XXXXXX | 04/08/2002 | 05/08/2002 | 1 |
| 1999 | Chevrolet | Silverado Ext 2WD | 1GCEC19TPXZXXXXXX | 08/21/2001 | 11/30/2001 | 1 |
| 1999 | Chevrolet | Silverado Reg 4WD | 1GCEK14T5EXXXXXXX | 06/06/2003 | 08/16/2003 | 1 |
| 1999 | Chevrolet | Silverado Ext 4WD | 1GCGK28UXXZXXXXXX | 06/09/2002 | 06/10/2002 | 1 |
| 1999 | Chevrolet | Silverado Ext 2WD | 2GCEC19T6X1XXXXXX | 10/11/2003 | 10/14/2003 | 1 |
| 1999 | GMC | Sierra Ext Cab 4WD | 2GTEK19TXX1XXXXXX | 10/28/2001 | 10/30/2001 | 2 |
| Total | | | | | | 11 |

To protect the privacy of the consumer, ODI has redacted (deleted) the final six digits of the VINs listed.

**Summary of Personal Injuries reported through VOQ caused by
Tail Gate Dropping Unexpectedly due to tailgate support cable breaking in
1998 and 1999 model year Sierra and Silverado Vehicles**

- Shaded cells indicate reports of personal injuries that ODI has verified through phone interviews.
- ODI has provided complete VIN numbers when the owners have approved the release of VIN information.
- ODI has redacted VINS (last six digits deleted) when the owners have not specifically permitted ODI to release the VIN information.

| VOQ # | Vehicle | Verbatim Consumer Statement from ODI VOQ |
|----------|---|--|
| 10043887 | 1998 Sierra 2GTEK19R3W1X XXXXX | BROKEN TAIL GATE CABLES ON A 98 GMC K 1500 PICKUP. |
| 10062667 | 1999 Silverado 2GCBK19T1X ██████ | MY 1999 CHEV P/U TAILGATE CABLE BROKE CAUSING MINOR INJURY. I NOTICED AN ARTICLE RECALLING 2000-2004 GM'S. MY TRUCK WAS LESS THAN 3 YEARS OLD WHEN THE CABLE FAILED. 1999 GM VEHICLES SHOULD BE INCLUDED IN THE RECALL. |
| 10045457 | 1999 C/K Pick-up 2GTEK19TXX1X XXXXX | SIMULTANEOUSLY BROKEN TAILGATE CABLES RESULTING IN SEVERE PINCHING OF HAND CAUSING SWELLING AND PAIN. |
| 9005863 | 1999 Silverado 1GCBK14V6XEX XXXXX | TAIL GATE CABLE FAILED |
| 10058972 | 1998 C/K Pick-up 2GCBK19R9W1X XXXXX | TAILGATE CABLES BROKE WHILE LOADING FURNITURE ONTO TRUCK. DAMAGED TRUCK BED AND INJURED TWO FAMILY MEMBERS FROM THE CABLES BREAKING UPON LOADING FURNITURE INTO BED OF FAIRLY NEW TRUCK WITH ONLY 30 THOUSAND MILES ON IT. (29,995). |
| 10067781 | 1999 Sierra 2GTEC19V4X ██████ | CORROSION IN TAILGATE RESTRAINT STRAPS CAUSED FAILURE WHILE SITTING ON TAILGATE TO UNLOAD SEWING MACHINE. MINOR INJURY TO PERSON. NO DAMAGE TO SEWING MACHINE. MINOR |

| | | |
|----------|------------------------------|---|
| | | DAMAGE TO TAILGATE. LOOKING FOR REPLACEMENT STRAPS. (G.M. DEALER INSISTS STRAPS CANNOT BE PURCHASED SEPERATELY. PURCHASE OF COMPLETE LATCH ASSEMBLY REQUIRED AT 40 DOLLARS PER SIDE). |
| 10089286 | 1999 Silverado 2GCEK19T4X | THE CONSUMER STATED THAT THE STRAPS WHICH HELD THE TAILGATE IN PLACE BROKE, FORCING THE DRIVER TO FALL TO THE GROUND INJURING HIMSELF. THE OWNER CONTACTED THE MANUFACTURER AND WAS TOLD THAT ONLY THE TRUCKS FROM 2000 TO 2004 WERE BEING RECALLED. HOWEVER, THIS PROBLEM IS OCCURRING IN OTHER MODELS AS WELL. PROVIDE FURTHER DETAILS. |

**Summary of Partial Tailgate Separations reported through VOQ
in 1998 and 1999 model year Sierra and Silverado vehicles
manufactured prior to November, 1999.**

ODI has verified the listed report through a phone interview

**Vehicle
Dynamic**

| VOQ Number | Vehicle | Driving Circumstances |
|-----------------------|--|---|
| 10062597 | 1999 Sierra 1GTEK19T5XE XXXXXX | Driving on country gravel road high speed (partial separation) "...I had one incident of the tail gate falling off ..." |

**GM646B
RQ04-010**

ATTACHMENT "1"

**"GM CONFIDENTIAL" MATERIAL
HAS BEEN REMOVED FROM THIS
ATTACHMENT AND SUPPLIED TO
THE OFFICE OF THE CHIEF
COUNSEL**