



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

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

JUL 14 2005

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Gay Kent, Director
Product Investigations
General Motors Corporation
MAIL CODE 480-111-B15
30200 Mound Road
Warren, MI 48090-9055

NVS-214bby
EA05-005

Dear Ms. Kent:

The Office of Defects Investigation (ODI) is conducting an investigation (EA05-005) of under hood fires resulting from a short circuit in the Speed Control Deactivation Switch (SCDS) in model year (MY) 1995 through 2002 Ford 150, Ford Expedition, and Lincoln Navigator vehicles (excluding vehicles included in Recall 05V-017) manufactured by Ford Motor Company. These fires can occur while the vehicle is parked with the key out of the ignition. As part of our analysis, we are conducting a comparative assessment of other similar vehicles. Therefore, we are requesting information concerning certain General Motors vehicles (peer vehicles).

- **Subject Peer Vehicles:** All MY 1995 through 2002 Chevrolet C/K 1500 vehicles manufactured for sale or lease in the United States.
- **General Motors:** General Motors Corporation, and 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 General Motors (including all business units and persons previously referred to), who are or, in or after 1995, 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



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888-327-4236

- 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.
- **Subject Condition:** Non-Crash, "key off", related engine compartment fire.
 - **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 General Motors, any other data compilations from which information can be obtained, translated if necessary, into a usable form and any other documents. For purposes of this request, any document, which contains any note, comment, addition, deletion, insertion, annotation, or otherwise comprises a non-identical copy of another document shall be treated as a separate document subject to production. In all cases where original and any non-identical copies are not available, "document(s)" also means any identical copies of the original and all non-identical copies thereof. Any document, record, graph, chart, film or photograph originally produced in color must be provided in color. Furnish all documents whether verified by the manufacturer or not. If a document is not in the English language, provide both the original document and an English translation of the document.
 - **Other Terms:** To the extent that they are used in these information requests, the terms "claim," "consumer complaint," "dealer field report," "field report," "fire," "fleet," "good will," "make," "model," "model year," "notice," "property damage," "property damage claim," "rollover," "type," "warranty," "warranty adjustment," and "warranty claim," whether used in singular or in plural form, have the same meaning as found in 49 CFR 579.4.

In order for my staff to evaluate the subject condition in certain Ford F150, Ford Expedition, and Lincoln Navigator vehicles, we are requesting information pertaining to certain General Motors vehicles Pursuant to 49 U.S.C. § 30166, please provide numbered responses to the following information requests. Insofar as General Motors has previously provided a document to ODI, General Motors 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 General Motors' response to each request, identify the source of the information and indicate the last date the information was gathered. If requested information is unavailable, so state and provide a brief explanation. Along with your written response, please provide this information in Microsoft Word 2000, or a compatible format, entitled "IR Response".

1. State, by model and model year the number of subject peer vehicles General Motors has manufactured for sale or lease in the United States. Separately, identify by model and model year how many of the vehicles were built with and without cruise control.

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

2. State, by model and model year, the number of each of the following, received by General Motors, or of which General Motors 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 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 the subject condition in a subject peer vehicle, property damage claims, consumer complaints, or field reports;
 - d. Third-party arbitration proceedings where General Motors is or was a party to the arbitration; and,
 - e. Lawsuits, both pending and closed, in which General Motors is or was a defendant or codefendant

For subparts "a" through "e," state the total number of each item (e.g., consumer complaints, field reports, etc.) that occurred on vehicles built with cruise control and without cruise control separately. Also, identify how many of the items occurred while the ignition was in the off, on, and unknown ignition position and how many of the incidents resulted in damage

to a structure. 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 fire occurred are to be counted as a fire report, a field report and a consumer complaint).

Provide the information for this request in a Microsoft Excel 2000 format (or a compatible format). Entitle the table "Peer Request Number 2 Data". See Enclosure 1, Data Collection Disk, for a pre-formatted table that provides further details regarding this submission.

3. State, by model and model year, a total count for all of the following categories of claims, collectively, that have been paid by General Motors 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.

Separately, state the total number of claims that occurred on vehicles built with cruise control and without cruise control. Also, within each of these categories, identify how many of the claims occurred while the ignition was in the off, on, or unknown ignition position and how many of the incidents resulted in damage to a structure.

Provide the information for this request in a Microsoft Excel 2000 format (or a compatible format). Entitle the table "Peer Request Number 3 Data". See Enclosure 1, Data Collection Disk, for a pre-formatted table that provides further details regarding this submission.

4. Describe in detail the search criteria used by General Motors 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 General Motors 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). Describe any extended warranty coverage option(s) related to the subject condition that General Motors 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.
5. Produce copies of all service, warranty, and other documents that relate to, or may relate to, the subject condition in the subject peer vehicles, that General Motors 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 manufacturer's short name is planning to issue within the next 120 days.

6. Provide copies of any Technical Service Bulletins, Customer Satisfaction Campaigns, or Recall Campaigns related to engine compartment fires on the subject peer vehicles.

This letter is being sent to General Motors 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. General Motors failure to respond promptly and fully to this letter could subject General Motors 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 General Motors 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, General Motors does not submit one or more requested documents or items of information in response to this information request, General Motors 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.

General Motors response to this letter, in duplicate, together with a copy of any confidentiality request, must be submitted to this office by September 02, 2005. Please refer to EA05-005 in General Motors response to this letter. If General Motors finds that it is unable to provide all of the information requested within the time allotted, General Motors must request an extension from me at (202) 366-5207 no later than five business days before the response due date. If General Motors 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 General Motors then has available, even if an extension has been granted.

If General Motors 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, General Motors must submit supporting information together with the materials that are the subject of the confidentiality request, in accordance with 49 CFR Part 512, to the Office of Chief Counsel (NCC-113), National Highway Traffic Safety Administration, Room 5219, 400 Seventh Street, S.W., Washington, D.C. 20590. General Motors 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 Bruce York of my staff at (202) 366-6938.

Sincerely,

A handwritten signature in black ink, appearing to read 'K. DeMeter', with a long horizontal line extending to the right.

Kathleen C. DeMeter, Director
Office of Defects Investigation
Enforcement

Enclosures: One CD ROM titled Data Collection Disc containing three files.