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OFFICE OF DEFECTS INVESTIGATION

December 21, 2005

Richard Boyd, Chief
Medium & Heavy Duty Vehicle Division
Office of Defects Investigation
NHTSA
Room #5328
400 Seventh Street, S.W.
Washington, D.C. 20590

GM-646C
GM-670A

EA05-007
EA05-008

Dear Mr. Boyd:

This letter is General Motors' (GM) response to your request for an update of the GM complaints and field reports regarding alleged breaking of one or both tailgate support cables on:

- EA05-007 1998-2000 Model Year (MY) GMT400 pickup trucks (CK); and 1998-2000 MY GMT800 pickup trucks (CK) built before October 18, 1998, and
- EA05-008 All 1998-2003 MY ST pickup trucks

The GM-646B Supplement 1 response to RQ04-010, dated February 9, 2005, contained the GM complaint and field report information identified in searches of the data sources listed in Table 1-C/K1 below, as of the date indicated.

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 (GVEP)	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-C/K1: DATA SOURCES



The sources for this requested update of the GM-846C complaint and field report information and the last date the update searches were conducted are tabulated in Table 1-C/K2 below.

Source System	Last Date Gathered
Corporate Central File	12/12/2005
Customer Assistance Center	12/12/2005
Technical Assistance Center	12/15/2005
Field Information Network Database (FIND)	12/14/2005
Company Vehicle Evaluation Program (CVEP)	12/13/2005
Captured Test Fleet (CTF)	12/13/2005
Early Quality Feedback (EQF)	12/13/2005
Field Product Report Database (FPRD)	12/14/2005
Legal / Employee Self Insured Services (ESIS)	12/08/2006

TABLE 1-C/K2: DATA SOURCES

The GM-870 response to RQ04-012, dated February 4, 2005, contained the GM complaint and field report information identified in searches of the data sources listed in Table 1-S/T1 below, as of the date indicated.

SOURCE SYSTEM	LAST DATE GATHERED
Corporate Central File	12/08/2004
Customer Assistance Center	12/20/2004
Technical Assistance Center	12/14/2004
Field Information Network Database (FIND)	12/16/2004
Field Product Report Database (FPRD)	12/16/2004
Company Vehicle Evaluation Program (CVEP)	01/03/2005
Captured Test Fleet (CTF)	01/03/2005
Early Quality Feedback (EQF)	01/03/2005
Legal / Employee Self Insured Services (ESIS)	12/07/2004

Table 1-S/T1: Data Sources

The sources for this requested update of the GM-870A complaint and field report information and the last date the update searches were conducted are tabulated in Table 1-S/T2 below.

Source System	Last Date Gathered
Corporate Central File	12/12/2005
Customer Assistance Center	12/12/2005
Technical Assistance Center	12/15/2005
Field Information Network Database (FIND)	12/14/2005
Company Vehicle Evaluation Program (CVEP)	12/13/2005
Captured Test Fleet (CTF)	12/13/2005
Early Quality Feedback (EQF)	12/13/2005
Field Product Report Database (FPRD)	12/14/2005
Legal / Employee Self Insured Services (ESIS)	12/08/2006

TABLE 1-S/T2: DATA SOURCES

The RQ04-010 questions related to GM complaint and field report information were used to provide this update information. The questions and our corresponding replies are as follows:

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.

Table C/K-1A below summarizes the records that could relate to the alleged defect in the EA05-007 subject vehicle population that GM has received between the last date gathered in Table 1-C/K1 and the last date gathered in Table 1-C/K2.

TYPE OF REPORT		CORRESPONDING TO NHTSA REPORTS	NUMBER WITH PROPERTY DAMAGE	NUMBER WITH CRASH	NUMBER WITH INJURIES/ FATALITIES*
Owner Reports	712	7	3	0	19
Field Reports	2	0	0	0	0
Not-In-Suit Claims	9	0	0	0	9
Subrogation Claims	3	0	0	0	0
Third Party Arbitration Proceedings	0	0	0	0	0
Product Liability Lawsuits	0	0	0	0	0
Total Reports (Including Duplicates)	728	7	3	0	28
Total Vehicles with Reports (Unique VIN)	718	7	3	0	21

TABLE GM-1A: UPDATE REPORT BREAKDOWN EA05-007
 * GM HAS NO FATALITY REPORTS

Table S/T-1B below summarizes the records that could relate to the alleged defect in the GM05-008 subject vehicle population that GM has received between the last date gathered in Table 1-S/T1 and the last date gathered in Table 1-S/T2.

TYPE OF REPORT		CORRESPONDING TO NHTSA REPORTS	NUMBER WITH PROPERTY DAMAGE	NUMBER WITH CRASH	NUMBER WITH INJURIES/ FATALITIES*
Owner Reports	454	24	0	0	15
Field Reports	1	0	0	0	0
Not-In-Suit Claims	1	1	0	0	1
Subrogation Claims	1	0	0	0	0
Third Party Arbitration Proceedings	0	0	0	0	0
Product Liability Lawsuits	0	0	0	0	0
Total Reports (Including Duplicates)	457	25	0	0	16
Total Vehicles with Reports (Unique VIN)	455	25	0	0	16

TABLE S/T-1B: UPDATE REPORT BREAKDOWN EA05-008
 * GM HAS NO FATALITY REPORTS

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.

The requested information is provided on the Attachment 1 CD; refer to the Microsoft Access 2000 files in the folder labeled "UPDATE (12/21/05) - REQUEST NUMBER TWO, EA05-007-1998-1999 SIERRA-SILVERADO COMPLAINT DETAILS DATA" and the folder labeled "UPDATE (12/21/05) REQUEST NUMBER TWO, EA05-008-SONOMA AND S-10 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 contained in the Microsoft Access 2000 files in the folder labeled "UPDATE (12/21/05) - REQUEST NUMBER TWO, EA05-007-1998-1999 SIERRA-SILVERADO COMPLAINT DETAILS DATA" and the folder labeled "UPDATE (12/21/05) REQUEST NUMBER TWO, EA05-008-SONOMA AND S-10 COMPLAINT DETAILS DATA" on the Attachment 1 CD.

* * *

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

GM-646C
GM-670A

EA05-007
EA05-008

ATTACHMENT "1"

GM NON-CONFIDENTIAL MATERIAL