



GENERAL MOTORS NORTH AMERICA
Structure & Safety Integration

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OFFICE OF
DEFECTS INVESTIGATION

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

GM-876A

NVS-212cag
PE05-010

Dear Mr. Cooper:

This letter is General Motors (GM) response to your information request (IR), dated March 4, 2005, regarding allegations of inoperative tail lamps in 2000 - 2002 model year Saturn L-series sedans and wagons, manufactured for sale or lease in the United States.

Your questions and our corresponding replies are as follows:

1. State, by model and model year, the number of subject vehicles GM has manufactured for sale or lease in the United States. Separately, for each subject vehicle manufactured to date by GM, state the following:
 - a. Vehicle Identification number (VIN);
 - b. Make;
 - c. Model;
 - d. Classification (sedan, wagon);
 - e. Model Year;
 - f. Date of manufacture;
 - g. Date warranty coverage commenced; and
 - h. The State in the United States where the vehicle was originally sold or leased (or delivered for sale or lease).

Provide the table in Microsoft Access 2000, or a compatible format, entitled "PRODUCTION DATA."

General Motors is providing the number of subject vehicles produced for sale or lease in the United States by model and model year in Table 1 below:

MODEL	2000 MY	2001 MY	2002 MY	TOTAL
Saturn L-series sedan	82,888	79,525	84,952	247,345
Saturn L-series wagon	14,397	9,241	11,269	34,907
TOTAL	97,285	88,766	96,221	282,252

Table 1 Vehicle Production

Product Investigations

Mail Code: 480-111-E18 • 30200 Mound Road • Warren, MI 48090-8010
GMUSA Responses.doc



The production information requested in 1a-1h is provided on the CD in Attachment 1, in the folder labeled Response to Q1; refer to the Microsoft Access 2000 file labeled "PRODUCTION DATA." The GM database that contains Vehicle Identification Number (VIN) information does not include information on the state where an individual vehicle was sold. GM is providing the state where the vehicle was shipped in response to request 1h. For some of the subject vehicles, which have incomplete warranty files, the GM warranty system does not contain a warranty start date or state where the vehicle was shipped and therefore these fields are blank in the Microsoft Access 2000 file.

2. State the number of each of the following, received by GM, or of which GM is otherwise aware, which relate to, or may relate to, the alleged defect in the subject vehicles:

- a. Consumer complaints, including those from fleet operators;
- b. Field reports, including dealer field reports;
- c. Reports involving a crash, injury, or fatality, based on claims against the manufacturer involving a death or injury, notices received by the manufacturer alleging or proving that a death or injury was caused by a possible defect in a subject vehicle, property damage claims, consumer complaints, or field reports;
- d. Property damage claims; and
- e. Third-party arbitration proceedings where GM is or was a party to the arbitration; and
- f. Lawsuits, both pending and closed, in which GM is or was a defendant or codefendant.

For subparts "a" through "c," state the total number of each item (e.g., consumer complaints, field reports, etc.) separately. Multiple incidents involving the same vehicle are to be counted separately. Multiple reports of the same incident are also to be counted separately (i.e., a consumer complaint and a field report involving the same incident in which a crash occurred are to be counted as a crash report, a field report and a consumer complaint).

In addition, for items "d" through "f," provide a summary description of the alleged problem and causal and contributing factors and GM's assessment of the problem, with a summary of the significant underlying facts and evidence. For items "e" and "f," identify the parties to the action, as well as the caption, court, docket number, and date on which the complaint or other document initiating the action was filed.

Table 2-1 below summarizes records that could relate to the subject condition. GM has organized the records by the GM file number within each attachment.

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*	NUMBER WITH CRASH
Owner and Customer Assistance Reports	1385	1370	15	2A	0	0	2
Field Reports and Technical Assistance System Reports	85	85	1	2B	0	0	0
Not-In-Suit Claims	0	0	0	N/A	0	0	0
Subrogation Claims	0	0	0	N/A	0	0	0
Third Party Arbitration Proceedings	0	0	0	N/A	0	0	0
Product Liability Lawsuits	0	0	0	N/A	0	0	0
Total (Including Duplicates)	1471	1455	16	N/A	0	0	2
Total (Excluding Duplicates)	1455	1440	15	N/A	0	0	2

Table 2-1: Report Breakdown

N/A Not Applicable

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

SOURCE SYSTEM	LAST DATE GATHERED
Corporate Central File	03/11/2005
Customer Assistance Center	03/18/2005
Technical Assistance Center	03/18/2005
Field Information Network Database (FIND)	03/21/2005
Company Vehicle Evaluation Program (CVEP)	03/11/2005
Captured Test Fleet (CTF)	03/11/2005
Early Quality Feedback (EQF)	03/11/2005
Field Product Report Database (FPRD)	03/21/2005
Legal / Employee Self Insured Services (ESIS) Product Liability Lawsuits & Claims	03/10/2005

Table 2-2: Data Sources

In response to the additional information requested for items 2c-f, GM is providing copies of the documents related to each item within the scope of Request No. 2. These documents are provided electronically. See the response to Request No. 4.

Assessments of some incidents (from lawsuits and claims) may be attorney work product and/or privileged. Therefore, information and documents provided in this response consist only of non-attorney work product and/or non-privileged material for incidents that have been reported to GM. Assessments are otherwise included if recorded in some retrievable form in the case record or as part of an investigation—GM has not attempted to search for other assessments, including those that were not recorded. Many reports lack sufficient information to characterize the incident or to assess causal and contributory factors. Assessments were not found for each report.

3. Separately, for each item (complaint, report, claim, notice, or matter) within the scope of your response to Request No. 2, state the following information:
- GM's file number or other identifier used;
 - The category of the item, as identified in Request No. 2 (i.e., consumer complaint, field report, etc.);
 - Vehicle owner or fleet name (and fleet contact person), address, and telephone number;
 - Vehicle's VIN;
 - Vehicle's make, model, classification and model year;
 - Vehicle's mileage at time of incident;
 - Incident date;
 - Report or claim date;
 - Whether a crash is alleged;
 - Whether a fire is alleged;
 - Whether property damage is alleged;
 - Number of alleged injuries, if any; and
 - Number of alleged fatalities, if any.

Provide this information in Microsoft Access 2000, or a compatible format, entitled "COMPLAINT DATA".

The requested information is provided on the Attachment 1 CD; refer to the Microsoft Access 2000 file in the folder labeled "REQUEST NUMBER THREE COMPLAINT DETAILS DATA."

4. Produce copies of all documents related to each item within the scope of Request No. 2. Organize the documents separately by category (i.e., consumer complaints, field reports, etc.) and describe the method GM used for organizing the documents.

Copies of the records identified in Item 2 are provided in the attachments listed in Table 2-1 on the Attachment 1 CD. GM has organized the records by the GM file number within each attachment. The records are viewable by accessing the "Document" and "Attachments" columns.

5. State, by model, classification 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 "WARRANTY DATA."

The regular and extended warranty claims for the subject vehicles that may be responsive to this request, are summarized by model, model year, and body type in Table 5-1 and Table 5-2. A summary of these warranty claims is provided on the Attachment 1 CD; refer to the folder labeled "Response to Q5 - WARRANTY DATA".

Many of the VINs have multiple entries for various labor codes. The warranty claims reflect the number of labor operations used by dealers, which is higher than the number of actual visits to dealers for repairs.

GM searched the GM Saturn warranty database, (Saturn FPR), 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 March 24, 2005.

Regular Warranty Claims

MODEL	2000MY	2001MY	2002MY	TOTAL
Saturn L-Series Sedan	24,435	11,624	5,864	42,123
Saturn L-Series Wagon	6,593	3,090	1,905	11,588
Total	31,028	14,914	7,769	53,711

TABLE 5-1

Extended Warranty Claims

MODEL	2000MY	2001MY	2002MY	TOTAL
Saturn L-Series Sedan	8,938	4,300	1,110	14,348
Saturn L-Series Wagon	1,662	743	246	2,650
Total	10,600	5,043	1,355	16,998

TABLE 5-2

The sources of the requested information and the last date the searches were conducted are tabulated in Table 5-3 below.

SOURCE SYSTEM	LAST DATE GATHERED
GM Saturn Field Product Reporting (FPR-Saturn warranty)	03/24/2005
Motors Insurance Corporation (MIC - extended warranty)	03/16/2005
Universal Warranty Corporation (UWC - extended warranty)	03/21/2005

TABLE 5-3

The MIC extended warranty system does not contain the following information: repairing dealer code, vehicle owner information, trouble code, trouble code description, part number, part description or verbatim.

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.

- Describe in detail the search criteria used by GM to identify the claims identified in response to Request No. 5, 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 regular warranty data was collected from the GM Saturn FPR warranty database by searching for one or more of the labor codes listed in Table 6-1 and one or more of the cause codes in Table 6-2 and one or more of the part numbers in Table 6-3. The MIC extended warranty data was collected by searching only for the labor codes listed in Table 6-1. The UWC extended warranty data was collected by searching for the labor code descriptions related to intermittent or inoperative tail lamps.

LABOR CODE	LABOR CODE DESCRIPTION
B9840	STOP, TAIL AND TURN SIGNAL ASSEMBLY REPAIR, RIGHT
B9841	STOP, TAIL AND TURN SIGNAL ASSEMBLY REPAIR, LEFT
N0780	BULBS, STOP, TAIL & TURN LAMP REPLACE, RIGHT
N0781	BULBS, STOP, TAIL & TURN LAMP REPLACE, LEFT
N0995	STOP, TAIL&TURN SIGNAL SOCKET REPLACE, ONE
N0997	STOP, TAIL&TURN SIGNAL SOCKET REPLACE, BOTH
N1580	STOP, TAIL&TURN SIGNAL LAMP REPLACE, RIGHT
N1581	STOP, TAIL&TURN SIGNAL LAMP REPLACE, LEFT
N1720	FUSE - REPLACE
N2440	STOP LAMP SWITCH, REPLACE

TABLE 6-1

CAUSE CODE	DESCRIPTION	CAUSE CODE	DESCRIPTION
C00	CAUSE CODES	E01	BURNED/BURNED OUT
C03	BALANCE/IMBALANCE	E02	CHAFFED/FRAYED
C06	BLOCKED	E03	CONNECTION/PARTIAL CONN
C07	BROKEN/FRACTURED	E04	CORROSION/RUST
C08	BURNED	E05	CROSSED
C11	CASTING IMPREFECTION	E06	CUT/SHEARED
C18	CLEARANCE IMPROPER	E07	GROUNDING
C20	CONNECTION	E08	INTERFERENCE
C21	CONTAMINATION/FOREIGN MAT	E09	MELTED
C29	INOPERATIVE PART	E10	MISROUTED
C34	ENGAGEMENT INADEQUATE	E11	NOT CONNECTED
C42	INTERFERENCE	E12	OPEN
C45	LOOSE/LOOSE PART	E13	OVERCHARGE
C54	NOT CONNECTED	E14	PINCHED
C56	OPEN	E15	SHORT
C73	RESISTANCE	E16	TERMINAL BACKED OUT/CONN
C81	SHORT	E17	TERMINAL BENT
C92	WARP/WAVY/DEFORMED/BOWED	E18	TERMINAL CRIMPED OVER INS
C98	WORN/WEAR	E19	TERMINAL NOT CRIMPED
E00	ELECTRICAL	M04	UNKNOWN

Table 6-2

PART NUMBER	DESCRIPTION
8229397	LAMP ASM-TAIL
90583821	LAMP ASM-TAIL
9229398	LAMP ASM-TAIL
90583822	LAMP ASM-TAIL
22872410	LAMP ASM-TAIL
22881038	LAMP ASM-TAIL
9229399	LAMP ASM-TAIL
90584066	LAMP ASM-TAIL
22872411	LAMP ASM-TAIL
22881039	LAMP ASM-TAIL
9229400	LAMP ASM-TAIL
90584067	LAMP ASM-TAIL

Table 6-3

The majority of claims in the Saturn warranty database have verbatims. Since the search criteria were very broad, each verbatim was reviewed to determine if it was responsive to this investigation.

As stated in response to question 5, many of the VINs have multiple entries for various labor codes. The warranty claims reflect the number of labor operations used by dealers, which is considerably higher than the number of actual visits to dealers for repairs.

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. GM is providing the number of subject vehicles covered by an extended warranty policy in the folder labeled "Response to Q6", on the Attachment 1CD; refer to the file labeled "Extended Warranty".

7. 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.

General Motors is not aware of any service or warranty documents that relate to the subject condition, that GM has issued to dealers, regional or zone offices, field offices, fleet purchasers or other entities.

General Motors has not drafted any communications related to the alleged defect in the subject vehicles to be issued in the next 120 days. The preceding information was collected from GM Service Operations. The data collection was completed on March 24, 2004.

8. 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:
- Action title or identifier;
 - The actual or planned start date;
 - The actual or expected end date;
 - Brief summary of the subject and objective of the action;
 - Engineering group(s)/supplier(s) responsible for designing and for conducting the action; and
 - 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 8-1 below is a summary of "actions" performed by, or for, GM regarding the subject condition in the subject vehicles. To assist General Motors in responding, the supplier of the subject component was asked to provide any responsive information and documentation in their control. The attachments identified in action 8.1 contain the information and documents provided by the supplier. This supplier information was last gathered on April 14, 2005. GM documents and additional supporting information is included on the Attachment 1 and Confidential Attachment 1 CDs. The GM information was last gathered on April 15, 2005.

Action 8.1: PRTS+ Data and Memos - Incident # N100984 Start Date: 08/2000 End Date: 11/12/2001 Engineering Group: GM Confidential Attachment 8A - PRTS document and attached memos Attachment 8B - Schefenacker Test Report TRO1459 Attachment 8C - Schefenacker Test Report TRO1460 Attachment 8D - Schefenacker Test Report TRO1461 Description: Incident Report - Problem Resolution tracking customer complaints and warranty for intermittent or no function wagon tail lamp -left rear of vehicle. Identified root cause non-robust heat staking of circuit plate. Corrective action implemented was improved heat staking process. Summary of Action: Engineering report regarding the condition, diagnosis and improved heat staked circuit board supports, larger tabs on the contact plate and add a rib under the circuit plate.
Action 8.2: PRTS+ Data and Memos - Incident # N101886 Start Date: 03/27/2001 End Date: 10/26/2001 Engineering Group: GM Confidential Attachment 8E - PRTS document and attached memos Description: Incident Report - Problem Resolution tracking customer complaints and warranty for inoperative tail lamp on sedans. Summary of Action: Engineering report regarding the condition, diagnosis and solution.
Action 8.3: TREAD Data Review Panel Summary Evaluation Evaluation Process Start Date: 03/12/2004 End Date: 05/20/2004 Engineering Group: Confidential Attachment 8F - TREAD Data Review Panel Summary Confidential Attachment 8G - TREAD Data Tracking Report Description: The TREAD team verified the TREAD data report. The TREAD Data Review Summary was prepared and reviewed with the TREAD Data Review Panel on 05/20/2005. The TREAD Data Tracking Report was created. Summary of Action: TREAD Data Review Panel Summary and TREAD Data Tracking Report. Verified data is communicated to Engineering.
Action 8.4: TREAD Data Review Panel Presentation Start Date: 9/30/2004 End Date: 9/30/2004 Engineering Group: Confidential Attachment 8H - TREAD Data Review Panel Presentation Description: The TREAD Data Review Summary Presentation reviewed with the TREAD Data Review Panel. Summary of Action: TREAD Data Review Panel Summary Presentation.

Action 8.5: Field Performance Evaluation Investigation of Inoperative brake and/or tail lamps on the subject vehicles. Start Date: 10/22/2004 End Date: TBD, currently open Engineering Group: GM Product Investigations Confidential Attachment 8I - DRAFT FPE Entry Document Confidential Attachment 8J - Investigation Status Review Presentation Attachment 8K - Warranty Claim Technician Comments Description: Field Performance Evaluation Investigation and documentation of inoperative brake and/or tail lamp assemblies on the subject vehicles used to identify effect on vehicle performance, root cause and contributory factors. Summary of Action: The subject condition, FPE investigation, effect on vehicle performance and suspected root causes at the time are documented.
Action 8.6: Failed Parts Return Program Request (Saturn) Start Date: 02/24/2005 End Date: 03/19/2005 Engineering Group: GM Service Parts Operations Attachment 8L - Saturn Returned Parts Request Description: Request by GM Service Parts to initiate a parts return program to acquire tail lamp assemblies for Red "X" study, evaluation and analysis. Summary of Action: The parts return request resulted in 36 returned tail lamp assemblies.
Action 8.7: Visual Inspection and Electrical bench Testing of Returned Tail Lamp Assemblies Start Date: 2/23/2005 End Date: 3/31/2005 Engineering Group: GM Red "X" and Warranty Engineering Attachment 8M - Returned Parts Summary Description: Tail lamp assemblies returned from Saturn dealerships were inspected and tested to evaluate root cause for the warranty replacement. Summary of Action: Returned parts inspection and bench testing summary documentation.
Action 8.8: Warranty Data Analysis Start Date: 03/05/2005 End Date: 08/05/2005 Engineering Group: GM Red "X" and Warranty Engineering Confidential Attachment Folder 8N (5 files) - Warranty Data Description: Warranty claim data summary related to subject condition for the subject vehicles. Summary of Action: Warranty data summary documents.
Action 8.9: Problem Definition Tree Start Date: 03/18/2005 End Date: 03/18/2005 Engineering Group: GM Red "X" and Warranty Engineering Confidential Attachment 8O - Problem Definition Tree Description: The Problem Definition Tree was used to create the Red "X" project statement for reducing warranty for tail lamp replacement on subject vehicles. Summary of Action: Red "X" Project Statement.
Action 8.10: Project Definition Tree Start Date: 03/18/2005 End Date: 03/18/2005 Engineering Group: GM Red "X" and Warranty Engineering Confidential Attachment 8P - Project Definition Tree Description: The Project Definition Tree was used to identify and create the Red "X" 5 Phase for warranty for tail lamp replacement on subject vehicles. Summary of Action: Red "X" 5 Phase Action Plan

Action 8.11: 5-Phase Action Plan Start Date: 03/18/2005 End Date: Continuing in Corrective Action Plan and Implementation stage. Engineering Group: GM Red "X" and Warranty Engineering Attachment 8Q - 5-Phase Action Plan (Interim) Description: Action Plan that identifies, analyzes, plans corrective action and implementation for tail lamp warranty replacement on the subject vehicles. Additional testing is required to identify root cause and corrective action. Summary of Action: 5-Phase Action Plan documentation.
Action 8.12: Saturn L-Series Tail Lamp testing (warranty returned parts) Start Date: 03/17/2005 End Date: TBD (Testing continues) Engineering Group: GM Exterior Product and Process Engineering Center (PPEC) and Reitter & Schefenacker, USA LP (Lighting Supplier). Attachment 8R - Schefenacker Test Report TR2829 Description: Testing to identify and duplicate circuit plate/socket interface issues seen on warranty returned parts and evaluate potential solutions to eliminate root cause. Tail lamp assemblies were tested to the GM heel test contained in GMN8020TP, except the duration was increased from 60 to 120 minutes in an attempt to increase the severity and effect of the test. Samples tested included a pair of subject vehicle sedan and wagon tail lamp assemblies and a pair of sedan and wagon tail lamp assemblies molded out of PC/ABS, a current right hand wagon tail lamp and a right hand wagon tail lamp molded out of PC/ABS. Summary of Action: Inspection of samples tested indicated that the test samples demonstrated similar housing deformation in the area of the heat stakes around the brake/tail lamp function as seen on returned parts. Additional testing continues.

9. Describe all modifications or changes made by, or on behalf of, GM in the design, material composition, manufacture, quality control, supply, or installation of the subject component, from the start of production to date, which relate to, or may relate to, the alleged defect in the subject vehicles. For each such modification or change, provide the following information:

- The date or approximate date on which the modification or change was incorporated into vehicle production;
- A detailed description of the modification or change;
- The reason(s) for the modification or change;
- The part numbers (service and engineering) of the original component;
- The part number (service and engineering) of the modified component;
- Whether the original unmodified component was withdrawn from production and/or sale, and if so, when;
- When the modified component was made available as a service component; and
- Whether the modified component can be interchanged with earlier production components.

Also, provide the above information for any modification or change that GM is aware of which may be incorporated into vehicle production within the next 120 days.

A listing of the modifications or changes that may relate to the subject condition is provided on the Attachment 1CD; refer to the Microsoft Excel file in the folder labeled "Response to Q9."

10. Produce one of each of the following:
- Exemplar drawings of each design version of the subject component; and
 - Any kits that have been released, or developed, by GM for use in service repairs to the subject component/assembly which relate, or may relate, to the alleged defect in the subject vehicles.

The requested exemplar drawings of the L-Series sedan subject component are provided on the Attachment 1 CD; refer to the folder labeled "Response to Q10 - ATTACHMENT 10A. The requested exemplar drawings of the L-Series wagon subject component are provided on the Attachment 1 CD; refer to the folder labeled "Response to Q10 - ATTACHMENT 10B. GM has not released or developed any kits for use in service repairs to the subject component.

11. State the number of each of the following that GM has sold that may be used in the subject vehicles by component name, part number (both service and engineering/production), model, classification and model year of the vehicle in which it is used and month/year of sale (including the cut-off date for sales, if applicable):

- a. Subject component; and
- b. Any kits that have been released, or developed, by GM for use in service repairs to the subject component/assembly.

For each component part number, provide the supplier's name, address, and appropriate point of contact (name, title, and telephone number). Also identify by make, model and model year, any other vehicles of which GM is aware that contain the identical component, whether installed in production or in service, and state the applicable dates of production or service usage.

An electronic summary table of the requested service part information for the subject component is provided on the Attachment 1 CD; refer to the Microsoft Excel file in the folder labeled "Response for Q11." GM does not offer any kits that have been released or developed for use in service repairs specifically related to the subject condition.

12. Listed below are pairs of components. Consumers claim that the alleged defect occurs while operating these components in conjunction with the subject component. Explain the functional relationship between the pair of components. Discuss the impact of a failure between the pair of components. Discuss the method of attachment for each component, and discuss the impact of a failure of the attachment. In addition, provide drawings or diagrams to further illustrate the explanations.

- a. The service brakes and the tail lamps.
- b. The headlamps and the tail lamps.
- c. The tail lamp and the circuit board (power source).

a) Functional relationship Service Brakes and Tail Lamps

When the subject vehicles service brakes are applied closure of the electrical brake switch occurs. This closure applies a voltage to the brake/tail lamp of the driver and passenger lamp assemblies and the center high mounted stop lamp assembly (CHMSL).

The brake/tail lamp bulb is a two-filament bulb. One of the filaments in the bulb is the tail lamp the other is the brake lamp. The brake/tail lamp bulb is held in the lamp assembly by the socket. The socket contacts the tail lamp circuit plate (internal to the tail lamp assembly) to provide power and ground connections to both the bulb filaments. To further illustrate, Attachment 12A on the Attachment 1 CD, contains photographs of the lamp assembly in the subject vehicles, including the circuit plate, bulb and socket.

A failure; 1) of the electrical brake switch, 2) the fuse powering the switch or 3) vehicle wiring connecting the components to the lamp assembly, may result in loss of brake lamp function. The tail lamp filament may also fail to illuminate if the common brake/tail lamp ground contact in the socket does not make adequate contact with the circuit plate.

b) Functional relationship Headlamps and Tail Lamps

When the vehicles headlamps are active (power applied), the tail lamp filaments in the tail lamp assemblies will also be active. The headlamps and tail lamps do not share a common fuse. Failure of either headlamp filament (high/low beam) or the headlamp fuse will not affect the performance of the tail lamp assemblies. Failure of either of the tail lamp assemblies will not affect the performance of the headlamp filaments (high/low beam).

c) Functional relationship Tail Lamp and the Circuit Board (power source)

The lamp assembly circuit plate (internal to the tail lamp assembly) provides power and ground connections to the brake/tail lamp bulb through metal contacts on the socket. The tail lamp bulb is a two-filament bulb (tail lamp and brake lamp). The brake/tail lamp bulb is held in the lamp assembly by the socket. The circuit plate is attached to the tail lamp assembly (internally) with plastic heat stakes. Each socket is designed with one contact for the tail lamp filament, one contact for the brake lamp filament and one common ground contact. A failure of the socket to adequately contact the circuit plate may result in intermittent and/or non-functioning tail and brake lamp filaments accompanied by increased resistance between the contacts and higher temperatures in the tail lamp assembly.

13. Furnish GM's assessment of the alleged defect in the subject vehicle, including:

- a. The causal or contributory factor(s);
- b. The failure mechanism(s);
- c. The failure mode(s);
- d. The effect(s) of the failure;
- e. The risk(s) to motor vehicle safety that it poses;
- f. 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;
- g. A description of the analysis process used to assess items "a" through "f," and;
- h. The reports included with this inquiry.

The warranty analysis, Red "X" study and testing identified in response to item 8 indicates that inoperative brake/tail lamps, in the subject vehicles may result from the effect of brake/tail lamp bulb thermal loads in the lamp assembly.

The illumination of the brake and tail lamps in the subject vehicles is provided by a dual-filament bulb. The bulb is held in position in the brake/tail lamp cavity of the lamp assembly by a socket. A metal circuit plate inside the lamp assembly provides power and ground connections to the bulb filaments through the metal contacts in the socket. The metal circuit plate is retained to the housing by heat stakes in the lamp assembly housing.

Heat generated in the brake/tail lamp cavity when the bulb is activated affects the Acrylonitrile Butadiene Styrene (ABS) housing material and consequently the retention of the circuit plate to the housing. The heat generated in the lamp assembly by the dual-filament bulb causes ABS housing material to re-flow in the area of the heat stakes that retain the circuit plate. If the ABS material in the area of the brake/tail lamp cavity of the assembly re-flows enough as a result of the severe loading (long durations of brake lamp activations) the metal circuit plate can become loose, lose contact with the socket and dislodge. The effect of a loose circuit plate can be intermittent or inoperative brake and/or tail lamps. Dislodged circuit plates can move and short together causing the brake fuse to blow. The effect of a blown brake fuse is inoperative brakes lamps on the left side, right side and Center High Mounted Stop lamp (CHMSL).

The operator of the vehicle does not have any indication that the condition is occurring and that the vehicles brake/tail lamp function may be intermittent or inoperative. Other persons outside the vehicle may notice that the vehicles brake/tail lamps are intermittent or inoperative when the condition occurs. GM continues to investigate and assess this condition.

The analysis process used to access items 13a - 13f is described in detail in the response to item 8 above. The reports included with this inquiry and the reports being submitted by GM in this response appear to be consistent with the failure mechanisms noted above.

* * *

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 1996 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,



Gary P. Kent
Director
Product Investigations



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

MAR 4 2005

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

Gen-676 A

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

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

NVS-212cag
PE05-010

Dear Ms Kent:

This letter is to inform you that the Office of Defects Investigation (ODI) of the National Highway Traffic Safety Administration (NHTSA) has opened a Preliminary Evaluation (PE05-010) to investigate allegations of inoperative tail lamps in MY 2000-2002 Saturn L-Series vehicles manufactured by General Motors Corporation, and to request certain information.

This office has received 54 reports of inoperative tail lamps in model year (MY) 2000-2002 Saturn L-Series vehicles. These reports allege a defect in the design and assembly of the tail lamp assembly circuit board and the light socket contact. Under certain circumstances, the circuit board can melt/corrode, disrupting power to the tail lamp, and cause the tail lamp to go out completely and permanently. A copy of each of these reports has been sent electronically, for your information.

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

- **Subject vehicles:** all MY 2000-2002 Saturn L-Series vehicles, sedans and wagons, manufactured for sale or lease in the United States.
- **Subject component:** all tail lamps and tail lamp assemblies manufactured on the subject vehicles.
- **GM:** General Motors Corporation, all of its past and present officers and employees, whether assigned to its principal offices or any of its field or other locations, including all of its divisions, subsidiaries (whether or not incorporated) and affiliated enterprises and all of their headquarters, regional, zone and other offices and their employees, and all agents, contractors, consultants, attorneys and law firms and other persons engaged directly or indirectly (e.g., employee of a consultant) by or under the control of GM (including all business units and persons previously referred to), who are or, in or after



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888-327-4238

1996 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:** Complainants allege that the tail lamps go out completely while operating the vehicle.
 - **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.

1. State, by model and model year, the number of subject vehicles GM has manufactured for sale or lease in the United States. Separately, for each subject vehicle manufactured to date by GM, state the following:
 - a. Vehicle identification number (VIN);
 - b. Make;
 - c. Model;
 - d. Classification (sedan, wagon);
 - e. Model Year;
 - f. Date of manufacture;
 - g. Date warranty coverage commenced; and
 - h. The State in the United States where the vehicle was originally sold or leased (or delivered for sale or lease).

Provide the table in Microsoft Access 2000, or a compatible format, entitled "PRODUCTION DATA."

2. State the number of each of the following, received by GM, or of which GM is otherwise aware, which relate to, or may relate to, the alleged defect in the subject vehicles:
 - a. Consumer complaints, including those from fleet operators;
 - b. Field reports, including dealer field reports;

- c. Reports involving a crash, injury, or fatality, based on claims against the manufacturer involving a death or injury, notices received by the manufacturer alleging or proving that a death or injury was caused by a possible defect in a subject vehicle, property damage claims, consumer complaints, or field reports;
- d. Property damage claims; and
- e. Third-party arbitration proceedings where GM is or was a party to the arbitration; and
- f. Lawsuits, both pending and closed, in which GM is or was a defendant or codefendant.

For subparts "a" through "c," state the total number of each item (e.g., consumer complaints, field reports, etc.) separately. Multiple incidents involving the same vehicle are to be counted separately. Multiple reports of the same incident are also to be counted separately (i.e., a consumer complaint and a field report involving the same incident in which a crash occurred are to be counted as a crash report, a field report and a consumer complaint).

In addition, for items "d" through "f," provide a summary description of the alleged problem and causal and contributing factors and GM's assessment of the problem, with a summary of the significant underlying facts and evidence. For items "e" and "f," identify the parties to the action, as well as the caption, court, docket number, and date on which the complaint or other document initiating the action was filed.

3. Separately, for each item (complaint, report, claim, notice, or matter) within the scope of your response to Request No. 2, state the following information:
 - a. GM's file number or other identifier used;
 - b. The category of the item, as identified in Request No. 2 (i.e., consumer complaint, field report, etc.);
 - c. Vehicle owner or fleet name (and fleet contact person), address, and telephone number;
 - d. Vehicle's VIN;
 - e. Vehicle's make, model, classification and model year;
 - f. Vehicle's mileage at time of incident;
 - g. Incident date;
 - h. Report or claim date;
 - i. Whether a crash is alleged;
 - j. Whether a fire is alleged;
 - k. Whether property damage is alleged;
 - l. Number of alleged injuries, if any; and
 - m. Number of alleged fatalities, if any.

Provide this information in Microsoft Access 2000, or a compatible format, entitled "COMPLAINT DATA".

4. Produce copies of all documents related to each item within the scope of Request No. 2. Organize the documents separately by category (i.e., consumer complaints, field reports, etc.) and describe the method GM used for organizing the documents.
5. State, by model, classification 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 "WARRANTY DATA."

6. Describe in detail the search criteria used by GM to identify the claims identified in response to Request No. 5, 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.
7. 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.
8. 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.

9. Describe all modifications or changes made by, or on behalf of, GM in the design, material composition, manufacture, quality control, supply, or installation of the subject component, from the start of production to date, which relate to, or may relate to, the alleged defect in the subject vehicles. For each such modification or change, provide the following information:
 - a. The date or approximate date on which the modification or change was incorporated into vehicle production;
 - b. A detailed description of the modification or change;
 - c. The reason(s) for the modification or change;
 - d. The part numbers (service and engineering) of the original component;
 - e. The part number (service and engineering) of the modified component;
 - f. Whether the original unmodified component was withdrawn from production and/or sale, and if so, when;
 - g. When the modified component was made available as a service component; and
 - h. Whether the modified component can be interchanged with earlier production components.

Also, provide the above information for any modification or change that GM is aware of which may be incorporated into vehicle production within the next 120 days.

10. Produce one of each of the following:
 - a. Exemplar drawings of each design version of the subject component; and
 - b. Any kits that have been released, or developed, by GM for use in service repairs to the subject component/assembly which relate, or may relate, to the alleged defect in the subject vehicles.
11. State the number of each of the following that GM has sold that may be used in the subject vehicles by component name, part number (both service and engineering/production), model, classification and model year of the vehicle in which it is used and month/year of sale (including the cut-off date for sales, if applicable):
 - a. Subject component; and
 - b. Any kits that have been released, or developed, by GM for use in service repairs to the subject component/assembly.

For each component part number, provide the supplier's name, address, and appropriate point of contact (name, title, and telephone number). Also identify by make, model and model year, any other vehicles of which GM is aware that contain the identical component, whether

installed in production or in service, and state the applicable dates of production or service usage.

12. Listed below are pairs of components. Consumers claim that the alleged defect occurs while operating these components in conjunction with the subject component. Explain the functional relationship between the pair of components. Discuss the impact of a failure between the pair of components. Discuss the method of attachment for each component, and discuss the impact of a failure of the attachment. In addition, provide drawings or diagrams to further illustrate the explanations.
 - a. The service brakes and the tail lamps.
 - b. The headlamps and the tail lamps.
 - c. The tail lamp and the circuit board (power source).
13. Furnish GM's assessment of the alleged defect in the subject vehicle, including:
 - a. The causal or contributory factor(s);
 - b. The failure mechanism(s);
 - c. The failure mode(s);
 - d. The effect(s) of the failure;
 - e. The risk(s) to motor vehicle safety that it poses;
 - f. 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;
 - g. A description of the analysis process used to assess items "a" through "f," and;
 - h. The reports included with this inquiry.

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 \$16,050,000 for a related series of violations, for failing or refusing to perform an act required under 49 U.S.C. § 30166. See 49 CFR 578.6 (as amended by 69 Fed. Reg. 57864 (Sept. 28, 2004)). 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

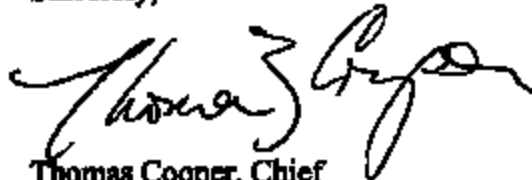
all carbon copies or blind carbon copies), the nature of that information or material, and the basis for the claim of privilege and why that privilege applies.

GM's response to this letter, in duplicate, together with a copy of any confidentiality request, must be submitted to this office by April 15, 2005. Please refer to PE05-010 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) 366-5218 no later than five business days before the response due date. If GM is unable to provide all of the information requested by the original deadline, it must submit a partial response by the original deadline with whatever information GM then has available, even if an extension has been granted.

If GM claims that any of the information or documents provided in response to this information request constitute confidential commercial material within the meaning of 5 U.S.C. § 552(b)(4), or are protected from disclosure pursuant to 18 U.S.C. § 1905, GM must submit supporting information together with the materials that are the subject of the confidentiality request, in accordance with 49 CFR Part 512, as amended (69 Fed. Reg. 21409 et seq; April 21, 2004), to the Office of Chief Counsel (NCC-113), National Highway Traffic Safety Administration, Room 5219, 400 Seventh Street, S.W., Washington, D.C. 20590. GM is required to submit two copies of the documents containing allegedly confidential information (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 Cynthia Glass of my staff at (202) 366-2920.

Sincerely,



Thomas Cooper, Chief
Vehicle Integrity Division
Office of Defects Investigation

VOQ Numbers:

562085, 566479, 759455, 769648, 770336, 8017118, 8020599, 8022850, 10003676, 10017613, 10018905, 10024503, 10024805, 10033374, 10039774, 10040856, 10046544, 10048600, 10049727, 10057208, 10057511, 10058195, 10058222, 10061163, 10064907, 10069520, 10072656, 10078466, 10078667, 10078787, 10082627, 10083602, 10090050, 10093363, 10093765, 10095027, 10095877, 10096418, 10098015, 10098233, 10098278, 10098456, 10094581, 10099695, 10100417, 10100897, 10102575, 10103758, 10104176, 10105937, 10106167, 10106324, 10108357, 10109129

GM676A
PE05-010

ATTACHMENT "1"

GM NON-CONFIDENTIAL MATERIAL

GM676A
PE05-010

ATTACHMENT "1"

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