

*Jeff*  
11/21/05

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Jeffrey L. Quandt, Chief  
Vehicle Control Division  
Office of Defects Investigation  
National Highway Traffic Safety Administration  
Room #5326  
400 Seventh Street, S.W.  
Washington, D.C. 20590

OFFICE OF DEFECTS INVESTIGATION  
GM-679 Update

NVS-213cla  
PE05-020

Dear Mr. Quandt:

This letter is General Motors' (GM) updated response to your information request (IR) dated May 10, 2005, regarding allegations of increased stopping distance or ineffective braking during low speed brake applications, due to corrosion of the front wheel speed sensor mounting surface, in certain 1999 through 2002 model year (MY), C/K series GMT800 pickup trucks and sport utility vehicles, manufactured for sale or lease in the United States by GM.

GM is including additional regular warranty claims and incident reports received between May and October 2005.

The Attachment 1 CD includes the additional warranty claims and incident reports as well as, warranty claims and incident reports previously provided in response to your information request dated May 10, 2005.

Your questions and our corresponding updated replies are as follows:

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. Reports involving a fire, 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 "g" 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 "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 2-1a and Table 2-1b summarize the 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 OF PROPERTY DAMAGE	NUMBER OF REPORTED INJURIES*	CRASHES	FIRES
Owner Reports	587	528	39	2A	36	5	115	0
Field Reports and Technical Assistance System Reports	08	05	3	2B	1	0	1	0
Not-In-Bulk Claims	17	15	2	2C	13	1	15	0
Subrogation Claims	0	0	0	N/A	0	0	0	0
Third Party Arbitration Proceedings	0	0	0	N/A	0	0	0	0
Product Liability Lawsuits	0	0	1	2E	0	0	0	0
Total (including Duplicates)	600	533	45	N/A	50	6	131	0

TABLE 2-1A: REPORT BREAKDOWN 1999 - 2002 MY GMT800 PLATFORM C/K TRUCKS AND UTILITY VEHICLES (CORROSION STATES)

\* GM IS NOT AWARE OF ANY FATALITIES REPORTED FOR THE SUBJECT CONDITION

TYPE OF REPORT	COUNT (INCLUDING DUPLICATES)	GM REPORTS	GM REPORTS CORRESPONDING TO NHTSA REPORTS	LOCATION OF REPORTS (ATTACHMENT)	NUMBER OF PROPERTY DAMAGE	NUMBER OF REPORTED INJURIES*	CRASHES	FIRES
Owner Reports	48	44	5	2A	4	0	6	0
Field Reports and Technical Assistance System Reports	57	57	0	2B	0	0	0	0
Not-in-Suit Claims	1	1	0	N/A	1	0	1	0
Subrogation Claims	0	0	0	N/A	0	0	0	0
Third Party Arbitration Proceedings	0	0	0	N/A	0	0	0	0
Product Liability Lawsuits	0	0	0	N/A	0	0	0	0
Total (Including Duplicates)	107	102	5	N/A	5	0	7	0

TABLE 2-1B: REPORT BREAKDOWN 1999 - 2002 MY GMT900 PLATFORM C/K TRUCKS AND UTILITY VEHICLES (NON-CORROSION STATES)

\* GM IS NOT AWARE OF ANY FATALITIES REPORTED FOR THE SUBJECT CONDITION

While reviewing incident reports involving vehicle crashes, GM found six reports that should have been excluded from the response to the original information request. The six records are not included in the Attachment 1 CD.

To date, GM's investigation of the alleged defect has not included an assessment of the cause(s) of each incident responsive to Request No. 2. Some incident reports may not contain sufficient reliable information to accurately assess cause. Assessments of other incidents (from lawsuits and claims) may be attorney work product and/or privileged. Therefore, information and documents provided in this response, if any, consist only of non-attorney work product and/or non-privileged material for incidents that have been investigated and assessed.

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
Customer Assistance Center	10/11/2005
Technical Assistance Center	10/11/2005
Field Information Network Database (FIND)	11/11/2005
Field Product Report Database (FPRD)	11/11/2005
Company Vehicle Evaluation Program (CVEP)	11/11/2005
Legal / Employee Self Insured Services (ESIS)	10/12/2005

TABLE 2-2: DATA SOURCES

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 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 "REQUEST NUMBER TWO DATA." See Enclosure 1, Data Collection Disc, for a pre-formatted table that provides further details regarding this submission.

The requested information is provided on the CD in Attachment 1, in a folder labeled Response to Q3; refer to the Microsoft Access 2000 file in the folder, "REQUEST NUMBER TWO DATA - UPDATE".

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 2-1A and Table 2-1B. GM has organized the records by the GM file number within each attachment.

5. 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 that were provided; field, zone, or similar adjustments and reimbursements; and warranty claims or repairs made in accordance with the procedure specified in technical service bulletin 03-05-25-007A or customer satisfaction campaign.

Separately, for each such claim, state the following information:

- GM's claim number;
- Vehicle owner or fleet name (and fleet contact person) and telephone number;
- VIN;
- Repair date;
- Vehicle mileage at time of repair;
- Repairing dealer's or facility's name, telephone number, city and state or ZIP code;
- Labor operation number;
- Problem code;
- 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." See Enclosure 1, Data Collection Disc, for a pre-formatted table that provides further details regarding this submission.

The regular warranty claims for the subject vehicles in corrosion and non-corrosion states that may be responsive to this request, are summarized in Tables 5-1 and 5-2 below. A summary of the warranty reports are provided in the Attachment 1 CD; refer to the folder labeled, "Response for Q5".

Make	Model	1999	2000	2001	2002	Total
Chevrolet	INCOMP CHEV CK PICKUP	0	0	0	0	0
Chevrolet	SILVERADO	21	87	118	247	451
Chevrolet	SUBURBAN	0	2	18	29	47
Chevrolet	TAHOE & AVALANCHE	0	5	28	114	147
GMC	INCOMP GMC CK PICKUP	0	0	0	0	0
GMC	SIERRA	4	12	33	87	136
GMC	YUKON	0	3	8	11	20
GMC	YUKON XL	0	6	12	18	34
Total		25	95	211	504	635

TABLE 5-1 Regular Warranty Claims (Corrosion States)

Make	Model	1999	2000	2001	2002	Total
Chevrolet	INCOMP CHEV CK PICKUP	0	0	0	0	0
Chevrolet	SILVERADO	6	7	11	45	69
Chevrolet	SUBURBAN	0	1	8	18	28
Chevrolet	TAHOE & AVALANCHE	0	0	3	31	34
GMC	INCOMP GMC CK PICKUP	0	0	0	0	0
GMC	SIERRA	1	5	4	16	26
GMC	YUKON	0	1	0	5	6
GMC	YUKON XL	0	0	3	3	6
Total		7	14	30	118	169

TABLE 5-2 Regular Warranty Claims (Non-Corrosion States)

GM searched the GM North America Claim Adjustment Retrieval Database (CARD-regular warranty database) to collect the warranty data for this response. The warranty data was last gathered on October 6, 2005.

A summary of warranty claims that may relate to the subject condition is provided on the CD in Attachment 1, in the folder labeled Response to Q5; refer to the Microsoft Access 2000 file labeled "REQUEST NUMBER FIVE - WARRANTY DATA UPDATE."

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 5K (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 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 GM regular warranty claims that may relate to the subject condition were collected by searching for the labor codes listed in Tables 6-1 below. GM has included regular warranty claims when either the wheel speed sensor or bearing and hub assembly was replaced. The list of trouble codes used during the search is included in Table 6-2 below

LABOR CODE	DESCRIPTION:
H2410	Sensor, Wheel Speed - Front - Right - Replace
H2411	Sensor, Wheel Speed - Front - Left - Replace
H2412	Sensor, Wheel Speed - Front - Both - Replace
E2320	Bearing And Hub Assembly, Front Wheel - Right - Replace
E2321	Bearing And Hub Assembly, Front Wheel - Left - Replace
E2327	Bearing And Hub Assembly, Front Wheel - Both - Replace

TABLE 6-1 LABOR CODES USED IN WARRANTY SEARCH

TROUBLE CODE	DESCRIPTION:
1B	CASTING DEFECT
1Y	FOREIGN MATERIAL
2E	CLEARANCE-EXCESSIVE
2N	INSUFFICIENT LUBRICATION
2T	INCORRECT TORQUE
3A	MISADJUSTED/MISALIGNED
3L	OUT OF CALIBRATION
3X	REGISTERS INCORRECTLY
5T	POOR METAL FINISH
6W	RUSTED/CORRODED
8C	COMPONENT-INOPERATIVE
8D	COMPONENT-INTERMITTENT

TABLE 6-2 TROUBLE CODES USED IN WARRANTY SEARCH

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 GM warranty system does not contain information on the number of vehicles that have extended warranty coverage.

\* \* \*

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 January 1, 1984, 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

Attachment:  
Attachment 1 CD

**GM679 Update  
PE05-020**

**ATTACHMENT "1"**