



January 25, 2006

Thomas Z. Cooper, Chief
 Vehicle Integrity Division
 Office of Defects Investigation
 NHTSA Enforcement
 Room #5326
 400 Seventh Street, S.W.
 Washington, D.C. 20590

GM-683

NVS-212mbs
 PE05-063

Dear Mr. Cooper:

This letter is General Motors' (GM) response to your information request (IR), dated December 5, 2005, regarding allegations of damage to the Underhood Bussed Electrical Center (UBEC) harness by the wiper motor crank arm, in 2005 model year (MY) Buick Terraza, Chevrolet Uplander, Pontiac Montana SV6, and Saturn Relay vehicles, as described in the GM service bulletin number 1613174 (PIT#3313).

Your questions and our corresponding replies are as follows:

1. State the number of all subject vehicles GM has manufactured for sale or lease in the United States. Separately, for each vehicle manufactured to date by GM, state the following:
 - a. Model;
 - b. Vehicle Identification number (VIN);
 - c. Date of manufacture;
 - d. Date warranty coverage commenced; and
 - e. 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:

<u>MAKE/ MODEL</u>	<u>2005MY</u>
Buick Terraza	19,696
Chevrolet Uplander	51,714
Pontiac Montana SV6	19,166
Saturn Relay	17,794
Total	108,370

TABLE 1 VEHICLE PRODUCTION

The production information requested in 1a-e is provided on the Attachment 1 CD, in the folder labeled: "Response for Q1;" refer to the Microsoft Access 2000 file labeled PRODUCTION DATA. GM is providing the state where the vehicle was shipped in response to request 1e. 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 are 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 "e," 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 2-1 below summarizes records that relate to any damage to the wires of the UBEC harness caused by contact with the wiper motor crank arm.

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.

TYPE OF REPORT	GM REPORTS	SUBCATEGORIES				
		CORRESPONDING TO NHTSA REPORTS	NUMBER WITH PROPERTY DAMAGE	NUMBER WITH CRASH	NUMBER WITH INJURIES/FATALITIES	NUMBER WITH FIRES*
Owner Reports	2	0	0	0	0	0
Field Reports	14	0	0	0	0	1
Not-In-Suit Claims	0	0	0	0	0	0
Subrogation Claims	0	0	0	0	0	0
Third Party Arbitration Proceedings	0	0	0	0	0	0
Product Liability Lawsuits	0	0	0	0	0	0
Total Reports (including Duplicates)	16	0	0	0	0	1
Total Vehicles with Reports (Unique VIN)	16	0	0	0	0	1

TABLE 2-1: REPORT BREAKDOWN
 * CUSTOMER REPORTED SMOKE ONLY

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 (CAC)	12/12/2005
Technical Assistance Center (TAC)	12/09/2005
Field Information Network Database (FIND)	12/13/2005
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)	12/13/2005
Legal / Employee Self Insured Services (ESIS) / Product Liability Claims and Lawsuits	12/23/2005

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:
 - 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 model;
 - 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 "REQUEST NUMBER TWO DATA."

GM is providing the requested information in 3(a-m) in Attachment 1 CD, folder labeled: "Response for Q3;" refer to Microsoft Access file named "Request Number Two 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 summarized in Table 2-1 are embedded in the file provided in Attachment 1 CD GM; folder labeled: "Response for Q3," refer to the Microsoft Access file. GM has organized the records by the GM file number within each attachment.

5. State 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. Model;
- e. Repair date;
- f. Vehicle mileage at time of repair;
- g. Repairing dealer's or facility's name, telephone number, city and state or ZIP code;
- h. Labor operation number;
- i. Problem code;

- j. Replacement part number(s) and description(s);
- k. Concern stated by customer; and
- l. Comment, if any, by dealer/technician relating to the m and/or repair.

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

GM is providing warranty claims that relate to any damage to the wires of the UBEC wire harness, caused by contact with the wiper motor crank arm in Table 5-1 below. A summary of these warranty claims is provided on the Attachment 1 CD; refer to the folder labeled: "Response to Q5." There were no MIC extended warranty claims or Universal Warranty Corporation (UWC) claims found.

2005MY	TOTAL
REGULAR WARRANTY CLAIMS (UNIQUE VINS)	87*
MIC EXTENDED WARRANTY CLAIMS	0
Universal Warranty Corporation (UWC – extended warranty)	0

TABLE 5-1 WARRANTY CLAIMS

* 12 additional warranty claims are listed in this response because multiple labor codes were submitted for the same repair.

The sources of the requested information and the last date the searches were conducted are tabulated in Table 5-2 below.

SOURCE SYSTEM	LAST DATE GATHERED
GM CARD –regular warranty	12/07/2005
Motors Insurance Corporation (MIC) – extended warranty	12/06/2005
Universal Warranty Corporation (UWC) – extended warranty	12/29/2005

TABLE 5-2: DATA SOURCES

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, labor, and other (such as towing and rental car) costs incurred in performing warranty service for our customers.

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 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) related to the alleged defect 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 CARD warranty database was searched using 66 labor codes which can be found in the folder labeled: "Response to Q6," on the Attachment 1 CD. These labor codes are associated with wire/connector repairs for the various systems that may be affected by this alleged defect. GM reviewed the results of the search and found that the condition(s) experienced by the owner as listed in bulletin number 1613174/ PIT#3313 may relate to many other root causes. For claims without comments, GM is unable to identify the root cause. There is not a unique part number associated with this repair (typically the wiring harness is repaired rather than replaced) and there is no consistency in the labor code used for this repair.

GM is providing warranty claims where it was reported that the wiper motor linkage damaged the UBEC wire harness. This is an unusual and infrequent failure mode which was likely noted in the claim comments. In the cases of "multiple wires cut," the dealers requested additional time for reimbursement purposes and there are multiple labor codes/claims for the same VIN.

Warranty claim records for the 66 labor codes that had no verbatim or had a verbatim that did not identify the alleged defect were not provided. For example, labor code "N6638 - Wire/Connector, Wiper/Washer System- Repair" was used for warranty claims for the front or the rear wiper/washer systems repairs including hoses.

The MIC extended warranty data was collected by searching the labor codes found in the folder labeled: "Response to Q6" on the Attachment 1 CD. UWC extended warranty data was searched for the labor code description "Enhanced Electrical Miscellaneous."

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.

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.

GM has identified the following communications that relate to the alleged defect on the subject vehicles in Table 7. Copies of the communications are provided on the Attachment 1 CD; refer to the folder labeled: "Response to Q7." GM is not planning to issue any service, warranty, or other documents within the next 120 days.

DOCUMENT I.D.	DOCUMENT TITLE	ISSUE DATE
PIT3299	Stall, no crank, no start after using wipers (05 Buick Terraza, Chevrolet Uplander, Pontiac Montana SV6, and Saturn Relay)	12/1/2004
1613174	Stall, no crank, no start after using wipers- keywords arm communication cruise C0460 C0461 C0187 DTC harness inoperative open P0608 PCM sensor short steering red trac u1000 u1301 UBEC wire PIT#3313	2/21/2005

TABLE 7 BULLETINS AND OTHER DOCUMENTS

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.

Table 8 below summarizes the actions performed by GM that relate or may relate to the alleged defect. Documents are provided in the attachments as noted in the table. Data for Actions 8A-F was gathered through December 20, 2005 and data for Action 8G was gathered through January 20, 2006.

<p>Action: 8A, Product Development Start Date: Sept 2002 End Date: June 2003 Engineering Group: Product Development Team (PDT) Attachments: Documents can be found on Attachment 1CD, "Response to Q6" folder, "Action 8A" folder Description: Product development design review showed the wiper crank arm contacted the IP harness during operation. Summary of Action: Interference issues were resolved during development review meetings. PDT approved clearances in June 2003.</p>
<p>Action: 8B, Containment 1 Start Date: 11/30/2004 End Date: 5/31/2005 Engineering Group: Doraville assembly plant Attachments: Documents can be found on Attachment 1CD, "Response to Q6" folder, "Action 8B" folder Description: Response to report of wire harness damaged by wiper motor arm through the 24 hour CDP (Concern Detection Process). Summary of Action: An installation aid was added to push the wire harness "loop" under the wiper motor and two inspections were added to check the position of the wire harness.</p>
<p>Action: 8C, PRTS N177731 Start Date: 2/28/2005 End Date: 6/1/2005 Engineering Group: Doraville assembly plant Attachments: Documents can be found on Attachment 1CD, "Response to Q6" folder, "Action 8C" folder Description: This PRTS was opened to track the wiper motor arm interference to the UBEC wire harness when the wipers were used. Summary of Action: Initially, this information was included in PRTS N165456.</p>

<p>Action: 8D, Containment 2 Start Date: 3/16/2005 End Date: 6/1/2005 Engineering Group: Doraville assembly plant Attachments: Attachments: Documents can be found on Attachment 1CD, "Response to Q8" folder, "Action 8D" folder Description: Response to second report of wire harness damaged by the wiper motor arm through the 24 hour CDP. Summary of Action: Doraville assembly added another inspection on the Final Line and CARE Line to check the wire harness clearance to the wiper motor linkage on 3/21/2005.</p>
<p>Action: 8E, PRTS N165458 Start Date: 3/17/2005 End Date: 9/09/2005 Engineering Group: Exterior group Attachments: Documents can be found on Attachment 1CD, "Response to Q8" folder, "Action 8E" folder Description: A hard interference on the instrument panel (I/P) harness between the washer bottle and the wiper motor that made installation of the harness difficult was discovered at launch build. Summary of Action: A warranty analysis of all electrical issues on 3/17/2005 revealed warranty claims for the wiper motor linkage damaging the wire harness. The washer bottle design change to address the launch build interference issue was expected to also resolve the wiper motor linkage damaging the wire harness issue.</p>
<p>Action: 8F, PRTS N184808 Start Date: 5/17/2005 End Date: 11/22/2005 Engineering Group: Electrical group, Doraville assembly plant Attachments: Documents can be found on Attachment 1CD, "Response to Q8" folder, "Action 8F" folder Description: Consider alternatives to assure the IP wire harness will not be in the travel path of the wiper motor linkage. Summary of Action: A tie strap was considered the most effective solution to holding the wire harness away from the wiper arm linkage. A stud was added to the underhood compartment and a tie strap was assembled to the wire harness to secure it away from the wiper motor linkage. The tie strap came on the wire harness assembly starting on 11/22/2005.</p>
<p>Action: 8G, Warranty and Other Analysis Start Date: 11/11/2005 End Date: ongoing Engineering Group: Product Investigations Attachments: Documents can be found on Attachment 1CD, "Response to Q8" folder, "Action 8G" folder Description: Develop risk assessment. Summary of Action: Performed warranty data analysis on records responsive to this investigation. Compiled information from the IR data gathering process to understand this issue.</p>

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;

- 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.

GM is providing a summary of the GM product engineering information requested in 9(a-h), along with copies of the GM Engineering Work Orders in Attachment 1 CD, folder labeled: "Response for Q9."

GM is not planning to incorporate any modifications or changes into production of the subject vehicles that relate to the alleged defect within the next 120 days.

10. Identify by circuit identification, circuit number, and color code, all of the wires that are within the section of the UBEC harness that may be damaged by the wiper motor crank arm as stated in bulletin number PIT33313.

GM is providing the information in the file labeled: "Response to Q10" on the Attachment 1 CD.

11. Produce one copy of an electrical schematic drawing of the UBEC harness and one copy of a drawing showing the UBEC harness location and layout in the subject vehicles.

GM is providing the UBEC harness electrical schematic drawings and photos of the UBEC harness location/ layout in the subject vehicles in the folder labeled: "Response to Q11" on the Attachment 1 CD.

12. Produce one of each of the following:

- a. Exemplar samples of each design version of the subject components;
- b. Field return samples of the subject component exhibiting the subject failure mode;
- c. 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.

a. GM is providing photos of the subject component due to its size and weight. See the file labeled: "Response to Q12" on the Attachment 1 CD.

b. GM does not have any field return samples of the subject component. Due to the complexity of this part, the wire harness is typically repaired and not replaced. GM is providing photos of UBEC wire harnesses that were reportedly damaged by the wiper arm motor linkage.

- c. GM has not developed or released a kit for this alleged defect in the subject vehicles. A generic kit is available for splicing out wires. This splice kit is used for wire repairs across all vehicles built since 1991.

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

- a. Subject components;
- 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 which GM has produced that contain the identical subject components, whether installed in production or in service, and state the applicable dates of production or service usage.

The requested information is provided on the CD in Attachment 1, in the folder labeled: "Response to Q13." These sales numbers represent sales to dealers worldwide. This data has limited analytical value in analyzing the field performance of a motor vehicle component, because the records do not contain sufficient information to establish the reason for the part sale. It is not possible from this data to determine the number of these parts that have been installed in the subject vehicles, or the number remaining in dealer or replacement part supplier inventory.

Monthly part sales information available for the most recent 24 months have been included. Information regarding the generic splice kit is not included since it is used for wire repairs on all GM vehicles built since 1991.

The source of the Chevrolet, Pontiac, and Buick part sales information, current as of January 6, 2006, is GM Service Parts Operations. The Saturn part sales information was gathered on January 10, 2006.

14. 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 risk to motor vehicle safety that it poses;
 - e. 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; and
 - f. The reports included with this inquiry.
-
- a. The UBEC wire harness routes under the wiper motor and over the washer bottle before connecting to the fuse block. The section of the wire harness in this area is rigid since it consists of 42 wires wrapped with tape. There is an additional length of wire near the fuse block to allow the assembly operator to bend the harness to make the connection. This

additional length of wire harness, or "loop," is tucked under the wiper motor, away from the wiper linkage travel path. The majority of vehicles have the "loop" properly tucked.

- b. The wiper motor linkage rotates clockwise into the area between the wiper motor and the neck of the washer bottle. If the UBEC wire harness is not seated beneath the wiper motor, the wiper arm linkage may contact the wire harness when the wipers are being used and may cause damage to the wire harness.
- c. The failure mode experienced depends on the wire(s) that is cut or chafed. See the response to question 10 of this letter for the circuits involved in this area. In reported cases of the wiper arm contacting the UBEC harness, the customer or technician reported the following: the service engine light went on and off with the operation of the wipers, the service theft system lamp/ message illuminated, the vehicle did not crank or start, the shift indicator light went off, the HVAC blowers were insufficient or inoperative, the horn honked with the wipers on, the wipers were inoperative, the service brake system light stayed on, various fuses were blown (affecting the wipers, rear heater, ABS, power locks/ windows, cigarette/ power outlet, communication with PCM or SDM), the main body fuse was blown (all interior electrical components inoperative), the automatic passenger air bag sensor went on/off, wipers would not shut off, the vehicle stalled, the service park lamp indicator stayed on, the seatbelt light stayed on, the dash was inoperative, the airbag circuit was inoperative, headlamps were inoperative, and the "hood ajar" IP lamp flickered.
- d. GM believes there is no unreasonable risk to motor vehicle safety.

Analysis of the warranty complaints shows that interference and wiring harness damage can occur because of build variation, but only a limited number of vehicles have been affected (the IPTV is 0.80). The majority of the reported complaints were for non-safety concerns and occurred under 1,000 miles. GM estimates the mean accumulated mileage for the 2005 MY vehicle population to be 11,750 miles.

Approximately 1/3 of warranty repairs were completed before the vehicles were sold. The GM Dealer Policy and Procedures Manual regarding Pre-Delivery Inspection (PDI) for passenger cars and light trucks instructs the technician to check that "Hoses, lines, cables, and wire attachments are free of kinks and clear of any moving/ hot parts."

The cumulative IPTV (by build month) shows a decreasing trend (4 IPTV to 1.5 IPTV) with the first containment in November 2004. The incremental IPTV (for repair claims) is below 0.1 IPTV at 270 days exposure. The number of warranty claims each month is declining and GM expects it to continue to decline. The low number of vehicles that were built with the interference condition have experienced wiring harness damage and have been repaired. The balance of the vehicles will not experience this condition. GM will continue to monitor field reports for this issue.

- e. The operator may experience one or more of the failure modes described in 14c above. The GM Dealer Policy and Procedures Manual regarding Pre-Delivery Inspection (PDI) for passenger cars and light trucks instructs the technician to check fluid levels. Damaged wires should be apparent to an operator when filling the washer bottle or a technician when working under the hood. If the UBEC wire harness was not properly tucked, the "loop" would be in the travel path of the wiper motor linkage, which is near the base of the windshield on the passenger side of the vehicle and the neck of the washer fluid bottle. This area is easily accessible and visible.
- f. The vehicle referenced in the VOQ report included in this inquiry was built before the permanent corrective action was implemented (around July 20, 2005). The warranty claim

is included in response to Question 5 and in the analysis in response to Question 8- Action 8G.

* * *

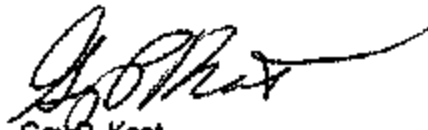
This response is based on searches of General Motors Corporation (GM) locations where documents determined to be responsive to your request would ordinarily be found. As a result, the scope of this search did not include, nor could it reasonably include, "all of their divisions, subsidiaries (whether 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 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