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OFFICE OF
INVESTIGATION

Jeffrey L. Quandt, Chief
Vehicle Control Division
Office of Defects Investigation
NHTSA Enforcement
Room #5326
400 Seventh Street, S.W.
Washington, D.C. 20590

GM-885

NVS-213cla
RQ05-003

Dear Mr. Quandt:

General Motors (GM) is providing information in response to your Recall Query (RQ05-003), dated January 10, 2006, to investigate allegations of fuel line retaining tab failure on the fuel pump, in 2001 MY Saab 9-3 vehicles not included in Recall 04V-557.

Unless otherwise indicated, GM is providing information regarding the 2001 MY Saab 9-3 vehicles manufactured in the Trollhattan, Sweden plant (Non-recalled vehicles).

Your RQ also states that, if a responsive document is not in the English language, both the original document and an English translation of the document should be provided. GM has translated each of the Swedish documents responsive to questions 8, 9, and 10.

Your questions and our corresponding replies are as follows:

1. State, by model and model year, the number of vehicles equipped with the subject components that GM has manufactured for sale or lease in the United States. Separately, for each such vehicle manufactured to date by GM, state the following:
 - a. Vehicle identification number (VIN);
 - b. Make;
 - c. Model;
 - d. Model Year;
 - e. Plant of manufacture;
 - 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 2003, or a compatible format, entitled "PRODUCTION DATA." See Enclosure 1, Data Collection Disc, for a pre-formatted table that provides further details regarding this submission.

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:

| Make | Model | MY | Plant | Total | |
|------|-------|------|---------|--------|--------------|
| Saab | 9-3 | 2001 | Sweden | 11,824 | Non-recalled |
| Saab | 9-3 | 2001 | Finland | 8,857 | Recalled |
| | | | Total | 20,681 | |

TABLE 1 - VEHICLE PRODUCTION
VEHICLE PRODUCTION DATED FEBRUARY 15, 2006.

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, and all other vehicles equipped with the subject components, and which were received by GM:
 - 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 may be related to the alleged condition.

| 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 | 34 | 4 | 0 | 0 | 0 | 0 |
| Field Reports | 4 | 0 | 0 | 0 | 0 | 0 |
| 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) | 38 | 4 | 0 | 0 | 0 | 0 |
| Total Vehicles with Reports (Unique VIN) | 38 | 4 | 0 | 0 | 0 | 0 |

TABLE 2-1: REPORT BREAKDOWN

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.

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) | February 6, 2006 |
| Saab Customer Assistance Center | January 26, 2006 |
| Technical Assistance Center (TAC) | February 8, 2006 |
| Field Information Network Database (FIND) | February 2, 2006 |
| Company Vehicle Evaluation Program (CVEP) | January 19, 2006 |
| Captured Test Fleet (CTF) | January 19, 2006 |
| Early Quality Feedback (EQF) | January 19, 2006 |
| Field Product Report Database (FPRD) | February 2, 2006 |
| Legal / Employee Self Insured Services (ESIS) / Product Liability Claims and Lawsuits | February 17, 2006 |

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 make, model 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 2003, 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.

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, 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, and all other vehicles equipped with the subject components, including repair or replacement of the fuel pump or fuel line retainer tabs: warranty claims; extended warranty claims; claims for good will services that were made in accordance with the procedure specified in safety recall 04V577 ; field, zone, or similar adjustments and reimbursements; and warranty claims or repairs made.

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 2003, 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.

GM is providing warranty claims and Saab Extended Warranty claims that relate to incidents which allege fuel leakage at the fuel pump module that may be related subject condition 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."

The information requested in 5b is not being provided, as Saab's warranty database does not contain the vehicle owner's name or telephone number. Information requested in 5 (j, k) is being provided when included in the warranty claim.

| 2001MY | TOTAL |
|---------------------------------------|-------|
| Regular Warranty Claims (Unique VINs) | 102 |
| Saab Extended Warranty Claims | 61 |

TABLE 5-1 WARRANTY CLAIMS

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 |
|------------------------|--------------------|
| Saab Warranty | February 3, 2006 |
| Saab Extended Warranty | February 15, 2006 |

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 either the condition of the part at the time of the warranty correction or the circumstances under which the alleged problem occurred; and service personnel may not consistently use the appropriate labor and trouble codes. Warranty records represent claims by our dealers for reimbursement for parts and labor costs incurred in performing warranty service for our customers.

- 8. Describe in detail the search criteria used by GM to identify the claims identified in response to Request No. 3, including the labor operations, problem codes, part numbers and any other pertinent parameters used. Provide a list of all labor operations, labor operation descriptions, problem codes, and problem code descriptions applicable to the 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 Saab Cars USA, Inc. regular warranty and extended warranty that may relate to the subject condition were collected by searching for the labor codes listed in Table 6-1 below. The list of trouble codes used during the search is included in Table 6-2 below.

| LABOR CODE | DESCRIPTION: |
|------------|------------------------|
| 24110 | Fuel Pump Replacement |
| 23411 | Fuel Tank |
| 23420 | Fuel Level Transmitter |

TABLE 6-1 LABOR CODES USED IN WARRANTY SEARCH

| TROUBLE CODE | DESCRIPTION: |
|--------------|----------------------------|
| 9 | Broken |
| 31 | Cracked |
| 32 | Fractured |
| 35 | Separation |
| 37 | Deformed/shape defect |
| 50 | Leakage |
| 57 | Oil Leakage |
| 58 | Fuel Leakage |
| 61 | Unsatisfactory Performance |

TABLE 6-2 TROUBLE CODES USED IN WARRANTY SEARCH

For the subject vehicles, Saab's new car warranty features "bumper to bumper" coverage for 4 years or 50,000 miles, whichever comes first. The fuel pump is covered under the standard "bumper to bumper" coverage. Saab Cars USA, Inc. offers an extended warranty for 6 years or 100,000 miles, whichever comes first, for vehicles manufactured for sale or lease in the United States.

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.

Saab Cars USA, Inc. has issued the Modification Instruction (M1234-2514en) related to the Recall Campaign 04V-557. Saab Cars USA, Inc. has not published additional technical service bulletins related to fuel leakage in 2001 model year (MY), Saab 9-3 vehicles. Also, Saab Cars USA does not plan to issue any further technical service bulletins related to the fuel pumps or fuel line retaining tabs within the next 120 days. The Modification Instruction is included in the Attachment 1 CD, in the folder Response to Q7.

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. This should include all

such actions related to GM's defect determination associated with the subject recall. 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.

The information listed in Table 8-1 below is a summary of actions performed by Saab regarding the subject condition on the 2001 MY Saab 9-3 vehicles. Original and translated documents and supporting information is included in the Attachment 1 CD, Response to Q8 folder.

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| <p>Action: Validation - Fuel Pump Bracket Start Date: June 11, 1992 End Date: August 24, 1992 Engineering Group: Saab Engineering / Supplier Attachment: Attachment 1 CD, Response to 8a (Bracket Validation report TDG-UR-N071, Bracket Validation Task_TDG-U-284 SWEDISH original documents.pdf, Ref to Pre-Production Validation report TDG-UR-N071.doc and Ref to Pre-Production Validation task TDG-U-284.doc) Description: Fuel pump bracket added for snap on lid of electrical contact and fuel lines on pump installation. Summary of Action: Fuel pump bracket was installed on several test vehicles and miles accumulated to validate component change.</p> |
| <p>Action: Letter - Saab to Component Supplier Start Date: April 17, 1998 End Date: April 17, 1998 Engineering Group: Saab Engineering/ Supplier Attachment: Attachment 1 CD, Response to 8b (Supplier - Bracket Analysis.pdf and Supplier - Bracket Analysis T.doc) Description: Retaining Tab Manufacturing Process Summary of Action: Saab requested supplier information regarding material quality assurance, performance testing and quality assurance tests performed on the retaining tab bracket.</p> |
| <p>Action: Meeting Minutes - Saab and fuel line bracket supplier meeting minutes Start Date: April 22, 1998 End Date: April 22, 1998 Engineering Group: Saab Engineering / Supplier Attachment: Attachment 1 CD, Response to 8c (Saab Supplier Meeting Minutes 1998_04_22.pdf and Translated Saab Supplier Meeting Minutes 1998_04_22.doc) Description: Retaining Tab bracket discussion Summary of Action: Saab Engineering met with bracket supplier to discuss retaining tab operation in field vehicles.</p> |
| <p>Action: Bracket Impact Testing Start Date: Unknown End Date: Unknown Engineering Group: Saab Engineering / Supplier Attachment: Attachment 1 CD, Response to 8d (Supplier Impact test made at bracket 4382857 .pdf) Description: Retaining Tab Bracket Impact Testing Summary of Action: Bracket supplier performed impact testing on bracket tabs made of different types of materials.</p> |

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| <p>Action: TVLM-98-0269 Start Date: July 22, 1998 End Date: July 22, 1998 Engineering Group: Saab Engineering Attachment: Attachment 1 CD, Response to 8a (98025901.doc and 980259T.doc) Description: Retaining Tab Material Comparison Testing Summary of Action: Five types of plastic are compared to determine which may perform the best for retaining tab application. Also, impact testing of several types of plastics at multiple ambient temperatures.</p> |
| <p>Action: TVLM-02-198 Start Date: May 3, 2002 End Date: May 3, 2002 Engineering Group: Saab Engineering Attachment: Attachment 1 CD, Response to 8f (02019801.doc and 020198T.doc and DP02007.pdf) Description: Component Inspection (PIR DP02007 Australia) Summary of Action: Components inspected from two cases where the retaining tabs failed. It was determined that the material handling process may have initiated the issue.</p> |
| <p>Action: TVLM-02-224 Start Date: May 28, 2002 End Date: May 28, 2002 Engineering Group: Saab Engineering Attachment: Attachment 1 CD, Response to 8g (02022401.doc and 020224T.doc) Description: Component testing of the yellow plastic material used for the retaining tabs. Summary of Action: Cyclical testing and static bending of the material used for the retaining tabs. No cracks in the tabs appeared during testing.</p> |
| <p>Action: TVLM-02-381 Start Date: October 2, 2002 End Date: October 2, 2002 Engineering Group: Saab Engineering Attachment: Attachment 1 CD, Response to 8h (02038101.doc and 020381T.doc) Description: Examine broken retaining tabs from field. Summary of Action: Broken field sample retaining tabs (pressure side) were examined to determine if a difference exists in the brittleness or material strength for failed and non-failed retaining tabs. Both tabs appeared to perform similarly.</p> |
| <p>Action: TVLM-02-505 Start Date: November 28, 2002 End Date: November 28, 2002 Engineering Group: Saab Engineering Attachment: Attachment 1 CD, Response to 8j (02050501.doc and 020505T.doc) Description: Heat aging of Fuel Line Retaining Tab in Fuel Vapor Summary of Action: Retaining tab material testing to determine the resistance or effect of exposure to different chemicals.</p> |
| <p>Action: TVLM-03-129 Start Date: March 15, 2003 End Date: March 15, 2003 Engineering Group: Saab Engineering Attachment: Attachment 1 CD, Response to 8k (03012901.doc and 030129T.doc) Description: Testing of plastic materials in acidic M15 Summary of Action: Retaining tab material testing to determine the resistance or effect of acidic M15 fuel. No cracks were visible after test.</p> |
| <p>Action: FPER Report and Warranty Analysis Start Date: September 20, 2004 End Date: September 20, 2004 Engineering Group: Saab Engineering Attachment: Attachment 1 CD, Response to 8l (FPER Pump retaining tabs 9-3 NYS ed2.doc, WTY_36_MIS_24110_23420 (US).pdf) Description: Field Performance Evaluation Report Summary of Action: Saab Engineering evaluated reports and performed warranty analysis of fuel pump retaining tab failure on the subject vehicles. It was determined that the transport carts and handling process of the fuel tanks and lines caused the tabs to break prematurely. The carts and process was modified and the recall campaign was launched for the suspected population.</p> |

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| <p>Action: Fuel Pump Warranty Analysis Start Date: December 21, 2005 End Date: December 21, 2005 Engineering Group: Saab Engineering Attachment: Attachment 1 CD, Response to 8m (Warranty data Clip Broken.pdf) Description: Warranty analysis of fuel line retaining tab failure. Summary of Action: Warranty analysis of fuel pump/fuel line retaining tab failures in Saab vehicles produced in the Uusikaupunki, Finland and Trollhättan, Sweden assembly plants.</p> |
| <p>Action: Ongoing Fuel Pump Warranty Analysis Start Date: February 28, 2006 End Date: TBD Engineering Group: Saab Engineering Attachment: Not available at this time Description: Additional warranty analysis of fuel line retaining tab failure. Summary of Action: Warranty analysis of fuel pump/fuel line retaining tab failures in Saab vehicles produced in the Trollhättan, Sweden assembly plant.</p> |

Table 8-1

Saab is determining if additional information is available from suppliers of the fuel pump and retaining tab bracket. If additional information is found, this response will be supplemented.

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 components from Job #1 of the first model year of Saab 9-3 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.

GM is providing a summary of the Saab product engineering information requested in 9(a-h), along with copies of the Product Improvement Process (PIP) documents in Attachment 1 CD, folder labeled: "Response for Q8."

GM and Saab are 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. Produce one of each of the following:

- a. An exemplar sample of each design version of the subject component;

- b. **One representative field return sample of the subject components exhibiting the subject failure mode (this should include both the retaining tab and fuel line failure); and**
- 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.**

As requested, GM is providing two field return (yellow retaining tab bracket) fuel pumps and a new replacement fuel pump (white retaining tab bracket). GM is also providing the retaining clip service component used in the Recall Campaign 04V-557.

- 11. **Provide photographs, design drawings and (if available) computer modeling images showing the subject components, the fuel tank assembly and a shell of the vehicle body. Identify the retaining tabs associated with the defect condition cited in the subject recall and, in separate photographs/drawings/images show the location of the bracket used as a remedy in the recall.**

GM is providing photographs and drawings of the fuel pump/retaining tabs, the fuel lines, the fuel tank assembly, and the bracket used in the recall campaign as requested. The documents are provided in Attachment 1 CD in the folder labeled "Response to Q11."

- 12. **Provide photographs of all transport carts used in the assembly of the fuel systems in the subject vehicles, and all other vehicles equipped with the subject components, and a detailed description of how the carts may have contributed to fuel line retaining tab damage during the assembly process for vehicles subject to Recall 04V-557. Describe all differences in the transport carts and assembly processes used at the plant associated with Recall 04V-557 before, during and after the recall production range. Describe all differences in the transport carts and assembly processes used at the plant associated with Recall 04V-557 during the recall production range and those used at the Trollhattan, Sweden assembly plant. Provide videos (or numbered sequential photographs) showing the differences between the transport carts and assembly processes used at each plant.**

The FPER report (Filename: FPER Pump retaining tabs 9-3 NYS ed2.doc) included in Response to Question 8, includes information stating the differences between the fuel tank handling process at the two plants. Additional drawings, photographs or other information regarding the fuel tank transport carts is not available.

Regarding the information requested for the transport carts and assembly process used at the Finland assembly plant.

Saab Automotive used a contracted manufacturer to assemble the subject vehicles. The manufacturer used was not associated to GM in any way. The vehicle manufacturing contract was terminated in 2003 because the vehicles were no longer produced. At the time of the original FPE investigation (after the manufacturing contract expired), no documents regarding the transport carts were available.

Regarding the information requested for the transport carts and assembly process used at the Trollhattan assembly plant.

The transport cars used in the Trollhättan production facility were scrapped in late 2002 when the next generation 9-3 (Epsilon) was introduced. The 2003 MY Saab 9-3 (Epsilon platform) utilizes different manufacturing processes than those used to produce the 2001 MY Saab 9-3 vehicles. Pictures, drawings and assembly processes for the transport carts are not available.

13. State the number of subject components that GM has sold that may be used in the subject vehicles by state, part number (both service and engineering/production), model 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). If part sales data cannot be provided by state, provide it by part distribution center with a description of the region covered by each center.

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.

A summary of the requested service part information for the subject component is provided in Attachment 1 CD GM, folder labeled "Response for Q13; in the file Part Sales.doc". The data was last gathered on February 24, 2008.

The sales numbers provided in the table represent part sales to dealers in the US. This data has limited analytical value in analyzing the field performance of the subject 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.

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

- a. The causal or contributory factor(s), including a detailed assessment of the factors affecting the occurrence fuel pump fuel line retainer tab failure;
- 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.

In August 2004, Saab Automobile AB was notified by Saab Cars USA that the number of fuel pump retaining tab failures was increasing. Saab Engineering determined that the 2001 - 2002 MY Saab 9-3 vehicles produced at the Uusikaupunki, Finland assembly plant had an elevated warranty rate when compared to the rate for vehicles produced in the Trollhättan, Sweden plant (Response to Question 8I). In October 2004, Saab Automobile AB determined that the subject condition was caused by the design of the transport cart that had been utilized only at the Uusikaupunki, Finland assembly plant. It was determined that the transport carts contacted the fuel pump/fuel tank assembly, causing microscopic cracks in the fuel line retaining tabs. Saab Engineering believes that over time, vibration and upward pressure from the fuel line can cause the retaining tab cracks to propagate and eventually fracture. As a result of the investigation, the transport carts were redesigned for the 2003 model year. In April 2003, the manufacturing

of Saab vehicles in the Uusikaupunki, Finland assembly plant was terminated. In November 2004, GM announced the Recall Campaign 04V-657 as a result of incidents and warranty analysis of fractured fuel pump retaining clips on the subject vehicles built at the Uusikaupunki, Finland assembly plant.

In addition to the condition caused by the transport carts, Saab has determined that additional theoretical, unconfirmed factors may contribute to fracture of the fuel line retaining tabs. These may include:

- Bending of the tabs beyond their elastic limit causing microscopic cracks during the fuel pump assembly or transport process and also during repairs made by field service technicians.
- Material brittleness due to possible unstable supplier manufacturing process in combination with component field exposure.

Saab has determined that the failure mechanism occurs over time after initial microscopic cracks in the retaining tab propagate due to the fuel line pressure.

Two failure modes exist:

1. The most common failure mode occurs with the pressure side fuel line at vehicle start-up.
 - The pressure side fuel line may leak slowly, allowing the engine to start. When the engine starts, reduced fuel system pressure is detected by the Engine Management System (EMS) and a "Check Engine" light is immediately illuminated.
 - When the pressure side fuel line is fully separated from the fuel pump and the ignition is turned to "on", the fuel pump will run for 1.5 seconds. After 1.5 seconds, the EMS will detect loss of fuel system pressure and the fuel pump will stop and the engine will not start.
2. A less likely failure mode occurs with the return fuel line at vehicle start-up.
 - When a small leak occurs with the return fuel line, the engine will start and run. The vehicle may operate until the fuel is used by the engine or leaks from the return fuel line. With driving, over time, the operator may detect a strong fuel odor, observe a "Refuel/Low Fuel" lamp illuminated on the instrument panel and notice a fuel spill near the rear of the vehicle. When the return fuel line separates completely, the result will be similar but occur at an increased rate.

Customer complaints and warranty claims state the customers detect a strong fuel odor and fuel leaks at the rear of the vehicle. There have been no reports of stalling during this investigation. Additionally, when the EMS detects low fuel system pressure due to leakage, the "Check Engine" light illuminates and a diagnostic cycle is initiated to check standardized parameters and fault codes are stored in the EMS.

NHTSA has provided a total of 6 Vehicle Owner Questionnaires (VOQ's) with this request. GM has reviewed the documents but has not communicated with the consumers. Although the condition described is similar to the subject condition, GM was not able to inspect any of the failed components and is therefore not able to determine if the incident is the same as the subject condition.

GM and Saab have not completed their risk analysis. There are no reports of fires, injuries, fatalities, crashes or property damage as a result of the alleged condition. GM and Saab are continuing their analysis of the field data included in this response.

* * *

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 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 January 1, 1999, 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:
Attachment 1 CD
Exemplar parts



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

JAN 10 2005

Ent-685

400 Seventh Street, S.W.
Washington, D.C. 20390

*Original
Received
1-17-06*

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Ms. Gay P. Kent, Director
Product Investigations
General Motors Corporation
30200 Mound Road - Mail Code 480-111-E18
Warren, MI 48090-9010

NVS-213cia
RQ05-003

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 Recall Query (RQ05-003) to investigate allegations of fuel leakage in certain model year (MY) 2001 Saab 9-3 vehicles manufactured by General Motors (GM), and to request certain information.

On November 19, 2004, GM notified ODI of a defect condition that could result in fuel leakage at the fuel pump connections in approximately 17,400 MY 2001 and 2002 Saab 9-3 passenger vehicles built at the Uusikaupunki, Finland assembly plant between May 2000 and July 2002 (NHTSA Recall No. 04V-557, Saab No. 15018, GM No. 04101). According to GM, plastic fuel pump retaining tabs holding the fuel lines were damaged during the manufacturing process for some of the 9-3 vehicles built at the Finland plant. GM indicated that, over time, this could cause the fuel lines to loosen from the pump resulting in fuel leakage which, in the presence of an ignition source, could cause a vehicle fire. The recalled vehicles were fitted with a securing bracket to hold the fuel lines to the fuel pump even if the retaining tabs should break.

The Office of Defects Investigations (ODI) has received seven complaints from owners of MY 2001 SAAB 9-3 vehicles manufactured at the Trollhattan, Sweden assembly plant that were not included in Recall 04V-557, which allege incidents of fuel leakage at the fuel pump module that may be related to the defect addressed by the recall. A copy of each of the reports is enclosed for your information - see Enclosure 1, "Data Collection Disk and VOQ Files", file "RQ05-003 VOQs".

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

- **Subject vehicles:** all MY 2001 Saab 9-3 passenger vehicles manufactured for sale or lease in the United States.



Subject recall: NHTSA Recall No. 04V-557.



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888-DASH-2-DOT
888-327-4238

- **Subject components:** The fuel supply and return line assemblies, including all associated retaining tabs and other retention devices, used in 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 January 1, 1999, 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:** Fuel line leakage or fuel line retaining tab failure.
- **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 vehicles equipped with the subject components that GM has manufactured for sale or lease in the United States. Separately, for each such vehicle manufactured to date by GM, state the following:
 - a. Vehicle identification number (VIN);
 - b. Make;
 - c. Model;
 - d. Model Year;
 - e. Plant of manufacture;
 - 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 2003, or a compatible format, entitled "PRODUCTION DATA." See Enclosure 1, Data Collection Disc, for a pre-formatted table that provides further details regarding this submission.

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, and all other vehicles equipped with the subject components, and which were received by GM:
 - 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.

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 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 2003, 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.

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 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, and all other vehicles equipped with the subject components, including repair or replacement of the fuel pump or fuel line retainer tabs: warranty claims; extended warranty claims; claims for good will services that were made in accordance with the procedure specified in safety recall 04V577 ; field, zone, or similar adjustments and reimbursements; and warranty claims or repairs made.

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 2003, 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.

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. This should include all such actions related to GM's defect determination associated with the subject recall. 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 components from Job #1 of the first model year of Saab 9-3 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. An exemplar sample of each design version of the subject component;
 - b. One representative field return sample of the subject components exhibiting the subject failure mode (this should include both the retaining tab and fuel line failure); and
 - 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.
11. Provide photographs, design drawings and (if available) computer modeling images showing the subject components, the fuel tank assembly and a shell of the vehicle body. Identify the retaining tabs associated with the defect condition cited in the subject recall and, in separate photographs/drawings/images show the location of the bracket used as a remedy in the recall.
12. Provide photographs of all transport carts used in the assembly of the fuel systems in the subject vehicles, and all other vehicles equipped with the subject components, and a detailed description of how the carts may have contributed to fuel line retaining tab damage during the assembly process for vehicles subject to Recall 04V-557. Describe all differences in the transport carts and assembly processes used at the plant associated with Recall 04V-557 before, during and after the recall production range. Describe all differences in the transport carts and assembly processes used at the plant associated with Recall 04V-557 during the recall production range and those used at the Trollhattan, Sweden assembly plant. Provide videos (or numbered sequential photographs) showing the differences between the transport carts and assembly processes used at each plant.
13. State the number of subject components that GM has sold that may be used in the subject vehicles by state, part number (both service and engineering/production), model 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*). If part sales data cannot be provided by state, provide it by part distribution center with a description of the region covered by each center.

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.

14. Furnish GM's assessment of the alleged defect in the subject vehicle, including:
 - a. The causal or contributory factor(s), including a detailed assessment of the factors affecting the occurrence fuel pump fuel line retainer tab failure;
 - 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.

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 \$5,000 per day, with a maximum of \$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 March 1, 2006. Please refer to RQ05-003 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) 366-5207 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 Chris Lash of my staff at (202) 366-2370.

Sincerely,

A handwritten signature in black ink, appearing to read "Jeffrey L. Quandt". The signature is fluid and cursive, with a large initial "J" and "Q".

Jeffrey L. Quandt, Chief
Vehicle Control Division
Office of Defects Investigation

Enclosure: One CD ROM titled Data Collection Disc and VOQs containing four files

**GM685
RQ05-003**

ATTACHMENT "1"
GM NON-CONFIDENTIAL MATERIAL