



Handwritten:
2/12/07

February 9, 2007

Kathleen C. DeMeter, Director
Office of Defects Investigation
NHTSA Enforcement
Room #5326
400 Seventh Street, S.W.
Washington, D.C. 20590

N060233

NVS-213swmc
EA06-010

Dear Ms. DeMeter:

This letter is General Motors' (GM) response to your information request (IR), dated December 12, 2006, regarding an Engineering Analysis (EA06-010) to investigate allegations that fuel tanks may puncture from contact with road debris in 2004 through 2006 Model Year (MY) Chrysler Pacifica vehicles.

As requested, GM is providing information regarding 2004-2006 MY Cadillac CTS, SRX, and 2005-2006 MY Cadillac STS models manufactured for sale or lease in the United States.

Your questions and our corresponding replies are as follows:

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

Provide the table in Microsoft Access 2000, or a compatible format, entitled "PRODUCTION DATA." See Enclosure 1, Data Collection Disc, for a pre-formatted table which 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	2004 MY	2005 MY	2006MY	Total
Cadillac	CTS	55,985	61,324	55,066	172,375
Cadillac	SRX	31,015	23,501	24,438	78,954
Cadillac	STS	N/A	37,229	31,372	68,601
Total		87,000	122,054	110,876	319,930

TABLE 1 - VEHICLE PRODUCTION
VEHICLE PRODUCTION DATED JANUARY 5, 2007.
N/A - NOT APPLICABLE



The production information requested in 1a-1g 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 1g. In response to question 1h, the fuel tank shielding is similar for the three subject vehicles and is included in response to Question 7. 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 subject condition in the subject peer 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 peer 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 peer vehicle, property damage claims, consumer complaints, or field reports;**
 - e. **Property damage claims;**
 - 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 could relate to the subject condition. GM has found no field reports or customer complaints with vehicles exhibiting the subject 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	0	N/A	0	0	0	0
Field Reports	0	N/A	0	0	0	0
Not-In-Suit Claims	0	N/A	0	0	0	0
Subrogation Claims	0	N/A	0	0	0	0
Third Party Arbitration Proceedings	0	N/A	0	0	0	0
Product Liability Lawsuits	0	N/A	0	0	0	0
Total Reports (Including Duplicates)	0	N/A	0	0	0	0
Total Vehicles with Reports (Unique VIN)	0	N/A	0	0	0	0

TABLE 2-1: REPORT BREAKDOWN
 N/A - NOT APPLICABLE

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

SOURCE SYSTEM	LAST DATE GATHERED
Customer Assistance Center	1/24/2007
Technical Assistance Center	1/19/2007
Company Vehicle Evaluation Program (CVEP)	1/19/2007
Corporate Test Fleet (CTF)	1/19/2007
Early Quality Feedback (EQF)	1/19/2007
Legal / Employee Self Insured Services (ESIS)	1/19/2007

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 2000, or a compatible format, entitled "REQUEST NUMBER TWO DATA." See Enclosure 1, Data Collection Disc, for a preformatted table which provides further details regarding this submission.

GM has found no field reports or customer complaints related to the subject condition.

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.**

GM has found no records related to the subject condition in the subject vehicles, and is therefore unable to provide information regarding this request.

5. **State, by make, 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 subject condition in the subject peer 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. Vehicle owner or fleet mailing address
- d. Vehicle Make;
- e. Vehicle Model;
- f. Vehicle Model Year;
- g. VIN;
- h. Repair date;
- i. Vehicle mileage at time of repair;
- j. Repairing dealer's or facility's name, telephone number, city and state or ZIP code;
- k. Labor operation number;
- l. Problem code;
- m. Replacement part number(s) and description(s);
- n. Concern stated by customer; and
- o. Complaint, cause, correction and comments, if any, by dealer/technician relating to claim and/or repair.

Provide this information in Microsoft Access 2000, or a compatible format, entitled "WARRANTY DATA." See Enclosure 1, Data Collection Disc, for a pre-formatted table which provides further details regarding this submission.

A summary of the warranty claim for fuel tank damage from road debris is shown in Tables 5A and 5B below.

REGULAR WARRANTY CLAIMS FOR FUEL TANK DAMAGE FROM ROAD DEBRIS

MAKE	MODEL	2004 MY	2005 MY	2006 MY	TOTAL
Cadillac	CTS	1	0	0	1
Cadillac	SRX	0	0	0	0
Cadillac	STS	N/A	0	0	0
	TOTAL	1	0	0	1

TABLE 5A

EXTENDED WARRANTY CLAIMS FOR FUEL TANK DAMAGE FROM ROAD DEBRIS

MAKE	MODEL	2004 MY	2005 MY	2006 MY	TOTAL
Cadillac	CTS	0	0	0	0
Cadillac	SRX	0	0	0	0
Cadillac	STS	N/A	0	0	0
	TOTAL	0	0	0	0

TABLE 5B
N/A - NOT APPLICABLE

GM searched the GM North America Claim Adjustment Retrieval Database (CARD-regular warranty), the Motors Insurance Corporation (MIC – extended warranty), and the Universal Warranty Corporation (UWC – extended warranty) databases using the labor codes and trouble codes listed in Tables 6A and 6B. The search revealed 14 claims that met the search criteria. GM called the servicing dealers and reviewed the repair orders and found one (1) warranty claim that may be related to the subject condition. The thirteen (13) other warranty claims stated that fuel tanks were replaced for issues related to vehicle diagnostic codes, fuel level indication and other miscellaneous issues.

The single (1) warranty claim is included on the Attachment 1 CD; refer to the folder labeled, "Response to Q5." Refer to the Microsoft Access 2000 file labeled: "WARRANTY DATA"

GM's warranty database does not contain the following information: vehicle owner's name or telephone number, replacement part number description, or customer concern statement. GM is providing a field labeled "Verbatim Text" in response to request 5m (dealer/technician comment). The verbatim text is an optional field in the GM warranty system for the dealer to enter any additional comments that may be applicable to the warranty claim. GM does not require the verbatim text field to be completed for every warranty claim.

The warranty data provided has limited analytical value in analyzing the field performance of a motor vehicle component. The warranty records do not contain sufficient information to establish the condition of the part at the time of the warranty correction; and service personnel may not consistently use the appropriate labor and trouble codes. Warranty numbers represent claims by our dealers for reimbursement for parts and labor costs incurred in performing warranty service for our customers.

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 subject condition in the subject peer vehicles. State, by make and model year, the terms of the new vehicle warranty coverage offered by GM on the subject peer 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 peer vehicles and state by option, model, and model year, the number of vehicles that are covered under each such extended warranty.

The GM regular warranty and MIC extended warranty claims that may relate to the subject condition were collected by searching for the labor codes listed in Table 6A below. The list of trouble codes used during the search is included in Table 6B below. Universal Warranty Corporation (UWC) does not use labor codes or trouble codes. The UWC extended warranty claims were collected by searching for the alleged defect.

LABOR CODE	DESCRIPTION:
L1260	Tank, Fuel, Replace
L1280	Tank, Fuel - Right - Replace
L1281	Tank, Fuel - Left - Replace
L1282	Tank, Fuel - Both - Replace
L1288	Tank, Fuel - Rear Tank - Replace

TABLE 6A LABOR CODES USED IN WARRANTY SEARCH

TROUBLE CODE	DESCRIPTION
1A	BENT
1D	BROKEN
1J	COLLAPSED
1K	CRACKED
1M	DENTED
3W	PUNCTURED
3Z	RUPTURED
4D	SHEARED

TABLE 6B TROUBLE CODES USED IN WARRANTY SEARCH

GM covers the 2004–2006 MY Cadillac CTS, SRX and STS by a bumper-to-bumper new vehicle warranty for four years or 50,000 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 General Motor's warranty system does not contain information on the number of vehicles that have extended warranty coverage.

- 7. Provide the following information concerning the subject peer vehicles fuel tank assemblies:**
- a. Drawings showing the design ground clearance of the subject peer fuel tank assembly;**
 - b. Identify all subject peer vehicle components that have lower ground clearances than the subject peer fuel tanks and state the location and ground clearance for each;**
 - c. Provide a bottom view drawing or picture showing the undercarriage of the subject peer vehicle in the fully built configuration with the fuel tank and the locations of all components identified in "8.b";**
 - d. Copies of all engineering specifications relating to the packaging, shielding, ground clearance, and/or puncture resistance of the subject peer fuel tanks;**
 - e. Copies of all engineering standards, design guides or similar documents that relate in any way to the packaging, shielding, ground clearance and/or puncture resistance of fuel tanks in passenger cars or light trucks;**
 - f. State what material the subject peer fuel tank is composed of (e.g., HDPE plastic); and**
 - g. State the supplier and/or maker of the subject peer fuel tank assemblies.**

GM's response to Question 7, a – g are as follows:

- a. The drawings showing the design ground clearance of the subject fuel tank assembly in the subject vehicles is included in the in the Attachment 2 CD GM Confidential, in the folder labeled, "Response for Q7". Additional photos of the subject vehicle underbody and related components are also included on the Attachment 1 CD; refer to the folder labeled, "Response to Q7."
- b. The drawings showing components that have a lower ground clearance than the subject fuel tank is included in the in the Attachment 2 CD GM Confidential, in the folder labeled, "Response for Q7".
- c. The bottom view drawing showing components that have a lower ground clearance than the subject fuel tank is included in the in the Attachment 2 CD GM Confidential, in the folder labeled, "Response for Q7".
- d. The engineering specifications relating to the packaging shielding, ground clearance and/or puncture resistance is provided on the Attachment 2 CD GM Confidential; refer to the folder labeled "Response to Q7" and on the Attachment 1 CD; refer to the folder labeled, "Response for Q7".
- e. The engineering standards and design guidelines related to the packaging, shielding, ground clearance and puncture resistance of the fuel tanks installed in the subject vehicles is provided on the Attachment 2 CD GM Confidential; refer to the folder labeled "Response to Q7".
- f. The fuel tank used in the 2004 through 2006 Cadillac CTS, SRX, and 2005 to 2006 Cadillac STS vehicles is constructed of a High Density Polyethylene (HDPE) material.
- g. The name of the supplier and/or maker of the fuel tanks for the 2004 through 2006 Cadillac CTS, SRX, and 2005 to 2006 Cadillac STS vehicles is provided on the Attachment 1 CD; refer to the folder labeled, "Response to Q7."

* * *

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.

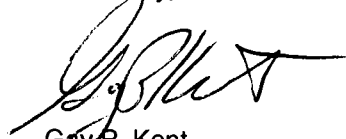
This response is based on searches of General Motors Corporation (GM) locations where documents determined to be responsive to your request would ordinarily be found. As a result, the scope of this search did not include, nor could it reasonably include, "all of their divisions, subsidiaries (whether 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 GM (including all business units and persons previously referred to), who are or, in or after January 1, 2000, were involved in any way with any of the following related to the subject condition in the subject peer 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:

**N060233
EA06-010**

GM CONFIDENTIALITY LETTER

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

**N060233
EA06-010**

ATTACHMENT "1"

GM NON-CONFIDENTIAL MATERIAL

**N060233
EA06-010**

ATTACHMENT "2"

GM CONFIDENTIAL MATERIAL

**GM CONFIDENTIAL MATERIAL
HAS BEEN REMOVED FROM THIS
ATTACHMENT AND SUPPLIED TO
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