



March 12, 2008

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Office of Defects Investigation
National Highway Traffic Safety Administration
1200 New Jersey Ave., S. E., Room W46-409
Washington, D.C. 20590

N070035A Supplement 5

NVS-213kmb
PE07-006 / EA07-008

Dear Ms. DeMeter:

This letter is General Motors' (GM) response to your request on March 5, 2008 regarding 3.8L (L67) under hood fire incident reports for 1999-2002 Model Year H-car (Pontiac Bonneville SSEi) vehicles.

The 3.8L (L67) Pontiac Bonneville SSEi (supercharged engine) incident reports of under hood fires were submitted to NHTSA in response to IRs PE07-006 and EA07-008 because they met the alleged defect as described by NHTSA (non-crash related fire originating in the engine compartment). Based upon the knowledge GM has gained as a result of its investigation, including inspecting and testing vehicles, the H-car incident reports were reviewed again on March 5, 2008. The review resulted in some of the H-car incident reports to be excluded because the information contained in the reports was inconsistent with the incident characteristics associated with the determined root cause.

Table 1 below summarizes the number of 3.8L (L67) Pontiac Bonneville SSEi incident reports by model year.

REPORTS OF UNDER HOOD FIRES ON 3.8L (L67) PONTIAC BONNEVILLE SSEI VEHICLES

| | 1999 | 2000 | 2001 | 2002 | Total |
|---|------|------|------|------|-------|
| PE07-006 / EA07-008 Incident Reports Submitted to NHTSA | 0 | 6 | 5 | 2 | 13 |
| PE07-006 / EA07-008 Incident Reports after March 5, 2008 Review | 0 | 3 | 0 | 1 | 4 |

TABLE 1 - 3.8L (L67) PONTIAC BONNEVILLE SSEI INCIDENT REPORTS

Explanation of Differences:

MY 2000: Three reports were removed as a result of further review.

- One report had a detailed inspection with photographs that indicated the incident was due to a loose wire between the battery and alternator. In addition, the vehicle only had 600 miles at the time of the incident. This mileage is inconsistent with the trend associated with the cause of the incident in this investigation.
- One report was for a vehicle with 24,000 miles. The rocker cover gasket had been replaced eight months prior to the incident. This mileage and recent gasket replacement are inconsistent with the trend associated with the cause of the incident in this investigation. NOTE: This incident was previously discussed with the NHTSA since it referenced a structure being involved. Review of the vehicle by a GM investigator indicated the burn pattern was inconsistent with the trend associated with the cause of the incident in this investigation. The GM investigator believes this fire was due to a leaking transmission oil cooler line.

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- One report was for a vehicle with 25,839 miles. This mileage is inconsistent with the trend associated with the cause of the incident in this investigation.

The remaining three reports can not be excluded due to limited available information. One vehicle had 77,000 miles at the time of the incident, and the mileage of the other two vehicles is unknown.

MY 2001: Five reports were removed as a result of further review.

- Three reports have mileages that are inconsistent with the trend associated with the cause of the incident in this investigation. The vehicles had incidents at 8000 miles, 18,642 miles, and 31,355 miles.
- One incident was reported to have started 45 minutes after the vehicle was parked. The damage was such that the vehicle could be driven post incident. The customer also reported that a second incident occurred after the vehicle was driven home. Smoke was observed from under hood one and one half hours after the vehicle was parked. Those observations are inconsistent with the trend associated with the cause of the incident in this investigation.

- One report stated that just prior to the incident, the vehicle heater reportedly malfunctioned. If the incident was due to engine oil leaking from the rocker cover, the vehicle heating system should not be affected.

MY 2002: One report was removed as a result of further review.

- This report stated that the vehicle had 26,000 miles at the time of the incident. This mileage is inconsistent with the trend associated with the cause of the incident in this investigation. NOTE: This incident was previously discussed with the NHTSA since it was the subject of a VOQ.

There is insufficient information to exclude the other report. However, that incident occurred at 47,850 miles which is below the mileages typically observed on vehicles that GM has inspected.

If you require additional information, please don't hesitate to contact me.

Sincerely,



Gay P. Kent
Director

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