



*Full
5/5/08*

April 30, 2008

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

N070076B

NVS-212am
EA07-009

Dear Ms. DeMeter:

This letter is General Motors (GM) response to your information request (IR), dated March 26, 2008, regarding allegations of the fuel pump module leaking gasoline in MY 2002-2003 Chevrolet Trailblazer, Trailblazer EXT, GMC Envoy, Envoy XL, Envoy XUV vehicles.

In response to your request, GM is providing additional reports and claims for the MY 2002-2003 Chevrolet Trailblazer, Trailblazer EXT, GMC Envoy, Envoy XL, Envoy XUV vehicles received since GM's last response to EA07-009 on October 24, 2007.

GM is also providing reports and claims received for the MY 2004 Chevrolet Trailblazer, Trailblazer EXT, GMC Envoy, Envoy XL, Envoy XUV, and the MY 2002-2004 Isuzu Ascender, Buick Rainer and Oldsmobile Bravada vehicles manufactured for sale or lease in the United States.

GM did not produce the Saab 9-7x during the 2002-2004 model years.

GM does not believe that this condition poses an unreasonable risk to motor vehicle safety because:

- Owners may notice fuel odors from leaks in the MRA feed and return.
- The vehicle design minimizes the potential for fuel contact with ignition sources.
- As reported in the EA07-009, the incident leak rate for MRA feed and return pipes caused by corrosion is approximately 0.6 IPTV for 5 years of exposure.
- With the additional vehicles and claims, the incident rates remain very low at less than 0.2 IPTV for the extended warranty claims.
- To date, GM is not aware of any fires related to this condition.

Your questions and our corresponding replies are as follows:

1. **State the number of each of the following, received by GM, or of which GM is otherwise aware, which relate to, or may relate to, the alleged defect in the subject vehicles:**
 - a. **Consumer complaints, including those from fleet operators;**
 - b. **Field reports, including dealer field reports;**
 - c. **Reports involving a crash, injury, or fatality, based on claims against the manufacturer involving a death or injury, notices received by the manufacturer alleging or proving that a death or injury was caused by a possible defect in a subject vehicle, property damage claims, consumer complaints, or field reports;**
 - d. **Reports involving a fire, based on claims against the manufacturer involving a death or injury, notices received by the manufacturer alleging or proving that a death or injury was caused by a possible defect in a subject vehicle, property damage claims, consumer complaints, or field reports;**

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- 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 "e," 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.

Tables 1-1 and 1-2 below summarize the records that may relate to the subject condition. GM has organized the records by the GM file number within each attachment. GM is providing 9 reports in response to EA07-009 that may be related to the alleged condition. GM determined that 3 of the 9 reports may be related to corrosion of the MRA feed and return pipes.

TYPE OF REPORT	GM REPORTS*	SUBCATEGORIES			
		CORRESPONDING TO NHTSA REPORTS	NUMBER WITH PROPERTY DAMAGE	NUMBER WITH CRASH	NUMBER WITH INJURIES/FATALITIES
Owner Reports	6	0	0	0	0
Field Reports	3	0	0	0	0
Not-In-Suit Claims	0	0	0	0	0
Subrogation Claims	0	0	0	0	0
Third Party Arbitration Proceedings	0	0	0	0	0
Product Liability Lawsuits	0	0	0	0	0
Total Reports (Including Duplicates)	9	0	0	0	0
Total Vehicles with Reports (Unique VIN)	9	0	0	0	0

TABLE 1-1: REPORT BREAKDOWN FOR SUBJECT VEHICLES FOR ANY FUEL PUMP LEAKAGE

*GM HAS NOT IDENTIFIED ANY REPORTS THAT INVOLVED A FIRE

TYPE OF REPORT	GM REPORTS*	SUBCATEGORIES			
		CORRESPONDING TO NHTSA REPORTS	NUMBER WITH PROPERTY DAMAGE	NUMBER WITH CRASH	NUMBER WITH INJURIES/FATALITIES
Owner Reports	3	0	0	0	0
Field Reports	0	0	0	0	0
Not-In-Suit Claims	0	0	0	0	0
Subrogation Claims	0	0	0	0	0
Third Party Arbitration Proceedings	0	0	0	0	0
Product Liability Lawsuits	0	0	0	0	0
Total Reports (Including Duplicates)	3	0	0	0	0
Total Vehicles with Reports (Unique VIN)	3	0	0	0	0

TABLE 1-2: REPORT BREAKDOWN FOR SUBJECT VEHICLES WITH FUEL PUMP LEAKS DUE TO PERFORATION CAUSED BY CORROSION

*GM HAS NOT IDENTIFIED ANY REPORTS THAT INVOLVED A FIRE

The sources of the requested information and the last date the searches were conducted are tabulated in Table 1-2 below.

SOURCE SYSTEM	LAST DATE GATHERED
Customer Assistance Center	4/9/2008
Technical Assistance Center	4/22/2008
Field Information Network Database (FIND)	4/1/2008
Company Vehicle Evaluation Program (CVEP)	4/22/2008
Field Product Report Database (FPRD)	4/10/2008
Legal / Employee Self Insured Services (ESIS)	4/11/2008

TABLE 1-2: DATA SOURCES

2. Separately, for each item (complaint, report, claim, notice, or matter) within the scope of your response to Request No. 1, state the following information:
 - a. GM's file number or other identifier used (where there is an Isuzu or Saab file number, so state);
 - b. The category of the item, as identified in Request No. 1 (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."

The requested information is provided on the Att_1_GM disk in the folder labeled Q_02 refer to the Microsoft Access 2000 file labeled, "Q_02_REQUEST NUMBER TWO DATA."

- 3. 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 1-1 are on the Att_1_GM disk embedded in the folder labeled Q_02; refer to the Microsoft Access 2000 file labeled, "Q_02_REQUEST NUMBER TWO DATA." GM has organized the records by the GM file number within each attachment.

- 4. State, by model and model year, a total count for all of the following categories of claims, collectively, that have been paid by GM to date that relate to, or may relate to, the alleged defect in the subject vehicles: warranty claims; 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 (where there is an Isuzu or Saab file number, so state);**
- 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 2000, or a compatible format, entitled "WARRANTY DATA."

Tables 4-1 thru 4-4 summarize the regular and extended warranty claims for the subject vehicles that are responsive to this information request. GM identified 184 regular and extended warranty claims that may be related to the alleged condition as shown in Tables 4-1 and 4-3. GM determined that 80 of the 184 warranty claims may be related to perforation of the MRA feed and return pipes caused by corrosion as shown in Tables 4-2 and 4-4. A summary of the warranty claims, including the information requested in 4(a-k), is provided on the Att_1_GM disk in the folder labeled Q_04; refer to the Microsoft Access 2000 file labeled, "Q_04_WARRANTY DATA."

MAKE	MODEL	2002	2003	2004	TOTAL
Chevrolet	2WD TrailBlazer	4	1	1	6
Chevrolet	2WD TrailBlazer EXT	1	4	1	6
Chevrolet	4WD TrailBlazer	10	8	13	31
Chevrolet	4WD TrailBlazer EXT	2	5	5	12
GMC	2WD Envoy	2	2	0	4
GMC	2WD Envoy XL	0	1	0	1
GMC	4WD Envoy	7	0	3	10
GMC	4WD Envoy XL	0	3	3	6
GMC	XUV	N/A	N/A	6	6
Buick	Rainier	N/A	N/A	0	0
Oldsmobile	Bravada	2	0	0	2
Isuzu	Ascender	N/A	1	0	1
Total		28	25	32	85

TABLE 4-1 REGULAR WARRANTY CLAIMS FOR ANY FUEL PUMP LEAKAGE

MAKE	MODEL	2002	2003	2004	TOTAL
Chevrolet	2WD TrailBlazer	0	0	0	0
Chevrolet	2WD TrailBlazer EXT	0	0	0	0
Chevrolet	4WD TrailBlazer	2	3	4	9
Chevrolet	4WD TrailBlazer EXT	2	4	3	9
GMC	2WD Envoy	0	0	0	0
GMC	2WD Envoy XL	0	0	0	0
GMC	4WD Envoy	1	2	2	5
GMC	4WD Envoy XL	0	1	2	3
GMC	XUV	N/A	N/A	2	2
Buick	Rainier	N/A	N/A	0	0
Oldsmobile	Bravada	0	0	0	0
Isuzu	Ascender	N/A	1	0	1
Total		5	11	13	29

TABLE 4-2 REGULAR WARRANTY CLAIMS FOR FUEL PUMP LEAKS DUE TO PERFORATION CAUSED BY CORROSION

MAKE	MODEL	2002	2003	2004	TOTAL
Chevrolet	2WD TrailBlazer	0	0	0	0
Chevrolet	2WD TrailBlazer EXT	0	2	0	2
Chevrolet	4WD TrailBlazer	27	19	0	46
Chevrolet	4WD TrailBlazer EXT	1	9	0	10
GMC	2WD Envoy	0	0	0	0
GMC	2WD Envoy XL	0	0	0	0
GMC	4WD Envoy	5	6	0	11
GMC	4WD Envoy XL	3	7	0	10
GMC	XUV	N/A	N/A	0	0
Buick	Rainier	N/A	N/A	0	0
Oldsmobile	Bravada	17	3	0	20
Isuzu	Ascender	N/A	0	0	0
Total		53	46	0	99

TABLE 4-3 EXTENDED WARRANTY CLAIMS FOR ANY FUEL PUMP LEAKAGE

MAKE	MODEL	2002	2003	2004	TOTAL
Chevrolet	2WD TrailBlazer	0	0	0	0
Chevrolet	2WD TrailBlazer EXT	0	1	0	1
Chevrolet	4WD TrailBlazer	15	10	0	25
Chevrolet	4WD TrailBlazer EXT	1	4	0	5
GMC	2WD Envoy	0	0	0	0
GMC	2WD Envoy XL	0	0	0	0
GMC	4WD Envoy	3	3	0	6
GMC	4WD Envoy XL	2	3	0	5
GMC	XUV	N/A	N/A	0	0
Buick	Rainier	N/A	N/A	0	0
Oldsmobile	Bravada	8	1	0	9
Isuzu	Ascender	N/A	0	0	0
Total		29	22	0	51

TABLE 4-4 EXTENDED WARRANTY CLAIMS FOR FUEL PUMP LEAKS DUE TO PERFORATION CAUSED BY CORROSION

The sources of the requested information and the last date the searches were conducted are shown in Table 4-5 below.

SOURCE SYSTEM	LAST DATE GATHERED
GM CARD - regular warranty	March 31, 2008
Motors Insurance Corporation (MIC) - extended warranty	March 31, 2008
Universal Warranty Corporation (UWC) - extended warranty	April 9, 2008

TABLE 4-5: 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 and labor costs incurred in performing warranty service for our customers. Consequently, some of these warranty claims are not related to the alleged defect.

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 4K (dealer/technician comment). The verbatim text is an optional field in the GM warranty system for the dealer to enter any additional comments that may be applicable to the warranty claim. The verbatim text field is not required to be completed for every warranty claim.

The GM Warranty databases do not contain vehicle owner names and telephone numbers. The UWC extended warranty system does not use the GM labor code or labor code description and it does not contain the repairing dealer code, trouble code or trouble code description.

5. Describe in detail the search criteria used by GM to identify the claims identified in response to Request No. 5, including the labor operations, problem codes, part numbers and any other pertinent parameters used. Provide a list of all labor operations, labor operation descriptions, problem codes, and problem code

descriptions applicable to the alleged defect in the subject vehicles. State, by make and model year, the terms of the new vehicle warranty coverage offered by GM on the subject vehicles (i.e., the number of months and mileage for which coverage is provided and the vehicle systems that are covered). Describe any extended warranty coverage option(s) that GM offered for the subject vehicles and state by option, model, and model year, the number of vehicles that are covered under each such extended warranty.

The GM regular warranty and MIC claims that may relate to the subject condition were collected by searching for the labor codes listed in Table 5-1 below.

LABOR CODE	DESCRIPTION:
L1200	SENDER/PUMP, FUEL TANK UNIT-REPLACE
L1225	SENDER/PUMP-LFT TNK UNIT-REPLACE
L1228	SENDER/PUMP-RR TNK UNIT-REPLACE
Z1241	PRODUCT LIABILITY/INVESTIGATION REP PR (GOODWILL)
Z1242	PAR - REPAIRS/REIMBURSEMENT (GOODWILL)

TABLE 5-1 LABOR CODES USED IN WARRANTY SEARCH

The labor codes Z1241 and Z1242 can be used by dealers for reimbursement for goodwill warranty repairs. They are not specific to replacement of the subject components. Labor codes L1200, L1225 and L1228 are used by dealers for reimbursement for warranty repairs related to replacement of the subject component.

GM reviewed the regular warranty claims that included the labor and customer codes listed in Tables 5-1 and 5-2.

CUSTOMER CODE	DESCRIPTION:
VN	VISUAL: LEAK/LEAKS(MISSING)
OP	OPERATION: ODOR

TABLE 5-2 CUSTOMER CODES USED IN WARRANTY SEARCH

The MIC and UWC extended warranty data was collected using a search of the labor codes listed in Table 5-1. GM reviewed the MIC warranty and included claims that included the customer codes listed in Table 5-2. The UWC extended warranty claims do not contain trouble codes. GM reviewed the UWC claims and included claims that stated the fuel pump module leaked fuel.

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

The subject vehicles are covered by a bumper-to-bumper new vehicle warranty for three years or 36,000 miles whichever occurs first. Many different extended warranty options are available through GM dealerships. They are offered at different prices and for varying lengths of time, based on customer's preference, up to 7 years from the date of purchase or up to a total of 100,000 vehicle miles. The General Motor's warranty system does not contain information on the number of vehicles that have extended warranty coverage. The current number of extended warranty coverage contracts on the subject vehicles that have been sold

by MIC regardless of status (in-force, expired, cancelled) as of April 2, 2008 is contained in Table 5-3.

The production volumes for the additional vehicles called out in this information request are provided in Table 5-4.

MAKE	MODEL	2002	2003	2004	TOTAL
Chevrolet	TrailBlazer	104,328	66,946	61,177	232,451
Chevrolet	TrailBlazer EXT	10,161	32,595	21,636	64,392
GMC	Envoy	53,565	29,362	24,652	107,579
GMC	Envoy XL	5,457	21,557	12,222	39,236
GMC	Envoy XUV	N/A	N/A	8,438	8,438
Buick	Rainier	N/A	N/A	8,468	8,468
Oldsmobile	Bravada	40,081	4,560	1,384	46,025
Isuzu	Ascender	N/A	107	136	243
Total		213,592	155,127	138,113	506,832

TABLE 5-3: MIC EXTENDED WARRANTY COVERAGE CONTRACTS SOLD

MAKE	MODEL	2002	2003	2004
Chevrolet	TrailBlazer	*	*	209,225
Chevrolet	TrailBlazer EXT	*	*	69,242
GMC	Envoy	*	*	82,849
GMC	Envoy XL	*	*	38,926
GMC	XUV	N/A	N/A	24,102
Buick	Rainier	N/A	N/A	28,969
Oldsmobile	Bravada	28,711	8,642	3,475
Isuzu	Ascender	N/A	3,477	4,117

TABLE 5-4: VEHICLE PRODUCTION

* INFORMATION PREVIOUSLY PROVIDED IN PE07-013

The production information is provided on the Att_1_GM disk in the folder labeled Q_05 refer to the Microsoft Access 2000 file labeled, "Q_05

6. State the number of each of the following that GM has sold that may be used in the subject vehicles by component name, 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):
 - a. Subject component; and
 - 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 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.

An electronic summary table of the requested service part information for the subject components sold by GM through March 28, 2008 is included in Att_1_GM disk in the folder labeled Q_06, refer to the file labeled, "Q_06_GM_N070076B.xls"

These sales numbers represent the total MRA part sales to dealers in the US and Canada for the subject vehicles. 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.

This table contains service part numbers, part description, part usage information including other GM vehicles that contain the identical component, part sales figures by month and calendar year and the supplier's name and address, contact name and phone number.

* * *

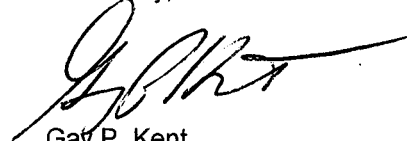
This response is based on searches of General Motors Corporation (GM) locations where documents determined to be responsive to your request would ordinarily be found. As a result, the scope of this search did not include, nor could it reasonably include, " all of their divisions, subsidiaries (whether 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), as well as Isuzu Motors Limited; Isuzu Motors America, Inc; Saab Automobile USA; and Saab Automobile Sverige who are or, in or after 1998, 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

N070076B
EA07-009

ATTACHMENT "1"

GM NON-CONFIDENTIAL MATERIAL