



GENERAL MOTORS CORPORATION

Vehicle Structure & Safety Integration

May 19, 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

N070146A

NVS-212pco  
EA07-013

Dear Ms. DeMeter:

This letter is General Motors (GM) response to your information request (IR), dated April 7, 2008, regarding alleged failure, tearing, bending or loosening of the hitch receiver for Model Year 1999 through 2007 GMT800 1500 and 2500 series Cadillac Escalade / Escalade EXT / Escalade ESV, Chevrolet Silverado / Tahoe / Avalanche / Suburban and GMC Sierra / Yukon / Yukon XL subject vehicles.

The field report and warranty claim information included is an incremental update to information previously included in response to PE07-025 provided on June 27, 2007.

Your questions and our corresponding replies are as follows:

1. State in a table format, within the body of the response letter and in an electronic spreadsheet, by model, model year, the total number of subject vehicles GM has manufactured for sale or lease in the United States (since June 13, 2007). Separately, for each vehicle manufactured to date by GM, state the following:
  - a. Model Year;
  - b. Make;
  - c. Model Code and Model Description;
  - d. Model;
  - e. Vehicle identification number (VIN);
  - f. Date of manufacture (in "yyyy/mm/dd" date format);
  - g. Date warranty coverage commenced (in "yyyy/mm/dd" date format) or "Unsold" if not sold;
  - h. The State in the United States where the vehicle was originally sold or leased (or delivered for sale or lease).
  - i. Rear Axle Ratio Regular Production Codes (RPO) and Description
  - j. Gross Vehicle Weight Rating (GVWR) Code and Description; and
  - k. Engine RPO Code and Description.

In addition, provide in a separate database file the VIN and complete RPO.

Provide the production summary table in Microsoft Excel 2000 and the production data files in Microsoft Access 2000, or a compatible format, entitled "PRODUCTION DATA" and VINs with RPOs."

Since its response on June 27, 2007 to PE07-025, GM has not manufactured any additional subject vehicles for sale or lease in the United States. The total number of subject vehicles manufactured for sale or lease in the U.S. is 7,136,603. Please see the production information provided in GM's June 27, 2007 response for response to 1a - 1k.

GM is providing updated vehicle sales information since June 1, 2007, in ATT\_1\_GM Disc, folder labeled: "Q\_01;" refer to Microsoft Access file named "Production Data."

**Product Investigations**

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EA07-013\_N070146A Response.doc

2. State within the body of the response letter and in an electronic spreadsheet, tables showing the number (since June 13, 2007) 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/fire, 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. Property damage claims (including own vehicle); and
- e. Third-party arbitration proceedings where GM is or was a party to the arbitration; and
- f. Lawsuits, both pending and closed, in which GM is or was a defendant or codefendant.

For subparts "a" through "d," 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). Identify reports that have a duplicate with either other mfg reports/claims or with ODI.

In addition, for subparts "d" through "f," 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.

Provide the tables in Microsoft Excel 2000, or a compatible format, entitled "MANUFACTURER REPORT COUNT" with each table separately tabbed.

Table 2-1 below summarizes the records for the subject vehicles that could relate to the subject condition of bending or loosening since the last response.

TYPE OF REPORT	GM REPORTS	SUBCATEGORIES			
		CORRESPONDING TO NHTSA REPORTS	NUMBER WITH PROPERTY DAMAGE	NUMBER WITH CRASH	NUMBER WITH INJURIES/FATALITIES
Owner Reports	4	0	0	0	0
Field Reports	13	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)	17	0	0	0	0
Total Vehicles with Reports (Unique VIN)	17*	0	0	0	0

TABLE 2-1: SUBJECT VEHICLE REPORT CLASSIFICATION – BENDING OR LOOSENING CONDITION

\* TWO OF THESE REPORTS WERE PROVIDED IN RESPONSE TO PE07-025 AND GM IS PROVIDING ADDITIONAL INFORMATION WITH THIS RESPONSE.

Table 2-2 below summarizes the records for the subject vehicles that could relate to the subject condition of failure or tearing since the last response.

TYPE OF REPORT	GM REPORTS	SUBCATEGORIES			
		CORRESPONDING TO NHTSA REPORTS	NUMBER WITH PROPERTY DAMAGE	NUMBER WITH CRASH	NUMBER WITH INJURIES/FATALITIES
Owner Reports	6	1	1	1	0
Field Reports	2	0	0	0	0
Not-In-Suit Claims	2	2	2	1	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)	10	3	3	2	0
Total Vehicles with Reports (Unique VIN)	9*	2	2	1	0

TABLE 2-2: SUBJECT VEHICLE REPORT CLASSIFICATION – FAILURE OR TEARING CONDITION

\* TWO OF THESE REPORTS WERE PROVIDED IN RESPONSE TO PE07-025 AND GM IS PROVIDING ADDITIONAL INFORMATION WITH THIS RESPONSE.

The data sources searched are shown in Table 2-3.

SOURCE SYSTEM	LAST DATE GATHERED
Customer Assistance Center	4/17/2008
Technical Assistance Center	4/17/2008
Early Quality Feedback (EQF)	4/10/2008
Field Information Network Database (FIND)	4/11/2008
Field Product Report Database (FPRD)	4/16/2008
Company Vehicle Evaluation Program (CVEP)	4/10/2008
Captured Test Fleet (CTF)	4/10/2008
Legal / Employee Self Insured Services (ESIS)	4/21/2008

TABLE 2-3: 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 for the subject vehicle and each non-subject vehicle MY by GVWR groups:
  - 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 (in "yyyy/mm/dd" date format);
- h. Report or claim date (in "yyyy/mm/dd" date format);
- i. Whether a crash is alleged;
- j. Whether property damage is alleged;
- k. Number of alleged injuries, if any;
- l. Number of alleged fatalities, if any.

**Provide a separate complaint table for the subject vehicle. Provide this information in Microsoft Access 2000, or a compatible format, entitled "REQUEST NUMBER TWO DATA."**

GM is providing the requested information since the last response, where available, for 3a-l in ATT\_1\_GM Disc, folder labeled: "Q\_03;" 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 for the subject vehicles only.**

Copies of the records summarized in Tables 2-1 and 2-2 are embedded in the file provided in ATT\_1\_GM Disc; folder labeled: "Q\_03;" refer to the Microsoft Access file named "Request Number Two Data." GM has organized the records by the GM file number within each attachment.

- 5. **State within the body of the response letter and in an electronic spreadsheet, by model and model year a total count for all of the following categories of claims (since June 3, 2007), collectively, that have been paid by GM to date that relate to, or may relate to, the alleged defect in the subject vehicle and each non-subject vehicles: warranty claims; extended warranty claims; claims for good will services that were provided; field, zone, or similar adjustments and reimbursements; and warranty claims or repairs made in accordance with a procedure specified in a technical service bulletin or customer satisfaction campaign.**

**Separately, for each such claim, state the following information:**

- a. GM's claim number;
- b. Vehicle owner or fleet name (and fleet contact person) and telephone number;
- c. VIN;
- d. Repair date (in "dd/mm/yyyy" date format);
- 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 the summary warranty data table in Microsoft Excel 2000, or a compatible format, entitled "WARRANTY DATA SUMMARY." Provide the warranty data file in Microsoft Access 2000, or a compatible format, entitled "WARRANTY DATA."**

For the subject vehicles, the regular warranty claims and extended warranty claims are summarized by make, model and model year in Tables 5-1 and 5-2. There were five claims for the good will services for the subject vehicles and are summarized by make, model and model year in Table 5-3. A summary of these warranty claims is provided in ATT\_1\_GM Disc; folder labeled: "Q\_05;" refer to the Microsoft Access file.

MAKE	MODEL	1999 MY	2000 MY	2001 MY	2002 MY	2003 MY
Cadillac	Escalade / Escalade ESV / Escalade EXT	N/A	N/A	N/A	0	0
Chevrolet	Silverado / Tahoe / Suburban / Avalanche	1	0	0	2	1
GMC	Sierra / Yukon / Yukon XL	0	0	0	0	0
	Total	1	0	0	2	1

TABLE 5-1 SUBJECT VEHICLE REGULAR WARRANTY SUMMARY  
 1999 – 2003 MY  
 N/A – Not Applicable

MODEL	MODEL	2004 MY	2005 MY	2006 MY	2007 MY	1999-2007 MY TOTAL
Cadillac	Escalade / Escalade ESV / Escalade EXT	0	0	0	0	0
Chevrolet	Silverado / Tahoe / Suburban / Avalanche	1	6	7	9	27
GMC	Sierra / Yukon / Yukon XL	0	3	5	6	14
	Total	1	9	12	15	41

TABLE 5-1 (CONTINUED) SUBJECT VEHICLE REGULAR WARRANTY SUMMARY  
 2004 – 2007MY

MODEL	MODEL	1999 MY	2000 MY	2001 MY	2002 MY	2003 MY
Cadillac	Escalade / Escalade ESV / Escalade EXT	N/A	N/A	N/A	0	0
Chevrolet	Silverado / Tahoe / Suburban / Avalanche	0	0	1	0	1
GMC	Sierra / Yukon / Yukon XL	0	0	0	0	0
	Total	0	0	1	0	1

TABLE 5-2 SUBJECT VEHICLE MIC EXTENDED WARRANTY SUMMARY

1999 – 2003 MY

N/A – Not Applicable

MODEL	MODEL	2004 MY	2005 MY	2006 MY	2007 MY	1999-2007 MY TOTAL
Cadillac	Escalade / Escalade ESV / Escalade EXT	0	0	0	0	0
Chevrolet	Silverado / Tahoe / Suburban / Avalanche	0	1	2	0	5
GMC	Sierra / Yukon / Yukon XL	0	1	0	0	1
	Total	0	2	2	0	6

TABLE 5-2 (CONTINUED) SUBJECT VEHICLE MIC EXTENDED WARRANTY SUMMARY

2004 – 2007MY

There were no claims in the UWC extended warranty database.

MODEL	MODEL	1999 MY	2000 MY	2001 MY	2002 MY	2003 MY
Cadillac	Escalade / Escalade ESV / Escalade EXT	N/A	N/A	N/A	0	0
Chevrolet	Silverado / Tahoe / Suburban / Avalanche	0	0	0	1	1
GMC	Sierra / Yukon / Yukon XL	0	0	1	0	0
	Total	0	0	1	1	1

TABLE 5-3 SUBJECT VEHICLE GOODWILL CLAIMS SUMMARY  
 1999 – 2003 MY  
 N/A – Not Applicable

MODEL	MODEL	2004 MY	2005 MY	2006 MY	2007 MY	1999-2007 MY TOTAL
Cadillac	Escalade / Escalade ESV / Escalade EXT	0	0	0	0	0
Chevrolet	Silverado / Tahoe / Suburban / Avalanche	0	1	0	0	0
GMC	Sierra / Yukon / Yukon XL	0	0	0	1	0
	Total	0	1	0	1	5

TABLE 5-3 (CONTINUED) SUBJECT VEHICLE GOODWILL CLAIMS SUMMARY  
 2004 – 2007MY

The summary of number of extended warranty policy sold is shown in Tables 5-4.

	Subject Vehicles
MIC	2,241,754
UWC	90,852

TABLE 5-4 NUMBER OF EXTENDED WARRANTY POLICIES SOLD

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 to collect the warranty data for this response.

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

SOURCE SYSTEM	LAST DATE GATHERED
GM Regular Warranty	5/1/2008
Motors Insurance Corporation (MIC) - extended warranty	4/21/2008
Universal Warranty Corporation (UWC) - extended warranty	4/24/2008

TABLE 5-5: DATA SOURCES

GM's warranty database does not contain the vehicle owner's name or telephone number. Some of the replacement part numbers, part descriptions and customer concern code descriptions are not included in the GM warranty database. GM is providing a field labeled "Verbatim Text." 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 MIC extended warranty system does not contain the vehicle owner information. 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.

The General Motors' warranty system does not contain information on the number of vehicles that have extended warranty coverage. The number of extended warranty coverage contracts on the subject vehicles that have been sold by MIC and UWC for the subject vehicles regardless of status (in-force, expired, cancelled).

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 alleged defect in the subject vehicles. State, by make and model year, the terms of the new vehicle warranty coverage (including the subject component) 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 regular warranty data was collected from the GM CARD database by searching for the labor operation codes listed in Table 6-1, trouble codes listed in Table 6-2, and customer complaint codes listed in Table 6-3. GM excluded claims that clearly did not relate to the



subject condition based on a review of dealer verbatim, replacement part number, replacement part description, and replacement part cost claims.

The regular warranty data with the z-labor operation codes in Table 6-4 can be used by dealers for reimbursement for goodwill warranty repairs. They are not specific to replacement of the trailer hitch assembly. GM reviewed the goodwill claims collected using these labor codes. GM excluded claims that clearly did not relate to the subject condition based on a review of dealer verbatim.

LABOR CODE	DESCRIPTION
B1160	Hitch, Trailer - R&R or Replace
I1007	Rear Trailer Hitch Ball, Replace
I1008	Trailer Hitch Ball Mount (Receiver)

TABLE 6-1: LABOR CODES USED IN CARD & MIC SEARCH

TROUBLE CODE	TROUBLE CODE DESCRIPTION
1A	Bent
1D	Broken
1J	Collapsed
1K	Cracked
2H	Improperly Installed
2T	Incorrect Torque
2W	Loose
3A	Misadjusted/ Misaligned
3F	Not Connected
4D	Sheared
4G	Stripped
4H	Torn
4Q	Weak
4R	Weld Broken
4S	Weld Omitted

TABLE 6-2: REGULAR WARRANTY TROUBLE CODES

CUSTOMER CODE	CUSTOMER COMPLAINT CODE DESCRIPTION
O2	Operation: Sway/Pitch (No maintenance adjustment)
O5	Operation: Wanders
O6	Operation: Wobble
OC	Operation: Bottom Out
ON	Operation: Loose
V4	Visual: Split Seam (Torn/Puncture)
V9	Visual: Torn/Punctured (wrinkled)
VB	Visual: Broken
VE	Visual: Cracked

TABLE 6-3: REGULAR WARRANTY CUSTOMER COMPLAINT CODES

LABOR CODE	DESCRIPTION
Z1241	Product Liability/Investigation Rep Pr
Z1242	PAR-Repairs/Reimbursement
Z1243	INSPECTION-PRODUCT ALLEGATION RESOLUTION

TABLE 6-4: LABOR CODES USED FOR GOODWILL CLAIMS

The MIC extended warranty data was also collected by searching for the labor, trouble and customer complaint codes listed in Tables 6-1, 6-2 and 6-3. GM excluded claims that clearly did not relate to the subject condition based on a review of replacement part cost claims. The Universal Warranty Corporation (UWC) does not use labor codes or trouble codes.

The subject Chevrolet and GMC vehicles are covered by a bumper-to-bumper new vehicle warranty for three years or 36,000 miles, whichever occurs first. The subject Cadillac vehicles are covered 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 customers' preference, up to 7 years from the date of purchase or up to a total of 100,000 vehicle miles. The General Motors warranty system does not contain information on the number of vehicles that have extended warranty coverage.

7. **Produce copies of all service, warranty, and other documents that relate to, or may relate to, the alleged defect in the subject vehicles (all issued revisions), that GM has issued to any dealers, regional or zone offices, field offices, fleet purchasers, or other entities. This includes, but is not limited to, bulletins, advisories, informational documents, training documents, or other documents or communications, with the exception of standard shop manuals. Also include the latest draft copy of any communication that GM is planning to issue within the next 120 days.**

GM has not issued any service, warranty or other documents to dealers, regional or zone offices, that relates to or may relate to the subject condition in the subject vehicles.

General Motors is not planning to issue in the next 120 days, any service, warranty or other technical documents or communications to its dealers, regional offices, zone offices or other entities regarding the subject condition in the subject vehicles.

The preceding information was collected from GM Service Operations. The data collection was completed on April 10, 2008.

8. **In the GM subject vehicle owner's manual under "Towing a Trailer<sup>1</sup>," GM recommends using an aftermarket sway control device when towing a trailer. Describe and provide any technical or test data on the following:**
  - a. **Any recommended aftermarket sway control device known to be compatible with the subject vehicle;**
  - b. **Comparison of hitch loading with and without the use of such a device when towing to its maximum trailer limits;**
  - c. **Any attempts to quantify the hitch loads when using an aftermarket sway control device; and**
  - d. **Any other documents or data that GM is aware concerning the hitch loads when using an aftermarket sway control device with the subject vehicle.**

Sway control is addressed in the GM owner's manual as follows:

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<sup>1</sup>2002 Chevrolet Tahoe/Suburban Owner's Manual, Section 4-56, "If You Do Decide To Pull A Trailer"

"Consider using a sway control if your trailer will weigh less than 5,000 lbs (2,270 kg). You should always use a sway control if your trailer will weigh more than 5,000 lbs (2,270 kg). You can ask a hitch dealer about sway controls."

GM also addresses sway control in the Trailing Guide in the "Controlling Trailer Sway" section:

"Sway refers to instability of the trailer relative to the trailer vehicle, and often results from improper weight distribution, excessive speed or overloading. Other factors can cause sway; crosswinds, poor vehicle maintenance and road conditions. Trying to steer out of a sway will likely make it worse. Speed is a major contributor to trailer sway, so you need to slow the vehicle – braking, however, could lead to a jackknife or other loss of control.

To control sway:

- Hold the steering wheel as steady as possible.
- Release the accelerator but do not touch the brake pedal.
- Activate electric trailer brakes (if equipped) by hand, until the sway condition stops
- Use the vehicle brakes to come to a complete stop.

You should then pull your vehicle to the side of the road and attempt to determine the cause of the instability. Check the cargo load for shifting and improper weight distribution. Check tire pressure on the tow vehicle and trailer, and the condition of the suspension and shocks. If the sway was caused by strong winds, wait for conditions to improve before continuing your trip. Finally, some trailers can be equipped with anti-sway devices. Contact the manufacturer of your trailer for availability."

Copies of the Trailing Guide for the subject model years (1999–2007) are provided in ATT\_1\_GM Disc; folder labeled: "Q\_08;" refer to the Adobe files.

There are many aftermarket manufacturers that build and sell a variety of anti-sway devices. GM does not compare anti-sway devices among different manufacturers for compatibility with our vehicles or measure the effectiveness of the anti-sway devices in various environmental and trailing conditions. However, GM vehicle validation testing while towing a trailer utilizes such devices consistent with information found in the owner's manual and illustrates the value of these devices.

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

- a. **The causal or contributory factor(s);**
- b. **The failure mechanism(s);**
- c. **The failure mode(s) including hitch assembly detachment from the mounting bolts and pin box separation (assuming both the safety chain and emergency brake lock safety link were attached to the holes in the pin box section);**
- 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.**

GM's assessment of the subject condition has not changed since responding to PE07-025 and is based on: updated reports and claims, testing and analysis of the design, evaluation of the manufacturing processes, and the field performance of the hitch assembly.

Based on the available information, GM believes that if the trailer hitch assembly is used within the trailer weight ratings, including tongue weight, published in the Owner's Manual and the guidelines set forth in the Trailing Guide, the subject component will perform without failure. There is no defect trend.

\* \* \*

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 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 September 1, 1997, 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

**N070146A  
EA07-013**

**ATTACHMENT "1"**

**GM NON-CONFIDENTIAL MATERIAL**