



October 24, 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

N070236B

NVS-212jfa
EA07-019

Dear Ms. DeMeter:

This letter is General Motors (GM) response to your information request (IR), dated October 9, 2008, regarding allegations of the power sliding door opening while the vehicle is in motion including when the vehicle is in motion or in gear but not in motion on model year (MY) 2005 through 2007 General Motors minivans.

Previously, Mr. Mike Lee of your staff clarified that the alleged defect for this inquiry is unintended or unexpected opening of the power sliding door (PSD) when the vehicle is out of PARK and "electronic controls" means the power sliding door module (PSDM).

In response to your request, GM is providing any additional reports, warranty claims and information that were not provided in previous responses for the 2005–2007 (MY) Chevrolet Venture/Uplander, Pontiac Montana/Montana SV6, Buick Terraza, and Saturn Relay – equipped with one or more power sliding doors.

The PSD system contains multiple safeguards to prevent the door from unlatching when the vehicle is in motion. In addition, there are multiple warnings and indicators designed into the PSD system to notify the driver that the door is not closed and latched when the driver shifts from PARK (P) to a drive gear.

GM has conducted extensive testing and validation of the PSD, analyzed and tested 58 returned parts, inspected numerous vehicles, conducted customer surveys and analyzed field reports and warranty claims. Many of the reported incidents of unintended or unexpected opening of the PSD when the vehicle is out of PARK are the consequence of driving away before the door is closed and latched, disregarding the audible warning chime, DIC door ajar message and illumination of the overhead courtesy lamp.

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

- The PSD system has successfully completed extensive validation testing without incident, including verification of: (1) the safeguards to prevent inadvertent unlatching of the door, and (2) the functions of warnings/indicators that the door is not latched.
- There are multiple warnings/indicators that the PSD is not closed and latched.
- GM has tested 58 unlatch actuators returned by dealers. All 58 functioned correctly and moved freely without irregularities.
- During this investigation GM did a through investigation of 5 vehicles, that had been identified as having the alleged defect. None of these 5 vehicles inspected exhibited unintended or unexpected opening of the closed PSD when the vehicle was out of PARK.
- GM contacted 5 VOQ customers and 100% of them provided additional information indicating either the PSD did not open when the vehicle was out of PARK or they took the vehicle out of PARK before the door was completely closed.

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- For over 12 years GM has assisted over 120 dealers with PSD service and has not identified a single vehicle in which the door unexpectedly or unintentionally opened when the vehicle was out of PARK, if the door was closed and latched when the vehicle was shifted from PARK (P).
- There is no defect trend related to the unlatch actuator and the unlatch actuator assembly.

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 since GM's March 18, 2008, EA response:
 - 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. Property damage claims;
 - 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 "f," 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 "f," 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 "e" and "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.

Table 1-1 below summarizes records that may relate to the alleged defect received by GM since February 13, 2008. GM has organized the records by the GM file number within each attachment.

TYPE OF REPORT	GM REPORTS	CORRESPONDING TO NHTSA REPORTS	NUMBER WITH PROPERTY DAMAGE	NUMBER WITH CRASH	NUMBER WITH INJURIES/ FATALITY*
Owner Reports	35	1	0	0	0
Field Reports	31	1	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)	66	2	0	0	0
Total Vehicles with Reports (Unique VIN)	63	1	0	0	0

TABLE 1-1: REPORT BREAKDOWN

* GM HAS NO FATALITY REPORTS

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. 1. Some incident reports may not contain sufficient reliable information to accurately assess cause and to establish that the report is related to unintended or unexpected opening of the power sliding door (PSD) when the vehicle is out of PARK. GM is in the process of contacting customers to clarify the details and circumstances regarding these reports.

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	10/17/2008
Technical Assistance Center	10/20/2008
Field Information Network Database (FIND)	10/13/2008
Field Product Report Database (FPRD)	10/13/2008
Company Vehicle Evaluation Program (CVEP)	10/13/2008
Captured Test Fleet (CTF)	10/13/2008
Early Quality Feedback (EQF)	10/13/2008
Legal / Employee Self Insured Services (ESIS)/Product Liability Claims/ Lawsuits	10/14/2008

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:
- GM's file number or other identifier used;
 - The category of the item, as identified in Request No. 2 (i.e., consumer complaint, field report, etc.);
 - Vehicle owner or fleet name (and fleet contact person), address, and telephone number;
 - Vehicle's VIN;
 - Vehicle's make, model and model year;
 - Vehicle's mileage at time of incident;
 - Incident date;
 - Report or claim date;
 - Whether a crash is alleged;
 - Whether property damage is alleged;
 - Number of alleged injuries, if any; and
 - 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 ONE DATA." Some incident reports may not contain sufficient reliable information to accurately answer all parts of question 2.

- 3. Produce copies of all documents related to each item within the scope of Request No. 1. 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 ONE 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, since GM's March 18, 2008, EA response to date, that relate to, or may relate to, the alleged defect, or repairs involving any of the subject components (e.g., latches/striker, plungers/pads, seals, contacts, unlatch actuators, sensors, and electronic controls) 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;
- b. Vehicle owner or fleet name (and fleet contact person) and telephone number;
- c. Vehicle's 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 and 4-2 summarize by model year the additional regular, goodwill and extended warranty claims for the subject vehicles, received by GM since February 13, 2008, that were collected by searching the labor codes, customer complaint codes and trouble codes that may be related to the alleged defect.

Tables 4-3 and 4-4 summarize by model and model year the additional regular, goodwill and extended warranty claims for the subject vehicles, received by GM since February 13, 2008, that were collected by searching the labor code related to repairs involving any of the subject components.

A list of the labor codes, customer complaint codes and trouble codes is provided in response to item No. 6. A summary of the warranty claims, including the information requested in 5(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."

REGULAR WARRANTY CLAIMS FOR SLIDING DOOR RELEASE ACTUATOR REPLACEMENT

MAKE/MODEL	2005 MY	2006 MY	2007 MY	TOTAL
CHEVROLET VENTURE	2	N/A	N/A	2
CHEVROLET UPLANDER	31	49	60	140
PONTIAC MONTANA	2	N/A	N/A	2
PONTIAC MONTANA SV6	21	26	N/A	47
BUICK TERRAZA	24	18	21	63
SATURN RELAY	0	1	0	1
TOTAL	80	94	81	255

TABLE 4-1
 N/A – NOT APPLICABLE

EXTENDED WARRANTY CLAIMS FOR SLIDING DOOR RELEASE ACTUATOR REPLACEMENT

MAKE/MODEL	2005 MY	2006 MY	2007 MY	TOTAL
CHEVROLET VENTURE	1	N/A	N/A	1
CHEVROLET UPLANDER	9	3	0	12
PONTIAC MONTANA	5	N/A	N/A	5
PONTIAC MONTANA SV6	2	1	N/A	3
BUICK TERRAZA	6	1	0	7
SATURN RELAY	21	1	1	23
TOTAL	44	6	1	51

TABLE 4-2
 N/A – NOT APPLICABLE

REGULAR WARRANTY CLAIMS FOR REPAIRS TO THE SUBJECT COMPONENTS

MAKE/MODEL	2005 MY	2006 MY	2007 MY	TOTAL
CHEVROLET VENTURE	40	N/A	N/A	40
CHEVROLET UPLANDER	1075	1097	2720	4892
PONTIAC MONTANA	36	N/A	N/A	36
PONTIAC MONTANA SV6	566	714	N/A	1280
BUICK TERRAZA	822	651	1130	2603
SATURN RELAY	454	246	496	1196
TOTAL	2993	2708	4346	10047

TABLE 4-3
 N/A – NOT APPLICABLE

EXTENDED WARRANTY CLAIMS FOR REPAIRS TO THE SUBJECT COMPONENTS

MAKE/MODEL	2005 MY	2006 MY	2007 MY	TOTAL
CHEVROLET VENTURE	16	N/A	N/A	16
CHEVROLET UPLANDER	263	49	16	328
PONTIAC MONTANA	80	N/A	N/A	80
PONTIAC MONTANA SV6	14	35	N/A	49
BUICK TERRAZA	122	4	0	126
SATURN RELAY	154	16	5	175
TOTAL	649	104	21	774

TABLE 4-4
 N/A – NOT APPLICABLE

GM searched the GM North America Claim Analysis 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 warranty data was last gathered on October 13, 2008.

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.

- 5. Describe in detail the search criteria used by GM to identify the claims identified in response to Request No. 4, 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.**

To search for and collect the warranty data for this response that may relate to unintended or unexpected opening of the PSD when the vehicle is out of PARK, the GM Claim Adjustment Retrieval Database (CARD) regular warranty database and the MIC extended warranty database were searched using the labor codes listed in table 5-1. UWC does not use labor codes or trouble codes.

GM lists the customer complaint codes in Table 5-2 and the trouble codes in Table 5-3, within the labor codes listed in Table 5-1 that may relate to unintended or unexpected opening of the PSD when the vehicle is out of PARK.

GM also included all warranty claims in Table 4-1 that showed replacement of the actuator or actuator assembly part numbers, unless the verbatim indicated that the issue was unrelated to the door opening when the vehicle is out of PARK.

LABOR CODE	DESCRIPTION:
N3226	Actuator Assembly – Door Lock-Slide - RT
N4874	Actuator, Door Unlatch (Power Sliding)
N4875	Actuator, Lock (Power Sliding DR) - RPL
Z1241	Product Liability/Investigation REP PR (Goodwill)
Z1242	PAR – Repairs/Reimbursement (Goodwill)
Z1243	PAR – Inspections Requested

TABLE 5-1 LABOR CODES RELATED TO REPLACEMENT OF THE UNLATCH ACTUATOR

CUSTOMER COMPLAINT CODE	DESCRIPTION:
MJ	Misc: Customer Satisfaction
O7	Operation: No Maintain Adjustment
O8	Operation: Won't Turn Off
OA	Operation: Binds
OF	Operation: Engage/Disengage (Excessive Effort)
OG	Operation: Excessive Effort (Excessive Play)
OJ	Operation: Inoperative
OL	Operation: Intermittent
VB	Visual: Broken
VP	Visual: Misaligned (Orange Peel)

TABLE 5-2 CUSTOMER COMPLAINT CODES USED IN WARRANTY SEARCH

TROUBLE CODE	DESCRIPTION:
1D	Broken
1Y	Foreign material
2F	Clearance – Too Tight
2W	Loose
3A	Misadjusted
3L	Out of Calibration
5W	Rusted/Corroded
6C	Component - Inoperative
6D	Component - Intermittent
6F	Component - Open
6G	Component - Shorted
6J	Connector - Corroded
93	Technical Service Bulletin
98	Customer Satisfaction

TABLE 5-3 TROUBLE CODES USED IN WARRANTY SEARCH

To search for and collect the warranty data for this response for repairs involving any of the subject components, the GM Claims Adjustment Retrieval Database (CARD) regular warranty database and the Motors Insurance Corp (MIC) extended warranty database were searched using the labor codes listed in table 5-4.

The labor codes listed in Table 5-4 are the labor codes related to repairs of the subject components for any reason. Thus all customer complaint codes and trouble codes within the labor codes listed are included.

LABOR CODE	DESCRIPTION:
B5060	LOCK, SLIDING OR SWING OUT DOOR - RIGHT - R&R OR REPLACE
B5060	LOCK, SLIDING OR SWING OUT DOOR - LEFT - R&R OR REPLACE
B4979	STRIKER, FRONT/REAR/SWING-OUT OR SLIDING DOORS - ADJUST
B5050	STRIKER, SLIDING OR SWING OUT DOOR LOCK - DOOR LOCK - ADJUST
B5051	STRIKER, SLIDING OR SWING OUT DOOR LOCK - DOOR LOCK - LEFT
B5054	DR STRIKER ADJ/RPL
B5055	DR STRIKER ADJ/RPL
N3010	CONTACT, ELECTRICAL - SLIDING DOOR LOCK - REPLACE
C1170	WEATHERSTRIP SEAL ALIGN/RPL
C1180	WEATHERSTRIP - SLIDING DOOR - ALIGN OR REPLACE
C1635	GUARDS, REAR SIDE DOOR - RIGHT - REPLACE
C1636	GUARDS, REAR SIDE DOOR - LEFT - REPLACE
N2186	SWITCH - DOOR JAMB - SLIDING - REPLACE
N4842	POWER SLID DR MODUL
N4872	MODULE, CONTROL (POWER SLIDING DOOR) - REPLACE
B5006	CABLE,SLIDNG DR CATCH RELEASE- RPL
N9523	POWER SLIDING DOOR MODULE - REPROGRAM
N3316	SLIDING DOOR MOTOR PRL.
N4870	MOTOR, CLUTCH ASSEMBLY (POWER SLIDING DOOR) - REPLACE
N4881	SLIDING DOOR COMPONENT OPTICAL SENSOR - REPLACE

TABLE 5-4 LABOR CODES RELATED TO REPAIRS OF THE SUBJECT COMPONENTS

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 GM's 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 regardless of status (in-force, expired, cancelled) as of October 13, 2008 is contained in Table 5-5.

MAKE/MODEL	2005 MY	2006MY	2007 MY	TOTAL
CHEVROLET VENTURE	5391	N/A	N/A	5391
CHEVROLET UPLANDER	12584	10684	6277	29545
PONTIAC MONTANA	2668	N/A	N/A	2668
PONTIAC MONTANA SV6	5103	3331	N/A	8434
BUICK TERRAZA	5856	1710	803	8369
SATURN RELAY	11127	0	0	11127
TOTAL	42729	15725	7080	65534

TABLE 5-5: MIC EXTENDED WARRANTY COVERAGE CONTRACTS SOLD
 N/A - NOT APPLICABLE

6. 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.

On April 4, 2008 GM issued Preliminary Information Car #PIC4845: Part Restriction – Power Sliding Door Actuator Control Module Assembly – key words 07-08-64-007 accessory body power Part Quality Center (PQC) Power Sliding Door (PSD) restricted – (April 4, 2008). The bulletin informs dealers of a replacement part restriction for the power sliding door actuator control module assembly because recent part reviews indicate that 95% of the power sliding door modules returned for analysis did not test defective. In order to better understand what is causing these parts to be replaced, dealers need to complete the form included with the bulletin before contacting the Part Quality Center to order parts. A copy of #PIC4845 is provided on the Att_1_CD, GM disk in the folder labeled “Q_06,” refer to the file labeled, “Bulletin PIC4845.”

On July 21, 2008 GM issued service bulletin 07-08-64-007D: General Power Sliding Door Diagnosis/Repair Procedure – (July 21, 2008). Service bulletin #07-08-64-007D was issued to clarify diagnosis/repair procedures for the power sliding door. A copy of #07-08-64-007D is provided on the Att_1_CD, GM disk in the folder labeled “Q_06,” refer to the file labeled, “Bulletin 07-08-64-007D.”

GM 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 October 17, 2008.

* * *

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 2003, 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,

A handwritten signature in black ink, appearing to read 'G. Kent', written in a cursive style.

Gay P. Kent
Director

Product Investigations

Attachments