



*2007/03/07*

April 27, 2007

Thomas Z. Cooper, Chief  
Vehicle Integrity Division  
Office of Defects Investigation  
NHTSA Enforcement  
Room #5326  
400 Seventh Street, S.W.  
Washington, D.C. 20590

N070077 Partial

NVS-212am  
PE07-014

Dear Mr. Cooper:

This letter is General Motors' (GM) partial response to your information request (IR), dated March 16, 2007, regarding allegations of fuel tank leaks in 2002–2003 MY Chevrolet Trailblazer EXT and GMC Envoy XL vehicles. This response provides information regarding allegations of fuel leakage and/or odor originating from the area of the inlet check valve (ICV) filler pipe/fuel tank interface.

Your questions, 1 through 6, and our corresponding replies are as follows:

1. **State, by model and model year, the number of subject vehicles GM has manufactured for sale or lease in the United States. Separately, for each subject 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; and
  - g. The State in the United States where the vehicle was originally sold or leased (or delivered for sale or lease).

Provide the table in Microsoft Access 2000, or a compatible format, titled "PRODUCTION DATA."

General Motors is providing the number of subject vehicles produced for sale or lease in the United States by make, model and model year in Table 1 below:

MAKE/MODEL	2002 MY	2003 MY	TOTAL
Chevrolet Trailblazer EXT	23,905	87,028	110,933
GMC Envoy XL	12,852	56,002	68,854
TOTAL	36,757	143,030	179,787

TABLE 1 VEHICLE PRODUCTION

The production information requested in 1a-1g is provided on the Att\_1\_GM disk in the folder labeled Q\_01 refer to the Microsoft Access 2000 file labeled, "Q\_01\_PRODUCTION DATA". GM is providing the state where the vehicle was shipped in response to request 1g. 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 alleged defect in the subject vehicles:**

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- 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;
- 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.

Table 2-1 below summarizes records that could relate to the alleged defect. GM has organized the records by the GM file number within each attachment.

GM has determined that 56 percent of the reports indicate that the customers observed illumination of the instrument panel Service Engine Soon (SES) warning light.

TYPE OF REPORT	GM R. CORP.	SUBROGATION CLAIMS				
		CORRESPONDING TO NHTSA REQUESTS	NUMBER WITH PROPERTY DAMAGE	NUMBER WITH CRASH	NUMBER WITH INJURIES/ FATALITY	NUMBER WITH FIRE
Owner Reports	474	10	0	0	0	0
Field Reports	58	0	0	0	0	0
Not-In-Suit Claims	0	0	0	0	0	0
Subrogation Claims	0	0	0	0	0	0
3rd Party Arbitration Proceedings	0	0	0	0	0	0
Product Liability Lawsuits	0	0	0	0	0	0
Total Reports (Including Duplicates)	532	10	0	0	0	0
Total Vehicles with Reports (Unique VIN)	527	10	0	0	0	0

TABLE 2-1: REPORT BREAKDOWN

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. 2. Some incident reports may not contain sufficient reliable information to accurately assess cause.

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	03/23/07
Technical Assistance Center	03/30/07
Field Information Network Database (FIND)	03/29/07
Field Product Report Database (PRD)	03/29/07
Company Vehicle Evaluation Program (CVI P)	03/29/07
Captured Test Fleet (CTF)	03/21/07
Many Quality Feedback (MQF)	03/21/07
Legal: Employee Self Insured Services (ESIS) Product Liability Claims/ Lawsuits	03/22/07

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 VW;
  - 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;
  1. 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\_03 refer to the Microsoft Access 2000 file labeled, "Q\_03\_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.

Copies of the records summarized in Table 2-1 are on the Att\_1\_GM disk embedded in the folder labeled Q\_03; refer to the Microsoft Access 2000 file labeled, "Q\_03\_REQUEST NUMBER TWO DATA". GM has organized the records by the GM file number within each attachment.

5. 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;
- 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 "WARRPLNTY DATA."

Tables 5-1 and 5-2 summarize by model and model year the regular, goodwill and extended warranty claims for the subject vehicles that were collected by searching the labor codes and trouble codes that may be related to the subject condition.

GMs analysis of the regular warranty claims indicates in 83.7 percent of the claims the customer observed illumination of the Service Engine Soon (SES) warning light.

A list of the labor 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\_05; refer to the Microsoft Access 2000 file labeled, "Q\_05\_WARRANTY DATA."

REGULAR WARRANTY CLAIMS FOR FUEL TANK REPLACEMENT

MAKE/MODEL	2002MY	2003 MY	TOTAL
Chevrolet Trailblazer LT	5,380	6,235	11,615
GMC Envoy XE	2,827	4,283	7,110
TOTAL	8,207	10,518	18,725

TABLE 5-1

EXTENDED WARRANTY CLAIMS FOR FUEL TANK REPLACEMENT

MAKE/MODEL	2002MY	2003 MY	TOTAL
Chevrolet Trailblazer LT	194	664	858
GMC Envoy XL	98	464	562
TOTAL	292	1,128	1,420

TABLE 5-2

The sources of the requested information and the last date the searches were conducted are tabulated in Table 5-3 below.

SOURCE SYSTEM	LAST DATE GATHERED
GM CARD --regular warranty	03/21/07
Motors Insurance Corporation (MIC) -- extended warranty	03/28/07
Universal Warranty Corporation (UWC) -- extended warranty	03/23/07

TABLE 5-3: 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 5K (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 MIC extended warranty system does not contain the following information: repairing dealer code, vehicle owner information, trouble code, trouble code description, part number, part description or verbatim. 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.

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 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 the GM Claim 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 6-1. Universal Warranty Corporation (UWC) does not use labor codes or trouble codes.

LABOR CODE	DESCRIPTION:
L1260	TANK, FUEL - REPLACE
L1281	TANK, LEFT FUEL - REPLACE
Z1241	PRODUCT LIABILITY/INVESTIGATION REP PR (GOODWILL)
Z1242	PAR - REPAIRS/REIMBURSEMENT (GOODWILL)

TABLE 6-1 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 fuel tank. GM reviewed the goodwill claims collected using these labor codes. Based on a review of the dealer verbatim, customer code, trouble code and repair cost the claims that clearly did not relate to replacement of the fuel tank are not being provided.

Table 6-2 lists the trouble codes and Table 6-3 lists the customer complaint codes that may relate to the subject condition.

TROUBLE CODE	DESCRIPTION	TROUBLE CODE	DESCRIPTION
1B	CASTING DEFECT	3R	POROSITY
1D	BROKEN	3V	PUNCTURED
1H	CRACKED/RESIN CRACK/BLOCKED	3Z	RUBBERED
1J	COLLAPSED	4D	SQUARED
1K	CRACKED	4H	TORN
1L	CRACK	4N	WARPED/WAY/WINKLED
1N	BURRS	4O	WFAK
1V	CONTAMINATION/LEAKAGE	4R	WELD BROKEN
2L	CLEARANCE-EXCESSIVE	4S	WELD OPENED
2G	IMPROPERLY CUT	4X	WORN
2P	IMPROPERLY INSULATED	5V	RUSTY/CORRODED
2K	IMPROPERLY SEALED	6C	...
2I	INSULATION PRESSURE	6D	...
2P	INSULATION SEPARATION	6F	COMPONENT OPEN
2T	INCORRECT TORQUE	6J	CONNECTOR-CORRODED
2W	LOOSE	6P	CONNECTOR-SEAL DAMAGED
3F	NOT CONNECTED	98	CUSTOMER SATISFACTION
3N	POOR MACHINING	OB	OBD II USED

TABLE 6-2 TROUBLE CODES USED IN WARRANTY SEARCH

CUSTOMER COMPLAINT CODE	DESCRIPTION
MJ	MISC CUSTOMER SATISFACTION
OP	OPERATION: EXCESSIVE PLAY (FUEL/S)
OI	OPERATION: FUEL SHUT OFF
ON	OPERATION: LOOSE
OP	OPERATION: ODOR
VB	VISUAL: BROKEN
VI	VISUAL: CRACKED
VI	VISUAL: FLUTTER (LINKS)
VN	VISUAL: FAK/LEAKS (MISSING)
VP	VISUAL: MISALIGN (ORANGE PULL)
VV	VISUAL: PEELING/SCRATCHES/DEEP
V4	VISUAL: SHELL SCALD (TORN PUNCTURED)
V9	VISUAL: TORN PUNCTURED (WINKLED)
VG	WARNING LIGHTS: SERVICE ENGINE SOON

TABLE 6-3 CUSTOMER COMPLAINT CODES USED IN WARRANTY SEARCH

Based on a review of the dealer verbatim, replacement part number or replacement part cost claims that clearly did not relate to the subject condition are not being provided.

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.

\* \* \*

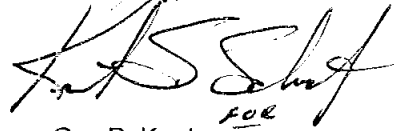
This response is based on searches of General Motors Corporation (GM) locations where documents determined to be responsive to your request would ordinarily be found. As a result, the scope of this search did not include, nor could it reasonably include, "all of its divisions, subsidiaries (whether or 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 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,

A handwritten signature in black ink, appearing to read "G. P. Kent". The signature is stylized and includes a small "for" written below it.

Gay P. Kent  
Director

Product Investigations

Attachments