



GENERAL MOTORS NORTH AMERICA
Structure & Safety Integration

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OFFICE OF DEFECTS INVESTIGATION

June 27, 2007

Thomas Z. Cooper, Chief
Vehicle Integrity Division
Office of Defects Investigation
National Highway Traffic Safety Administration
Room #5326
400 Seventh Street, S.W.
Washington, D.C. 20590

N070146 Partial

NVS-212.pco
PE07-025

Dear Mr. Cooper:

This letter is General Motors' (GM) partial response to your information request (IR), dated May 15, 2007, regarding alleged failure, tearing, bending or loosening of the hitch receiver for 2002 Model Year (MY) C/K 2500 series Suburban/Yukon and Silverado/Sierra/Avalanche subject vehicles.

GM is also providing information for the non-subject vehicles of MY 1999 through 2007 GMT800 1500 and 2500 series that are equipped with the same basic trailer hitch as installed in the subject vehicles, excluding MY 2002 GMT800 2500 series subject vehicles noted above.

Your questions, 1 through 7, and our corresponding replies are as follows:

1. State within the body of the response letter and in an electronic spreadsheet, by model, model year, the total number of subject vehicles and non-subject vehicles GM has manufactured for sale or lease in the United States. Separately, for each vehicle manufactured to date by GM, state the following:
 - a. Make;
 - b. Model;
 - c. Model Year;
 - d. Vehicle identification number (VIN);
 - e. Date of manufacture (in "yyyy/mm/dd" date format);
 - f. Date warranty coverage commenced (in "yyyy/mm/dd" date format) or "Unsold" if not sold; and
 - g. The State in the United States where the vehicle was originally sold or leased (or delivered for sale or lease).

In addition, provide within the body of the response letter, a table containing the subject and non-subject vehicles by model, model year, C/K, 1500/2500 series, GVWR, GAWRs, GCWR, and the corresponding hitch rating(s) including the trailer towing capacity and tongue weight (with and without the weight distribution hitch). Describe which of these vehicle towing attributes can be deciphered from within the vehicle's VIN code. Provide this spreadsheet table also in a file in Microsoft Excel, or a compatible format, entitled "VEHICLE TOW RATINGS."

Provide a separate population file for the subject vehicle and for each MY of the non-subject vehicles. Within each MY file, provide a separate population table for each GVWR group in Microsoft Access 2000, or a compatible format, entitled "NON-SJ MY XX PRODUCTION DATA." If there are multiple tow ratings for the same model year/GVWR vehicle, denote them.

Product Investigations

Mail Code: 480-210-G11 • 30001 Van Dyke • Warren, MI 48090
PE07-025_N070146 Partial Response.doc



The number of subject vehicles GM has manufactured for sale or lease in the United States is shown in Table 1-1. The number of non-subject vehicles GM has manufactured for sale or lease in the United States is shown in Table 1-2. An electronic summary of the production data is provided on the ATT_1_GM Disc; refer to the Microsoft Access 2000 files in the folders labeled "Q_01_a Production Data GVWR" and "Q_01_b Production Data GVWR."

Gross Vehicle Weight Rating (GVWR) is provided in the additional column of the production data attachment for both subject and non-subject vehicles.

Gross Combination Weight Rating (GCWR) along with Maximum Trailer Weight capacity can be identified for individual Vehicle Identification Number (VIN) based on model code and Regular Production Codes (RPO) of the engine, transmission type, and rear axle ratio that are provided in the additional columns of the production data attachment for both subject and non-subject vehicles. The look-up table for this identification is provided in the owner's manual in the section "Weight of the Trailer." The corresponding hitch rating(s) including the tongue weight (with and without the weight distribution hitch) is also described in the same section of the owner's manual.

Gross Axle Weight Rating (GAWR) can be identified for individual Vehicle Identification Number (VIN) based on model code and Regular Production Codes (RPO) that are provided in the separate production data attachment for both subject and non-subject vehicles on the ATT_1_GM Disc; refer to the Microsoft Access 2000 files in the folders labeled "Q_01_c VINs with RPOs" and "Q_01_d VINs with RPOs." The look-up tables for this identification are provided on the ATT_1_GM Disc; refer to the Microsoft Excel file named "GAWR Look Up Tables" in the folder labeled "Q_01."

This data was last collected from the GM Claims Analysis Retrieval Database (CARD) and Statistical Analysis System (SAS) on June 13, 2007.

MAKE/ MODEL	2002 MY
Chevrolet/ Silverado 2500	152,066
Chevrolet/ Suburban 2500	6,955
Chevrolet / Avalanche 2500	6,087
GMC / Sierra 2500	47,384
GMC / Yukon XL 2500	2,560
Total	215,052

TABLE 1-1 SUBJECT VEHICLE PRODUCTION SUMMARY

MODEL	MODEL	1999 MY	2000 MY	2001 MY	2002 MY	2003 MY
Cadillac	Escalade	N/A	N/A	N/A	54,066	28,669
Cadillac	Escalade ESV	N/A	N/A	N/A	N/A	8,515
Cadillac	Escalade EXT	N/A	N/A	N/A	12,513	8,837
Chevrolet	Silverado 1500	204,453	254,731	210,511	229,353	261,768
Chevrolet	Tahoe 1500	N/A	57,180	139,759	148,764	153,684
Chevrolet	Suburban 1500	N/A	68,033	120,966	111,062	109,093
Chevrolet	Avalanche 1500	N/A	N/A	N/A	122,350	68,912
Chevrolet	Silverado 2500	29,948	59,641	126,890	See Table 1-1	163,718
Chevrolet	Suburban 2500	N/A	7,179	16,139	See Table 1-1	7,423
Chevrolet	Avalanche 2500	N/A	N/A	N/A	See Table 1-1	1,982
GMC	Sierra 1500	65,208	81,352	67,335	77,088	77,476
GMC	Yukon 1500	N/A	21,698	60,870	58,229	69,134
GMC	Yukon XL 1500	N/A	25,274	64,550	65,687	66,054
GMC	Sierra 2500	9,508	18,716	40,671	See Table 1-1	50,329
GMC	Yukon XL 2500	N/A	2,459	5,514	See Table 1-1	2,868
	Total	309,117	596,263	853,205	879,052	1,078,462

TABLE 1-2 NON-SUBJECT VEHICLE PRODUCTION SUMMARY

1999 – 2003 MY

N/A – Not Applicable

MODEL	MODEL	2004 MY	2005 MY	2006 MY	2007 MY	1999-2007 MY TOTAL
Cadillac	Escalade	37,659	32,180	13,558	N/A	166,072
Cadillac	Escalade ESV	16,820	13,453	6,210	N/A	44,998
Cadillac	Escalade EXT	9,441	8,776	3,023	N/A	42,590
Chevrolet	Silverado 1500	310,276	298,158	258,437	81,613	2,109,300
Chevrolet	Tahoe 1500	152,274	111,823	48,864	N/A	812,348
Chevrolet	Suburban 1500	102,134	73,198	25,952	N/A	610,438
Chevrolet	Avalanche 1500	87,958	58,042	23,959	N/A	361,221
Chevrolet	Silverado 2500	192,665	162,435	145,682	79,996	960,975
Chevrolet	Suburban 2500	6,966	5,502	1,834	N/A	45,043
Chevrolet	Avalanche 2500	1,534	849	318	N/A	4,683
GMC	Sierra 1500	100,789	115,776	103,915	24,633	713,572
GMC	Yukon 1500	71,450	57,965	23,181	N/A	362,527
GMC	Yukon XL 1500	61,466	48,283	22,774	N/A	354,088
GMC	Sierra 2500	63,533	56,694	50,736	28,122	318,309
GMC	Yukon XL 2500	2,356	1,723	467	N/A	15,387
	Total	1,217,321	1,044,857	728,910	214,364	6,921,551

TABLE 1-2 (CONTINUED) NON-SUBJECT VEHICLE PRODUCTION SUMMARY 2004 – 2007MY

N/A – Not Applicable

2. State within the body of the response letter and in an electronic spreadsheet, tables showing 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 vehicle and each nonsubject vehicle MY by GVWR groups:
 - 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.

The individual vehicle Gross Vehicle Weight Ratings (GVWR) is provided in the response to question 1 for grouping.

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

TYPE OF REPORT	GM REPORTS	SUBPART COUNTS			
		CORRESPONDING TO NHTSA REPORTS	NUMBER WITH PROPERTY DAMAGE	NUMBER WITH CRASH	NUMBER WITH INJURIES/FATALITIES
Owner Reports	9	1	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)	9	1	0	0	0
Total Vehicles with Reports (Unique VIN)	9	1	0	0	0

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

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

TYPE OF REPORT	SUBJECT VEHICLES				
	GM REPORTS	CONNECTION TO NHTSA REPORTS	NUMBER WITH PROPERTY DAMAGE	NUMBER WITH CRASH	NUMBER WITH INJURIES/FATALITIES
Owner Reports	21	1	0	0	0
Field Reports	2	0	0	0	0
Not-In-Suit Claims	0	0	0	0	0
Subrogation Claims	1	0	1	1	0
Third Party Arbitration Proceedings	0	0	0	0	0
Product Liability Lawsuits	1	0	0	1	1/0
Total Reports (Including Duplicates)	25	1	1	2	1/0
Total Vehicles with Reports (Unique VIN)	24	1	1	2	1/0

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

Table 2-3 below summarizes the records for the non-subject vehicles that could relate to the subject condition of bending or loosening.

TYPE OF REPORT	NON-SUBJECT VEHICLES				
	GM REPORTS	CONNECTION TO NHTSA REPORTS	NUMBER WITH PROPERTY DAMAGE	NUMBER WITH CRASH	NUMBER WITH INJURIES/FATALITIES
Owner Reports	29	0	0	0	0
Field Reports	6	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)	35	0	0	0	0
Total Vehicles with Reports (Unique VIN)	34	0	0	0	0

TABLE 2-3: NON-SUBJECT VEHICLE REPORT CLASSIFICATION – BENDING OR LOOSENING CONDITION

Table 2-4 below summarizes the records for the Non-subject vehicles that could relate to the subject condition of failure or tearing.

TYPE OF REPORT	GM REPORTS	SUBJECT CONDITIONS			
		CORRESPONDING TO NHTSA REPORTS	NUMBER WITH PROPERTY DAMAGE	NUMBER WITH CRASH	NUMBER WITH INJURIES /FATALITIES
Owner Reports	52	1	2	9	1/0
Field Reports	5	0	0	0	0
Not-In-Suit Claims	5	1	4	5	3/1
Subrogation Claims	3	0	3	3	2/0
Third Party Arbitration Proceedings	0	0	0	0	0
Product Liability Inquiries	1	0	0	0	0
Total Reports (Including Duplicates)	66	2	9	17	6/1
Total Vehicles with Reports (Unique VIN)	63	2	9	14	5/1

TABLE 2-4: NON-SUBJECT VEHICLE REPORT CLASSIFICATION – FAILURE OR TEARING CONDITION

The data sources searched are shown in Table 2-5.

SOURCE SYSTEM	LAST DATE GATHERED
Customer Assistance Center	5/22/2007
Technical Assistance Center	6/4/2007
Early Quality Feedback (EQF)	5/25/2007
Field Information Network Database (FIND)	5/30/2007
Field Product Report Database (FPRD)	5/30/2007
Company Vehicle Evaluation Program (CVEP)	5/25/2007
Captured Test Fleet (CTF)	5/25/2007
Legal / Employee Self Insured Services (ESIS)	6/1/2007

TABLE 2-5: 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 and for each MY of the non-subject vehicle. Provide this information in Microsoft Access 2000, or a compatible format, entitled "REQUEST NUMBER TWO DATA."

GM is providing the requested information, where available, for 3a-I 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 through 2-4 are embedded in the file provided in ATT_1_GM Disc; folder labeled: "Q_03," refer to the Microsoft Access file. 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, model year and GVWR groups, 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 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 a separate warranty data table for the subject vehicle and for each MY of the nonsubject vehicle. Provide this information in Microsoft Access 2000, or a compatible format, entitled "WARRANTY DATA."

The individual Gross Vehicle Weight Ratings (GVWR) are provided in the response to question 1 for grouping.

For the subject vehicles, the regular warranty claims and extended warranty claims are summarized by model and model year in Tables 5-1 through 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	2002 MY
Chevrolet/ Silverado 2500	68
Chevrolet/ Suburban 2500	3
Chevrolet / Avalanche 2500	3
GMC / Sierra 2500	21
GMC / Yukon XL 2500	0
Total	96

TABLE 5-1 SUBJECT VEHICLE REGULAR WARRANTY SUMMARY

MAKE/ MODEL	2002 MY
Chevrolet/ Silverado 2500	5
Chevrolet/ Suburban 2500	0
Chevrolet / Avalanche 2500	2
GMC / Sierra 2500	1
GMC / Yukon XL 2500	0
Total	8

TABLE 5-2 SUBJECT VEHICLE MIC EXTENDED WARRANTY SUMMARY

MAKE/ MODEL	2002 MY
Chevrolet/ Silverado 2500	0
Chevrolet/ Suburban 2500	0
Chevrolet / Avalanche 2500	0
GMC / Sierra 2500	0
GMC / Yukon XL 2500	0
Total	0

TABLE 5-3 SUBJECT VEHICLE UWC EXTENDED WARRANTY SUMMARY

There were zero claims for the good will services for both subject and non-subject vehicles.

For the non-subject vehicles, the regular warranty claims and extended warranty claims are provided in ATT_1_GM Disc; folder labeled: "Q_05;" refer to the Microsoft Access file. The summary of number of extended warranty policy sold is shown in Table 5-4.

	Subject Vehicles	Non-subject Vehicles
MIC	49,972	2,258,055
UWC	1,314	71,948

TABLE 5-4 NUMBER OF EXTENDED WARRANTY POLICY 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 warranty data was last gathered on May 30, 2007.

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 following information: repairing dealer code, vehicle owner information, trouble code, trouble code description, part number, part description or verbatim text. 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 Motor'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 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
3i	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
71241	Product Liability Investigation Rep Pr
71242	PAR Repairs Reimbursement

TABLE 6-4: LABOR CODES USED IN CARD SEARCH

The MIC extended warranty data was also collected by searching for the labor codes listed in Table 6-1. 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 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 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 May 22, 2007.

* * *

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, 1999, 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