

**PE08042/GM
N0804243 RESPONSE**



September 3, 2008

Thomas Z. Cooper, Chief
 Vehicle Integrity Division
 Office of Defects Investigation
 National Highway Traffic Safety Administration
 1200 New Jersey Ave., S. E., Room W46-409
 Washington, D.C. 20590

N080243

NVS-212Ihs
 PE08-042

Dear Mr. Cooper:

This letter is General Motors (GM) response to your information request (IR), dated July 18, 2008, regarding allegations of failure or malfunction of the windshield wiper system installed in certain model year (MY) 2003 Hummer H2 vehicles. Per an agreement between GM and NHTSA, GM's response will be to items 1 through 6 of the information request.

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

1. **State, by model and any appropriate sub-group, the number of subject vehicles manufactured by GM 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, entitled "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	2003 MY
Hummer H2	47,926

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:
- 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, alleged to have resulted from alleged defect;
 - 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 "c," 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 listing 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 was filed to initiate the action.

Table 2-1 below summarizes records that may relate to the alleged defect. 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	93	0	0	0	0
Field Reports	17	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)	110	0	0	0	0
Total Vehicles with Reports (Unique VIN)	110	0	0	0	0

TABLE 2-1: 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. 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	07/31/08
Technical Assistance Center	08/06/08
Field Information Network Database (FIND)	07/30/08
Field Product Report Database (FPRD)	07/30/08
Company Vehicle Evaluation Program (CVEP)	07/23/08
Captured Test Fleet (CTF)	07/23/08
Early Quality Feedback (EQF)	07/23/08
Legal / Employee Self Insured Services (ESIS)/Product Liability Claims/ Lawsuits	07/30/08

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:
- 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 loss of vehicle control or crash is alleged;
 - Whether property damage is alleged;
 - Number, type and severity 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_03, refer to the Microsoft Access 2000 file labeled, "Q_03_REQUEST NUMBER TWO DATA." Some incident reports may not contain sufficient reliable information to accurately answer all parts of question 3.

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 any appropriate sub-group, 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 "WARRANTY DATA."

For the subject vehicles, the regular, goodwill and extended warranty claims are summarized by model and model year in Table 5-1. 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." A list of the labor codes, customer complaint codes and trouble codes used to collect the warranty data is provided in response to item No. 6.

HUMMER H2 MODEL YEAR	REGULAR WARRANTY	EXTENDED WARRANTY	TOTAL
2003 MY	1,779	160	1,939

TABLE 5-1: WARRANTY CLAIMS

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 August 18, 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.

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 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 that may be related to the alleged condition, listed in Table 6-1. Universal Warranty Corporation (UWC) does not use labor codes or trouble codes.

GM lists the trouble codes in Table 6-2 and the customer complaint codes in Table 6-3 associated with the claims that may be related to the alleged condition that GM used to collect 1,970 regular warranty claims.

The 1,970 warranty claims were then sorted by those with and those without meaningful verbatims. There were 191 verbatims that indicated that the wipers were functional and these claims are not being provided. Some verbatims do not provide any information related to customer experience regarding the subject components. The claims with verbatims that did not have meaning were treated as if there were no verbatim. There are 1,604 claims without meaningful verbatims and 175 claims with verbatims that indicate the claims may be related to inoperative wipers being provided by GM.

LABOR CODE	DESCRIPTION:
N3520	Motor, Wiper – Windshield Replace
Z1241	Product Liability/Investigation REP PR (Goodwill)
Z1242	PAR – Repairs/Reimbursement (Goodwill)

TABLE 6-1 LABOR CODES LABOR CODES USED IN WARRANTY SEARCH

TROUBLE CODE	DESCRIPTION:
1D	BROKEN
1W	CONDENSATION MOISTURE
2K	IMPROPERLY SEALED
5W	RUSTED/CORRODED
6B	COMPONENT GROUNDED
6C	COMPONENT INOPERATIVE
6D	COMPONENT INTERMITTENT
6F	COMPONENT OPEN
6G	COMPONENT SHORTED
6J	COMPONENT CORRODED

TABLE 6-2 TROUBLE CODES USED IN WARRANTY SEARCH

CUSTOMER COMPLAINT CODE	DESCRIPTION:
MJ	MISCELLANEOUS CUSTOMER SATISFACTION
07	OPERATION: NO MAINTAIN ADJUSTMENT
OA	OPERATION: BINDS
OE	OPERATION LACK OF DISENGAGE
OF	OPERATION: ENGAGE/DISENGAGE (EXCESSIVE EFFORT)
OJ	OPERATION: INOPERATIVE
OL	OPERATION: INTERMITTENT
OM	OPERATION: LOCKS/LOCK UP
OU	OPERATION: SHIFT LATE HESITATION
PG	PERFORMANCE: HARD START
PH	PERFORMANCE: HESITANT
PJ	PERFORMANCE: MISSING
VB	VISUAL: BROKEN
VN	VISUAL: LEAK/LEAKS

TABLE 6-3 CUSTOMER COMPLAINT CODES USED IN WARRANTY SEARCH

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

The subject vehicles are covered by a bumper-to-bumper new vehicle warranty for three years or 36,000 miles whichever occurs first. Many different extended warranty options are available through GM dealerships. They are offered at different prices and for varying lengths of time, based on customer's preference, up to 7 years from the date of purchase or up to a total of 100,000 vehicle miles.

The General Motor's warranty system does not contain information on the number of vehicles that have extended warranty coverage. The 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) are contained in Tables 6-2 and 6-3, respectively.

HUMMER H2 MODEL YEAR	MIC EXTENDED WARRANTY CONTRACTS SOLD
2003 MY	12,378

TABLE 6-2: MIC EXTENDED WARRANTY COVERAGE CONTRACTS SOLD BEFORE JULY 31, 2008

HUMMER H2 MODEL YEAR	EXTENDED WARRANTY CONTRACTS SOLD
2003 MY	54

TABLE 6-3: UWC EXTENDED WARRANTY COVERAGE CONTRACTS SOLD BEFORE JULY 24, 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

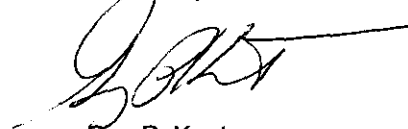
(whether or not incorporated) and affiliated enterprises and all of their headquarters, regional, zone and other offices and their employees, and all agents, contractors, consultants, attorneys and law firms and other persons engaged directly or indirectly (e.g., employee of a consultant) by or under the control of GM (including all business units and persons previously referred to), who are or, in or after calendar year 1996, 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. Kent', with a long horizontal flourish extending to the right.

Gay P. Kent
Director

Product Investigations

Attachments

PE08042/GM
N0804243 ORIGINAL IR



U.S. Department
of Transportation

**National Highway
Traffic Safety
Administration**

1200 New Jersey Avenue SE
Washington, DC 20590

1080243

Received
7-25-08

JUL 18 2008

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Ms. Gay Kent, Director
Product Investigations
General Motors Corporation
Mail Code 480-210-G11
30001 Van Dyke
Warren, MI 48090-9010

NVS-212lhs
PE08-042

Dear Ms. Kent:

This letter is to advise you that the Office of Defects Investigation (ODI) of the National Highway Traffic Safety Administration (NHTSA) has opened a Preliminary Evaluation (PE08-042) to investigate allegations of failure or malfunction of the windshield wiper system installed in certain vehicles sold by General Motors (GM). Such events may compromise driver visibility without warning in inclement weather. As part of this investigation, this letter requests certain information from GM.

This office has received six consumer complaints that allege complete failure or intermittent malfunction of the windshield wiper system installed as original equipment in MY 2003 Hummer H2 vehicles. In three of the six cases, the malfunction appears to have resulted from failure within the motor/control circuit board module. The consumer reports describe incidents of complete wiper failure, intermittent operation, and self activation of the wipers. Copies of the six consumer complaints are enclosed for your information.

Unless otherwise stated in the text of this letter, the following definitions apply to these information requests:

- **Subject vehicles:** All MY 2003 Hummer H2 vehicles manufactured for sale or lease in the United States.
- **Subject component:** The original equipment windshield wiper motor and/or its control module.
- **GM:** General Motors Corporation (GM), all of its past and present officers and employees, whether assigned to its principal offices or any of its field or other locations, including 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 calendar year 1996, 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.
- **Alleged defect:** failure or malfunction of motor and/or its control module that may result in improper operation or failure of the front windshield wiper system. This may include complete stoppage of the wiper function, intermittent wiper operation when set to a continuous mode, and failure of the wipers to activate on command.
 - **Document:** “Document(s)” is used in the broadest sense of the word and shall mean all original written, printed, typed, recorded, or graphic matter whatsoever, however produced or reproduced, of every kind, nature, and description, and all non-identical copies of both sides thereof, including, but not limited to, papers, letters, memoranda, correspondence, communications, electronic mail (e-mail) messages (existing in hard copy and/or in electronic storage), faxes, mailgrams, telegrams, cables, telex messages, notes, annotations, working papers, drafts, minutes, records, audio and video recordings, data, databases, other information bases, summaries, charts, tables, graphics, other visual displays, photographs, statements, interviews, opinions, reports, newspaper articles, studies, analyses, evaluations, interpretations, contracts, agreements, jottings, agendas, bulletins, notices, announcements, instructions, blueprints, drawings, as-builts, changes, manuals, publications, work schedules, journals, statistical data, desk, portable and computer calendars, appointment books, diaries, travel reports, lists, tabulations, computer printouts, data processing program libraries, data processing inputs and outputs, microfilms, microfiches, statements for services, resolutions, financial statements, governmental records, business records, personnel records, work orders, pleadings, discovery in any form, affidavits, motions, responses to discovery, all transcripts, administrative filings and all mechanical, magnetic, photographic and electronic records or recordings of any kind, including any storage media associated with computers, including, but not limited to, information on hard drives, floppy disks, backup tapes, and zip drives, electronic communications, including but not limited to, the Internet and shall include any drafts or revisions pertaining to any of the foregoing, all other things similar to any of the foregoing, however denominated by GM, any other data compilations from which information can be obtained, translated if necessary, into a usable form and any other documents. For purposes of this request, any document which contains any note, comment, addition, deletion, insertion, annotation, or otherwise comprises a non-identical copy of another document shall be treated as a separate document subject to production. In all cases where original and any non-identical copies are not available, “document(s)” also means any identical copies of the original and all non-identical copies thereof. Any

document, record, graph, chart, film or photograph originally produced in color must be provided in color. Furnish all documents whether verified by GM or not. If a document is not in the English language, provide both the original document and an English translation of the document.

- **Other Terms:** To the extent that they are used in these information requests, the terms “claim,” “consumer complaint,” “dealer field report,” “field report,” “fire,” “fleet,” “good will,” “make,” “model,” “model year,” “notice,” “property damage,” “property damage claim,” “rollover,” “type,” “warranty,” “warranty adjustment,” and “warranty claim,” whether used in singular or in plural form, have the same meaning as found in 49 CFR 579.4.

In order for my staff to evaluate the alleged defect, certain information is required. Pursuant to 49 U.S.C. § 30166, please provide numbered responses to the following information requests. Insofar as GM has previously provided a document to ODI, GM may produce it again or identify the document, the document submission to ODI in which it was included and the precise location in that submission where the document is located. When documents are produced, the documents shall be produced in an identified, organized manner that corresponds with the organization of this information request letter (including all individual requests and subparts). When documents are produced and the documents would not, standing alone, be self-explanatory, the production of documents shall be supplemented and accompanied by explanation.

Please repeat the applicable request verbatim above each response. After GM’s response to each request, identify the source of the information and indicate the last date the information was gathered.

1. State, by model and any appropriate sub-group, the number of subject vehicles manufactured by GM 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, entitled “PRODUCTION DATA.”

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:
 - 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, alleged to have resulted from alleged defect;
- 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 "c," 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 listing 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 was filed to initiate the action.

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. The category of the item, as identified in Request No. 2 (i.e., consumer complaint, field report, etc.);
 - b. Vehicle owner or fleet name (and fleet contact person), address, and telephone number;
 - c. Vehicle's VIN;
 - d. Vehicle's make, model and model year;
 - e. Vehicle's mileage at time of incident;
 - f. Incident date;
 - g. Report or claim date;
 - h. Whether a loss of vehicle control or crash is alleged;
 - i. Whether property damage is alleged;
 - j. Number, type and severity of alleged injuries, if any; and
 - k. Number of alleged fatalities, if any.

Provide this information in Microsoft Access 2000, or a compatible format, entitled "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.
5. State, by model and any appropriate sub-group, 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 "WARRANTY DATA."

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.
7. Produce copies of all service, warranty, and other documents that relate to, or may relate to, the alleged defect in the subject vehicles, issued by GM 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.
8. Describe all assessments, analyses, tests, test results, studies, surveys, simulations, investigations, inquiries and/or evaluations (collectively, "actions") that relate to, or may relate to, the alleged defect in the subject vehicles that have been conducted, are being conducted, are planned, or are being planned by, or for, GM. For each such action, provide the following information:
 - a. Action title or identifier;
 - b. The actual or planned start date;

other vehicles equipped with identical subject components, manufactured for sale or lease by GM in the United States. For each other MY, make and model of vehicles equipped with identical subject components, provide separate counts of the numbers of consumer complaints, field reports, and warranty claims received by GM to date.

10. Provide two samples of the subject component; one sample of a non-failed unit and one sample of a failed unit.
11. Describe all modifications or changes made by, or on behalf of, GM in the design, material composition, manufacture, quality control, supply, or installation of the subject component, from the start of production to date, which relate to, or may relate to, the alleged defect in the subject vehicles. For each such modification or change, provide the following information:
 - a. The date or approximate date on which the modification or change was incorporated into vehicle production;
 - b. A detailed description of the modification or change;
 - c. The reason(s) for the modification or change;
 - d. The part number(s) (service and engineering) of the original component;
 - e. The part number(s) (service and engineering) of the modified component;
 - f. Whether the original unmodified component was withdrawn from production and/or sale, and if so, when;
 - g. When the modified component was made available as a service component; and
 - h. Whether the modified component can be interchanged with earlier production components.

Also, provide the above information for any modification or change that GM is aware of which may be incorporated into vehicle production within the next 120 days.

12. Provide GM's assessment of the alleged defect in the subject vehicles, including:
 - a. The causal or contributory factor(s);
 - b. The failure mechanism(s);
 - c. The failure mode(s);
 - 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.

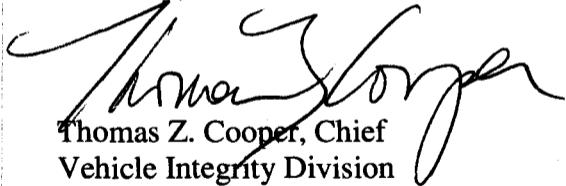
This letter is being sent to GM pursuant to 49 U.S.C. § 30166, which authorizes NHTSA to conduct any investigation that may be necessary to enforce Chapter 301 of Title 49 and to request reports and the production of things. It constitutes a new request for information. GM's failure to respond promptly and fully to this letter could subject GM to civil penalties pursuant to 49 U.S.C. § 30165 or lead to an action for injunctive relief pursuant to 49 U.S.C. § 30163. (Other remedies and sanctions are available as well.) Please note that maximum civil penalties under 49 U.S.C. § 30165 have increased as a result of the recent enactment of the Transportation Recall Enhancement, Accountability, and Documentation (TREAD) Act, Public Law No. 106-414 (signed November 1, 2000). Section 5(a) of the TREAD Act, codified at 49 U.S.C. § 30165(b), provides for civil penalties of up to \$6,000 per day, with a maximum of \$16,375,000 for a related series of violations, for failing or refusing to perform an act required under 49 U.S.C. § 30166. *See* 49 CFR 578.6 (as amended by 71 Fed. Reg. 28279 (May 16, 2006)). This includes failing to respond to ODI information requests.

If GM cannot respond to any specific request or subpart(s) thereof, please state the reason why it is unable to do so. If on the basis of attorney-client, attorney work product, or other privilege, GM does not submit one or more requested documents or items of information in response to this information request, GM must provide a privilege log identifying each document or item withheld, and state the date, subject or title, the name and position of the person(s) from, and the person(s) to whom it was sent, and the name and position of any other recipient (to include all carbon copies or blind carbon copies), the nature of that information or material, and the basis for the claim of privilege and why that privilege applies.

GM's response to this letter, in duplicate, together with a copy of any confidentiality request, must be submitted to this office by September 4, 2008. **All business confidential information must be submitted directly to the Office of Chief Counsel as described in the following paragraph and should not be sent to this office.** In addition, do not submit any business confidential information in the body of the letter submitted to this office. Please refer to PE08-042 in GM's response to this letter and in any confidentiality request submitted to the Office of Chief Counsel. If GM finds that it is unable to provide all of the information requested within the time allotted, GM must request an extension from me at (202) 366-5218 no later than five business days before the response due date. If GM is unable to provide all of the information requested by the original deadline, it must submit a partial response by the original deadline with whatever information GM then has available, even if an extension has been granted.

If GM claims that any of the information or documents provided in response to this information request constitute confidential commercial material within the meaning of 5 U.S.C. § 552(b)(4), or are protected from disclosure pursuant to 18 U.S.C. § 1905, GM must submit supporting information together with the materials that are the subject of the confidentiality request, in accordance with 49 CFR Part 512, as amended, to the Office of Chief Counsel (NCC-111), National Highway Traffic Safety Administration, Room W41-227, 1200 New Jersey Avenue,

Sincerely,

A handwritten signature in black ink, appearing to read "Thomas Z. Cooper". The signature is written in a cursive, flowing style with a large, sweeping flourish at the end.

Thomas Z. Cooper, Chief
Vehicle Integrity Division
Office of Defects Investigation

- c. The actual or expected end date;
- d. Brief summary of the subject and objective of the action;
- e. Engineering group(s)/supplier(s) responsible for designing and for conducting the action;
and
- f. A brief summary of the findings and/or conclusions resulting from the action.

For each action identified, provide copies of all documents related to the action, regardless of whether the documents are in interim, draft, or final form. Organize the documents chronologically by action.

9. Provide a complete engineering description and appropriate engineering specifications of the subject components installed in the subject vehicles. Identify by MY, make, and model, all other vehicles equipped with identical subject components, manufactured for sale or lease by GM in the United States. For each other MY, make and model of vehicles equipped with identical subject components, provide separate counts of the numbers of consumer complaints, field reports, and warranty claims received by GM to date.
10. Provide two samples of the subject component; one sample of a non-failed unit and one sample of a failed unit.
11. Describe all modifications or changes made by, or on behalf of, GM in the design, material composition, manufacture, quality control, supply, or installation of the subject component, from the start of production to date, which relate to, or may relate to, the alleged defect in the subject vehicles. For each such modification or change, provide the following information:
 - a. The date or approximate date on which the modification or change was incorporated into vehicle production;
 - b. A detailed description of the modification or change;
 - c. The reason(s) for the modification or change;
 - d. The part number(s) (service and engineering) of the original component;
 - e. The part number(s) (service and engineering) of the modified component;
 - f. Whether the original unmodified component was withdrawn from production and/or sale, and if so, when;
 - g. When the modified component was made available as a service component; and
 - h. Whether the modified component can be interchanged with earlier production components.

Also, provide the above information for any modification or change that GM is aware of which may be incorporated into vehicle production within the next 120 days.

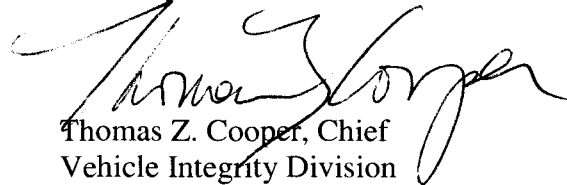
12. Provide GM's assessment of the alleged defect in the subject vehicles, including:
 - a. The causal or contributory factor(s);
 - b. The failure mechanism(s);
 - c. The failure mode(s);
 - d. The risk to motor vehicle safety that it poses;

S.E., Washington, D.C. 20590. GM is required to **submit two copies of the documents containing allegedly confidential information (except only one copy of blueprints) and one copy of the documents from which information claimed to be confidential has been deleted.** Please remember that the word "CONFIDENTIAL BUSINESS INFORMATION" must appear at the top of each page containing information claimed to be confidential, and the information must be clearly identified in accordance with 5 U.S.C. § 512.6. If GM submits a request for confidentiality for all or part of its response to this IR, that is in an electronic format (e.g., CD-ROM), GM's request and associated submission must conform to the new requirements in NHTSA's Confidential Business Information Rule regarding submissions in electronic formats (49 CFR 512.6(c)). See Federal Register, volume 72, page 59434 (October 19, 2007).

Please send email notification to Lee Strickland (Leamon.Strickland@dot.gov) and to ODI_IRresponse@dot.gov when GM sends its response to this office and indicate whether there is confidential information as part of GM's response.

If you have any technical questions concerning this matter, please call Lee Strickland of my staff, at (202) 366-5201.

Sincerely,

A handwritten signature in black ink, appearing to read "Thomas Z. Cooper". The signature is fluid and cursive, with a large, sweeping flourish at the end.

Thomas Z. Cooper, Chief
Vehicle Integrity Division
Office of Defects Investigation