



U.S. Department
of Transportation
**National Highway
Traffic Safety
Administration**

NOV 21 2008

1200 New Jersey Avenue SE
Washington, DC 20590

*Original
Received
01-Dec-2008*

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

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

NVS-213cnl
PE08-061

Dear Ms. Kent:

This letter is to inform you that the Office of Defects Investigation (ODI) of the National Highway Traffic Safety Administration (NHTSA) has opened a Preliminary Evaluation (PE08-061) to investigate allegations of timing chain breakage resulting in engine stall with no restart in certain model year (MY) 2000 through 2002 Saturn L-series manufactured by General Motors, and to request certain information about these vehicles and similarly equipped peer vehicles.

Since the closing of EA06-009, ODI has received 124 complaints from Saturn L-Series owners that experienced a timing chain failure but were not included in GM's recall for vehicles equipped with the L61 2.2L engine built from the beginning of November 2000 through the end of February 2001. In addition ODI has received a total of 38 owner complaints which allege timing chain failure for similarly equipped peer vehicles such as the Saturn Vue, Oldsmobile Alero and Pontiac Sunfire.

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

- **Subject vehicles:** all MY 2000 through 2003 Saturn L-series vehicles equipped with 2.2L L61 engines, manufactured for sale or lease in the United States and not included in the subject recall.
- **Peer vehicles:** all MY 2002 through 2003 Saturn VUE and ION, Chevrolet Cavalier, Pontiac Sunfire and Grand Am, and Oldsmobile Alero vehicles equipped with 2.2L L61 engines that were manufactured for sale or lease in the United States and are within the scope of the subject service bulletin or the peer vehicle service bulletin.
- **Vehicle sub-populations:** the following sets of vehicles that are covered by the subject service bulletin or the peer vehicle service bulletin:
 1. MY 2001 Saturn L-series vehicles recalled in 07V-519;
 2. Subject Saturn L-series vehicles built before the recall population;



3. Subject Saturn L-series vehicles built after the recall population and before the subject design changes were implemented in vehicle production;
 4. Subject Saturn L-series vehicles built after the subject design changes were implemented in vehicle production; and
 5. Each model of peer vehicles built before the subject design changes were implemented in vehicle production.
- **Subject assembly:** Timing chain assembly, including timing chain oil nozzle.
 - **Subject design changes:** The design changes to the oil nozzle and timing chain assembly that were identified in GM's response to Request 9 of ODI's information request letter for PE06-009 (GM 686). The GM response indicated that the changes were implemented in production on April 22, 2002 (Tonawanda) and May 1, 2002 (Springhill).
 - **Subject service bulletin:** GM technical service bulletin 03-06-01-017 (June 9, 2003), "Service Information - Timing Chain Design Change and Revised Service Procedures."
 - **Peer vehicle service bulletin:** GM technical service bulletin PI00434A (March 22, 2004), "2.2 L61 Engine Crank, No Start."
 - **Subject recall:** NHTSA Recall No. 07V-519.
 - **GM:** General Motors Corporation, 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 January 1, 2000, 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:** Timing chain failure.
 - **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 model year, the number of subject and peer 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. Plant of manufacture;
 - f. Date of manufacture;
 - g. Date warranty coverage commenced; and
 - h. 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 2003, or a compatible format, entitled "PRODUCTION DATA." See Enclosure 1, Data Collection Disc, for a pre-formatted table that provides further details regarding this submission.

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 and peer vehicles:
 - a. Consumer complaints, including those from fleet operators;
 - b. Consumer complaints, including those from operators, where a vehicle stall was reported
 - c. Field reports, including dealer field reports;
 - d. Field reports, including dealer field reports where a vehicle stall was reported;
 - e. 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;
 - f. Property damage claims;
 - g. Third-party arbitration proceedings where GM is or was a party to the arbitration; and
 - h. 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 "e" through "h," 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 g and h, 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.

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 VIN;
 - 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 any warning lights were illuminated at the time the alleged defect occurred;
 - j. Whether the vehicle was towed into the dealership;
 - k. Whether the vehicle stalled as a result of the alleged defect;
 - l. Whether the driver was able to restart the vehicle, after the vehicle stalled;
 - m. If the driver was able to restart the vehicle after stalling, what amount of time did it take;
 - n. Diagnostic Trouble Code(s) (DTCs) indicated at the time of repair;
 - o. Repair(s) dealer made to the vehicle;
 - p. Whether a crash is alleged;
 - q. Whether property damage is alleged;
 - r. Number of alleged injuries;
 - s. Number of alleged fatalities; and
 - t. A summary of the incident.

Provide this information in Microsoft Access 2003, or a compatible format, entitled "REQUEST NUMBER TWO DATA." See Enclosure 1, Data Collection Disc, for a pre-formatted table that provides further details regarding this submission.

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 model year, total counts for all of the following categories of claims, collectively, that have been paid by GM to date that relate to repair or replacement of the timing chain in the subject and peer vehicles: warranty claims; extended warranty claims; claims for good will services; and field, zone, or similar adjustments and reimbursements. This should include all claims made in accordance with procedures specified in service bulletins issued by GM related to the subject components.

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. Whether there was a claim for towing within three days before or after the subject claim (yes/no);
- h. Whether there is any other reference to towing in the claim (yes/no);
- i. Labor operation number;
- j. Problem code;
- k. Diagnostic Trouble Code(s) (DTCs) indicated at the time of repair;
- l. Replacement part number(s) and description(s);
- m. Concern stated by customer;
- n. Comment, if any, by dealer/technician relating to claim and/or repair;
- o. GM's assessment of whether the claim was associated with an engine stall while driving incident; and
- p. If the claim is not associated with an engine stall incident, state the reason for the repair (e.g., no start, noise, driveability, check engine light, and others as appropriate).

Provide this information in Microsoft Access 2003, or a compatible format, entitled "WARRANTY DATA." See Enclosure 1, Data Collection Disc, for a pre-formatted table that provides further details regarding this submission.

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, 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.
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;
- 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. State the number of subject components that GM has sold that may be used in the subject vehicles by part number (both service and engineering/production) and month/year of sale *(including the cut-off date for sales, if applicable)*.

For each component part number, provide the supplier's name, address, and appropriate point of contact (name, title, and telephone number). Also identify by make, model and model year, all vehicle applications that use the component, whether installed in production or in service, and state the applicable dates of production or service usage.

10. Provide a table with the following information regarding actual timing chain failure frequencies for each vehicle sub-population as defined in this letter:
 - a. Vehicle production count;
 - b. Total complaints;
 - c. Total warranty claims;
 - d. For each of the following service intervals state the number of each sub-population that have reached that time-in-service and the number of complaints and warranty claims received within each service interval: 12-, 24-, 36-, 48-, 60-, and 72-months;
 - e. State GM's assessment of the percentages of timing chain complaints that involve stall while driving for each sub-population (alternatively, if GM does not believe that the percentages for the sub-populations are significantly different, state an approximate percentage that would apply to all);
 - f. For complaints that GM does not believe involve stall while driving, provide a breakdown of the percentages associated with other conditions (e.g., no start, noise, driveability, check engine light);
 - g. State GM's assessment of the percentages of timing chain warranty claims that involve stall while driving for each sub-population (alternatively, if GM does not believe that the percentages for the sub-populations are significantly different, state an approximate percentage that would apply to all); and
 - h. For warranty claims that GM does not believe involve stall while driving, provide a breakdown of the percentages associated with other conditions (e.g., no start, noise, driveability, check engine light).
11. Provide a table with the following information regard statistically estimated/modeled timing chain failure frequencies for each vehicle sub-population as defined in this letter:

- a. A short description of the method/model used for the statistical analysis, including the bases for selecting each method, explanations for any differences in modeling methods for different sub-populations, and the report period used for the analysis (e.g., warranty period);
 - b. Charts showing the model results for each sub-population;
 - c. The results of the analysis (e.g., slope and characteristic life parameters if a 2-parameter Weibull model is used);
 - d. The estimated failure rates at 12-, 24-, 36-, 48-, 60-, and 72-months-in-service.
12. Describe, and provide copies of all documents relating to, all owner surveys conducted to gather data about the number of timing chain warranty claims that involved engine stall and the circumstances associated with such stalls (e.g., vehicle speed, restart, comments regarding steering and/or braking difficulty, time of day, road and traffic conditions, whether the vehicle stopped in the road or coasted off the road, etc). Please summarize the results of all such surveys in a table and provide the data electronically.
 13. Explain how the scopes of the subject service bulletin and peer vehicle service bulletin were determined and why the bulletins appear to cover vehicles built before and after the subject design changes were implemented in production.
 14. Provide one sample each of the following:
 - a. The timing chain kits identified in the subject and peer vehicle service bulletins; and
 - b. Three samples of broken timing chains from subject vehicle warranty returns.
 15. Furnish GM's assessment of how each of the following aspects of the alleged defect for the vehicles covered by the subject recall are different in the other Saturn L-series vehicles that are the subject of this Preliminary Evaluation and the peer vehicles of this information request that use the same engine:
 - a. The causal or contributory factor(s);
 - b. The failure mechanism(s);
 - c. The failure mode(s);
 - d. The overall timing chain failure rates at the intervals identified in Requests 11 and 12;
 - e. The reason(s) for differences noted in 14.d;
 - f. The percentage of timing chain failures resulting in engine stall and the reason(s) for any differences noted;
 - g. The ability to restart a vehicle that has stalled due to the alleged defect;
 - h. The risk to motor vehicle safety that it poses;
 - i. 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
 - j. 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 \$5,000 per day, with a maximum of \$16,050,000 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 69 Fed. Reg. 57864 (Sept. 28, 2004)). This includes failing to respond to ODI information requests.

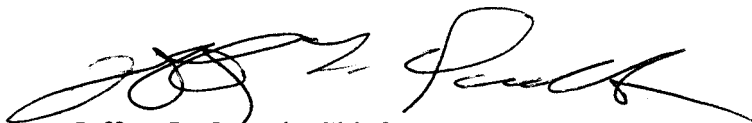
If GM cannot respond to any specific request or subpart(s) thereof, please state the reason why it is unable to do so. If on the basis of attorney-client, attorney work product, or other privilege, GM does not submit one or more requested documents or items of information in response to this information request, GM must provide a privilege log identifying each document or item withheld, and stating 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 January 28, 2008. Please refer to PE08-061 in GM's response to this letter. 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) 366-5207 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 (69 Fed. Reg. 21409 et seq; April 21, 2004), to the Office of Chief Counsel (NCC-113), National Highway Traffic Safety Administration, Room 5219, 400 Seventh Street, S.W., 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.

If you have any technical questions concerning this matter, please call Chris Lash of my staff at (202) 366-2370.

Sincerely,

A handwritten signature in black ink, appearing to read "Jeffrey L. Quandt", with a stylized, flowing script.

Jeffrey L. Quandt, Chief
Vehicle Control Division
Office of Defects Investigation

Enclosure 1, One CD ROM titled Data Collection Disc and VOQs containing four files

N080215A PARTIAL RESPONSE



GENERAL MOTORS CORPORATION

Vehicle Structure & Safety Integration

January 28, 2009

Jeffrey L. Quandt, Chief
Vehicle Control Division
Office of Defects Investigation
National Highway Traffic Safety Administration
1200 New Jersey Ave., S. E., Room W46-409
Washington, D.C. 20590

N080215A Partial

NVS-213cnl
PE08-061

Dear Mr. Quandt:

This letter is General Motors (GM) response to your information request (IR), dated November 21, 2008, to investigate allegations of timing chain breakage resulting in engine stall, with no restart, in certain model year (MY) 2000 through 2002 Saturn L-series with a 2.2L 4-cylinder (RPO - L61) engine, and similarly equipped 2002 through 2003 Saturn VUE and ION, Chevrolet Cavalier, Pontiac Sunfire and Grand Am and Oldsmobile Alero peer vehicles manufactured by General Motors. As was agreed upon in a discussion between GM and NHTSA ODI on January 21, 2009, this letter responds to Questions 1-5. In addition, GM is also providing responses to Questions 6-9 and 12-14. GM will submit the responses to Questions 10, 11 and 15 on February 4, 2009.

For the subject vehicles, unless otherwise stated, GM is providing an update of reports and warranty claims that may be related to timing chain repairs received after July 1, 2008 by GM since the information was last reported to the NHTSA in response to Defect Petition (DP08-002) on August 8, 2008. Also, GM previously provided the NHTSA with information related to the alleged condition in the 2000 through 2002 Saturn L-series in Preliminary Evaluation (PE06-006) response on April 12, 2006 and Engineering Analysis (EA06-009) response on April 24, 2007 that are not included in this response. GM reports, regular warranty and extended service contract claims for subject vehicles that were included in the recall have been omitted.

For the peer vehicles, GM is providing all reports, regular warranty and extended service contract claims that may be related to timing chain repairs.

Your questions and our corresponding replies are as follows:

1. **State, by model and model year, the number of subject and peer 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. **Plant of manufacture;**
 - f. **Date of manufacture;**
 - g. **Date warranty coverage commenced; and**
 - h. **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 2003, or a compatible format, entitled "PRODUCTION DATA." See Enclosure 1, Data Collection Disc, for a pre-formatted table that provides further details regarding this submission.

General Motors is providing the number of subject and peer vehicles in Tables 1-1 and 1-2 produced for sale or lease in the United States by model and model year.

<u>Make/ Model/ Model Year</u>	<u>2000</u>	<u>2001</u>	<u>2002</u>	<u>2003</u>	<u>Total</u>
Saturn L-series	52,769	40,245*	70,964	58,393	222,371

TABLE 1-1 SUBJECT VEHICLE PRODUCTION
*RECALL POPULATION NOT INCLUDED - 20,418 VEHICLES

<u>Make/ Model/ Model Year</u>	<u>2002</u>	<u>2003</u>	<u>Total</u>
Saturn VUE	13,056	59,256	72,312
Saturn ION	*	96,271	96,271
Chevrolet Cavalier	21,704	218,010	239,714
Pontiac Sunfire	12,316	37,825	50,141
Pontiac Grand Am	69,227	38,077	107,304
Oldsmobile Alero	37,530	54,184	91,714
Total	153,833	503,623	657,456

TABLE 1-2 PEER VEHICLE PRODUCTION
*THE SATURN ION BEGAN PRODUCTION IN THE 2003MY

The production information requested in 1a-h is provided on the Att_1_GM disk, in the folder labeled: "Q_01"; refer to the Microsoft Access 2000 file labeled PRODUCTION DATA. GM is providing the state where the vehicle was shipped in response to request 1h. 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 and peer vehicles:
 - a. Consumer complaints, including those from fleet operators;
 - b. Consumer complaints, including those from operators, where a vehicle stall was reported
 - c. Field reports, including dealer field reports;
 - d. Field reports, including dealer field reports where a vehicle stall was reported;
 - e. 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;
 - f. Property damage claims;
 - g. Third-party arbitration proceedings where GM is or was a party to the arbitration; and
 - h. 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 "e" through "h," 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 g and h, 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.

GM is providing information in response to Question 2 as follows:

Tables 2-1 and 2-2 summarize subject and peer vehicle records that indicate engine stall while driving as a result of a broken timing chain.

Tables 2-3 and 2-4 below summarize subject and peer vehicle records that indicate engine stall as a result of a broken timing chain but did not indicate whether the vehicle was parked or being driven (Unknown driving condition).

Tables 2-5 and 2-6 summarize subject and peer vehicle records that describe a no start condition as a result of a broken timing chain.

GM identified 1,437 reports for subject and peer vehicles related to repairs of the timing chain including the timing chain tensioner or timing chain oil system. Of the 1,437 reports, 899 reports are not included in the tables below because the verbatim lacked sufficient information to determine if the vehicle had a stall or no start condition or is related to driveability concerns (e.g., noise, driveability, check engine light, and others as appropriate). This 1,437 includes incremental reports for the subject vehicles beyond those reports submitted in the PE06-006, EA06-009, DP08-002 and excludes the recall population. This also includes the total reports for the peer vehicles. These 899 reports are included in the database responsive to Question 3.

TYPE OF REPORT	GM REPORTS	SUBCATEGORIES			
		CORRESPONDING TO NHTSA REPORTS	NUMBER WITH PROPERTY DAMAGE	NUMBER WITH CRASH	NUMBER WITH INJURIES/FATALITIES
Owner Reports	35	8	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)	35	8	0	0	0
Total Vehicles with Reports (Unique VIN)	35	8	0	0	0

TABLE 2-1: REPORT CLASSIFICATION – SUBJECT VEHICLE: STALL WHILE DRIVING

TYPE OF REPORT	GM REPORTS	SUBCATEGORIES			
		CORRESPONDING TO NHTSA REPORTS	NUMBER WITH PROPERTY DAMAGE	NUMBER WITH CRASH	NUMBER WITH INJURIES/FATALITIES
Owner Reports	127	1	0	0	0
Field Reports	56	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)	183	1	0	0	0
Total Vehicles with Reports (Unique VIN)	182	1	0	0	0

TABLE 2-2: REPORT CLASSIFICATION – PEER VEHICLE: STALL WHILE DRIVING

TYPE OF REPORT	GM REPORTS	SUBCATEGORIES			
		CORRESPONDING TO NHTSA REPORTS	NUMBER WITH PROPERTY DAMAGE	NUMBER WITH CRASH	NUMBER WITH INJURIES/FATALITIES
Owner Reports	5	2	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)	5	2	0	0	0
Total Vehicles with Reports (Unique VIN)	5	2	0	0	0

TABLE 2-3: REPORT CLASSIFICATION – SUBJECT VEHICLE: STALL WITH UNKNOWN DRIVING CONDITION

TYPE OF REPORT	GM REPORTS	SUBCATEGORIES			
		CORRESPONDING TO NHTSA REPORTS	NUMBER WITH PROPERTY DAMAGE	NUMBER WITH CRASH	NUMBER WITH INJURIES/FATALITIES
Owner Reports	56	0	0	0	0
Field Reports	43	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)	99	0	0	0	0
Total Vehicles with Reports (Unique VIN)	98	0	0	0	0

TABLE 2-4: REPORT CLASSIFICATION – PEER VEHICLE: STALL WITH UNKNOWN DRIVING CONDITION

TYPE OF REPORT	GM REPORTS	SUBCATEGORIES			
		CORRESPONDING TO NHTSA REPORTS	NUMBER WITH PROPERTY DAMAGE	NUMBER WITH CRASH	NUMBER WITH INJURIES/FATALITIES
Owner Reports	18	2	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)	18	2	0	0	0
Total Vehicles with Reports (Unique VIN)	18	2	0	0	0

TABLE 2-5: REPORT CLASSIFICATION – SUBJECT VEHICLE: NO START

TYPE OF REPORT	GM REPORTS	SUBCATEGORIES			
		CORRESPONDING TO NHTSA REPORTS	NUMBER WITH PROPERTY DAMAGE	NUMBER WITH CRASH	NUMBER WITH INJURIES/FATALITIES
Owner Reports	16	0	0	0	0
Field Reports	182	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)	198	0	0	0	0
Total Vehicles with Reports (Unique VIN)	198	0	0	0	0

TABLE 2-6: REPORT CLASSIFICATION – PEER VEHICLE: NO START

Currently there is pending a multi-district litigation proceeding wherein plaintiffs have filed a consolidated putative class action complaint which involves alleged claims related to alleged timing chain defects in the subject vehicles. The matter is pending in the United States District Court for the District of Nebraska. The matter is captioned: "In Re Saturn L-Series Timing Chain Products Liability Litigation, Case Number 8:07CV298, MDL No. 1920."

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.

SOURCE SYSTEM	LAST DATE GATHERED
Customer Assistance Center (CAC)	12/10/2008
Technical Assistance Center (TAC)	1/15/2009
Field Information Network Database (FIND)	12/15/2008
Company Vehicle Evaluation Program (CVEP)	12/4/2008
Captured Test Fleet (CTF)	12/4/2008
Early Quality Feedback (EQF)	12/4/2008
Field Product Report Database (FPRD)	1/5/2009
Legal / Employee Self Insured Services (ESIS) / Product Liability Claims and Lawsuits	1/9/2009

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:
- 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 any warning lights were illuminated at the time the alleged defect occurred;
 - Whether the vehicle was towed into the dealership;
 - Whether the vehicle stalled as a result of the alleged defect;
 - Whether the driver was able to restart the vehicle, after the vehicle stalled;
 - If the driver was able to restart the vehicle after stalling, what amount of time did it take;
 - Diagnostic Trouble Code(s) (DTCs) indicated at the time of repair;
 - Repair(s) dealer made to the vehicle;
 - Whether a crash is alleged;
 - Whether property damage is alleged;
 - Number of alleged injuries;
 - Number of alleged fatalities; and
 - A summary of the incident.

Provide this information in Microsoft Access 2003, or a compatible format, entitled "REQUEST NUMBER TWO DATA." See Enclosure 1, Data Collection Disc, for a pre-formatted table that provides further details regarding this submission.

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". GM reviewed reports responsive to this request and when sufficient information responsive to Question 3i-n was available, it was noted in Codes 1-3 of the MS Access database.

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 AND 2-2 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, total counts for all of the following categories of claims, collectively, that have been paid by GM to date that relate to repair or replacement of the timing chain in the subject and peer vehicles: warranty claims; extended warranty claims; claims for good will services; and field, zone, or similar adjustments and reimbursements. This should include all claims made in accordance with procedures specified in service bulletins issued by GM related to the subject components.

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. **Whether there was a claim for towing within three days before or after the subject claim (yes/no);**
- h. **Whether there is any other reference to towing in the claim (yes/no);**
- i. **Labor operation number;**
- j. **Problem code;**
- k. **Diagnostic Trouble Code(s) (DTCs) indicated at the time of repair;**
- l. **Replacement part number(s) and description(s);**
- m. **Concern stated by customer;**
- n. **Comment, if any, by dealer/technician relating to claim and/or repair;**
- o. **GM's assessment of whether the claim was associated with an engine stall while driving incident; and**
- p. **If the claim is not associated with an engine stall incident, state the reason for the repair (e.g., no start, noise, driveability, check engine light, and others as appropriate).**

Provide this information in Microsoft Access 2003, or a compatible format, entitled "WARRANTY DATA." See Enclosure 1, Data Collection Disc, for a pre-formatted table that provides further details regarding this submission.

Regular Warranty

The focus of this investigation is engine stall while driving as a result of timing chain breakage. GM searched the GM Claims Analytical Reporting Database (CARD) regular warranty and the Motors Insurance Corp (MIC) extended service contract claims databases using the 32 labor codes (listed in "Q_5", "Labor code" file on the Att_1_GM disk) used in response to PE06-006, EA06-009 and DP08-002. While reviewing the claim verbatims, GM determined whether the claim indicated a stall (no-info or while driving), no-start or driveability (engine noise, I/P lamp, DTC or other) issue and is included with the claim in the database. GM then reviewed the customer descriptions (cust_desc) codes for no-start or driveability issues when available. GM removed claims such as "engine assembly replace" that mention engine overheat, poor maintenance, fluid leaks, stuck valves, etc. but contained no reference to a broken timing chain. The claims related; to stall while driving, stall with unknown driving condition and a no start condition are summarized in the tables below.

In Tables 5-1 and 5-2, GM states the number of unique VIN regular warranty claims for subject and peer vehicles where the verbatim indicated the engine stalled while driving and where the timing chain assembly was the likely cause.

MAKE/MODEL	2000MY	2001MY	2002MY	2003MY	TOTAL
Saturn L-series	1	7	5	0	13

TABLE 5-1 REGULAR WARRANTY CLAIMS (UNIQUE VINS) – SUBJECT VEHICLE: STALLED WHILE DRIVING

MAKE/MODEL	2002MY	2003MY	TOTAL
Saturn VUE	2	1	3
Saturn ION	*	1	1
Chevrolet Cavalier	2	3	5
Pontiac Sunfire	5	1	6
Pontiac Grand Am	30	1	31
Oldsmobile Alero	15	0	15
TOTAL	54	7	61

TABLE 5-2 REGULAR WARRANTY CLAIMS (UNIQUE VINS) – PEER VEHICLE: STALLED WHILE DRIVING

*THE SATURN ION BEGAN PRODUCTION IN THE 2003MY

In Tables 5-3 and 5-4, GM states the number of unique VIN regular warranty claims for subject and peer vehicles where the verbatim indicated a stall, engine quit/died and the timing chain was replaced but there was not information to determine if the incident occurred when the vehicle was parked or if the engine stalled while driving.

MAKE/MODEL	2000MY	2001MY	2002MY	2003MY	TOTAL
Saturn L-series	0	1	4	0	5

TABLE 5-3 REGULAR WARRANTY CLAIMS (UNIQUE VINS) –SUBJECT VEHICLE: STALL WITH UNKNOWN DRIVING CONDITION

MAKE/MODEL	2002MY	2003MY	TOTAL
Saturn VUE	0	0	0
Saturn ION	*	0	0
Chevrolet Cavalier	0	4	4
Pontiac Sunfire	2	0	2
Pontiac Grand Am	2	0	2
Oldsmobile Alero	3	0	3
TOTAL	7	4	11

TABLE 5-4 REGULAR WARRANTY CLAIMS (UNIQUE VINS) –PEER VEHICLE: STALL WITH UNKNOWN DRIVING CONDITION

*THE SATURN ION BEGAN PRODUCTION IN THE 2003MY

In Tables 5-5 and 5-6, GM states the number of unique VIN regular warranty claims for subject and peer vehicles where the customer trouble code or verbatim indicated a no start condition as a result of a broken timing chain.

MAKE/MODEL	2000MY	2001MY	2002MY	2003MY	TOTAL
Saturn L-series	3	22	8	0	33

TABLE 5-5 REGULAR WARRANTY CLAIMS (UNIQUE VINS) –SUBJECT VEHICLE: NO START

MAKE/MODEL	2002MY	2003MY	TOTAL
Saturn VUE	2	1	3
Saturn ION	*	0	0
Chevrolet Cavalier	83	255	338
Pontiac Sunfire	105	52	157
Pontiac Grand Am	849	27	876
Oldsmobile Alero	223	50	273
TOTAL	1262	385	1647

TABLE 5-6 REGULAR WARRANTY CLAIMS (UNIQUE VINS) –PEER VEHICLE: NO START

*THE SATURN ION BEGAN PRODUCTION IN THE 2003MY

Motors Insurance Corp (MIC) AND Universal Warranty Corp. (UWC) Service Contract Claims

The MIC extended service contract claim database was searched using the same 32 labor codes used for the regular warranty. UWC Service Contract Claims database was searched through a process that identifies the applicable vehicle system, parts descriptions, and keywords. GM reviewed the MIC AND UWC Service Contract Claims verbatims and has identified claims where it was reported that the vehicle stalled while driving and the timing chain was broken. The information is summarized in Tables 5-7 and 5-8.

MAKE/MODEL	2000MY	2001MY	2002MY	2003MY	TOTAL
Saturn L-series	0	0	0	0	0

TABLE 5-7 MIC AND UWC Service Contract Claims (UNIQUE VINS) - SUBJECT VEHICLE: STALL WHILE DRIVING

MAKE/MODEL	2002MY	2003MY	TOTAL
Saturn VUE	0	0	0
Saturn ION	*	0	0
Chevrolet Cavalier	1	2	3
Pontiac Sunfire	2	0	2
Pontiac Grand Am	7	0	7
Oldsmobile Alero	6	0	6
TOTAL	16	2	18

TABLE 5-8 MIC AND UWC Service Contract Claims (UNIQUE VINS) - PEER VEHICLE: STALL WHILE DRIVING

*THE SATURN ION BEGAN PRODUCTION IN THE 2003MY

In Tables 5-9 and 5-10, GM states the number of MIC and UWC extended warranty claims where the comment mentioned stall, engine quit/ died and the timing chain was replaced but there was not information to determine if the incident occurred when the vehicle was parked or if the engine stalled while driving.

MAKE/MODEL	2000MY	2001MY	2002MY	2003MY	TOTAL
Saturn L-series	0	0	0	0	0

TABLE 5-9 MIC AND UWC Service Contract Claims (UNIQUE VINS) - SUBJECT VEHICLE: STALL WITH UNKNOWN DRIVING CONDITION

MAKE/MODEL	2002MY	2003MY	TOTAL
Saturn VUE	0	0	0
Saturn ION	*	0	0
Chevrolet Cavalier	0	0	0
Pontiac Sunfire	1	0	1
Pontiac Grand Am	5	0	5
Oldsmobile Alero	5	1	6
TOTAL	11	1	12

TABLE 5-10 MIC AND UWC Service Contract Claims (UNIQUE VINS) - PEER VEHICLE: STALL WITH UNKNOWN DRIVING CONDITION

*THE SATURN ION BEGAN PRODUCTION IN THE 2003MY

In Tables 5-11 and 5-12, GM states the number of MIC and UWC extended warranty claims where the customer trouble code or comment mentioned no start condition as a result of a broken timing chain.

MAKE/MODEL	2000MY	2001MY	2002MY	2003MY	TOTAL
Saturn L-series	0	0	0	0	0

TABLE 5-11 MIC AND UWC Service Contract Claims (UNIQUE VINS) - SUBJECT VEHICLE: NO START

MAKE/MODEL	2002MY	2003MY	TOTAL
Saturn VUE	0	0	0
Saturn ION	*	1	1
Chevrolet Cavalier	37	52	89
Pontiac Sunfire	29	5	34
Pontiac Grand Am	128	4	132
Oldsmobile Alero	143	10	153
TOTAL	337	72	409

TABLE 5-12 MIC AND UWC Service Contract Claims (UNIQUE VINS) - PEER VEHICLE: NO START

*THE SATURN ION BEGAN PRODUCTION IN THE 2003MY

GM identified 5,200 regular warranty and extended service contract claims (including duplicate VINS) related to repairs of the timing chain including the timing chain tensioner or timing chain oil system. Of the 5,200 warranty and extended service contract claims, 2,991 claims are not included in the tables below because the verbatim or customer code lacked sufficient information to determine if the vehicle had a stall or no start condition or is related to driveability concerns. This 5,200 includes incremental claims for the subject vehicles beyond those reports submitted in the PE, EA and DP and excludes the recall population. These 2,991 warranty and extended service claims are included in the database responsive to Question 5.

The Motors Insurance Corp (MIC) Service Contract Claim system does not contain the vehicle owner information. The Universal Warranty Corporation (UWC) Service Contract Claim 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.

A summary of the claims for Tables 5-1 through 5-12 (all claims including duplicate VINs) are provided on the Att_1_GM disk; refer to the folder labeled: "Q_5." The information requested in 5g-j and p may be contained within the regular MIC and UWC Service Contract Claims. In response to the information requested in 5o and p, GM has provided the information within the database.

The sources of the requested information and the last date the searches were conducted are tabulated in Table 5-13 below.

SOURCE SYSTEM	LAST DATE GATHERED
GM CARD --regular warranty	12/15/2008
Motors Insurance Corporation (MIC) – extended service contract	12/15/2008
Universal Warranty Corporation (UWC) – extended service contract	1/20/2009

TABLE 5-13: DATA SOURCES

The regular warranty and extended service contract claim data provided has limited analytical value in analyzing the field performance of a motor vehicle component. These records do not contain sufficient information to establish the condition of the part at the time of the repair 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, labor, and other (such as towing and rental car) 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.**

See the response to question 5 for the search criteria used to identify warranty claims.

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 service contract 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 warranty system does not contain information on the number of vehicles that have extended service contract coverage. The total number of extended service contracts on the subject vehicles that have been sold by MIC and UWC regardless of status (in-force, expired, cancelled) as of December 15, 2008 is contained in Tables 6-1 and 6-2.

MAKE/MODEL	2000MY	2001MY	2002MY	2003MY	TOTAL
Saturn L-series	23,740	24,907	29,054	20,503	98,204

TABLE 6-1 SUBJECT VEHICLE: MIC EXTENDED SERVICE CONTRACTS SOLD

MAKE/MODEL	TOTAL
Saturn L-series	1,185

TABLE 6-2 SUBJECT VEHICLE: UWC EXTENDED SERVICE CONTRACTS SOLD

7. **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.**

GM has identified the following communications and bulletins that are related to the alleged defect on the subject vehicles. The information is listed in Table 7 below. Copies of the communications are provided on the Att_1_GM disk; refer to the folder labeled: "Q_7". GM is not planning to issue any service, warranty, or other documents within the next 120 days.

DOCUMENT I.D.	DOCUMENT TITLE	ISSUE DATE
DCS1940	Dealer Communication	December 20, 2007
DCS1958	Dealer Communication	January 17, 2008
06074	#06074: Product Safety - Timing Chain Engine Stall	December 2007
06074A	#06074A: Product Safety - Timing Chain Engine Stall	January 2008

TABLE 7: BULLETINS AND OTHER DOCUMENTS

The data collection was completed on January 22, 2009.

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:**
- Action title or identifier;**
 - The actual or planned start date;**
 - The actual or expected end date;**
 - Brief summary of the subject and objective of the action;**
 - Engineering group(s)/supplier(s) responsible for designing and for conducting the action; and**
 - 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.

After GM submitted the response to the NHTSA EA06-009 on April 24, 2007, GM continued to analyze data and conducted a telephone survey with subject vehicle owners regarding the investigation. GM provided this additional information regarding the investigation to the NHTSA in September 2007. Refer to GM's response for EA06-009 - Supplements 1 through 4 for the information.

GM has not performed additional 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. All other information was provided in earlier responses to the investigation.

- 9. State the number of subject components that GM has sold that may be used in the subject vehicles by part number (both service and engineering/production) and month/year of sale (including the cut-off date for sales, if applicable).**

For each component part number, provide the supplier's name, address, and appropriate point of contact (name, title, and telephone number). Also identify by make, model and model year, all vehicle applications that use the component, whether installed in production or in service, and state the applicable dates of production or service usage.

An electronic summary table of the requested service part sales information for the subject components is provided on the Att_1_GM disk; refer to the Microsoft Excel file in the folder labeled "Q_09". The file contains a summary of all part sales. GM does not record the state where the individual components are sold. Additionally, when the subject components are sent to the distribution center, GM is unaware of the final retail destination.

- 12. Describe, and provide copies of all documents relating to, all owner surveys conducted to gather data about the number of timing chain warranty claims that involved engine stall and the circumstances associated with such stalls (e.g., vehicle speed, restart, comments regarding steering and/or braking difficulty, time of day, road and traffic conditions, whether the vehicle stopped in the road or coasted off the road, etc). Please summarize the results of all such surveys in a table and provide the data electronically.**

GM provided information regarding the customer survey for the subject vehicles in response to EA06-009 on July 14, 2006. The information is included in Supplement 3.

- 13. Explain how the scopes of the subject service bulletin and peer vehicle service bulletin were determined and why the bulletins appear to cover vehicles built before and after the subject design changes were implemented in production.**

All vehicles equipped with the L61 engine use the same chain part number. A design change was released for all service and production part usage, and therefore, service bulletins were issued to cover all vehicles using the L61 engine.

14. Provide one sample each of the following:

- a. The timing chain kits identified in the subject and peer vehicle service bulletins; and**
- b. Three samples of broken timing chains from subject vehicle warranty returns.**

GM is providing three new timing chain kits for the subject and peer vehicles in response to question 14a.

GM has initiated a request with the GM Warranty Parts Center (WPC) to retrieve broken timing chains from the subject vehicles. To date, GM has not received any components at the WPC. Components will be forwarded when received by GM.

* * *

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 past and present officers and employees, whether assigned to their principal offices or any of its field or other locations, including all of their 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. Kent', with a stylized flourish extending from the end.

Gay P. Kent
Director

Product Investigations

Attachments