



October 23, 2009

Jeffrey L. Quandt, Chief  
Vehicle Control Division  
Office of Defects Investigation  
National Highway Traffic Safety Administration  
1200 New Jersey Ave., S. E., Room W48-307  
Washington, D.C. 20590

N080326 Supplement 2

NVS-213swmc  
PE08-056

Dear Mr. Quandt:

This letter supplements General Motors' (GM) November 21, 2008, response to your information request (IR), dated September 30, 2008, and GM's Supplement 1 dated February 4, 2009, regarding allegations of inappropriate brake application of one or more wheels induced by an Electronic Stability Control (ESC) system malfunction in model year (MY) 2005 through 2006 Chevrolet Corvette vehicles manufactured by General Motors Corporation.

This letter responds to Stephen McHenry's request that GM provide a second update of our November 21, 2008 response to items 2 through 6 of PE08-056. GM has restated questions 2 through 6 with modifications to reflect that this is the second update GM is providing to items 2 through 6 of PE08-056.

2. **State the number of each of the following, received by GM, or of which GM is otherwise aware since GM's February 4, 2009, Supplement 1 response, which relate to, or may relate to, the alleged defect (including but not limited to DTC code C0710 and its sub codes; Stabilitrak; and the Active Handling System) 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. **Reports involving a fire, based on claims against the manufacturer involving a death or injury, notices received by the manufacturer alleging or proving that a death or injury was caused by a possible defect in a subject vehicle, property damage claims, consumer complaints, or field reports;**
  - e. **Property damage claims; and**

**Product Investigations**

- f. Third-party arbitration proceedings where GM is or was a party to the arbitration; and
- g. Lawsuits, both pending and closed, in which GM is or was a defendant or codefendant.

For subparts “a” through “e” state the total number of each item (e.g., consumer complaints, field reports, etc.) separately. Multiple incidents involving the same vehicle are to be counted separately. Multiple reports of the same incident are also to be counted separately (i.e., a consumer complaint and a field report involving the same incident in which a crash occurred are to be counted as a crash report, a field report and a consumer complaint).

In addition, for items “c” through “g,” provide a summary description of the alleged problem and causal and contributing factors and GM’s assessment of the problem, with a summary of the significant underlying facts and evidence. For items “f” and “g,” identify the parties to the action, as well as the caption, court, docket number, and date on which the complaint or other document initiating the action was filed.

Table 2-1 below summarizes records that may relate to allegations of inappropriate brake application of one or more wheels induced by an Electronic Stability Control (ESC) system malfunction received by or of which GM is otherwise aware since GM’s February 4, 2009 Supplement 1 response. GM has organized the records by the GM file number within each attachment.

TYPE OF REPORT	GM REPORTS	SUBCATEGORIES				
		CORRESPONDING TO NHTSA REPORTS	NUMBER WITH PROPERTY DAMAGE	NUMBER WITH CRASH	NUMBER WITH INJURIES/FATALITIES	NUMBER WITH FIRES*
Owner Reports	1	0	0	0	0	0
Field Reports	4	0	0	0	0	0
Not-In-Suit Claims	0	0	0	0	0	0
Subrogation Claims	0	0	0	0	0	0
Third Party Arbitration Proceedings	0	0	0	0	0	0
Product Liability Lawsuits	0	0	0	0	0	0
Total Reports (Including Duplicates)	5	0	0	0	0	0
Total Vehicles with Reports (Unique VIN)	5	0	0	0	0	0

TABLE 2-1: SUBJECT VEHICLE - MAY RELATE TO ALLEGED CONDITION - REPORT BREAKDOWN

To date, GM's investigation of the alleged defect has not included an assessment of the cause(s) of each incident responsive to Request No. 2. Some incident reports may not contain sufficient reliable information to accurately assess cause.

The sources of the requested information and the last date the searches were conducted are tabulated in Table 2-2 below.

SOURCE SYSTEM	LAST DATE GATHERED
Customer Assistance Center	09/30/09
Technical Assistance Center	10/09/09
Field Information Network Database (FIND)	10/13/09
Field Product Report Database (FPRD)	10/14/09
Company Vehicle Evaluation Program (CVEP)	10/07/09
Captured Test Fleet (CTF)	10/07/09
Early Quality Feedback (EQF)	10/07/09
Legal / Employee Self Insured Services (ESIS)/Product Liability Claims/	10/12/09

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. 1, state the following information:**
  - a. **GM's file number or other identifier used;**
  - b. **The category of the item, as identified in Request No. 1 (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 model year;**
  - f. **Vehicle's mileage at time of incident;**
  - g. **Incident date;**
  - h. **Report or claim date;**
  - i. **Whether a crash is alleged;**
  - j. **Whether a fire is alleged;**
  - k. **Whether property damage is alleged;**
  - l. **Number of alleged injuries, if any; and**
  - m. **Number of alleged fatalities, if any.**

**Provide this information in Microsoft Access 2000, or a compatible format, entitled "REQUEST NUMBER ONE DATA." See Enclosure 1, Data Collection Disc, for a pre-formatted table which 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.” 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 year, a total count for all of the following categories of claims, collectively, that have been paid by GM to date that relate to, or may relate to, the alleged defect (including but not limited to DTC code C0710 and its sub codes; Stabilitrak; the Active Handling System; and all versions of the subject bulletin) 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 received by or of which GM is otherwise aware since GM’s February 4, 2009, Supplement 1 response:**

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. Vehicle’s model year;
- e. Repair date;
- f. Vehicle mileage at time of repair;
- g. Repairing dealers or facility’s name, telephone number, city and state or ZIP code;
- h. Labor operation number;
- i. Problem code;
- j. Replacement part number(s) and description(s);
- k. Concern stated by customer;
- l. Cause and correction as stated by repairing dealer; and
- m. Additional 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.” See Enclosure 1, Data Collection Disc, for a pre-formatted table which provides further details regarding this submission.**

Table 5-1 summarizes by model year the warranty claims and MIC service contract claims for the subject vehicles that may be related to the alleged defect received by or of which GM is otherwise aware since GM’s February 4, 2009, Supplement 1 response. This data was analyzed and sorted into two categories, as shown on the tables, based on review of the labor code descriptions, trouble code descriptions, customer complaint and meaningful information contained in the verbatim of those claims that contained verbatim information.

The definition of the two categories is as follows:

- May be Related – Vehicle may have had inappropriate brake application of one or more wheels induced by an ESC system malfunction.
- Unknown – The warranty claim did not provide enough information to put the claim in the previous category but there was no indication that the vehicle had an inappropriate brake application of one or more wheels induced by an ESC system malfunction.

Model Year	Model	May be Related	Unknown	Total
2005	Chevrolet Corvette	6	12	18
2006	Chevrolet Corvette	4	32	36
Total		10	44	54

TABLE 5-1: SUBJECT VEHICLE REGULAR WARRANTY CLAIMS/MIC SERVICE CONTRACT CLAIMS

A summary of the warranty claims in Table 5-1, including the information requested in 5(a-m), is provided on the Att\_1\_GM disk in the folder labeled “Q\_05,” refer to the Microsoft Access 2000 file labeled, “Q\_05\_TABLE 5-1 WARRANTY DATA.”

GM searched the GM Claims Analytical Reporting Database (CARD) Global Analysis and Reporting Tool (GART – regular warranty), the Motors Insurance Corporation (MIC – service contract claims) and the Universal Warranty Corporation (UWC – service contract claims) databases to collect the warranty data for this response. The warranty data was last gathered on October 12, 2009.

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 – service contract claims database 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.

- 6. Describe in detail the search criteria used by GM to identify the claims identified in response to Request No. 4, including the labor operations, problem codes, part numbers and any other pertinent parameters used. Provide a list of all labor operations, labor operation descriptions, problem codes, and problem code descriptions applicable to the alleged defect in the subject vehicles. State, by 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 and model year, the number of vehicles that are covered under each such extended warranty.**

The criteria used to search for and collect the warranty data for this Supplement 2 response is explained in detail in the November 21, 2008 GM response to item No. 6 of PE08-056. In addition, GM searched the warranty database and MIC service contract database for claims corresponding to each VIN that had a GM report in table 2-1 of this supplement 2 response.

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 additional MIC Service contracts on the subject vehicles that have been sold by MIC since GM's February 4, 2009, Supplement 1 response to PE08-056 regardless of status (in-force, expired, cancelled) is contained in Table 6.

MAKE/MODEL	2005 MY	2006MY	TOTAL
CHEVROLET CORVETTE	411	1151	1562

TABLE 6: SUBJECT VEHICLE MIC SERVICE CONTRACTS SOLD

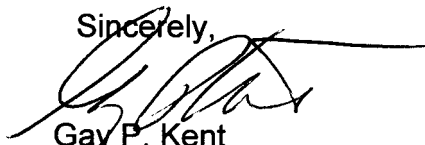
\* \* \*

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 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."

This response was compiled and prepared by this office upon review of the documents produced by various GM locations, and does not include documents generated or received at those GM locations subsequent to their searches.

Please contact me if you require further information about this response or the nature or scope of our searches.

Sincerely,  
  
Gay P. Kent  
Director

Product Investigations and Safety Regulations

Attachments