



GENERAL MOTORS COMPANY
Vehicle Structure & Safety Integration

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John Abbott, Acting Chief
Vehicle Integrity Division
Office of Defects Investigation
National Highway Traffic Safety Administration
1200 New Jersey Ave., S. E., Room W45-202
Washington, D.C. 20590

N090152

NVS-212jfa
PE09-028

Dear Mr. Abbott:

This letter is General Motors' (GM) response to NHTSA preliminary evaluation request (PE), dated March 5, 2009, regarding allegations of gasoline leaking from the fuel pump in 2002 model year (MY) Saturn L Series vehicles manufactured by General Motors Corporation, and to request certain information. As requested, GM is providing information for all (2000 – 2005 MY) Saturn L Series vehicles.

As was agreed upon in a discussion between GM and NHTSA ODI on July 9, 2009, this letter responds to Questions 1-6. In addition, GM is also providing a response to Question 7. GM will submit the responses to Questions 8 through 10 on August 7, 2009.

Your questions and our corresponding replies are as follows:

1. **State the number of all Saturn L Series vehicles GM has manufactured for sale in the United States. Separately, for each vehicle manufactured to date by GM, state the following:**
 - a. **Vehicle identification number (VIN);**
 - b. **Model year**
 - c. **Date of manufacture;**
 - d. **Date warranty coverage commenced; and**
 - e. **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."

Product Investigations

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

MAKE	MODEL	2000MY	2001MY	2002MY	2003MY	2004MY	2005MY	TOTAL
Saturn	L Series	97,411	88,815	96,241	78,085	20,411	6,790	387,753

TABLE 1-1 SUBJECT VEHICLES

The production information requested in 1a-1e is provided on the disk in Attachment 1, in the folder labeled "Q_01"; refer to the Microsoft Access 2000 file labeled "Q_01PRODUCTION DATA". The GM database that contains Vehicle Identification Number (VIN) information does not include information on the state where an individual vehicle was sold. GM is providing the state where the vehicle was shipped in response to request 1e. 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. Your response should also include information relating to all other MY Saturn L series vehicles:**
 - a. **Consumer complaints;**
 - 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 the alleged defect in a subject vehicle, property damage claims, consumer complaints, or field reports;**
 - d. **Third-party arbitration proceedings where GM is or was a party to the arbitration; and,**
 - e. **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, reports from retailers, etc.) separately. Multiple incidents involving the same vehicles 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 item "c" 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 "d" and "e," 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 summarizes records that may be related to leaks of the Modular Reservoir Assemblies (MRAs) where the customer reported a fuel odor or leak.

GM is also providing additional reports that are related to the subject components and the alleged condition in the subject vehicles. During the review of these reports, GM found that many of the technician comments state that the MRA inlet/outlet pipes were cracked (by the technician) during service of the MRA or fuel level sensor. In all these reports, the MRA unit was replaced. Additionally, GM found reports where the customer stated a service engine soon (SES) light was illuminated and a diagnostic trouble code was stored in the powertrain control module (PCM). In these cases, it was determined that a vapor leak was related to the o-ring seal for the MRA assembly.

GM has summarized these additional records into two groups: Table 2-2: Cracks associated with the MRA that were identified and/or created during service/removal of the fuel system components (example - fuel level sensor repairs), where no odor or leak was reported by the customer; and Table 2-3: Fuel system vapor leaks associated with the MRA o-ring seal (identified by a SES light and no odor or leak reported by the customer).

GM has organized the records by the GM file number within each attachment. Refer to access database "Q_03_REQUEST NUMBER TWO DATA" for categories prescribed by the NHTSA.

TYPE OF REPORT	GM REPORTS	SUBCATEGORIES			
		CORRESPONDING TO NHTSA REPORTS	NUMBER WITH PROPERTY DAMAGE	NUMBER WITH CRASH	NUMBER WITH INJURIES/ FATALITIES
Owner Reports	28	2	0	0	0
Field Reports	3	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)	31	2	0	0	0
Total Vehicles with Reports (Unique VIN)	31	2	0	0	0

TABLE 2-1 GM REPORTS – MRA LEAK/ODOR REPORTED BY CUSTOMER

TYPE OF REPORT	GM REPORTS	SUBCATEGORIES			
		CORRESPONDING TO NHTSA REPORTS	NUMBER WITH PROPERTY DAMAGE	NUMBER WITH CRASH	NUMBER WITH INJURIES/ FATALITIES
Owner Reports	4	0	0	0	0
Field Reports	3	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)	7	0	0	0	0
Total Vehicles with Reports (Unique VIN)	7	0	0	0	0

TABLE 2-2 GM REPORTS – MRA CRACK/LEAK IDENTIFIED AND/OR CREATED DURING SERVICE
(NO FUEL LEAK OR ODOR REPORTED BY THE CUSTOMER)

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

TABLE 2-3 GM REPORTS – MRA O-RING SERVICED
(NO FUEL LEAK OR ODOR REPORTED BY THE CUSTOMER)

The sources of the requested information and the last date the searches were conducted are tabulated in Table 2-4 below.

SOURCE SYSTEM	LAST DATE GATHERED
Customer Assistance Center	June 8, 2009
Technical Assistance Center	June 18, 2009
Field Information Network Database (FIND)	June 24, 2009
Field Product Report Database (FPRD)	June 8, 2009
Company Vehicle Evaluation Program (CVEP)	June 8, 2009
Captured Test Fleet (CTF)	June 8, 2009
Early Quality Feedback (EQF)	June 8, 2009
Legal / Employee Self Insured Services (ESIS)/Product Liability Claims/ Lawsuits	June 17, 2009

TABLE 2-4: DATA SOURCES

3. Separately, for each item (complaint, report, claim, notice, or matter) within the scope of your response to Request No. 2, state the following information:
 - a. GM's file number or other identifier used;
 - b. The category of the item, as identified in Request No. 2 (i.e., consumer complaint, report from retailer, etc.);
 - c. Vehicle owner's name, address, and telephone number;
 - d. Vehicle identification number (VIN);

- e. Model year;
- f. Vehicle date of manufacture;
- g. Incident date;
- h. Report or claim date;
- i. Number of alleged fires;
- j. Number of alleged injuries; and
- k. Number of alleged fatalities.

Provide this information in Microsoft Access 2000, or a compatible format, entitled "REQUEST NUMBER TWO DATA."

The requested information is provided on the Att_1_GM disk in the folder labeled "Q_03"; refer to the Microsoft Access 2000 file labeled, "Q_03_REQUEST NUMBER TWO DATA".

- 4. Produce copies of all documents related to each item within the scope of Request No. 2. Organize the documents separately by category (i.e., consumer complaints, reports from retailers, etc.) and describe the method GM used for organizing the documents.**

Copies of the records summarized in Tables 2-1 through 2-3 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 a total count for all of the following categories of claims, collectively, that have been paid by GM that relate to, or may relate to, the alleged defect in the subject vehicles and all other MY Saturn L series vehicles. Your response should also include information relating to all other MY Saturn L series vehicles: warranty claims; extended warranty claims; claims for good will services that were provided; 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's name and telephone number;
- c. Vehicle identification number (VIN);
- d. Model Year
- e. Vehicle date of manufacture;

- f. Repair date;**
- g. Repairing 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; and**
- l. Comment, if any, by the technician or person(s) making the repair, and/or the person(s) processing the claim that relate to the claim and/or repair.**

Provide this information in Microsoft Access 2000, or a compatible format, entitle "WARRANTY DATA."

Regular Warranty

GM searched the GM Claims Analytical Reporting Database (CARD) regular warranty using the four labor codes listed in Table 6-1. GM reviewed the claim verbatim, customer and trouble codes for key words/characters including: leak, odor, smell, fumes, broke, crack, inlet, outlet, nipple, brittle, SES and stain. Table 5-1 summarizes records that may be related to leaks of the MRAs where the customer reported a fuel odor or leak.

GM is also providing additional claims that are related to the subject components and the alleged condition in the subject vehicles. During the review of these claims, GM found that many of the comments state that the MRA inlet/outlet pipes were cracked (by the technician) during service of the MRA or fuel level sensor. In all these claims, the MRA unit was replaced. Additionally, GM found claims where the customer stated a SES light was illuminated and a diagnostic trouble code was stored in the PCM. In these cases, it was determined that a vapor leak was related to the o-ring seal for the MRA assembly.

GM has summarized these additional claims into two groups: Table 5-2: Cracks associated with the MRA that were identified and/or created during service/removal of the fuel system components (example - fuel level sensor repairs), where no odor or leak was reported by the customer; and Table 5-3: Fuel system vapor leaks associated with the MRA o-ring seal (identified by a SES light and no odor or leak reported by the customer).

In Tables 5-1 through 5-3, GM states the number of regular warranty claims for the subject vehicles as described above.

MAKE	MODEL	2000MY	2001MY	2002MY	2003MY	2004MY	2005MY	TOTAL
Saturn	L Series	15	93	91	24	4	0	227

TABLE 5-1 REGULAR WARRANTY CLAIMS – SUBJECT VEHICLE: MRA LEAK/ODOR REPORTED BY CUSTOMER

MAKE	MODEL	2000MY	2001MY	2002MY	2003MY	2004MY	2005MY	TOTAL
Saturn	L Series	10	395	193	60	26	2	686

TABLE 5-2 REGULAR WARRANTY CLAIMS – MRA CRACK/LEAK IDENTIFIED AND/OR CREATED DURING SERVICE
(NO FUEL LEAK OR ODOR REPORTED BY THE CUSTOMER)

MAKE	MODEL	2000MY	2001MY	2002MY	2003MY	2004MY	2005MY	TOTAL
Saturn	L Series	21	12	8	15	13	5	74

TABLE 5-3 REGULAR WARRANTY CLAIMS – MRA O-RING SERVICED
(NO FUEL LEAK OR ODOR REPORTED BY THE CUSTOMER)

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

The MIC extended service contract claim database was searched using the four labor codes listed in Table 6-1. The UWC extended service contract claims database was searched using the nine loss codes listed in Table 6-2. GM reviewed the extended service contract verbatims, customer and trouble codes for key words/characters including: leak, odor, smell, fumes, broke, crack, inlet, outlet, nipple, brittle, SES and stain. Table 5-4 summarizes records that may be related to leaks of the MRAs where the customer reported a fuel odor or leak.

GM is also providing additional extended service contract claims that are related to the subject components and the alleged condition in the subject vehicles. During the review of these records, GM found that many of the comments state that the MRA inlet/outlet pipes were cracked (by the technician) during service of the MRA or fuel level sensor. In all these claims, the MRA unit was replaced. Additionally, GM found claims where the customer stated a SES light was illuminated and a diagnostic trouble code was stored in the PCM. In these cases, it was determined that a vapor leak was related to the o-ring seal for the MRA assembly.

GM has summarized these additional extended service contract claims into two groups: Table 5-5: Cracks associated with the MRA that were identified and/or created during service/removal of the fuel system components (example - fuel level sensor repairs), where no odor or leak was reported by the customer; and Table 5-6: Fuel system vapor leaks associated with the MRA o-ring seal (identified by a SES light and no odor or leak reported by the customer).

MAKE	MODEL	2000MY	2001MY	2002MY	2003MY	2004MY	2005MY	TOTAL
Saturn	L Series	2	50	101	43	11	1	208

TABLE 5-4 MIC AND UWC EXTENDED SERVICE CONTRACT CLAIMS – SUBJECT VEHICLE: LEAK/ODOR REPORTED BY CUSTOMER

MAKE	MODEL	2000MY	2001MY	2002MY	2003MY	2004MY	2005MY	TOTAL
Saturn	L Series	2	27	19	6	0	0	54

TABLE 5-5 MIC AND UWC EXTENDED SERVICE CONTRACT CLAIMS – MRA CRACK/LEAK IDENTIFIED AND/OR CREATED DURING SERVICE (NO FUEL LEAK OR ODOR REPORTED BY THE CUSTOMER)

MAKE	MODEL	2000MY	2001MY	2002MY	2003MY	2004MY	2005MY	TOTAL
Saturn	L Series	2	2	4	0	1	0	9

TABLE 5-6 MIC AND UWC EXTENDED SERVICE CONTRACT CLAIMS – MRA O-RING SERVICED (NO FUEL LEAK OR ODOR REPORTED BY THE CUSTOMER)

The MIC Service Contract Claim system does not contain the vehicle owner information. The 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 regular warranty, MIC and UWC extended service contract claims for Tables 5-1 through 5-6 (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 5-7 below.

SOURCE SYSTEM	LAST DATE GATHERED
GM CARD –regular warranty	6/10/2009
Motors Insurance Corporation (MIC) – extended service contract	6/9/2009
Universal Warranty Corporation (UWC) – extended service contract	6/15/2009

TABLE 5-7: 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 and all other MY Saturn L series vehicles. State the terms of the new vehicle warranty coverage offered by GM on the subject vehicles (i.e., the number of months for which coverage is provided and the vehicles systems that are covered). Describe any extended warranty coverage option(s) related to the alleged defect 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.

GM searched the GM CARD regular warranty and the MIC service contract claim database using the four labor codes listed in Table 6-1. GM then reviewed the verbatims for these claims using key words/characters including: leak, odor, smell, fumes, crack, broke, inlet, outlet, nipple, brittle, SES and stain.

LABOR CODE	DESCRIPTION:
J5590	Fuel Pump Replacement
L1200	Fuel Tank Fuel Pump Module Replacement
Z1241	Product Liability/Investigation REP PR (Goodwill)
Z1242	PAR – Repairs/Reimbursement (Goodwill)

TABLE 6-1 LABOR CODES USED IN WARRANTY SEARCH

The UWC extended service contract claims database was searched using the nine loss codes listed in Table 6-2 below. GM reviewed the extended service contract verbatims for key words/characters including: leak, odor, smell, fumes, crack, broke, inlet, outlet, nipple, brittle, SES and stain.

Loss Code	DESCRIPTION:
1000	Fuel Pump
1015	Fuel Tank
1020	Fuel Tank Sending Unit
1098	Misc. Fuel Components
1098A	Fuel Level Sensor
1098B	Fuel Pressure Regulator
1098C	Fuel Pump Relay
1098D	Fuel Pump Resistor
1098E	Fuel Pump Seal

TABLE 6-2 LOSS CODES USED IN UWC EXTENDED SERVICE CONTRACT SEARCH

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 June 9, 2009 is contained in Tables 6-3 and 6-4.

MAKE/MODEL	2000MY	2001MY	2002MY	2003MY	2004MY	2005MY	TOTAL
Saturn L-Series	37,898	30,887	34,307	25,338	6,546	1,990	136,966

TABLE 6-3 MIC EXTENDED SERVICE CONTRACTS SOLD

MAKE/MODEL	2000MY	2001MY	2002MY	2003MY	2004MY	2005MY	TOTAL
Saturn L-Series	283	495	493	488	106	36	1,841

TABLE 6-4 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, and all other MY Saturn L series vehicles, that GM has issued to any retailers or distributors, regional or zone offices, field offices, or other such 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.**

To date, GM has not identified any service bulletins that relate to the alleged condition in the subject vehicles.

* * * *

This response is based on searches of General Motors Corporation and General Motors Company 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 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 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

Attachment