

June 16, 2010

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

PE09-032 Update

NVS-213kmb
N090188

Dear Mr. Quandt:

This letter is Saab Cars North America's (Saab) response to your closing resume, dated December 16, 2009, regarding allegations of engine compartment fire originating at or near the ignition coils in certain model year (MY) 2007 Saab 9-3 Aero vehicles equipped with the 2.8L V6 Turbo (LP9) engine manufactured by GM. As communicated to NHTSA in a letter to Mr. David Strickland on May 12, 2010, GM recently sold 100% of its ownership in Saab Automobile AB (Saab) to Spyker Cars NV (Spyker). As a result, Saab is providing this response.

This response includes all additional complaint and warranty information that has not previously been reported to NHTSA since GM's response to PE09-032 submitted on September 18, 2009. In the closing resume, your office requested an update of complaint and warranty information 6 months from the date of the closing resume. For this response Saab found no additional reports or claims not previously reported to NHTSA, in which there were indications of a fire or flame. Saab is including three warranty claims with allegations of non-fire thermal events defined as smoke/odor/melting originating in the ignition coil. These three claims are consistent with GM's September 18, 2009 response to PE09-032 in that the 'Check Engine' light was illuminated and it prompted the customer to bring the vehicle into the dealership for service for each of the claims. Two of these customers also complained of poor engine performance or rough running. All three of these cases of smoke/odor/melting were attended and were confined to coil or its adjacent wiring.

Saab is providing an update to GM's response to questions 2, 5 and 6 from PE09-032 submitted September 18, 2009. These questions and our corresponding replies are as follows:

- 2. State the number of each of the following, received by GM, or of which GM is otherwise aware, which relate to, or may relate to, the alleged defect in the subject vehicles:**

- a. Consumer complaints, including those from fleet operators;**
- b. Field reports, including dealer field reports;**
- c. Reports involving a 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;**
- d. Property damage claims;**
- e. Third-party arbitration proceedings where GM is or was a party to the arbitration; and**
- f. Lawsuits, both pending and closed, in which GM is or was a defendant or codefendant.**

For subparts “a” through “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). For items “e” and “f,” identify the parties to the action, as well as the caption, court, docket number, and date on which the complaint or other document initiating the action was filed.

There were no reports that may relate to allegations of engine compartment fire originating at or near the ignition coils or containing information indicating smoke/odor/ melting originating at or near the ignition coil.

- 5. State, by model and 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 the subject component in the subject vehicles: warranty claims; extended warranty claims; claims for good will services that were provided; field, zone, or similar adjustments and reimbursements; and warranty claims or repairs made in accordance with a procedure specified in a technical service bulletin or customer satisfaction campaign.**

Separately, for each such claim, state the following information:

- a. GM’s claim number;**
- b. Vehicle owner or fleet name (and fleet contact person) and telephone number;**
- c. VIN;**
- d. Repair date;**
- e. Vehicle mileage at time of repair;**

- f. Repairing dealer's or facility's name, telephone number, city and state or ZIP code;**
 - g. Labor operation number;**
 - h. Problem code;**
 - i. Replacement part number(s) and description(s);**
 - j. Concern stated by customer; and**
 - k. Comment, if any, by dealer/technician relating to claim and/or repair.**
- Provide this information in Microsoft Access 2000, or a compatible format, entitled "WARRANTY DATA." See Enclosure 1, Data Collection Disc, for a pre-formatted table which provides further details regarding this submission.**

There were no regular warranty claims with allegations of engine compartment fire originating at or near the ignition coils on the subject vehicles. The regular warranty claims with allegations of smoke/odor/melting originating at or near the ignition coil are summarized in Table 5-1. There were no goodwill warranty claims, MIC or UWC service contract claims with allegations of engine compartment fire or smoke/odor/melting originating at or near the ignition coils. A summary of the warranty claims, including the information requested in 5(a-k), is provided on the ATT_1_Saab disk; folder labeled "Q_05". Refer to the Microsoft Access 2000 file labeled "Q_05_WARRANTY DATA". A list of the labor codes, customer complaint codes and trouble codes used to collect the warranty data is provided in response to item No. 6.

MAKE/ MODEL	Type	2007 MY
Saab 9-3 Aero	Regular	3

TABLE 5-1: REGULAR WARRANTY CLAIMS WITH ALLEGATIONS OF SMOKE/ODOR/MELTING ORIGINATING AT OR NEAR THE IGNITION COIL

Source System	Last Date Gathered
Saab Cars USA - regular warranty	June 11, 2010
MIC - service contract claims	May 27, 2010
UWC - service contract claims	June 6, 2010

TABLE 5-2: LAST DATES GATHERED

Saab searched the Saab Cars USA, Inc. warranty database, 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 Saab Cars USA, Inc. warranty databases do not contain the following information: vehicle owner's name or telephone number, replacement part

number description or customer concern statement. Saab is providing a field labeled "Verbatim Text" in response to request 5K (dealer/technician comment) when included in the warranty claim.

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.

A summary of warranty claims that may relate to the subject condition is provided on the ATT_1_Saab disk; folder labeled "Q_05". Refer to the Microsoft Access 2000 file labeled "Q_05_WARRANTY DATA".

- 6. Describe in detail the search criteria used by GM to identify the claims identified in response to Request No. 5, including the labor operations, problem codes, part numbers and any other pertinent parameters used. Provide a list of all labor operations, labor operation descriptions, problem codes, and problem code descriptions applicable to the alleged defect in the subject vehicles. State, by make and model year, the terms of the new vehicle warranty coverage offered by GM on the subject vehicles (i.e., the number of months and mileage for which coverage is provided and the vehicle systems that are covered). Describe any extended warranty coverage option(s) that GM offered for the subject vehicles and state by option, model, and model year, the number of vehicles that are covered under each such extended warranty.**

The GM Global Analysis and Reporting Tool (GART-regular warranty) regular warranty database, the Saab Cars USA, Inc. warranty database and the Motors Insurance Corp (MIC) service contract claims database were searched using the labor codes listed in Table 6-1 and part numbers listed in table 6-2, that may be related to the alleged defect.

All of the claims included a customer, analysis and solution verbatim. All of the verbatim comments for these claims were read and used to sort the warranty data. Using these warranty claim verbatim, Saab was able to identify claims of engine compartment fire originating at or near the ignition coils and smoke/odor/melting originating at or near the ignition coil. Universal Warranty Corporation (UWC) does not use labor codes or trouble codes.

LABOR CODE	DESCRIPTION:
34111-1	IGNITION COIL-REPLACE DETAIL
34111-2	IGNITION COIL
34111-3	IGNITION COIL
34111-5	IGNITION COIL-ADJUST
34111-6	IGNITION COIL-REPLACE COMPLETE UNIT
34111-8	IGNITION COIL-CHECK TROUBLESHOOT
34111-10	IGNITION COIL
J4340	IGNITION COIL REPLACEMENT
J4345	COIL, ELECTRONIC IGNITION CONTROL (DIS/3CI) - REPLACE
Z1241	PRODUCT LIABILITY/INVESTIGATION REP PR (GOODWILL)
Z1242	PAR-REPAIRS/REIMBURSEMENT (GOODWILL)
Z1243	INSPECTION-PRODUCT ALLEGATION RESOLUTION

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

PART NUMBER	DESCRIPTION:
12583514	IGNITION COIL
12613057	IGNITION COIL
12629037	IGNITION COIL

TABLE 6-2 PART NUMBERS USED IN WARRANTY AND MIC SEARCH

The subject components are covered by a drivetrain warranty for five years or 100,000 miles, whichever occurs first. Many different extended warranty

options are available through Saab 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 number of extended service contracts on the subject vehicles that have been sold by MIC as of July 29, 2009 and UWC as of September 13, 2009 regardless of status (in-force, expired, cancelled) is contained in Tables 6-3 and 6-4.

MAKE	MODEL	2007
Saab	9-3 Aero	134

TABLE 6-3: MIC EXTENDED SERVICE COVERAGE CONTRACTS SOLD

MAKE	MODEL	2007
Saab	9-3 Aero	52

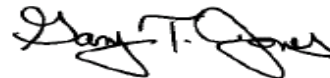
TABLE 6-4: UWC EXTENDED SERVICE COVERAGE CONTRACTS SOLD

In conclusion, the results of this update are consistent with the summary submitted in GM's response to PE09-032 submitted on September 18 2009:

- 1) The predominant failure mode is a crack in the capacitor on a circuit board in the top of the coil which produced smoke/odor/melting in 83% of the reports and claims.
- 2) In most cases of smoke/odor/melting there was warning to the customer via a diagnostic light and rough engine operation.
- 3) The rare incidents of reported fires occurred early in the life of the vehicle and the future risk of fire is minimal.
- 4) All incidents of both smoke/odor/melting and of fire have been attended and have been confined to the front of the engine compartment. There are no reports of death or injury and there are no VOQs for this subject issue.

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

Sincerely,



Gary T. Jones
Compliance Manager
Saab Cars North America, Inc.

Attachments