



March 16, 2010

D. Scott Yon, Chief
Vehicle Integrity Division
Office of Defects Investigation
National Highway Traffic Safety Administration
1200 New Jersey Ave., S. E., Room W48-312
Washington, D.C. 20590

PE09-048
N090273 Supplement 1

Dear Mr. Yon:

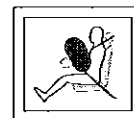
This letter is General Motors' (GM) voluntary submission in response to a NHTSA e-mail from Larry Hershman, dated January 22, 2010, requesting certain information and an update of information provided in response to NHTSA letter PE09-048, including GM's customer survey regarding allegations of seat belt retractor failure on MY 2004 Saab 9-3 vehicles manufactured for sale or lease in the United States. The information is included on the electronic disks identified as: ATT_1_GM and ATT_2_Takata_CONF.

Takata-Petri is independently seeking confidentiality for certain information provided in this response. A letter from Takata-Petri requesting confidential treatment for certain documents they have provided is on the Att_2_Takata_CONF disk along with the Takata-Petri documents for which they are requesting confidentiality.

Your questions and our corresponding replies are as follows:

- 1. The document I had trouble following up is on the GM confidential disk [D:\ATT_2_GM_CONF\Q_08\8-1 Specs & Valid\Sub-Sys TechSpec\ Q_08_SSTS Test Report]. It is the Verification report Seat Belt System 440, dated December 20, 2004, and refers to deviations that include 3.7.2.1.1.1a-b Retractor tensile strength. I'd appreciate any further information you could provide to explain and shed light on that deviation. The document located next to that report on that disk (D:\ATT_2_GM_CONF\Q_08\8-1 Specs & Valid\Sub-Sys TechSpec\ Q_08_S44036002), Subsystem Technical Specification 44X-360 Seat Belt System, appears to spell out the specifications, but I cannot find section 3.7.2.1.1.1a-b, though I do find section 3.7.3.1.1.1 Retractor Tensile Strength;**

As stated in a telephone conversation, GM found that a typographical error existed on the SSTS Report described above. Section 3.7.2.1.1.1a-b is actually



section 3.7.3.1.1 in the ATT_2_GM_CONF\Q_08\8-1 Specs & Valid\Sub-Sys TechSpec\ Q_08_S44036002 file.

- 2. The Takata-Petri power point from September 16, 2003 with pages 9-13 missing is Q_08_Saab ATS Pres-16.09.03 from attachment 3 containing the Takata confidential information**

GM is including the complete Takata-Petri file: SCAN4529_000 Takat Pres w missing pages.pdf that includes pages 9-13 of the presentation. The updated file is located on the Att_2_Takata_CONF disk included with this letter.

- 3. Please provide a detailed description of the survey you conducted, including the questions/script used.**

GM is including a copy of the survey script with this letter along with explanation of the survey population and results. The files: PE09-048 Survey Population.docx and Saab 9-3 Script v1.2.xls are located on the Att_1_GM disk included with this letter.

- 4. Please provide a detailed breakdown of the survey results, including results broken down by sedan vs. convertible, driver's seat vs. passenger seat, and time in service before failure (preferably, from date of sale, but if not, then from date of vehicle manufacture)**

GM is including an updated copy of the warranty data submitted with the response to Question 5 of the PE09-048. The file: PE09-048 Warranty 2_2010.xlsx includes additional information added to the warranty claims including: Survey Results (ATS or Retracts Improperly) and Failed Belt LH, RH. Both records are located on the disk included with this letter. The vehicle type: sedan vs. convertible can be determined by comparing VINs from the population data provided in response to the NHTSA letter PE09-048. GM is also including the projected failure rates of the front passenger seat belt retractors. The files: PE09-048 Warranty 2_2010.xlsx and 2004 Saab 9-3 Passenger Retractor Replace Projection.ppt is located on the Att_1_GM disk included with this letter.

- 5. The results gathered to date of the examinations and testing of returned and same vintage retractors (including by Takata, Saab, GM, etc.)**

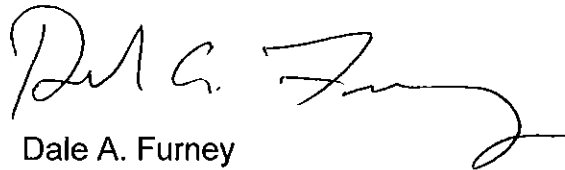
GM is including a file that contains information regarding durability testing of seat belt retractors with ATS. The file: ATS Durability Cycling Status_20100203.pdf is located on the Att_2_Takata_CONF disk included with this letter.

6. Information regarding life cycle testing of seat belt retractors

This information was included with the response to PE09-048. Please see page 49 and 50 of the file: Q_08_S44036002.pdf located on the ATT_2_GM_CONF disk in the Q_08\8-1 Specs\& Valid\Sub-Sys TechSpec folder. Section 3.7.3.1.18 describes the expected life cycles for the retractor and the test requirements.

Please contact me if you require further information about this response.

Sincerely,

A handwritten signature in black ink, appearing to read "Dale A. Furney". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Dale A. Furney
Engineering Group Manager
Product Investigations

Attachment

PE09-048

3/16/2010

ATTACHMENT 1

Survey Population

Project: 2004 Saab 9-3 Sedan Front Seat Retractor Replacement Survey

Objective: Contact as many of the 1,186 sedan customers having a warranty claim listed in tables 5-1 and 5-2 of the response to PE09-048.

Table 5-1 203 claims

Table 5-2 983 claims

Due to privacy restrictions and incorrect / cancelled phone numbers, we were only able to get 403 phone numbers. Of those, 95 customers were reached who agreed to be surveyed.

ATS - 68 or 72% (duplicate VINs excluded) of the customers indicated the belt was replaced due to ATS cable separation.

Retracts Improperly - 27 or 28% (duplicate VINs excluded) of the customers indicated the belt was replaced because it was "sluggish".

PE09-048

3/16/2010

ATTACHMENT 1

2004 Saab 9-3

Passenger

Retractor Replace

Projection

2004 Saab 9-3 Front Passenger Belt Retraction Claims by MIS

