



GENERAL MOTORS LLC
Global Interior and Safety Center

GM Reply Date: January 14, 2011

N100401 Book 1 of 1

NHTSA # AQ10-001 NHTSA Requesting Engineer #1

Non-Confidential

General Motors (GM) response to your audit query (AQ), dated November 18, 2010, to investigate recall remedy completion by rental car fleets on certain safety and non-compliance recall campaigns that General Motors has conducted.

- Tab (1).....NHTSA Letter
- Tab (2).....GM Response Letter to NHTSA
- Tab (3)..... Attachment 1 Material (ATT_1_GM) CD
- Tab (4)..... Miscellaneous



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

NOV 18 2010

1200 New Jersey Avenue SE
Washington, DC 20590

Via USPS Certified Mail and E-mail

Ms. Carmen Benavides
Director, Product Investigations
And Safety Regulations
General Motors LLC
Mail Code: 480-210-2V1
30001 Van Dyke Road
Warren, MI 48090-9020

NVS-215jt
AQ10-001
09V-073
09V-392
10V-018
10V-024

Re: Audit of Rental Car Safety Recall Campaign Completion

Dear Ms. Benavides:

The agency, particularly in recent months, has been informed of incidents involving allegations of vehicle crashes, personal injury, and fatalities claimed to have been caused by safety defects and failures to conform to minimum Federal Motor Vehicle Safety Standards (FMVSS) on rental car vehicles for which a safety recall to remedy the safety defect or noncompliance had allegedly not been performed prior to the rental car company's lease of the vehicle. NHTSA understands that there is presently a petition before the Federal Trade Commission (FTC) seeking to prohibit at least one rental car company from renting vehicles on which safety recall campaign remedies remain outstanding.

NHTSA is troubled by these allegations and is conducting an audit of various recalls involving rental car vehicles in order to evaluate the completion of safety recall remedies on rental cars. Accordingly, the Recall Management Division (RMD) has opened an audit query (AQ) to investigate recall remedy completion by rental car fleets on certain safety recall campaigns General Motors LLC (GM) has conducted. In its capacity as the vehicle manufacturer responsible for conducting those recall campaigns, maintaining lists of all owners and purchasers notified, and for collecting and then reporting campaign completion figures to the agency, we are requesting GM supply certain information on the campaigns.

The safety recall campaigns subject to this investigation and this request for information include: 09V-073 Shift Lever Indicator/FMVSS 102 & FMVSS 114, 09V-392 Brake Vacuum Suction Port, 10V-018 Sticking Accelerator Pedal, and 10V-024 Pedal Entrapment.



DEFINITIONS

1. "GM" means General Motors LLC, including all of its divisions, subsidiaries and affiliated enterprises and its 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).

2. The term "you" or "your" refers to GM.

3. The term "rental car company" refers to any business operation engaged in the business of renting or leasing passenger cars or multipurpose passenger vehicles to other persons for shorter-term use (e.g., less than 90 days). Unless otherwise specified, this term means a single company and not a conglomeration or affiliation of rental car companies that may share ownership or be owned or controlled by another entity. The term "rental car conglomeration" means a conglomeration or affiliation of more than one rental car company.

4. The term "person" includes natural persons, proprietorships, partnerships, firms, corporations, federal, state, and local governments, all departments and agencies thereof, and any other governmental agencies, political subdivisions, groups, associations, or organizations, whether located in the United States or abroad.

5. The term "subject recalls" means those safety recall campaigns involved in this investigation.

6. The term "campaigned vehicle" means a vehicle covered by a subject recall.

7. The term "disposal date" means the date the rental car company identified or reported to GM, or to a state motor vehicle administration or other state vehicle registration administration who then either reported to GM or GM learned from that administration either directly or through a vendor engaged in the business of collecting vehicle registration information, as the date it relinquished ownership of a campaigned vehicle. In the event GM has information indicating more than one disposal date for a vehicle, the earliest of the dates should be identified and considered as the disposal date.

8. The terms "recall campaign launch date" or "launch date" means the date GM issued its notifications compliant with 49 CFR Part 577 to owners and purchasers (including rental car companies) concerning the safety defect or noncompliance with Federal Motor Vehicle Safety Standards (FMVSS) at issue in a given subject recall and applicable to those companies' vehicles.

9. The term "recall campaign launch count" or "launch count" means the number of campaigned vehicles on the recall campaign launch date.

10. The term "count at 30 days" means the number of campaigned vehicles 30 days after the recall campaign launch date. Similarly the terms "count at 60 days," "count at 90 days," "count at 120 days," and "count at 365 days," correlate to the number of campaigned vehicles at that date and point in time relative to the launch date. Should GM have information that establishes a vehicle's disposal date between a given range of counts of days (e.g., vehicle sale or

registration records establish a rental car company relinquished ownership sometime between 30 and 60 days post-launch date), then GM may, at its discretion, remove that vehicle from the latter count's total. Note that this does not pertain to vehicles for which 30 days or less has accrued from launch date. If GM chooses to exercise this discretion, it must exercise the same discretion for all vehicles that fall between count dates. It must also advise the agency prominently in its response that it is exercising this discretion.

11. The term "number remedied" means the number of campaigned vehicles that either the rental car company reported to GM, or GM deduced from its own records, that had been inspected and remedied, inspected and identified as not requiring a remedy, or otherwise having had the subject recall's remedy applied.

12. The term "number remedied at 30 days" means the number of campaigned vehicles that either the rental car company reported to GM, or GM deduced from its own records, that had been inspected and remedied, inspected and identified as not requiring a remedy, or otherwise having had the subject recall's remedy applied, 30 days after the recall campaign launch date. Similarly the terms "number remedied at 60 days," "number remedied at 90 days," "number remedied at 120 days," and "number remedied at 365 days," correlate to the number of campaigned vehicles that had been remedied at that date and point in time relative to the launch date.

13. The term "percentage remedied" means the percentage of campaigned vehicles that either the rental car company reported to GM, or GM deduced from its own records, that had been inspected and remedied, inspected and identified as not requiring a remedy, or otherwise having had the subject recall's remedy applied.

14. The term "percentage remedied at 30 days" means the percentage of campaigned vehicles that either the rental car company reported to GM, or GM deduced from its own records, that had been inspected and remedied, inspected and identified as not requiring a remedy, or otherwise having had the subject recall's remedy applied, 30 days after the recall campaign launch date. Similarly the terms "percentage remedied at 60 days," "percentage remedied at 90 days," "percentage remedied at 120 days," and "percentage remedied at 365 days," correlate to the of campaigned vehicles that had been remedied at that date and point in time relative to the launch date.

15. The term "top ten rental car companies" means the ten rental car companies that had the most campaigned vehicles at the launch date of a subject recall. For the purposes of this information request, if a rental car company had less than 25 campaigned vehicles at a subject recall's launch date, that company's recall completion information need not be provided in response to a request. Note that this does exception does not include companies that may have had less than 25 campaigned vehicles at some point after the launch date.

16. To "identify" or "state the identity of" a rental car company or a rental car conglomeration means to state its full name and the present or last known address and telephone number of its headquarters. Once a rental car company or conglomeration has been so identified, it may thereafter be identified by name alone or by an abbreviation.

REQUESTS

1. Separately for each subject recall, provide a table with the following information:
 - a. The recall's launch date;
 - b. The top ten rental car companies; and then, for each company:
 - i. Its launch count;
 - ii. Its count at 30 days;
 - iii. Number of vehicles remedied at 30 days;
 - iv. Percentage of vehicles remedied at 30 days;
 - v. Its count at 60 days;
 - vi. Number of vehicles remedied at 60 days;
 - vii. Percentage of vehicles remedied at 60 days;
 - viii. Its count at 90 days;
 - ix. Number of vehicles remedied at 90 days;
 - x. Percentage of vehicles remedied at 90 days;
 - xi. Its count at 120 days;
 - xii. Number of vehicles remedied at 120 days;
 - xiii. Percentage of vehicles remedied at 120 days;
 - xiv. Count at 365 days;
 - xv. Number of vehicles remedied at 365 days; and
 - xvi. Percentage of vehicles remedied at 365 days

Conspicuously identify the subject recall's NHTSA assigned identification number on each table and name each table "Rental Car Completion Analysis for [insert NHTSA identification number as applicable]." Provide the tables in Microsoft Access or Microsoft Excel format.

In the event GM expanded the scope of the campaigned vehicles in any significant manner during the course of a campaign, (e.g., expansions GM would have notified the agency concerning, and not minor changes due to entry and departure of vehicles in and out of the country, as one example) state when it changed the population, and provide a separate aggregation of data for the changed population.

2. Separately, for each subject recall, provide a table with the following information as it relates to all other vehicles covered by the subject recall exclusive of the rental car campaigned vehicles:
 - a. The recall's launch date;
 - b. The total vehicles at launch;
 - c. Number of vehicles remedied at 30 days;
 - d. Percentage of vehicles remedied at 30 days;
 - e. Number of vehicles remedied at 60 days;
 - f. Percentage of vehicles remedied at 60 days;
 - g. Number of vehicles remedied at 90 days;

- h. Percentage of vehicles remedied at 90 days;
- i. Number of vehicles remedied at 120 days;
- m. Percentage of vehicles remedied at 120 days;
- n. Number of vehicles remedied at 365 days; and
- o. Percentage of vehicles remedied at 365 days

Conspicuously identify the subject recall's NHTSA assigned identification number on each table and name each table "Non-Rental Completion Analysis for [insert NHTSA identification number as applicable]." Provide the tables in Microsoft Access or Microsoft Excel format.

In the event GM expanded the scope of the campaigned vehicles in any significant manner during the course of a campaign, (e.g., expansions GM would have notified the agency concerning, and not minor changes due to entry and departure of vehicles in and out of the country, as one example) state when it changed the population, and provide a separate aggregation of data for the changed population.

In the event GM is unable to separate its records between rental car companies and all other owners and purchasers of campaigned vehicles, then please so state, explain why it cannot do so, and provide the above information as to the all campaigned vehicles.

3. Provide a description of the information and information sources GM used in compiling its responses to questions 1 and 2 and the process or procedure GM used in calculating those responses.
4. Provide any additional information GM considers important for the agency to consider in reviewing and evaluating GM's responses to any of the requests above. As one example, identify any anomalies in the data and explain the reason(s) for those anomalies.

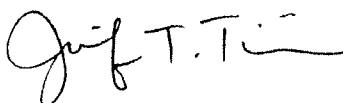
The agency is not requesting the supporting information and data GM used in providing its responses to the above. Please be reminded, however, that it may request to review that information during the course of this investigation. Please do not discard or otherwise destroy that information.

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, the company must submit supporting information together with the materials that are the subject of the confidentiality request, to the Office of Chief Counsel, National Highway Traffic Safety Administration, 1200 New Jersey Ave., SE, Washington, D.C. 20590. Please see 49 CFR Part 512 for further instructions as to what is required to properly file a request for confidential treatment.

Please provide your response to this letter within 6 weeks of its date.

Please direct your response to me and note conspicuously on your response the investigation number assigned to this matter (e.g., AQ10-001). Should you have any questions or concerns, do not hesitate to contact me on (202) 366-0209 or by email at jennifer.timian@dot.gov.

Sincerely,

A handwritten signature in black ink that reads "Jenifer T. Timian". The signature is written in a cursive style with a horizontal line at the end.

Jennifer T. Timian
Chief, Recall Management Division
Office of Defects Investigation
Enforcement



January 14, 2011

Jennifer T. Timian, Chief
Recall Management Division
Office of Defects Investigation
National Highway Traffic Safety Administration
1200 New Jersey Ave., S. E., Room W46-409
Washington, D.C. 20590

N100401

NVS-215jt
AQ10-001

Dear Ms. Timian:

This letter is General Motors (GM) response to your audit query (AQ), dated November 18, 2010, to investigate recall remedy completion by rental car fleets on certain safety and non-compliance recall campaigns that General Motors has conducted.

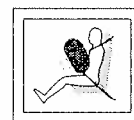
Your requests and our corresponding replies are as follows:

1. Separately for each subject recall, provide a table with the following information.

(a) The recall's launch date;

(b) The top ten rental car companies, and then for each company;

- I. Its launch count;
- II. Its count at 30 days;
- III. Number of vehicles remedied at 30 days;
- IV. Percentage of vehicles remedied at 30 days;
- V. Its count at 60 days;
- VI. Number of vehicles remedied at 60 days;
- VII. Percentage of vehicles remedied at 60 days;
- VIII. Its count at 90 days;
- IX. Number of vehicles remedied at 90 days;
- X. Percentage of vehicles remedied at 90 days;
- XI. Its count at 120 days;
- XII. Number of vehicles remedied at 120 days;
- XIII. Percentage of vehicles remedied at 120 days;
- XIV. Its count at 365 days;
- XV. Number of vehicles remedied at 365 days; and
- XVI. Percentage of vehicles remedied at 365 days;



Conspicuously identify the subject recall's NHTSA assigned identification number on each table and name each table "Rental Car Completion Analysis for [insert MHTSA identification number as applicable]." Provide the tables in Microsoft Access or Microsoft Excel format.

In the event GM expanded the scope of the campaigned vehicles in any significant manner during the course of a campaign, (e.g., expansions GM would have notified the agency concerning, and not minor changes due to entry and departure of vehicles in and out of the country, as one example) state when it changed the population, and provide a separate aggregation of data for the changed population.

General Motor's response to request 1 is provided on the ATT_1_GM disk; folder labeled "Q_01". Refer to the Microsoft Excel files labeled:

"Q_01_09V-073"
"Q_01_09V-392"
"Q_01_10V-018"
"Q_01_10V-024"

Each of these Microsoft Excel files contains a sheet titled "Information". This sheet includes the following informaton:

- NHTSA recall number
- Recall launch date
- Total number of vehicles involved in the recall
- A listing of the top 10 (by volume) of the Rental Car Companies that owned at least 25 vehicles at the launch of the recall and the number of vehicles each company owned.
- Total number of vehicles owned by all other owners (designated as "Non-Rental Owners")

Each of these Microsoft Excel files also contains sheets for each Rental Car Company identified in the "Information" sheet. There is also a sheet for all other owners titled "Non-Rental". These sheets provide answers to requests (1) (b) I – XVI, as well as requests (2) (a) – (l).

2. **Separately, for each subject recall, provide a table with the following information as it relates to all other vehicles covered by the subject recall exclusive of the rental car campaigned vehicles;**
 - a. **The recall's launch date;**
 - b. **The total vehicles at launch;**
 - c. **Number of vehicles remedied at 30 days;**

- d. Percentage of vehicles remedied at 30 days;
- e. Number of vehicles remedied at 60 days;
- f. Percentage of vehicles remedied at 60 days;
- g. Number of vehicles remedied at 90 days;
- h. Percentage of vehicles remedied at 90 days;
- i. Number of vehicles remedied at 120 days;
- j. Percentage of vehicles remedied at 120 days;
- k. Number of vehicles remedied at 365 days;
- l. Percentage of vehicles remedied at 365 days;

Conspicuously identify the subject recall's NHTSA assigned identification number on each table and name each table "Non-Rental Completion Analysis for [insert MHTSA identification number as applicable]." Provide the tables in Microsoft Access or Microsoft Excel format.

In the event GM expanded the scope of the campaigned vehicles in any significant manner during the course of a campaign, (e.g., expansions GM would have notified the agency concerning, and not minor changes due to entry and departure of vehicles in and out of the country, as one example) state when it changed the population, and provide a separate aggregation of data for the changed population.

In the event GM is unable to separate its records between rental car companies and all other owners and purchasers of campaigned vehicles, then please so state, explain why it cannot do so, and provide the above information as to the all campaigned vehicles.

Refer to the answer to request 1.

3. Provide a description of the information and information sources GM used in compiling its responses to questions 1 and 2 and the process or procedure GM used in calculating those responses.

The following is the process that GM used to develop the responses to requests 1 and 2.

- 1) At the time of the recall launch, GM provided a list of vehicle VINs involved in the recall to R.L. Polk.
- 2) R.L. Polk provided to GM a list of owner names and addresses that corresponded to that list of VINs.
- 3) GM reviewed the owner name and address list and identified the "Rental Car Companies" that owned 25 or more vehicles at the time of the launch of the

recall. All other vehicles on the list were then put into a separate group and are described as "Non-Rental" for the purpose of this response.

- 4) In order to determine if a "Rental Car Company" vehicle was sold anytime during the the 365 days following the recall launch, GM provided the VIN list of "Rental Car Company" vehicles to R.L. Polk. R.L. Polk then provided the date that any of these vehicles were re-registered by a subsequent owner, other than the "Rental Car Company". This date was used to represent the date that the vehicle was sold.
- 5) GM then used warranty records to determine the date that the recall repair was made for each of the vehicles.
- 6) Using the information described in steps (1) – (5), GM identified the number of vehicles which had the recall repair completed for each of the "Rental Car Companies" during each of the time increments described in request 1.
- 7) The number of vehicles owned by a rental car company during each of the identified time increments was calculated by subtracting out those vehicles that were identified as having been re-registered by a subsequent owner.
- 8) The percentage of vehicles remedied by a specific "Rental Car Company" at each identified time increment was calculated as follows:

Total number of the "Rental Car Company" vehicles that had been remedied while still owned by the "Rental Car Company" divided by the total number of vehicles owned by the "Rental Car Company" at the launch of the recall.
- 9) The percentage of "Non-Rental" vehicles remedied was calculated as follows:

Total number of the original launch count of "Non-Rental" vehicles that had been remedied divided by the total number of the original launch count of "Non-Rental" vehicles.

4. Provide any additional information GM considers important for the agency to consider in reviewing and evaluating GM's responses to any of the requests above. As one example, identify any anomalies in the data and explain the reason(s) for those anomalies.

- GM used the date that a vehicle was re-registered by a subsequent owner to represent the date that a vehicle changed ownership.
- After the initial launch of 09V-073, the remedy was updated to include an additional retainer clip. The recall completion rates for 09V-073 do not reflect the second repair by those owners who came in prior to the updated bulletin and were notified to bring their vehicles back to complete the repair.

This response is based on searches of General Motors (GM) locations where information determined to be responsive to your request would ordinarily be found.

This response was compiled and prepared by this office upon review of the information produced by various GM locations. It does not include information 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,



M. Carmen Benavides
Director, Product Investigations
and Safety Regulations

Attachments

N100401
AQ10-001

ATTACHMENT "1"

GM NON-CONFIDENTIAL MATERIAL

NHTSA Recall 09V-073



Shift Lever Indicator

2009 Buick Enclave; Chevrolet Cobalt, HHR,
Malibu, Traverse; GMC Acadia; Pontiac G6;
Saturn Aura, Outlook

Recall Launch Date(s): March 9, 2009 & June 25, 2009

Total Recall Launch Count: 378,583 (March 9, 2009 = 276,857 / June 25, 2009 = 101,726)

Launch count for all rental car companies with greater than 25 vehicles: March 9, 2009 = 614 / June 25, 2009 = 47,939

Launch count for all other owners: March 9, 2009 = 276,243 / June 25, 2009 = 53,787

Rental Car Companies	Total Vehicles in 09V-073	Launch March 9, 2009	Launch June 25, 2009
Ace Car Rental (ACE)	49		49
Arelco Inc.	54		54
Avis Budget Group (ABG)	12,425	230	12,195
Car Truck Rentals (CTR)	88		88
Coates Motor Rental Inc.	49		49
Dollar Thrifty Automotive Group (DTAG)	77	61	16
Enterprise Rent-A-Car (ERAC)	29,049	287	28,762
General American Rentals (GAR)	201		201
Hertz	5,513	36	5,477
Midwest Car Corp (MCC)	1,048		1,048
Non Rental	330,030	276,243	53,787
Total	378,583	276,857	101,726

NHTSA Recall 09V-073 Shift Lever Indicator 2009 Buick Enclave; Chevrolet Cobalt, HHR, Malibu,
 Traverse; GMC Acadia; Pontiac G6;
Saturn Aura, Outlook

Rental Car Company: Ace Rent A Car
Launch Date: June 25, 2009 / Launch Count: 49

	Launch 6/25/2009	30 Days 7/25/2009	60 Days 8/24/2009	90 Days 9/23/2009	120 Days 10/23/2009	365 Days 6/25/2010
Recall Vehicles owned by Ace	49	49	49	49	45	14
Total Ace Launch Count Vehicles Remedied by Ace		0	5	2	8	0
Percentage of Ace launch count remedied by Ace		0%	10%	14%	31%	55%

NHTSA Recall 09V-073 Shift Lever Indicator 2009 Buick Enclave; Chevrolet Cobalt, HHR, Malibu,
 Traverse; GMC Acadia; Pontiac G6;
Saturn Aura, Outlook

Rental Car Company: ARELCO Inc
Launch Date: June 25, 2009 / Launch Count: 54

	Launch 6/25/2009	30 Days 7/25/2009	60 Days 8/24/2009	90 Days 9/23/2009	120 Days 10/23/2009	365 Days 6/25/2010
Recall Vehicles owned by ARELCO	54	49	43	38	33	8
Total ARELCO Launch Count Vehicles Remedied by ARELCO		4	7	11	3	0
Percentage of ARELCO launch count remedied by ARELCO		7%	20%	41%	46%	56%

NHTSA Recall 09V-073 Shift Lever Indicator		2009 Buick Enclave; Chevrolet Cobalt, HHR, Malibu, Traverse; GMC Acadia; Pontiac G6; Saturn Aura, Outlook				
□						
Rental Car Company: Avis Budget Group (ABG)						
Launch Date: March 9, 2009 / Launch Count: 230						
	Launch 3/21/2009	30 Days 4/20/2009	60 Days 5/20/2009	90 Days 6/19/2009	120 Days 7/19/2009	365 Days 3/21/2010
Recall Vehicles owned by ABG	230	222	217	209	201	163
Total ABG Launch Count Vehicles Remedied by ABG		87	46	8	9	0
Percentage of ABG launch count remedied by ABG		38%	58%	61%	65%	79%

NHTSA Recall 09V-073 Shift Lever Indicator		2009 Buick Enclave; Chevrolet Cobalt, HHR, Malibu, Traverse; GMC Acadia; Pontiac G6; Saturn Aura, Outlook				
□						
Rental Car Company: Avis Budget Group (ABG)						
Launch Date: June 25, 2009 / Launch Count: 12,195						
	Launch 6/25/2009	30 Days 7/25/2009	60 Days 8/24/2009	90 Days 9/23/2009	120 Days 10/23/2009	365 Days 6/25/2010
Recall Vehicles owned by ABG	12,195	11,781	11,352	11,180	10,884	8,510
Total ABG Launch Count Vehicles Remedied by ABG		1,841	1,541	381	130	396
Percentage of ABG launch count remedied by ABG		15%	28%	31%	32%	48%

NHTSA Recall 09V-073 Shift Lever Indicator 2009 Buick Enclave; Chevrolet Cobalt, HHR, Malibu,
 Traverse; GMC Acadia; Pontiac G6;
Saturn Aura, Outlook

Rental Car Company: Car Truck Rentals Inc
Launch Date: June 25, 2009 / Launch Count: 88

	Launch 6/25/2009	30 Days 7/25/2009	60 Days 8/24/2009	90 Days 9/23/2009	120 Days 10/23/2009	365 Days 6/25/2010
Recall Vehicles owned by Car Truck	88	88	88	88	88	88
Total Car Truck Launch Count Vehicles Remedied by Car Truck		0	0	1	0	12
Percentage of Car Truck launch count remedied by Car Truck		0%	0%	1%	1%	34%

NHTSA Recall 09V-073 Shift Lever Indicator 2009 Buick Enclave; Chevrolet Cobalt, HHR, Malibu,
 Traverse; GMC Acadia; Pontiac G6;
Saturn Aura, Outlook

Rental Car Company: COATES
Launch Date: June 25, 2009 / Launch Count: 49

	Launch 6/25/2009	30 Days 7/25/2009	60 Days 8/24/2009	90 Days 9/23/2009	120 Days 10/23/2009	365 Days 6/25/2010
Recall Vehicles owned by COATES	49	49	49	49	49	48
Total COATES Launch Count Vehicles Remedied by COATES		2	0	2	1	1
Percentage of COATES launch count remedied by COATES		4%	4%	8%	10%	69%

NHTSA Recall 09V-073 Shift Lever Indicator		2009 Buick Enclave; Chevrolet Cobalt, HHR, Malibu, Traverse; GMC Acadia; Pontiac G6; Saturn Aura, Outlook				
□						
Rental Car Company: DTAG Thrifty						
Launch Date: March 9, 2009 / Launch Count: 61						
	Launch 3/21/2009	30 Days 4/20/2009	60 Days 5/20/2009	90 Days 6/19/2009	120 Days 7/19/2009	365 Days 3/21/2010
Recall Vehicles owned by DTAG	61	60	60	60	60	37
Total DTAG Launch Count Vehicles Remedied by DTAG		0	2	2	1	0
Percentage of DTAG launch count remedied by DTAG		0%	3%	7%	8%	16%

NHTSA Recall 09V-073 Shift Lever Indicator		2009 Buick Enclave; Chevrolet Cobalt, HHR, Malibu, Traverse; GMC Acadia; Pontiac G6; Saturn Aura, Outlook				
□						
Rental Car Company: DTAG Thrifty						
Launch Date: June 25, 2009 / Launch Count: 16						
	Launch 6/25/2009	30 Days 7/25/2009	60 Days 8/24/2009	90 Days 9/23/2009	120 Days 10/23/2009	365 Days 6/25/2010
Recall Vehicles owned by DTAG	16	16	16	16	16	1
Total DTAG Launch Count Vehicles Remedied by DTAG		0	0	3	0	0
Percentage of DTAG launch count remedied by DTAG		0%	0%	19%	19%	31%

NHTSA Recall 09V-073 Shift Lever Indicator		2009 Buick Enclave; Chevrolet Cobalt, HHR, Malibu, Traverse; GMC Acadia; Pontiac G6; Saturn Aura, Outlook				
□						
Rental Car Company: Enterprise Rent-a-Car (ERAC)						
Launch Date: March 9, 2009 / Launch Count: 287						
	Launch 3/21/2009	30 Days 4/20/2009	60 Days 5/20/2009	90 Days 6/19/2009	120 Days 7/19/2009	365 Days 3/21/2010
Recall Vehicles owned by ERAC	287	284	272	271	266	198
Total ERAC Launch Count Vehicles Remedied by ERAC		115	42	17	6	3
Percentage of ERAC launch count remedied by ERAC		40%	55%	61%	63%	77%

NHTSA Recall 09V-073 Shift Lever Indicator		2009 Buick Enclave; Chevrolet Cobalt, HHR, Malibu, Traverse; GMC Acadia; Pontiac G6; Saturn Aura, Outlook				
□						
Rental Car Company: Enterprise Rent-a-Car (ERAC)						
Launch Date: June 25, 2009 / Launch Count: 28,762						
	Launch 6/25/2009	30 Days 7/25/2009	60 Days 8/24/2009	90 Days 9/23/2009	120 Days 10/23/2009	365 Days 6/25/2010
Recall Vehicles owned by ERAC	28,762	28,360	27,899	27,211	26,297	21,848
Total ERAC Launch Count Vehicles Remedied by ERAC		9,601	5,543	1,545	1,579	285
Percentage of ERAC launch count remedied by ERAC		33%	53%	58%	64%	80%

NHTSA Recall 09V-073 Shift Lever Indicator 2009 Buick Enclave; Chevrolet Cobalt, HHR, Malibu, <input type="checkbox"/> Traverse; GMC Acadia; Pontiac G6; Saturn Aura, Outlook						
Rental Car Company: General Amer Rentals Inc Launch Date: June 25, 2009 / Launch Count: 201						
	Launch 6/25/2009	30 Days 7/25/2009	60 Days 8/24/2009	90 Days 9/23/2009	120 Days 10/23/2009	365 Days 6/25/2010
Recall Vehicles owned by General Amer	201	201	200	185	168	63
Total General Amer Launch Count Vehicles Remedied by General Amer		0	8	12	43	1
Percentage of General Amer launch count remedied by General Amer		0%	4%	10%	31%	55%

NHTSA Recall 09V-073 Shift Lever Indicator 2009 Buick Enclave; Chevrolet Cobalt, HHR, Malibu, <input type="checkbox"/> Traverse; GMC Acadia; Pontiac G5, G6; Saturn Aura, Outlook Rental Car Company: Hertz Rent-a-Car (Hertz) Launch Date: March 9, 2009 / Launch Count: 36						
	Launch 3/21/2009	30 Days 4/20/2009	60 Days 5/20/2009	90 Days 6/19/2009	120 Days 7/19/2009	365 Days 3/21/2010
Recall Vehicles owned by Hertz	36	36	36	36	36	32
Total Hertz Launch Count Vehicles Remedied by Hertz		26	8	1	0	0
Percentage of Hertz launch count remedied by Hertz		72%	94%	97%	97%	97%

NHTSA Recall 09V-073 Shift Lever Indicator 2009 Buick Enclave; Chevrolet Cobalt, HHR, Malibu, <input type="checkbox"/> Traverse; GMC Acadia; Pontiac G6; Saturn Aura, Outlook Rental Car Company: Hertz Rent-a-Car (Hertz) Launch Date: June 25, 2009 / Launch Count: 5,477						
	Launch 6/25/2009	30 Days 7/25/2009	60 Days 8/24/2009	90 Days 9/23/2009	120 Days 10/23/2009	365 Days 6/25/2010
Recall Vehicles owned by Hertz	5,477	5,474	5,472	5,465	5,462	4,228
Total Hertz Launch Count Vehicles Remedied by Hertz		994	573	261	169	121
Percentage of Hertz launch count remedied by Hertz		18%	29%	33%	36%	57%

NHTSA Recall 09V-073 Shift Lever Indicator 2009 Buick Enclave; Chevrolet Cobalt, HHR, Malibu, <input type="checkbox"/> Traverse; GMC Acadia; Pontiac G6; Saturn Aura, Outlook						
Rental Car Company: Midwest Car Corp Launch Date: June 25, 2009 / Launch Count: 1,048						
	Launch 6/25/2009	30 Days 7/25/2009	60 Days 8/24/2009	90 Days 9/23/2009	120 Days 10/23/2009	365 Days 6/25/2010
Recall Vehicles owned by Midwest	1,048	1,045	1,045	1,045	1,045	978
Total Midwest Launch Count Vehicles Remedied by Midwest		71	222	86	32	25
Percentage of Midwest launch count remedied by Midwest		7%	28%	36%	39%	67%

NHTSA Recall 09V-073 Shift Lever Indicator <input type="checkbox"/>		2009 Buick Enclave; Chevrolet Cobalt, HHR, Malibu, Traverse; GMC Acadia; Pontiac G6; Saturn Aura, Outlook			
All Non Rental Launch Date: March 9, 2009 / Launch Count: 276,243					
	30 Days 4/8/2009	60 Days 5/8/2009	90 Days 6/7/2009	Days 7/7/2009	365 Days 3/9/2010
Total Launch Count Vehicles remedied for all other owners	81,061	29,642	26,056	15,934	6,222
Percentage of Launch Count Vehicles (other owners) remedied for all other owners	29%	40%	50%	55%	85%

NHTSA Recall 09V-073 Shift Lever Indicator <input type="checkbox"/>		2009 Buick Enclave; Chevrolet Cobalt, HHR, Malibu, Traverse; GMC Acadia; Pontiac G6; Saturn Aura, Outlook			
All Non Rental Launch Date: June 25, 2009 / Launch Count: 53,787					
	30 Days 7/25/2009	60 Days 8/24/2009	90 Days 9/23/2009	120 Days 10/23/2009	365 Days 6/25/2010
Total Launch Count Vehicles remedied for all other owners	9,021	8,207	5,035	2,414	717
Percentage of Launch Count Vehicles (other owners) remedied for all other owners	17%	32%	41%	46%	61%

NHTSA Recall 09V-392 Brake Vacuum Suction Port 2009-2010 Pontiac Vibe

Recall Launch Date(s): October 23, 2009

Total Recall Launch Count: 8,704

Launch count for all rental car companies with greater than 25 vehicles: 28

Launch count for all other owners: 8,676

Rental Car Companies	Total Vehicles in 09V-392
Enterprise Rent-A-Car (ERAC)	28
Non Rental	8,676
Total	8,704

NHTSA Recall 09V-392 Brake Vacuum Suction Port 2009-2010 Pontiac Vibe

Rental Car Company: Enterprise Rent-a-Car (ERAC)

ERAC Launch Count: 28

	Launch 10/23/2009	30 Days 11/22/2009	60 Days 12/22/2009	90 Days 1/21/2010	120 Days 2/20/2010	365 Days 10/23/2010
Recall Vehicles owned by ERAC	28	28	24	20	18	6
Total ERAC Launch Count Vehicles Remedied by ERAC		3	1	4	2	1
Percentage of ERAC launch count remedied by ERAC		11%	14%	29%	36%	39%

NHTSA Recall 09V-392

Brake Vacuum Suction Port

2009-2010 Pontiac Vibe

All Non Rental

Launch Count: 8,676

	30 Days 11/22/2009	60 Days 12/22/2009	90 Days 1/21/2010	120 Days 2/20/2010	365 Days 10/23/2010
Total Launch Count Vehicles remedied for all other owners	3,201	1,524	659	589	1,754
Percentage of Launch Count Vehicles (other owners) remedied for all other owners	37%	54%	62%	69%	89%

NHTSA Recall 10V-018 Sticking Accelerator Pedal 2009-2010 Pontiac Vibe

Recall Launch Date(s): February 11-12, 2010

Total Recall Launch Count: 70,805

Launch count for all rental car companies with greater than 25 vehicles: 11,125

Launch count for all other owners: 59,680

Rental Car Companies	Total Vehicles in 10V-018
Avis Budget Group (ABG)	3,182
Enterprise Rent-A-Car (ERAC)	7,167
Hertz	33
Midwest Car Corp (MCC)	710
Thifty Car Rental (TCR)	33
Non Rental	59,680
Total	70,805

NHTSA Recall 10V-018 Sticking Accelerator Pedal 2009-2010 Pontiac Vibe

Rental Car Company: Avis Budget Group (ABG)

ABG Launch Count: 3,182

	Launch 2/12/2010	30 days 3/13/2010	60 days 4/12/2010	90 days 5/12/2010	120 Days 6/11/2010	365 days 2/12/2011
Recall Vehicles owned by ABG	3,182	3,030	2,873	2,659	2,441	N/A
Total ABG Launch Count Vehicles Remedied by ABG		2,846	74	17	10	N/A
Percentage of ABG launch count remedied by ABG		89%	92%	92%	93%	N/A

NHTSA Recall 10V-018 Sticking Accelerator Pedal 2009-2010 Pontiac Vibe
Rental Car Company: Enterprise Rent-a-Car (ERAC)
ERAC Launch Count: 7,167

	Launch 2/12/2010	30 days 3/13/2010	60 days 4/12/2010	90 days 5/12/2010	120 Days 6/11/2010	365 days 2/12/2011
Recall Vehicles owned by ERAC	7,167	6,994	6,764	6,362	6,062	N/A
Total ERAC Launch Count Vehicles Remedied by ERAC		5,046	1,261	158	35	N/A
Percentage of ERAC launch count remedied by ERAC		70%	88%	90%	91%	N/A

NHTSA Recall 10V-018 Sticking Accelerator Pedal 2009-2010 Pontiac Vibe

Rental Car Company: Hertz Rent-a-Car (Hertz)

Hertz Launch Count: 33

	Launch 2/12/2010	30 days 3/13/2010	60 days 4/12/2010	90 days 5/12/2010	120 Days 6/11/2010	365 days 2/12/2011
Recall Vehicles owned by Hertz	33	33	33	31	31	N/A
Total Hertz Launch Count Vehicles Remedied by Hertz		24	3	0	1	N/A
Percentage of Hertz launch count remedied by Hertz		73%	82%	82%	85%	N/A

NHTSA Recall 10V-018 Sticking Accelerator Pedal 2009-2010 Pontiac Vibe

Rental Car Company: Midwest Car Corp (MCC)

MCC Launch Count: 710

	Launch 2/12/2010	30 days 3/13/2010	60 days 4/12/2010	90 days 5/12/2010	120 Days 6/11/2010	365 days 2/12/2011
Recall Vehicles owned by MCC	710	697	688	656	613	N/A
Total MCC Launch Count Vehicles Remedied by MCC		565	106	8	0	N/A
Percentage of MCC launch count remedied by MCC		80%	95%	96%	96%	N/A

NHTSA Recall 10V-018 Sticking Accelerator Pedal 2009-2010 Pontiac Vibe

Rental Car Company: Thrifty Car Rental (TCR)

TCR Launch Count: 33

	Launch 2/12/2010	30 days 3/13/2010	60 days 4/12/2010	90 days 5/12/2010	120 Days 6/11/2010	365 days 2/12/2011
Recall Vehicles owned by TCR	33	33	33	33	31	N/A
Total TCR Launch Count Vehicles Remedied by TCR		31	1	0	0	N/A
Percentage of TCR launch count remedied by TCR		94%	97%	97%	97%	N/A

NHTSA Recall 10V-018 Sticking Accelerator Pedal 2009-2010 Pontiac Vibe

All Non Rental

Launch Count: 59,680

	30 days 3/13/2010	60 days 4/12/2010	90 days 5/12/2010	120 days 6/11/2011	365 days 2/12/2011
Total Launch Count Vehicles remedied for all other owners	27,192	8,101	3,774	2,137	N/A
Percentage of Launch Count Vehicles (other owners) remedied for all other owners	46%	59%	65%	69%	N/A

NHTSA Recall 10V-024 Pedal Entrapment 2009-2010 Pontiac Vibe

Recall Launch Date(s): July 20, 2010

Total Recall Launch Count: 70,805

Launch count for all rental car companies with greater than 25 vehicles: 8,336

Launch count for all other owners: 62,469

Rental Car Companies	Total Vehicles in 10V-024
Avis Budget Group (ABG)	2,138
Enterprise Rent-A-Car (ERAC)	5,577
Hertz	31
Midwest Car Corp (MCC)	560
Thifty Car Rental (TCR)	30
Non Rental	62,469
Total	70,805

NHTSA Recall 10V-024 Pedal Entrapment 2009-2010 Pontiac Vibe

Rental Car Company: Avis Budget Group (ABG)

ABG Launch Count: 2,138

	Launch 7/20/2010	30 Days 8/19/2010	60 Days 9/18/2010	90 Days 10/18/2010	120 Days 11/17/2010	365 Days 7/20/2011
Recall Vehicles owned by ABG	2,138	1,919	1,734	1,539	1,407	N/A
Total ABG Launch Count Vehicles Remedied by ABG		597	596	165	36	N/A
Percentage of ABG launch count remedied by ABG		28%	56%	64%	65%	N/A

NHTSA Recall 10V-024 Pedal Entrapment 2009-2010 Pontiac Vibe

Rental Car Company: Enterprise Rent-a-Car (ERAC)

ERAC Launch Count:

	Launch 7/20/2010	30 Days 8/19/2010	60 Days 9/18/2010	90 Days 10/18/2010	120 Days 11/17/2010	365 Days 7/20/2011
Recall Vehicles owned by ERAC	5,577	5,156	4,778	4,327	3,992	N/A
Total ERAC Launch Count Vehicles Remedied by ERAC		3,126	368	196	75	N/A
Percentage of ERAC launch count remedied by ERAC		56%	63%	66%	68%	N/A

NHTSA Recall 10V-024 Pedal Entrapment 2009-2010 Pontiac Vibe

Rental Car Company: Hertz Rent-a-Car (Hertz)

Hertz Launch Count: 31

	Launch 7/20/2010	30 Days 8/19/2010	60 Days 9/18/2010	90 Days 10/18/2010	120 Days 11/17/2010	365 Days 7/20/2011
Recall Vehicles owned by Hertz	31	27	27	25	23	N/A
Total Hertz Launch Count Vehicles Remedied by Hertz		17	1	2	1	N/A
Percentage of Hertz launch count remedied by Hertz		55%	58%	65%	68%	N/A

NHTSA Recall 10V-024 Pedal Entrapment 2009-2010 Pontiac Vibe

Rental Car Company: Midwest Car Corp (MCC)

MCC Launch Count: 560

	Launch 7/20/2010	30 Days 8/19/2010	60 Days 9/18/2010	90 Days 10/18/2010	120 Days 11/17/2010	365 Days 7/20/2011
Recall Vehicles owned by MCC	560	509	439	371	305	N/A
Total MCC Launch Count Vehicles Remedied by MCC		104	59	39	13	N/A
Percentage of MCC launch count remedied by MCC		19%	29%	36%	38%	N/A

NHTSA Recall 10V-024 Pedal Entrapment 2009-2010 Pontiac Vibe

Rental Car Company: Thrifty Car Rental (TCR)

TCR Launch Count: 30

	Launch 7/20/2010	30 Days 8/19/2010	60 Days 9/18/2010	90 Days 10/18/2010	120 Days 11/17/2010	365 Days 7/20/2011
Recall Vehicles owned by TCR	30	26	25	23	23	N/A
Total TCR Launch Count Vehicles Remedied by TCR		6	6	1	0	N/A
Percentage of TCR launch count remedied by TCR		20%	40%	43%	43%	N/A

NHTSA Recall 10V-024 Pedal Entrapment 2009-2010 Pontiac Vibe

All Non Rental

Launch Count: 62,469

	30 Days 8/19/2010	60 Days 9/18/2010	90 Days 10/18/2010	120 Days 11/17/2010	365 Days 7/20/2011
Total Launch Count Vehicles remedied for all other owners	8,998	7,795	4,815	3,335	N/A
Percentage of Launch Count Vehicles (other owners) remedied for all other owners	14%	27%	35%	40%	N/A