

Orig #1



GENERAL MOTORS LLC  
Global Interior and Safety Center

GM Reply Date: May 27, 2011

N090239A Supplemental – 1

Book 1 of 1

NHTSA # EA10-004

NHTSA Requesting Engineer #1

**Non-Confidential**

**Subject vehicles:** All MY 2007 GM vehicles including but not limited to the Tahoe, Yukon, Yukon XL, Suburban, Avalanche, Escalade, Silverado, and Sierra models.

**Subject component:** All chrome or chrome plated interior door handles manufactured prior to October 31, 2006 (i.e., manufactured by the MacDonald Corporation, or using the MacDonald tooling) for use on MY 2007 GM vehicles including but not limited to the Tahoe, Yukon, Yukon XL, Suburban, Avalanche, Escalade, Silverado, and Sierra models.

**Alleged defect:** Peeling or separation of the chrome plating on the interior door handles.

Tab (1).....NHTSA Letter

Tab (2).....GM Response Letter to NHTSA

Tab (3).....Attachment (1) Material CD

*6/1/11* *[Signature]*

2011 JUN - 1 A 8:10

OFFICE OF DEFECTS &  
INVESTIGATIONS

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INVESTIGATIONS

2011 JUN - 1 A 8:10

**N090239A Supp 1.  
EA10-004**

**GM RESPONSE**



GENERAL MOTORS LLC  
Global Interior and Safety Center

May 27, 2011

Scott Yon, Chief  
Vehicle Integrity Division  
Office of Defects Investigation  
National Highway Traffic Safety Administration  
1200 New Jersey Ave., S. E., Room W46-409  
Washington, D.C. 20590

N090239A\_Supp1

NVS-212ls  
EA10-004\_Supp1

Dear Mr. Yon:

This letter is General Motors' (GM) response to your request for an information update for Engineering Analysis (EA) EA10-004, regarding allegations of a laceration hazard resulting from sharp edges in the chrome plating on interior door handles. The subject vehicles are 2007 model year Chevrolet Tahoe, Suburban, Silverado and Avalanche, GMC Yukon, Sierra and Denali, and Cadillac Escalade vehicles, built prior to and including October 31, 2006, equipped with interior chrome handles, and manufactured for sale or lease in the United States.

NHTSA has requested an update of the information previously supplied by GM in Requests 2 through 6 of EA10-004. In addition, NHTSA has requested the last known state of registration for the subject vehicles included in special coverage 09239, which GM launched in July, 2010. A letter explaining this special coverage was mailed to the vehicle owners. This special coverage applies to subject vehicles built on or before August 31, 2006 and provides replacement of the front and/or rear chrome door handle levers if signs of peeling are present. The repairs are made at no charge to the customer. The special coverage also includes a procedure for customer reimbursement for previous repairs for the special coverage condition.

This response includes only additional reports and claims not previously included in GM's response to PE09-044 sent on November 9, 2009 and EA10-004 sent on August 16, 2010.

Your requests and our corresponding replies are as follows:

**NHTSA has requested the last known state of registration for the subject vehicles included in special coverage 09239, which GM launched in July, 2010.**

The registration information for the last known registered state for the special coverage population is provided on the ATT\_1\_GM disk; folder labeled "Special Coverage Registration"; refer to the Microsoft Access 2000 file labeled SC\_09239A\_State\_Registration\_2010".





- 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 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. 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 "d" 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 "f," 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 "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.

Table 2-1 below summarizes records that may relate to allegations of a laceration hazard resulting from sharp edges in the chrome plating on the interior door handle. 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	411	0	0	0	110 / 0
Field Reports	0	0	0	0	0 / 0
Not-In-Suit Claims	4	0	0	0	4 / 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)	415	0	0	0	114 / 0
Total Vehicles with Reports (Unique VIN)	412	0	0	0	112 / 0

TABLE 2-1: REPORT CLASSIFICATION - ALLEGATIONS OF LACERATION HAZARD  
\* THERE WERE NO FATALITIES ASSOCIATED WITH THIS ISSUE

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	April 20, 2011
Technical Assistance Center	April 21, 2011
Field Information Network Database (FIND)	April 25, 2011
Field Product Report Database (FPRD)	April 25, 2011
Company Vehicle Evaluation Program (CVEP)	April 21, 2011
Captured Test Fleet (CTF)	April 21, 2011
Early Quality Feedback (EQF)	April 21, 2011
Legal/Employee Self Insured Services (ESIS)/Product Liability Claims/Lawsuits	April 26, 2011

TABLE 2-2: DATA SOURCES

There are additional owner reports that were generated in order to obtain reimbursements that are not included in Table 2-1. For owners to be reimbursed, they were required to send a reimbursement form to the GM Customer Assistance Center (CAC), which generates an owner report. GM is not including those reports in this response. However, for each of these reimbursement reports, there is a corresponding warranty claim that is included in the response to Request 5. These warranty claims are designated by GM labor code T5754.

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, field report, etc.);



- c. Vehicle owner or fleet name (and fleet contact person), address, and telephone number;
- d. Vehicle's VIN;
- e. Vehicle's make, model and 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 property damage is alleged;
- k. Number of alleged injuries, if any;
- l. Whether the injury lead to or required medical treatment;
- m. Location(s) in the vehicle (e.g., LF) of the door handle(s) that caused the injury(ies); and
- n. Number of alleged fatalities, if any.

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; folder labeled "Q\_03"; refer to the Microsoft Access 2000 file labeled "Q\_03\_REQUEST NUMBER TWO DATA". The assessment of injuries is based upon assessment criteria from the National Accident Sampling System Crashworthiness Data System - AIS - 90 Injury Coding Manual.

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 embedded in the file provided in ATT\_1\_GM disk; folder labeled "Q\_03"; refer to the Microsoft Access file labeled "Q\_03\_REQUEST NUMBER TWO DATA". GM has organized the records by the GM file number within each attachment.

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.

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, or may relate to, the alleged defect 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) including door location (LF, etc);
- 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."

For the subject vehicles, the regular warranty, goodwill warranty and special coverage warranty claims with allegations of peeling or separation of the chrome plating of the interior door handles are summarized by model in Table 5-1. The vast majority of these claims only describe cosmetic issues such as peeling or separation of the chrome plating. The MIC extended service contract claims are summarized by model and model year in Table 5-2. There were no responsive UWC warranty claims. A summary of the warranty claims, including the information requested in 5(a-k), is provided on the ATT\_1\_GM disk; folder labeled "Q\_05"; refer to the Microsoft Access 2000 file labeled "Q\_05\_WARRANTY DATA".

MAKE	MODEL	2007 MY
Cadillac	Escalade, Escalade EXT, Escalade ESV	3,844
Chevrolet	Avalanche	5,795
GMC	Sierra	23
Chevrolet	Silverado	56
Chevrolet	Suburban	9,666
Chevrolet	Tahoe	16,261
GMC	Yukon, Yukon XL	13,780
Total		49,425

TABLE 5-1: REGULAR WARRANTY CLAIMS WITH ALLEGATIONS  
OF PEELING OR SEPARATION OF THE CHROME PLATING  
OF THE INTERIOR DOOR HANDLES



MAKE	MODEL	2007 MY
Cadillac	Escalade, Escalade EXT, Escalade ESV	84
Chevrolet	Avalanche	84
GMC	Sierra	1
Chevrolet	Silverado	5
Chevrolet	Suburban	145
Chevrolet	Tahoe	190
GMC	Yukon, Yukon XL	245
Total		754

TABLE 5-2: MIC EXTENDED SERVICE CONTRACT CLAIMS  
WITH ALLEGATIONS OF PEELING OR SEPARATION OF THE  
CHROME PLATING OF THE INTERIOR DOOR HANDLES

SOURCE SYSTEM	LAST DATE GATHERED
GART – regular warranty	April 25, 2011
MIC – extended service contract claims	April 20, 2011
UWC – extended service contract claims	April 19, 2011

TABLE 5-4: DATA SOURCES

GM searched the GM Global Analysis and Reporting Tool (GART-regular warranty), the Motors Insurance Corporation (MIC-extended service contract claims) and the Universal Warranty Corporation (UWC-extended service contract claims) databases to collect the warranty data for this response.

GM's warranty database does not contain the following information: vehicle owner's name, telephone number or customer concern statement. GM is providing a field labeled "Verbatim Text" in response to request no. 5K (dealer/technician comment). 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 warranty data provided has limited analytical value in analyzing the field performance of a motor vehicle component. Some 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\_GM 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 and the Motors Insurance Corp (MIC) extended service contract claims database were searched using the labor codes listed in Table 6-1 that may be related to the alleged defect of peeling or separation of the chrome plating of the interior door handles. All claims with those labor codes were included unless the claim description clearly indicated that the claim was unrelated to the alleged defect.

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 special coverage for this alleged defect is available for a period of 10 years or 100,000 miles, whichever occurs first, from the date the vehicle was originally placed in service. The last three labor codes searched (T5752, T5753, and T5754) pertain to door handle replacement or reimbursement under the special coverage.

LABOR CODE	DESCRIPTION:
B4281	FRONT SIDE DOOR INSIDE HANDLE REPLACEMENT – LEFT SIDE
B4280	FRONT SIDE DOOR INSIDE HANDLE REPLACEMENT – RIGHT SIDE
B4681	REAR SIDE DOOR INSIDE HANDLE REPLACEMENT – LEFT SIDE
B4680	REAR SIDE DOOR INSIDE HANDLE REPLACEMENT – RIGHT SIDE
B4300	HANDLE AND REMOTE CONTROL, FRONT DOOR LOCK – RIGHT
B4301	HANDLE AND REMOTE CONTROL, FRONT DOOR LOCK
B4700	HANDLE AND REMOTE CONTROL, FRONT DOOR LOCK
B4701	HANDLE AND REMOTE CONTROL, FRONT DOOR LOCK LEFT
B4517	HANDLE, REAR SIDE DOOR INSIDE RIGHT REPLACE
B4518	HANDLE, REAR SIDE DOOR INSIDE LEFT REPLACE
B5080	HANDLE SLIDING DOOR INSIDE RIGHT REPLACE
B5081	HANDLE SLIDING DOOR INSIDE LEFT REPLACE
C3240	FRONT SIDE DOOR PULL HANDLE REPLACEMENT – RIGHT SIDE
C3241	FRONT SIDE DOOR PULL HANDLE REPLACEMENT
C3440	REAR SIDE DOOR PULL HANDLE REPLACEMENT
C3441	HANDLE, REAR DOOR INSIDE PULL - LEFT - R&R OR REPLACE



LABOR CODE	DESCRIPTION:
C4440	REAR SIDE DOOR PULL HANDLE REPLACEMENT
C4441	REAR SIDE DOOR PULL HANDLE REPLACEMENT
C3348	FRONT SIDE DOOR TRIM PANEL REPLACEMENT RIGHT SIDE
C3358	FRONT SIDE DOOR TRIM PANEL REPLACEMENT LEFT SIDE
C4830	REAR SIDE DOOR TRIM PANEL REPLACEMENT RIGHT SIDE
C4831	REAR SIDE DOOR TRIM PANEL REPLACEMENT LEFT SIDE
Z1241	PRODUCT LIABILITY/INVESTIGATION REP PR (GOODWILL)
Z1242	PAR-REPAIRS/REIMBURSEMENT (GOODWILL)
Z1243	INSPECTION-PRODUCT ALLEGATION RESOLUTION
T5752	REPLACE FRONT OR REAR DOOR HANDLE LEVERS
T5753	REPLACE FRONT AND REAR DOOR HANDLE LEVERS
T5754	CUSTOMER REIMBURSEMENT (NOT FOR USE BY US GM DEALERS)

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

Some of the VINs have multiple entries for various labor codes. The warranty claims reflect the number of labor operations used by dealers, which is higher than the number of actual visits to dealers for repairs.

The number of extended service contracts on the subject vehicles that have been sold by MIC from July 15, 2010 to April 20, 2011, and the number of contracts sold by UWC from July 14, 2010 to April 19, 2011, regardless of status (in-force, expired, cancelled) is contained in Tables 6-4 and 6-5.

MAKE	MODEL	2007 MY
Cadillac	Escalade, Escalade EXT, Escalade ESV	2,671
Chevrolet	Avalanche	950
GMC	Sierra	1,201
Chevrolet	Silverado	3,552
Chevrolet	Suburban	1,219
Chevrolet	Tahoe	2,626
GMC	Yukon, Yukon XL	2,392
Total		14,611

TABLE 6-4: MIC EXTENDED SERVICE COVERAGE CONTRACTS SOLD  
(REGARDLESS OF STATUS; IN-FORCE, EXPIRED, CANCELLED)

MAKE	MODEL	2007 MY
Cadillac	Escalade, Escalade EXT, Escalade ESV	411
Chevrolet	Avalanche	384
GMC	Sierra	583
Chevrolet	Silverado	1,448
Chevrolet	Suburban	438
Chevrolet	Tahoe	975
GMC	Yukon, Yukon XL	758
Total		4,997

TABLE 6-5: UWC EXTENDED SERVICE COVERAGE CONTRACTS SOLD  
(REGARDLESS OF STATUS; IN-FORCE, EXPIRED, CANCELLED)



In summary, GM does not believe that this condition poses an unreasonable risk to motor vehicle safety because:

- Special Coverage Policy 09239 was issued by GM in July 2010 providing coverage beyond the regular warranty period. It notified owners that their vehicles may have a peeling condition on the top surface of the front or rear chrome interior door handle(s). The recent warranty claims demonstrate that owners have inspected their door handles and many have brought the vehicles to dealerships for replacement of the door handles. This has mitigated the risk of injury by prompting replacement before any chrome separation reaches an advanced state.
- Most claims made under the Special Coverage have had all four door handles replaced at the same time. In contrast, non-special coverage claims, made under regular warranty, describe an average of one or two door handles per vehicle with this condition, and these were typically on the front doors. These facts strongly indicate that many door handles are being replaced as a precaution, before a rough edge or peeling is detected.
- The rate of injury in GM's reports for all subject vehicles is low (0.24 IPTV @ 36 months exposure).
- The reported injuries are minor or superficial and very few required professional medical treatment.
- The vast majority (97.8%) of warranty claims only describe a cosmetic issue.
- Peeling or flaking of the plating may be apparent to the vehicle operator or occupants prior to any risk of a minor injury.
- The rate of injury claims in GM reports in which children were referenced was very low (0.02 IPTV @ 36 months exposure). Those for which "son," "daughter," "grandchild," or "niece" (some of which may be adults) were referenced is also low (0.05 IPTV @ 36 months exposure). This is likely due to the fact that this condition is rarely found in the rear of the vehicle, where children most frequently sit.

\* \* \*

GM claims that certain information, in documents that are part of lawsuit and claims files maintained by the GM Legal Staff, is attorney work product and/or privileged. That information includes notes, memos, reports, photographs, and evaluations by attorneys (and by consultants, claims analysts, investigators, and engineers working at the request of attorneys). GM is producing responsive documents from claims files that are neither attorney work product nor privileged, and withholding those that are attorney work product and/or privileged.

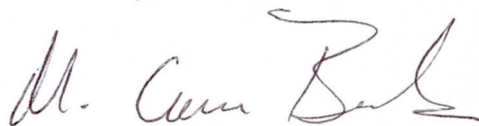
This response is based on searches of General Motors (GM) locations where documents determined to be responsive to your request would ordinarily be found. As a result, the scope of this search did not include, nor could it reasonably include, "all of its divisions, subsidiaries (whether or not incorporated) 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 calendar year 1998, 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,



M. Carmen Benavides  
Director, Product Investigations  
and Safety Regulations

Attachments



**N090239A Supp 1.  
EA10-004**

**ATTACHMENT "1"**

**GM NON-CONFIDENTIAL MATERIAL**