GENERAL MOTORS LLC
Global Interior and Safety Center

November 5, 2010

Ms. Jennifer T. Timian, Chief
Recall Management Division (NVS-215)
Office of Defects Investigation Enforcement
National Highway Traffic Safety Administration
1200 New Jersey Avenue, SE – Room W46-324
Washington, D.C. 20590

N100215

EQ10-008

Dear Ms. Timian:

This letter is written in response to the NHTSA's equipment query investigation, EQ10-008, received by General Motors on October 26, 2010 in relation to Caterpillar C7 diesel engines that Caterpillar has decided contain a safety related defect that could cause a vehicle fire.

This recall is being conducted by:

Caterpillar Inc.
100 NE Adams Street
Peoria, Il 61629-9240

On June 25, 2010, Caterpillar notified GM of their decision to conduct a safety recall for a defect that may exist with the #5 & #6 Fuel Lines on the Common Rail High Pressure Fuel System used on certain Caterpillar C7 Diesel Engines. This notification was the first contact that GM had from Caterpillar related to this issue.

Our records indicate that the involved Caterpillar C7 Diesel Engine was assembled into 356 Chevrolet and GMC C-Series Medium Duty Trucks produced and sold by General Motors in the USA, with the involved - Caterpillar C7 Diesel Engines

On June 30, 2010, a Product Engineering Investigator was assigned this issue to investigate the Caterpillar engine use in the GM vehicles. A search of GM records found no reports of fires in these GM Medium Duty Trucks. Only one warranty claim for repair of a fuel line was found with no comments as to the root cause and no reference to any safety concern.

On July 1, 2010, GM's underhood thermal safety team reviewed the situation and agreed that a leak from this pipe does not constitute a safety risk since no hot surfaces or ignition source is located near the potential leak.

On July 20, 2010 this issue was reviewed in GM's Investigation Status Review meeting. In that meeting, a summary of GM's analysis of the subject vehicles containing the Caterpillar C7S engine was presented. Excerpts from that presentation are included in ATT_1_GM disk; folder labeled "ISR_Presentation". The conclusions from that analysis are:

> GM records had only one warranty claim for repair of a fuel line with no comments as to the root cause and no reference to any safety concern.
>
> No other claims, reports or complaints were found relating to this issue.
>
> A technical assessment of the underhood thermal environment reveals no ignition risk from a fuel leak from the #5 and #6 fuel pipes with no hot surfaces or other ignition source nearby.

As a result of these reviews, on July 20, 2010, GM concluded that the GM vehicles containing the C7 Caterpillar engines do not contain a safety defect that can result in a vehicle fire. However, at the request of Caterpillar, GM has cooperated by providing the necessary VIN information related to safety recall 10E-025. Caterpillar will contact the vehicle owners and make the repairs to these vehicles at Caterpillar Service Centers, consistent with the description in their 573 letter.

Please contact me for any additional information regarding this Caterpillar Recall.

Sincerely,

M. Carmen Benavides
Director, Product Investigations
and Safety Regulations