GENERAL MOTORS LLC
Global Interior and Safety Center

June 18, 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

N100097 Partial

NVS-213cla
PE10-010

Dear Mr. Quandt:

This letter is General Motors (GM) partial response to your Preliminary Evaluation (PE), dated March 30, 2010, regarding allegations of steel brake line corrosion failures in certain model year (MY) 1999 through 2003 GMT800 C/K series vehicles manufactured by General Motors for sale or lease in the United States.

In an e-mail dated May 27, 2010, Stephen McHenry of your staff agreed that the due date for this inquiry is July 2, 2010. However, GM is providing this earlier response to questions 1 – 7 and will provide a response to the remainder of the questions by July 2, 2010.

Your requests and our corresponding responses are as follows:

1. **State, by model and model year, the number of subject vehicles GM has manufactured for sale or lease in the United States. Separately, for each subject vehicle manufactured to date by GM, state the following:**
   a. **Vehicle identification number (VIN);**
   b. **Make;**
   c. **Model;**
   d. **Model Year;**
   e. **Date of manufacture;**
   f. **Brake System Type (ABS, Traction Control, Both);**
   g. **Date warranty coverage commenced; and**
   h. **The State in the United States where the vehicle was originally sold or leased (or delivered for sale or lease).**

   Provide the table in Microsoft Access 2003, or a compatible format, entitled "PRODUCTION DATA." See Enclosure 1, Data Collection Disc, for a pre-formatted table that provides further details regarding this submission.

   General Motors is providing the number of subject vehicles produced for sale or lease in the United States by make, model and model year in Table 1 below:

	MODEL YEARS					
MAKE/MODEL	1999	2000	2001	2002	2003	TOTAL
Chevrolet Silverado	431,010	626,540	622,609	642,096	710,234	3,032,489
Chevrolet Tahoe	N/A	72,539	194,341	207,229	214,942	689,051
Chevrolet Suburban	N/A	85,464	162,776	148,244	146,749	543,233
Chevrolet Avalanche	N/A	N/A	N/A	128,440	86,209	214,649
GMC Sierra	143972	186,541	180,719	195,781	193,452	900,465
GMC Yukon	N/A	26,882	70,851	75,931	89,374	263,038
GMC Yukon XL	N/A	31,612	70,066	68,309	76,691	246,678
Cadillac Escalade	N/A	N/A	N/A	54,006	47,022	101,028
Cadillac Escalade EXT	N/A	N/A	N/A	12,513	11,131	23,644
TOTAL	574,982	1,029,578	1,301,362	1,532,549	1,575,804	6,014,275

TABLE 1 GM SUBJECT VEHICLE (GMT800 SERIES) PRODUCTION

The GM production information requested in 1a-1h is provided on the Att_1_GM disk in the folder labeled "Q_01"; refer to the Microsoft Access 2000 file labeled, "Q_01_PRODUCTION DATA".

GM is providing the state where the vehicle was shipped in response to request 1h. For some of the subject vehicles, which have incomplete warranty files, the GM warranty system does not contain a warranty start date or state where the vehicle was shipped and, therefore, these fields are blank in the Microsoft Access 2000 file.

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. 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;

e. Property damage claims; and
f. Third-party arbitration proceedings where GM is or was a party to the arbitration; and
g. Lawsuits, both pending and closed, in which GM is or was a defendant or codefendant.

For subparts "a" through "e" 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 "g," 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 f and g, 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 the alleged defect in the subject vehicles. 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.

		SUBCATEGORIES				
TYPE OF REPORT	GM REPORTS	CORRESPONDING TO NHTSA REPORTS	NUMBER WITH PROPERTY DAMAGE	NUMBER WITH CRASH	NUMBER WITH INJURIES/ FATALITIES*	NUMBER WITH FIRES
Owner Reports	282	37	4	8	1	0
Field Reports	31	0	0	0	0	0
Not-In-Suit Claims	11	3	10	9	3	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)	324	40	14	17	4	0
Total Vehicles with Reports (Unique VIN)	320	39	12	15	3	0

TABLE 2-1: GM SUBJECT VEHICLE - MAY RELATE TO ALLEGED DEFECT - REPORT CLASSIFICATION

* THERE WERE NO FATALITIES ASSOCIATED WITH THIS ISSUE

To date, GM's investigation of the alleged defect has not included an assessment of the cause(s) of each incident responsive to request 2. Some incident reports may not contain sufficient reliable information to accurately assess cause.

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	04/21/2010
Technical Assistance Center	04/23/2010
Field Information Network Database (FIND)	05/03/2010
Field Product Report Database (FPRD)	04/23/2010
Company Vehicle Evaluation Program (CVEP)	04/28/2010
Captured Test Fleet (CTF)	04/28/2010
Early Quality Feedback (EQF)	04/28/2010
Legal/Employee Self Insured Services (ESIS)/Product Liability Claims/Lawsuits	05/12/2010

TABLE 2-2: DATA SOURCES

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 a fire is alleged;
k. Whether property damage is alleged;
l. Number of alleged injuries, if any; and
m. Number of alleged fatalities, if any.

Provide this information in Microsoft Access 2003, or a compatible format, entitled "REQUEST NUMBER TWO DATA." See Enclosure 1, Data Collection Disc, for a pre-formatted table that provides further details regarding this submission.

The requested GM information is provided on the Att_1_GM disk in the folder labeled "Q_03"; refer to the Microsoft Access 2000 file labeled, "Q_03_REQUEST NUMBER TWO DATA". Some incident reports may not contain sufficient reliable information to accurately answer all parts of request 3.

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 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;**

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 2003, or a compatible format, entitled "WARRANTY DATA." See Enclosure 1, Data Collection Disc, for a pre-formatted table that provides further details regarding this submission.

Table 5-1 summarizes the GM regular warranty claims and goodwill warranty claims that may be related to the alleged defect. Table 5-2 summarizes the Motors Insurance Corporation (MIC) and Universal Warranty Corporation (UWC) service contract claims for the subject vehicles that may be related to the alleged defect.

	Model Years					
Make/Model	1999	2000	2001	2002	2003	Total
Chevrolet Silverado	35	64	105	90	147	441
Chevrolet Tahoe	N/A	2	6	8	13	29
Chevrolet Suburban	N/A	5	12	10	4	31
Chevrolet Avalanche	N/A	N/A	N/A	0	4	4
GMC Sierra	29	39	31	31	43	173
GMC Yukon	N/A	0	1	3	7	11
GMC Yukon XL	N/A	0	1	1	3	5
Cadillac Escalade	N/A	N/A	N/A	7	10	17
Cadillac Escalade EXT	N/A	N/A	N/A	0	4	7
Total	64	110	156	150	235	715

Table 5-1 GM Regular Warranty and Goodwill Claims for the Subject Vehicles

	Model Years					
Make/Model	1999	2000	2001	2002	2003	Total
Chevrolet Silverado	44	103	130	70	93	440
Chevrolet Tahoe	N/A	5	3	6	11	25
Chevrolet Suburban	N/A	4	4	11	6	25
Chevrolet Avalanche	N/A	N/A	N/A	23	9	32
GMC Sierra	15	25	17	51	34	142
GMC Yukon	N/A	2	0	1	6	9
GMC Yukon XL	N/A	1	1	0	4	6
Cadillac Escalade	N/A	N/A	N/A	1	13	14
Cadillac Escalade EXT	N/A	N/A	N/A	3	0	3
Total	59	140	155	166	176	696

Table 5-2 MIC and UWC Service Contract Claims and MIC Goodwill Claims for the Subject Vehicles

The sources of the requested information and the last date the searches were conducted are tabulated in Table 5-3 below.

SOURCE SYSTEM	LAST DATE GATHERED
GART - Regular Warranty	04/20/2010
Motors Insurance Corporation (MIC) - Service Contract Claims	04/20/2010
Universal Warranty Corporation (UWC) - Service Contract Claims	06/04/2010

TABLE 5-3: DATA SOURCES

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

GM's warranty database does not contain the vehicle owner's name or telephone number. Some of the replacement part numbers; part descriptions and customer concern code descriptions are not included in the GM warranty database. GM is providing a field labeled "Verbatim Text". 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. 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 the GM warranty and goodwill claims, MIC/UWC service contract claims and MIC goodwill claims for the subject vehicles, including the information requested in 5(a-k), is provided on the Att_1_GM disk in the 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.

To search for and collect the warranty data for this response, the GM Global Analysis and Reporting Tool (GART-regular warranty) regular warranty database and the Motors Insurance Corp (MIC) service contract claims database were searched using the labor codes that may be related to the alleged defect. Those labor codes are listed in Table 6-1. Universal Warranty Corporation (UWC) does not use labor codes or trouble codes.

LABOR CODE	DESCRIPTION:
H0799	Pipe, Brake - Repair
H0810	Pipe, Brake - Master Cyl To Modulator Valve - Replace
H0812	Pipe, Brake - Master Cyl To Abs Modulator Valve - Front
H0813	Pipe, Brake - Master Cyl To Abs Modulator Valve - Rear
H0815	Pipe, Brake - ABS Modulator Valve To Junction Block - R
H0816	Pipe, Brake - ABS Modulator Valve To Wheel - Right Front
H0822	Pipe, Brake - Master Cyl To Combination Valve - Front -
H0823	Pipe, Brake - Master Cyl To Combination Valve - Rear -
H0859	Pipe, Brake - ABS Modulator Valve To Rear Hose - Replace
H0860	Pipe, Brake - Combination Valve To Front Wheel - Right
H0861	Pipe, Brake - Combination Valve To Front Wheel - Left -
H0890	Pipe, Brake - Front To Rear - Replace
H0910	Pipe, Brake - Axle Housing Junction Block To Rear Wheel
H0911	Pipe, Brake - Axle Housing Junction Block To Rear Wheel
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 SEARCH

GM included claims with trouble/problem cause codes and customer complaint codes or a verbatim that may be related to the alleged defect. If a verbatim indicated that the issue was unrelated to steel brake line corrosion failures the record was not included. GM lists the trouble/problem cause codes in Table 6-2 and customer complaint codes in Table 6-3, that are included within the labor codes listed in Table 6-1 that may relate to the alleged defect.

TROUBLE CODE	DESCRIPTION:
1019	Surface (Exterior)-Corrosion
1D	Broken
1J	Collapsed
1K	Cracked
1W	Condensation-Moisture
1Y	Foreign Material
2E	Clearance-Excessive
2F	Clearance-Too Tight
2K	Improperly Sealed
2L	Incorrect Pressure
2N	Insufficient Lubrication
2P	Insufficient Sealant
2T	Incorrect Torque
2W	Loose
3019	Rotating Part-Corrosion
3R	Porosity
3Z	Ruptured
4019	Interface (Gasket; Seal; Hose; Weld..)-Corrosion
4061	Interface (Gasket; Seal; Hose; Weld..)-Leaks
4Q	Weak
4X	Worn
5051	Fastener-Worn/Stripped
5R	Paint-Primer Shows Through
5W	Rusted/Corroded
6017	Module/Component-Broken
6019	Module/Component-Corrosion
6061	Module/Component-Leaks
6C	Component-Inoperative
6J	Connector-Corroded
98	Customer Satisfaction
OB	OBDII Code Used

TABLE 6-2 TROUBLE CODES USED IN WARRANTY SEARCH

CUSTOMER COMPLAINT CODE	DESCRIPTION:
124	Drivability - Brakes
AV	Unusual Gage Reading
MJ	Customer Satisfaction
O2	Spongy
OA	Binds
OF	Engage/Disengage
OG	Excess Effort
OJ	Inoperative
OO	Low Pedal
OQ	Pulls/Grabs
OR	Pulsates
V3	Smoke/Steam
VB	Broken
VD	Corrosion
VK	Fit
VL	Flutter
VN	Leak/Leaks
VO	Low Fluid
VV	Peeling
VW	Pitted
WA	ABS Brake Light
WB	Brake Light
WG	Service Engine Soon
WT	Traction Control Light

TABLE 6-3 CUSTOMER COMPLAINT CODES USED IN WARRANTY SEARCH

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.

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. However, per the extended service contracts, brake line replacement due to corrosion is not covered.

The number of extended service contracts on the subject vehicles that have been sold by MIC as of March 26, 2010 and UWC as of June 4, 2010 regardless of status (in-force, expired, cancelled) is contained in Tables 6-4 and 6-5.

	Model Years					
Make/Model	1999	2000	2001	2002	2003	Total
Chevrolet Silverado	109,813	164,586	161,141	158,836	160,783	754,664
Chevrolet Tahoe	N/A	22,426	68,380	7,3248	80,264	244,318
Chevrolet Suburban	N/A	26,749	51,431	47,724	48,740	174,644
Chevrolet Avalanche	N/A	N/A	N/A	45,754	31,238	76,992
GMC Sierra	35,718	54,686	50,030	50,650	51,707	242,791
GMC Yukon	N/A	11,225	24,765	27,281	35,311	98,582
GMC Yukon XL	N/A	10,035	23,725	24,286	28,570	86,616
Cadillac Escalade	N/A	N/A	N/A	12,864	11,733	24,597
Cadillac Escalade EXT	N/A	N/A	N/A	28,633	2,739	5,602
Total	145,036	289,707	379,472	443,506	451,085	1,708,806

Table 6-4 Subject Vehicles - MIC Extended Service Coverage Contracts Sold (Regardless of Status; In-Force, Expired, Cancelled)

	Model Years					
Make/Model	1999	2000	2001	2002	2003	Total
Chevrolet Silverado	76,591	192,374	233,217	211,335	224,685	938,202
Chevrolet Tahoe	0	72,605	140,120	121,915	121,745	456,385
Chevrolet Suburban	0	72,589	122,808	100,066	94,842	390,305
Chevrolet Avalanche	0	0	0	77,980	47,498	125,478
GMC Sierra	84,125	142,538	105,967	100,570	88,103	521,303
GMC Yukon	0	39,701	56,449	52,625	50,426	199,201
GMC Yukon XL	0	26,782	54,704	42,872	45,431	169,789
Cadillac Escalade	0	0	0	32,097	22,509	54,606
Cadillac Escalade EXT	0	0	0	8,325	6,456	14,781
Total	160,716	546,589	713,265	747,785	701,695	2,870,050

Table 6-5 Subject Vehicles - UWC Extended Service Coverage Contracts Sold (Regardless of Status; In-Force, Expired, Cancelled)

7. **Produce copies of all service, warranty, and other documents that relate to, or may relate to, the alleged defect in the subject vehicles, that GM has issued to any dealers, regional or zone offices, field offices, fleet purchasers, or other entities. This includes, but is not limited to, bulletins, advisories, informational documents, training documents, or other documents or communications, with the exception of standard shop manuals. Also include the latest draft copy of any communication that GM is planning to issue within the next 120 days.**

   GM has not issued any service, warranty or other documents to dealers, regional or zone offices, regarding the subject component that may relate to the subject condition in the subject vehicles.

   General Motors is not planning to issue in the next 120 days, any service, warranty or other technical documents or communications to its dealers, regional offices, zone offices or other entities regarding the subject condition in the subject vehicles.

   The preceding information was collected from GM Service Operations. The data collection was completed on April 27, 2010.

* * *

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 past and present officers and employees, whether assigned to its principal offices or any of its field or other locations, including 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 January 1, 1994, 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,

Gay P. Kent,
Director, Product Investigations
and Safety Regulations

Attachments

FW: Extension Request PE10-010
Stephen.McHenry
to:
dale.a.furney
05/27/2010 08:18 AM
Cc:
Jeff.Quandt, Chris.Lash, Valencia.Johnson
Show Details

Dale,

Acting for Jeff Quandt I approve the request for an extension of the response due date of July 2, 2010.

Stephen McHenry
Investigator, US D.O.T.
National Highway Traffic Safety Administration
Office of Defects Investigation
NVS-213 Room W48-308
1200 New Jersey Ave., SE
Washington D.C. 20590-0001
202.366.4883 or 1.877.536.8368 x-64883
Fax 202.366.3171

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From: dale.a.furney@gm.com [mailto:dale.a.furney@gm.com]
Sent: Thursday, May 27, 2010 8:13 AM
To: Quandt, Jeff (NHTSA)
Cc: Lash, Chris (NHTSA)
Subject: Extension Request PE10-010

Jeff,

As a follow-up to my voice mail on Tuesday, I am requesting an extension to the due date for NHTSA Information Request, PE10-010 (C/K brake lines). The current due date is June 18, 2010 and we are requesting an extension to make the new due date July 2, 2010.

Can you please reply to this e-mail to confirm that the new due date of July 2, 2010 is acceptable.

Thanks

Dale Furney

General Motors
Product Investigations

Nothing in this message is intended to constitute an electronic signature unless a specific statement to the contrary is included in this message.

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