



GENERAL MOTORS LLC
Global Interior and Safety Center

April 29, 2011

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

N100425 Partial

NVS-213cml
RQ10-004

Dear Mr. Quandt:

This letter is General Motors' (GM) partial response to your Recall Query (RQ), received on February 17, 2011 to investigate allegations of electric power steering (EPS) system failure in model year (MY) 2004 through 2007 Saturn ION vehicles manufactured by General Motors (GM) for sale in the United States, and to request certain information about these vehicles and similarly equipped peer vehicles.

As agreed upon in your email of March 24, 2011, this second partial response contains the responsive information for all legal claims for the subject and peer vehicles. GM will provide the additional reports when it responds to the remaining questions regarding the subject and peer vehicles. The remainder of the response for RQ10-004 will be provided by the dates agreed upon in your email. Also as agreed, GMs' responses will not include the Chevrolet Cobalt and the Pontiac G5. This response includes only additional legal claims not previously included in GM's response to PE10-005 sent April 14, 2010.

Your questions and our corresponding replies are as follows:

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 and peer vehicles:**
 - a. **Consumer complaints, including those from fleet operators;**
 - b. **Consumer complaints, including those from operators, where a failure or malfunction of the EPS system was reported;**
 - c. **Field reports, including dealer field reports;**
 - d. **Field reports, including dealer field reports where EPS failure was claimed;**
 - e. **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;**
 - f. **Property damage claims;**



- g. Third-party arbitration proceedings where GM is or was a party to the arbitration; and**
- h. Lawsuits, both pending and closed, in which GM is or was a defendant or codefendant.**

For subparts "a" through "f" 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 "e" through "h," 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 g and h, 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.

As agreed, we are responding to subsections e-h where they relate to legal claims. Table 2-1 below summarizes records that may relate to allegations of loss of power assist during vehicle operation in the subject vehicles. Table 2-2 below summarizes records that may relate to allegations of loss of power assist during vehicle operation in peer vehicles.

As agreed, we are identifying those complaints that contain a description or facts that relate to the loss of steering power assist (items marked "A" in the "Reviewed" column) in the attachment "Q_03_REQUEST NUMBER TWO DATA" or contain a description or facts that make it uncertain if the complaint relates to the loss of power steering assist (items marked "B" in the "Reviewed" column) in the attachment "Q_03_REQUEST NUMBER TWO DATA". In addition, GM has provided a column labeled "GM Assessment" containing an assessment of these complaints. Some of the complaints marked "B" in the "Reviewed" column of the attachment contain facts that are not consistent with a loss of steering power assist even though the original allegation makes that claim (two such complaints involved fatalities). These additional records are not included in Table 2-1 or 2-2, but are included in "Q_03_REQUEST NUMBER TWO DATA".

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
Not-In-Suit Claims	24	1	21	24	15
Subrogation Claims	1	0	1	1	1
Third Party Arbitration Proceedings	0	0	0	0	0
Product Liability Lawsuits	0	0	0	0	0
Total Reports	25	1	22	25	16

TABLE 2-1: REPORT CLASSIFICATION - ALLEGATIONS LOSS OF POWER ASSIST DURING VEHICLE OPERATION IN SUBJECT VEHICLES

Type of Report	GM Reports	Subcategories			
		Corresponding to NHTSA Reports	Number with Property Damage	Number with Crash	Number with Injuries
Not-In-Suit Claims	93	0	84	91	42
Subrogation Claims	2	0	2	2	0
Third Party Arbitration Proceedings	0	0	0	0	0
Product Liability Lawsuits	1	0	1	1	1
Total Reports	96	0	87	94	43

TABLE 2-2: REPORT CLASSIFICATION - ALLEGATIONS OF LOSS OF POWER ASSIST DURING VEHICLE OPERATION IN PEER VEHICLES

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
Legal/Employee Self Insured Services (ESIS)/Product Liability Claims/Lawsuits	4 Mar 2011

TABLE 2-3: 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;**
- e. **Whether any warning lights or sounds were illuminated or heard at the time the alleged defect occurred;**
- f. **Whether the vehicle was towed into the dealership;**
- g. **Whether the driver was able to restart the vehicle, and reset the EPS system;**
- h. **If the EPS was reset, did the failure occur more than once;**
- i. **Diagnostic Trouble Code(s) (DTCs) indicated at the time of repair;**
- j. **Repair(s) dealer made to the vehicle;**
- k. **Whether a crash is alleged;**
- l. **Whether property damage is alleged;**
- m. **Number of alleged injuries;**
- n. **Number of alleged fatalities; and**
- o. **A summary of the incident.**

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 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".

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 question 2. Some incident reports may not contain sufficient reliable information to accurately assess cause.

16. Provide the following information regarding the effect of the alleged defect on steering effort and vehicle control in the subject and peer vehicles:

- a. **Steering effort as a function of lateral acceleration for normal system operation and after EPS failure;**
- b. **Copies of all system test standards associated with steering effort/feel with normal operation and after a system failure;**
- c. **Copies of all studies, reports or related material associated with each of the following for the subject vehicles or any other vehicles: (1) driving steering effort capability (for the full range from 5th to 95th percentile male and female drivers); and (2) ergonomic/human factors analyses of driver reactions to sudden changes in steering effort; and**
- d. **Provide a table showing GM's assessment of each of the crash complaints provided with this letter and in GM's response material, including incident speed, road conditions, traffic conditions, description of the steering maneuver attempted, the approximate lateral acceleration, the driver's description of the effect on steering performance/effort, and GM's assessment of the crash severity and all causal factors.**

16 d

In some cases GM investigated claims/reports of crashes that allege loss of power steering assist. In other cases, GM did not perform an investigation, but the available facts indicate that the vehicle was travelling at speeds in the range of 30 mph or greater. GM believes that if power assist is lost while a vehicle is moving at speeds in the range of 30 mph or greater there is a small difference in steering efforts perceived in subjective evaluations at these speeds and it is unlikely to lead to loss of vehicle control. GM's assessment of claims/reports is listed in the column entitled "GM Assessment" in the Microsoft Access 2000 file labeled "Q_03_REQUEST NUMBER TWO DATA." Refer to the attachments for question 3 that may provide facts or information to support GM's assessment.

* * *

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.

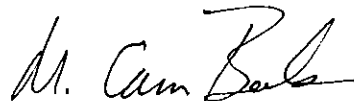
This response is based on searches of General Motors LLC (GM) locations where documents determined to be responsive to your request would ordinarily be found. As a result, the scope of this search did not include, nor could it reasonably include, "all of its past and present officers and employees, whether 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), in or after January 1, 2002, who 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), analyses, 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