



GENERAL MOTORS LLC
Global Interior and Safety Center

January 20, 2012

Jeffrey L. Quandt, Chief
Vehicle Control Division
Office of Defects Investigation
National Highway Traffic Safety Administration
1200 New Jersey Ave, SE, Room W48-307
Washington, DC 20590

N100425

NVS-213cml
RQ10-004 Supplement 2
(EA11-014)

Dear Mr. Quandt:

This letter supplements General Motors' (GM) May 20, 2011, partial response to your Recall Query (RQ10-004), received on February 17, 2011, regarding allegations of electric power steering (EPS) system failure in model year (MY) 2004 through 2007 Saturn ION vehicles manufactured by GM for sale in the United States.

On September 29, 2011, the Office of Defect Investigations (ODI) opened Engineering Analysis EA11-014 to further assess the frequency, scope and safety consequences of a sudden loss of steering assist in the subject vehicles.

This letter responds to your December 6, 2011, verbal request that GM update our May 20, 2011, response to items 2 through 5 of RQ10-004. The subject vehicles for this Supplement 2 response are MY 2004 through 2007 Saturn ION vehicles sold or leased in the United States.

This response includes only additional reports and claims for subject vehicles not previously included in GM's partial response to RQ10-004 sent on May 20, 2011.

Your requests 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.

Table 2-1 below summarizes records that may relate to allegations of loss of power assist during vehicle operation 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.

Also included in this access database are additional owner reports that resulted from reimbursements that are not included in Table 2-1. For owners to be reimbursed, they are required to file an owner report by calling the GM Customer Assistance Center (CAC). Those records are designated by a check in the box in the "Reimbursement" column in the database. In addition, for each of these reimbursement records, there is also a corresponding warranty claim that is included in the response to question 5.

We are identifying those complaints that contain a description or facts that relate to the loss of power steering 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".

TYPE OF REPORT	GM REPORTS	SUBCATEGORIES			
		CORRESPONDING TO NHTSA REPORTS	NUMBER WITH PROPERTY DAMAGE	NUMBER WITH CRASH	NUMBER WITH INJURIES/FATALITIES
Owner Reports	1,726	45	1	8	5/0
Field Reports	13	0	0	0	0/0
Not-In-Suit Claims	3	0	1	3	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)	1,742	45	2	11	8/0
Total Vehicles with Reports (Unique VIN)	1,728	45	1	8	5/0

TABLE 2-1: REPORT CLASSIFICATION – ALLEGATIONS OF LOSS OF POWER ASSIST DURING VEHICLE OPERATION IN SUBJECT 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
Customer Assistance Center	9 DEC 11
Technical Assistance Center	8 DEC 11
Legal/Employee Self Insured Services (ESIS)/Product Liability Claims/Lawsuits	7 DEC 11

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 any warning lights or sounds were illuminated or heard at the time the alleged defect occurred;
 - j. Whether the vehicle was towed into the dealership;
 - k. Whether the driver was able to restart the vehicle, and reset the EPS system;
 - l. If the EPS was reset, did the failure occur more than once;
 - m. Diagnostic Trouble Code(s) (DTCs) indicated at the time of repair;

- n. **Repair(s) dealer made to the vehicle;**
- o. **Whether a crash is alleged;**
- p. **Whether property damage is alleged;**
- q. **Number of alleged injuries;**
- r. **Number of alleged fatalities; and**
- s. **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 2007 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 request 2. Some incident reports may not contain sufficient reliable information to accurately assess cause.

- 5. State, by model and model year, total counts for all of the following categories of claims, collectively, that have been paid by GM to date that relate to repair or replacement of the subject system in the subject and peer vehicles: warranty claims; extended warranty claims; claims for good will services; and field, zone, or similar adjustments and reimbursements. This should include all claims made in accordance with procedures specified in any service bulletins issued by GM related to the subject components.**

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. Whether there was a claim for towing within three days before or after the subject claim (yes/no);
- h. Whether there is any other reference to towing in the claim (yes/no);
- i. Labor operation number;
- j. Problem code;
- k. Diagnostic Trouble Code(s) (DTCs) indicated at the time of repair;
- l. Replacement part number(s) and description(s);
- m. Concern stated by customer;
- n. Comment, if any, by dealer/technician relating to claim and/or repair; and
- o. GM's assessment of whether the claim was associated with an EPS failure while driving.

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.

For the subject vehicles, the regular warranty and goodwill warranty claims with allegations of loss of power assist during vehicle operation are summarized by model and model year in Table 5-1. MIC extended service contract claims with allegations of loss of power assist during vehicle operation are summarized by model and model year in Table 5-2. The UWC extended service contract claims with allegations of loss of power assist during vehicle operation are summarized by model and model year in Table 5-3. A summary of all warranty claims, including those with allegations of noise, drivability, and other issues and the information requested in 5(a-o), is provided on the ATT_1_GM disk; folder labeled "Q_05": refer to the Microsoft Access 2007 file labeled "Q_05_WARRANTY DATA".

MAKE	MODEL	2004MY	2005MY	2006MY	2007MY	TOTAL
Saturn	ION	1,327	1,463	3,309	3,973	10,072

TABLE 5-1 REGULAR WARRANTY CLAIMS WITH ALLEGATIONS OF LOSS OF POWER ASSIST DURING VEHICLE OPERATION FOR SUBJECT VEHICLES

MAKE	MODEL	2004MY	2005MY	2006MY	2007MY	TOTAL
Saturn	ION	0	0	0	9	9

TABLE 5-2 MIC EXTENDED SERVICE CONTRACT CLAIMS WITH ALLEGATIONS OF LOSS OF POWER ASSIST DURING VEHICLE OPERATION FOR SUBJECT VEHICLES

MAKE	MODEL	2004MY	2005MY	2006MY	2007MY	TOTAL
Saturn	ION	2	0	1	1	4

TABLE 5-3 UWC EXTENDED SERVICE CONTRACT CLAIMS WITH ALLEGATIONS OF LOSS OF POWER ASSIST DURING VEHICLE OPERATION FOR SUBJECT VEHICLES

The sources of the requested information and the last date the searches were conducted are tabulated in Table 5-4 below.

SOURCE SYSTEM	LAST DATE GATHERED
GART - regular warranty	8 DEC 11
MIC - extended service contract claims	9 DEC 11*
UWC - extended service contract claims	7 DEC 11

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 item 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. 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 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 2007 file labeled "Q_05_WARRANTY DATA".

*MIC data provided up to 23 SEP 11

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.

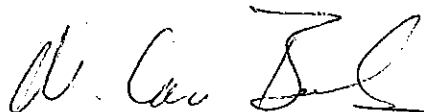
This response is based on searches of General Motors LLC (GM) locations where documents determined to be responsive to your request would ordinarily be found. As a result, the scope of this search did not include, nor could it reasonably include, "all of its past and present officers and employees, whether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