



U.S. Department  
of Transportation  
**National Highway  
Traffic Safety  
Administration**

1200 New Jersey Avenue SE  
Washington, DC 20590

**FEB 08 2011**

**Via Certified Mail**

Mr. Richard W. Paige  
Designated Agent for IEE S.A.  
Bush Seyferth & Paige PLLC  
3001 West Big Beaver Rd #600  
Troy, MI 48084

NVS-215aa  
EQ11-001  
10V-644

**Subject: Request for List of Purchasers**

Dear Mr. Paige:

The Office of Defects Investigation (ODI), Recall Management Division (RMD) is conducting a review of safety recall 10V-644. In a letter dated December 17, 2010, General Motors (GM) notified the NHTSA that it had decided certain 2005 – 2007 model year Cadillac CTS vehicles contain a safety related defect. GM stated that certain CTS vehicles contain a Passenger Sensing System mat, manufactured by IEE, in the front passenger seat that may flex causing the mat to kink, bend or fold. If this flexing causes the connections in the mat to break, the passenger airbag could become disabled. Non-deployment of the front passenger air bag in the event of a crash necessitating that air bag's deployment may reduce protection of the passenger and increase the risk or severity of injury to them. NHTSA assigned recall number 10V-644 to this matter.

The purpose of this request is to obtain a list of purchasers that were sold this equipment so they are made aware of this safety recall and are able to determine the need for any similar safety recall. Accordingly, we require the following information:

1. Provide a list of all IEE customers that received the same or similar equipment and provide their company name, line of business (i.e. vehicle manufacturer, equipment manufacturer, distributor, etc.), address, phone number, contact person, quantity sold to each, and sale date. For any such customers, please also explain why or what about the equipment is the same or similar (e.g., same design specifications, etc.) as distinguished from other sensing system mats IEE may have manufactured either for GM or other customers.



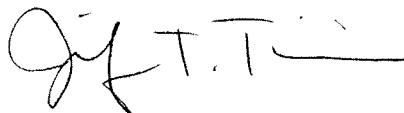
2. For each listed customer in response to the first question, provide the year, make and model of each motor vehicle the equipment was intended to be installed into by the vehicle manufacturer, to the extent IEE has this information. For customers not intending to use the equipment as original equipment installed in a motor vehicle, please note their intended use if known.

You must respond in writing to this letter. This letter is being sent to IEE pursuant to 49 U.S.C. § 30166, which authorizes NHTSA to conduct any investigation that may be necessary to enforce Chapter 301 of Title 49. IEE's failure to respond promptly and fully to this letter could subject Norcold to civil penalties pursuant to 49 U.S.C. § 30165 or lead to an action for injunctive relief pursuant to 49 U.S.C. § 30163.

If your company claims that any of the information or documents provided in response to this information request constitutes confidential commercial material within the meaning of 5 U.S.C. § 552(b)(4), or are protected from disclosure pursuant to 18 U.S.C. § 1905, your company must submit supporting information together with the materials that are the subject of the confidentiality request, in accordance with 49 CFR Part 512, as amended (69 Fed. Reg. 21409 et seq; April 21, 2004), to the Office of Chief Counsel (NCC-111), National Highway Traffic Safety Administration, Room W41-227, 1200 New Jersey Avenue, S.E., Washington, D.C. 20590. Your Company is required to submit two copies of the documents containing allegedly confidential information (except only one copy of blueprints) and one copy of the documents from which information claimed to be confidential has been deleted. Please remember that the word "CONFIDENTIAL" must appear at the top of each page containing information claimed to be confidential, and the information must be clearly identified in accordance with 5 U.S.C. § 512.6.

IEE's written response must be submitted to this office within 10 days of receiving this letter. In your response, please be certain to include a reference to this matter's identification number which is **EQ11-001**. If you have any questions concerning this matter, please contact Alex Ansley of my staff at (202) 493-0481 or by e-mail at [alexander.ansley@dot.gov](mailto:alexander.ansley@dot.gov). Response submission may be made by US Mail, fax (202) 366-7882, or e-mail [rmd.odi@dot.gov](mailto:rmd.odi@dot.gov).

Sincerely,

A handwritten signature in black ink, appearing to read "J.T.T.", with a horizontal line extending to the right.

Jennifer T. Timian  
Chief, Recall Management Division  
Office of Defects Investigation  
Enforcement

Enclosure



GENERAL MOTORS LLC  
Global Interior and Safety Center

10V-644  
(3 Pages)

December 17, 2010

Mr. Claude Harris  
Acting Associate Administrator for Enforcement  
National Highway Traffic Safety Administration  
Recall Management Division (NVS-215)  
1200 New Jersey Avenue, SE – Room W45-306  
Washington, D.C. 20590

Dear Mr. Harris:

The following information is submitted pursuant to the requirements of 49 CFR 573.6 as it applies to a determination by General Motors to conduct a safety related recall for certain 2005-2007 model year Cadillac CTS vehicles.

573.6(c)(1): Cadillac Brand of General Motors LLC

573.6(c)(2)(3)(4): This information is shown on the attached sheet.

573.6(c)(5): General Motors has decided that a defect, which relates to motor vehicle safety, exists in certain 2005-2007 model year Cadillac CTS vehicles. Some of these vehicles have a condition in which repeated flexing of the Passenger Sensing System mat in the front passenger seat may cause the mat to kink, bend, or fold. This flexing can break the connections in the mat. If this occurs, the front passenger airbag could become disabled. If the airbag becomes disabled, the passenger airbag status indicator on the rearview mirror will show that the airbag is off, the AIR BAG indicator will be illuminated, and a SERVICE AIR BAG message will appear in the Driver Information Center. In the event of a crash severe enough to activate the front passenger airbag, if the airbag does not deploy, it could result in increased injury for the occupant.

573.6(c)(6): On September 8, 2010, the Office of Defects Investigation (ODI) of the National Highway Traffic Safety Administration (NHTSA) opened a Comprehensive Inquiry (CI) 10-002 to gather additional information regarding model year (MY) 2007 Cadillac CTS vehicles manufactured by General Motors. Specifically, ODI requested further information related to the data provided by GM in its Early Warning Reporting (EWR) submissions for the First Quarter of 2007 through the Second Quarter of 2010 relating to component 14 – Air Bags. Upon further investigation, GM Product Investigations found that many of the claims submitted relating to EWR component Airbags – 14, were related to labor code C8870, “inflatable restraint passenger seat suppression module, replace”.



From September 2010 to December 2010, GM Product Investigations investigated this issue through statistical warranty and returned warranty parts analysis to aid in an understanding of root causes and failure mechanisms.

The issue was presented to the Field Performance Evaluation Review Committee and on December 13, 2010, the Executive Field Action Decision Committee decided to conduct a safety recall.

573.6(c)(8): Dealers are to replace the Passenger Sensing System.


GM will provide the dealer bulletin and owner letter mail dates when available.

Pursuant to 577.11(e), GM will provide reimbursement to owners for repairs completed on or before ten days after the owner mailing is completed, according to the plan submitted on January 22, 2009.

573.6(c)(10): GM will provide the dealer bulletin and owner letter when available.

In addition, owners of certain other 2005-2007 model year Cadillac CTS vehicles outside the recall population that have significantly lower incident rates will be provided a special coverage. Under this special coverage, if this issue were to occur, GM will repair the vehicle free of charge up to 10 years or 120,000 miles.

Sincerely,

A handwritten signature in black ink, appearing to read "M. Carmen Benavides". The signature is fluid and cursive, with a large, stylized "B" at the end.

M. Carmen Benavides  
Director, Product Investigations  
and Safety Regulations

N100355  
Attachment

573.6(c)(2)(3)(4)

VEHICLES POTENTIALLY AFFECTED BY MAKE, MODEL, AND MODEL YEAR  
PLUS INCLUSIVE DATES OF MANUFACTURE

<u>MAKE</u>	<u>MODEL SERIES</u>	<u>MODEL YEAR</u>	<u>NUMBER INVOLVED</u>	<u>INCLUSIVE MANUFACTURING DATES</u>		<u>DESCRIPTIVE INFO. TO PROPERLY IDENT. VEH.</u>	<u>EST. NO. W/CONDITION</u>
				<u>(FROM)</u>	<u>(TO)</u>		
Cadillac	D	2005	16,719	12/08/2003	06/03/2005	CTS	*
Cadillac	D	2006	46,070	06/03/2005	05/05/2006	CTS	"
Cadillac	D	2007	33,138	03/07/2006	02/16/2007	CTS	"
GM Total:			95,927				

\* All involved vehicles will be corrected as necessary.

573.6(c)(2)(iv): The Passenger Presence Sensor Mat was manufactured by IEE.

IEE  
Richard W. Paige  
3001 West Big Beaver Road #600  
Troy, MI 48064  
(248) 822-7804

N100355