



U.S. Department
of Transportation

National Highway
Traffic Safety
Administration

1200 New Jersey Avenue, SE
Washington, DC 20590

JUL 1 - 2011

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Ms. Carmen Benavides
Director, Product Investigations
Structure & Safety Integration
General Motors Corporation
30001 Van Dyke - Mail Code 480-210-G11
Warren, MI 48090-9055

NVS-212llh
EA11-006

Dear Ms. Benavides:

On May 4, 2011, the National Highway Traffic Safety Administration (NHTSA) opened Engineering Analysis 11-006 to investigate allegations of failure of the straps securing the fuel tank to the frame on model year ("MY") 1997-2001 Ford F-150 pickup trucks ("subject vehicles") manufactured by Ford Motor Company. As part of that investigation, we are requesting "peer vehicle" information from General Motors Corporation (GM).

If the strap(s) (or other connecting hardware) fails, the fuel tank could drop, possibly resulting in a fuel leak from the tank or related components. Leaking fuel presents a fire hazard. Other possible consequences of the attachment failure could be damage to other components due to contact by the loosened tank, or a completely detached tank presenting a hazard to following traffic.

Unless otherwise stated in the text, the following definitions apply to these information requests:

- **Subject peer vehicles:** All MY 1997-2004 GM 1500 series light duty full-size pickup trucks manufactured for sale or lease in the United States.
- **Subject components:** The strap(s) (or other devices) used to secure the fuel tank to the vehicle), along with associated hardware and components.
- **Alleged condition:** Corrosion of the straps or other hardware that support the fuel tank, breaking of one or more of the straps or other hardware that support the fuel tank, dropping of the fuel tank, and/or detachment of the fuel tank from the vehicle.
- **GM:** General Motors Corporation, all of its past and present officers and employees, whether assigned to their principal offices or any of its field or other locations, including all of their 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 were involved in any way with any of the following related to one or more of the subject components in the peer vehicles or to the subject condition in the peer 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.

- **Document:** "Document(s)" is used in the broadest sense of the word and shall mean all original written, printed, typed, recorded, or graphic matter whatsoever, however produced or reproduced, of every kind, nature, and description, and all non-identical copies of both sides thereof, including, but not limited to, papers, letters, memoranda, correspondence, communications, electronic mail (e-mail) messages (existing in hard copy and/or in electronic storage), faxes, mailgrams, telegrams, cables, telex messages, notes, annotations, working papers, drafts, minutes, records, audio and video recordings, data, databases, other information bases, summaries, charts, tables, graphics, other visual displays, photographs, statements, interviews, opinions, reports, newspaper articles, studies, analyses, evaluations, interpretations, contracts, agreements, jottings, agendas, bulletins, notices, announcements, instructions, blueprints, drawings, as-builts, changes, manuals, publications, work schedules, journals, statistical data, desk, portable and computer calendars, appointment books, diaries, travel reports, lists, tabulations, computer printouts, data processing program libraries, data processing inputs and outputs, microfilms, microfiches, statements for services, resolutions, financial statements, governmental records, business records, personnel records, work orders, pleadings, discovery in any form, affidavits, motions, responses to discovery, all transcripts, administrative filings and all mechanical, magnetic, photographic and electronic records or recordings of any kind, including any storage media associated with computers, including, but not limited to, information on hard drives, floppy disks, backup tapes, and zip drives, electronic communications, including, but not limited to, the Internet and shall include any drafts or revisions pertaining to any of the foregoing, all other things similar to any of the foregoing, however denominated by GM, any other data compilations from which information can be obtained, translated if necessary, into a usable form and any other documents. For purposes of this request, any document which contains any note, comment, addition, deletion, insertion, annotation, or otherwise comprises a non-identical copy of another document shall be treated as a separate document subject to production. In all cases where original and any non-identical copies are not available, "document(s)" also means any identical copies of the original and all non-identical copies thereof. Any document, record, graph, chart, film or photograph originally produced in color must be

provided in color. Furnish all documents whether verified by GM or not. If a document is not in the English language, provide both the original document and an English translation of the document.

- **Other Terms:** To the extent that they are used in these information requests, the terms "claim," "consumer complaint," "dealer field report," "field report," "fire," "fleet," "good will," "make," "model," "model year (MY)," "notice," "property damage," "property damage claim," "rollover," "type," "warranty," "warranty adjustment," and "warranty claim," whether used in singular or in plural form, have the same meaning as found in 49 CFR 579.4.

Please provide numbered responses to the following information requests. Please repeat the applicable request verbatim above each response. After GM's response to each request, identify the source of the information and indicate the last date the information was gathered.

1. Separately, for each model and model year subject peer vehicles, list and describe the subject components installed on the subject peer vehicles. The description shall include the materials composition of the fuel strap(s) or similar components, and platings/coatings (specific description of constituents, proportions and thicknesses), as well as bottom view drawings or illustrations of the subject component showing the locations of the fuel tank and strap(s) (or other securing device(s)), and their placement in relation to the frame and other components, including but not limited to, brake lines. Identify (name and address) of the suppliers of the subject components.
2. 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. Date warranty coverage commenced;
 - g. 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 2007, or a compatible format, entitled "PRODUCTION DATA."

3. 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 subject condition in the subject peer vehicles:
 - a. Consumer complaints;
 - b. Field reports, including dealer field reports;
 - c. Reports involving a crash, fire, 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. Property damage claims;
- e. Third-party arbitration proceedings where GM is or was a party to the arbitration; and
- f. Lawsuits, both pending and closed, in which GM is or was a defendant or codefendant.

For subparts "a" through "d" 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 "f," 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 "c through f" 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.

4. Separately, for each item (complaint, report, claim, notice, or matter) within the scope of your response to Request No. 3, state the following information:
 - a. GM's file number or other identifier used;
 - b. The category of the item, as identified in Request No. 3 (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 fuel tank strap (or other similar device used to secure the fuel tank to the vehicle) allegedly failed (separated), and if so;
 - i) Whether one, more than one, or all of the straps/devices failed;
 - ii) Whether the fuel tank allegedly contacted the roadway;
 - iii) Whether fuel leakage allegedly occurred;
 - iv) Whether the fuel tank allegedly separated from the vehicle;
 - j. Whether brake fluid leakage allegedly occurred (as a result of the subject condition);
 - k. Whether the report is duplicative of another report provided in this response;
 - l. Whether a crash is alleged;
 - m. Whether property damage is alleged;
 - n. Number of alleged injuries, if any; and
 - o. Number of alleged fatalities, if any.

Provide this information in Microsoft Access 2007, or a compatible format, entitled "REQUEST NUMBER THREE DATA."

5. Produce copies of all documents related to each item within the scope of Request No. 3. Organize the documents separately by category (i.e., consumer complaints, field reports, etc.) and describe the method GM used for organizing the documents.

If GM cannot respond to any specific request or subpart(s) thereof, please state the reason why it is unable to do so. If on the basis of attorney-client, attorney work product, or other privilege, GM does not submit one or more requested documents or items of information in response to this information request, GM must provide a privilege log identifying each document or item withheld, and stating the date, subject or title, the name and position of the person(s) from, and the person(s) to whom it was sent, and the name and position of any other recipient (to include all carbon copies or blind carbon copies), the nature of that information or material, and the basis for the claim of privilege and why that privilege applies.

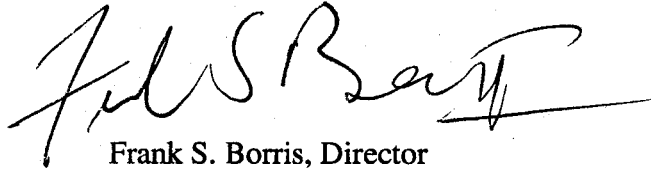
GM's response to this letter, in duplicate, together with a copy of any confidentiality request, must be submitted to this office by July 25, 2011. **All business confidential information must be submitted directly to the Office of Chief Counsel as described in the following paragraph and should not be sent to this office.** In addition do not submit any business confidential information in the body of the letter submitted to this office. Please refer to EA11-006 in GM's response to this letter and in any confidentiality request submitted to the Office of Chief Counsel. If GM finds that it is unable to provide all of the information requested within the time allotted, GM must request an extension from me at (202) 366-0139 no later than five business days before the response due date. If GM is unable to provide all of the information requested by the original deadline, it must submit a partial response by the original deadline with whatever information GM then has available, even if an extension has been granted.

If GM claims that any of the information or documents provided in response to this information request constitute 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, GM 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 W41-326, 1200 New Jersey Avenue, S.E., Washington, D.C. 20590. GM 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.

Please send email notification to Lawrence L. Hershman (larry.hershman@dot.gov) and to ODI_IRresponse@dot.gov when GM sends its response to this office and indicate whether there is confidential information as part of GM's response.

If you have any technical questions concerning this matter, please call Lawrence L. Hershman of my staff, at (202) 366-4929.

Sincerely,

A handwritten signature in black ink, appearing to read "F. S. Borris". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Frank S. Borris, Director
Office of Defects Investigation
Enforcement