



GENERAL MOTORS LLC  
Global Interior and Safety Center

August 8, 2011

Frank Borris, Director  
Office of Defects Investigation Enforcement  
National Highway Traffic Safety Administration  
1200 New Jersey Ave., SE, Room W46-302  
Washington, D.C. 20590

N110207

NVS-212IIIh  
EA11-006

Dear Mr. Borris:

This letter is General Motors (GM) response to your request for peer vehicle information from GM received on July 1, 2011, as part of your investigation of allegations of failure of the straps securing the fuel tank to the frame on model year (MY) 1997-2001 Ford F-150 pickup trucks manufactured by Ford Motor Company (EA11-006).

The GM peer vehicles for which GM is providing information are the 1997-2004 MY Chevrolet Silverado and GMC Sierra 1500 series light duty full-size pickup trucks manufactured for sale or lease in the United States. Per GM's discussion with Scott Yon of the NHTSA on July 18, 2011, GM is providing reports that may be related to the subject condition of fuel tank strap separation due to corrosion.

Your requests and our corresponding replies are as follows:

- 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.**

The 1997-1999 MY GMT400 light duty pickup trucks used 2 straps per tank. They were manufactured from steel which was hot dipped galvanized and had an additional paint coating. The 1999-2004 MY GMT800 light duty pickup trucks also used 2 straps per tank. They were manufactured from steel which was hot dipped galvanized and had an additional paint or PVC coating. The GMT400 / GMT800 strap dimensions, material and coating details, including attaching hardware, are provided on the "ATT\_2\_GM\_CONF" disk in the folder labeled "Q\_01" along with views of the 1997-1999 MY GMT400 and 1999-2004 MY GMT800 fuel systems.



The fuel tank straps for all of the subject vehicles were supplied by R. Reininger & Son, Ltd, 1240 Twinney Dr., Newmarket, ON, Canada. General Motors is informed Reininger is now a part of Maple Stamping (a division of Magna), 401 Caldari Rd., Concord, Ontario, Canada L4K 5P1.

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."**

General Motors production information is retrieved through the Global Analysis Reporting Tool database (GART). The available information regarding the number of peer vehicles produced for sale or lease in the United States for the 1994-2007 MY are shown in Table 1.

| MODEL YEAR | CHEVROLET SILVERADO | GMC SIERRA |
|------------|---------------------|------------|
| 1997       | 397,304             | 130,720    |
| 1998       | 388,771             | 121,025    |
| 1999       | 425,167             | 142,924    |
| 2000       | 551,717             | 163,735    |
| 2001       | 441,720             | 126,335    |
| 2002       | 440,327             | 134,293    |
| 2003       | 490,622             | 128,439    |
| 2004       | 483,275             | 145,177    |
| TOTAL      | 3,618,903           | 1,092,648  |

TABLE 1 - GM PEER VEHICLE PRODUCTION

The GM production information requested in 2 a-g is provided on the "ATT\_1\_GM" disk in the folder labeled "Q\_02"; refer to the Microsoft Access 2007 file labeled, "Q\_02\_PRODUCTION DATA" for the 1997-2004 MY peer vehicles.

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.

Table 3-1 summarizes records that may relate to the subject condition in the subject peer vehicles. GM has organized the records by the GM file number within each attachment. Refer to access database "Q\_04\_REQUEST NUMBER THREE DATA" for categories prescribed by the NHTSA.

| TYPE OF REPORT                           | GM REPORTS | SUBCATEGORIES               |                   |                                 |                   |
|--|------------|-----------------------------|-------------------|---------------------------------|-------------------|
|  |            | NUMBER WITH PROPERTY DAMAGE | NUMBER WITH CRASH | NUMBER WITH INJURIES/FATALITIES | NUMBER WITH FIRES |
| Owner Reports                            | 18         | 0                           | 0                 | 0                               | 0                 |
| Field Reports                            | 0          | 0                           | 0                 | 0                               | 0                 |
| Not-In-Suit Claims                       | 0          | 0                           | 0                 | 0                               | 0                 |
| Subrogation Claims                       | 0          | 0                           | 0                 | 0                               | 0                 |
| Third Party Arbitration Proceedings      | 0          | 0                           | 0                 | 0                               | 0                 |
| Product Liability Lawsuits               | 0          | 0                           | 0                 | 0                               | 0                 |
| Total Reports (Including Duplicates)     | 18         | 0                           | 0                 | 0                               | 0                 |
| Total Vehicles with Reports (Unique VIN) | 18         | 0                           | 0                 | 0                               | 0                 |

TABLE 3-1: GM SUBJECT PEER VEHICLE - MAY RELATE TO SUBJECT CONDITION - REPORT CLASSIFICATION

In addition to the reports shown on Table 3-1, GM is also providing ten reports of fuel tank strap or mounting hardware separation, but no mention of corrosion. These reports may be found on the "ATT\_1\_GM" disk in the folder labeled "Q\_04"; refer to the Microsoft Access 2007 file labeled, "Q\_04\_REQUEST NUMBER THREE DATA" in the column labeled "Corrosion Not Reported".

To date, GM's investigation of the subject condition has not included an assessment of the cause(s) of each incident responsive to request 3. Some incident reports may not contain sufficient reliable information to accurately assess cause.

The search for responsive information for this request included all the peer vehicle model years, 1997-2004. The sources of the requested information and the last date the searches were conducted are tabulated in Table 3-2.

| SOURCE SYSTEM   | LAST DATE GATHERED |
|---|--------------------|
| Customer Assistance Center  | 7/12/11            |
| Technical Assistance Center   | 7/18/11            |
| Field Information Network Database (FIND)                                     | 7/14/11            |
| Field Product Report Database (FPRD)  | 7/18/11            |
| Company Vehicle Evaluation Program (CVEP)                                     | 7/15/11            |
| Captured Test Fleet (CTF)   | 7/15/11            |
| Early Quality Feedback (EQF)  | 7/15/11            |
| Legal/Employee Self Insured Services (ESIS)/Product Liability Claims/Lawsuits | 7/20/11            |

TABLE 3-2: DATA SOURCES

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."

The requested GM information is provided on the "ATT\_1\_GM" disk in the folder labeled "Q\_04"; refer to the Microsoft Access 2007 file labeled, "Q\_04\_REQUEST NUMBER THREE DATA". Some incident reports may not contain sufficient reliable information to accurately answer all parts of request 4.

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.

Copies of the records summarized in Table 3-1 are embedded in the file provided in "ATT\_1\_GM" disk; folder labeled "Q\_04"; refer to the Microsoft Access file labeled

"Q\_04\_REQUEST NUMBER THREE DATA". GM has organized the records by the GM file number within each attachment.

To date, GM's investigation of subject condition has not included an assessment of the cause(s) of each incident responsive to request 3. Some incident reports may not contain sufficient reliable information to accurately assess cause.

\* \* \*

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 divisions, subsidiaries (whether or not incorporated) and affiliated enterprises and all of 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, on or after July 1, 1992, were involved in any way with any of the following related to the potential 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.

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Please contact me if you require further information about this response or the nature or scope of our searches.

Sincerely,

A handwritten signature in black ink, appearing to read "M. Carmen Benavides". The signature is fluid and cursive, with the first letters of the first and last names being capitalized and prominent.

M. Carmen Benavides  
Director, Product Investigations  
and Safety Regulations

Attachments