



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

OCT 18 2012

1200 New Jersey Avenue SE.
Washington, DC 20590

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Ms. Carmen Benavides
Director, Product Investigations
Structure and Safety Integration
General Motors LLC
30001 Van Dyke - Mail Code 480-210-2V1
Warren MI 48090-9055

NVS-212eer
EA12-004

Dear Ms. Benavides:

The Office of Defects Investigation (ODI) of the National Highway Traffic Safety Administration (NHTSA) has upgraded its Preliminary Evaluation (PE12-003) to an Engineering Analysis (EA12-004) to investigate allegations of failure of the driver door module, and to request certain information.

ODI has received a total of 149 complaints regarding the driver door module (DDM) in model year 2006-2007 Chevrolet Trailblazer vehicles, the majority of which involve allegations of fire and/or thermal events. The DDM is an electrical device located on the driver's door panel that controls window and door lock operation, amongst other functions. Additionally ODI has received 26 complaints in model year 2006-2007 GMC Envoy, Buick Rainier, Isuzu Ascender, and Saab 9-7X vehicles, most of which also allege fires and/or thermal events; ODI understands these vehicles were manufactured with a DDM similar to that used in the Trailblazer. Copies of the 175 Vehicle Owner Questionnaire (VOQ) reports have been provided to GM and the VOQ numbers for the reports are listed at the end of this letter.

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

- **Subject component:** The driver door module used in the GMT360/370 vehicles.
- **Subject vehicles:** all vehicles manufactured for sale or lease in the United States that contain the subject component, including, but not limited to the model year 2006-2007 Chevrolet Trailblazer, GMC Envoy, Buick Rainer, SAAB 9-7x, and Isuzu Ascender.
- **GM:** General Motors Company, its predecessor General Motors Corporation, all of their 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, in or after 2000, 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), 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.
- **Alleged defect:** Any fire in the driver's side door, as defined in 49 CFR 579.4.
 - **Recall 12V-406:** The recall described in the Part 573 Defect and Information Report submitted to NHTSA on or about August 15, 2012, whereby GM stated that certain model year 2006 Chevrolet Trailblazer EXT and GMC Envoy XL, and certain model year 2006-2007 Chevrolet Trailblazer, GMC Envoy, Buick Rainier, SAAB 9-7x, and Isuzu Ascender vehicles contained a defect related to motor vehicle safety. Specifically, GM stated that if fluid entered the driver's door module, it could cause corrosion that could result in a short circuit in the circuit board. GM stated that a short could cause the power door lock and power window switches to function intermittently or become inoperative, and in some cases, cause overheating, which could melt components of the door module, and produce odor, smoke, or a fire. GM decided to conduct a regional recall of certain model year 2006 Chevrolet Trailblazer EXT and GMC Envoy XL, and certain model year 2006-2007 Chevrolet Trailblazer, GMC Envoy, Buick Rainier, SAAB 9-7x, and Isuzu Ascender vehicles in Connecticut, Delaware, the District of Columbia, Illinois, Indiana, Iowa, Maine, Maryland, Massachusetts, Michigan, Minnesota, Missouri, New Hampshire, New Jersey, New York, Ohio, Pennsylvania, Rhode Island, Vermont, West Virginia, and Wisconsin.
 - **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 note that **fire** is defined as "combustion or burning of material in or from a vehicle as evidenced by flame. The term also includes, but is not limited to, thermal events and fire-related phenomena such as smoke and melt, but does not include events and phenomena associated with a normally functioning vehicle such as combustion of fuel within an engine or exhaust from an engine." 49 CFR § 579.4

In order for my staff to evaluate the alleged defect, certain information is required. Pursuant to 49 U.S.C. § 30166, please provide numbered responses to the following information requests. Insofar as GM has previously provided a document to ODI, GM may produce it again or identify the document, the document submission to ODI in which it was included and the precise location in that submission where the document is located. When documents are produced, the documents shall be produced in an identified, organized manner that corresponds with the organization of this information request letter (including all individual requests and subparts). When documents are produced and the documents would not, standing alone, be self-explanatory, the production of documents shall be supplemented and accompanied by explanation.

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. 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 2010, or a compatible format, entitled "PRODUCTION DATA."

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 vehicles:
 - a. Consumer complaints;
 - b. Field reports, including dealer field reports;
 - c. Reports involving an 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 component, 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.

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 a fire and/or thermal event is alleged;
- j. Whether a crash is alleged;
- k. Whether property damage is alleged;
- l. Number of alleged injuries, if any;
- m. Number of alleged fatalities, if any;
- n. Whether GM, or a GM dealer, assessed whether a fire and/or thermal event either occurred, or did not occur in the subject component; and,
- o. If GM, or a GM dealer, assessed whether a fire occurred or did not occur, state GM's assessment and GM's reason for the assessment.

Provide this information in Microsoft Access 2010, or a compatible format, entitled "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.), describe the method GM used for organizing the documents, and the criteria GM used to determine whether a fire and/or thermal event occurred, which includes the definition(s) used to describe these events.
5. State, by model and model year, a total count for all of the following categories of claims, collectively, that have been paid by GM to date, which included the replacement of the subject component in the subject vehicles, regardless of the reason for the replacement: warranty claims; extended warranty claims; claims for good will services that were provided; field, zone, or similar adjustments and reimbursements; and warranty claims or repairs made in accordance with a procedure specified in a technical service bulletin, recall, or customer satisfaction campaign.

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 or replacement 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. Labor operation number;
- h. Problem code;

- i. Replacement part number(s) and description(s);
- j. Whether the claim occurred subsequent to a recall repair;
- k. Concern stated by customer;
- l. Comment, if any, by dealer/technician relating to claim and/or repair or replacement
- m. Whether GM, or a GM dealer, assessed whether a fire and/or thermal event either occurred, or did not occur in the subject component; and
- n. If GM, or a GM dealer, assessed whether a fire occurred or did not occur, state GM's assessment and GM's reason for the assessment.

Provide this information in Microsoft Access 2010, or a compatible format, entitled "WARRANTY DATA."

6. Describe in detail the search criteria used by GM to identify the claims identified in response to Request No. 5, including the labor operations, problem codes, part numbers and any other pertinent parameters used. Provide a list of all labor operations, labor operation descriptions, problem codes, and problem code descriptions applicable to the claims provided in this response, and or to the alleged defect in the subject vehicles. Describe the process and or criteria GM used to determine whether or not a fire and/or thermal event occurred in connection with the claim, and the definition(s) GM used to distinguish a fire from a thermal event. State, by make and model year, the terms of the new vehicle warranty coverage offered by GM on the subject vehicles (i.e., the number of months and mileage for which coverage is provided and the vehicle systems that are covered). Describe any extended warranty coverage option(s) that GM offered for the subject vehicles and state by option, model, and model year, the number of vehicles that are covered under each such extended warranty.
7. Produce copies of all service, warranty, and other documents that relate to, or may relate to, the alleged defect in the subject vehicles, that GM has issued to any dealers, regional or zone offices, field offices, fleet purchasers, or other entities. This includes, but is not limited to, bulletins, advisories, informational documents, training documents, recall related documents (and specifically 12V-406 related documents), or other documents or communications, with the exception of standard shop manuals. Also include the latest draft copy of any communication that GM is planning to issue within the next 120 days.
8. Describe in detail, and provide all available information, either in draft or final form, regarding the remedy repair procedure for recall 12V-406, and discuss in detail any alternate plans or procedures GM has considered or may be considering or evaluating as a potential remedy. For any remedy, either actual or under consideration, that involves a repair, rework, or other rectification (as opposed to a replacement) of the existing or original equipment DDM (such as reworking the printed circuit board to protect sensitive, exposed, or vulnerable areas), provide the testing and evaluation GM relied upon to conclude the repair could be adequately performed by a repair technician.
9. Describe all assessments, analyses, tests, test results, studies, surveys, simulations, investigations, inquiries and/or evaluations (collectively, "actions") that relate to, or may

relate to the alleged defect in the subject vehicles, and/or GM's decision to conduct recall 12V-406, including any tests which relate to the subject component's susceptibility to salt/foreign substance contamination and the short versus long term exposure effects of such contamination. For each such action, provide the following information:

- a. Action title or identifier;
- b. The actual or planned start date;
- c. The actual or expected end date;
- d. Brief summary of the subject and objective of the action;
- e. The specific portion(s) of the action that involved or discussed exposure to salt and/or other foreign substances;
- f. Engineering group(s)/supplier(s) responsible for designing and for conducting the action;
- g. A brief summary of the assessments, findings and/or conclusions resulting from the action, including those specific to the exposure to salt and/or other foreign substances; and
- h. Whether GM considered or relied upon the assessments, findings and/or conclusions of the actions in deciding to recall some of the subject vehicles (i.e., to conduct a regional recall action) and not others pursuant to recall 12V-406.

For each action identified, provide copies of all documents related to the action, regardless of whether the documents are in interim, draft, or final form. Organize the documents chronologically by action.

10. Describe in detail all sources of electrical power that are available to the DDM both while the subject vehicle's ignition is powered on, and while it is powered off (i.e., the ignition switch is in either the on or the off position or state). For each power source, describe the entire circuit (from the battery to point of ground) and any circuit protection (current or power limiting device) that is in place for the DDM both when the ignition is powered on or off. For each protective device, describe the type (one-time fusible or self-resetting circuit breaker), provide the current and or power rating, provide its location on the vehicle, and state whether or not the device could be replaced by the consumer or service personnel with a device of a higher current or power rating, either intentionally or inadvertently.
11. State whether or not a fire or thermal event, as defined in 49 CFR 579.4, can occur in the DDM while the subject vehicle's ignition is powered off (i.e., the ignition switch is in the off position or state). If a fire or thermal event can occur while the ignition is powered off, describe in detail how the fire or thermal event occurs (i.e., the expected cause and origin), including which circuits provide the electrical power, and where specifically the condition leading to the event (electrical short, or component overheating) occurs in the DDM and or it's printed circuit board. And similarly, if a fire or thermal event cannot occur, describe in detail why.
12. State whether the presence of, or any precursor to, the alleged defect in the DDM can cause the electrically operated windows in the subject vehicle to operate (i.e. to move up or down) by themselves and without any operator or occupant input, and describe in detail the failure mechanism and circumstances that would cause the windows to operate in this

uncommanded manner. State whether this can occur when the vehicle's ignition is powered on, when it is powered off, or both. Identify the power source that allows the windows to operate without input when the ignition is powered on, and/or powered off. For each window that could potentially move without operator input, state what would happen if an occupant or person outside the vehicle were to get a body part or appendage trapped between an ascending window and the body of the vehicle. State whether or not the window system can detect such a condition, and if so, if it can take an action (such as reverse the window direction, or interrupt power to the window motor) to prevent or mitigate harm to the entrapped person. For each window that can move unexpectedly as a result of the alleged defect, provide information regarding the force and time duration the force could be exerted on an entrapped person. State whether it would be possible for the electric windows to lower themselves and remain in the lowered state when the vehicle is unoccupied and the ignition switch is in the off position (e.g., in the course of a fire incident, during a rain storm, or when valuables may be present in the vehicle).

13. State whether the presence of, or any precursor to, the alleged defect in the DDM can cause the electric or central door locking functionality to become disabled, and describe in detail the failure mechanism that causes it to become disabled. State whether or not the subject vehicle door locks automatically lock (intentionally, as a customer convenience/safety feature) during normal vehicle operation (e.g., when the vehicle exceeds 5 MPH, etc.) and describe the specific conditions that cause the doors to auto-lock. State whether or not the auto-locking functionality, if it exists, can be overridden or disabled by the driver or other occupants, describe the steps that would be required to do so, and state the default configuration of the feature as manufactured (is it enabled or disabled). If the central door locking fails or becomes disabled due to the alleged defect, describe in detail the actions an occupant would need to take to unlock the driver's side specifically, and any other locked door. If these actions were ineffective, or if they were unknown to the occupants, or if the driver was unable to perform the actions due to the presence of fire at the door (i.e., the normal egress path), describe what other actions the driver or other occupants would need to take to exit the vehicle. State whether the interior door release lever (the handle the occupant mechanically actuates to open the door when it is unlocked) can override the door lock mechanism through multiple handle operations, either under normal conditions, or in the presence of a DDM failure, or in the presence of a door fire, and if so, state which door(s) this applies to and the number of handle operations needed to unlock the door. State whether the (mechanical) interior door lock release button can unlock the door lock when the DDM has failed, or when the driver's door is on fire, and explain how this is ensured (e.g., due to a mechanical linkage between the door latch and the lock button that cannot be affected by fire). State whether the presence or precursor to the alleged defect in the DDM can cause the doors to lock and or unlock without occupant intent (i.e., uncommanded), and whether this can occur with the ignition on, the ignition off, or both.
14. Produce or provide one of each of the following:
 - a. Engineering drawings, including material specifications and circuit diagrams, of all subject component used on the subject vehicles, including the original design, and the

revised design released into production on or about May 14, 2007, after corrective actions were implemented.

- b. The printed circuit board layout/diagram used in the subject components, including the original design, and the revised design released into production on or about May 14, 2007, after corrective actions were implemented.
 - c. A thorough description of the changes made to the PCB layout as a result of a production changes implemented by the supplier, Solectron Invotronics, which were implemented into production on or about May 14, 2007.
 - d. An example of the DDM printed circuit board as produced both prior to, and after the modifications implemented by the supplier, Solectron Invotronics, which were implemented into production on or about May 14, 2007.
15. State the number of each of the following that GM has sold that may be used in the subject vehicles by component name, part number (both service and engineering/production), model and model year of the vehicle in which it is used, and month/year of sale (including the cut-off date for sales, if applicable):
- a. Subject component; and
 - b. Any kits that have been released, or developed, by GM for use in service repairs, recall remedies, or replacements to the subject components.

For each subject component design, provide the supplier's name, address, and appropriate point of contact (name, title, and telephone number). Also identify by make, model and model year, any other vehicles of which GM is aware that contain the identical driver door module, whether installed in production or in service, and state the applicable dates of production or service usage.

16. Describe in detail the subject component's susceptibility to contamination by salt and/or other foreign substances, and describe in detail the short and long term exposure effects of contamination of the subject component by salt and foreign substances, including GM's assessment of the minimal exposure conditions that can result in the occurrence of a fire or thermal event, as defined in 49 CFR 579.4. Identify, by production number the location in GM's production of each test performed which relates to the subject component's susceptibility to contamination by salt and foreign substances. Explain whether and in what manner the subject component is more susceptible to contamination by salt and foreign substances in the regions where recall 12V-406 was conducted, as opposed to the regions where recall 12V-406 was not conducted. Identify all tests, studies, and analyses which demonstrate that the subject component is more susceptible to contamination in the regions where recall 12V-406 was conducted when compared to the regions where recall 12V-406 was not conducted, and explain how each test, study, or analysis was factored into GM's decision to conduct recall 12V-406.
17. For each subject vehicle manufactured to date by GM provide the following information:
- a. VIN;
 - b. Each state in the U.S. where the vehicle was registered; and,

- c. For each state in which the vehicle was registered, the latest date of registration in the U.S. state.

Provide this information in Microsoft Access 2010, or a compatible format, entitled "REGISTRATION DATA."

18. Furnish GM's assessment of the defect in the subject vehicles which were recalled pursuant to recall 12V-406, including:
 - a. The causal or contributory factor(s);
 - b. The failure mechanism(s);
 - c. The failure mode(s);
 - d. The risk to motor vehicle safety that it poses;
 - e. What warnings, if any, the operator and other persons both inside and outside the vehicle would have that the alleged defect was occurring or subject component was malfunctioning; and
 - f. The reports included with this inquiry.

19. Furnish GM's assessment of the alleged defect in the subject vehicles which were not recalled pursuant to recall 12V-406, including:
 - a. The causal or contributory factor(s);
 - b. The failure mechanism(s);
 - c. The failure mode(s);
 - d. The risk to motor vehicle safety that it poses;
 - e. What warnings, if any, the operator and other persons both inside and outside the vehicle would have that the alleged defect was occurring or subject component was malfunctioning;
 - f. The reports included with this inquiry;
 - g. Whether it is possible for fluid to enter the driver's door module of the subject vehicles that were not recalled pursuant to recall 12V-406, and if so:
 - i) Whether such fluid entry could cause corrosion that could result in a short circuit in the circuit board of the subject component;
 - ii) Whether a short circuit in the circuit board of the subject component could cause the power door lock and power window switches to function intermittently, function unintentionally, or become inoperative; and
 - iii) Whether a short circuit in the circuit board of the subject component could cause overheating, which could melt components of the door module, producing odor, smoke, or a fire;
 - h. A description of how the subject component in the subject vehicles which were not recalled pursuant to recall 12V-406 differs from the subject component in the subject vehicles that were recalled;
 - i. The technical or engineering basis for GM's decision not to recall all of the subject vehicles pursuant to recall 12V-406, including a list of any tests or analyses that were conducted and relied upon by GM in making a decision not to recall all of the subject vehicles pursuant to recall 12V-406, and identification, by production number of the location in GM's production of each test identified in this subpart;

- j. Any non-technical or non-engineering basis for GM's decision not to recall all of the subject vehicles pursuant to recall 12V-406; and
- k. All information on how road salt caused the failures in the subject vehicles recalled pursuant to recall 12V-406.

This letter is being sent to GM 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 and to request reports and the production of things. It constitutes a new request for information. GM's failure to respond promptly and fully to this letter could subject GM 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. (Other remedies and sanctions are available as well.) Section 5(a) of the TREAD Act, codified at 49 U.S.C. § 30165(a), provides for civil penalties of up to \$6,000 per day, with a maximum of \$17,350,000 for a related series of violations, for failing or refusing to perform an act required under 49 U.S.C. § 30166. See 49 CFR 578.6 (as amended by 71 Fed. Reg. 28279 (May 16, 2006)). This includes failing to respond to ODI information requests.

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 November 26, 2012. **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 EA12-004 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) 366-8089 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.

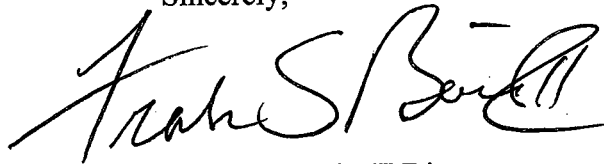
If GM claims that any of the information or documents provided in response to this information request constitute confidential commercial material within the meaning of 5 U.S.C. § 552(b)(4), or are protected from disclosure pursuant to 18 U.S.C. § 1905, GM must submit supporting information together with the materials that are the subject of the confidentiality request, in accordance with 49 CFR Part 512, as amended, 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. 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. If you submit a request for confidentiality for all or part of your response to this IR, that is in an electronic formation (e.g., CD-ROM), your request and associated submission must conform to the new requirements in NHTSA's Confidential Business Information Rule regarding submissions in electronic formats (49 CFR 512.6(c)). See Federal Register, volume 72, page 59434 (October 19, 2007).

Please send email notification to Scott Yon (scott.yon@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. Also provide tracking numbers for the submissions.

If you have any technical questions concerning this matter, please call Scott Yon of my staff, at (202) 366-0139.

Sincerely,



Frank S. Borris, II Director
Office of Defects Investigation
Enforcement

VOQ Nos: 10247838, 10260600, 10274337, 10275626, 10284010, 10396958, 10406203, 10409023, 10414691, 10417938, 10423865, 10426281, 10434446, 10445657, 10447754, 10447757, 10447770, 10447788, 10447813, 10447831, 10447865, 10447880, 10447892, 10447938, 10447994, 10447996, 10447997, 10448028, 10448086, 10448138, 10448176, 10448201, 10448337, 10448455, 10448464, 10448478, 10448540, 10448900, 10448941, 10449150, 10449166, 10449169, 10449236, 10449722, 10450055, 10450202, 10450284, 10451584, 10451878, 10451918, 10452197, 10452301, 10452586, 10452743, 10452895, 10453161, 10453227, 10453261, 10453578, 10453746, 10453951, 10454196, 10454211, 10454539, 10455122, 10455150, 10455279, 10455469, 10456285, 10456529, 10457116, 10457644, 10457811, 10458224, 10458485, 10458599, 10458743, 10458846, 10460062, 10460141, 10460732, 10460843, 10461101, 10461126, 10463304, 10464303, 10464791, 10465337, 10466270, 10466516, 10466727, 10466801, 10468349, 10468899, 10468913, 10469029, 10469098, 10469208, 10469239, 10469275, 10469317, 10469413, 10469602, 10469659, 10469692, 10470299, 10470354, 10471251, 10471373, 10471462, 10471489, 10471498, 10471499, 10471509, 10471512, 10471530, 10471712, 10471740, 10471777, 10471858, 10471871, 10471932, 10471933, 10472050, 10472373, 10472377, 10472583, 10472665, 10473109, 10473741, 10473890, 10474098, 10474722, 10475611, 10475616, 10475886, 10475893, 10476489, 10252743, 10294713, 10326179, 10330175, 10447750, 10449135, 10450511, 10453101, 10455301, 10471417, 10471449, 10471585, 10471727,

10472586, 10473138, 10474468, 10475276, 10217640, 10228514, 10458243, 10471822,
10475284, 10476654, 10477280, 10477144, 10479523, 10477142, 10477169, 10477201,
10477247, 10478295, 10478645, 10479275, 10479337, 10479592, 10479786, 10479852