



April 1, 2013

Jennifer Timian, Chief
Recall Management Division
Office of Defects Investigation
National Highway Traffic Safety Administration
1200 New Jersey Ave, SE, Room W48-302
Washington, DC 20590

N130070
NVS-215/aa
AQ12-002
12V-288

Dear Ms. Timian:

This letter is General Motors' (GM) response to your Audit Query (AQ) investigation, AQ12-002, dated February 25, 2013.

Your requests and our corresponding replies are as follows:

- 1. Identify any and all notices or communications GM transmitted or otherwise made available to Chapman Chevrolet (including, but not limited to, notifications, service bulletins, recall notices, reports, and letters, whether paper or electronic (such as through any GM interactive network)) concerning safety recall 12V-288. For each notice or communication you identify, state: (a) the date GM transmitted it or otherwise made it available to Chapman Chevrolet; (b) the type of the notice or communication (e.g., recall notice, dealer bulletin, etc.); (c) the means of transmission (e.g., email, GM interactive network, fax etc.); and (d) the number of affected units GM identified as within Chapman Chevrolet's possession, if any.**

Produce a copy of each notice or communication you identify in response to this question, including copies of any accompanying attachments.

Responsive information, to the extent it is available in GM records, is identified in Table 1-1 below. A copy of each notice or communication identified in Table 1-1, with the exception of the Campaign Initiation Detail Report (CIDR), which is no longer available, is provided on the ATT_1_GM disk; folder labeled "Q_01". The Investigate Vehicle History (IVH) record included in Table 1-1 is an example of one involved VIN only, and is provided on the ATT_2_GM_CONF disk; folder labeled "Q_01". At the time Recall 12V-288 was issued, GM records indicated that there were 29 affected units assigned to Chapman Chevrolet without an owner name or address. The actual number of involved vehicles in Chapman Chevrolet's possession could differ.



All communications to dealers about Recall 12V- 288 summarized in Table 1-1 were communicated through Global Connect, GM's interactive dealer communications network. Additional information about each form of communication is provided below.

The primary mechanism for notifying dealers of an open recall on a vehicle VIN is the IVH within Global Connect. For every recall that is released, each involved VIN is updated in IVH. For each vehicle that is in dealer inventory, the dealer is required to use IVH to verify any recall involvement and make corrections prior to sale.

Additional information made available through Global Connect for communicating safety related recall information to dealers includes the following:

- A dealer notification and dealer bulletin is provided at the time a recall is issued. The Global Connect homepage provides notice that a new bulletin is available at sign in whenever a new recall has been issued. In this case, the dealer notification and bulletin were updated several times. Each time an update was added to Global Connect, the homepage provided notice of a new notification or bulletin at sign in.
- The VIN list of affected vehicles specific to each dealer is contained in the Campaign Initiation Detail Report (CIDR), which is created and released at the time of each recall. The report includes the VINs involved in the specific recall, reason assigned to the dealer, and customer's name, address and telephone number, to facilitate recall follow up by the dealer.
- The Open Vehicles Report (OVR) is updated during the first week of each month to identify those vehicles assigned to the dealer that have an open recall (i.e., not yet completed). OVRs remain in Global Connect for two months. The OVR is dealer specific and includes recalls released for a minimum of the previous 24 months for which an assigned vehicle remains unrepaired. This report lists the open VINs assigned to the dealer, along with owner name, address and telephone information to facilitate recall follow up by the dealer. A vehicle on this list may be assigned to a dealer if it is in the dealer's stock, was sold by the dealer, the dealer is the preferred dealer, or the dealer is the closest dealer to the owner's location, etc. OVRs with information about Recall 12V-288 have been made available monthly since July 2012. Two OVRs presently available within Global Connect are the February 2013 and March 2013 reports. Pages from those two reports for Chapman Chevrolet that show open VINs applicable to 12V-288 are provided on the ATT_2_GM_CONF disk; folder labeled "Q_01".

Document	Date Transmitted	Type of Document	Means of Transmission
12081 (NHTSA 12V-288) and 12133 (NHTSA 12V-289) Dealer Notification.pdf	June 22, 2012	PDF	Global Connect (GM Interactive Network)
12081 Safety Bulletin.pdf Oil Spills or Leaks onto Hot Surfaces – Modify Engine Shield	June 22, 2012	PDF	Global Connect (GM Interactive Network)
12081 Electronic VIN List (CIDR) (No longer available)	June 22, 2012	PDF	Global Connect (GM Interactive Network)
12081 Electronic VIN Available.pdf (IVH)	June 22, 2012	See response to Request No. 1.	Global Connect (GM Interactive Network)
12081A Dealer Notification.pdf	June 27, 2012	PDF	Global Connect (GM Interactive Network)
12081A Safety Bulletin and Owner Letter.pdf	June 27, 2012	PDF	Global Connect (GM Interactive Network)
12081B Dealer Notification.pdf	July 18, 2012	PDF	Global Connect (GM Interactive Network)
12081B Safety Bulletin and Owner Letter.pdf	July 18, 2012	PDF	Global Connect (GM Interactive Network)
OVR	February 3, 2013	See response to Request No. 1.	Global Connect (GM Interactive Network)
OVR	March 3, 2013	See response to Request No. 1.	Global Connect (GM Interactive Network)

TABLE 1-1 NOTICES/COMMUNICATIONS RELATED TO SAFETY RECALL 12V-288 (12081)

2. Identify any other communications, other than those already identified and produced in your response to Information Request No. 1, between GM and Chapman Chevrolet concerning safety recall 12V-288. For each such communication, state: (a) the date GM transmitted it or otherwise made it available to Chapman Chevrolet; (b) the purpose of the communication; and (c) and the means of transmission.

Produce a copy of each communication you identify in response to this question, including copies of any accompanying attachments.

In addition to the communications identified in response to Q1, a phone conversation took place between a Chevrolet Zone Manager and the Executive Manager of Chapman Chevrolet in August 2012, to inform Chapman that NHTSA had asked GM for information regarding a vehicle sale and recall repair at issue in a Vehicle Owner Questionnaire concerning Recall 12V-288.

- 3. Chapman Chevrolet's Information Request (IR) response and the attachments included indicate that GM supplied it a combined notification for recall 12V-288 and another recall, 12V-289 (also referenced as GM campaign 12133, fuel tank weld spots/fuel leak/possible fire). Please verify all aspects of this information and, if true, provide GM's reasoning for combining safety recall notifications to its dealers. Also, please explain if this method, of combining safety recall notifications, is a common practice.**

Produce a copy of this communication as transmitted or made available to Chapman Chevrolet and other GM dealers.

General Motors provided all dealers with a combined safety recall dealer notification for recalls 12V-288 and 12V-289 in this case because both were announced on June 22, 2012, and the 52,239 subject vehicle population of 12V-289 is a subset of the 413,233 subject vehicle population for 12V-288. The safety recall notifications were combined to help facilitate the performance of both recalls while the vehicles were at the dealership.

The CIDR listing of the subject vehicle populations for recall 12V-288 was made available electronically in Global Connect on June 22, 2012. In addition, the Recall 12V-289 notification contained an attached (pdf) VIN listing on June 22, 2012, which is provided on the ATT_2_GM_CONF disk; folder labeled "Q_03". The Recall 12V-288 did not contain an attached (pdf) VIN listing due to the large size of the file.

It is not a common occurrence that two recalls are issued at the same time for the same model and model year vehicles, and therefore combining safety recall notifications is not a common practice.

- 4. Chapman Chevrolet's IR response included a GM dealer notice dated June 22, 2012, stating, "The attached list provides the Vehicle Identification Number of each vehicle involved in recall 12133. It is sorted by dealer Business Associate Code for immediate reference." Please state if GM included in the list to Chapman only a list of VINs applicable to recall 12V - 289 or if GM included VIN lists for both recalls 12V-288 and 12V-289.**

The requested information is provided in response to Request No. 3.

- 5. Produce a copy of all VIN lists that GM transmitted or otherwise made available to Chapman Chevrolet for recall 12V-288. State the date GM transmitted or made available each list to the dealership, and identify the means by which each list was transmitted or made available. If GM did not provide such a list for recall 12V-288, please explain GM's reasons for not**

doing so. If no such VIN list was provided to Chapman Chevrolet (for recall 12V-288), but a VIN list for recall 12V-289 (GM campaign 12133) was provided, please explain the reasoning for this decision.

The requested information is provided in response to Request Nos. 1 and 3.

- 6. For each and every safety recall of which GM notified NHTSA during calendar years 2010 through 2012, and for which GM notified Chapman Chevrolet (including but not limited to a specific recall notice), produce a spreadsheet table detailing the following about each new vehicle that was in Chapman Chevrolet's possession, subject to that recall, and had not yet been sold and delivered to the first purchaser other than for resale at the time GM first notified Chapman Chevrolet of the recall:**
- a. The VIN;**
 - b. The GM recall number;**
 - c. The NHTSA recall number;**
 - d. The date GM issued a recall notice to Chapman Chevrolet;**
 - e. The means of transmission of the notification referred to in subpart (d) above (email, GM interactive network, fax, etc.);**
 - f. The date GM transmitted or otherwise made available to Chapman Chevrolet a VIN list or other information from which to ascertain the vehicle's inclusion in the safety recall;**
 - g. The means of transmission for the VIN list or other information from which to ascertain the vehicle's inclusion in the safety recall and recall notice, (e.g., email, GM interactive network, fax etc.);**
 - h. The date on which Chapman Chevrolet took possession of the vehicle;**
 - i. What Chapman Chevrolet ultimately did with the vehicle (e.g., sold to a retail customer; leased to a retail customer);**
 - j. The date on which the vehicle was leased or sold to the first purchaser other than for resale (e.g., sold to a retail customer) (if applicable);**
 - k. The date on which the vehicle was delivered by Chapman Chevrolet to the first purchaser;**
 - l. Whether the recall remedy was performed on the vehicle. "Recall remedy" refers to the inspection and repair procedures GM instructed Chapman Chevrolet to perform under the recall;**
 - m. The date on which the recall remedy was performed on the vehicle;**
 - n. The name and address of the entity that performed the recall remedy on the vehicle (e.g., Chapman Chevrolet).**

Provide your responses in a table in Microsoft Access or Excel entitled "Vehicles Requiring Recall Notice."

The dealer maintains the records necessary to identify the timing of recall repairs vis-à-vis vehicle sale and delivery. GM's records include only (a) the original owner sales date as reported by the dealer, (b) the warranty start date as reported by the dealer, and (c) the repair order date provided by the dealer. GM records do not include the actual date on which the vehicle was delivered to the first purchaser. GM cannot attest to the accuracy or validity of the information reported by the dealer to GM. In some cases the vehicle may have been repaired prior to the actual delivery of the vehicle even though the reported sales date may be prior to the reported repair date.

To the extent the requested information is contained in GM's records, it is provided on the ATT_2_GM_CONF disk; folder labeled "Q_06". Delivery date information is not available and is not provided on the attached disk.

- 7. As to any GM dealership, excluding Chapman Chevrolet, identify by VIN, retailing dealership name and dealership mailing address any new Chevrolet Cruze vehicles subject to recall 12V-288 that were sold and delivered to the first purchaser before the recall remedy was performed on the vehicle.**

As stated in response to Request No. 6, GM records do not include delivery date information, and GM cannot attest to the accuracy or validity of other information reported by dealers.

- 8. Provide any additional information, including supporting documentation, GM considers important for the agency to consider in reviewing and evaluating GM's responses to any of the requests above. As one example, identify any anomalies in the data or documents and explain the reason(s) for those anomalies.**

The completion rate for recall 12V-288 as of April 1, 2013, is 89.54%.

Also, in addition to the means listed in response to Request No. 1 to notify dealers about open recalls, a dealer can query Global Connect for "Service Update and Field Action Bulletin Information" to generate a report that shows all vehicles in dealer inventory with an open Service Update or Field Action.

* * *

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,

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

M. Carmen Benavides, Director
Product Investigations and Safety Regulations

Attachments