



GENERAL MOTORS LLC
Vehicle Safety and Crashworthiness

January 29, 2014

O. Kevin Vincent, Esq, Chief Counsel
Office of Chief Counsel (NCC-111)
NHTSA, West Building W41-227
1200 New Jersey Avenue, SE
Washington, DC 20590

N130146
NHTSA Discussion
EA13007

Dear Mr. Vincent:

Enclosed with this letter are materials prepared by General Motors (GM) following its January 23, 2014, phone conference with Scott Yon, Chief, Office of Defect Investigations. GM is submitting this information voluntarily to Mr. Yon as a follow up to that discussion.

Submitted with this letter are three copies of GM's January 23, 2014, presentation to the NHTSA regarding allegations of simultaneous loss of both low beam headlights without warning while operating model year (MY) 2005-2013 Chevrolet Corvette vehicles manufactured by General Motors LLC (GM). Two copies include the confidential documents and the third does not.

GM requests that the documents stamped "GM Confidential Business Information" included in ATT_2_GM_CONF disk be afforded confidential treatment without a time limitation by the NHTSA. This information is a voluntary submission to the agency and is the kind of information that is customarily not released to the public by GM, and contains trade secrets and confidential commercial information which is privileged or confidential under 5 U.S.C. Section 552(b)(4), 49 CFR Part 512 and 49 U.S.C. Section 30167(a). GM submits that the competitive harm would be substantial because the design and manufacture of vehicles and vehicle components are the core of its business, and because global competition in that business is intense.

The document discloses information about GM's application of engineering business process for engineering judgment, analysis methodologies and action. This information would give competitors insight into GM's methodologies and disclose confidential information about the design and performance of its products, without spending their own resources or compensating GM for the knowledge they would gain. This confidential information is proprietary to GM and is maintained by GM.



GM treats the above material as confidential information available only to authorized GM and supplier personnel who have a business need for it, and is not otherwise available to the public. These documents are maintained under a record-keeping system that is intended to control dissemination of this material within GM, and to assure that it is not freely disseminated outside the Corporation. Multiple security systems are used to limit access to facilities and record storage systems where confidential information is stored, and employees receive training in information security policies and procedures.

To the best of our knowledge, no prior determinations of the confidentiality of the information submitted with this request have been made by the NHTSA, other Federal Agencies or the Federal Courts. Documents such as these containing analysis methodology have normally been granted confidential treatment by the NHTSA in the past.

The document subject to this request for confidentiality is being provided and has been clearly stamped "GM Confidential Business Information" on a disk label. If a request for disclosure of any or all of this information is received by the NHTSA, GM requests notification of receipt of each such request and, if necessary, an opportunity to further explain the reasons why such material is trade secret and commercial information which should not be disclosed under the applicable statutes and regulations.

If you require further information, please do not hesitate to call me.

Sincerely,



M. Carmen Benavides, Director
Product Investigations and Safety Regulations

Attachment

**CERTIFICATE IN SUPPORT OF
REQUEST FOR CONFIDENTIALITY**

I, M. Carmen Benavides, pursuant to the provisions of 49 CFR Part 512, state as follows:

- (1) I am Director of Product Investigations and Safety Regulations of General Motors LLC and am authorized to execute this certificate on its behalf.
- (2) I certify that the information contained in the document identified in the letter dated January 29, 2014, is confidential and is being submitted with the claim that it is entitled to confidential treatment under 5 U.S.C. 552(b)(4) and 49 C.F.R. Part 512.
- (3) I hereby request that the information be protected without a time limitation.
- (4) This certification is based on the information provided by GM personnel who have responsibility for the information being provided to the NHTSA for which a claim of confidentiality has been made.
- (5) Based on that information, to the best of my knowledge, information and belief, the information for which GM has claimed confidential treatment is the kind of information that is customarily not released to the public by GM, except as may be required by law.
- (6) I make no representations beyond those contained in this certificate and, in particular, I make no representations as to whether this information may become available outside GM because of unauthorized or inadvertent disclosure.
- (7) I certify under penalty of perjury that the foregoing is true and correct. Executed on this the 29th day of January 2014.



M. Carmen Benavides, Director
Product Investigations and Safety Regulations

EA13-007

GM

1/29/2014

ATTACHMENT

2005-2013 Corvette UBEC-

NHTSA-23 Jan 14-p

{ * } Indicates GM Confidential Business Information Redacted

Underhood Bussed Electrical Center



Model Year: 2005 - 2013 Corvette
200,114 total vehicles

NHTSA PE 13-013
NHTSA EA 13-007

ETQ N140XXX

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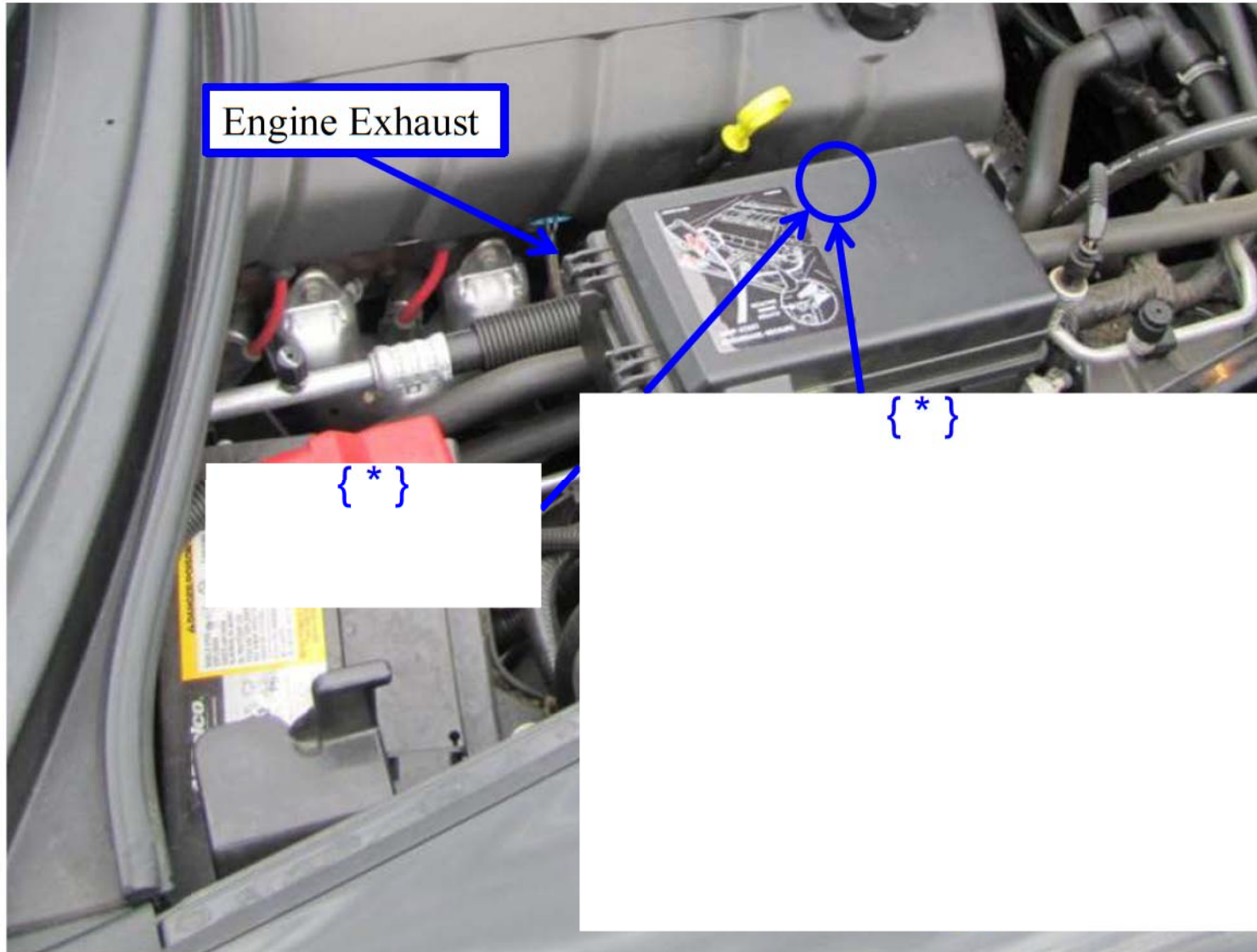
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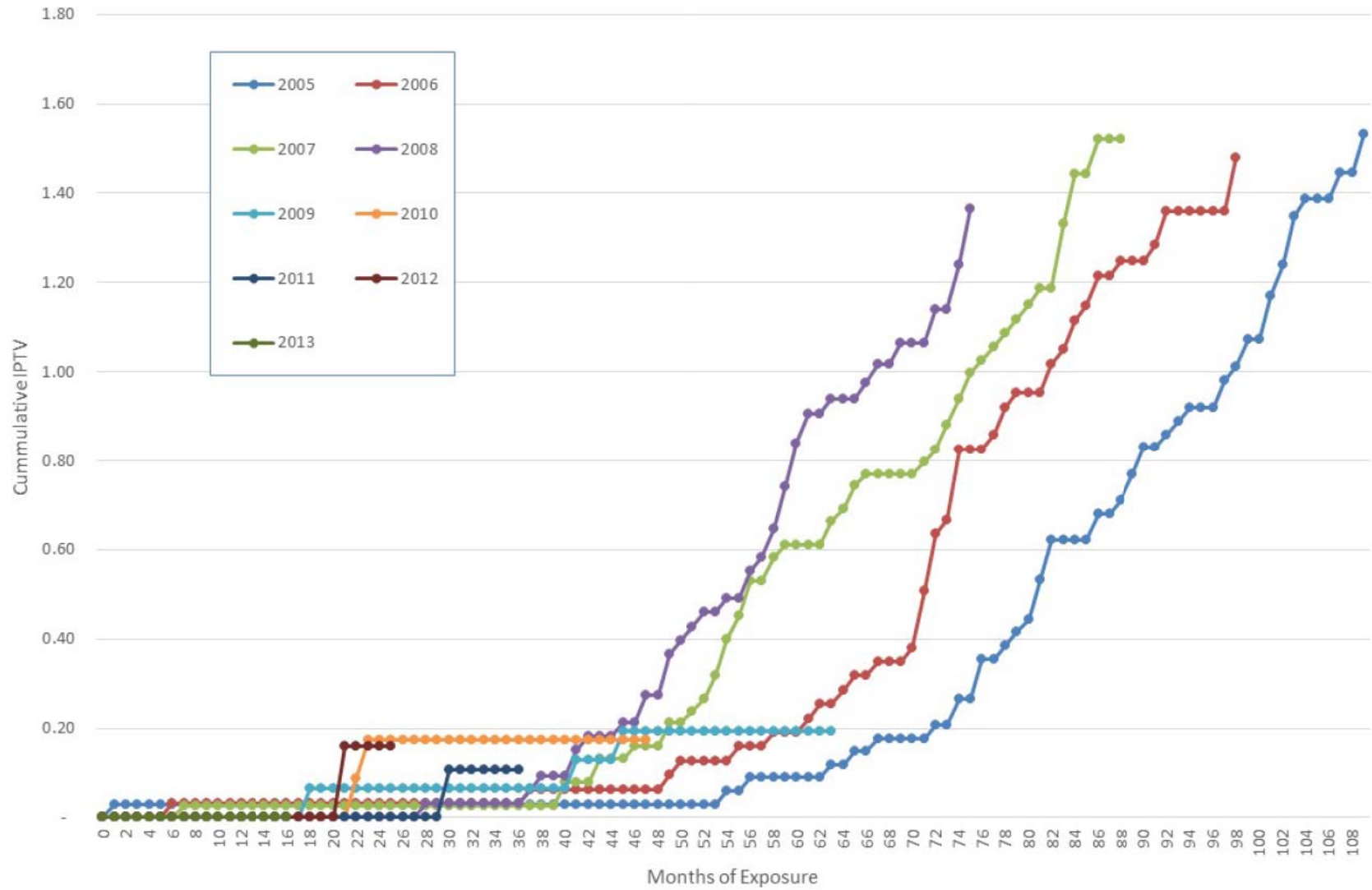
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{ * } Indicates GM Confidential Business Information Redacted



2005 to 2013 Corvette Headlamp Issue

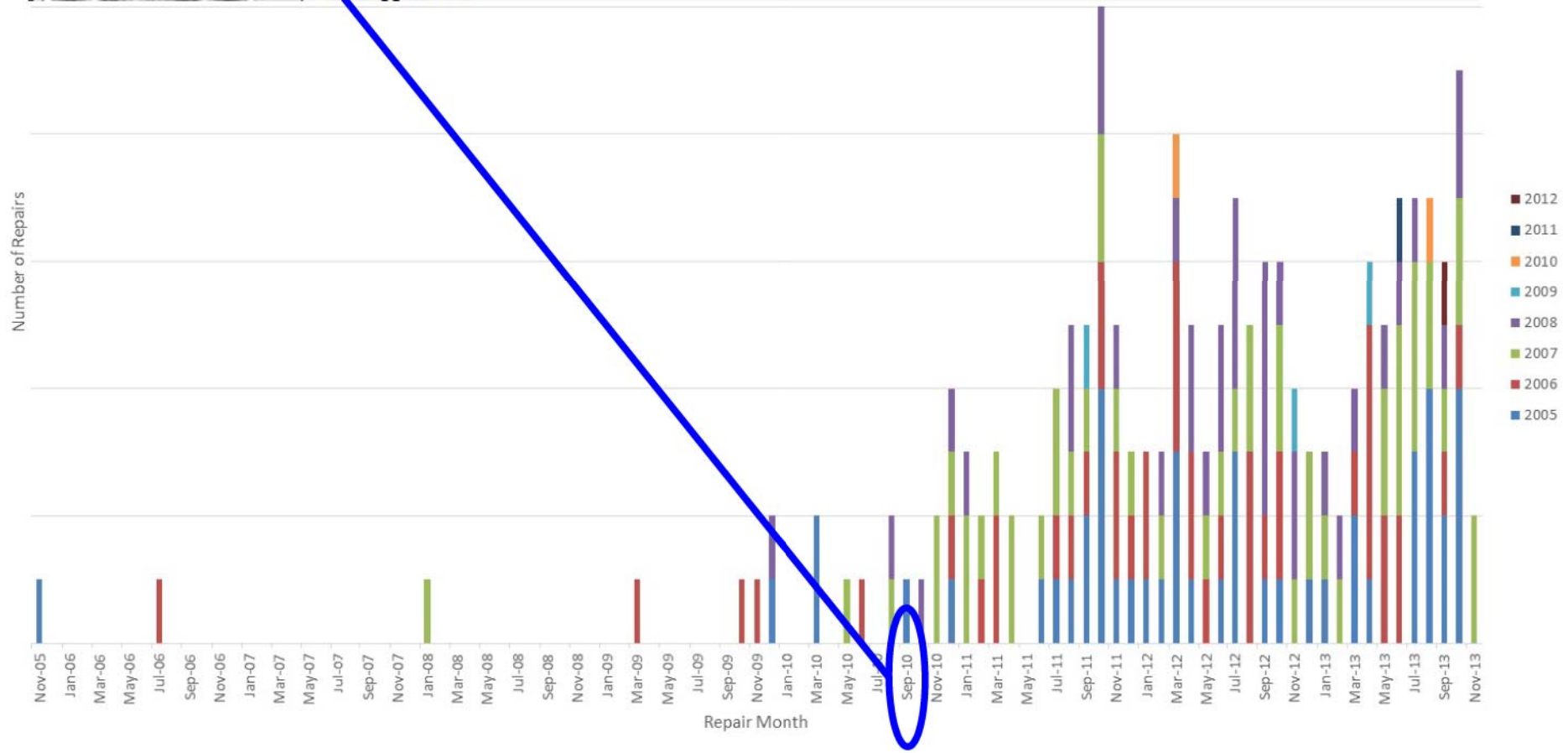


09-26-2010, 01:35 PM

Jimboaux
 CF Senior Member
 ★★★★★
[Garage is empty, add now](#)

No Low Beam Headlights

The low beam headlights on my 05 quit working.
 The fuses for the left and right lamps are good. I replaced the relay this morning and the low beams are still not working.
 Any suggestions?















U.S. Department
of Transportation

**National Highway
Traffic Safety
Administration**

ODI RESUME

OFFICE OF DEFECTS INVESTIGATION



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the content has remained unchanged

Investigation:	PE 10-037	Date Closed:	12/20/2010
Date Opened:	09/16/2010	Reviewer:	Scott Yon
Investigator:	John Abbott		
Approver:	Richard Boyd		
Subject:	Low Beam Headlights		

MANUFACTURER & PRODUCT INFORMATION

Manufacturer:	HONDA (AMERICAN HONDA MOTOR CO.)
Products:	2007 and 2008 Honda Fit
Population:	143,083

Problem Description: Low beam headlights stop working

FAILURE REPORT SUMMARY

	ODI	Manufacturer	Total
Complaints:	29	93	122
Crashes/Fires:	0	0	0
Injury Incidents:	0	0	0
Fatality Incidents:	0	0	0
Other*:	0	35	35

*Description of Other: Warranty



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Investigation: PE 11-017
Date Opened: 04/29/2011
Investigator: John Abbott
Approver: Frank Borris
Subject: Low Beam Headlights Stop Working

Date Closed: 09/23/2011
Reviewer: Scott Yon

MANUFACTURER & PRODUCT INFORMATION

Manufacturer: HONDA (AMERICAN HONDA MOTOR CO.)
Products: Model Year 2002 through 2004 Honda CR-V
Population: 431,000 (Estimated)
Problem Description: Both low beam headlights stop working simultaneously

FAILURE REPORT SUMMARY

	ODI	Manufacturer	Total
Complaints:	34	80	114
Crashes/Fires:	0	0	0
Injury Incidents:	0	0	0
Fatality Incidents:	0	0	0
Other*:	0	0	0

*Description of Other:



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ODI RESUME

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Investigation: EA 11-012
Prompted by: Consumer complaints, PE11-017
Date Opened: 09/12/2011 **Date Closed:** 09/17/2012
Investigator: John Abbott **Reviewer:** Scott Yon
Approver: Frank Borris
Subject: Low Beam Headlights Stop Illuminating

MANUFACTURER & PRODUCT INFORMATION

Manufacturer: Honda (American Honda Motor Co.)
Products: Model Year 2002 through 2004 Honda CR-V
Population: 431,244

Problem Description: Both low beam headlights stop illuminating simultaneously due to an electrical circuit failure.

FAILURE REPORT SUMMARY

	ODI	Manufacturer	Total
Complaints:	74	127	201
Crashes/Fires:	0	0	0
Injury Incidents:	0	0	0
Fatality Incidents:	0	0	0
Other*:	38	373	395**

*Description of Other: MY 2003-2005 Pilot and MY 2002-2003 Civic reports, see below for further detail

** Total eliminates duplicates received by ODI and manufacturer.

Vehicle Build Date (X) v. Mileage(Y) for Warranty Claims

