



May 17, 2013

Scott Yon, Chief
Vehicle Integrity Division
Office of Defects Investigation
National Highway Traffic Safety Administration
1200 New Jersey Ave, SE, Room W48-314
Washington, DC 20590

N130036

RQ13-001

Dear Mr. Yon:

This letter is a supplement to General Motors' (GM) response to your Recall Query (RQ), received February 13, 2013, regarding allegations of brake lamp malfunctions on model year (MY) 2005 through 2010 Pontiac G6, MY 2004 through 2011 Chevrolet Malibu and MY 2007 through 2009 Saturn Aura vehicles manufactured for sale or lease in the United States.

As noted in the April 17, 2013 response, GM continued to search for documents pertaining to question 8 and has completed the review of the additional responsive attachments for question 2. These additional documents are being provided with this response.

- 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.

In response to requests 2c-2f, GM is providing additional attachments associated with the records that were provided in GM's April 17, 2013 response. The counts provided in Table 2-1 of the April 17, 2013 response remain unchanged and these additional attachments are associated with the records already provided in that response. These additional attachments are provided on ATT_1_GM disk; file Q_03.

- 8. 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 that have been conducted, are being conducted, are planned, or are being planned by, or for, GM. 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. Engineering group(s)/supplier(s) responsible for designing and for conducting the action; and**
 - f. A brief summary of the findings and/or conclusions resulting from the action.**

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.

The information listed in Table 8-1 below is a summary of actions that have been conducted, are being conducted, are planned, or are being planned by or for GM regarding the alleged defect in the subject vehicles as of March 8, 2013. Additional documents and supporting information not included in the April 17, 2013 response are being provided in the attachments as noted in the table.

General Motors requested assistance and documents from a supplier in responding to this question and this response included those documents and the information received from this supplier.

Action 8-A: GM Internal Investigation

Start Date: August 1, 2012

End Date: Ongoing

Engineering Group: GM Engineering

Attachments: ATT_1_GM disk; folder labeled "Q_08"
ATT_2_GM_Conf disk; folder labeled "Q_08"

Description: GM's ongoing investigation of the alleged defect in the subject vehicles and related documentation.

Summary of Action: Additional information that may relate to the alleged condition, completed since the November 8, 2008 submission to the NHTSA. Internal presentations and documents related to this subject.

Action 8-B: Delphi Engineering Studies and Prints

Start Date: June 2, 2009

End Date: March 10, 2011

Engineering Group: Delphi Engineering

Attachments: ATT_1_GM disk; folder labeled "Q_08"
ATT_3_Delphi_Conf disk; folder labeled "Q_08"

Description: Delphi documents presented during GM meetings and reviews.

Summary of Action: Engineering study data and specifications related to BCM vibration testing.

TABLE 8-1 SUMMARY OF ACTIONS THAT HAVE BEEN CONDUCTED

* * *

GM claims that certain information, in documents that are part of lawsuit and claims files maintained by the GM Legal Staff, is attorney work product and/or privileged. That information includes notes, memos, reports, photographs, and evaluations by attorneys (and by consultants, claims analysts, investigators, and engineers working at the request of attorneys). GM is producing responsive documents from claims files that are neither attorney work product nor privileged, and withholding those that are attorney work product and/or privileged.

This response is based on searches of 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 predecessor corporations, and all of its past and present officers and employees, whether assigned to principal offices or any field or other location, including 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 2000, were involved in any way with any of the following related to the subject condition in the subject peer vehicles:

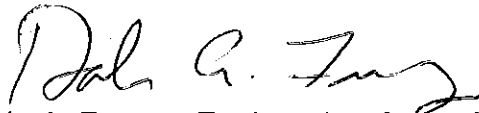
- a. Design, engineering, analysis, modification or production (e.g. quality control);

- 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.”

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,



Dale A. Furney, Engineering Group Manager
Product Investigations

Attachments