

October 7, 2013

Scott Yon, Chief Vehicle Integrity Division Office of Defects Investigation National Highway Traffic Safety Administration 1200 New Jersey Ave, SE, Room W46-409 Washington, DC 20590

N130136 Partial III

NVS-212eer RQ13-003

Dear Mr. Yon:

This letter is General Motors' (GM) partial response to your Recall Query (RQ13-003) to investigate Generator Control Module (GCM) overheating that could lead to smoke and/or fire. The overheating occurs in certain model year (MY) 2012-2013 Buick Regal and LaCrosse, and MY 2013 Chevrolet Malibu Eco vehicles, equipped with eAssist, manufactured by General Motors LLC (GM).

As you agreed previously, this is a partial response containing responsive information to requests 7c and 9. GM is also including additional field reports responsive to requests 2, 3 and 4 that were not included in our September 9, 2013, partial response.

NHTSA Information Requests (IRs) do not typically include RQ13-003 request 7c. GM is continuing to review information that may be responsive to requests 7c and 9. GM will complete the review of approximately 1,900 documents and provide additional responsive information by October 25, 2013.

Your requests and our corresponding replies are as follows:

- 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, including those from fleet operators;
 - b. Field reports, including dealer field reports;
 - c. Reports involving a crash, injury or fatality;
 - d. Reports involving a fire;
 - e. Property damage claims;
 - f. Third-party arbitration proceedings where GM is or was a party to the arbitration; and
 - g. Lawsuits, both pending and closed, in which GM is or was a defendant or codefendant.



For subparts "a" through "g," 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 "g," 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 "f" and "g," 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.

GM is providing reports containing an indication that the GCM or any of its components overheats, which may be manifested by odor, melting, smoke or fire as defined by 49 CFR 579.4(c). The "fire" column in table 2-1 indicates reports where there was an allegation of fire and/or flames.

Table 2-1 below summarizes records that may relate to the alleged defect in the subject vehicles that GM has identified to date. GM has organized the records by the GM file number within each attachment. Refer to access database "Q_03_REQUEST NUMBER TWO DATA" for categories prescribed by the NHTSA.

	GM Reports	SUBCATEGORIES			
Type of Report		NUMBER WITH PROPERTY DAMAGE	Number With Crash	Number With Fire	NUMBER WITH INJURIES/ FATALITIES*
Owner Reports	0	0	0	0	0/0
Field Reports	25	0	0	0	0/0
Not-In-Suit Claims	0	0	0	0	0/0
Subrogation Claims	0	0	0	0	0/0
Third Party Arbitration Proceedings	0	0	0	0	0/0
Product Liability Lawsuits	0	0	0	0	0/0
Total Reports (Including Duplicates)	25	0	0	0	0/0
Total Vehicles with Reports (Unique VIN)	25	0	0	0	0/0

TABLE 2-1: REPORT CLASSIFICATION – RECORDS THAT MAY RELATE TO THE ALLEGED DEFECT

In response to requests 2c-2f, GM reviewed the incidents with their associated non-privileged records that may have been related to the alleged defect. GM is including those that may be related. GM is providing those non-privileged records and

associated documentation that were reviewed in making that assessment which speak for themselves and may contain information regarding 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 crash is alleged;
 - j. Whether a fire is alleged;
 - k. Whether property damage is alleged;
 - I. Number of alleged injuries, if any; and
 - m. Number of alleged fatalities, if any.

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

The requested information is provided on the ATT_1_GM disk; folder labeled "Q 03". Refer to "Q 03 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.) and describe the method GM used for organizing the documents.

Copies of the records summarized in Table 2-1 are embedded in the file provided in ATT_1_GM disk; folder labeled "Q_03". Refer to the Microsoft Access file labeled "Q_03_REQUEST NUMBER TWO DATA". GM has organized the records by the GM file number within each attachment.

7. Produce the following:

c. Any and all communications between GM and any of the subject component suppliers, sub-suppliers, discrete component manufacturers or other entities involved in the design/manufacture of the subject components, that relate to, or that may relate to, the alleged defect in the subject vehicles.

General Motors requested communications including documents from entities involved in the design/manufacture of the subject components, that relate to, or that may relate to, the alleged defect in the subject vehicles. Documents and supporting information, including those received from other entities, continues to be reviewed. Additional responsive information will be provided by October 25, 2013.

GM is providing responsive non-confidential email communications in the ATT_1_GM disk; in the folder labeled "Q_07c_email". GM is providing non-confidential communication documents and email attachment documents in the ATT_1_GM disk; in the folder labeled "Q_07c_docs".

GM is providing responsive confidential email communications in the ATT_2_GM CONF disk; in the folder labeled "Q_07c_CONFemail". GM is providing responsive confidential communication documents and email attachment documents in the ATT_2_GM CONF disk; in the folder labeled "Q_07c_CONFdocs".

Attachments included in email communications that are responsive to this request and request 9 are being provided in the response to request 9.

- 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 that have been conducted, are being conducted, are planned, or are being planned by, or for, GM. Include any and all actions GM conducted on failed or suspect subject components removed from subject vehicles that were sold or were otherwise outside of GM's control, and include any and all related document for each of these actions. 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.

GM is providing requested information and the location of the responsive documentation, in the ATT_1_GM disk; folder labeled "Q_09", in the file named "Q_09 Actions".

General Motors requested assistance and documents from suppliers in responding to this request. Documents and supporting information, including those received from suppliers, continues to be reviewed. Additional responsive information will be provided by October 25, 2013.

* * *

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 of their past and present officers and employees, whether assigned to their principal offices or any of their 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 January 2006, 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, recordkeeping 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."

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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,

M. Carmen Benavides, Director

Product Investigations and Safety Regulations

Attachments