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INFORMATION ACT (FOIA), 5 U.S.C . 552(B)(6)

**UNITED STATES DEPARTMENT OF TRANSPORTATION  
NATIONAL HIGHWAY TRAFFIC SAFETY ADMINISTRATION**

**In re:**

PE14-002  
Kia Sorento Sunroofs

**GENERAL MOTORS LLC'S RESPONSE TO THE  
GENERAL ORDER DIRECTED TO MANUFACTURERS**

General Motors LLC (“GM”) submits the following report in response to the National Highway Traffic Safety Administration’s (“NHTSA”) General Order Directed to Motor Vehicle Manufacturers dated April 14, 2016 (the “General Order”).

**Preliminary Statement**

Unless otherwise noted, GM’s responses rely on the definitions provided on page 3 of the General Order, as clarified by Elizabeth Mykytiuk of the NHTSA Office of Chief Counsel in an email dated April 21, 2016. GM’s responses relate to 2006 through 2016 model year vehicles manufactured by GM, and are based upon: (i) a reasonable search for and review of relevant GM business records; and (ii) interviews with selected GM personnel familiar with the development, manufacture, and/or performance of panoramic sunroofs in relevant GM vehicles. GM’s responses are based on the information it has reviewed to date and reflect its current information and belief.

**GM’s Responses**

**A. Request 1**

**Request**

Describe the history of panoramic sunroofs in the vehicles you manufacture. Your response should include, but not be limited to, the reason(s) you decided to add panoramic sunroofs as an option, the model(s) and model year for which you first offered this option, and the timeline of the development and decision-making that led to the introduction of panoramic sunroofs.

**GM’s Response**

In the late 1990s, GM began the development and decision-making process that led to the introduction of a panoramic sunroof on the 2004 model year Cadillac SRX. Panoramic sunroofs were shown on competitive vehicle offerings by our supply base, and GM became interested in offering a larger open roof view to our customers. This larger view was seen as a means to generate customer enthusiasm and help to drive sales, profitability, and market share. GM has increased its usage of panoramic sunroofs since the introduction of the 2004 MY Cadillac SRX.

**B. Request 2**

**Request**

Identify and enumerate the total population of vehicles you manufactured that contain a panoramic sunroof as original equipment. Your response should be broken down by make, model, and model year.

**GM's Response**

Table 1 below contains the number of vehicles that GM has manufactured for sale or lease in the United States with a panoramic sunroof as original equipment.

MAKE	MODEL	MODEL YEAR											TOTAL
		2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016	
BUICK	ENCLAVE	0	0	42233	21947	25664	38190	35096	21254	34694	33214	32162	284454
	ENVISION	0	0	0	0	0	0	0	0	0	0	184	184
	LACROSSE	0	0	0	0	24398	27303	24106	18649	16264	16416	15179	142315
CADILLAC	CT6	0	0	0	0	0	0	0	0	0	0	2237	2237
	CTS	28362	30813	44407	34092	23364	27602	24263	15092	698	0	0	228693
	CTS A	0	0	0	0	0	0	0	0	18738	8531	11719	38988
	SRX	15074	12347	15718	5045	45734	53911	62260	46559	48085	54087	42261	401081
	XTS	0	0	0	0	0	0	0	27977	17246	6440	10226	61889
CHEVROLET	IMPALA E	0	0	0	0	0	0	0	0	43159	20505	7021	70685
	MALIBU E2	0	0	0	0	0	0	0	0	0	0	16166	16166
	MALIBU MAXX	10436	3763	0	0	0	0	0	0	0	0	0	14199
	TRAVERSE	0	0	0	22344	18551	27990	19139	14512	21045	21662	18758	164001
GMC	ACADIA	0	20366	42876	17478	21004	44390	51386	30048	46543	54920	40595	369606
HUMMER	H2	13096	7887	8020	1778	0	0	0	0	0	0	0	30781
	H3	45788	34704	21073	5852	2071	0	0	0	0	0	0	109488
	H3T	0	0	0	2380	398	0	0	0	0	0	0	2778
PONTIAC	G6	83911	50318	39339	20214	6904	0	0	0	0	0	0	200686
SAAB	9-4X	0	0	0	0	0	456	0	0	0	0	0	456
	9-5	0	0	0	0	0	1593	0	0	0	0	0	1593
SATURN	ASTRA	0	0	4311	4	0	0	0	0	0	0	0	4315
	AURA	0	29024	19939	9825	13	0	0	0	0	0	0	58801
	OUTLOOK	0	9772	14392	4818	815	0	0	0	0	0	0	29797
TOTAL		196667	198994	252308	145777	168916	221435	216250	174091	246472	215775	196508	2233193

TABLE 1: SUBJECT VEHICLE POPULATION

**C. Request 3**

**Request**

For each panoramic sunroof identified in your Response to Request No. 2, provide the following information: (i) the name and contact information for the sunroof manufacturer; (ii) the number of glass panels; (iii) the size of the glass panel(s) (length X width in centimeters); (iv) the thickness of the glass panel(s) (millimeters); and (v) the standard to which the sunroof was

manufactured. Your response should include an explanation of any changes made between models and model years.

#### **GM's Response**

GM's response to Request 3 is attached as **Exhibit A**. All vehicles listed in response to Request 2 used the same panoramic sunroof in every model year of that vehicle.

#### **D. Request 4**

##### **Request**

Identify, by make, model, and model year, the number of incidents involving an allegation that a panoramic sunroof has spontaneously shattered, and state the number of injuries or fatalities associated with such incidents.

#### **GM's Response**

GM's response to Request 4 is attached as **Exhibit B**.

#### **E. Request 5**

##### **Request**

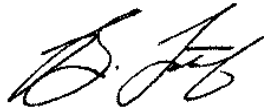
File a report of every incident involving an allegation that a panoramic sunroof has shattered spontaneously in a vehicle manufactured by you, of which you are aware by any means (including but not limited to consumer complaints, lawsuits, and media reports). The report shall include the following information: (i) the date on which you were first notified or learned of the incident; (ii) the name of the individual involved in the incident; (iii) the contact information for counsel representing that individual (if applicable); (iv) the make, model, and model year of the vehicle; (v) the vehicle identification number (VIN); (vi) the date, location, and description of the incident (including whether the vehicle was stationary or in motion when the incident occurred); (vii) the number and description of any injuries or fatalities; (viii) a summary of your current understanding as to the nature of the incident and/or the cause of the breakage (including whether a rock or other item of road debris was found); and (ix) a summary of any other information relevant to your investigation of the incident. Your report should be in the format attached as Exhibit A.

#### **GM's Response**

GM response to Request 5 is attached as Exhibit C. The data in Exhibit C was obtained from a reasonable search of Customer and Relationship Services (CARS) (formerly Customer Assistance Center or "CAC") database, Technical Assistance Center ("TAC") database and Team Connect Data Warehouse (Team Connect). It contains customer allegations, dealer observations, and other third-party allegations that GM copied verbatim from these sources and that GM has not independently verified. GM has not investigated these claims and therefore has not made a determination regarding the nature of the underlying incident and the root cause of any alleged sunroof failure.

Please contact me if you require further information.

Sincerely,

A handwritten signature in black ink, appearing to read 'B. Latouf', written in a cursive style.

Brian Latouf, Executive Director  
Global Safety and Field Investigations  
Regulation and Certification

**Attachments**

Exhibit A: Response to request 3

Exhibit B: Response to request 4

Exhibit C: Response to request 5