



GENERAL MOTORS LLC
Global Vehicle Safety

November 5, 2014

Frank Borris
Director, Office of Defects Investigation
National Highway Traffic Safety Administration
West Building W45-302
1200 New Jersey Ave, SE
Washington, DC 20590

N140735
14V-655/14V-471
Takata Air Bags

Dear Mr. Borris:

This letter contains General Motors LLC's ("GM") response to David Friedman's letter dated October 29, 2014, regarding the safety risk posed by defective Takata air bags and information on GM's efforts to ensure vehicles are remedied as expeditiously as possible.

Mr. Friedman's questions and our corresponding replies are as follows:

- 1. The steps that you will take to (a) expedite Takata's production of replacement air bags; (b) expand the supply of replacement air bags by obtaining replacement air bags from other suppliers; (c) accelerate distribution of replacement air bags to repair facilities; and (d) urge and incentivize your dealers to increase the number of vehicles repaired.**

(a) To address the safety issue from Takata air bags in GM vehicles, GM is working with Takata to speed up the distribution of replacement air bags for the Pontiac Vibe vehicles included in Toyota safety recall 14V-655 and Saab 9-2X vehicles included in Subaru safety recall 14V-471 through the following actions:

- Provide a convenient dealer mailing list so that Takata can get CHEMTREC Customer Numbers (CCN) assigned quickly, allowing dealers to ship air bag inflators, which are considered hazardous material, back to Takata without delay.
- Provide the CCN list in the Technical Service Bulletin and in the part shipping box to make it convenient for dealers to locate the CCN for the ship-back paper work.
- Replace inflators instead of entire air bag assemblies so that the maximum use can be made of existing parts.



- (b) Airbags are not parts that are generally interchangeable or can be safely replaced with other airbags designed for a different vehicle or application. Further, GM does not engineer air bags as part of its business and does not own the engineering documentation for these Takata airbags. As a result, GM cannot quickly obtain validated replacement air bags from other suppliers that can be used in these applications.
- (c) All parts are shipped overnight or faster in order to expedite repairs for customers as quickly as possible.
- (d) All VINs are loaded into the GM Global Warranty Management (GWM) system as a Required Field Action and listed specifically as a Safety Recall.

2. The measures (including innovative approaches) that you will take to encourage and incentivize vehicle owners to bring their vehicles in for repair (e.g., expanding service hours for more convenience, accommodating owners whose vehicles cannot immediately be repaired by providing loaner vehicles, and the use of print, radio, television, and social media to inform vehicle owners of the recall program).

For Toyota recall 14V-655 and Subaru recall 14V-471 GM has sent letters to Pontiac Vibe and Saab 9-2X owners with vehicles currently or ever registered in the regions identified in these recalls. These letters were sent via Federal Express instead of regular first-class mail to (1) emphasize the importance of this recall and (2) document that these owners received the letter.

As noted in GM's letters to affected owners, GM will provide loaner vehicles to owners whose vehicle repair is delayed by parts availability.

All VINs are loaded on the GM Recall VIN Look-up website where owners can quickly determine if their vehicle is impacted.

GM will include all unrepaired VINs in its quarterly post card reminder program to assure that owners get multiple communications to bring their vehicles in to get the repair performed.

3. The efforts you will make to maintain clear, thorough, and up-to-date information regarding the recall on your website, and within your dealer network, to better inform consumers.

All the VIN and recall information is loaded on the GM Recall VIN Lookup site.

All VINs are loaded in the Required Field Action section of the GM Global Warranty Management System as a Safety Recall, which is displayed to dealers upon VIN lookup when an owner inquires.

GM has broadcast specific communications within the dealer network to provide dealers the information required to undertake the necessary repairs or provide loaner vehicles, as appropriate.

4. Any other interim measures you have taken or can take to address the safety risk and up-to-date information on the number of loaner vehicles you have provided.

GM launched the Pontiac Vibe recall 14V-655 on October 23, 2014 and has confirmation of 35 claims for the air bag repair as of October 30, 2014.

For recall 14V-471, owner notification letters were sent to owners of Saab 9-2X vehicles via Federal Express on October 31, 2014 and GM will be monitoring those claims in the coming weeks.

5. A description of any ongoing efforts to evaluate the safety risks of Takata air bags in your vehicles, including a description of testing that is currently underway or planned.

GM is not directly involved with testing other than supporting the return of replaced air bags to Takata for Takata's testing as previously requested by NHTSA. Because Takata designed and engineered the suspect airbags, Takata is in the best position to evaluate these parts. GM has chosen not to divert returned parts from Takata for GM's own testing as this could be counterproductive to Takata's efforts.

GM recently sent Takata a list of claims for dealer repairs in the South Florida area, so that Takata could target those air bags as high-priority for testing when the air bags are received by Takata.

GM is following up with Takata to understand the results of Takata's evaluation of the returned parts.

6. Testing results and data that you have conducted or gathered concerning your vehicles that contain Takata air bags that were sold or registered within the hot, humid regions of the country identified in NHTSA's consumer advisory.

As noted above, GM is not directly involved in testing but is supporting Takata's testing program through the return of replaced air bags and providing information

about the repair location of the affected vehicles. This enables Takata to test air bags from these regions in a priority fashion.

7. Testing results and data that you have conducted or gathered concerning your vehicles that contain Takata air bags that were sold or registered outside of the hot, humid regions of the country identified in NHTSA's consumer advisory.

GM is sending all air bags replaced as part of GM Safety Recall 14V-312 to Takata. GM's understanding is that Takata is providing the test results directly to NHTSA. Takata has not yet provided those test results to GM, but GM has requested them.

8. The testing protocols/methodologies used (or that will be used) to conduct or gather the information described in Nos. 5 through 7 above.

GM has not yet received specific information from Takata on the testing methodologies for returned parts, but GM has requested this information.

9. Up-to-date information regarding the number of vehicles covered by your recall, the number of those vehicles still in service and the number of vehicles remedied with a replacement air bag.

The original Pontiac Vibe Recall 13V-133 impacted 84,447 2003 and 2004 MY Pontiac Vibes. GM replaced inflators in 5,064 of these vehicles prior to the launch of 14V-312. Safety Recall 14V-312 removed the direction to inspect vehicles, and mandated replacing inflators in all of the affected vehicles. Since the launch of 14V-312 in August 2014, GM dealers have repaired 7,444 vehicles. There are 71,939 remaining vehicles in the recall population in the US and Canada.

In October 2014, GM launched recall 14V-655 which included the Pontiac Vibe which are currently or were previously registered in Florida, Hawaii, Puerto Rico, Guam, The US Virgin Islands, Saipan, US Samoa and certain gulf coast states in the US. This recall targets 13,729 vehicles. As of October 30, 2014, 35 vehicles have been repaired.

GM also launched recall 14V-471 for 502 Saab 9-2X vehicles which are currently or were previously registered in Florida, Hawaii, Puerto Rico and the US Virgin Islands. Owner letters were sent via Federal Express on October 29, 2014. At this time, GM does not yet have repair data for those vehicles.

In summary of the 98,678 vehicles which are part of the above recall populations, 12,543 have been repaired as of October 30, 2014.

10. Information on the testing, if any, you have done on the replacement air bags.

As noted above, GM is not actively involved with any testing on the suspect air bags. However, GM is supporting Takata in Takata's testing program.

Sincerely,

A handwritten signature in black ink, appearing to read "Jeffrey Boyer". The signature is fluid and cursive, with the first name "Jeffrey" and last name "Boyer" clearly distinguishable.

Jeffrey Boyer
Vice President, Global Vehicle Safety