



GENERAL MOTORS LLC
Global Vehicle Safety

November 25, 2019

Gregory Magno, Chief
Vehicle Defects Division – A
Office of Defects Investigation
National Highway Traffic Safety Administration
1200 New Jersey Avenue SE
Room W48-334
Washington, DC 20590

G227939

NEF-101jx
PE19-013

**Re: General Motors LLC's Supplemental Response to NHTSA's September 25, 2019
Information Request 2-4 Investigation PE19-013**

Dear Mr. Magno:

This letter contains General Motors LLC's ("GM") supplemental responses to the information requests in your September 25, 2019 letter (the "**Requests**") relating to National Highway Traffic Safety Administration ("NHTSA") Preliminary Evaluation 19-013, which is a NHTSA investigation of "allegations of Passenger Sensing System (PSS) malfunction in certain model year (MY) 2012-2013 Chevrolet Volt vehicles." This supplement includes additional claims that were inadvertently not included in GM's November 14, 2019 response to Requests 2-4.

Unless otherwise defined herein, GM's responses rely on the defined terms in the Requests. GM's document production for this supplement does not contain any confidential information and a copy of the supplement compact disc titled ATT_1_GM will not be supplied to the NHTSA Office of Chief Counsel. GM incorporates by reference its November 14, 2019 response.

REQUESTS AND RESPONSES

REQUEST 2:

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. 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 "f," 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 “e” and “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.

SUPPLEMENTAL RESPONSE TO REQUEST 2:

After GM’s November 14, 2019 response was submitted, GM identified additional claims for the Subject Vehicles that may relate to the Alleged Defect that were not included in Response 2 due to a computer processing issue—i.e., an error with GM’s data search and retrieval tool for Customer Assistance Center (“CAC”) claims. Once the tool was fixed, a subsequent data search revealed 12 additional unique CAC claims for a “Service Airbag Light” issue involving the Subject Vehicles that may be responsive to Request 2.¹ Six of the additional twelve CAC claims were already reported in GM’s November 14, 2019 response to Request 5 as a warranty claim. None of these additional CAC claims alleged an accident, injury, fatality, fire, property damage or asymmetric deployment.

Adding these 12 additional unique CAC claims to the total unique claims from the November 14, 2019 response would make a total of 143 unique claims as summarized in Table 2-1S below.

TYPE OF REPORT	GM REPORTS	SUBCATEGORIES				
		CORRESPONDING TO NHTSA REPORTS	NUMBER WITH PROPERTY DAMAGE	NUMBER WITH CRASH	NUMBER WITH INJURIES	NUMBER WITH FATALITIES
Owner Reports	120	5	0	0	0	0
Field Reports	42	1	0	0	0	0
Not-In-Suit 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)	162	6	0	0	0	0
Total Vehicles with Reports (Unique VIN)	143	5	0	0	0	0

TABLE 2-1S: SUMMARY OF CLAIMS FOR “SERVICE AIRBAG LIGHT ON” THAT MAY BE RESPONSIVE TO REQUESTS 2A-2F

A summary of the alleged defect, causal and contributing factors, and GM's assessment based on underlying facts and evidence was provided in GM’s November 14, 2019 response to Request 12. The rate provided in the previous response would be substantially the same since most of the additional claims were already included as a warranty claim.

¹ General claims of “airbag light on” or “service airbag message” with no reference to a DTC or component that could not be tied back (warranty, part sales or other diagnostics) to the source of the light or message were not included as responsive records.

REQUEST 3:

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), street address, email address and telephone number;
 - d. Vehicle's VIN;
 - e. Vehicle's model year;
 - f. Vehicle's mileage at time of incident;
 - g. Incident in ("yyyy/mm/dd" date format);
 - h. Report or claim date (in "yyyy/mm/dd" date format);
 - i. The stature (weight and height) of the occupant in the passenger seat, if known;
 - j. Whether a crash is alleged;
 - k. Whether property damage is alleged;
 - l. 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."

SUPPLEMENTAL RESPONSE TO REQUEST 3:

GM has produced the requested information for the additional CAC claims on the ATT_1_GM disc in the folder labeled "Q_03S." Refer to the Microsoft Access 2010 file labeled "Q_03S_REQUEST NUMBER TWO DATA."

REQUEST 4:

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. Describe in detail the search methods and search criteria used by GM to identify the items in response to Request No. 2.

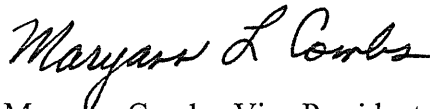
GM RESPONSE:

GM is producing the responsive, nonprivileged documents associated with the additional responsive CAC claims. GM has produced these records in the Microsoft Access file labeled "Q_03S_REQUEST NUMBER TWO DATA" on the ATT_1_GM disc in the folder labeled "Q_03S." To assist in the identification of the documents referenced in the summaries provided in GM's response to Request 2, GM has organized the records by the GM file number.

CONCLUSION

Please contact me if you require further information about this response or the nature or scope of our searches.

Sincerely,

A handwritten signature in black ink, reading "Maryann L. Combs". The signature is fluid and cursive, with the first name "Maryann" and last name "Combs" clearly legible.

Maryann Combs, Vice President
Global Vehicle Safety

cc: Mr. Chris Lash
Ms. Jisan Xue
ODI_IRresponse@dot.gov

Enclosures

ATT_1_GM: Public copy of GM's document production