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December 12, 2019

U.S. Department of Transportation
National Highway Traffic Safety Administration
1200 New Jersey Avenue, SE
Washington, DC 20590

Dan Rabinovitz
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Mr. Rabinovitz,

Per our previous communications, please find the updated request for a NHTSA Defect Petition for the Saturn Sky and Pontiac Solstice. This revised petition is being submitted as a secondary action regarding the initial request for a NHTSA Defect Petition for the Saturn Sky and Pontiac Solstice that was submitted on Sunday, November 03, 2019 at 11:17 PM to the following representatives: Elaine L. Chao, Stephen Ridella, James Owens, and Barbara McCann. Further, this updated and revised petition is being resubmitted in order to meet 49 CFR 555.24 petition requirement for the inclusion of an address. I reiterate that I am formally requesting a NHTSA Defect Petition for the Saturn Sky and Pontiac Solstice.

Within the scope of this communication, I am presenting evidence and data (in some cases in the form of links) to support that the NHTSA CAMPAIGN NUMBER: 15V421000 should have appropriately included the Saturn Sky and the Pontiac Solstice 2006-2010 model years, as the components from the Humvee were a common component that was also cross-used on these vehicles. Within the confines of this communication, some items may be repetitive and seem repetitive, as this revised petition request is the inclusion of other information that had been separately submitted.

Further, within the scope of these communications, I will demonstrate the defect found in the defective part(s) is the same concern and is not isolated to the Humvee under campaign 15V421000 and that the make of the vehicle does not lead to the fears of the potential fire hazard, but the installation of said part(s) and said part(s).

After further review of the NHTSA site, some complaints went across several years of both models of the Saturn Sky and the Pontiac Solstice. NHTSA ID NUMBER: 11258408, NHTSA ID NUMBER: 10735178, NHTSA ID NUMBER: 11258408, NHTSA ID Number: 10876600, NHTSA ID Number: 11019883, and NHTSA ID Number: 10531789.

Therefore, I am requesting a formal NHTSA Defect Petition of the 2006-2010 model years of the Saturn Sky and the Pontiac Solstice. All the vehicles were manufactured under GM. As a point to this NHTSA Defect Petition on the Sky and the Solstice, I am requesting that these vehicles be joined under the same scope of review as the Humvee as recalled under NHTSA CAMPAIGN NUMBER: 15V421000. As previously expressed, the parts that were used in the manufacturing of the Humvee. The Sky and Solstice were manufactured from a hodgepodge of components to reduce cost. As identified in a 2013 article, *the car was built on an all-new compact rear platform, dubbed Kappa, but relied heavily on parts borrowed from other GM vehicles to control costs. The Cadillac CTS donated a differential and automatic transmission, while other bits came from the Hummer H3, Chevy Colorado, Cadillac XTS, and Cobalt/G5. Even the GMC Envoy, Opel Corsa, and Fiat Barchetta were part donors, according to GM, giving the Solstice backup lights, seat frames and side-view mirrors, respectively.* (<https://grassrootsmotorsports.com/articles/buyers-guide-other-roadster/>).

I am providing additional, frequent, and quickly found knowledge and information to continue to try and show the government, especially the NHTSA, that the Saturn Sky and the Pontiac Solstice have the same defective parts that were attached to the Humvee as recalled under NHTSA CAMPAIGN NUMBER: 15V421000. The information is indicating that the HVAC Blower Motor Fan Resistor is faulty, and the unit will overheat and melt. (picture attached). Again, as I had previously stated, the differences in the builds of the Humvee, the Sky and the Solstice are not the central part failure factors. The influencing concern is clearly defined to the defective parts that were installed in all three vehicles and this is not a coincidence. These defective part(s) are placing the vehicle owners at a safety risk.

Further, it is hard, as a quality professional, to understand how the NHTSA did not complete a thorough review of the parts, part interchangeability, and reuse of the common components across multiple vehicle platforms. It appears that the research ended with the belief that the issue's common problem was limited to the one vehicle platform, and due diligence was not completed on the individual part(s) that had the concern.

In the original complaint, I attached two automobile forum links that pointed to the fact that this issue was a concern and is continually being discussed by vehicle owners. In reviewing additional concerns online, it was noted about the defective parts in an article titled *Pontiac Solstice, Saturn Sky Share Same Fire-Risk Parts with Hummer H3, 2015*, from The Truth About Cars Journal by AutoGuide.com, and the article clearly identifies that my concern that I had submitted is valid and has safety concern merits. (Article is attached, and here is the link to the original - <https://www.thetruthaboutcars.com/2015/07/pontiac-solstice-saturn-sky-catching-fire-due-parts-hummer-h3-recall/>).

Additionally, here are some additional forum links that clearly indicate the problems of the defective parts and the methods (in some cases, not safe) trying to repair a known faulty problem at home - <https://www.solsticeforum.com/threads/heater-ac-blower-stopped->

[working.68002/ \(2011\)](https://www.skyroadster.com/forums/f2/why-did-my-blower-motor-resistor-wiring-harnas-hot-wire-burn-off-41356/) and [https://www.skyroadster.com/forums/f2/why-did-my-blower-motor-resistor-wiring-harnas-hot-wire-burn-off-41356/ \(2012\)](https://www.skyroadster.com/forums/f2/why-did-my-blower-motor-resistor-wiring-harnas-hot-wire-burn-off-41356/).

With the resources that the NHTSA has, it is hard to fathom that a reporter with an online magazine in 2015 was able to clearly identify the defective component parts, go through your database (examples are identified within the article), and show examples of customer complaints, call out the manufacturer's refusal to repair under NHTSA CAMPAIGN NUMBER: 15V421000, until your agency threatened GM with a formal investigation. (I have three additional articles that cover the fact that NHTSA had to push to have the original fire concern covered)(<https://www.thetruthaboutcars.com/2015/07/report-hummer-recall-happened-nhtsa-threatened-gm/>, <https://jalopnik.com/gm-didnt-recall-the-hummer-over-fires-until-the-feds-th-1717581525>, and https://jalopnik.com/gm-recalling-200k-hummers-after-underestimating-number-1716629354#_ga=1.199293484.383346299.1428610888).

The use of the parts and the failure rate of these is so well established that Dorman, the auto-parts manufacturer and supplier, has created a repair kit (this repair kit can also be found by other manufacturers) for these vehicles. It is not a coincidence or accident that the repair kit happens to fit the Hummer, the Sky and the Solstice, all within the same respective years of one another. Again, this is not a coincidence, the vehicle structure, the build of the Hummer, does not possess a quality or lack thereof that only allows for the defect to happen in the Hummer, as the same defect with the defective parts is also happening within the Saturn Sky and the Pontiac Solstice. The issue of the overheating parts that were used in the Hummer, the Sky and the Solstice and the problem all tracks back to the same defective parts that were used in all 3 of these vehicles. Dorman Part# 973-510 Blower Motor Resistor Kit with Harness Application Summary: Chevrolet 2006, Hummer 2010-06, Pontiac 2009-06, Saturn 2010-07.

Perhaps, the lack of the NHTSA investigation is what afforded your agency the ability to MISS and not clearly understand part interchangeability within the automotive industry. As the industry continues to get smaller, and companies try to maintain company resource sharing, the use of parts across multiple platforms is only going to get worse. I am sure that your agency can see this with the cluster that we call the **Takata Airbag fiasco**.

These are component parts/parts that clearly are the same parts that were used under the NHTSA CAMPAIGN NUMBER: 15V421000 and parts that should have been identified within the scope of the original campaign and covered for repair.

Again, I am requesting a formal NHTSA Defect Petition of the 2006-2010 model years of the Saturn Sky and the Pontiac Solstice that will allow for the same, if not better repair that fell under the scope of the NHTSA CAMPAIGN NUMBER: 15V421000 that afforded that GM recall specific model year 2006-2010 Hummer H3 vehicles manufactured February 5, 2005, to May 24, 2010, and 2009-2010 Hummer H3T vehicles manufactured May 21, 2008, to May 24, 2010. In the affected vehicles, the connector module that controls the blower motor speed for the

heating, ventilation and air conditioning system may overheat. If the blower motor connector module overheats, it can increase the risk of a fire.

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