



GENERAL MOTORS LLC
Global Vehicle Safety

April 1, 2021

Tanya Topka, Chief
Vehicle Defects Division – A
Office of Defects Investigation
National Highway Traffic Safety Administration
1200 New Jersey Ave., SE
Room W48-334
Washington, DC 20590

VIA EMAIL

G232008

NEF-101aa
PE20-016

**Re: General Motors LLC's Responses to NHTSA's February 11, 2021 Information Request
in Investigation PE20-016**

Dear Ms. Topka:

This letter contains General Motors LLC's ("GM") responses (the "**Responses**") to the information requests in your February 11, 2021 letter (the "**Requests**") relating to National Highway Traffic Safety Administration ("NHTSA") Preliminary Evaluation 20-016. Unless otherwise defined herein, GM's Responses rely on the defined terms in the Requests.

PRELIMINARY STATEMENT

GM prepared its Responses by: (i) identifying, in consultation with the appropriate GM business personnel, the primary electronic databases and document repositories in GM's custody and control that store potentially responsive documents and information in the ordinary course of business, as more fully identified in the Responses below; and (ii) conducting a reasonable search, as appropriate, of these databases and document repositories for responsive documents and information. GM objects to the definitions of "document" and "GM" in the Requests as overbroad, unreasonably burdensome, and not reasonably tailored to records that might be expected to bear relevant and responsive information. GM's document production does not contain: (i) attorney-client privileged information or information protected as attorney-work product; and (ii) documents generated or archived in these locations after the dates that GM conducted its final searches. GM construes the Information Request as pertaining to vehicles manufactured for sale in the United States and its territories.

GM's document production is contained in the folder titled G232008_1_GM. Certain portions of these documents are exempt from public disclosure under the Freedom of Information Act (5 U.S.C. § 552(b)(4)) ("**FOIA**") and 49 CFR part 512, and have been redacted in the copy contained in the folder. GM has submitted the unredacted nonpublic copy of its document production (in the folder titled G232008_2_GM_CONF) to the NHTSA Office of Chief Counsel under 49 C.F.R. part 512.

Some of the documents in GM's production contain personally identifiable information ("**PII**") (e.g., vehicle registration information or VIN,

employee names, and customer/employee contact information). GM today submits documents with unredacted PII with the understanding that NHTSA (or GM, if NHTSA prefers) will redact any PII before disclosing these documents to the public

REQUESTS AND RESPONSES

REQUEST 1:

State, by model and model year, the number of subject vehicles GM has manufactured for sale or lease in the United States. Separately, for each subject vehicle manufactured to date by GM, state the following:

- a. Vehicle identification number (VIN);
- b. Make;
- c. Model;
- d. Model Year;
- e. Subject component part number(s) and design version(s) installed as original equipment;
- f. Date of manufacture;
- g. Date warranty coverage commenced; and
- h. The State in the United States where the vehicle was originally sold or leased (or delivered for sale or lease).

Provide the table in Microsoft Access 2010, or a compatible format, entitled "PRODUCTION DATA."

GM RESPONSE:

In response to your request that GM "state, by model and model year, the number of subject vehicles GM has manufactured for sale or lease in the United States," GM provides the following table:

MAKE	MODEL	MODEL YEAR				TOTAL
		2017	2018	2019	2020	
Chevrolet	Bolt EV					
Chevrolet	Bolt EV-Inc ¹					
	Total					

GM has produced the information requested in subparts (a) through (h) in the G232008_1_GM folder in the subfolder labeled "Q_01". Refer to the Microsoft Access 2010 file labeled "Q_01_PRODUCTION DATA."

¹ The Bolt EV-Inc is a fleet-specific variant used as a light cargo vehicle (LCV).

REQUEST 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 “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.

GM RESPONSE:

In response to subparts (a) through (g) for the subject vehicles (as defined in the Requests, the “**Subject Vehicles**”), GM provides the following table, which GM prepared by conducting a reasonable keyword search for potentially responsive claims.²

² Table 2-1 does not include NHTSA VOQs. GM searched the following databases and information sources for responsive information: Customer Assistance Center (CAC), Product Assistance Center (PAC), Business Resource Center (BRC), Technical Assistance Center (TAC), Field Information Network Database (FIND), Company Vehicle Evaluation Program (CVEP), Captured Testing Fleet (CTF), COMPASS, Early Quality Feedback (EQF), Problem Resolution Tracking System (PRTS), Field Product Report Database (FPRD), Global Incident Management System (GIMS), and GM Legal records.

[REDACTED]

As summarized in Table 2-1, [REDACTED]

[REDACTED]. In determining the responsiveness of a claim, GM erred on the side of coding the claim as responsive, even if the evidence in GM's possession linking the claim to the alleged defect (as defined in the Requests, the "**Alleged Defect**") was implausible, inconclusive, or circumstantial. Accordingly, the claim totals in Table 2-1 are conservative.

In response to subparts "f" and "g," GM is producing the responsive, nonprivileged litigation records relating to the litigation cases listed above in Table 2-1. These records contain the requested 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.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

3

[REDACTED]

4

[REDACTED]

REQUEST 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 another identifier used by GM;
- 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 make, model and model year;
- f. Vehicle's mileage at time of incident;
- g. Incident date;
- h. Report or claim date;
- i. Whether a fire is alleged;
- j. Whether the fire occurred when the ignition key was turned off or on
- k. Whether the fire occurred while charging
- l. If available, state of level of battery charge
- m. Whether property damage is alleged;
- n. Number of alleged injuries, if any; and
- o. Number of alleged fatalities, if any.

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

GM RESPONSE:

GM has produced the requested information for the Subject Vehicles in the G232008_1_GM folder in the subfolder labeled "Q_03". Refer to the Microsoft Access 2010 file labeled "Q_03_REQUEST NUMBER TWO DATA."

REQUEST 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:

With respect to Request 4, GM CAC, PAC, TAC and Legal records are GM's primary repositories of potentially responsive documents in the ordinary course of business. GM identified responsive documents by conducting a keyword search of these records for potentially responsive claims and reviewed the associated claim file to confirm the responsiveness of the claim. GM is producing the responsive, nonprivileged documents associated with responsive claims listed in Table 2-1 in the Microsoft Access file labeled "Q_03_REQUEST NUMBER TWO DATA" in the subfolder labeled "Q_03" in the G232008_1_GM folder. GM has organized the records by the GM file number.

Additionally, this response was compiled and prepared upon review of documents produced by various GM locations. This response does not include documents generated or received at those GM locations after their searches.

REQUEST 5

State, by model and model year, a total count for all of the following categories of claims, collectively, that have been paid by GM to date that relate to, or may relate to, the alleged defect in the subject vehicles: warranty claims; extended warranty claims; claims for good will services that were provided; field, zone, or similar adjustments and reimbursements; and warranty claims or repairs made in accordance with a procedure specified in a technical service bulletin or customer satisfaction campaign.

Separately, for each such claim, state the following information:

- a. GM's claim number;
- b. Vehicle owner or fleet name (and fleet contact person), street address, email address and telephone number;
- c. VIN;
- d. Repair date (in "yyyy/mm/dd" date format);
- e. Vehicle mileage at time of repair;
- f. Repairing dealer's or facility's name, telephone number, city and state or ZIP code;
- g. Labor operation number(s);
- h. Problem codes;
- i. Diagnostic trouble codes;
- j. Replacement part number(s) and description(s);
- k. Concern stated by customer;
- l. Cause as stated on the repair order;
- m. Correction as stated on the repair order; and
- n. Additional comments, if any, by dealer/technician relating to claim and/or repair.
- o.

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

GM RESPONSE

To collect warranty data responsive to this request, GM conducted a reasonable keyword search of the GM Global Analysis and Reporting Tool (“**GART**”), GM’s primary repository of potentially responsive warranty claim information in the ordinary course of business. GM searched for responsive claims using all labor codes associated with the Subject Component within the GM warranty system.⁵ [REDACTED]

REQUEST 6

Describe in detail the search methods and search criteria used by GM to identify the claims in response to Request No. 5, including the labor operations, problem codes, diagnostic trouble codes, part numbers and any other pertinent parameters used.

Provide a list of all labor operations, labor operation descriptions, problem codes, and problem code descriptions, diagnostic trouble codes and diagnostic trouble code descriptions applicable to the alleged defect in the subject vehicles. State whether the diagnostic trouble codes are automatically reported to the warranty database electronically or manually entered into the warranty database by a claims administrator.

State, by make and model year, the terms of the new vehicle warranty coverage offered by GM on the subject vehicles (i.e., the number of months and mileage for which coverage is provided and the vehicle systems that are covered). Describe any extended warranty coverage option(s) that GM offered for the subject vehicles and state by option, model, and model year, the number of vehicles that are covered under each such extended warranty.

GM RESPONSE:

[REDACTED]

⁵ GART does not contain the vehicle owner’s name or telephone number. Additionally, some replacement part numbers, part descriptions and customer concern code descriptions are not included in the GM warranty database. In response to subpart (j), the diagnostic trouble code (DTC) is not captured separately and, if available, is included in one of the verbatim fields.

⁶ GM identified responsive records based on the information supplied to GM by the servicing dealerships, which can contain material errors and omissions. Warranty records, for example, do not always accurately or completely describe the condition of the allegedly defective part at the time of the warranty correction, and service personnel may not consistently classify warranty repairs using the correct labor and trouble codes.

Table 6-1 summarizes the terms of new vehicle warranty coverage offered by GM on the Subject Vehicles:

MODEL YEAR	MAKE	WARRANTY TYPE	WARRANTY TERMS
MY17-20	Chevrolet Bolt	Limited Bumper-To-Bumper	3 yr/36,000 mi basic 5 yr/60,000 mi powertrain
		HV Battery	8 yr/100,000 mi

TABLE 6-1: NEW VEHICLE WARRANTY COVERAGE OFFERED BY GM ON SUBJECT VEHICLES

Many different optional extended warranty plans were available for the Subject Vehicles through GM dealerships. These plans were offered at different prices and for varying lengths of time, based on a customer's preference.

REQUEST 7

Produce copies of all service, warranty, and other documents that relate to, or may relate to, the alleged defect in the subject vehicles, that GM has issued to any dealers, regional or zone offices, field offices, fleet purchasers, or other entities. This includes, but is not limited to, bulletins, advisories, informational documents, training documents, or other documents or communications, with the exception of standard shop manuals. Also include the latest draft copy of any communication that GM is planning to issue within the next 120 days.

GM RESPONSE:

The documents that are responsive to Request 7 are in the G232008_1_GM folder in the subfolder labeled "Q_07". GM's submission does not include incomplete/draft documents associated with GM's final remedy campaign for the Recall, which is scheduled to take place in April 2021. GM will submit these documents to NHTSA via the NHTSA recall portal as required by 49 CFR part 573.

REQUEST 8

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. 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 RESPONSE:

GM identified responsive production investigations by conducting a reasonable search in GM's Global Vehicle Safety-Case Observation Review and Evaluation ("GVS-CORE") database, which is the primary electronic records database for GM's Safety and Field Investigations organization. [REDACTED]

[REDACTED]	
[REDACTED]	
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	
[REDACTED]	
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	

- a. The date or approximate date on which the modification or change was incorporated into vehicle production;
- b. A detailed description of the modification or change;
- c. The reason(s) for the modification or change;
- d. The part number(s) (service and engineering) of the original component;
- e. The part number(s) (service and engineering) of the modified component;
- f. Whether the original unmodified component was withdrawn from production and/or sale, and if so, when;
- g. When the modified component was made available as a service component; and
- h. Whether the modified component can be interchanged with earlier production components.

Also, provide the above information for any modification or change that GM is aware of which may be incorporated into vehicle production within the next 120 days.

GM RESPONSE:

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[illegible]

[REDACTED]

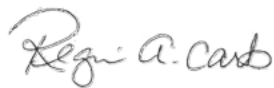
[REDACTED]

[REDACTED]

CONCLUSION

GM's Responses are based upon its investigation to date and reflect its current information and belief. GM reserves the right to supplement or amend its Responses as appropriate. Please contact me if you require further information about this response or the nature or scope of our searches.

Sincerely,



Regina Carto, Executive Director
Global Safety and Field Investigations

cc: Mr. Chris Lash
Mr. Alex Argent
ODI_IRresponse@dot.gov

[REDACTED]