



September 9, 2022

Sharon Yukevich, Chief
Vehicle Defects Division – A
Office of Defects Investigation
National Highway Traffic Safety Administration
1200 New Jersey Ave., SE
Washington, DC 20590

VIA EMAIL
G237837
NEF-101smo
PE22-006

Subject: General Motors LLC’s Responses to NHTSA’s July 28, 2022, Information Request in Investigation PE22-006

Dear Ms. Yukevich:

This letter contains General Motors LLC’s (“GM”) responses (the “Responses”) to the information requests in your July 28, 2022, letter (the “Requests”) relating to National Highway Traffic Safety Administration (“NHTSA”) Preliminary Evaluation 22-006, which is a NHTSA investigation of “allegations of failure of the rear-view camera image to display properly in certain model year (MY) 2020-2021 Cadillac XT5, XT6 and GMC Acadia vehicles.” The Responses included in this letter address Requests 1, 9-11 and 13. GM requested and was granted an extension to supplement this letter with responses to Requests 2-8, 12, and 14-15 by September 30, 2022. 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 G237837_1_GM. Certain

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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 G237837_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 (17-character VIN);
- b. Make;
- c. Model;
- d. Model Year;
- e. Subject component part number and design version(s) installed as original equipment;
- f. Date of manufacture (MM/DD/YYYY);
- g. Date warranty coverage commenced (MM/DD/YYYY); and
- h. The State in the United States where the vehicle was originally sold or leased, or delivered for sale or lease (postal abbreviation).

Provide the table in Microsoft Access 2010, or a compatible format, entitled “**PRODUCTION DATA.**” A pre-formatted data collection file, which provides further details regarding this submission, will be provided to you.

GM RESPONSE:

Table 1-1 summarizes the number of subject vehicles (as defined in the Requests, the “**Subject Vehicles**”) that GM has manufactured for sale or lease in the United States.

MAKE	MODEL	MODEL YEAR		TOTAL
		2020	2021	
Cadillac	XT5	33,881	32,341	66,222
Cadillac	XT6	31,500	21,202	52,702
GMC	Acadia	64,176	68,932	133,108
TOTAL		129,557	122,475	252,032

TABLE 1-1: SUBJECT VEHICLE POPULATION

GM has produced the information requested in subparts (a) through (h) in the G237837_1_GM folder in the subfolder labeled “Q_01”. Refer to the Microsoft Access 2010 file labeled “Q_01_PRODUCTION DATA.”

In response to subpart (e), the subject component (as defined in the Requests, the “**Subject Component**”) is part of assembly to either the main body wiring harness or the instrument panel wiring harness, depending on the vehicle, and is not a traceable component by VIN. For information on the changes to the Subject Component please see GM’s response to Requests 11 and 13.

REQUEST 9

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:

Table 9-1 summarizes the terms of new vehicle warranty coverage offered by GM on the Subject Vehicles:

MODEL YEAR	MAKE	WARRANTY TYPE	WARRANTY TERMS
2020-2021	Cadillac	Limited Bumper-To-Bumper	4 years / 50,000 miles
2020-2021	GMC	Limited Bumper-To-Bumper	3 years / 36,000 miles

TABLE 9-1: 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 10

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 10 are in the G237837_1_GM folder in the subfolder labeled “Q_10”.

REQUEST 11

Describe in detail the differences in the Subject Component design, material composition, and vehicle installation between the Subject Vehicles and subsequent model year versions of the Subject Vehicles.

GM RESPONSE:

The Subject Component’s crimping process was modified in MY21 in the Subject Vehicles as detailed in the response to Request 13. No further changes were made to the Subject Component in the Subject Vehicles due to the alleged defect (as defined in the Requests, the “**Alleged Defect**”) for subsequent model year versions of the Subject Vehicles.

REQUEST 13

Describe all modifications or changes made by, or on behalf of, GM in the design, material composition, manufacture, quality control, supply, or installation of the subject component, from the start of production to date, which relate to, or may relate to, the alleged defect in the subject vehicles. For each such modification or change, provide the following information:

- 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.

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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:

A summary of the modifications to the Subject Component in the Subject Vehicles which relate to the Alleged Defect is provided in the G237837_2_GM_CONF folder; subfolder labeled "Q_13".

CONCLUSION

GM's Responses are based upon its investigation to date and reflect its current information and assessment. GM will supplement this letter with responses to Requests 2-8, 12, and 14-15.

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

Sincerely,



Sabrina Groshek, Executive Director
Global Systems and Product Investigations

cc: Stefanie Oldenburg
ODI_IRresponse@dot.gov

Enclosures

G537837_1_GM – Public copy of GM's document production