INFORMATION REDACTED PURSUANT TO THE FREEDOM OF INFORMATION ACT (FOIA), 5 U.S.C. 552(B)(6)

July 21, 2026

Tanya Topka
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Office of Defects Investigation
National Highway Traffic Safety Administration
1200 New Jersey Ave., SE
Washington, DC 20590
Room W46-409

VIA EMAIL
G256422

EA24004-02

Subject: **General Motors LLC's Initial Responses to NHTSA's June 9, 2026, Peer Information Request in Investigation EA24004-02**

Dear Ms. Topka:

This letter contains General Motors LLC's ("**GM**") initial responses (the "**Responses**") to the information requests in your June 9, 2026 letter (the "**Requests**") relating to National Highway Traffic Safety Administration ("**NHTSA**") Engineering Analysis 24-004, which is a NHTSA investigation of inadvertent activation of the automatic emergency braking systems in certain model year 2019 Volkswagen Atlas vehicles. The Responses included in this letter relate to Request 1. GM requested and was granted an extension to supplement this letter with Responses to Requests 2-7 by August 4, 2026. 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 interpreted "Peer Vehicles" to include all model year 2017 - 2021 vehicles that GM defines as a midsize sport utility vehicle or crossover equipped with the subject system, and

excluded all small/compact SUVs and crossovers (e.g., Chevrolet Trax) and full-size SUVs (e.g., Chevrolet Tahoe) from its Responses. GM also interpreted "Subject System"[1] and "Alleged Defect" to relate to the unwanted or inadvertent activation of forward-facing automatic emergency braking ("**AEB**") and front-pedestrian braking ("**FPB**") systems; GM's Responses do not include claims that relate to emergency-braking systems that are rear-facing or to systems that do not perform an emergency-braking function (e.g., adaptive cruise control). GM's document production is contained in the folder titled Cover Letters and Q1.

REQUESTS AND RESPONSES

REQUEST 1:

State, by model and model year, the number of peer vehicles GM has manufactured for sale or lease in the United States. Separately, for each peer 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 system trade name and design version installed as original equipment, including:

   i. Software version(s);

   ii. Firmware version(s);

   iii. Hardware version(s);

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 Excel, or a compatible format, entitled "PRODUCTION DATA."

GM RESPONSE:

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

[1] GM confirmed this interpretation with NHTSA via email on June 15, 2026.

		MODEL YEAR					
MAKE	**MODEL**	**2017**	**2018**	**2019**	**2020**	**2021**	**TOTAL**
Buick	Enclave	n/a	23,556	18,427	17,793	16,767	76,543
Cadillac	XT5	67,102	44,026	51,464	33,880	32,340	228,812
Cadillac	XT6	n/a	n/a	n/a	31,500	21,201	52,701
Chevrolet	Blazer	n/a	n/a	17,575	19,093	72,356	109,024
Chevrolet	Traverse	n/a	34,419	30,295	67,754	59,968	192,436
GMC	Acadia	44,897	25,069	32,106	26,628	60,920	189,620
	TOTAL	**111,999**	**127,070**	**149,867**	**196,648**	**263,552**	**849,136**

TABLE 1-1: PEER VEHICLES

The peer vehicles are equipped with FPB and one of two AEB system configurations: a camera-only configuration or a fusion configuration. Additional information regarding these systems will be provided in GM's supplemental response to Request No. 5. GM has produced the information requested in subparts (a) through (h) in the folder labeled "Q1". Refer to the Microsoft Excel file labeled "PRODUCTION DATA."

In response to subpart (e), the camera-only AEB system consists of the forward camera module ("**FCM**") and the electronic brake control module ("**EBCM**"). The fusion AEB system consists of the FCM, the external object control module ("**EOCM**"), the long-range radar ("**LRR**"), and the EBCM. The FPB system, whether paired with the camera-only or fusion AEB system, relies only on the FCM and EBCM to detect and respond to pedestrians. GM identified component part numbers for approximately 73% of the VINs for which part-number data was traceable. GM will continue efforts to recover the remaining part number data and, if available, will include that information in its final response. GM does not maintain firmware-related part number data, as the firmware is supplied as part of the module. GM does maintain records of the software files loaded onto modules at GM assembly plants. The hardware and software-file part numbers for each module that GM was able to locate during its search are captured in the Microsoft Excel file labeled "PRODUCTION DATA."

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 peer 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, both pending and closed, 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.

GM RESPONSE:

GM's Response to Request 2 will be included in GM's supplemental response.

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 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), email address and telephone number (please use distinct fields for each data type);

d. Vehicle owner or fleet street address, city, state (postal abbreviation), and ZIP code (please use distinct fields for each data type);

e. Vehicle's 17-character VIN;

f. Vehicle's make, model and model year (please use distinct fields for each data type);

g. Vehicle's mileage at time of incident (numeric data type);

h. Incident date (MM/DD/YYYY);

i. Incident details including;

    1. Roadway type;

    2. Roadway features (e.g. overpass, construction plate, etc.)

3. Speed of travel prior to incident onset;

4. Traffic conditions;

5. ADAS feature which commanded braking (e.g. Automatic Emergency Braking, Adaptive Cruise Control, etc.);

j. Whether GM has inspected the vehicle;

1. If inspected, state whether GM confirmed or duplicated the occurrence;

k. The location where the incident occurred;

1. If available, state the location and GPS coordinates;

l. Report or claim date (MM/DD/YYYY);

m. Whether a crash is alleged;

n. Whether property damage is alleged;

o. Number of alleged injuries, if any; and

p. Number of alleged fatalities if any.

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

GM RESPONSE:

GM's Response to Request 3 will be included in GM's supplemental response.

REQUEST 4

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 peer 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), email address and telephone number (please use distinct fields for each data type);

c. Vehicle owner or fleet street address, city, state (postal abbreviation), and ZIP code (please use distinct fields for each data type);

d. 17-character VIN;

e. Repair date (MM/DD/YYYY);

f. Vehicle mileage at time of repair (numeric data type);

g. Repairing dealer's or facility's name, telephone number, city and state or ZIP code (please use distinct fields for each data type);

h. Labor operation number(s);

i. Problem code(s);

j. Diagnostic trouble code(s);

k. Replacement part number(s) and description(s);

l. Concern stated by customer;

m. Cause as stated on the repair order;

n. Correction as stated on the repair order; and

o. Additional comments, if any, by dealer/technician relating to claim and/or repair.

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

GM RESPONSE

GM's Response to Request 4 will be included in GM's supplemental response.

REQUEST 5

State the following information regarding the subject system configuration(s) and integration onto the peer vehicles:

a. Supplier of each system component;

b. Control module(s);

c. Sensor type(s) and model(s);

d. Sensor position(s) and orientation(s); and

e. Sensor position and alignment tolerances.

For subparts "b" and "c" provide the corresponding supplier specifications documents. For subpart "d" provide corresponding engineering drawings.

GM RESPONSE:

GM's Response to Request 5 will be included in GM's supplemental response.

REQUEST 6

Describe how subject system calibration is performed during production, during vehicle operation, and during service.

GM RESPONSE:

GM's Response to Request 6 will be included in GM's supplemental response.

REQUEST 7

Describe in detail the subject system operation, including but not limited to:

a. How the subject system determines that a crash is imminent;

b. Minimum and maximum operating speeds;

c. Control authority over braking deceleration throughout the operational speed envelope;

d. Vehicle and obstacle classification;

e. Response to the presence of other vehicles in adjacent and/or oncoming lanes;

f. Detection of and response to system performance degradation and potential causal factors including but not limited to sensor occlusion, sensor misalignment, internal communication errors, and environmental conditions; and

g. All driver control inputs that cancel or override subject system AEB activation.

GM RESPONSE:

GM's Response to Request 7 will be included in GM's supplemental response.

CONCLUSION

GM's Responses are based upon its investigation to date and reflect its current information and assessment. 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,

[redacted]

Jeff Ronne, Director – Emerging Issue Identification & Product Safety Analytics

cc: Caroline Rogers
ODI_IRresponse@dot.gov

Enclosures

Public copy of GM's document production