



04V-225
(3 pages)

May 10, 2004

Mr. K. N. Weinstein
Associate Administrator for Safety Assurance
National Highway Traffic Safety Administration
400 Seventh Street, S.W., Room 5321
Washington, D.C. 20590

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 NHTSA

Dear Mr. Weinstein:

The following information is submitted pursuant to the requirements of 49 CFR 573.8 as it applies to a determination by General Motors of a noncompliance involving certain 2003 and 2004 model year C/K extended and regular cab pickups and G cargo vans converted to compressed natural gas (CNG) vehicles.

573.8(c)(1): Chevrolet and GMC Divisions of General Motors Corporation

573.8(c)(2)(3)(4): This information is shown on the attached sheet.

573.8(c)(5): General Motors has decided that certain 2003 and 2004 model year C/K extended and regular cab pickups and G cargo vans converted to CNG, fail to conform to Federal Motor Vehicle Safety Standard (FMVSS) 225, "Child Restraint Anchorage Systems." The C/K extended cab vehicles have one seating position, the center rear seat, equipped with child restraint lower anchorages. FMVSS 225 requires child seat lower anchorages in two seating positions for vehicles with three rear seating positions. The C/K standard cab and G cargo van vehicles, which have only front seating positions, have an air-bag-off switch to disable the front passenger air bag and do not have child restraint lower anchorages in the passenger seat. FMVSS 225 requires passenger seat child seat lower anchorages in vehicles with an air-bag-off switch. However, FMVSS 225 does not require vehicles with only front seating positions to have lower anchorage provisions if the vehicle is not equipped with an air-bag-off switch.

573.8(c)(7): Quantum, the second stage manufacturer, converts the subject C/K pickup and G cargo van vehicles to CNG (RPOs KL8 and KL9) fuel usage prior to delivery to GM dealers. In early February 2004, while GM Canada Engineering reviewed some wording changes to the Quantum Incomplete Vehicle Document (IVD) and Incomplete Statement Label (ISL), they noted that the IVD and ISL did not clearly state that the 8,500 GVW incomplete vehicles conform to FMVSS 225. General Motors Product Investigations assigned an investigator to the issue on February 24, 2004 after being advised of a potential noncompliance by GM Canada Limited.

Upon further investigation, it was noted that the same label is applied to both the 9,200 GVW and 8,500 GVW incomplete vehicles. Since the 9,200 GVW vehicles are not required to meet FMVSS 225, reference to FMVSS 225 is omitted from its statement label. GM Canada Engineering then investigated the compliance of the 8,500 GVW complete vehicles to FMVSS 225. GM Canada Engineering and GM Canada Validation discovered in this investigation that when the 9,200 GVW base vehicle was de-rated to 8,500 GVW, compliance to FMVSS 225 was not reviewed.

During March 2004 the Product Investigator led the engineering team in an investigation of each CNG configuration and option, and the additional standards that they were required to meet. The team developed production and field solutions for each configuration and assembled documentation for the presentation to the FPE director.

On April 8, 2004, the condition was reported to the FPE Director. The GMNA Senior Management Committee reviewed the issue and on May 3, 2004 the Field Action Decision Committee decided to conduct a noncompliance field action.

Product Investigations

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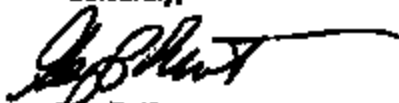
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573.6(e)(8): To bring the C/K standard cab and G cargo van vehicles into compliance, GM will inject epoxy into the air-bag-off switch to prevent air bag activation, relocate the switch behind the instrument panel and then install a cover over the resulting opening. The sun visor label and owner's manual will also be changed. The correction for the C/K extended cab vehicles would consist of changing the front passenger seat to a seat that has child restraint lower anchorages.

Pursuant to 577.11(e), GM does not believe notification about reimbursement is required for this recall. The involved vehicles are current models and are covered by the new vehicle warranty.

573.6(c)(8): GM will provide draft and final copies of the bulletin and owner letter and when GM plans to begin this recall when available.

Sincerely,



Gay P. Kent
Director

Product Investigations

2145 - 04038
Attachments

**VEHICLES POTENTIALLY AFFECTED BY MAKE, MODEL, AND MODEL YEAR
PLUS INCLUSIVE DATES OF MANUFACTURE**

<u>MAKE</u>	<u>MODEL SERIES</u>	<u>MODEL YEAR</u>	<u>NUMBER INVOLVED</u>	<u>INCLUSIVE MANUFACTURING DATES (FROM) (TO)</u>		<u>DESCRIPTIVE INFO. TO PROPERLY IDENT. VEH.</u>	<u>EST. NO. W/CONDITION</u>
Chevrolet	G Van	2003	104	08/02	05/03	Express CNG	100%
Chevrolet	CK	2003	447	08/02	06/03	Silverado CNG	"
Chevrolet	CK	2004	70	08/03	03/04	Silverado CNG	"
GMC	G Van	2003	33	08/02	05/03	Savana CNG	100%
GMC	CK	2003	77	08/02	06/03	Sierra CNG	"
GMC	CK	2004	5	08/03	03/04	Sierra CNG	"
GM Total:			738				