



October 27, 2004

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

04V-528
(3 pages)

Dear Mr. Weinstein:

The following information is submitted pursuant to the requirements of 49 CFR 573.6 as it applies to a determination by General Motors of a noncompliance involving certain 2003 Chevrolet Malibu; Pontiac Grand Am; and Oldsmobile Alero model vehicles equipped with a six-cylinder engine (RPO LA1 or LG8).

573.6(c)(1): Chevrolet, Pontiac and Oldsmobile Division of General Motors Corporation

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

573.6(c)(5): General Motors has decided that certain 2003 model year Chevrolet Malibu; Pontiac Grand Am; and Oldsmobile Alero vehicles fail to conform to Federal Motor Vehicle Safety Standard 124, Accelerator Control Systems. In hot ambient conditions, the accelerator pedal arm may stick at the attachment to the bracket and not return to the engine idle position when the operator removes the actuating force from the accelerator pedal. The suspect vehicles were built November 2002, December 2002, January 2003, April 2003, and May 2003.

573.6(c)(6): The test results considered in making this determination included:

On August 30, 2004, a 2003 Malibu LS (odometer reading 16,814 miles) that was reported to have a sticking accelerator pedal was inspected at the GM Tech Center. With the accelerator cable detached from the pedal arm, the accelerator pedal did not fall freely to the floor when dropped from a higher position in the swing arc. After the pedal assembly was removed from the vehicle, the freefall characteristic was checked with the assembly placed on a workbench. Again, the accelerator pedal did not fall freely when dropped from a higher position in the swing arc. A new tested pedal assembly was obtained. The freefall characteristic was checked before and after the pedal assembly was installed, and the pedal fell freely both before and after installation. The pedal was checked for freedom of movement after the accelerator cable was assembled to the pedal arm, and the pedal operated as expected.

On the same date, a similar check was made on two 2003 Malibu vehicles in Connecticut that were reported to have sticking accelerator pedals. The results were the same. Therefore, the cause was attributed to a condition of the brake pedal and accelerator pedal assembly, and not to the throttle or throttle cable assemblies.

Between August 31, 2004 and September 10, 2004, a heat-aggravated Red X study was completed using 10 parts returned from the field that exhibited the condition, and 10 parts from Lansing Car Assembly (LCA) that were produced while controlling the outside length of the rivet and the alignment of the rivet holes. Five conclusions were made from the results of the tests:

1. Heat is a contributor to the condition.
2. The length of the rivet after the riveting operation is a contributor to the condition.
3. The pedal arm material increases in width approximately 0.2 mm when heated to 140 degrees F.
4. The shortest outside rivet length for a properly performing accelerator pedal assembly is 33.75 mm.
5. In some cases, the accelerator pedal may not fall freely at temperatures above 93 degrees F.

Other information that was considered included field reports and warranty data analyses:

In October 2003, a 24-hour Concerns Detection Process (CDP) case reported a "sticking" accelerator pedal. Analysis of a production part indicated that the part dimensions met the print specifications. Review of Dynamic Vehicle Test (DVT) data indicated that vehicles shipped to commerce passed the "return to idle" DVT test. On October 10, 2003, a Problem Resolution Tracking System (PRTS) issue was written on the CDP case and assigned to Supplier Quality Engineering. At the time, there were no unusual trends in the warranty data, and the assembly on which the condition was reported was not available.

In May 2004, the GM Brand Quality Manager (BQM) reviewed warranty reports from January 2004 through April 2004. The BQM reported that "no claims for replacing the accelerator bracket" were made during that time.

On July 19, 2004, the BQM discovered that the cumulative IPTV for replacing accelerator pedal assemblies was higher for the 2003 model year than it had been for previous model years and the 2004 model year.

On August 23, 2004, the preliminary Statistical Engineering Summary Report from a Red X study initiated in October 2003 ("determine the cause of high accelerator pedal movement effort") was reviewed by an investigation team created to determine the cause of the higher cumulative IPTV for replacing accelerator pedal assemblies. The report stated, "the data collected indicated a spike interaction between the Red X, the hole misalignment, and the Pink X, the rivet length..." Also, a review of the warranty repair cases showed that most of the repairs for the sticking condition occurred between May 2004 and September 2004, suggesting that the condition was noticeable during the hottest months of the year and may be heat sensitive.

A review of IPTV by month of build warranty data for labor code J5350 (accelerator pedal assembly replace) showed that warranty is much greater for build months November 2002 through January 2003 and April 2003 through May 2003 than for other build months of the same vehicles. The IPTV by month of build for the months after May 2003 are near zero. The data illustrated that a special cause exists for the condition, and the condition was created during a specific build period. Investigation to identify that cause is continuing.

On October 13, 2004 the Product Investigations Engineer presented the condition to the FPE Director.

The GMNA Senior Management Committee recommended a field action and on October 26, 2004, the FADC decided to conduct a noncompliance recall.

573.6(c)(5): Dealers are to inspect the accelerator pedal arm for free fall and replace the accelerator and brake pedal assembly with a new assembly, if necessary.

Pursuant to 577.11(e), GM will provide reimbursement to owners for repairs completed on or before ten days after the owner mailing is completed, according to the plan submitted on January 15, 2003.

573.6(c)(9): GM will provide a draft copy of the bulletin and owner letter along with mailing dates when available.

Shoreline

Gay P. Kent
Director
Product Investigations

573.8(c)(2),(3),(4)

**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</u> <u>(FROM) (TO)</u>		<u>DESCRIPTIVE INFO. TO PROPERLY IDENT. VEH.</u>	<u>EST. NO. W/CONDITION</u>
Chevrolet	N	2003	52,365	11/2002 04/2003	01/2003 05/2003	Malibu	*Unknown
Pontiac	N	2003	29,578	11/2002 04/2003	01/2003 06/2003	Grand Am	
Oldsmobile	N	2003	10,922	11/2002 04/2003	01/2003 05/2003	Alero	
GM Total:			92,863				

* All affected vehicles will be corrected.

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