



April 22, 2005

Mr. Ronald Medford
Senior Associate Administrator, Vehicle Safety
National Highway Traffic Safety Administration
400 Seventh Street, S.W., Room 5321
Washington, D.C. 20590

05V-163
(3 pages)

Dear Mr. Medford:

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 safety defect involving certain 2003-2005 model year Chevrolet Silverado Crew Cab, Suburban, Tahoe, Avalanche; Cadillac Escalade, Escalade ESV, Escalade EXT; GMC Sierra Crew Cab, Yukon XL, Yukon; and Hummer H2 model trucks.

573.6(c)(1): Chevrolet, Cadillac, GMC and Hummer Divisions 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 a defect, which relates to motor vehicle safety, exists in certain 2003-2005 model year Chevrolet Silverado Crew Cab, Suburban, Tahoe, Avalanche; Cadillac Escalade, Escalade ESV, Escalade EXT; GMC Sierra Crew Cab, Yukon XL, Yukon; and Hummer H2 model trucks. The 2nd row center occupant seat belt routing may make it difficult to position the lap portion of the safety belt low around the hips of occupants, especially smaller occupants, seated in this position. Appropriate use of a child seat or booster seat, as recommended for small children, does improve the fit condition for this user group.

In addition to instructions on proper infant and young child restraint (with child seats or boosters), special verbiage for restraining older children is included in the owner's manual. Also, the suggested seat belt fit/routing for adults, irrespective of seating position, is described in the owner's manual text.

A lap portion of the seat belt routing that is not low and snug on the hips can allow unfavorable occupant kinematics in the event of an accident, especially a frontal collision. Moreover, the higher routing allows the lap belt to ride up on an occupant's abdomen instead of fitting low around their hipbones, and therefore, can expose them to more risk of abdominal and internal organ injury.

573.6(c)(6): Initial applications of the GMT800 program had 2-point (lap belt only with a relatively "low" seat loop surrounding the belt webbing) configuration in the 2nd row center position.

For the 2003 model year, a 3-point (lap and shoulder) seat belt configuration in the 2nd row center seating position was designed and validated for the GMT800 utilities and crew cab pick-ups. This system, as developed, did not include a loop on the seat surrounding the lap seat belt webbing. Accordingly, all 2003 model year 3-point development sled testing was performed without a loop on the seat back, and the occupant performance was judged to be acceptable because belt routing was not affected by the presence of a loop.

Product Investigations

In December 2002, (once regular production 2003 vehicles were available) the Seat Belt Total Integration Engineer (TIE), along with Vehicle Safety Crashworthiness Integration (VSCI) noticed the addition of the seat loop. It was jointly decided to leverage the in-progress 2004 model year H2 2nd row center 3-point developmental sled testing to evaluate the design. In September 2004, a Field Performance Assessment Engineer (FPAE) in the FPA group also noticed the lap seat belt routing for the 2nd row center seating position and how it was affected by the presence of the loop on the seat surrounding the belt webbing. In September 2004, a review of the sled testing that had been conducted for this seating position, and a static evaluation of the 6-yr-old Hybrid III Anthropomorphic Test Dummy (ATD) in this seating position was completed. Subsequently, a FPAE and the Internal Investigations group within Product Investigations was assigned to the issue in early October, and an ad-hoc cross-functional working group met twice to discuss the issue and begin the FPE investigation.

The ensuing investigation involved careful analysis of the effects of the condition on occupant kinematics, including review of test data in accordance with GM assessment criteria.

GM is not aware of a single incident in which this condition has been alleged to have caused or contributed to injury to a vehicle occupant. Statistical analysis indicates a probability of very low exposure rates. Nonetheless, to assure the capability of the restraint system to provide optimal performance and consistent with its paramount commitment to promoting child safety, GM believes that recalling these vehicles to provide improved routing is an important precautionary measure.

The issue was presented to the FPE Director on April 4, 2005. The issue was presented to the GMNA Senior Management Committee (SMC) and on April 22, 2005 the Field Action Decision Committee decided to conduct a safety recall.

573.6(c)(8): Dealers are to cut open the guide loop, remove a portion of the loop and then the remaining two sides should be folded over and secured with a retainer.

Pursuant to 577.11(e), GM will not provide reimbursement to owners, according to the plan submitted on January 14, 2005. Owners would not know that this condition exists before receiving the recall notice.

573.6(c)(9): GM will submit a draft copy of the dealer bulletin and owner letter and scheduled mailing dates when available.

Sincerely,



Gay P. Kent
Director

Product Investigations

573.6(c)(2),(3),(4)

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

MAKE	MODEL SERIES	MODEL YEAR	NUMBER INVOLVED	INCLUSIVE MANUFACTURING DATES		DESCRIPTIVE INFO. TO PROPERLY IDENT. VEH.	EST. NO. W/CONDITION
				(FROM)	(TO)		
Chevrolet	GMT 800	2003	464,216	04/03/02	07/31/03	Silverado, Suburban, Tahoe, Avalanche	All
Chevrolet	GMT 800	2004	439,388	04/08/03	08/04/04	Silverado, Suburban, Tahoe, Avalanche	"
Chevrolet	GMT 800	2005	93,649	02/24/04	11/02/04	Silverado, Suburban, Tahoe, Avalanche	"
Cadillac	GMT 800	2003	30,640	04/03/02	07/31/03	Escalade	"
Cadillac	GMT 800	2004	19,025	04/08/03	08/04/04	Escalade	"
Cadillac	GMT 800	2005	5,060	02/24/04	11/02/04	Escalade	"
GMC	GMT 800	2003	125,152	04/03/02	07/31/03	Sierra/Yukon	"
GMC	GMT 800	2004	118,188	04/08/03	08/04/04	Sierra/Yukon	"
GMC	GMT 800	2005	33,191	02/24/04	11/02/04	Sierra/Yukon	"
Hummer	H2	2004	21,530	04/08/03	08/04/04	H2	"
Hummer	H2	2005	<u>9,785</u>	02/24/04	11/02/04	H2	"
GM Total:			1,359,824				

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