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Product Investigations and
Safety Affairs
Gary R. Greib
Manager

GL07-002-001

07E-015

February 21, 2007

Daniel Smith
Associate Administrator for Enforcement
National Highway and Safety Administration
400 Seventh Street, SW.
Washington, DC 20590
Fax Number: 202-366-8065

In RE: 49 CFR 573 Notice

Dear Mr. Smith:

On February 14, 2007, Delphi Corporation determined that a defect that relates to motor vehicle safety exists in certain items of motor vehicle equipment described herein, and is furnishing notification to the National Highway Traffic Safety Administration in accordance with 49 CFR 573 Defect and Noncompliance Reports.

Per section 573.6(c), the required information is listed below.

- Delphi Corporation is the manufacturer of the items of motor vehicle equipment described herein.
- The parts in question consist of 43 service and aftermarket fuel pump modules / Module Reservoir Assemblies (MRAs) that were sold for use in the following 1996 – 1998 GM vehicles: Pontiac Grand AM, Pontiac Sunfire, Chevrolet Cavalier, Oldsmobile Achieva, and Buick Skylark. The Delphi part numbers for the suspect MRAs are FG0170-11B1, FG0049-11B1, MU55 and MU269.

Delphi's basis for determining the nonconforming MRA population is as follows:

- a. The root cause of the nonconformance is a sub-supplier (Dana Corporation)
 assembly error in the MRA tube bundles. The nonconforming MRA tube bundles had
 the vent and fuel return tubes reversed.
- b. The nonconforming MRA tube bundles were produced by Dana on October 18, 2006.
- c. Discussions between Delphi and Dana Quality Departments led to the discovery that the nonconforming tube bundles were built by an inadequately trained Dana assembly operator on October 18, 2006.
- d. Delphi's inspection of approximately 1500 MRAs in Delphi and dealer/distributor stock confirmed that only tube bundles built by Dana on October 18, 2006 were potentially nonconforming.
- e. A total of 162 MRA tube bundles were built by Dana on October 18, 2006, and of that quantity, Delphi has contained a total of 119.

As mentioned above, Dana Corporation is the manufacturer of the MRA tube bundle subassembly. Dana's Sales and Manufacturing group addresses and phone numbers are listed below.

Dana Rochester Hills (Sales) 2910 Waterview Drive Rochester Hills, MI 48309 Letter to Daniel Smith February 21, 2007 Page 2 of 3

Eric Haiss – Sales and Engineering Manager 248-293-7304 office

Dana San Luis Potosi (Manufacturing site) Av. C. F. E. No 800 Circuito Interior 105 Parque Industrial Millennium Zona Industrial Del Potosi San Luis Potosi, S. L. P. Mexico

Francisco Chavez – Plant Manager 52-444-834-6539

- Delphi estimates that of the 162 suspect parts built, potentially 43 suspect MRAs are still in the field.
- 4. Delphi estimates that approximately 75% (32) of the suspect MRAs remaining in the field have the nonconformance. This estimate is based on the nonconformance ratio found in the 119 previously contained suspect MRAs.
- 5. The nonconformance consists of the MRAs vent and fuel return tubes being reversed. Delphi has determined, via analysis and testing, the following two potential field scenarios can result from usage of the nonconforming MRAs:
 - a. The vehicle will not run correctly (idle rough and/or stall) due an overly rich fuel blend,
 - b. The vehicle's evaporative emission carbon canister may leak fuel.
- 6. The chronology of significant events follow:
 - January 16, 2007 Delphi Product and Service Solutions (DPSS) group was informed of an issue in the aftermarket channel. Request was made to return suspect parts.
 - January 19, 2007 Delphi Flint manufacturing site was sent an email from a Service customer notifying them of a nonconforming MRA.
 - January 22, 2007 Delphi Flint Quality group reviewed the email and started investigation.
 - January 26, 2007 DPSS group discovers the MRA nonconformance from 2 returned field parts – from January 16th report.
 - January 29, 2007 Field wire sent by GM SPO to service channel (dealers) to return suspect product.
 - February 5, 2007 The DPSS Quality Manager issues a containment letter to the DPSS Sales Staff to contact distributors to contain suspect parts for Delphi inspection.
 - February 9, 2007 DPSS completed phone call follow-up with the two aftermarket field reports. Delphi Flint manufacturing site completes testing on 1996 Grand AM vehicle with a nonconforming MRA.
 - February 14, 2007 Delphi conducts Senior Management Review for disposition on whether the MRA nonconformance is a motor vehicle safety related defect. A decision is made that a safety defect exists and direction is given to notify NHTSA promptly.
- 7. Not applicable.

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- 8. Delphi's remedy is to replace the nonconforming MRAs with conforming MRAs. As noted in the chronology, Delphi has already started the containment and sorting of nonconforming MRAs at dealers and distributors.
- 9. Not applicable.
- 10. Delphi will provide copies of distributor/dealer notifications when available.

Please address any questions or communications regarding this matter to the undersigned.

Sincerely,

Gary R. Greib

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Manager, Product Investigations and Safety Affairs

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cc: James Derian, Esq.

Eric Haiss, Dana Corporation