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DEFECTS INVESTIGATION RECALL MGMT DIV.

October 3, 2007

Mr. Daniel C. Smith Associate Administrator for Enforcement National Highway Traffic Safety Administration Recall Management Division (NVS-215) 1200 New Jersey Avenue, SE - Room W45-306 Washington, D.C. 20590

07V-468 (2 pages)

Dear Mr. Smith:

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 2007 model year Cadillac CTS vehicles.

573.6(c)(1): Cadillac Brand 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 2007 model year Cadillac CTS vehicles equipped with a sunroof (RPO CF5) fail to conform to Federal Motor Vehicle Safety Standard 118, Power Operated Window Systems. Under the Standard, the sunroof may only be closed when the ignition is on, or after the ignition is turned off, but before either of the front doors are opened. The subject vehicles may exhibit a condition where the sunroof can be closed after the ignition is turned off and the doors are opened.

573.6(c)(7): GM's determination is based on:

On May 11, 2007, the condition was first observed in the assembly plant and an investigation began. Based on testing conducted at the assembly plant, it was determined that there was a 28% chance that the condition could occur on a specific vehicle. If the vehicle battery were disconnected and reconnected during service, the chance of the condition occurring on that vehicle would again be 28%, regardless of the previous condition of the vehicle. GM also learned that the condition was caused by an unauthorized supplier software change that affected sunroof modules installed in vehicles beginning on January 15, 2007.

The issue was presented to the Field Performance Evaluation Review Committee (FPERC) and on September 27, 2007, the Executive Field Action Decision Committee (EFADC) decided to conduct a noncompliance recall.

573.6(c)(8): Dealers are to install a wire harness.

Pursuant to 577.11(e), GM does not plan to provide notice about reimbursement to owners because all involved vehicles are covered under the new vehicle warranty.

573.6(c)(9): General Motors will provide the dealer bulletin and owner letter along with mail dates when available.

Director

**Product Investigations** 

N070149 Attachment



N070149 - 573 Letter.doc



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

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

<u>MAKE</u>	MODEL SERIES	MODEL YEAR	NUMBER INVOLVED		JSIVE JRING DATES (TO)	DESCRIPTIVE INFO. TO PROPERLY IDENT. VEH.	EST. NO. W/CONDITION
Cadillac	D	2007	9,648	05/2006	06/2007	СТЅ	*
	GM Total:		9,648				

<sup>\*</sup> All involved vehicles will be corrected as necessary.

N070149