



GENERAL MOTORS CORPORATION
Vehicle Structure & Safety Integration

January 30, 2008

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

08V-046
(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 2006-08 model year Chevrolet HHR vehicles.

573.6(c)(1): Chevrolet 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 2006-08 model year Chevrolet HHR vehicles not equipped with optional Roof Rail Air Bags, fail to conform to Federal Motor Vehicle Safety Standard 201, "Occupant Protection in Interior Impact." In tests, one of the upper interior occupant protection test points exceeded the Standard's requirement.

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

On December 17, 2007, a NHTSA contractor tested a 2007 Chevrolet HHR without Roof Rail Air Bags and without a sunroof. The result was above the FMVSS 201 requirement of 1,000.

On January 8 - 9, 2008, GM retested the Chevrolet HHR without Roof Rail Air Bags and without a sunroof at the AP1 impact location on the left and right sides. The HIC(d)s were 1,011 and 1,026 respectively. GM also conducted 4 FMVSS 201 tests on the 2007 Chevrolet HHR without Roof Rail Air Bags and with the sunroof option. The results were 921, 883, 891, and 1,117

The issue was presented to the Field Performance Evaluation Review Committee and on January 28, 2008, the Executive Field Action Decision Committee decided to conduct a noncompliance recall.

573.6(c)(8): Dealers are to install an energy-absorbing plastic piece to the headliner trim.

Pursuant to 577.11(e), GM does not plan to provide notice about reimbursement to owners because this remedy was not previously known to or available from dealers or other service providers.

573.6(c)(9): GM will provide copies of the dealer bulletin and owner letter when available. Based on expected parts availability, GM anticipates sending the dealer bulletin and owner letters in late March 2008.

Sincerely,

Gay P. Kent

Director

Product Investigations

N080016
Attachment

Product Investigations

Mail Code: 480-210-G11 • 30001 Van Dyke • Warren, MI 48090-9020
N080016 - 573 Letter

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DEFECTS INVESTIGATION
RECALL MGMT DIV.

573.6(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 (FROM) (TO)</u>		<u>DESCRIPTIVE INFO. TO PROPERLY IDENT. VEH.</u>	<u>EST. NO. W/CONDITION</u>
Chevrolet	A Truck	2006	85,409	04/2005	06/2006	HHR	*
Chevrolet	A Truck	2007	80,779	05/2006	06/2007	HHR	"
Chevrolet	A Truck	2008	15,328	05/2007	08/2007	HHR	"
GM Total:			181,516				

* All involved vehicles will be inspected and corrected as necessary.

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