



December 18, 2009

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, DC 20590

Dear Mr. Smith:

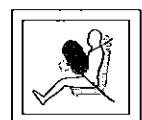
The following information is submitted pursuant to the requirements of 49 CFR 573.6 as it applies to a determination by General Motors of a safety defect involving certain 2005-2007 model year Chevrolet Corvette and 2006-2007 model year Chevrolet Corvette Z06 vehicles.

573.6(c)(1): Chevrolet Brand of General Motors LLC

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 2005-2007 model year Chevrolet Corvette vehicles equipped with a removable roof and 2006-2007 model year Chevrolet Corvette Z06 vehicles. Some of these vehicles have a condition in which the adhesive between the roof panel and the frame may separate. If there is a partial separation, the occupant may notice one or more symptoms, such as a snapping noise when driving over bumps, wind noise, poor roof panel fit, roof panel movement/bounce when a door or hatch is closed, or a water leak in the headliner. If there is a complete separation, the roof panel may detach from the vehicle. If this were to occur while the vehicle was being driven, it could strike a following vehicle and cause injury and/or property damage.

573.6(c)(6): In March 2009, GM Japan contacted Product Investigations regarding an inquiry by the Japan Ministry of Land Infrastructure and Transport (JMLIT) regarding roof panel separation on Corvettes that had the adhesive foam applied as part of a field action in Japan (comparable to Customer Satisfaction Program 05112 or Safety Recall 06041). At the time, all repairs were completed by one dealer and separations were believed to be the result of an incorrect repair procedure. The JMLIT inquiry prompted GM to analyze U.S. warranty data to look at vehicles that had any warranty claims related to the roof after field action 05112 or 06041 was completed. The analysis concentrated on those that first had the adhesive foam added and then had a roof replacement. If the verbatim indicated the complete separation of the roof from the magnesium frame, the complete warranty history of the vehicle was evaluated.



Analysis of verbatims from the latest warranty pull, December 3, 2009, revealed there were 108 claims that documented complete separation after the foam was added. GM also reviewed warranty data on additional vehicles not included in the previous recalls that had the adhesive foam added as part of the production build. These vehicles are also included in this field action.

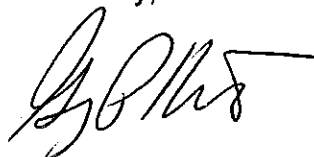
The issue was presented to the Field Performance Evaluation Review Committee and on December 17, 2009, the Executive Field Action Decision Committee decided to conduct a safety recall.

573.6(c)(8): Dealers are to install a new design roof panel.

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 22, 2009.

573.6(c)(10): GM will provide the dealer bulletin and owner letter when available. GM anticipates that the dealer bulletin and owner letters will be sent in January 2010.

Sincerely,

A handwritten signature in black ink, appearing to read "G. P. Kent", with a long horizontal stroke extending to the right.

Gay P. Kent,
Director, Product Investigations
and Safety Regulations

N090230
Attachment

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	Y-Car	2005	11,409	03/2004	09/2005	Corvette *
Chevrolet	Y-Car	2006	6,212	03/2005	06/2006	Corvette "
Chevrolet	Y-Car	2007	1,375	03/2006	08/2006	Corvette "
Chevrolet	Y-Car	2006	2,682	04/2005	06/2006	Corvette Z06 "
Chevrolet	Y-Car	2007	412	02/2006	08/2006	Corvette Z06 "
GM Total:			22,090			

* All involved vehicles will be corrected as necessary.

573.6(c)(2)(iv): The component part that will be replaced to remedy the defect is the roof panel supplied by Lexa Mar Corporation.

Lexa Mar Corporation
 100 LexaMar Drive
 Boyne City, MI 49712
 231-582-3163

The roof panel was assembled in Michigan, USA.