

August 12, 2010

10V-375
(3 Pages)

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 to conduct a safety related recall of certain 2009-2010 model year Buick Enclave, Chevrolet Traverse, GMC Acadia and Saturn OUTLOOK vehicles.

573.6(c)(1): Buick, Chevrolet, GMC and Saturn Brands 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 2009-2010 model year Buick Enclave, Chevrolet Traverse, GMC Acadia, and Saturn OUTLOOK vehicles. These vehicles may have a condition where the second row seat side trim shield restricts the upward rotation of the safety belt buckle when the seat back is returned to a seating position after being folded flat. If the buckle contacts the seat frame, additional effort is required to return the seat to a seating position. If sufficient force is applied, the buckle cover could be pushed down the strap, exposing and partially depressing the red release button. As a result, the release button will not travel as much as designed when depressed and will appear to be jammed. The buckle cover may have visible damage which may only be cosmetic, but in some cases, the buckle may not latch/unlatch, or may appear to latch when the latch mechanism is not fully engaged.

573.6(c)(6): In January 2010, a Product Engineering Investigator was assigned this issue to understand a reported case where the buckle latching mechanism wasn't fully engaged on a rear seat belt buckle. The root cause of the issue wasn't understood at that time.

From January through July 2010, the Product Investigator worked with product engineers to understand the circumstances needed for the condition to occur, and the likelihood of the condition occurring. This included analysis of warranty data and warranty return parts, and a review of TREAD data to determine if there were any other field reports.

In late February 2010, a survey was initiated on a fleet of company owned GM vehicles.

By mid March 2010, 357 drivers had responded "no" or "don't know" to the question, "Do your second row seat belt buckles show any signs of damage?" There were only two



responses indicating that damage was observed. Both vehicles were reviewed and the damage was found to be cosmetic and the buckles functioned properly.

A Red X study conducted in late April 2010 indicated that variation in the build of the seat side shield was the most significant contributor for the potential of the condition to occur. A secondary factor was a 10% reduction in the buckle return spring torque due to a supplier change on May 1, 2009. The spring specification was unchanged, however the supplier change resulted in a performance shift within the specification. This reduction makes it more likely that a buckle that has frictional contact with the side shield will not be able to overcome that friction and may then be contacted by the seat cushion structure when the seat is being restored upright. If this interference is not recognized by the customer when they are restoring the seat, damage could occur to the buckle.

Warranty return parts and warranty data analysis indicates that in the vast majority of cases, the damage was only cosmetic, and the buckle continued to function properly. In some instances the damage could be so significant that the buckle latch cannot engage at all when the seat belt latch plate is inserted. In a small number of cases, the buckle damage will be visible, and the seat belt buckle may appear to latch properly, but the buckle latching mechanism would only be partially engaged.

In July 2010, GM engineering was only aware of three confirmed cases where the seat belt buckle was damaged to the point where the latching mechanism would not fully engage. GM engineering is not aware of any crashes where there are reports of injuries related to the condition.

The issue was presented to the Field Performance Evaluation Review Committee and on August 5, 2010, the Executive Field Action Decision Committee decided to conduct a safety recall.

573.6(c)(8): Dealers/retailers are to modify the second row seat side trim shields and inspect the safety belt buckle. If a safety belt buckle is damaged, dealers are to replace it.

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)(10): GM will provide the dealer bulletin and owner letter under separate cover. It is anticipated that the dealer bulletin will be sent on August 24, 2010 and mailing of the owner letters on August 31, 2010.

Sincerely,



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

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	RV	2009	15,267	08/2008	07/2009	Traverse	*
Chevrolet	RV	2010	77,336	05/2009	05/2010	Traverse	"
Buick	RV	2009	4,958	07/2008	06/2009	Enclave	"
Buick	RV	2010	45,566	06/2009	05/2010	Enclave	"
GMC	RV	2009	3,585	05/2008	06/2009	Acadia	"
GMC	RV	2010	54,676	06/2009	05/2010	Acadia	"
Saturn	RV	2009	2,196	07/2008	06/2009	Outlook	"
Saturn	RV	2010	3,626	06/2009	03/2010	Outlook	"

GM Total: 207,210

* All involved vehicles will be corrected as necessary.

573.6(c)(2)(iv): The seats were manufactured by JCI in the United States.

JCI
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