

September 13, 2010

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

10V-414
(3 Pages)

Dear Mr. Smith:

The following information is submitted pursuant to the requirements of 49 CFR 573.7 as it applies to a determination by General Motors of a noncompliance involving certain 2009 and 2010 model year Cadillac CTS All Wheel Drive and CTS-V vehicles.

573.6(c)(1): Cadillac 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 certain 2009 and 2010 model year Cadillac CTS All Wheel Drive and CTS-V vehicles fail to conform to Federal Motor Vehicle Safety Standard 208, Occupant Crash Protection – 5th Percentile Unbelted Passenger Femur Load. In the event of a vehicle crash, if a small occupant is in the front passenger seat and is not wearing a safety belt, the risk of injury to the femur is higher than permitted under the federal law. To avoid this risk, the front seat passenger should always wear the available safety belt properly. Everyone should properly wear safety belts at all times when riding in a motor vehicle.

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

On April 27, 2010, MGA, a contractor for the NHTSA, conducted a 25 mph Frontal Barrier Test with an unbelted 5th percentile Anthropomorphic Test Devices (ATD), on a 2010MY Cadillac CTS All Wheel Drive vehicle. The passenger ATD right femur exhibited IARV (Injury Assessment Reference Value) 1% above the FMVSS 208 requirement of 6805 N. (The force transmitted axially through each femur shall not exceed 6805 N [1530 lb].) Due to discrepancies with the test setup and vehicle noted by GM, the NHTSA decided to retest.

On August 25, 2010, MGA conducted the same test with a similar 2010 MY vehicle. The right femur load on the unbelted 5th percentile ATD exceeded the FMVSS 208 limit by 3%.



Due to the results of these tests, some of the subject vehicles may not comply with FMVSS 208.

The issue was presented to the Field Performance Evaluation Review Committee and on September 3, 2010, the Executive Field Action Decision Committee decided to conduct a noncompliance recall.

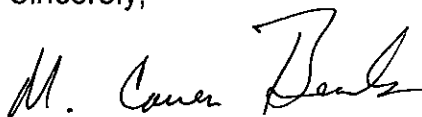
573.6(c)(8): GM is developing the remedy and will submit that as soon as it is available.

GM will provide the mail dates for the dealer bulletin and owner letter when available.

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 when available.

Sincerely,

A handwritten signature in black ink, appearing to read "M. Carmen Benavides". The signature is written in a cursive style with a large, stylized initial "M".

M. Carmen Benavides
Director, Product Investigations
and Safety Regulations

N100292
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>
Cadillac	D	2009	4,837	03/2009 06/2009	CTS / CTS-V	*
Cadillac	D	2010	15,387	03/2009 05/2010	CTS / CTS-V	"
GM Total:			20,224			

* All involved vehicles will be corrected as necessary.

573.6(c)(2)(iv): TBD

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