November 4, 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, 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 for certain 2010 and 2011 model year Buick Lucerne vehicles equipped with a V8 engine, and Cadillac DTS vehicles.

## 573.6(c)(1): Buick and Cadillac 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 2010 and 2011 model year Buick Lucerne vehicles equipped with a V8 engine and Cadillac DTS vehicles. Some of these vehicles may have been built where the starter or alternator cable is in contact with the power steering return line. If either the starter or alternator cable is contacting the power steering return line, the cable could wear through the line, cause a power steering fluid leak and a loss of power steering. The contact may also wear the cable protective wrap, conduit, and wire insulation so there is metal to metal contact. This could result in battery drain. If arcing occurs due to engine vibration and roll, it may burn a hole in the return line and allow power steering fluid to leak and potentially ignite, resulting in a possible engine compartment fire.
573.6(c)(6): On August 24, 2010, a product investigation engineer was assigned to analyze two reported fires in the field related to a power steering line leak after arcing by the starter or alternator cable. The first incident was reported on August 23, 2010 and the second on August 24, 2010.
Also on August 24, 2010, the Hamtramck Plant conducted a yard hold on complete vehicles and the line worked backward to ensure that the starter and alternator cables were not in contact with the power steering return line.
After receiving the report for the two fires, warranty and field reports were searched to determine if there were additional incidents. Reviews were held with the Brand Quality Manager and Engineering to understand the root cause and history.

The investigation discovered that on February 1, 2010 the location of the operation for installing the starter and alternator cables to the Underhood Bussed Electrical Center was moved. The move was made due to the assembly line rate being reduced. All reports related to the condition occurred after that change was made.
On October 11, 2010, warranty data was analyzed to determine if there were additional reports of the condition.
The issue was presented to the Field Performance Evaluation Review Committee and on October 29, 2010, the Executive Field Action Decision Committee decided to conduct a safety recall.
573.6(c)(8): Dealers are to secure and, if necessary, reroute the lines to prevent contact.

GM plans to send the dealer bulletin on November 4, 2010 and the owner letters on November 19, 2010.

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,

M. Carmen Benavides Director, Product Investigations and Safety Regulations
N100351
Attachment

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


