November 18, 2010

Mr. Claude Harris
Acting 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

## Dear Mr. Harris:

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 2004-2011 model year Chevrolet Colorado, GMC Canyon and 2006 model year Isuzu i280 \& i-350 and 2007-2008 model year Isuzu i-290 \& i-370 vehicles.
573.6(c)(1): Chevrolet and GMC Brands of General Motors Company and Isuzu Motors America, 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 2004-2011 model year Chevrolet Colorado, GMC Canyon and 2006 model year Isuzu i-280 \& i-350 and 2007-2008 model year Isuzu i-290 \& i-370 regular cab vehicles and extended cab vehicles without a rear seat, and equipped with a front $60 / 40$ split bench seat fail to conform to Federal Motor Vehicle Safety Standard (FMVSS) 225, Child Restraint Anchorage Systems. The child restraint top tether anchor for the front center seat position in these vehicles is not accessible as required by the Standard. Without the top tether anchor, the child restraint may not be properly secured. FMVSS 225 also requires that the Owner Manual includes a step-by-step procedure for attaching a child restraint top tether to a vehicle top tether anchor.
573.6(c)(7): GM's determination is based on:

On October 20, 2010, Transport Canada requested strength test values to conduct audit testing for the child restraint anchorage standards. After locating the FMVSS 225 (CMVSS 210.1 equivalent) GM validation test report, GM learned that the vehicles built with only a front bench seat and no rear seats, did not have user-ready access for the front center child seat tether anchorage. The anchorage is concealed behind the trim panel. Also the Owner's Manual did not contain the required step by step instructions for attaching a child restraint top tether in the front center seating position.

The issue was presented to the Field Performance Evaluation Review Committee and on November 11, 2010, the Executive Field Action Decision Committee decided to conduct a noncompliance recall.
573.6(c)(8): Dealers are to service all vehicles subject to this noncompliance recall at no charge to customers, regardless of mileage, age of vehicle, or ownership, from this time forward if the customer requests the repair. In addition, all owner letters will include an Owner Manual Supplement that describes how to install a child restraint using a top tether in the center position.
GM will provide the dealer bulletin and owner letter mailing information when available.
Pursuant to 577.11 (e), GM does not plan to provide notice about reimbursement to owners because an owner would not be aware of the situation to have paid to have the repair prior to this recall.
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

N100367
Attachment
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573.6(c)(2)(iv): N/A

* All involved vehicles will be corrected as necessary.











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