December 17, 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 to conduct a safety related recall for certain 2005-2007 model year Cadillac CTS 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 a defect, which relates to motor vehicle safety, exists in certain 2005-2007 model year Cadillac CTS vehicles. Some of these vehicles have a condition in which repeated flexing of the Passenger Sensing System mat in the front passenger seat may cause the mat to kink, bend, or fold. This flexing can break the connections in the mat. If this occurs, the front passenger airbag could become disabled. If the airbag becomes disabled, the passenger airbag status indicator on the rearview mirror will show that the airbag is off, the AIR BAG indicator will be illuminated, and a SERVICE AIR BAG message will appear in the Driver Information Center. In the event of a crash severe enough to activate the front passenger airbag, if the airbag does not deploy, it could result in increased injury for the occupant.
573.6(c)(6): On September 8, 2010, the Office of Defects Investigation. (ODI) of the National Highway Traffic Safety Administration (NHTSA) opened a Comprehensive Inquiry (CI) 10-002 to gather additional information regarding model year (MY) 2007 Cadillac CTS vehicles manufactured by General Motors. Specifically, ODI requested further information related to the data provided by GM in its Early Warning Reporting (EWR) submissions for the First Quarter of 2007 through the Second Quarter of 2010 relating to component 14 Air Bags. Upon further investigation, GM Product Investigations found that many of the claims submitted relating to EWR component Airbags - 14, were related to labor code C8870, "inflatable restraint passenger seat suppression module, replace".

From September 2010 to December 2010, GM Product Investigations investigated this issue through statistical warranty and returned warranty parts analysis to aid in an understanding of root causes and failure mechanisms.

The issue was presented to the Field Performance Evaluation Review Committee and on December 13, 2010, the Executive Field Action Decision Committee decided to conduct a safety recall.
573.6(c)(8): Dealers are to replace the Passenger Sensing System.

GM will provide the dealer bulletin and owner letter mail dates when available.
Pursuant to $577.11(\mathrm{e})$, 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.

In addition, owners of certain other 2005-2007 model year Cadillac CTS vehicles outside the recall population that have significantly lower incident rates will be provided a special coverage. Under this special coverage, if this issue were to occur, GM will repair the vehicle free of charge up to 10 years or 120,000 miles.

Sincerely,

M. Carmen Benavides

Director, Product Investigations and Safety Regulations
573.6(c)(2),(3),(4)

573.6(c)(2)(iv): The Passenger Presence Sensor Mat was manufactured by IEE.

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\begin{aligned}
& \text { Richard W. Paige } \\
& 3001 \text { West Big Beaver Road \#600 } \\
& \text { Troy, MI } 48084 \\
& \text { (248) } 822-7804
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