

October 3, 2012

Ms. Nancy Lewis
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 Ms. Lewis:

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 2011-2013 model year (MY) Buick Regal and 2013 MY Chevrolet Malibu vehicles.

573.6(c)(1): Buick and Chevrolet Brands of General Motors Company

573.6(c)(2)(3)(4): This information is shown on the attached sheet.

573.6(c)(5): General Motors has decided that certain 2011-2013 MY Buick Regal built with RPO TT4 or T4A and 2013 MY Chevrolet Malibu built with RPO T4A vehicles fail to conform to Federal Motor Vehicle Safety Standard 108 - Lamps, Reflective Devices, and Associated Equipment. The subject vehicles are equipped with front turn single that utilize 2 bulbs in each front turn signal. In certain subject vehicles if both front turn signal bulbs burn out in either front turn signal lamp, the failure of the turn signal lamp is indicated to the driver by the turn signal arrow flashing rapidly in the instrument cluster; however, if one of the two front turn signal bulbs on either side burns out, there is no indication to the driver.

<u>573.6(c)(7)</u>: On September 6, 2012, the Electrical and Exterior Lighting System Management Team conducted a read-across review on turn signal bulb outage. For the subject vehicles, the team discovered that when one of the two front turn signal bulbs on either side burns out, there was no indication to the driver and the photometric requirements of FMVSS 108 for turn signal lamps may not be met with the remaining functioning bulb.

The issue was presented to the Field Performance Evaluation Review Committee and on September 26, 2012, the Executive Field Action Decision Committee determined vehicles were not in compliance with FMVSS 108.



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<u>573.6(c)(8)</u>: General Motors intends to submit to the agency a petition for an exemption from the notice and remedy provisions of the Safety Act because this noncompliance is inconsequential to motor vehicle safety.

<u>573.6(c)(10)</u>: GM does not at this time plan to make a statement to the media concerning the subject matter of this compliance action nor do we plan to submit any notification letters to owners or dealers. If the petition is not granted, General Motors will conduct a field action and provide the dealer bulletin and owner letter when available.

Sincerely,

M. Carmen Benavides, Director

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Product Investigations and Safety Regulations

12212 Attachment

VEHICLES POTENTIALLY AFFECTED BY MAKE, MODEL, AND MODEL YEAR PLUS INCLUSIVE DATES OF MANUFACTURE

EST. NO. W/CONDITION	* 5 %	а	
DESCRIPTIVE INFO. TO PROPERLY IDENT. VEH.	Regal with RPO TT4 Regal with RPO T4A Regal with RPO T4A	Malibu with RPO T4A	
INCLUSIVE MANUFACTURING DATES (FROM) (TO)	03/25/2011 08/07/2012 09/18/2012	09/18/2012	
INCLUSIVE MANUFACTURING (FROM)	01/20/2010 02/25/2011 12/15/2011	06/21/2011	
NUMBER INVOLVED	35,388 19,925 1,471	52,779	109,563
MODEL YEAR	2011 2012 2013	2013	
MODEL	<u> </u>	~	GM Total:
MAKE	Buick Buick Buick	Chevrolet	

^{*} All involved vehicles will be corrected as necessary, if the petition is not granted.

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

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