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By Recall Management Division at 10:08 am, May 29, 2014

May 28, 2014

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

Re: NHTSA Notification Campaign No. 14V-252

Dear Ms. Lewis:

This letter supersedes General Motors' letter of May 14, 2014, and 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 involving model year (MY) 2004-2012 Chevrolet Malibu, MY 2004-2007 Malibu Maxx, MY 2005-2010 Pontiac G6 and MY 2007-2010 Saturn Aura vehicles. Specifically, the information submitted pursuant to 49 CFR 573.6(c)(6) below supersedes information included in General Motors' letter of May 14, 2014.

573.6(c)(1): Chevrolet, Pontiac and Saturn 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 a defect which relates to motor vehicle safety exists in 2004-2012 Malibu, 2004-07 Malibu Maxx, 2005-10 Pontiac G6, 2007-10 Saturn Aura vehicles. On these vehicles, over time an increased resistance can develop in the Body Control Module (BCM) connection system and result in voltage fluctuations or intermittency in the Brake Apply Sensor (BAS) circuit that can cause service brake lamp malfunction. As a result, the service brake lamps may illuminate when the service brakes are not being applied, or may not illuminate when the service brakes are being applied. Additionally, cruise control may not engage. If cruise control is engaged, additional service brake pedal travel may be required to disengage it. Service brake pedal application may not be required to move the shift lever out of PARK, or additional service brake pedal travel may be required to move the shift lever out of PARK. Traction control, electronic stability control, and panic braking assist features, if equipped, may be disabled. Service ESC and/or Traction Control tell-tales may illuminate with this condition. These conditions may increase the risk of a crash.

573.6(c)(6): As permitted by the provisions of 49 C.F.R. 573.6(b), and pursuant to the requirements of 49 C.F.R. 573.6(c)(6), General Motors now submits the chronology of principal events that were the basis for the determination that the defect related to motor vehicle safety.



On September 15, 2008, NHTSA opened an investigation (Preliminary Evaluation) PE08-054 for model year (MY) 2005-2007 Pontiac G6 vehicles involving allegations that the stop lamps may turn on without depressing the brake pedal and also may turn off when the brake pedal is depressed.

GM responded to the questions related to PE08-054 on November 12, 2008.

During the investigation and analysis of the alleged defect in PE08-054, the Pontiac G6 warranty data indicated an elevated rate for vehicles built in the month of January 2005, which included MY 2005 and 2006. Further investigation showed that fretting corrosion in the BCM C2 connector was the root cause. GM and its supplier Delphi developed and confirmed the application of dielectric grease to the BCM C2 connector as an effective countermeasure to the fretting corrosion.

In November 2008, Inteva, the instrument panel cockpit supplier, began application of dielectric grease to the BCM C2 connector for the Pontiac G6, Chevrolet Malibu, and Saturn Aura vehicles. On December 4, 2008, GM issued Technical Service Bulletin (TSB) #08-05-22-009 regarding the application of dielectric grease to the BCM C2 connector for the MY 2005-2009 Pontiac G6, 2004-2007 Chevrolet Malibu/Malibu Maxx and 2008 Chevrolet Malibu Classic and 2007-2009 Saturn Aura vehicles.

The result of the analysis was presented to the Field Performance Evaluation Review Committee on January 16, 2009, and on January 22, 2009, the Executive Field Action Decision Committee decided to conduct safety recall 08317 (09V-036) for MY 2005 and MY 2006 Pontiac G6 vehicles built during the month of January, 2005.

On January 28, 2009, GM notified NHTSA and Transport Canada (TC) of the safety recall (safety campaign 08317) for the Pontiac G6 vehicles built in January 2005 for the US and Canada.

On January 30, 2009, NHTSA closed investigation PE08-054.

In October 2010, GM released an updated Technical Service Bulletin (TSB) 08-05-22-009C regarding intermittent brake lamp malfunctions. (TSB) 08-05-22-009C was issued to add MY 2008-2009 Chevrolet Malibu/Malibu Maxx vehicles.

On September 9, 2011, GM received an Information Request (IR) (3284-2011-0286) from Transport Canada (TC) regarding complaints from owners of vehicles outside of the safety campaign 08317. The IR requested GM of Canada to provide the population and brake lamp related claim information for all vehicles that use the same BCM C2 connector that was the subject of GM TSB #08-05-22-009C.

On October 21, 2011, GM of Canada responded to the questions related to TC IR 3284-2011-0286.

In June 2012, NHTSA provided additional complaints (VOQs) that were outside of the build dates for the brake lamp malfunctions on the Pontiac G6. In July 2012, GM and NHTSA reviewed Pontiac G6 warranty data that showed the rate of brake lamp malfunction of the vehicles built in other months remained lower than those that had been included in safety recall 08317 (09V-036).

On February 04, 2013, NHTSA opened Recall Query RQ13-001 regarding 324 complaints alleging that the brake lights do not operate properly on model year (MY) 2005-2009 Pontiac G6, 2004-2011 Malibu, and 2007-2010 Aura vehicles not included in safety recall 08317 (09V-036).

GM submitted responses to NHTSA's questions related to Recall Query RQ13-001 on March 28, 2013, April 17, 2013 and a supplement on May 17, 2013.

After the submission of the response to NHTSA, GM continued to analyze complaints and warranty claim data. GM investigated these occurrences looking for root causes that could be additional contributors to the previously identified fretting corrosion. GM's analysis at that time continued to point to fretting corrosion in the BCM C2 connector as the root cause.

On May 15, 2013, Transport Canada requested GM of Canada to provide an update of the number of all complaints, warranty claims, legal actions and techline calls with regards to the brake light failures identified in TSB# 08-05-22-009C or recall TC# 2009-023; specifically: 2005-2009 Pontiac G6, 2004-2012 Chevrolet Malibu and 2007-2010 Saturn Aura. On June 17, 2017, Transport Canada assigned their investigation number 3280-13-11 to the issue and posted the investigation to the Transport Canada web site.

On June 19, 2013, GM of Canada responded to Transport Canada's request.

On June 6, 2013, NHTSA sent GM a resume upgrading Recall Query RQ13-001 to an Engineering Analysis EA13-005.

In August 2013, as part of the ongoing investigation, additional warranty analyses indicated an elevated warranty rate for the vehicles that were built after GM began the dielectric grease application in the assembly plants in November 2008. GM reviewed the dielectric grease application process in the assembly plants, the service procedure, and continued to investigate potential additional root causes. GM also started the collection of BCM modules through the warranty returns parts center to check for the proper application of the dielectric grease.

In November 2013 GM concluded that the amount of dielectric grease applied in the assembly plant starting November 2008 was insufficient based on the warranty return parts of the BCM modules.

On November 14, 2013, NHTSA provided the questions for Engineering Analysis EA13-005. EA13-005 included all MY 2005-2010 Pontiac G6, MY 2004-2011 Chevrolet Malibu, and MY 2007-2009 Saturn Aura vehicles and added the following additional allegations: A) the brake lamps remaining illuminated at all times (including when the service brakes are not being applied) and/or failing to illuminate when the service brakes are applied; B) difficulty shifting out of PARK; C) the inability to engage the cruise control; D) the ability to move the gear shift out of PARK without the service brake applied (which may result in a roll-away event); and, E) in suitably equipped vehicles, i) the electronic stability control (ESC) does not engage and/or the ESC light illuminates, ii) the traction control does not engage and/or the traction control light illuminates, and/or, iii) disabling or otherwise affecting the performance of the panic brake-assist feature.

As part of the data analysis for this EA response, GM continued to search for additional indicators in the warranty data of fretting corrosion in the BCM C2 connector. GM also

further investigated the effect on vehicle performance of the additional alleged defects defined in the EA inquiry. GM responded to the questions for EA13-005 on December 18, 2013, January 24, 2014 and January 31, 2014.

Between December 6, 2013 and March 21, 2014, GM of Canada and Transport Canada continued to discuss the potential root causes for the subject brake lamp and associated conditions and to discuss GM's progress toward isolating the root cause(s) and an appropriate solution.

GM continued to study additional root causes of fretting corrosion and additional engineering and service improvements to eliminate fretting corrosion. In March 2014 GM engineering teams began conducting analysis and physical testing to measure the effectiveness of potential countermeasures to address fretting corrosion. As a result, GM determined that additional remedies were needed to address the fretting corrosion.

The issue was presented to the Field Performance Evaluation Review Committee on May 5, 2014, and on May 7, 2014, the Executive Field Action Decision Committee decided to conduct a safety recall.

573.6(c)(8): Dealers are to attach the wiring harness to the BCM with a spacer, apply dielectric lubricant to both the BCM C2 and harness connector and on the BAS and harness connector, and relearn the brake pedal home position.

General Motors will provide the dealer bulletin and owner letter mail dates when available.

Pursuant to 577.11, General Motors 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 May 23, 2013.

573.6(c)(10): General Motors will provide the dealer bulletin and owner letter under separate cover.

573.6(c)(11): General Motors' assigned recall number is 13036.

Sincerely,

A handwritten signature in black ink, appearing to read "B. Latouf", written in a cursive style.

Brian Latouf, Director
Field Product Investigations & Evaluations

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>
Chevrolet	Z	2004	96,607	05/16/2003	06/11/2004	Malibu	*
Chevrolet	Z	2004	35,761	06/25/2003	06/11/2004	Malibu Maxx	"
Chevrolet	Z	2005	163,824	03/30/2004	07/29/2005	Malibu	"
Chevrolet	Z	2005	48,581	03/30/2003	07/29/2005	Malibu Maxx	"
Chevrolet	Z	2006	141,688	05/26/2005	06/09/2006	Malibu	"
Chevrolet	Z	2006	35,585	01/26/2005	06/09/2006	Malibu Maxx	"
Chevrolet	Z	2007	113,983	04/03/2006	06/27/2007	Malibu	"
Chevrolet	Z	2007	13,774	04/04/2006	04/05/2007	Malibu Maxx	"
Chevrolet	Z	2008	155,564	05/15/2007	06/27/2008	Malibu	"
Chevrolet	Z	2009	176,837	04/22/2008	06/23/2009	Malibu	"
Chevrolet	Z	2010	183,814	04/07/2009	06/15/2010	Malibu	"
Chevrolet	Z	2011	211,185	04/08/2010	06/09/2011	Malibu	"
Chevrolet	Z	2012	225,863	04/19/2011	10/11/2012	Malibu	"
Pontiac	Z	2005	62,481	05/26/2004	04/01/2005	G6	"
Pontiac	Z	2006	170,412	01/11/2005	06/06/2006	G6	"
Pontiac	Z	2007	164,340	03/27/2006	06/22/2007	G6	"
Pontiac	Z	2008	154,349	04/11/2007	06/13/2008	G6	"
Pontiac	Z	2009	99,228	04/16/2008	06/12/2009	G6	"
Pontiac	Z	2010	25,586	04/23/2009	01/04/2010	G6	"
Saturn	Z	2007	64,852	04/24/2006	06/27/2007	Aura	"
Saturn	Z	2008	60,717	04/24/2007	06/27/2008	Aura	"
Saturn	Z	2009	35,473	04/22/2008	05/18/2009	Aura	"
Saturn	Z	2010	20	04/07/2009	05/26/2009	Aura	"
GM Total:			2,440,524				

* All involved vehicles will be corrected as necessary.

573.6(c)(2)(iv): Delphi
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Troy, MI 48098-2815
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The BCM, BCM connector and BAS connector are manufactured in Mexico.

Dalian Alps Electric Co. Ltd.
No. 6 Han Zheng Road
Jinzhou District
Dalian, 116100
Phone #: 86 411 767 5102

The BAS is manufactured in China.