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*By Recall Management Division at 12:29 pm, May 28, 2014*

May 27, 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-259

Dear Ms. Lewis:

This letter supersedes General Motors' letter of May 16, 2014, and is submitted pursuant to the requirements of 49 CFR 573.6 as it applies to a determination by General Motors of a noncompliance recall involving certain 2015 model year Cadillac Escalade and Escalade ESV vehicles. Specifically, the information submitted pursuant to 49 CFR 573.6(c)(2)(3)(4), 573.6(c)(7), 573.6(c)(8) and 573.6(c)(11) below supersedes information included in General Motors' letter of May 16, 2014.

573.6(c)(1): Cadillac Brand 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 2015 model year Cadillac Escalade and Escalade ESV vehicles fail to conform to Federal Motor Vehicle Safety Standard 208 for occupant crash protection. The passenger airbag module is attached to a chute adhered to the backside of the instrument panel with an infrared weld that was not sufficiently heated. This results in a partial deployment which increases the risk of injury in a crash.

573.6(c)(7): 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)(7), General Motors now submits the attached chronology of principal events that were the basis for the determination of the noncompliance with a motor vehicle safety standard.

On April 28, 2014, during scheduled product validation testing of the Cadillac "Platinum" Escalade (planned as an interim 2015 model) the passenger frontal air bag did not deploy properly. After reviewing test footage, GM engineers requested information from the supplier, Johnson Controls Inc. (JCI), regarding the area of the Escalade instrument panel (IP) through which the passenger frontal air bag deploys. Specifically, JCI was asked to provide information on chute weld integrity and score depth (that determines the remaining wall thickness at the tear seam).

On May 13, 2014, JCI notified GM Engineering of changes to the chute infrared weld process. The infrared weld process was first modified on April 2, 2014, and corrected on April 29, 2014. Both process changes were done without communication to GM until May 13, 2014.

On May 14, 2014, the issue was raised to GM's Field Performance Evaluation team and assigned to an investigator.

The Issue was presented to the Executive Field Action Decision Committee on May 14, 2014, and it was decided to conduct a noncompliance recall.

On May 14, 2014, a stop delivery message was sent to the dealers.

On May 16, 2014, a list of suspected serial numbers was obtained from JCI. These were matched to VINs through records from the scanning process used during instrument panel sub-assembly

When errors were discovered in the scanning process, GM decided to expand the population of potentially affected vehicles to include any VINs that could have received the suspect serial numbers.

There will be two populations of vehicles; one will require replacement and the other will need to be inspected against the JCI serial numbers.

On May 20, 2014, the stop delivery message was also updated.

573.6(c)(8): For recall 14220, dealers are to replace the instrument panel right side upper trim panel. For recall 14249, dealers are to inspect, and if necessary, replace the instrument panel right side upper trim panel.

General Motors sent the dealer bulletins on May 21, 2014 and anticipates mailing owner letters mid June 2014. General Motors mailed the advisory owner letters on May 16, 2014 and on May 21, 2014.

Pursuant to 577.11, General Motors 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): General Motors will provide the dealer bulletin and owner letter under separate cover when available.

573.6(c)(11): General Motors' assigned recall numbers are 14220 and 14249.

Sincerely,



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>
Recall 14220 Population							
Cadillac	3	2015	1,295	04/06/2014	05/15/2014	Escalade	*
Cadillac	3	2015	658	04/06/2014	05/15/2014	Escalade ESV	"
GM Total:			1,953				
Recall 14249 Population							
Cadillac	3	2015	570	04/06/2014	05/16/2014	Escalade	*
Cadillac	3	2015	315	04/06/2014	05/16/2014	Escalade ESV	"
GM Total:			885				

\* All involved vehicles will be corrected as necessary.

573.6(c)(2)(iv): JCI  
915 E. 32nd Street  
Holland, MI 48423  
616 394-1135

The involved part is manufactured in Mexico.

14220/14249