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July 16, 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-400

Dear Ms. Lewis:

This letter supersedes General Motors' letter of July 3, 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 2000-2005 model year (MY) Chevrolet Impala and Monte Carlo, 1997-2005 MY Chevrolet Malibu, 1999-2004 MY Oldsmobile Alero, 1998-2002 MY Oldsmobile Intrigue, 1999-2005 MY Pontiac Grand Am and 2004-2008 MY Pontiac Grand Prix vehicles. Specifically, the information submitted pursuant to 49 CFR 573.6(c)(6) below supersedes information included in General Motors' letter of July 3, 2014.

573.6(c)(1): Chevrolet, Oldsmobile and Pontiac 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 2000-2005 MY Chevrolet Impala and Monte Carlo, 1997-2005 MY Chevrolet Malibu, 1999-2004 MY Oldsmobile Alero, 1998-2002 MY Oldsmobile Intrigue, 1999-2005 MY Pontiac Grand Am, and 2004-2008 MY Pontiac Grand Prix vehicles. If the key ring is carrying added weight and the vehicle goes off road or experiences some other jarring event, it may unintentionally move the key away from the "run" position. If this occurs, engine power, power steering and power braking may be affected, increasing the risk of a crash. The timing of the key movement out of the "run" position, relative to the activation of the sensing algorithm of the crash event, may result in the airbags not deploying, increasing the potential for occupant injury in certain kinds of crashes.

Until the recall has been performed, it is very important that customers remove all items from their key ring, leaving only the vehicle key. The key fob (if applicable), should also be removed from the key ring.

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.

2003

In 2003, GM learned of a customer complaint of intermittent vehicle shut offs in a MY 2003 Grand Am from a Michigan dealership. Despite multiple attempts, the dealership could not duplicate the condition. GM's Brand Quality Manager for the Grand Am personally visited the dealership and requested that the customer demonstrate the problem. The customer had an excess key ring and mass (containing approximately 50 keys and a set of brass knuckles), and was able to recreate the shut off upon driving over a speed bump at approximately 30-35 mph. On January 7, 2003, GM opened PRTS 0084/2003. On May 22, 2003, GM issued a voicemail to dealerships describing the condition and identifying the relevant population of vehicles as 1999 through 2003 MY Chevrolet Malibu, Oldsmobile Alero, and Pontiac Grand Am. The notice directed dealers to pay attention to the key size and mass of the customer's key ring in order to better diagnose the customer's complaint. On July 24, 2003, Engineering Work Order (EWO) 211722 was initiated to increase the detent plunger force on the ignition switch replacing P/N 22688239 with P/N 22737173. This was a running change made in 2004 to the Malibu, Grand Am and the Alero. The production and service stock disposition for P/N 22688239 was designated "use", so it is possible that P/N 22688239 was used to service vehicles.

2004

On March 17, 2004, EWO 317693 was initiated to increase the detent plunger force on the ignition switch on the Grand Prix in order to maintain commonality between the Grand Prix and the Malibu, Grand Am and the Alero. The old Grand Prix part number, P/N10310896, was not changed to a new part number when the detent plunger force was changed, rather P/N 10310896 remained the part number for the new ignition switch. The service stock disposition was designated "use", so it is possible that the old switch was used to service vehicles.

2014

On May 22, 2014, NHTSA forwarded to GM Director of Global Policy and GM Director of Field Product Investigations and Evaluations a link to Service Bulletin No. 052203, issued in 2003, for the 1999-2003 MY Malibu, Alero and Grand Am. On June 4, 2014, a Product Investigations Engineer was assigned to investigate ignition switches used on the 1999-2003 MY Malibu, Grand Am and Alero; the investigation expanded to include a number of additional model vehicles. Between June 6, 2014 and June 24, 2014, the investigator worked with GM subject matter experts to gather and analyze data relating to the ignition switches used on the Malibu, Grand Am and Alero vehicles, as well as to identify other vehicles in which the relevant ignition switches were used. GM also collected and reviewed information from GM's databases, including its TREAD, warranty, customer satisfaction, and Engineering Analysis databases, and NHTSA's Vehicle Owners' Questionnaire (VOQ) database relating to vehicles using the ignition switch parts under review. From approximately June 13 through June 24, 2014, cars identified in the investigation were evaluated at the Milford Proving Ground. The road testing on the recall population indicated

that, when the slotted key with a ring is carrying added weight, the torque performance of the ignition system may be insufficient to resist energy generated when a vehicle goes off road or experiences some other jarring event, potentially resulting in the unintentional movement of the key away from the "run" position.

On June 26, 2014, the investigator made a presentation to the Safety and Field Action Decision Authority (SFADA), which decided to conduct a Safety Recall of 2000-2005 MY Chevrolet Impala and Monte Carlo, 1997-2005 MY Chevrolet Malibu, 1999-2004 MY Oldsmobile Alero, 1998-2002 MY Oldsmobile Intrigue, 1999-2005 MY Pontiac Grand Am and 2004-2008 MY Pontiac Grand Prix vehicles.

573.6(c)(8): Dealers are to install two key rings and key cover on all ignition keys.

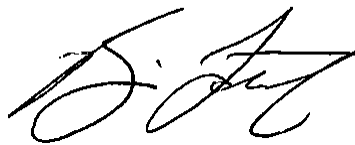
General Motors will provide the dealer bulletin and owner letter mail dates when available.

Pursuant to 577.11, General Motors does not plan to provide notice about reimbursement to owners because the provided repair has not previously been available.

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 14350.

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

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. VEHL.</u>	<u>EST. NO. W/CONDITION</u>
Chevrolet	W	2000	199,328	11/20/1998	06/13/2000	Impala	*
Chevrolet	W	2001	188,251	05/04/2000	06/25/2001	Impala	"
Chevrolet	W	2002	201,467	03/22/2001	06/19/2002	Impala	"
Chevrolet	W	2003	512,664	03/21/2002	06/18/2003	Impala	"
Chevrolet	W	2004	559,600	04/08/2003	06/24/2004	Impala	"
Chevrolet	W	2005	486,224	03/31/2004	06/15/2005	Impala	"
Chevrolet	N	1997	100,450	10/04/1996	07/30/1997	Malibu Classic	"
Chevrolet	N	1998	231,086	06/06/1997	08/20/1998	Malibu Classic	"
Chevrolet	N	1999	213,870	03/30/1998	07/26/1999	Malibu Classic	"
Chevrolet	N	2000	215,601	04/22/1999	06/23/2000	Malibu Classic	"
Chevrolet	N	2001	186,794	03/23/2000	06/27/2001	Malibu Classic	"
Chevrolet	N	2002	144,950	03/26/2001	05/31/2002	Malibu Classic	"
Chevrolet	N	2003	177,260	03/01/2002	05/30/2003	Malibu Classic	"
Chevrolet	N	2004	98,025	03/13/2003	06/02/2004	Malibu Classic	"
Chevrolet	N	2005	83,060	03/31/2004	05/06/2005	Malibu Classic	"
Chevrolet	W	2000	61,063	03/24/1999	06/13/2000	Monte Carlo	"
Chevrolet	W	2001	68,518	05/05/2000	06/25/2001	Monte Carlo	"
Chevrolet	W	2002	137,140	03/22/2001	06/19/2002	Monte Carlo	"
Chevrolet	W	2003	67,785	03/26/2002	06/18/2003	Monte Carlo	"
Chevrolet	W	2004	62,396	04/07/2003	06/23/2004	Monte Carlo	"
Chevrolet	W	2005	35,876	04/06/2004	06/08/2005	Monte Carlo	"
Oldsmobile	N	1999	121,339	04/08/1998	07/28/1999	Alero	"
Oldsmobile	N	2000	118,392	04/14/1999	07/17/2000	Alero	"
Oldsmobile	N	2001	112,413	04/04/2000	06/27/2001	Alero	"
Oldsmobile	N	2002	79,372	03/27/2001	05/31/2002	Alero	"
Oldsmobile	N	2003	92,874	02/25/2002	05/30/2003	Alero	"
Oldsmobile	N	2004	69,524	03/07/2003	04/30/2004	Alero	"

573.6(c)(2)(3)(4) (Continued)

<u>MAKE</u>	<u>MODEL SERIES</u>	<u>MODEL YEAR</u>	<u>NUMBER INVOLVED</u>	<u>INCLUSIVE MANUFACTURING DATES</u>		<u>DESCRIPTIVE INFO. TO PROPERLY IDENT. VEH.</u>	<u>EST. NO. W/CONDITION</u>
				<u>(FROM)</u>	<u>(TO)</u>		
Oldsmobile	W	1998	99,037	11/11/1996	08/19/1998	Intrigue	”
Oldsmobile	W	1999	86,482	03/31/1998	07/02/1999	Intrigue	”
Oldsmobile	W	2000	73,382	04/07/1999	06/30/2000	Intrigue	”
Oldsmobile	W	2001	39,455	03/28/2000	06/15/2001	Intrigue	”
Oldsmobile	W	2002	25,010	03/19/2001	06/13/2002	Intrigue	”
Pontiac	N	2000	225,333	03/31/1999	07/18/2000	Grand Am	”
Pontiac	N	2001	182,220	03/30/2000	06/27/2001	Grand Am	”
Pontiac	N	2002	154,308	03/26/2001	05/31/2002	Grand Am	”
Pontiac	N	2003	299,796	10/15/1997	07/29/1999	Grand Am	”
Pontiac	N	2003	139,818	02/25/2002	05/30/2003	Grand Am	”
Pontiac	N	2004	171,929	03/07/2003	06/04/2004	Grand Am	”
Pontiac	N	2005	61,526	03/31/2004	05/06/2005	Grand Am	”
Pontiac	W	2004	179,560	10/24/2002	06/25/2004	Grand Prix	”
Pontiac	W	2005	107,997	04/01/2004	06/24/2005	Grand Prix	”
Pontiac	W	2006	116,472	04/27/2005	06/19/2006	Grand Prix	”
Pontiac	W	2007	77,690	04/12/2006	04/25/2007	Grand Prix	”
Pontiac	W	2008	64,405	03/14/2007	11/30/2007	Grand Prix	”
GM Total:			6,729,742				

* All involved vehicles will be corrected as necessary.

573.6(c)(2)(iv): Stoneridge INC
Pollak Engineered Products
300 Dan Rd
Canton, MA 02021
Phone: (248) 489-9300

The ignition switch is manufactured in the US and China.