

**From:** Timian, Jennifer (NHTSA)  
**Sent:** Friday, February 28, 2014 5:32 PM  
**To:** [CARMEN.BENAVIDES@GM.COM](mailto:CARMEN.BENAVIDES@GM.COM)  
**Cc:** Yon, Scott (NHTSA); Ong, Peter (NHTSA)  
**Subject:** Today's call

Carmen,

This is in follow-up to our conversation this afternoon. We had agreed to put our questions and requests in writing.

1. Has GM made a defect decision and filed the 573 paperwork as to every vehicle it manufactured that contained or could contain the defective ignition switch component(s) that necessitated this recall? If so, please explain what materials or information were consulted or reviewed that confirms this.

If not, please identify all vehicles by make, model, and model year that are not included in the recall, but GM knows or has any reason to suspect could have been equipped with these components either as originally manufactured or as recommended parts in service repairs.

2. Please provide copies of the briefing materials that were used during the course of GM's defect decisionmaking process and with its decisionmakers.
3. Please provide the estimated dates on which GM intends to notify purchasers of its defect decision. Please also provide the estimated dates on which GM expects to be able to launch its remedy campaign.

If possible, we would very much appreciate a written response by COB Tuesday. Please be advised that any written response may be uploaded to our recall file or any other publicly available file, so a response on letterhead may be more appropriate. Should your response include confidential business materials, you will want to consult and comply with the requirements of 49 CFR Part 512.

Thank you very much again for prompt help on this. It is most sincerely appreciated.

*Jennifer Timian*

Chief, Recall Management Division  
NHTSA  
(202) 366-0209



March 5, 2014

Jennifer Timian  
Chief, Recall Management Division  
National Highway Transportation Safety Administration  
1200 New Jersey Avenue, SE  
Washington, DC 20590

14V047

Dear Ms. Timian:

I write to submit General Motors' ("GM's") responses to the questions you posed in your e-mail dated February 28, 2014. Your questions and GM's responses follow.

- 1. Has GM made a defect decision and filed the 573 paperwork as to every vehicle it manufactured that contained or could contain the defective ignition switch component(s) that necessitated this recall? If so, please explain what materials or information were consulted or reviewed that confirms this.**

**If not, please identify all vehicles by make, model, and model year that are not included in the recall, but GM knows or has any reason to suspect could have been equipped with these components either as originally manufactured or as recommended parts in service repairs.**

Based on the information collected and reviewed to date, GM has recalled all vehicles it has reason to believe were produced with the ignition switch at issue. With respect to vehicles that could have been equipped with the ignition switch at issue as recommended parts in service repairs, GM has asked the ignition switch supplier to: (1) identify third-party suppliers and after-market parts vendors to whom the ignition switch at issue was sold; (2) identify and quarantine service parts (including ignition housing assemblies) that contain the ignition switch at issue; and (3) identify other ignition switches that share components with the ignition switch at issue. GM has not yet received this information from the ignition switch supplier and will continue to work with the supplier to ensure the safety of GM customers.

To date, the efforts taken by GM to identify vehicles produced with the ignition switch at issue include the following:

- reviewing records maintained in GM's Global Product Description System ("GPDS"), which specifies the bill of material for the assembly of each GM vehicle, and its Engineering Work Order System ("EWOS"), which describes and authorizes changes to individual vehicle parts, in order to identify all GM vehicles produced worldwide with the ignition switch at issue;



- reviewing Field Performance Reports (“FPR’s”) and Problem Resolution Tracking System (“PRTS”) reports for all of the vehicle models within the recall population, *regardless* of model year; and
- reviewing warranty claims data and TREAD database data relevant to ignition switch functionality.

Furthermore, in order to promptly and properly ensure the safety of customers affected by the recall, GM has taken the following steps:

- working closely with the supplier of replacement parts in order to expedite production; and
- requiring end-of-assembly-line testing and validation of the torque performance of all replacement parts.

**2. Please provide copies of the briefing materials that were used during the course of GM’s defect decision making process and with its decision makers.**

Upon completion of the Field Performance Evaluation (“FPE”) investigation initiated in August 2011, the issue was presented to the Field Performance Evaluation Review Committee (“FPERC”) and the Executive Field Action Decision Committee (“EFADC”). These two committees reviewed the findings in early December, culminating in an EFADC meeting on December 17, 2013. Factual questions were raised at that meeting that required further analysis, the findings of which were presented at a second EFADC meeting on January 31, 2014, on which date the EFADC directed a safety recall. On February 7, 2014, GM notified NHTSA of its determination to recall 2005-2007 model year Chevrolet Cobalt and 2007 model year Pontiac G5 vehicles because of a defect related to motor vehicle safety.

Subsequently, further analysis was conducted regarding the scope of the recalled vehicle population. Upon completion of this analysis, the issue was presented to the EFADC on February 24, 2014, on which date the EFADC directed a safety recall of 2006-2007 model year Chevrolet HHR, 2006-2007 model year Pontiac Solstice, 2003-2007 model year Saturn Ion, and 2007 model year Saturn Sky vehicles.

Copies of the briefing materials prepared for the aforementioned EFADC meetings has been submitted to the Chief Counsel of NHTSA in accordance with the requirements of 49 C.F.R. 512.<sup>1</sup> Please note that, in the briefing materials for the EFADC meetings of December 17, 2013, and January 31, 2014, certain slides are designated as "backup" slides. These "backup" slides were not distributed to EFADC members in advance of the EFADC meetings, nor were all of them presented during the EFADC meetings.

On February 24, 2014, GM supplemented its submission to NHTSA to include a chronology of events relating to and leading to the recall. Also on February 24, GM notified NHTSA that it would also recall 2006-2007 model year Chevrolet HHR, 2006-2007 model year Pontiac Solstice, 2003-2007 model year Saturn Ion, and 2007 model year Saturn Sky vehicles for the same condition affecting the initial recall population.

**3. Please provide the estimated dates on which GM intends to notify purchasers of its defect decision. Please also provide the estimated dates on which GM expects to be able to launch its remedy campaign.**

GM anticipates mailing letters to vehicle owners affected by NHTSA Recall No. 14V-047 during the week of March 10, 2014, to advise them of the recall. We expect the first parts to be available beginning in April, with parts availability improving as time goes on. GM plans to send a follow-up notification to owners on or about April 7, 2014, informing them that they can contact dealers to arrange for repair appointments. 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)(8)(ii), General Motors hereby supplements its letter of February 24, 2014, with this information.

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<sup>1</sup> GM submits that certain information contained in these documents is entitled to confidential treatment under 5 U.S.C. § 552(b) because it constitutes confidential business information as described in 5 U.S.C. § 552(b)(4) and should be withheld from public disclosure.

Please note that, on page two of the briefing materials for the EFADC meeting of February 24, 2014, the number of fatalities relating to four incidents in which 2003-2007 model year Saturn Ion vehicles were involved in frontal impacts and frontal air bags did not deploy is listed as five. Further analysis has determined that the correct number of fatalities relating to these four incidents is four. In one of these crashes, the right front passenger was killed and the driver was injured. Because representatives of each of these persons filed separate claims with GM, GM Legal Staff opened two files relating to this one crash. Because each of these two files listed the same fatality of the right front passenger, this fatality was mistakenly double-counted.

Should you require further information, please do not hesitate to call me.

Sincerely,

A handwritten signature in black ink, appearing to read "M. Carmen Benavides". The signature is fluid and cursive, with a large, stylized initial "M" and a long, sweeping underline.

M. Carmen Benavides, Director  
Product Investigations and Safety Regulations

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GENERAL MOTORS LLC  
Vehicle Safety and Crashworthiness

March 7, 2014

Jennifer Timian, Chief  
Recall Management Division  
Office of Defects Investigation  
National Highway Traffic Safety Administration  
1200 New Jersey Ave, SE, Room W48-302  
Washington, DC 20590

Dear Ms. Timian:

In follow up to my March 5, 2014 letter, I am writing to update General Motors' ("GM's") responses to the questions posed in your February 28, 2014 e-mail.

In my letter of March 5, 2014, GM's response to Question 1 stated in part that "GM has asked the ignition switch supplier to: (1) identify third-party suppliers and after-market parts vendors to whom the ignition switch at issue was sold; (2) *identify and quarantine service parts (including ignition housing assemblies) that contain the ignition switch at issue*; and (3) identify other ignition switches that share components with the ignition switch at issue" (emphasis added).

Through further review, GM determined that it may not have specifically asked the supplier to identify and quarantine service parts (including ignition housing assemblies) that contain the ignition switch at issue. Today, GM asked the supplier, in writing, to do so.

GM will further supplement this response when it receives the requested information from the ignition switch supplier.

Sincerely,

M. Carmen Benavides, Director  
Product Investigations and Safety Regulations

