



January 12, 2024

### **Accounting of Non-Responsive Owners in Recall 15V323**

GM's January 12, 2024 Takata Dashboard submission categorizes 484 vehicles recalled under 15V323 as unrepaired with non-responsive owners. To be eligible for this category, a vehicle must meet the following criteria approved by NHTSA:

- At least 24 months have passed since the current owner was sent initial notification of an available remedy for the recall;
- At least 20 additional subsequent attempts were made to contact the current owner; these attempts include at least 8 attempts through direct mail and may also include email, phone calls, or digital media outreach.

Unrepaired vehicles with non-responsive owners are eligible for this categorization only if the above criteria are met and there are no mail returns through U.S. Postal Service (USPS) or the National Change of Address (NCOA) registry.

GM sends recall owner communications using state registration contact information that is updated monthly. Additionally, for the Takata recalls, GM monitors our internal sales and service database for any updated contact information reported from GM dealers and cross references the data as an additional contact source.

#### Data sources:

- State registrations: S&P Global Mobility/IHS Markit/RL Polk – updated monthly (quarterly for non-actionable status);
- Dealer contact information: GM sales and service database – updated weekly.

#### Deliverability monitoring:

- Mail returns through U.S. Postal Service (USPS) – updated every direct mail campaign;
- National Change of Address (NCOA) registry – updated quarterly.

Unrepaired vehicles with non-responsive owners eligible for this categorization would continue to receive communications via direct mail at least twice per year ongoing.

Unrepaired vehicles with non-responsive owners eligible for this categorization will be monitored for registration updates and vehicle status changes. Any updates to the vehicle status will be accounted for using Takata Recall ACRO guidelines.

- A change in registration information will move the vehicle back to the unrepaired and active category; the outreach process and timing will start again.
- If supporting data moves the vehicle into an “out of transit” category (3 years unregistered/salvaged/scrapped/export/ stolen), the vehicle status will remain unrepaired with the possibility for the vehicle to be repaired at a GM dealership.

Data sources:

- National Motor Vehicle Title Information System (NMVTIS) data: Harbor Business Partners – updated daily;
- State registrations: S&P Global Mobility/IHS Markit/RL Polk – updated monthly/quarterly (non-actionable status);
- Carfax active service monitoring/3 years unregistered validation: S&P Global Mobility/IHS Markit/Carfax – updated quarterly.

Registration data, outreach campaign records, and categorization of vehicle’s data will be retained in the GM’s databases and will be subject to audit by NHTSA.