



May 27, 2016

Attachment to Preliminary DIR
GM # 49151

The following is included here to address information that exceeds the NHTSA Recall portal field size limit of 2000 characters, relative to the 573 submission of GM tracking number 49151 on May 27, 2016.

573.6(c)(5) Description:

On May 3, 2016, NHTSA announced that it had amended the November 3, 2015 Consent Order with TK Holdings Inc. (“Takata”), which required Takata to issue defect information reports (“DIRs”) for all frontal phased stabilized ammonium nitrate (“PSAN”) inflators without a drying agent (or desiccant) not currently under recall (the “Amendment”). On May 16, 2016, Takata submitted DIRs covering, among other inflators, SPI (Smokeless Passenger Inflator) and PSPI-L (Programmable Smokeless Passenger Inflator) model airbag inflators without chemical drying agents sold to multiple OEMs, including GM.

After reviewing the available information, data, and analysis, GM believes that the vehicles it manufactured with these inflators do not contain a present defect which poses an unreasonable risk to motor vehicle safety. NHTSA estimates that “the service life expectancies of these inflators range from 6 to 25 years, depending on environmental exposure, among other factors.” Amendment ¶ 8. GM believes its analysis of inflators in the subject GM vehicles from the field, including areas of High Absolute Humidity, does not show significant propellant degradation at the present time and GM does not believe that the PSPI-L and SPI inflators supplied to GM will experience the type of propellant degradation required to cause an unreasonable risk of inflator rupture before 2019, if at all. Given that GM has not determined that a safety defect exists, GM is filing this Preliminary DIR in light of NHTSA’s Amended Consent Order directing that, “[t]he filing of DIRs by Takata will trigger the vehicle manufacturers’ obligations to file DIRs,” the Coordinated Remedy Order. (See CRO ¶ 46), and NHTSA regulations. See 49 C.F.R. Part 573. We are not aware of any cases of inflator ruptures in any passenger airbag inflators in our vehicles worldwide.

Notwithstanding the foregoing, GM will conduct a recall of its airbag inflators covered by the May 2016 Takata DIRs, unless GM is able to prove to NHTSA’s satisfaction that the inflators in its vehicles do not pose an unreasonable risk to safety. Such a showing must be made prior to the governing supply deadlines in the Coordinated Remedy Order and any amendments thereto. See CRO and Consent Order Amendment.



This Preliminary DIR covers vehicles registered in Zone A as described in the Amendment.

573.6(c)(5) Risk:

Takata's DIR indicates that Takata believes these inflators perform as designed and "do not pose an unreasonable risk to safety until they reach a certain level of propellant degradation." Further, Takata states that propellant degradation—and, by extension, risk of rupture—varies "in different vehicle makes and models, and in different inflator and propellant configurations." NHTSA acknowledged that "the potential for propellant degradation and the expected rate . . . will vary considerably depending on the type of inflator at issue and the specific vehicle makes and models in which the inflators were installed." NHTSA's expert, Dr. Harold R. Blomquist, reached a similar conclusion, finding that "vehicle platform . . . can affect in-vehicle temperature and humidity near the inflator." Thus, NHTSA has established a five-stage, risk-based schedule for these Takata airbags to be recalled over a 43 month period of time ending in December 2019. In addition, due to the unavailability of sufficient replacement inflators with a drying agent and NHTSA's view that the risk of rupture is less in newer vehicles, NHTSA has mandated a phased approach to inflator replacements so that vehicles with the highest risk factors can be remedied first. We expect to work with NHTSA to provide additional testing data in support of a risk based approach to any remediation which may be required.

GM agrees with NHTSA that "not all non-desiccated frontal Takata PSAN inflators will have reached the point where they pose an unreasonable risk to safety by December 2019." . Based upon our analysis and data, GM believes the inflators in its GMT 900 vehicles are currently performing as designed, show no significant signs of propellant degradation and, therefore, will not pose an unreasonable risk to motor vehicle safety, if at all, for at least the next three years given the unique vehicle platform and design characteristics of the GMT 900 vehicles and the differences in the Takata passenger-side inflators in those vehicles. Further, GM's field deployment data contains no reports of inflator rupture in these vehicles during the estimated 44,000 field deployments that have occurred in these vehicles since the start of production or in the ballistic testing of inflators recovered from vehicles in the field.

GM has initiated a third-party environmental conditioning study that will simulate long-term temperature cycling in Takata inflators in GM vehicles to continue assessing inflator aging and estimate likely service life. GM is establishing a part return program that will collect and CT scan Takata inflators recovered from GM vehicles, primarily from the High Absolute Humidity regions. And GM is continuing to aggressively monitor and study the performance of Takata airbag inflators in GM vehicles in the field.



573.6(c)(8) Remedy:

As referenced in the Amendment to Consent Order and in NHTSA's public announcements, NHTSA will be convening a meeting of OEMs to discuss changes to the Coordinated Remedy Order and NHTSA's Coordinated Remedy Program in light of the Amendment to Consent Order and Takata's May 16, 2016 DIRs. GM will discuss remedy plans and customer outreach and timing with NHTSA in connection with the Coordinated Remedy Program, and will cooperate with NHTSA. GM will update this section once those discussions with NHTSA are complete.

As noted above, GM has initiated a third-party environmental conditioning study that will simulate long-term temperature cycling in Takata inflators in GM vehicles to continue assessing inflator aging and estimate likely service life. GM is establishing a part return program that will collect and CT scan Takata inflators recovered from GM vehicles, primarily from the High Absolute Humidity regions. And GM is continuing to aggressively monitor and study the performance of Takata airbag inflators in GM vehicles in the field. We expect to provide NHTSA with additional test data, analysis or other relevant and appropriate evidence in support of our belief that our vehicles do not pose an unreasonable risk to safety.