



April 26, 2018

## Chronology of Defect / Noncompliance Determination

### 573.6 (c) (6) (7)

*Describe the chronology of events leading up to the defect decision or test data for the noncompliance decision:*

GM first learned of Kidde's fire-extinguisher recall (Recall No. 17E062000) from Isuzu Technical Center of America, Inc. ("Isuzu") on Nov. 4, 2017. Isuzu learned from Kidde that some Isuzu-manufactured, Chevrolet-branded trucks were impacted by the Kidde recall in that they may have contained the recalled Kidde fire extinguishers when sold as new vehicles. On Nov. 14, 2017, Isuzu issued a safety recall, based on Kidde's recall, that included certain of the Chevrolet-branded trucks that Isuzu manufactured. (See Recall No. 17V726000). GM began immediately executing that recall with respect to the Chevrolet-branded trucks by notifying dealers and owners.

Beginning on November 17, 2017, GM began the task of determining whether any of the 134 models of recalled Kidde fire extinguishers, which went back decades, could have potentially been installed in any other GM vehicles not included in Isuzu's recall. This was necessary because Kidde does not sell fire extinguishers directly to GM and therefore GM was not identified as an impacted OEM in Kidde's defect information report. Between November 17 and late January 2018, GM worked to first identify internal part numbers for all fire extinguishers ever used in GM products between 1992 and present. From the approximately 100 part numbers identified, GM then began the complicated process of researching each of the 100 parts to identify which of those were manufactured by Kidde. Each part record had to be examined individually because GM never purchased fire extinguishers directly from Kidde—fire extinguishers were supplied by Tier 1 and Tier 2 suppliers, and often as part of a multi-component safety kit. Between late January and March 2018, GM analyzed the 100 part numbers and identified 13 as containing Kidde fire extinguishers. GM then used the RPO codes for those 13 parts to identify the affected vehicles. Of the 13 Kidde fire extinguishers used by GM, only one was being recalled by Kidde. GM then analyzed TREAD, VOQ, and warranty data and found no reports of any issues in the field.

The investigation was reviewed in GM's Open Investigation Review on April 16, 2018. On April 19, 2018, GM's Safety and Field Action Decision Authority decided to conduct a safety recall to implement the safety recall announced by Kidde with regard to the subject fire extinguishers installed as original equipment in GM vehicles.