



August 30, 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:

On April 2, 2018, a GM fleet customer towed a 2015 Chevrolet Silverado to its in-company repair shop because the brake pedal was out of place, and the driver had lost braking ability. The vehicle was repaired with a new brake pivot bolt and nut ordered from a GM dealer. On April 23, 2018, the responsible GM fleet account executive reported the issue in GM's Speak Up For Safety program given that the subject vehicle had been previously repaired at a GM dealer as part of recall 16V069 in June of 2016.

On June 14, 2018, GM's Safety & Compliance Categorization Team (SCCT) reviewed the issue and advanced it for Potential Investigation Review (PIR). A formal investigation was opened on June 19, 2018. The GM investigator determined that the fleet vehicle, during its initial recall repair in 2016, had only been inspected and did not receive adhesive on the brake pivot pedal nut, even though adherence to the recall service procedure would have required the application of thread adhesive.

The investigator reviewed repair data for recall 16V069 and determined that 18 vehicles that had received the inspection-only remedy had returned for another loose brake pedal pivot repair. At least 13 of those 18 vehicles were built with a pedal pivot bolt orientation that should have indicated to the original repairing technician that additional steps beyond inspection – including application of thread adhesive and increased torque on the nut – were necessary to secure the bolt and nut.

Subsequently, the investigator determined that, of the 53,000 vehicles that received an inspection-only remedy under the global recall, more than 37,500 were built with a bolt orientation that should have required application of thread adhesive and increased torque on the nut.

The investigator also found that other service manual procedures not related to recall 16V069, but involving removal of the brake pedal pivot nut, were not revised to include application of thread adhesive during reinstallation.

This was reviewed in GM's Open Investigation Review on August 20, 2018, and on August 23, 2018, GM's Safety Field Action Decision Authority (SFADA) decided to conduct a safety recall.