



June 24, 2021

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 September 10, 2014, GM recalled certain 2010-15 Cadillac SRX and 2011-12 Saab 9-4x vehicles after determining that, on some of those vehicles, the jam nuts in the rear toe-link adjusters may not have been torqued to the proper specification during GM's assembly process. Ref. NHTSA Recall No. 14V571. Without proper torque there was a potential for the toe link to loosen. As part of the recall remedy, GM dealers were instructed to inspect the toe links and increase the torque if necessary, or to replace the toe links if they were loose or damaged. The design was proven effective when correctly installed and torqued in accordance with GM's published service procedures.

After the 2014 recall was launched GM received isolated reports of loose toe links in vehicles that had been repaired under Recall 14V571. GM undertook an analysis of dealer repairs and determined that some dealers had failed to follow GM's service procedures. On March 30, 2015, GM revised the service procedures to help prevent further dealer errors in making the repair. These procedures were also publicly available to independent repair shops.

GM continued to monitor field performance and evaluate whether the improved service procedure effectively reduced errors in servicing. The overall rate of field reports remained low, and an improper repair was very unlikely if performed after the revised service procedures were published. Together, this data indicated that the original repair was successful in most cases, and the revised service procedure was being followed and was effective. Nevertheless, out of an abundance of caution, GM further updated the service information in October 2020 to instruct technicians to always replace the toe links rather than adjusting them after an alignment or other applicable service.

On November 6, 2020, NHTSA opened a preliminary evaluation (PE20-019) into the condition and, on December 31, 2020, issued an information request to GM. GM responded to the information request on February 18, 2021. GM concluded, consistent with its prior experience, that the condition is the result of a rare occurrence of service operator error during a rear toe alignment or other service requiring adjustment of the rear toe links. The rate of potentially related field incidents remained low, and the issue is detectable, including by traction control and Stabilitrak messages or malfunction indicator lamps, sway or wander at highway speeds or a loud clanking or chucking noises when traveling over bumps. Complete separation of the link was very rare as drivers brought the vehicle in for repair before corrosion and continued vehicle use could result in separation of the toe link.

As of the time GM refreshed its U.S. field data in connection with its response to NHTSA's information request, GM had identified 308 warranty claims and 47 other unique field and service reports that could potentially relate to the condition. These reports were submitted between November 2014 and December 2020. The total U.S. vehicle population of 382,202 had been in the field for up to 77 months.



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On June 7, 2021, NHTSA informed GM that it had received additional field reports potentially relating to the condition. In a subsequent meeting, NHTSA expressed its view that the risk of improper service following the initial safety recall warranted a follow-up recall. After discussions with NHTSA, GM decided on June 17, 2021 to conduct this safety recall. All vehicles previously recalled under 14V571 are included in this decision. Any vehicles remaining open under 14V571 will be closed.