



August 20, 2021

N212333380 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 March 10, 2021, a GM employee submitted a report to GM's Speak Up for Safety program after reviewing a warranty claim for a low-mileage 2021 Cadillac XT4 alleging a loud clicking noise was heard emanating from the passenger-side rear seat belt. The dealer had determined that the noise was caused by a missing lower fastener in the retractor assembly.

GM assigned a safety forensics engineer (SFE) to perform a preliminary analysis. The SFE undertook a search for similar allegations and discovered three additional potentially related claims (one of which was later ruled out) also involving XT4 vehicles. In each case an occupant heard unusual noise that was determined to be caused by a loose or missing fastener in a rear seat belt retractor. Further, each of these vehicles had been manufactured at GM's Fairfax, KS assembly plant. The SFE contacted the plant's quality engineering manager who determined that all three of these vehicles had similar repair procedures performed on them during the assembly process, but it was unclear whether this may have contributed to the condition.

On May 4, 2021, GM opened a formal investigation into the condition. The assigned investigator determined that 2016-2021 Chevrolet Malibu vehicles assembled at Fairfax use the same assembly process on the right-hand rear side and therefore added these vehicles to the scope of the investigation.

The investigator retrieved field data for the entire population of approximately 1.4 million 2019-2021 XT4 and 2016-2021 Malibu vehicles produced at Fairfax and found no additional related claims. Separately, the investigator undertook an analysis of the repair procedure and determined that the procedure could have been the cause of the loose or missing fasteners under a specific set of circumstances that was unlikely to occur, but possible. The investigator retrieved plant manufacturing records to determine whether other vehicles were subject to similar repairs. Those records identified 437 such vehicles out of the total population. VIN tracing was completed by the plant on July 29, 2021. Testing was also conducted that determined it was possible for the condition to be present with the absence of warning noises, even though each of the three relevant field reports did describe audible warning signs.

While no additional field reports had been found and the repair procedures are effective if performed correctly, GM's Open Investigation Review board recommended a safety recall on August 9, 2021 to inspect the retractor fasteners in the other 437 vehicles that had been repaired and, if necessary, to replace the fasteners. 402 of the vehicles are located in the United States.

On August 13, 2021, GM's Safety Field Action Decision Authority (SFADA) decided to conduct a safety recall. GM is not aware of any accidents or injuries associated with this condition.