



GENERAL MOTORS LLC  
Global Interior and Safety Center

November 9, 2010

Scott Yon, Chief  
Vehicle Integrity Division  
Office of Defects Investigation  
National Highway Traffic Safety Administration  
1200 New Jersey Ave., S. E., Room W46-409  
Washington, D.C. 20590

N100337

NVS-212llh  
PE10-031

Dear Mr. Yon:

This letter is General Motors (GM) response to your Preliminary Evaluation (PE), dated September 24, 2010, requesting GM peer vehicle data to assist in your investigation of allegations of crash related fire hazards associated with the fuel storage systems on model years (MY) 1993-2004 Jeep Grand Cherokee vehicles.

The GM peer vehicles for which GM is providing information are the 1993-2004 MY Chevrolet Blazers.

Your requests and our corresponding replies are as follows:

1. **State within the body of the response letter a summary table, by model and model year, the number of subject vehicles GM has manufactured for sale or lease in the United States. Separately, for each subject vehicle manufactured to date by GM, state the following:**
  - a. **Vehicle identification number (VIN);**
  - b. **Model year;**
  - c. **Whether or not the vehicle was originally equipped (manufactured) with a brush guard, skid guard, or covering for the bottom of the fuel tank (i.e., a protective guard);**
  - d. **If not originally equipped, whether or not a protective guard was optionally available from GM, and if so, the part number of the optionally available protective guard;**
  - e. **Date of manufacture (in "dd/mm/yyyy" date format);**
  - f. **Date warranty coverage commenced (in "yyyy/mm/dd" date format); and**
  - g. **The State in the United States where the vehicle was originally sold or leased (or delivered for sale or lease).**

**Provide the table in Microsoft Access 2007, or a compatible format, entitled "SUBJECT VEHICLE PRODUCTION DATA."**



General Motors production information is retrieved through the Global Analysis Reporting Tool database (GART). The database does not contain production information prior to the 1997 MY. Consequently, GM is providing all of the requested production information for the 1997 – 2004 MY peer vehicles. GM is providing only the number of peer vehicles produced for the 1994 – 1996 MY peer vehicles from the GM TREAD Database and production information for the 1993 MY peer vehicles is not available. The available information regarding the number of peer vehicles produced for sale or lease in the United States for the 1994 – 2004 MY are shown in Table 1.

MODEL YEAR	CHEVROLET BLAZER
1994	182,319
1995	222,573
1996	254,588
1997	208,871
1998	242,063
1999	198,422
2000	249,507
2001	163,751
2002	103,341
2003	55,096
2004	50,857
TOTAL	1,931,388

TABLE 1 GM PEER VEHICLE PRODUCTION

The GM production information requested in 1a-1g is provided on the Att\_1\_GM disk in the folder labeled "Q\_01"; refer to the Microsoft Access 2000 file labeled, "Q\_01\_PRODUCTION DATA" for the 1997 – 2004 MY peer vehicles. The GM production information requested in 1a-1g is not available in the GM database for the 1993 – 1996 MY peer vehicles as explained above. However, in response to 1c and 1d, all of the 1993 – 1996 peer vehicles were designed and built with a fuel tank shield.

GM has labeled a column in the file "shield" in response to 1c and d. If the vehicle was originally manufactured with a shield as standard equipment the column contains "std". If the vehicle was originally manufactured with a shield as optional equipment the column contains "ZM5", the regular production option code for the shield. GM is providing the state where the vehicle was shipped in response to 1g. For some of the subject vehicles, which have incomplete warranty files, the GM warranty system does not contain a warranty start date or state where the vehicle was shipped and, therefore, these fields are blank in the Microsoft Access 2000 file.

- 2. State the number of each of the following, received by GM, or of which GM is otherwise aware, which relate to, or may relate to, the potential defect in the subject vehicles:**
  - a. Consumer complaints;**
  - b. Field reports, including dealer field reports;**
  - c. Reports involving a crash, fire, injury, or fatality, based on claims against the manufacturer involving a death or injury, and notices received by the manufacturer alleging that a death or injury was caused by a possible defect in a subject vehicle;**
  - d. Property damage claims;**
  - e. Third-party arbitration proceedings where GM is or was a party to the arbitration; and**
  - f. Lawsuits, both pending and closed, in which GM is or was a defendant or codefendant.**

For subparts "a" through "d" state the total number of each item (e.g., consumer complaints, field reports, etc.) separately. Multiple incidents involving the same vehicle are to be counted separately. Multiple reports of the same incident are also to be counted separately (i.e., a consumer complaint and a field report involving the same incident in which a crash occurred are to be counted as a crash report, a field report and a consumer complaint).

In addition, for items "c" through "f," provide a summary description of the alleged problem and causal and contributing factors and GM's assessment of the problem, with a summary of the significant underlying facts and evidence. For items "c" through "f" identify the parties to the action, as well as the caption, court, docket number, and date on which the complaint or other document initiating the action was filed, and details of the resolution of the matter.

Include reports in which the subject vehicle was struck in the rear by another vehicle. As used here, rear includes crashes in which the striking vehicle hit the subject vehicle at an angle that included the rear, and is not limited to direct crashes to the rear of the subject vehicle. Fire reports where the ignition source was from other than the crash are responsive and are to be included in your response. Reports of fuel leaks or fires where no crash occurred, such as fuel leaks that occur in garages or from punctures from running over objects in the road (but unrelated to a crash), are not within the scope of this request. Also, reports in which the fuel leak or fire originated in the engine compartment area, or where the fire was caused by an electrical issue (e.g., dash wiring or seat heater) or from a non-vehicle related source (e.g., a lit cigarette, or a lit match), as opposed to a fuel leak, are also outside the scope of this request.

Table 2-1 summarizes records that may relate to the alleged defect in the subject peer vehicles. GM has organized the records by the GM file number within each attachment. Refer to access database "Q\_03\_REQUEST NUMBER TWO DATA" for categories prescribed by the NHTSA.

TYPE OF REPORT	GM REPORTS	SUBCATEGORIES			
		NUMBER WITH PROPERTY DAMAGE	NUMBER WITH CRASH	NUMBER WITH INJURIES/FATALITIES*	NUMBER WITH FIRES
Owner Reports	1	0	1	1	1
Field Reports	0	0	0	0	0
Not-In-Suit Claims	2	0	2	2	2
Subrogation Claims	0	0	0	0	0
Third Party Arbitration Proceedings	0	0	0	0	0
Product Liability Lawsuits	1	1	1	1/1	1
Total Reports (Including Duplicates)	4	1	4	4/1	4
Total Vehicles with Reports (Unique VIN)	3	1	3	3/1	3

TABLE 2-1: GM SUBJECT PEER VEHICLE - MAY RELATE TO ALLEGED DEFECT - REPORT CLASSIFICATION

\* THERE WAS 1 FATALITY ASSOCIATED WITH THIS ISSUE

To date, GM's investigation of the alleged defect has not included an assessment of the cause(s) of each incident responsive to request 2. Some incident reports may not contain sufficient reliable information to accurately assess cause.

The search for responsive information for this request included all the peer vehicle model years, 1993 – 2004 MY. The sources of the requested information and the last date the searches were conducted are tabulated in Table 2-2.

SOURCE SYSTEM	LAST DATE GATHERED
Customer Assistance Center	10/20/10
Technical Assistance Center	10/26/10
Field Information Network Database (FIND)	10/20/10
Field Product Report Database (FPRD)	10/13/10
Company Vehicle Evaluation Program (CVEP)	10/13/10
Captured Test Fleet (CTF)	10/13/10
Early Quality Feedback (EQF)	10/13/10

- 3. Separately, for each item (complaint, report, claim, notice, or matter) within the scope of your response to Request No. 2, state the following information:**
- a. GM's file number or other identifier used;**
  - b. The category of the item, as identified in Request No. 2 (i.e., consumer complaint, field report, etc.);**
  - c. Cause: 1) Whether the potential defect occurred due to the failure of or damage to a subject component or 2) whether the potential defect occurred due to an unknown, undetermined, or ambiguous causation.**
  - d. Vehicle owner or fleet name (and fleet contact person), address, and telephone number;**
  - e. Vehicle's VIN;**
  - f. Vehicle's model year;**
  - g. Vehicle's mileage at time of incident;**
  - h. Incident date;**
  - i. Report or claim date;**
  - j. Whether a fire is alleged;**
  - k. Whether property damage is alleged;**
  - l. Number of alleged injuries, if any; and**
  - m. Number of alleged fatalities, if any.**

**Provide this information in Microsoft Access 2007, or a compatible format, entitled "REQUEST NUMBER TWO DATA."**

The requested GM information is provided on the Att\_1\_GM disk in the folder labeled "Q\_03"; refer to the Microsoft Access 2000 file labeled, "Q\_03\_REQUEST NUMBER TWO DATA". Some incident reports may not contain sufficient reliable information to accurately answer all parts of request 3.

- 4. Produce copies of all documents related to each item within the scope of Request No. 2 items a, b, c, d, e, and f. The documents requested specifically include any police reports in GM's possession which relate to, or may relate to, the crash, fuel leak or fire, and any accident reconstruction documents by any party. Organize the documents separately by category (i.e., crash reports, lawsuits, etc.) and describe the method GM used for organizing the documents.**

Copies of the records summarized in Table 2-1 are embedded in the file provided in ATT\_1\_GM disk; folder labeled "Q\_03"; refer to the Microsoft Access file labeled "Q\_03\_REQUEST NUMBER TWO DATA". GM has organized the records by the GM file number within each attachment.

To date, GM's investigation of the alleged defect has not included an assessment of the cause(s) of each incident responsive to request 2. Some incident reports may not contain sufficient reliable information to accurately assess cause.

- 5. For each design variation of the subject vehicle, provide the following information:**
- a. Applicable model years or other design variation details (generation number, sub-model, trim level, etc.)**
  - b. Side, rear, and top view drawings showing the placement of the subject components and related components that secure them in the vehicle;**
  - b. A bottom view drawing or photograph showing the full vehicle undercarriage in the fully built configuration including the locations of the subject components; and**
  - c. Type of material the subject fuel tank is composed of (e.g., HDPE plastic).**

The requested information is provided on the Att\_1\_GM disk in the folder labeled "Q\_05" in the file labeled "Q5 NHTSA Peer IR PE10-031\_N100337".

\* \* \*

GM claims that certain information, in documents that are part of lawsuit and claims files maintained by the GM Legal Staff, is attorney work product and/or privileged. That information includes notes, memos, reports, photographs, and evaluations by attorneys (and by consultants, claims analysts, investigators, and engineers working at the request of attorneys). GM is producing responsive documents from claims files that are neither attorney work product nor privileged, and withholding those that are attorney work product and/or privileged.

This response is based on searches of General Motors (GM) locations where documents determined to be responsive to your request would ordinarily be found. As a result, the scope of this search did not include, nor could it reasonably include, "all divisions, subsidiaries (whether or not incorporated) and affiliated enterprises and all of headquarters, regional, zone and other offices and their employees, and all agents, contractors, consultants, attorneys and law firms and other persons engaged directly or indirectly (e.g., employee of a consultant) by or under the control of GM (including all business units and persons previously referred to), who are or, on or after July 1, 1992, were involved in any way with any of the following related to the potential defect in the subject vehicles:

- a. Design, engineering, analysis, modification or production (e.g. quality control);
- b. Testing, assessment or evaluation;
- c. Consideration or recognition of potential or actual defects, reporting, record-keeping and information management, (e.g., complaints, field reports, warranty information, part sales), analysis, claims, or lawsuits; or
- d. Communication to, from or intended for zone representatives, fleets, dealers, or other field locations, including but not limited to people who have the capacity to obtain information from dealers."

This response was compiled and prepared by this office upon review of the documents produced by various GM locations, and does not include documents generated or received at those GM locations subsequent to their searches.

Please contact me if you require further information about this response or the nature or scope of our searches.

Sincerely,



M. Carmen Benavides  
Director, Product Investigations  
and Safety Regulations

Attachments