



Date: ~~July 28, 2004~~ 7/23/2004

GM-651A (EA04-012)

On The Cover:

- GM Assigned IR Number
- NHTSA Assigned Evaluation Number
- Number of Books
- Allegation Title, Model Year and Make
- Date Received from NHTSA
- GM Reply Date

Book 1:

- Tab (1) GM Response Letter to NHTSA
- Tab (2).....NHTSA Letter
- Tab (3)..... Response For Q 3 with (1) CD
- Tab (4)..... Response For Q 5 with (1) CD
- Tab (5)..... Response For Q 7 with (1) CD
- Tab (6)..... Response For Q 8 with (1) CD
- Tab (7)..... Response For Q 10 with (1) CD
- Tab (8)..... Response For Q 11 with (1) CD
- Tab (9)..... Response For Q 12 with (1) CD
- Tab (10)..... Response For Q 13 with (1) CD
- Tab (11)..... Response For Q 14 with (1) CD
- Tab (12)..... Confidential Response For Q 15 CD Removed and sent to Office of Chief Counsel



July 23, 2004

Kathleen C. DeMeter, Director
 Office of Defects Investigation
 NHTSA Enforcement
 Room #5328
 400 Seventh Street, S.W.
 Washington, D.C. 20590

GM-851A

NVS-214ns
 EA04-012

Dear Ms. DeMeter:

This letter is General Motors (GM) response to your information request (IR), dated June 7, 2004 regarding allegations of hydraulic pump failures resulting in loss of power assist for steering and/or braking in 2000 - 2004 model year (MY) Chevrolet and GMC 2500 and 3500 series trucks and vans.

Your questions and our corresponding replies are as follows:

1. Separately state, by model and model year, the number of subject vehicles that 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. Make;
 - c. Model;
 - d. Model Year;
 - e. Date of manufacture;
 - f. Date warranty coverage commenced.

Provide the table in Microsoft Access 2000, or a compatible format, entitled "PRODUCTION DATA." See Enclosure 1, Data Collection Disc, for a pre-formatted table which provides further details regarding this submission.

General Motors is providing the number of subject vehicles produced for sale or lease in the United States by model and model year in Table 1 below:

MODEL	2000 MY	2001 MY	2002 MY	2003 MY	2004 MY*	TOTAL
Chevrolet Avalanche	0	0	6,087	2,104	1,461	9,652
Chevrolet Silverado/Fleetside	193,366	186,959	206,088	218,081	234,154	1,039,668
Chevrolet Suburban	7,918	17,198	7,881	8,233	7,401	48,632
Chevrolet Express	82,489	74,168	75,321	60,081	67,839	349,898
GMC Sierra	82,908	57,292	62,775	64,972	71,559	319,206
GMC Yukon XL	2,604	5,518	2,590	3,013	2,390	16,115
GMC Savana	31,968	26,523	26,381	23,307	31,268	141,467
TOTAL	380,973	369,659	367,121	380,781	405,882	1,924,436

Table 1 Vehicle Production

*Vehicle production as of June 10, 2004

Product Investigations

Mail Code: 480-108-304 • 30500 Mound Road • Warren, MI 48090-9055
 Phone: (586) 966-8029 • Fax: (586) 947-2318
 GM851A Response



The production information requested in 1a-1f for the 2000 - 2002 MY subject vehicles was provided in the February 23, 2004, GM response to PE04-004. The production information requested in 1a-1f for the 2003 - 2004 MY subject vehicles is provided on the CD labeled Response to Q1; refer to 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 alleged defect in the subject vehicles:
 - a. Consumer complaints, including those from fleet operators;
 - b. Field reports, including dealer field reports;
 - c. Reports involving a crash, injury, or fatality, based on claims against the manufacturer involving a death or injury, notices received by the manufacturer alleging or proving that a death or injury was caused by a possible defect in a subject vehicle, property damage claims, consumer complaints, or field reports;
 - 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 "f," 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 e and 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.

GM's response to PE04-004 included records responsive to this request for the 2000 - 2002 MY subject vehicles. These records were last gathered on the dates indicated in Table 2-2 of the GM response to PE04-004.

Table 2-1 below summarizes the records that could relate to the subject condition for the 2000 - 2002 MY subject vehicles that GM received between the dates in Table 2-2 of the GM response to PE04-004 and the last gathered dates in Table 2-2 below. Table 2-1 also includes the records that could relate to the subject condition for the 2003 - 2004 MY subject vehicles.

TYPE OF REPORT	COUNT (INCLUDING DUPLICATES)	GM REPORTS	GM REPORTS CORRESPONDING TO NHTSA REPORTS PROVIDED	LOCATION OF REPORTS (ATTACHMENT)	NUMBER WITH PROPERTY DAMAGE	NUMBER WITH INJURIES/FATALITIES*	NUMBER WITH CRASH
Owner Reports	12	12	0	2A	0	0	0
Field Reports and Technical Assistance System Reports	18	18	0	2B	2	0	3
Not-In-Suit Claims	1	1	0	2C	0	0	1
Subrogation Claims	2	2	0	2D	1	1	2
Third Party Arbitration Proceedings	0	0	0	N/A	0	0	0
Product Liability Lawsuits	0	0	0	N/A	0	0	0
Total (Including Duplicates)	33	33	0	N/A	3	1	6
Total (Excluding Duplicates)	33	33	0	N/A	3	1	6

Table 2-1: Report Breakdown

N/A Not Applicable

* GM is not aware of any fatalities related to the subject condition.

The sources of the requested information and the last date the searches were conducted are tabulated in Table 2-2 below.

SOURCE SYSTEM	LAST DATE GATHERED
Corporate Central File	6/16/2004
Customer Assistance Center	6/18/2004
Technical Assistance Center	6/15/2004
Field Information Network Database (FIND)	6/10/2004
Field Product Report Database (FPRD)	6/10/2004
Company Vehicle Evaluation Program (CVEP)	6/15/2004
Captured Test Fleet (CTF)	6/15/2004
Early Quality Feedback (EQF)	6/14/2004
Legal / Employee Self Insured Services (ESIS)	6/11/2004

Table 2-2: Data Sources

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. Vehicle owner or fleet name (and fleet contact person), address, and telephone number;
 - d. Vehicle's VIN;
 - e. Vehicle's make, model and model year;

- f. Vehicle's mileage at time of incident;
- g. Incident date;
- h. Report or claim date;
- i. Whether a crash is alleged;
- j. Whether property damage is alleged;
- k. Number of alleged injuries, if any; and
- l. Number of alleged fatalities, if any.

Provide this information in Microsoft Access 2000, or a compatible format, entitled "REQUEST NUMBER TWO DATA." See Enclosure 1, Data Collection Disc, for a pre-formatted table which provides further details regarding this submission.

The requested information is provided on the CD labeled Response to Q3; refer to the Microsoft Access 2000 file.

- 4. Produce copies of all documents related to each item within the scope of Request No. 2. Organize the documents separately by category (i.e., consumer complaints, field reports, etc.) and describe the method GM used for organizing the documents.

Copies of the records identified in Item 2 are provided in the attachments listed in Table 2-1 on the CD labeled Response to Q3. GM has organized the records by the GM file number within each attachment.

- 5. State, by model and model year, a total count for all of the following categories of claims, collectively, that have been paid by GM to date that relate to, or may relate to, the alleged defect in the subject vehicles: warranty claims; extended warranty claims; claims for good will services that were provided; field, zone, or similar adjustments and reimbursements; and warranty claims or repairs made in accordance with a procedure specified in a technical service bulletin or customer satisfaction campaign.

Separately, for each such claim, state the following information:

- a. GM's claim number;
- b. Vehicle owner or fleet name (and fleet contact person) and telephone number;
- c. VIN;
- d. Repair date;
- e. Vehicle mileage at time of repair;
- f. Repairing dealer's or facility's name, telephone number, city and state or ZIP code;
- g. Labor operation number;
- h. Problem code;
- i. Replacement part number(s) and description(s);
- j. Concern stated by customer; and
- k. Comment, if any, by dealer/technician relating to claim and/or repair.

Provide this information in Microsoft Access 2000, or a compatible format, entitled "WARRANTY DATA." See Enclosure 1, Data Collection Disc, for a pre-formatted table which provides further details regarding this submission.

The 957 regular warranty claims and 18 extended warranty claims for the 2003 - 2004 MY subject vehicles that may be responsive to this request, are summarized by model and model year in Tables 5A and 5B.

Regular Warranty Claims for Power Steering Pump Replace (Labor Code E9050)

MODEL	2003MY	2004MY	TOTAL
Chevrolet Avalanche	3	1	4
Chevrolet Silverado/Fleetside	427	172	599
Chevrolet Suburban	14	4	18
Chevrolet Express	49	39	88
GMC Sierra	143	53	198
GMC Yukon XL	7	0	7
GMC Savana	20	25	45
TOTAL	663	294	957

TABLE 5A

Extended Warranty Claims for Power Steering Pump Replace

MODEL	2003MY	2004MY	TOTAL
Chevrolet Avalanche	2	0	2
Chevrolet Silverado/Fleetside	12	0	12
Chevrolet Suburban	0	0	0
Chevrolet Express	2	0	2
GMC Sierra	2	0	2
GMC Yukon XL	0	0	0
GMC Savana	0	0	0
TOTAL	18	0	18

TABLE 5B

GM's response to PE04-004 contained the requested regular and extended warranty claim information for the 2000 - 2002 MY subject vehicles as of January 13, 2004. The 863 regular and 510 extended warranty claims received after January 13, 2004 for the 2000 - 2002 MY subject vehicles are summarized in Tables 5C and 5D.

Updated Regular Warranty Claims for Power Steering Pump Replace (Labor Code E9050)

MODEL	2000MY	2001MY	2002MY	TOTAL
Chevrolet Avalanche	0	0	8	8
Chevrolet Silverado/Fleetside	45	221	258	524
Chevrolet Suburban	1	11	4	16
Chevrolet Express	15	32	31	78
GMC Sierra	19	90	73	182
GMC Yukon XL	1	5	3	9
GMC Savana	8	14	23	46
TOTAL	90	373	400	863

TABLE 5C

Updated Extended Warranty Claims for Power Steering Pump Replace

MODEL	2000MY	2001MY	2002MY	TOTAL
Chevrolet Avalanche	0	0	2	2
Chevrolet Silverado/Fleetside	81	100	51	232
Chevrolet Suburban	6	14	1	21
Chevrolet Express	48	33	26	107
GMC Sierra	40	34	19	93
GMC Yukon XL	4	11	5	20
GMC Savana	20	11	4	35
TOTAL	199	203	108	510

TABLE 5D

GM searched the GM North America Claim Adjustment Retrieval Database (CARD-regular warranty), the Motors Insurance Corporation (MIC - extended warranty), and the Universal Warranty Corporation (UWC - extended warranty) databases to collect the warranty data for this response. The warranty data was last gathered on June 14, 2004. A summary of the warranty claims in Tables 5A - 5D is provided on the CD labeled Response to Q5.

GM's warranty database does not contain the vehicle owner's name or telephone number. Some of the replacement part numbers; part descriptions and customer concern code descriptions are not included in the GM warranty database. GM is providing a field labeled "Verbatim Text" in response to request 5K (dealer/technician comment). The verbatim text is an optional field in the GM warranty system for the dealer to enter any additional comments that may be applicable to the warranty claim. The verbatim text field required to be completed for every warranty claim.

The MIC extended warranty system does not contain the following information: repairing dealer code, vehicle owner information, trouble code, trouble code description, part number, part description or verbatim. The UWC extended warranty system does not use the GM labor code or labor code description and it does not contain the repairing dealer code, trouble code or trouble code description.

The warranty data provided has limited analytical value in analyzing the field performance of a motor vehicle component. The warranty records do not contain sufficient information to establish the condition of the part at the time of the warranty correction; and service personnel may not consistently use the appropriate labor and trouble codes. Warranty numbers represent claims by our dealers for reimbursement for parts and labor costs incurred in performing warranty service for our customers.

6. Describe in detail the search criteria used by GM to identify the claims identified in response to Request No. 5, including the labor operations, problem codes, part numbers and any other pertinent parameters used. Provide a list of all labor operations, labor operation descriptions, problem codes, and problem code descriptions applicable to the alleged defect in the subject vehicles. State, by make and model year, the terms of the new vehicle warranty coverage offered by GM on the subject vehicles (i.e., the number of months and mileage for which coverage is provided and the vehicle systems that are covered). Describe any extended warranty coverage option(s) related to the alleged

defect that GM offered for the subject vehicles and state by option, model, and model year, the number of vehicles that are covered under each such extended warranty.

The GM regular warranty data was collected by searching GM CARD for the following labor code and trouble codes. The MIC extended warranty data was collected by searching only for the labor code. The UWC extended warranty data was collected by searching for the labor code descriptions related to failure or malfunction of the hydraulic pump resulting in a reduction or loss of power assist to the steering and or braking system.

LABOR CODE	DESCRIPTION:
E9050	Pump Assembly, Power Steering - Replace

TROUBLE CODE	DESCRIPTION:
1A	Bent
1D	Broken
4D	Sheared
6C	Component Inoperative

The warranty data provided has limited analytical value in analyzing the field performance of a motor vehicle component. The warranty records do not contain sufficient information to establish the condition of the part at the time of the warranty correction; and service personnel may not consistently use the appropriate labor and trouble codes. Warranty numbers represent claims by our dealers for reimbursement for parts and labor costs incurred in performing warranty service for our customers.

The subject vehicles are covered by a bumper-to-bumper new vehicle warranty for three years or 36,000 miles whichever occurs first. Many different extended warranty options are available through GM dealerships. They are offered at different prices and for varying lengths of time, based on customer's preference, up to 7 years from the date of purchase or up to a total of 100,000 vehicle miles. The General Motors warranty system does not contain information on the number of vehicles that have extended warranty coverage.

- 7. Produce copies of all service, warranty, and other documents that relate to, or may relate to, the alleged defect in the subject vehicles, that GM has issued to any dealers, regional or zone offices, field offices, fleet purchasers, or other entities. This includes, but is not limited to, bulletins, advisories, informational documents, training documents, or other documents or communications, with the exception of standard shop manuals. Also include the latest draft copy of any communication that GM's short name is planning to issue within the next 120 days.**

Attachment 7A and 7B provided on the CD labeled Response to Q7 contain Preliminary Information (PI) documents from the Technical Assistance Center (TAC) system. These PI documents applicable to 2003 - 2004 model year vehicles do not relate to any failure or malfunction of the hydraulic pump in the subject vehicles. The documents describe a condition where some customers may comment on a lack of steering assist or shudder while parked or during low speed parking lot type maneuvers that may be related to unsatisfactory performance of the hydraulic pump.

Preliminary Information documents are not bulletins. The information contained in PI documents is available only when GM field personnel and dealers enter a VIN into the TAC

system to access these documents. GM is not planning to issue any communications within in the next 120 days related to the subject condition in the subject vehicles.

8. Describe all assessments, analyses, tests, test results, studies, surveys, simulations, returned warranty part inspections, investigations, inquiries and/or evaluations (collectively, "actions") that relate to, or may relate to, the alleged defect in the subject vehicles that have been conducted, are being conducted, are planned, or are being planned by, or for, GM and were not reported in the PE04-004 IR response. For each such action, provide the following information:
- Action title or identifier;
 - The actual or planned start date;
 - The actual or expected end date;
 - Brief summary of the subject and objective of the action;
 - Engineering group(s)/supplier(s) responsible for designing and for conducting the action; and
 - A brief summary of the findings and/or conclusions resulting from the action.

For each action identified, provide copies of all documents related to the action, regardless of whether the documents are in interim, draft, or final form. Organize the documents chronologically by action.

The February 23, 2004 GM response to PE04-004 contains responsive information regarding "actions" taken by GM or on GM's behalf, that relate to, or may be related to, the alleged defect in the subject vehicles.

In March 2004, warranty claims data related to hydraulic pump replacement in the subject vehicles was reviewed with the subject vehicle Brand Quality and Program Quality engineers. This warranty claims data and related documentation was provided in the GM response to PE04-004.

In May 2004, GM initiated a Field Performance Evaluation (FPE) investigation related to the subject condition in the subject vehicles. The FPE investigation includes vehicle testing to evaluate the effect of the condition on vehicle performance. GM also intends to contact vehicle owners that have reported a failure of the hydraulic pump.

GM will supplement this response with a summary of the findings and conclusions resulting from the FPE investigation and provide copies of all documents related to the "actions" to evaluate the effect of the condition on vehicle performance. Attachment 8 contains a timeline identifying the action, planned start date, expected end date, a brief summary of the objective of the action and responsibility for conducting the action.

9. Describe all modifications or changes made by, or on behalf of, GM in the design, material composition, manufacture, quality control, supply, or installation of the subject component, from the start of production to date, which relate to, or may relate to, the alleged defect in the subject vehicles. For each such modification or change that was not reported in the IR response to PE04-004, provide the following information:
- The date or approximate date on which the modification or change was incorporated into vehicle production;
 - A detailed description of the modification or change;
 - The reason(s) for the modification or change;
 - The part numbers (service and engineering) of the original component;

- e. The part number (service and engineering) of the modified component;
- f. Whether the original unmodified component was withdrawn from production and/or sale, and if so, when;
- g. When the modified component was made available as a service component;
- h. Whether the modified component can be interchanged with earlier production components; and
- i. The number of subject vehicles built with the change.

Also, provide the above information for any modification or change that GM is aware of which may be incorporated into vehicle production within the next 120 days.

The information regarding modifications or changes made by, or on behalf of, GM in the subject component was provided in the GM response to PE04-004 dated February 23, 2004. GM is not aware of any modifications or changes that have been incorporated, or may be incorporated into vehicle production within the next 120 days that we did not identify in our response to PE04-004.

10. Please provide a complete technical description of the accumulator used on the subject vehicles. Include information relative to the performance of the accumulator. If multiple accumulators have been used, repeat for each version and indicate which accumulators were used on which models and model years.

The Hydro-Boost[®] transition system is designed to provide a transition from power assisted brake applications to non-power assisted brake applications in the event that the hydraulic power source is interrupted. The Hydro-Boost[®] reserve system is similar to the transition system except energy is stored at higher levels. The reserve system is designed to work with the vehicle brake system to provide a sufficient power assisted brake application to allow the vehicle to meet FMVSS 105/135 requirements in the event that the hydraulic power source is interrupted.

Both the transition and reserve systems consist of an accumulator, a check valve, a relief valve, a dump valve and an actuator. The accumulator uses nitrogen gas permanently stored in a cylinder with a movable piston. The accumulator is charged through the check valve by power steering fluid under pressure from the hydraulic pump and is retained by the check valve when the charging pressure is reduced. Power steering fluid pressure is generated by brake application and/or steering inputs. The relief valve controls the fluid pressure in the accumulator to prevent over pressurization. The dump valve is opened by the actuator to allow the stored pressurized fluid into the boost cavity providing power assisted brake applications.

The subject vehicles utilize three different size accumulators with various characteristics listed in Attachment 10. Accumulator size is dependent on capability required to perform varying system functions that are matched with specific vehicle requirements.

The number of available power assisted brake applications is dependent upon the force, stroke and duration. If the brake pedal is applied during an interruption to the hydraulic power supply, fluid will transfer from the accumulator to the boost cavity. As fluid is displaced from the accumulator, the gas pressure is reduced; therefore, the available pressure is inversely proportional to the booster output stroke. It also follows that the available pressure is reduced with multiple brake applications until the accumulator is depleted. By design there is clearance between the booster spool valve and the housing bore which allows a small amount of internal

leakage that contributes to the accumulator depletion when the brakes are applied during an interruption to the hydraulic power supply.

Additional technical information and specifications regarding the hydro-boost transition/reserve system performance, including hydro-booster and accumulator used in the subject vehicles by model and model year, is contained in Attachment 10 on the CD labeled Response to Q10.

11. State the number of each of the following that GM has sold that may be used in the subject vehicles by component name, part number (both service and engineering/production), model and model year of the vehicle in which it is used and month/year of sale:
- Subject component; and
 - Any kits that have been released, or developed, by GM for use in service repairs to the subject component/assembly.

For each component part number, provide the supplier's name, address, and appropriate point of contact (name, title, and telephone number). Also identify by make, model and model year, any other vehicles of which GM is aware that contain the identical component, whether installed in production or in service, and state the applicable dates of production or service usage.

A summary table of the requested service part information for the subject component is provided on the CD labeled Response to Q11; refer to the Microsoft Excel file. GM does not offer any kits that have been released or developed for use in service repairs specifically related to the subject condition.

These sales numbers represent sales to dealers in the US and Canada. This data has limited analytical value in analyzing the field performance of a motor vehicle component because the records do not contain sufficient information to establish the reason for the part sale. It is not possible from this data to determine the number of these parts that have been installed in the subject vehicles or the number remaining in dealer or replacement part supplier inventory.

This table contains service part numbers, part description, part usage information including other GM vehicles that contain the identical component, part sales figures by month and calendar year and the supplier's name and address, contact name and phone number. The General Motors Service Parts System does not contain a title of a contact person for each component and is therefore unable to provide this information.

12. For each subject vehicle model please provide the following information:
- GVWR
 - Front GAWR
 - Vehicle turning radius
 - Wheel cut
 - Scrub radius
 - Tire selection(s)
 - Steering gear ratio

The information requested in 12a-12g is contained in Attachment 12 on the CD labeled Response to Q12.

13. For each of the 22 vehicles, in which a crash is alleged (see VIN list attached), please provide a complete list of power-train and suspension options installed on the vehicle

when sold to the first retail producer (e.g. 2WD, 4WD, towing package, snowplow package, tire selection, etc). Provide a description of all option packages that details the included components and GM's intended use for each option package.

The CD labeled Response to Q13 contains a Microsoft Excel file for each of the 22 vehicles on the VIN list that was attached to this IR. Each excel file indicates the VIN, model, model year and 2 wheel or 4 wheel drive in the header. The powertrain and suspension option codes, option description, option details and intended use including tire selection are also indicated in the file.

14. 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 alleged defect in "peer subject vehicles" of MY 1995-1999:
- Consumer complaints, including those from fleet operators;
 - Reports involving a crash, injury, or fatality, based on claims against the manufacturer involving a death or injury, notices received by the manufacturer alleging or proving that a death or injury was caused by a possible defect in a subject vehicle, property damage claims, consumer complaints, or field reports;
 - Warranty claims; extended warranty claims; claims for good will services that were provided; field, zone, or similar adjustments and reimbursements; and warranty claims or repairs made in accordance with a procedure specified in a technical service bulletin or customer satisfaction campaign

For subparts "a" through "c," state the total number of each item 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 warranty claim involving the same incident in which a crash occurred are to be counted as a crash report, a warranty claim and a consumer complaint).

Provide the table in Microsoft Access 2000, or a compatible format, entitled "PEER DATA." See Enclosure 1, Data Collection Disc, for a pre-formatted table which provides further details regarding this submission.

Table 14-1 below summarizes records that could relate to the subject condition.

TYPE OF REPORT	COUNT (INCLUDING DUPLICATES)	GM REPORTS	LOCATION OF REPORTS (ATTACHMENT)	NUMBER WITH PROPERTY DAMAGE	NUMBER WITH CRASH	NUMBER WITH INJURIES/FATALITIES*
Owner Reports	158	156	14A	1	2	0
Field Reports & Technical Assistance System Reports	8	8	14B	0	4	1
Total (Including Duplicates)	164	164	N/A	1	6	1
Total (Excluding Duplicates)	163	163	N/A	1	6	1

TABLE 14-1: REPORT BREAKDOWN

N/A Not Applicable

* GM is not aware of any fatalities related to the subject condition.

The sources of the requested information and the last date the searches were conducted are tabulated in Table 14-2 below.

SOURCE SYSTEM	LAST DATE GATHERED
Corporate Central File	6/17/2004
Customer Assistance Center	7/13/2004
Technical Assistance Center	6/16/2004
Field Information Network Database (FIND)	6/23/2004
Company Vehicle Evaluation Program (CVEP/CTF)	6/15/2004
Early Quality Feedback (EQF)	6/14/2004
Field Product Report Database (FPRD)	6/23/2004

Table 14-2: Data Sources

The 15,085 regular warranty claims and 3,981 extended warranty claims for the 1995 - 1999 MY "peer vehicles" that may be responsive to this request, are summarized by model and model year in Tables 14-3 and 14-4.

Regular Warranty Claims for Power Steering Pump Replace (Labor Code E9050)

MODEL	1995M	1996MY	1997MY	1998MY	1999M	TOTAL
Chevrolet Avalanche	0	0	0	0	0	0
Chevrolet Silverado/Fleetside	712	1016	2184	1058	2264	7234
Chevrolet Suburban	147	103	130	44	286	720
Chevrolet Express	361	177	1049	344	1019	2950
GMC Sierra	198	322	722	396	742	2380
GMC Yukon XL	66	94	66	23	138	367
GMC Savana	150	132	362	184	586	1414
TOTAL	1634	1844	4513	2049	5045	15,085

TABLE 14-3

Extended Warranty Claims for Power Steering Pump Replace (Labor Code E9050)

MODEL	1995	1996MY	1997MY	1998MY	1999M	TOTAL
Chevrolet Avalanche	0	0	0	0	0	0
Chevrolet Silverado/Fleetside	298	329	417	362	392	1798
Chevrolet Suburban	107	75	87	30	90	369
Chevrolet Van/Express	157	55	181	156	221	770
GMC Sierra	86	106	126	111	92	521
GMC Suburban/Yukon XL	54	82	28	18	44	226
GMC Savana	59	20	87	58	73	297
TOTAL	761	667	908	735	912	3981

TABLE 14-4

GM searched the GM North America Claim Adjustment Retrieval Database (CARD-regular warranty), the Motors Insurance Corporation (MIC - extended warranty), and the Universal Warranty Corporation (UWC - extended warranty) databases to collect the warranty data for this response. The warranty data was last gathered on June 14, 2004. A summary of the warranty claims in Tables 14-3 and 14-4 is provided on the CD labeled Response to Q14.

GM's warranty database does not contain the vehicle owner's name or telephone number. Some of the replacement part numbers; part descriptions and customer concern code descriptions are not included in the GM warranty database. GM is providing a field labeled "Verbatim Text" in response to request 5K (dealer/technician comment). The verbatim text is an optional field in the GM warranty system for the dealer to enter any additional comments that may be applicable to the warranty claim. The verbatim text field required to be completed for every warranty claim.

The MIC extended warranty system does not contain the following information: repairing dealer code, vehicle owner information, trouble code, trouble code description, part number, part description or verbatim. The UWC extended warranty system does not use the GM labor code or labor code description and it does not contain the repairing dealer code, trouble code or trouble code description.

The warranty data provided has limited analytical value in analyzing the field performance of a motor vehicle component. The warranty records do not contain sufficient information to establish the condition of the part at the time of the warranty correction; and service personnel may not consistently use the appropriate labor and trouble codes. Warranty numbers represent claims by our dealers for reimbursement for parts and labor costs incurred in performing warranty service for our customers.

15. Provide copies of any marketing research, assessments, studies, and other similar efforts that GM has undertaken, or that have been taken on GM's behalf, that relate to the demographics of the subject vehicles' owners, whether anticipated, projected, or actual. Please include any such efforts conducted by GM or on its behalf that examined the physical characteristics of drivers and anticipated vehicle usage, such as for passenger, cargo, and trailer-hauling related duties.

GM maintains a proprietary Consumer Research Buyer Behavior Database. The information contained in the Buyer Behavior Database covers the entire market. The names of GM purchasers come from Internal GM files and competitive names are purchased from RL Polk. Automotive Research surveys are sent out to a random sample of retail purchasers/lessees two months after they take delivery of a vehicle. The survey is not limited to purchasers of a subject vehicle or a GM truck. Attachment 15A on the CD labeled Response to Q15 contains a copy of the Automotive Research survey.

The Consumer Research Buyer Behavior database was searched for buyer responses to the following sections of the Automotive Research survey (Attachment 15A);

Section F Vehicle Usage.

Section H Reasons for Purchase/lease

Section J Rating Satisfaction with Your New Vehicle

Ability to carry small items

Ability to carry large items/cargo

Braking performance - normal conditions

Braking performance - emergency, bad weather/road conditions

Ability to tow a trailer

4WD/AWD performance

Section K Evaluating Your New Vehicle Experience

Handling on curves
Brake pedal feel

Section L Background Information

What was your intended usage of this vehicle
Are you Male or Female
Are you the person who drives the new vehicle the most
Your marital status
Your age
Number of people in the household
Your highest level of education
Are you employed
If employed, which one best describes your current occupation

The results of the search are contained in the confidential files in the folder named Attachment 15B on the CD labeled Response to Q15. The title of each file identifies the applicable section/question of the Automotive Research survey that relates to the response.

18. Furnish GM's assessment of the alleged defect in the subject vehicle, including:

- a. The causal or contributory factor(s);
- b. The failure mechanism(s);
- c. The failure mode(s);
- d. The risk to motor vehicle safety that it poses;
- e. What warnings, if any, the operator and the other persons both inside and outside the vehicle would have that the alleged defect was occurring or subject component was malfunctioning; and
- f. The crash reports included with this inquiry.

Information responsive to this item is contained in the GM response to PE04-004 dated February 23, 2004. GM will supplement this response after the data and information resulting from the FPE investigation and "actions" identified in Attachment 8.

* * *

General Motors requests that the documents stamped "GM Confidential" included in Attachment 15B be afforded confidential treatment by the NHTSA. This information is not customarily made public by General Motors and contains trade secrets and commercial information which is privileged or confidential under 5 U.S.C. Section 552(b)(4), 49 CFR Part 512 and 49 U.S.C. Section 30167(a).

General Motors treats the above material as confidential proprietary information available only to authorized General Motors personnel and not otherwise available to the public. The documents are maintained under a record-keeping system which is intended to control dissemination of this material within General Motors, and to assure that it is not disseminated outside the Corporation, except as described in the attached certification made pursuant to 49 CFR Part 512.4(e).

To the best of our knowledge, no prior determinations of the confidentiality of these documents has been made by the NHTSA, other Federal Agencies, or the Federal Courts. Document such as the one contained in Attachment 15B, however, have, to the best of our knowledge, normally been granted confidential treatment by the NHTSA in the past.

The document subject to this request for confidentiality has been clearly stamped "GM CONFIDENTIAL". If a request for disclosure of any or all of this information is received by the NHTSA, General Motors requests notification of receipt of each such request and, if necessary, an opportunity to further explain the reasons why such material is trade secret and commercial information which should not be disclosed under the applicable statutes and regulations.

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 Corporation (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 of its divisions, subsidiaries (whether or not incorporated) and affiliated enterprises and all of their 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, in or after January 1, 1996, were involved in any way with any of the following related to the alleged 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,



Gay P. Kent
Director

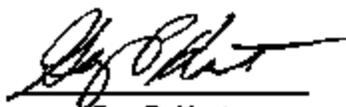
Product Investigations

Attachments

CERTIFICATE IN SUPPORT OF REQUEST FOR CONFIDENTIALITY

I, Gay P. Kent, pursuant to the provisions of 49 CFR Part 512 state as follows:

- (1) I am the Director of Product Investigations, and I am authorized by General Motors Corporation (GM) to execute documents on its behalf;
- (2) The information stamped "GM Confidential" contained in Attachment 15B to this document is confidential and proprietary data and is being submitted with the claim that it is entitled to confidential treatment of 5 USC §552(b)(4), 49 U.S.C. Section 30167(e) and implemented in 49 CFR Part 512;
- (3) I, or members of my staff, have personally inquired of the responsible GM personnel who have authority in the normal course of business to release the information for which a claim of confidentiality has been made to ascertain whether such information has ever been released outside GM;
- (4) Based upon such inquiries to the best of my knowledge, information and belief, the information for which GM has claimed confidential treatment has never been released or become available outside GM, except as hereinafter specified: None.
- (5) I make no representations beyond those contained in this certificate and in particular, I make no representations as to whether this information may become available outside GM because of unauthorized or inadvertent disclosure except as stated in Paragraph 4; and,
- (6) I certify under penalty of perjury that the foregoing is true and correct. Executed on this the 23rd day of July 2004.



Gay P. Kent
Director
Product Investigations



U.S. Department
of Transportation
**National Highway
Traffic Safety
Administration**

Em-651A

400 Seventh Street, S.W.
Washington, D.C. 20590

JUN 7 2004

Mark Jansen
Original NHTSA
Y002 ON CD
Received 6-14-04
NVS-214ns
EA04-012

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Gay P. Kent, Director
Product Investigations
General Motors Corporation
Mail Code 480-106-304
30500 Mound Road
Warren, MI 48090-9055

Dear Ms. Kent:

As you are aware, on April 30, 2004 the Office of Defects Investigation (ODI) of the National Highway Traffic Safety Administration (NHTSA) upgraded PE04-004 to an Engineering Analysis (EA04-012) to further investigate allegations of hydraulic pump failures resulting in a loss of power assist for steering and/or braking in MY 2000-2004 Chevrolet and GMC 2500 and 3500 series trucks.

This office has received an additional 11 reports since opening PE04-004. Copies of each of the 11 new reports are enclosed for your information.

Unless otherwise stated in the text, the following definitions apply to these information requests:

- **Subject vehicles:** All MY 2000-2004 Chevrolet and GMC 2500 and 3500 series trucks manufactured for sale or lease in the United States equipped with a hydro-boost system. Please note that ODI has expanded this definition to include MY 2003 and 2004, but limited it to hydro-boost equipped vehicles.
- **Subject component(s):** All versions of the hydraulic pump used to provide power assist to the braking and steering systems installed on the subject vehicles
- **Peer subject vehicles:** All MY 1995-1999 Chevrolet and GMC 2500 and 3500 series trucks manufactured for sale or lease in the United States equipped with hydro-boost.
- **GM:** General Motors Corporation, all of its past and present officers and employees, whether assigned to its principal offices or any of its field or other locations, including all of its divisions, subsidiaries (whether or not incorporated) and affiliated enterprises and all of their headquarters, regional, zone and other offices and their employees, and all agents, contractors, consultants, attorneys and law firms and other persons engaged



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888-DASH-2-DOT
888-327-4236

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, in or after January 1, 1998, were involved in any way with any of the following related to the alleged 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.

- **Alleged defect:** Any failure, malfunction or otherwise unsatisfactory performance of the hydraulic pump, resulting in a reduction or loss of power assist to the steering and/or braking system.
- **Crash:** Any event, regardless of dollar amount, in which a physical impact involving a subject vehicle causes personal injury, personal or public property damage, or results in destruction of roadway or utility property and arises from an allegation of loss of control of a subject vehicle.
- **Document:** "Document(s)" is used in the broadest sense of the word and shall mean all original written, printed, typed, recorded, or graphic matter whatsoever, however produced or reproduced, of every kind, nature, and description, and all non-identical copies of both sides thereof, including, but not limited to, papers, letters, memoranda, correspondence, communications, electronic mail (e-mail) messages (existing in hard copy and/or in electronic storage), faxes, mailgrams, telegrams, cables, telex messages, notes, annotations, working papers, drafts, minutes, records, audio and video recordings, data, databases, other information bases, summaries, charts, tables, graphics, other visual displays, photographs, statements, interviews, opinions, reports, newspaper articles, studies, analyses, evaluations, interpretations, contracts, agreements, jottings, agendas, bulletins, notices, announcements, instructions, blueprints, drawings, as-builts, changes, manuals, publications, work schedules, journals, statistical data, desk, portable and computer calendars, appointment books, diaries, travel reports, lists, tabulations, computer printouts, data processing program libraries, data processing inputs and outputs, microfilms, microfiches, statements for services, resolutions, financial statements, governmental records, business records, personnel records, work orders, pleadings, discovery in any form, affidavits, motions, responses to discovery, all transcripts, administrative filings and all mechanical, magnetic, photographic and electronic records or recordings of any kind, including any storage media associated with computers, including, but not limited to, information on hard drives, floppy disks, backup tapes, and zip drives, electronic communications, including but not limited to, the Internet and shall include any drafts or revisions pertaining to any of the foregoing, all other things similar to any of the foregoing, however denominated by GM, any other data compilations from which information can be obtained, translated if necessary, into a usable form and any

other documents. For purposes of this request, any document which contains any note, comment, addition, deletion, insertion, annotation, or otherwise comprises a non-identical copy of another document shall be treated as a separate document subject to production. In all cases where original and any non-identical copies are not available, "document(s)" also means any identical copies of the original and all non-identical copies thereof. Any document, record, graph, chart, film or photograph originally produced in color must be provided in color. Furnish all documents whether verified by the manufacturer or not. If a document is not in the English language, provide both the original document and an English translation of the document.

- **Other Terms:** To the extent that they are used in these information requests, the terms "claim," "consumer complaint," "dealer field report," "field report," "fire," "fleet," "good will," "make," "model," "model year," "notice," "property damage," "property damage claim," "rollover," "type," "warranty," "warranty adjustment," and "warranty claim," whether used in singular or in plural form, have the same meaning as found in 49 CFR 579.4.

In order for my staff to continue its evaluation of the alleged defect, additional information is required. Pursuant to 49 U.S.C. § 30166, please provide numbered responses to the following information requests. Insofar as GM has previously provided a document to ODI, GM may produce it again or identify the document, the document submission to ODI in which it was included and the precise location in that submission where the document is located. When documents are produced, the documents shall be produced in an identified, organized manner that corresponds with the organization of this information request letter (including all individual requests and subparts). When documents are produced and the documents would not, standing alone, be self-explanatory, the production of documents shall be supplemented and accompanied by explanation.

Please repeat the applicable request verbatim above each response. After GM's response to each request, identify the source of the information and indicate the last date the information was gathered.

1. Separately state, by model and model year, the number of subject vehicles that 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. Make;
 - c. Model;
 - d. Model Year;
 - e. Date of manufacture;
 - f. Date warranty coverage commenced.

Provide the table in Microsoft Access 2000, or a compatible format, entitled "PRODUCTION DATA." See Enclosure 1, Data Collection Disc, for a pre-formatted table which provides further details regarding this submission.

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 alleged defect in the subject vehicles:
 - a. Consumer complaints, including those from fleet operators;
 - b. Field reports, including dealer field reports;
 - c. Reports involving a crash, injury, or fatality, based on claims against the manufacturer involving a death or injury, notices received by the manufacturer alleging or proving that a death or injury was caused by a possible defect in a subject vehicle, property damage claims, consumer complaints, or field reports;
 - 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 "f," 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 and 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.

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. Vehicle owner or fleet name (and fleet contact person), address, and telephone number;
 - d. Vehicle's VIN;
 - e. Vehicle's make, model and model year;
 - f. Vehicle's mileage at time of incident;
 - g. Incident date;
 - h. Report or claim date;
 - i. Whether a crash is alleged;
 - j. Whether property damage is alleged;
 - k. Number of alleged injuries, if any; and
 - l. Number of alleged fatalities, if any.

Provide this information in Microsoft Access 2000, or a compatible format, entitled "REQUEST NUMBER TWO DATA." See Enclosure 1, Data Collection Disc, for a pre-formatted table which provides further details regarding this submission.

4. Produce copies of all documents related to each item within the scope of Request No. 2. Organize the documents separately by category (i.e., consumer complaints, field reports, etc.) and describe the method GM used for organizing the documents.
5. State, by model and model year, a total count for all of the following categories of claims, collectively, that have been paid by GM to date that relate to, or may relate to, the alleged defect in the subject vehicles: warranty claims; extended warranty claims; claims for good will services that were provided; field, zone, or similar adjustments and reimbursements; and warranty claims or repairs made in accordance with a procedure specified in a technical service bulletin or customer satisfaction campaign.

Separately, for each such claim, state the following information:

- a. GM's claim number;
- b. Vehicle owner or fleet name (and fleet contact person) and telephone number;
- c. VIN;
- d. Repair date;
- e. Vehicle mileage at time of repair;
- f. Repairing dealer's or facility's name, telephone number, city and state or ZIP code;
- g. Labor operation number;
- h. Problem code;
- i. Replacement part number(s) and description(s);
- j. Concern stated by customer; and
- k. Comment, if any, by dealer/technician relating to claim and/or repair.

Provide this information in Microsoft Access 2000, or a compatible format, entitled "WARRANTY DATA." See Enclosure 1, Data Collection Disc, for a pre-formatted table which provides further details regarding this submission.

6. Describe in detail the search criteria used by GM to identify the claims identified in response to Request No. 5, including the labor operations, problem codes, part numbers and any other pertinent parameters used. Provide a list of all labor operations, labor operation descriptions, problem codes, and problem code descriptions applicable to the alleged defect in the subject vehicles. State, by make and model year, the terms of the new vehicle warranty coverage offered by GM on the subject vehicles (i.e., the number of months and mileage for which coverage is provided and the vehicle systems that are covered). Describe any extended warranty coverage option(s) related to the alleged defect that GM offered for the subject vehicles and state by option, model, and model year, the number of vehicles that are covered under each such extended warranty.
7. Produce copies of all service, warranty, and other documents that relate to, or may relate to, the alleged defect in the subject vehicles, that GM has issued to any dealers, regional or zone offices, field offices, fleet purchasers, or other entities. This includes, but is not limited to, bulletins, advisories, informational documents, training documents, or other documents or communications, with the exception of standard shop manuals. Also include the latest draft copy of any communication that GM's short name is planning to issue within the next 120 days.

8. Describe all assessments, analyses, tests, test results, studies, surveys, simulations, returned warranty part inspections, investigations, inquiries and/or evaluations (collectively, "actions") that relate to, or may relate to, the alleged defect in the subject vehicles that have been conducted, are being conducted, are planned, or are being planned by, or for, GM and were not reported in the PE04-004 IR response. For each such action, provide the following information:
- Action title or identifier;
 - The actual or planned start date;
 - The actual or expected end date;
 - Brief summary of the subject and objective of the action;
 - Engineering group(s)/supplier(s) responsible for designing and for conducting the action; and
 - A brief summary of the findings and/or conclusions resulting from the action.

For each action identified, provide copies of all documents related to the action, regardless of whether the documents are in interim, draft, or final form. Organize the documents chronologically by action.

9. Describe all modifications or changes made by, or on behalf of, GM in the design, material composition, manufacture, quality control, supply, or installation of the subject component, from the start of production to date, which relate to, or may relate to, the alleged defect in the subject vehicles. For each such modification or change that was not reported in the IR response to PE04-004, provide the following information:
- The date or approximate date on which the modification or change was incorporated into vehicle production;
 - A detailed description of the modification or change;
 - The reason(s) for the modification or change;
 - The part numbers (service and engineering) of the original component;
 - The part number (service and engineering) of the modified component;
 - Whether the original unmodified component was withdrawn from production and/or sale, and if so, when;
 - When the modified component was made available as a service component;
 - Whether the modified component can be interchanged with earlier production components; and
 - The number of subject vehicles built with the change.

Also, provide the above information for any modification or change that GM is aware of which may be incorporated into vehicle production within the next 120 days.

10. Please provide a complete technical description of the accumulator used on the subject vehicles. Include information relative to the performance of the accumulator. If multiple accumulators have been used, repeat for each version and indicate which accumulators were used on which models and model years.
11. State the number of each of the following that GM has sold that may be used in the subject vehicles by component name, part number (both service and engineering/production), model and model year of the vehicle in which it is used and month/year of sale:
 - a. Subject component; and
 - b. Any kits that have been released, or developed, by GM for use in service repairs to the subject component/assembly.

For each component part number, provide the supplier's name, address, and appropriate point of contact (name, title, and telephone number). Also identify by make, model and model year, any other vehicles of which GM is aware that contain the identical component, whether installed in production or in service, and state the applicable dates of production or service usage.

12. For each subject vehicle model please provide the following information:
 - a. GVWR
 - b. Front GAWR
 - c. Vehicle turning radius
 - d. Wheel cut
 - e. Scrub radius
 - f. Tire selection(s)
 - g. Steering gear ratio
13. For each of the 22 vehicles, in which a crash is alleged (see VIN list attached), please provide a complete list of power-train and suspension options installed on the vehicle when sold to the first retail producer (e.g. 2WD, 4WD, towing package, snowplow package, tire selection, etc). Provide a description of all option packages that details the included components and GM's intended use for each option package.
14. 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 alleged defect in "peer subject vehicles" of MY 1995-1999:
 - a. Consumer complaints, including those from fleet operators;
 - b. Reports involving a crash, injury, or fatality, based on claims against the manufacturer involving a death or injury, notices received by the manufacturer alleging or proving that a death or injury was caused by a possible defect in a subject vehicle, property damage claims, consumer complaints, or field reports;
 - c. Warranty claims; extended warranty claims; claims for good will services that were provided; field, zone, or similar adjustments and reimbursements; and warranty claims or repairs made in accordance with a procedure specified in a technical service bulletin or customer satisfaction campaign

For subparts "a" through "c," state the total number of each item 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 warranty claim involving the same incident in which a crash occurred are to be counted as a crash report, a warranty claim and a consumer complaint).

Provide the table in Microsoft Access 2000, or a compatible format, entitled "PEER DATA." See Enclosure 1, Data Collection Disc, for a pre-formatted table which provides further details regarding this submission.

15. Provide copies of any marketing research, assessments, studies, and other similar efforts that GM has undertaken, or that have been taken on GM's behalf, that relate to the demographics of the subject vehicles' owners, whether anticipated, projected, or actual. Please include any such efforts conducted by GM or on its behalf that examined the physical characteristics of drivers and anticipated vehicle usage, such as for passenger, cargo, and trailer-hauling related duties.
16. Furnish GM's assessment of the alleged defect in the subject vehicle, including:
 - a. The causal or contributory factor(s);
 - b. The failure mechanism(s);
 - c. The failure mode(s);
 - d. The risk to motor vehicle safety that it poses;
 - e. What warnings, if any, the operator and the other persons both inside and outside the vehicle would have that the alleged defect was occurring or subject component was malfunctioning; and
 - f. The crash reports included with this inquiry.

This letter is being sent to GM pursuant to 49 U.S.C. § 30166, which authorizes NHTSA to conduct any investigation that may be necessary to enforce Chapter 301 of Title 49 and to request reports and the production of things. It constitutes a new request for information. GM's failure to respond promptly and fully to this letter could subject GM to civil penalties pursuant to 49 U.S.C. § 30165 or lead to an action for injunctive relief pursuant to 49 U.S.C. § 30163. (Other remedies and sanctions are available as well.) Please note that maximum civil penalties under 49 U.S.C. § 30165 have increased as a result of the recent enactment of the Transportation Recall Enhancement, Accountability, and Documentation (TREAD) Act, Public Law No. 106-414 (signed November 1, 2000). Section 5(a) of the TREAD Act, codified at 49 U.S.C. § 30165(b), provides for civil penalties of up to \$5,000 per day, with a maximum of \$15 million for a related series of violations, for failing or refusing to perform an act required under 49 U.S.C. § 30166. This includes failing to respond to ODI information requests.

If GM cannot respond to any specific request or subpart(s) thereof, please state the reason why it is unable to do so. If on the basis of attorney-client, attorney work product, or other privilege, GM does not submit one or more requested documents or items of information in response to this information request, GM must provide a privilege log identifying each document or item withheld, and stating the date, subject or title, the name and position of the person(s) from, and the person(s) to whom it was sent, and the name and position of any other recipient (to include

all carbon copies or blind carbon copies), the nature of that information or material, and the basis for the claim of privilege and why that privilege applies.

GM's response to this letter, in duplicate, together with a copy of any confidentiality request, must be submitted to this office by July 12, 2004. Please refer to EA04-012 in GM's response to this letter. If GM finds that it is unable to provide all of the information requested within the time allotted, GM must request an extension from me at (202) 366-4933 no later than five business days before the response due date. If GM is unable to provide all of the information requested by the original deadline, it must submit a partial response by the original deadline with whatever information GM then has available, even if an extension has been granted.

If GM claims that any of the information or documents provided in response to this information request constitute confidential commercial material within the meaning of 5 U.S.C. § 552(b)(4), or are protected from disclosure pursuant to 18 U.S.C. § 1905, GM must submit supporting information together with the materials that are the subject of the confidentiality request, in accordance with 49 CFR Part 512, to the Office of Chief Counsel (NCC-113), National Highway Traffic Safety Administration, Room 5219, 400 Seventh Street, S.W., Washington, D.C. 20590. GM is required to submit two copies of the documents containing allegedly confidential information (except only one copy of blueprints) and one copy of the documents from which information claimed to be confidential has been deleted.

If you have any technical questions concerning this matter, please call Nate Seymour of my staff at (202) 366-6965.

Sincerely,



Kathleen DeMeter, Director
Office of Defects Investigation

Enclosure 1, one CD ROM titled Data Collection Disc containing four files, copies of 12 VOQ's in Adobe pdf format and list of crash vehicles

12 VOQs (10063757, 10060670, 10058691, 10057757, 10057046, 10056310, 10055619, 10055433, 10055427, 10053178, 10066906)



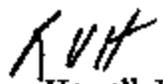
Memorandum

U.S. Department
of Transportation

National Highway
Traffic Safety
Administration

Submittal to the Public File
ODI Investigation EA04-012

Date: July 23, 2004

From: 
Rosa Howell, Investigation Case Assistant
Office of Defects Investigation/NSA-10

Reply to: EA04-012

To: Kevin Ball
Technical Information Service/NAD-50

Please forward the attachment to George Washington University's NHTSA/FHWA National
Crash Analysis Center for Public access under EA04-012.

ONE CD

GM 7/23/2004 QUESTION 1, 3, 5, 7, 8, 10, 11, 12,
13, 14, APPENDIX B AND CON RED

INME-EA04012-19211P

Attachment(s)

#

GM651A
EA04-012

ATTACHMENT "Q1"

**GM651A
EA04-012**

ATTACHMENT "Q3"

**GM651A
EA04-012**

ATTACHMENT "Q5"

**GM651A
EA04-012**

ATTACHMENT "Q7"

**GM651A
EA04-012**

ATTACHMENT "Q8"

**GM651A
EA04-012**

ATTACHMENT "Q10"

**GM651A
EA04-012**

ATTACHMENT "Q11"

**GM651A
EA04-012**

ATTACHMENT "Q12"

GM651A
EA04-012

ATTACHMENT "Q13"

**GM651A
EA04-012**

ATTACHMENT "Q14"

**GM651A
EA04-012**

ATTACHMENT "Q15"

**"GM CONFIDENTIAL" MATERIAL
HAS BEEN REMOVED FROM THIS
ATTACHMENT AND SUPPLIED TO
THE OFFICE OF THE CHIEF
COUNSEL.**