

February 17, 2005

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

RECEIVED
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OFFICE OF DEFECTS
INVESTIGATION

GM-672

NVS-213gm
EA04-025

Dear Ms. DeMeter:

General Motors (GM) is providing information in response to your Information Request (IR), dated January 5, 2005, related to your comparative study (EA04-025) of false park conditions on certain 2003 - 2004 Model Year (MY) Dodge Ram, 2500 and 3500 (¾ and 1 ton) series pick-up trucks equipped with an automatic transmission.

As requested, GM has included information regarding the 2003 - 2004 MY GMC Sierra and Chevrolet Silverado, 2500/3500 (¾ and 1 ton) series pickup trucks equipped with automatic transmissions manufactured for sale or lease in the United States, that may exhibit inadvertent movement (powered or un-powered) while parked.

Your questions and our corresponding replies are as follows:

1. State, 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;
 - c. Transmission model;
 - d. Two wheel or four wheel drive;
 - e. Transmission shift location (floor or steering column);
 - f. PRNDL indicator style (electronic or mechanical);
 - g. Date of manufacture;
 - h. Date warranty coverage commenced; and
 - i. The zip code in the United States where the vehicle was originally sold or leased (or delivered for sale or lease).

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	2003 MY	2004 MY
Chevrolet Silverado	211,881	248,553
GMC Sierra	63,333	79,437
TOTAL	275,194	328,990

TABLE 1 VEHICLE PRODUCTION
VEHICLE PRODUCTION DATED JANUARY 25, 2005

The production information requested in 1a-1i is provided on the in the Attachment 1 CD, in the folder labeled: "Response to Q1;" refer to the Microsoft Access 2000 file labeled EA04-025 GM PICKUPS PRODUCTION DATA. GM is providing the state where the vehicle was shipped in response to request 1i. 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 alleged defect in the subject vehicles:
- Consumer complaints, including those from fleet operators;
 - Field reports, including dealer field reports;
 - 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;
 - Property damage claims; and
 - Third-party arbitration proceedings where GM is or was a party to the arbitration; and lawsuits, both pending and closed, in which GM is or was a defendant or codefendant.

For subparts "a" through "e", 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 "e", 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 d and e, 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.

Table 2-1 below summarizes records that could relate to the subject condition. GM has organized the records by the GM file number within each attachment.

TYPE OF REPORT	COUNT (INCLUDING DUPLICATES)	GM REPORTS	LOCATION OF REPORTS (ATTACHMENT)	CRASHES	NUMBER OF PROPERTY DAMAGE	NUMBER OF REPORTED INJURIES*
Owner Reports	3	3	2A	1	0	0
Field Reports and Technical Assistance System Reports	17	17	2B	8	2	1
Not-in-Suit Claims	1	1	2C	1	1	0
Subrogation Claims	-	-	-	-	-	-
Third Party Arbitration Proceedings	-	-	-	-	-	-
Product Liability Lawsuits	-	-	-	-	-	-
Total (Including Duplicates)	21	21	-	10	3	1
Total (Excluding Duplicates)	20	20	-	9	2	1

TABLE 2-1: REPORT BREAKDOWN 2003 - 2004 MY CHEVROLET SILVERADO AND GMC SIERRA

* GM IS NOT AWARE OF ANY FATALITIES REPORTED TO THE SUBJECT CONDITION

To date, GM's investigation of the alleged condition has not included an assessment of the cause(s) of each incident responsive to Request No. 2. Some incident reports may not contain sufficient reliable information to accurately assess cause. Assessments of other incidents (from lawsuits and claims) may be attorney work product and/or privileged. Therefore, information and documents

provided in this response, if any, consist only of non-attorney work product and/or non-privileged material for incidents that have been investigated and assessed.

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	1/24/2005
Customer Assistance Center	1/31/2005
Technical Assistance Center	2/2/2005
Company Vehicle Evaluation Program (CVEP)	1/20/2005
Corporate Test Fleet (CTF)	1/20/2005
Early Quality Feedback (EQF)	2/4/2005
Legal / Employee Self Insured Services (ESIS)	1/27/2005

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. Where an item was struck, identify the item;
 - l. Number of alleged injuries, if any; and
 - m. Number of alleged fatalities, if any.

The requested information is provided on the In the Attachment 1 CD, in a folder labeled Response to Q3; refer to the Microsoft Access 2000 file in the folder labeled: "EA04-025 GM PICKUPS REQUEST NUMBER TWO DATA."

4. Produce copies of all documents related to each of items "c" through "e" within the scope of Request No. 2. Organize the documents separately by category (i.e., crash/injury/fatality reports, property damage claims, 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. 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.

The regular warranty claims for the subject vehicles that may be responsive to this request are summarized in Tables 5A and 5B below. A summary of these warranty reports is provided in the Attachment 1 CD; refer to the folder labeled: "Response for Q5, EA04-025 GM PICKUPS WARRANTY DATA."

Regular Warranty Claims for Peer Review EA04-025

MODEL	2003 MY	2004 MY	TOTAL
Chevrolet Silverado	40	16	56
GMC Sierra	9	9	18
TOTAL	49	25	74

TABLE 5A

Extended Warranty Claims for Peer Review EA02-025

MODEL	2003 MY	2004 MY	TOTAL
Chevrolet Silverado	1	0	1
GMC Sierra	0	0	0
TOTAL	1	0	1

TABLE 5B

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 January 27, 2005.

A summary of warranty claims that may relate to the subject condition is provided on the CD in the Attachment 1, in the folder labeled: "Response to Q5;" refer to the Microsoft Access 2000 file labeled: "REQUEST NUMBER FIVE - EA04-025 GM PICKUPS WARRANTY DATA"

GM's warranty database does not contain the following information: vehicle owner's name or telephone number, replacement part number description, or customer concern statement. 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. GM does not require the verbatim text field to be completed for every warranty claim.

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 in Microsoft Access 2003, or a compatible format. 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).

The regular warranty data from the GM CARD Database was collected by searching the labor codes listed in table 6-1. Table 6-2 lists the trouble codes associated with the warranty data.

LABOR CODE	DESCRIPTION:
K8397	Parking Gear R&R or Replace
K8501	Shaft, Manual - Replace
K8502	Lever, Detent - Replace
K8503	Rod, Park Actuator Replace
K8540	Pawl, Shaft, Rod or Spring, Parking - Replace
K8545	Detent Spring and Roller Assy - Replace
K7024	Shaft Assy, Manual Detent Lever - Replace
K7383	Bend, Rear R&R or replace
K7549	Guide and Seal, Pawl Lock Actuator - Replace
K7841	Actuator Assembly, Park Lock - Replace

TABLE 6-1 LABOR CODES USED IN WARRANTY SEARCH

TROUBLE CODE	DESCRIPTION
1A	BENT
1B	CASTING DEFECT
1D	BROKEN
1E	BURNED
1H	CLOGGED/RESTRICTED/BLOCKED
2C	GLAZED
2E	CLEARANCE-EXCESSIVE
2H	IMPROPERLY INSTALLED
2L	INCORRECT PRESSURE
2T	INCORRECT TORQUE
2W	LOOSE
3A	MISADJUSTED/MISALIGNED
3L	OUT OF CALIBRATION
3P	POOR RELEASE
4A	SCORED
4X	WORN
6C	COMPONENT-INOPERATIVE
6D	COMPONENT-INTERMITTENT
6G	COMPONENT-SHORTED

TABLE 6-2 TROUBLE CODES USED IN WARRANTY SEARCH

Warranty claims using the above labor and problem codes that include verbatim describing noises from the transmission, shift problems while moving or other shift problems not related to the subject condition, have been excluded.

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 Motor's 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 is planning to issue within the next 120 days.

GM has not found any past service or warranty documents that relate the alleged condition that have been issued to dealers, regional or zone offices, field offices, fleet purchasers or other entities.

GM is not aware of documents or communications to dealers regarding the subject condition that may be incorporated into vehicle production within the next 120 days.

The data collection was completed on February 5, 2005. The preceding information was collected from GM Service Operations.

8. Identify, describe, and provide copies of all engineering standards, design guidelines, and specifications that relate in any way to the potential for the vehicle operator to achieve a shift position between Reverse and Park in the gear selector assemblies of the automatic transmissions used in the subject peer vehicles. This should include a short description and photograph of the contour of the "rooster comb" manual detent lever in these transmissions.

In addition to the descriptions below, GM is providing photos and diagrams of the steering column and transmission system components for the subject vehicles in the Attachment 1 CD, Response for Q8 folder.

Two automatic transmissions are available in the 2003 - 2004 MY Chevrolet Silverado and GMC Sierra, 2500/3500 series trucks. The 4L80-E series (RPO MT1) transmission is a four-speed, rear wheel drive, electronically controlled, automatic overdrive transmission with a torque converter clutch. The 1000 series (RPO M74) transmission is a five-speed, rear wheel drive, electronically controlled, automatic overdrive transmission with torque converter clutch.

The "Park to Reverse" and "Reverse to Park" operation of both transmissions is essentially the same, with the exception of the detent lever (Rooster Comb) profile. Profile differences of the detent levers affect the manual shaft rotation versus transmission gear position as shown in the shift sequence charts provided in the Attachment 1 CD, Response to Question 10 folder.

The automatic transmission shift system of the subject vehicles includes the following components: steering column shift lever, ignition interlock solenoid, Brake Transmission Shift Interlock (BTSI) solenoid, an illuminated PRNDL gear position indicator, shift cable, transmission shift lever, and Neutral Start Back-up switch (NSBU) as shown in Figures 8-1, 8-2, 8-3, 8-4 and 8-5.

The "Park" engagement operation in the subject vehicles is as follows:

The column mounted shift lever controls the Park, Reverse, Neutral, D4, D3, D2, and D1 gear positions of the automatic transmission. The driver changes the transmission gear by pulling and rotating the shift lever that rotates the column mounted shift mechanism (Figure 8-1 and 8-2). The shift mechanism actuates the shift cable and moves the transmission shift lever that rotates the manual shaft and detent lever on the transmission. Park engagement occurs when the transmission detent roller (part of the detent spring) is located in the park valley of the detent lever. If the detent roller is not in the park valley when Park is selected, spring force from the detent spring will force the detent roller back in the park valley of the detent lever (Figures 8-6, 8-7, 8-8, and 8-9). With the detent roller in the park valley, the vehicle is locked in Park, by the park pawl engaging the park gear (which is part of the output shaft), via the actuator rod. The park pawl engagement mechanically locks the output shaft to the transmission case (Figures 8-10, 8-11 and 8-12). When a gear other than Park is selected, the park pawl disengages the park gear allowing the output shaft to rotate (See Figures 8-13, 8-14 and 8-15).

The illuminated PRNDL display on the dash highlights the current transmission gear state from two sources. Park position is indicated when both the NSBU switch indicates Park position and the secondary park gate switch is actuated (See Figure 8-3, 8-4 and 8-5). The secondary park gate switch is actuated when the shift lever pawl is in the park gate.

In addition to the features above, GM incorporates the following features to ensure the proper transmission gear is selected and/or displayed:

The shift cable assembly includes an inline cable adjuster to align the column mounted shift mechanism gates and the transmission detents.

- The steering column mounted shift mechanism includes a cam linkage to increase driver leverage between Park and Reverse positions.
- A pawl on the end of the shift lever interacts with "gates" on the column shift mechanism to prevent inadvertent lever movement without first pulling the shift lever.
- During normal operating conditions, the column mounted shift mechanism includes a Brake Transmission Shift Interlock (BTSI) solenoid that prevents shift lever rotation unless the brake pedal is depressed when the ignition is in the "Run" position (see Figure 8-3).
- As required by the Federal Motor Vehicle Safety Standard (FMVSS 114), there is a mechanical (cable) link to the ignition switch that prevents the shift mechanism from being removed from the park gate unless the ignition is in the "Accessory" or "Run" positions. This linkage also prevents rotation of the ignition switch to the "Lock" position (where the key can be removed), unless the shift mechanism is in the park gate.
- GM has developed an application manual for the 4L80-E Series transmission that utilizes GM's "Best Practices", when utilizing the unit in new products. The "System Performance, Section 3", of the application manual is included in the Attachment 1 CD, Response to Question 8.

In summary, GM believes that the above design criteria and safety mechanisms minimize the potential for the vehicle operator to achieve a shift position between Reverse and Park.

8. Supply a photograph of each different shifter and PRNDL indicator arrangement used in the subject vehicles.

GM uses a common column mounted shift lever and illuminated PRNDL display for the 2003 - 2004 MY, Chevrolet Silverado and GMC Sierra, 2500/3500 series vehicles. The photos are included in the Attachment 1 CD, Response to Q8 folder.

10. Provide a Park-Reverse and a Reverse-Park shift sequence chart identifying the status of significant components within the subject vehicles' transmission shift systems based on either manual shaft rotational displacement (steering column-mounted shifters) or shift handle linear displacement (console or floor-mounted shifters). The chart should identify the status of the PRNDL readout, engagement/disengagement of the Park and Reverse gates, park pawl position, and the energizing/de-energizing of any related hydraulic circuits. Representative diagrams are found in Enclosure 1.

GM is providing Park - Reverse and Reverse - Park shift sequence charts for the 2003 - 2004 MY, Chevrolet Silverado and GMC Sierra, 2500/3500 series vehicles. The requested charts are included in the Attachment 1 CD, Response to Q10 folder.

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, 2000, 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 F. Kent
Director

Product Investigations



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

JAN - 5 2005

GM-672

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

*Gay Dowd
Kim Desautell
Brian Hantz*

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Ms. Gay Kent, Director
Product Investigations
General Motors Corporation
Mail Code 480-111-E18
30200 Mound Road
Warren, MI 48090-9010

NVS-213gem
EA04-025

*Original w/CD
Received 1-12-05*

Dear Ms. Kent:

The Office of Defects Investigation (ODI) of the National Highway Traffic Safety Administration (NHTSA) is conducting an Engineering Analysis (EA04-025) of False Park conditions in certain Model Year (MY) 2003-2004 Dodge 2500/3500 Ram ¾- and 1- ton pickup trucks equipped with automatic transmissions. Consumer complaints collected during the course of this investigation allege that subject vehicles which have been apparently shifted into Park with the engine running may inadvertently shift into Reverse, leading to a powered rollaway. In many cases, the rollaway occurs after the vehicle operator exits the vehicle. ODI is requesting related peer vehicle information from General Motors Corporation to support a comparative study of the subject Dodge ¾- and 1- ton pickup trucks.

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

- **Subject vehicles:** all MY 2003-2004 Sierra and Silverado 2500/3500 pickup trucks equipped with automatic transmissions manufactured for sale or lease in the United States.
- **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 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, 2000, were involved in any way with any of the following related to the alleged defect in the subject vehicles:



DOT AUTO SAFETY HOTLINE
888-DASH-2-DOT
888-327-4226

- 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:** Inadvertent movement, either powered or un-powered, of the vehicle, either attended or unattended, while parked. This includes incidents in which drivers claim that the gearshift lever and/or gearshift (PRNDL) indicator was in Park, regardless of whether or not the transmission parking pawl was fully engaged.
 - **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 GM 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 evaluate the alleged defect, 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. State, 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;
 - c. Transmission model;
 - d. Two wheel or four wheel drive;
 - e. Transmission shift location (floor or steering column);
 - f. PRNDL indicator style (electronic or mechanical);
 - g. Date of manufacture;
 - h. Date warranty coverage commenced; and
 - i. The zip code in the United States where the vehicle was originally sold or leased (or delivered for sale or lease).

Provide this information in Microsoft Access 2003, or a compatible format, entitled "EA04-025 GM PICKUPS PRODUCTION DATA." See Enclosure 1, EA04-025 Data Collection Disc, for pre-formatted tables that provide 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; and
- e. Third-party arbitration proceedings where GM is or was a party to the arbitration; and lawsuits, both pending and closed, in which GM is or was a defendant or codefendant.

For subparts "a" through "e", 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 "e", 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 d and e, 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. Where an item was struck, identify the item;
 - l. Number of alleged injuries, if any; and
 - m. Number of alleged fatalities, if any.

Provide this information in Microsoft Access 2003, or a compatible format, entitled "EA04-025 GM PICKUPS REQUEST NUMBER TWO DATA." See Enclosure 1, EA04-025 Data Collection Disc, for a pre-formatted table that provides further details regarding this submission.

4. Produce copies of all documents related to each of items "c" through "e" within the scope of Request No. 2. Organize the documents separately by category (i.e., crash/injury/fatality reports, property damage claims, 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 2003, or a compatible format, entitled "EA04-025 GM PICKUPS WARRANTY DATA." See Enclosure 1, EA04-025 Data Collection Disc, for a pre-formatted table that 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 in Microsoft Access 2003, or a compatible format. 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).
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 is planning to issue within the next 120 days.
8. Identify, describe, and provide copies of all engineering standards, design guidelines, and specifications that relate in any way to the potential for the vehicle operator to achieve a shift position between Reverse and Park in the gear selector assemblies of the automatic transmissions used in the subject peer vehicles. This should include a short description and photograph of the contour of the "rooster comb" manual detent lever in these transmissions.

9. Supply a photograph of each different shifter and PRNDL indicator arrangement used in the subject vehicles.
10. Provide a Park-Reverse and a Reverse-Park shift sequence chart identifying the status of significant components within the subject vehicles' transmission shift systems based on either manual shaft rotational displacement (steering column-mounted shifters) or shift handle linear displacement (console or floor-mounted shifters). The chart should identify the status of the PRNDL readout, engagement/disengagement of the Park and Reverse gates, park pawl position, and the energizing/de-energizing of any related hydraulic circuits. Representative diagrams are found in Enclosure 1.

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 February 22, 2005. Please refer to EA04-025 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 Mr. Jeff Quandt at (202) 366-5207 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, as amended (68 Fed. Reg. 44209 et seq; July 28, 2003), 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. We request, but do not require, that GM provide a Bates stamp number or other means of identification for each document in its confidential submission.

If you have any technical questions concerning this matter, please call Mr. Greg Magno of my staff at (202) 366-0139.

Sincerely,

A handwritten signature in black ink, appearing to read 'Kathleen C. DeMeter', with a long horizontal flourish extending to the right.

Kathleen C. DeMeter, Office Director
Office of Defects Investigation

Enclosure 1, One CD ROM titled Data Collection Disc containing four files

GM672
EA04-025

ATTACHMENT "1"