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RECEIVED
NVS 214

September 1, 2005

2005 SEP -6 P 12:16

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

OFFICE OF DEFECTS
INVESTIGATION

GM-680

NVS-214bby
EA05-005 (PEER)

Dear Ms. DeMeter:

This letter is General Motors' (GM) response to your information request (IR), dated July 14, 2005, requesting peer vehicle information for model year (MY) 1995 through 2002 Chevrolet C/K 1500 series vehicles, concerning an ongoing NHTSA investigation of under hood fires, resulting from a short circuit in the Speed Control Deactivation Switch in MY 1995 through 2002 Ford F-150, Ford Expedition, and Lincoln Navigator vehicles.

As agreed to in discussions between GM and NHTSA's ODI investigator Bruce York on July 22, 2005, GM is limiting the scope of this response to non-crash, "key off," related engine compartment fires that may relate to an electrical concern or be of an unknown nature.

GM does not believe the cruise control systems used by the subject GM peer vehicles are susceptible to fire, based on their design, development, validation and field performance.

Your questions and our corresponding replies are as follows:

1. State, by model and model year the number of subject peer vehicles General Motors has manufactured for sale or lease in the United States. Separately, identify by model and model year how many of the vehicles were built with and without cruise control.

Provide the information for this request in a Microsoft Excel 2000 format (or a compatible format). Entitle the table "Peer Request Number 1 Data". See Enclosure 1, Data Collection Disk, for a pre-formatted table that provides further details regarding this submission.

GM is providing a summary of the number of subject peer vehicles, both with and without cruise control, produced for sale or lease in the United States by model and model year in Tables 1A and 1B below.

PRODUCTION DATA - VEHICLES MANUFACTURED WITH CRUISE CONTROL

MODEL	MY 1995	MY 1996	MY 1997	MY 1998	MY 1999	MY 2000	MY 2001	MY 2002	TOTAL
Silverado	331,501	292,883	349,726	351,828	389,757	480,182	381,636	378,471	2,953,984
Tahoe	82,127	99,158	112,933	71,948	220,218	98,108	193,918	208,534	1,085,938
Burbank	78,000	65,587	81,011	45,130	188,380	77,355	145,357	140,184	828,904
Avalanche	0	0	0	0	0	0	0	122,350	122,350
Total	491,628	457,628	543,670	468,906	808,353	656,645	720,909	848,519	4,891,258

TABLE 1A

PRODUCTION DATA - VEHICLES MANUFACTURED WITHOUT CRUISE CONTROL

MODEL	MY 1995	MY 1996	MY 1997	MY 1998	MY 1999	MY 2000	MY 2001	MY 2002	TOTAL
Silverado	54,008	28,878	30,828	32,574	34,585	71,535	60,085	63,856	378,045
Tahoe	305	123	761	139	1,112	78	415	692	3,625
Suburban	593	379	392	209	1,193	114	219	196	3,295
Avalanche	0	0	0	0	0	0	0	0	0
Total	54,904	29,378	31,681	32,922	36,890	71,727	60,719	64,744	382,965

TABLE 1B

As requested, GM is also providing the requested production counts in Microsoft Excel format in Attachment 1 CD GM, folder labeled "Response for Q1;" refer to the file named "GM Peer Request Number 1 Data."

2. State, by model and model year, the number of each of the following, received by General Motors, or of which General Motors is otherwise aware, which relate to, or may relate to, the subject condition in the subject peer vehicles:
 - a. Consumer complaints, including those from fleet operators;
 - b. Field reports, including dealer field reports;
 - c. Reports involving 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 the subject condition in a subject peer vehicle, property damage claims, consumer complaints, or field reports;
 - d. Third-party arbitration proceedings where General Motors is or was a party to the arbitration; and,
 - e. Lawsuits, both pending and closed, in which General Motors 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.) that occurred on vehicles built with cruise control and without cruise control separately. Also, identify how many of the items occurred while the ignition was in the off, on, and unknown ignition position and how many of the incidents resulted in damage to a structure. 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 fire occurred are to be counted as a fire report, a field report and a consumer complaint).

Provide the information for this request in a Microsoft Excel 2000 format (or a compatible format). Entitle the table "Peer Request Number 2 Data". See Enclosure 1, Data Collection Disk, for a pre-formatted table that provides further details regarding this submission.

Table 2A below summarizes the total number of reports GM has received for the subject peer vehicles that allege a non-crash engine compartment fire of an electrical or unknown nature where the ignition switch was in the "key off" position.

**REPORT BREAKDOWN: ALLEGED FIRES – IGNITION "KEY OFF"
 (WITH CRUISE / WITHOUT CRUISE)**

TYPE OF REPORT	GM REPORTS	SUBCATEGORIES	
		NUMBER WITH PROPERTY DAMAGE	NUMBER WITH INJURIES OR FATALITIES
Owner Reports	33 / 2	7 / 0	0 / 0
Field Reports and Technical Assistance System Reports	0 / 0	0 / 0	0 / 0
Not-In-Suit Claims	1 / 0	1 / 0	0 / 0
Subrogation Claims	13 / 0	7 / 0	0 / 0
Third Party Arbitration Proceedings	0 / 0	0 / 0	0 / 0
Product Liability Lawsuits	4 / 0	1 / 0	0 / 0
Total (Including Duplicates)	51 / 2	16 / 0	0 / 0
Total (Excluding Duplicates)	46 / 2	13 / 0	0 / 0

TABLE 2A

GM is aware of an additional 19 unique reports of fire for subject peer vehicles equipped with cruise control where the ignition key position is unknown. Two of these 19 reports allege property damage. GM is also aware of 2 additional unique reports of fire for subject peer vehicles that were not equipped with cruise control where the ignition key position is unknown. Neither of these reports alleges property damage. None of the additional 21 reports alleges an injury or fatality.

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

DATA SOURCES

SOURCE SYSTEM	LAST DATE GATHERED
Corporate Central File	08/03/2005
Customer Assistance Center (CAC)	08/08/2005
Technical Assistance Center (TAC)	08/17/2005
Field Information Network Database (FINN)	08/02/2005
Problem Resolution Tracking System (PRTS)	08/08/2005
Company Vehicle Evaluation Program (CVEP)	08/05/2005
Captured Test Fleet (CTF)	08/05/2005
Early Quality Feedback (EQF)	08/06/2005
Field Product Report Database (FPRD)	08/02/2005
Legal / Employee Self Insured Services (ESIS) / Product Liability Claims and Lawsuits	08/03/2005

TABLE 2B

As requested, GM is also providing the requested report information by model year in Microsoft Excel format in Attachment 1 CD GM, folder labeled "Response for Q2;" refer to the file named "GM Peer Request Number 2 Data."

3. State, by model and model year, a total count for all of the following categories of claims, collectively, that have been paid by General Motors to date that relate to, or may relate to, the subject condition in the subject peer 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, state the total number of claims that occurred on vehicles built with cruise control and without cruise control. Also, within each of these categories, identify how many of the claims occurred while the ignition was in the off, on, or unknown ignition position and how many of the incidents resulted in damage to a structure.

Provide the information for this request in a Microsoft Excel 2000 format (or a compatible format). Entitle the table "Peer Request Number 3 Data". See Enclosure 1, Data Collection Disk, for a pre-formatted table that provides further details regarding this submission.

GM has searched for any claims associated with the cruise control system that may relate to the subject condition for the subject peer vehicles and has provided them in the requested format in Attachment 1 CD GM, folder labeled "Response for Q3;" refer to the file named "Peer Request Number 3 Data."

Tables 3A and 3B below summarize the total number of regular warranty claims that may relate to the subject condition for vehicles produced both with and without cruise control. These claims were identified in the manner described in GM's response to question 4. Due to the limited information that is available for these claims, GM is unable to ascertain whether or not any of these claims occurred while the ignition was in the off position or resulted in damage to an adjacent structure. Furthermore, GM believes that the warranty information provided here cannot be used to determine any trend related to the subject condition.

REGULAR WARRANTY DATA - VEHICLES PRODUCED WITH CRUISE CONTROL

MODEL	MY 1995	MY 1996	MY 1997	MY 1998	MY 1999	MY 2000	MY 2001	MY 2002	TOTAL
Silverado	100	75	54	50	32	18	29	14	372
Tahoe	19	27	20	5	21	7	9	10	118
Suburban	15	11	18	6	24	4	3	3	84
Avalanche	N/A	8	8						
Total	134	113	92	61	77	29	41	35	582

TABLE 3A

(N/A) The Avalanche model was new for MY 2002

REGULAR WARRANTY DATA – VEHICLES PRODUCED WITHOUT CRUISE CONTROL

MODEL	MY 1995	MY 1996	MY 1997	MY 1998	MY 1999	MY 2000	MY 2001	MY 2002	TOTAL
Silverado	11	4	5	2	2	2	1	9	36
Tahoe	0	0	0	0	1	0	0	0	1
Suburban	1	0	0	0	0	0	0	0	1
Avalanche	N/A	0	0						
Total	12	4	5	2	3	2	1	9	36

TABLE 3B

(N/A) The Avalanche model was new for MY 2002

GM is also providing a summary of the extended warranty claims associated with the cruise control system for the subject peer vehicles and has provided them in the requested format in Attachment 1CD GM, folder labeled "Response for Q3;" refer to the file named "GM Peer Request Number 3 Data." Detail on the search for these claims is provided in GM's response to question 4. Trouble code information for the extended warranty claims is not available; therefore GM is unable to determine which of these claims may relate to the subject condition.

4. Describe in detail the search criteria used by General Motors to identify the claims identified in response to Request No. 3, 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 subject condition in the subject peer vehicles. State, by make and model year, the terms of the new vehicle warranty coverage offered by General Motors on the subject peer 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 subject condition that General Motors offered for the subject peer vehicles and state by option, model, and model year, the number of vehicles that are covered under each such extended warranty.

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 for claims associated with the cruise control system components that may relate to the subject condition. The regular and extended warranty data was last gathered on August 8, 2005.

A list of the labor codes used in this search for regular warranty and MIC extended warranty is provided below in Table 4A.

LABOR CODES USED FOR REGULAR / MIC WARRANTY CLAIMS SEARCH

LABOR CODE	DESCRIPTION
H4000	ASR/TRACT CTRL, CRUISE RELAY-REPLAC
N2857	RELAY, CRUISE CONTROL - REPLACE
N8161	WIRE/CONN, CRVSHAFT SENSOR-REPAIR
N6170	WIRE/CONN, CRUISE CONTROL-REPAIR
N6616	WIRE/CONN,CRUISE CONTROL-REPAIR
R1120	TRANSDUCER ASSEMBLY, CRUISE CTL-ADJ
R1170	MOTOR, CRUISE CONTROL STEPPER-REPL
R1190	SERVO ASSEMBLY, CRUISE CONTROL-REPL
R1220	CONTROLLER, CRUISE CONTROL-REPLACE
R1225	PUMP, CRUISE CNTRL VACUUM-R&R/REPL
R1240	SWITCH,CRUISE REL BRAKE-R&R/REPLACE
R1245	SWITCH, CRUISE REL CLUTCH-R&R/REPL
R1260	SWITCH, CRUISE ENGAGEMENT-REPLACE
R1280	SWITCH,CRUISE DASH (ON-OFF)-REPLACE
R1345	VALVE ASSEMBLY, CRUISE VAC REL-REPL
R1360	VALVE, CRUISE CONTROL-CHECK
N2365	SWITCH - MULTIFUNCTION (INSTRUMENT PANEL) - REPLACE
N2360	SWITCH CLUTCH START - REPLACE
N2440	SWITCH STOP LAMP - REPLACE
H2494	SWITCH PRESSURE (ABS) REPLACE

TABLE 4A

The UWC extended warranty system does not use the GM labor code or labor code description. Table 4a provides a list of the loss codes and part descriptions that were used in the search for UWC extended warranty claims.

LOSS CODES USED FOR UWC EXTENDED WARRANTY CLAIMS SEARCH

LOSS CODE	PART DESCRIPTION
0596	BB -Misc. Bumper to Bumper Components
0760	T/S Switch
1215	Cruise Control Engagement Switch
1220	Cruise Control Module
1225	Cruise Control Servo
1298	BB -Misc. Bumper to Bumper Components

TABLE 4B

Many of the warranty claims that resulted from the search on labor codes do not relate to the subject condition. GM has reviewed the trouble codes assigned to each of the regular warranty claims and has identified those trouble codes that may relate to the subject condition. Accordingly, GM is providing only those regular warranty claims associated with those trouble codes that may relate to the subject condition in response to question 3. Table 4C provides a list of those trouble codes that may relate to the subject condition.

TRUBLE CODES THAT MAY RELATE TO SUBJECT CONDITION

TRUBLE CODE	DESCRIPTION
1E	BURNED
7G	WIRE - BURNED - EXTERNAL HEAT
7H	WIRE - BURNED - INTERNAL HEAT

TABLE 4C

Neither the MIC extended warranty nor the UWC extended warranty systems contain trouble code or trouble code description information, so GM is unable to perform any additional filtering of the extended warranty claims to determine which extended warranty claims may relate to the subject condition. GM is providing a summary of all extended warranty claims that were found in its search in response to question 3.

All models and model years of the subject vehicles are covered by a bumper-to-bumper new vehicle warranty for three years or 36,000 miles, whichever occurs first. In addition, many different extended warranty options are available through GM dealerships. They are offered at different prices and for varying lengths of time, based on the 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.

5. Produce copies of all service, warranty, and other documents that relate to, or may relate to, the subject condition in the subject peer vehicles, that General Motors 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 manufacturer's short name is planning to issue within the next 120 days.

GM has not issued any service, warranty, or other documents to the field that relate to, or may relate to, the subject condition in the subject peer vehicles. Furthermore, at this time there are no bulletins planned for release within the next 120 days. A search for this information was completed on August 1, 2005.

6. Provide copies of any Technical Service Bulletins, Customer Satisfaction Campaigns, or Recall Campaigns related to engine compartment fires on the subject peer vehicles.

GM has neither released, nor plans to release, any Technical Service Bulletins that may relate to the subject condition for the subject peer vehicles. GM completed its search for this information on August 1, 2005.

GM has neither conducted, nor plans to conduct, any Customer Satisfaction Campaigns or Safety Recalls that relate to the subject condition for the subject peer vehicles. GM searched for Customer Satisfaction Campaigns and Safety Recalls associated with the Powertrain, Chassis, and Electronic Controls & Software partition areas on July 21, 2005 and completed its review of those campaigns on August 26, 2005.

* * *

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 General Motors (including all business units and persons previously referred to), who are or, in or after 1985, were involved in any way with any of the following related to the subject condition in the subject peer 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

Enclosure: One CD ROM titled "Attachment 1 CD GM"



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

Original Received 7-20-05

JUL 14 2005

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

Encl-680

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Gay Kent, Director
Product Investigations
General Motors Corporation
MAIL CODE 480-111-E15
30200 Mound Road
Warren, MI 48090-9055

NVS-214bby
EA05-005

Dear Ms. Kent:

The Office of Defects Investigation (ODI) is conducting an investigation (EA05-005) of under hood fires resulting from a short circuit in the Speed Control Deactivation Switch (SCDS) in model year (MY) 1995 through 2002 Ford 150, Ford Expedition, and Lincoln Navigator vehicles (excluding vehicles included in Recall 05V-017) manufactured by Ford Motor Company. These fires can occur while the vehicle is parked with the key out of the ignition. As part of our analysis, we are conducting a comparative assessment of other similar vehicles. Therefore, we are requesting information concerning certain General Motors vehicles (peer vehicles).

- **Subject Peer Vehicles:** All MY 1995 through 2002 Chevrolet C/K 1500 vehicles manufactured for sale or lease in the United States.
- **General Motors:** General Motors Corporation, and 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 General Motors (including all business units and persons previously referred to), who are or, in or after 1995, were involved in any way with any of the following related to the subject condition in the subject peer 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



DOT AUTO SAFETY HOTLINE
888-DASH-2-DOT
888-327-4236

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.

- **Subject Condition:** Non-Crash, "key off", related engine compartment fire.
- **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 General Motors, 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 evaluate the subject condition in certain Ford F150, Ford Expedition, and Lincoln Navigator vehicles, we are requesting information pertaining to certain General Motors vehicles Pursuant to 49 U.S.C. § 30166, please provide numbered responses to the following information requests. Insofar as General Motors has previously provided a document to ODI, General Motors 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 General Motors' response to each request, identify the source of the information and indicate the last date the information was gathered. If requested information is unavailable, so state and provide a brief explanation. Along with your written response, please provide this information in Microsoft Word 2000, or a compatible format, entitled "IR Response".

1. State, by model and model year the number of subject peer vehicles General Motors has manufactured for sale or lease in the United States. Separately, identify by model and model year how many of the vehicles were built with and without cruise control.

Provide the information for this request in a Microsoft Excel 2000 format (or a compatible format). Entitle the table "Peer Request Number 1 Data". See Enclosure 1, Data Collection Disk, for a pre-formatted table that provides further details regarding this submission.

2. State, by model and model year, the number of each of the following, received by General Motors, or of which General Motors is otherwise aware, which relate to, or may relate to, the subject condition in the subject peer vehicles:
 - a. Consumer complaints, including those from fleet operators;
 - b. Field reports, including dealer field reports;
 - c. Reports involving 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 the subject condition in a subject peer vehicle, property damage claims, consumer complaints, or field reports;
 - d. Third-party arbitration proceedings where General Motors is or was a party to the arbitration; and,
 - e. Lawsuits, both pending and closed, in which General Motors 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.) that occurred on vehicles built with cruise control and without cruise control separately. Also, identify how many of the items occurred while the ignition was in the off, on, and unknown ignition position and how many of the incidents resulted in damage

to a structure. 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 fire occurred are to be counted as a fire report, a field report and a consumer complaint).

Provide the information for this request in a Microsoft Excel 2000 format (or a compatible format). Entitle the table "Peer Request Number 2 Data". See Enclosure 1, Data Collection Disk, for a pre-formatted table that provides further details regarding this submission.

3. State, by model and model year, a total count for all of the following categories of claims, collectively, that have been paid by General Motors to date that relate to, or may relate to, the subject condition in the subject peer 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, state the total number of claims that occurred on vehicles built with cruise control and without cruise control. Also, within each of these categories, identify how many of the claims occurred while the ignition was in the off, on, or unknown ignition position and how many of the incidents resulted in damage to a structure.

Provide the information for this request in a Microsoft Excel 2000 format (or a compatible format). Entitle the table "Peer Request Number 3 Data". See Enclosure 1, Data Collection Disk, for a pre-formatted table that provides further details regarding this submission.

4. Describe in detail the search criteria used by General Motors to identify the claims identified in response to Request No. 3, 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 subject condition in the subject peer vehicles. State, by make and model year, the terms of the new vehicle warranty coverage offered by General Motors on the subject peer 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 subject condition that General Motors offered for the subject peer vehicles and state by option, model, and model year, the number of vehicles that are covered under each such extended warranty.
5. Produce copies of all service, warranty, and other documents that relate to, or may relate to, the subject condition in the subject peer vehicles, that General Motors 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 manufacturer's short name is planning to issue within the next 120 days.

6. Provide copies of any Technical Service Bulletins, Customer Satisfaction Campaigns, or Recall Campaigns related to engine compartment fires on the subject peer vehicles.

This letter is being sent to General Motors 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. General Motors failure to respond promptly and fully to this letter could subject General Motors 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 General Motors 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 privileges, General Motors does not submit one or more requested documents or items of information in response to this information request, General Motors 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.

General Motors response to this letter, in duplicate, together with a copy of any confidentiality request, must be submitted to this office by September 02, 2005. Please refer to EA05-005 in General Motors response to this letter. If General Motors finds that it is unable to provide all of the information requested within the time allotted, General Motors must request an extension from me at (202) 366-5207 no later than five business days before the response due date. If General Motors 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 General Motors then has available, even if an extension has been granted.

If General Motors 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, General Motors 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. General Motors 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 Bruce York of my staff at (202) 366-6938.

Sincerely,

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

**Kathleen C. DeMeter, Director
Office of Defects Investigation
Enforcement**

Enclosures: One CD ROM titled Data Collection Disc containing three files.