GENERAL MOTORS NORTH AMERICA
Structure & Safety Integration

Rec'd 5/2/07

April 30, 2007

Jeffrey L. Quandt, Chief
Vehicle Control Division
Office of Defects Investigation
NHTSA Enforcement
Room #5326
400 Seventh Street, S.W.
Washington, D.C. 20590

GM-688A

NVS-213dlr
EA06-016

Dear Mr. Quandt:

This letter is General Motors' (GM) response to your request for updated information since its reply on June 29, 2006, regarding alleged engine stall while driving on 2001-2002MY C/K 2500 and 3500 series trucks equipped with 8.1L engines manufactured for sale or lease in the United States.

Your questions and our corresponding replies are as follows:

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**
   f. **Lawsuits, both pending and closed, in which GM is or was a defendant or codefendant.**

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

   In addition, for items "c" through "f", provide a summary description of the alleged problem and causal and contributing factors and GM's assessment of the problem, with a summary of the significant underlying facts and evidence. For items "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.

   Table 2-1 below summarizes records that indicate engine stall while driving as a result of the crankshaft position sensor malfunction. Table 2-2 summarizes records that indicate engine stall without indicating whether the vehicle was in motion at the time of the stall. Table 2-3 summarizes records that indicate the vehicle did not start.

To date, GM's investigation of the alleged defect 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.

Type of Report	GM Reports	Subcategories			
		Corresponding to NHTSA Reports	Number with Property Damage	Number with Crash	Number with Injuries/ Fatalities
Owner Reports	87	1	0	0	0
Field Reports	16	0	0	0	0
Not-In-Suit Claims	0	0	0	0	0
Subrogation Claims	0	0	0	0	0
Third Party Arbitration Proceedings	0	0	0	0	0
Product Liability Lawsuits	0	0	0	0	0
Total Reports (Including Duplicates)	103	1	0	0	0
Total Vehicles with Reports (Unique VIN)	103	1	0	0	0

Table 2-1: Report Classification - Stall while driving

Type of Report	GM Reports	Subcategories			
		Corresponding to NHTSA Reports	Number with Property Damage	Number with Crash	Number with Injuries/ Fatalities
Owner Reports	33	0	0	0	0
Field Reports	52	0	0	0	0
Not-In-Suit Claims	0	0	0	0	0
Subrogation Claims	0	0	0	0	0
Third Party Arbitration Proceedings	0	0	0	0	0
Product Liability Lawsuits	0	0	0	0	0
Total Reports (Including Duplicates)	85	0	0	0	0
Total Vehicles with Reports (Unique VIN)	85	0	0	0	0

Table 2-2: Report Classification - Stalled with Unknown Driving Condition

Type of Report	GM Reports	Subcategories			
		Corresponding to NHTSA Reports	Number with Property Damage	Number with Crash	Number with Injuries/ Fatalities
Owner Reports	8	0	0	0	0
Field Reports	0	0	0	0	0
Not-In-Suit Claims	0	0	0	0	0
Subrogation Claims	0	0	0	0	0
Third Party Arbitration Proceedings	0	0	0	0	0
Product Liability Lawsuits	0	0	0	0	0
Total Reports (Including Duplicates)	8	0	0	0	0
Total Vehicles with Reports (Unique VIN)	8	0	0	0	0

Table 2-3: Report Classification - No Start Condition

Source System	Last Date Gathered
Customer Assistance Center (CAC)	3/20/2007
Technical Assistance Center (TAC)	3/21/2007
Field Information Network Database (FIND)	3/21/2007
Company Vehicle Evaluation Program (CVEP)	3/13/2007
Captured Test Fleet (CTF)	3/13/2007
Early Quality Feedback (EQF)	3/13/2007
Field Product Report Database (FPRD)	3/21/2007
Legal / Employee Self Insured Services (ESIS) / Product Liability Claims and Lawsuits	3/16/2007

Table 2-4 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. Vehicle speed at time of incident;
h. Incident date;
i. Report or claim date;
j. Whether a crash is alleged;
k. Whether property damage is alleged;
l. Number of alleged injuries, if any; and
m. Number of alleged fatalities, if any.

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

GM is providing the requested information for 3a-e in ATT_1_GM Disc, folder labeled: "Q_03;" refer to Microsoft Access file named "Request Number Two Data." The information requested for 3f-m is also provided, where available, in the same Disc.

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 summarized in Tables 2-1, 2-2, and 2-3 are embedded in the file provided in ATT_1_GM Disc; folder labeled: "Q_03;" refer to the Microsoft Access file. 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 that provides further details regarding this submission.

Regular Warranty

The focus of this investigation is engine stall while driving as a result of crankshaft position sensor malfunction. The GM Claim Adjustment Retrieval Database (CARD) regular and the Motors Insurance Corp (MIC) extended warranty databases were searched using the one labor code J4355 crank position sensor replacement.

In Table 5-1, GM lists five regular warranty customer codes within the J4355 labor code that may relate to the alleged defect.

Customer Code	Description
PU	PERFORMANCE: STALLS-HOT ENG
PB	PERFORMANCE: CUTS OUT
PT	PERFORMANCE: STALLCOLD(FAILED EMISSION)
PR	PERFORMANCE: SLUGGISH(STALLS-HOT ENGINE)
PQ	PERFORMANCE: ROUGHIDLE-HOT(STALLCOLD)

Table 5-1 Regular Warranty Customer Codes

GM reviewed each warranty claim comment field where available and has counted claims in Table 5-2 where it was reported that the vehicle stalled while driving as a result of a crank sensor malfunction.

Make/ Model/ Model Year	2001	2002	Total
GMC Yukon XL	0	0	0
GMC Sierra 2500	0	0	0
GMC Sierra 3500	2	2	4
Chevrolet Suburban	0	0	0
Chevrolet Silverado 2500	0	0	0
Chevrolet Silverado 3500	0	0	0
Chevrolet Avalanche	N/A	0	0
Total	2	2	4

Table 5-2 Regular Warranty Claims - Customer indicated Stall While Driving

N/A Not Applicable

In Table 5-3, GM reviewed each warranty claim comment field where available and has identified claims where it was reported that the vehicle stalled or engine quit/ died, however, where there is not information to determine if the engine stalled while driving as a result of a crank sensor malfunction including where the comment field was left blank.

Make/ Model/ Model Year	2001	2002	Total
GMC Yukon XL	0	2	2
GMC Sierra 2500	4	8	12
GMC Sierra 3500	3	1	4
Chevrolet Suburban	5	7	12
Chevrolet Silverado 2500	17	21	38
Chevrolet Silverado 3500	8	3	11
Chevrolet Avalanche	N/A	18	18
Total	37	60	97

Table 5-3 Regular Warranty Claims - Customer indicated Stall with Unknown Driving Condition

N/A Not Applicable

In Table 5-4, GM reviewed each warranty claim comment field where available and has identified no claims where it was reported that the vehicle would not start as a result of a crank sensor malfunction.

MAKE/ MODEL/ MODEL YEAR	2001	2002	TOTAL
GMC YUKON XL	0	0	0
GMC SIERRA 2500	0	0	0
GMC SIERRA 3500	0	0	0
CHEVROLET SUBURBAN	0	0	0
CHEVROLET SILVERADO 2500	0	0	0
CHEVROLET SILVERADO 3500	0	0	0
CHEVROLET AVALANCHE	N/A	0	0
TOTAL	0	0	0

TABLE 5-4 REGULAR WARRANTY CLAIMS - CUSTOMER INDICATED NO START
N/A NOT APPLICABLE

Extended Warranty- Universal Warranty Corp. (UWC)

GM reviewed the UWC extended warranty claim comments and has identified claims in Table 5-5 where it was reported that the vehicle stalled while driving as a result of crankshaft position sensor malfunction. UWC extended warranty database was searched through a process that identifies the applicable vehicle system, parts descriptions, and keywords.

MAKE/ MODEL/ MODEL YEAR	2001	2002	TOTAL
GMC YUKON XL	0	0	0
GMC SIERRA 2500	0	0	0
GMC SIERRA 3500	0	0	0
CHEVROLET SUBURBAN	0	0	0
CHEVROLET SILVERADO 2500	1	0	1
CHEVROLET SILVERADO 3500	0	0	0
CHEVROLET AVALANCHE	N/A	0	0
TOTAL	1	0	1

TABLE 5-5 UWC EXTENDED WARRANTY CLAIMS - STALL WHILE DRIVING
N/A NOT APPLICABLE

In Table 5-6, GM states the number of UWC extended warranty claims where there is not enough information to determine if the engine stalled while driving as a result of a crank sensor malfunction.

MAKE/ MODEL/ MODEL YEAR	2001	2002	TOTAL
GMC YUKON XL	0	0	0
GMC SIERRA 2500	2	1	3
GMC SIERRA 3500	0	0	0
CHEVROLET SUBURBAN	0	0	0
CHEVROLET SILVERADO 2500	2	1	3
CHEVROLET SILVERADO 3500	0	0	0
CHEVROLET AVALANCHE	N/A	1	1
TOTAL	4	3	7

TABLE 5-6 UWC EXTENDED WARRANTY CLAIMS - STALL WITH UNKNOWN DRIVING CONDITION
N/A NOT APPLICABLE

In Table 5-7, GM reviewed each UWC warranty claim comment field and has identified claims where it was reported that the vehicle would not start as a result of crank sensor malfunction.

MAKE/ MODEL/ MODEL YEAR	2001	2002	TOTAL
GMC YUKON XL	0	1	1
GMC SIERRA 2500	0	0	0
GMC SIERRA 3500	0	0	0
CHEVROLET SUBURBAN	0	0	0
CHEVROLET SILVERADO 2500	0	0	0
CHEVROLET SILVERADO 3500	0	0	0
CHEVROLET AVALANCHE	N/A	1	1
TOTAL	0	2	2

TABLE 5-7 UWC WARRANTY CLAIMS - NO START
N/A NOT APPLICABLE

Extended Warranty- Motors Insurance Corp.

In Table 5-8, the MIC extended warranty database was searched using the same labor code used for the regular warranty and GM states the number of unique VIN. Since there are no claim comments, GM is unable to determine the number of claims, if any, where the engine stalled while driving as a result of the crank position sensor malfunction.

MAKE/ MODEL/ MODEL YEAR	2001	2002	TOTAL
GMC YUKON XL	13	19	32
GMC SIERRA 2500	42	32	74
GMC SIERRA 3500	9	3	12
CHEVROLET SUBURBAN	37	20	57
CHEVROLET SILVERADO 2500	68	62	130
CHEVROLET SILVERADO 3500	42	10	52
CHEVROLET AVALANCHE	N/A	44	44
TOTAL	211	190	401

TABLE 5-8 MIC EXTENDED WARRANTY CLAIMS – J4355 CRANK SENSOR
N/A NOT APPLICABLE

The General Motor's warranty system does not contain information on the number of vehicles that have extended warranty coverage. The number of extended warranty coverage contracts on the subject vehicles that have been sold by MIC for the subject vehicles with 8.1L engine regardless of status (in-force, expired, cancelled) as of April 26, 2007 are contained in Table 5-9.

MAKE/ MODEL/ MODEL YEAR	2001	2002	TOTAL
GMC YUKON XL	779	491	1,270
GMC SIERRA 2500	2,434	1,839	4,273
GMC SIERRA 3500	949	318	1,267
CHEVROLET SUBURBAN	2,271	1,046	3,317
CHEVROLET SILVERADO 2500	6,933	4,381	11,314
CHEVROLET SILVERADO 3500	3,198	1,125	4,323
CHEVROLET AVALANCHE	N/A	1,988	1,988
TOTAL	16,564	11,188	27,752

TABLE 5-9: MIC EXTENDED WARRANTY COVERAGE CONTRACTS SOLD BEFORE APRIL 26, 2007
N/A – Not Applicable

A summary of the warranty claims for Tables 5-2 through 5-8 are provided in ATT_1_GM Disc; folder labeled: "Q_05," refer to the "Warranty" and "Extended Warranty" files. There are cases where the dealers used multiple labor codes/claims for the same VIN and incident. For this reason, the number of records provided will be greater than the counts provided in the tables. The information requested in 5i-k may be contained within the regular warranty claim.

The sources of the requested information and the last date the searches were conducted are tabulated in Table 5-10 below.

SOURCE SYSTEM	LAST DATE GATHERED
GM CARD --regular warranty	3/16/2007
Motors Insurance Corporation (MIC) – extended warranty	3/26/2007
Universal Warranty Corporation (UWC)– extended warranty	3/22/2007

TABLE 5-10: DATA SOURCES

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, labor, and other (such as towing and rental car) 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) 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.**

See the Response for question 5 for the search criteria used to identify warranty claims.

The crankshaft position sensor is an emissions related component which is covered by a General Motors Federal Emission Control warranty for five years or 50,000 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 GM warranty system does not contain information on the number of vehicles that have extended warranty coverage.

* * *

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 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 P. Kent
Director
Product Investigations

Attachments

GM688A
EA06-016

ATTACHMENT "1"

GM NON-CONFIDENTIAL MATERIAL