



January 6, 2012

Jeffrey L. Quandt, Chief  
Vehicle Control Division  
Office of Defects Investigation  
National Highway Traffic Safety Administration  
1200 New Jersey Ave, SE, Room W48-307  
Washington, DC 20590

N100097

NVS-213cla  
PE10-010 Supplement 2  
(EA11-001)

Dear Mr. Quandt:

This letter supplements General Motors' (GM) June 18, 2010, response to your Preliminary Evaluation (PE10-010), dated March 30, 2010, regarding allegations of steel brake line corrosion resulting in rupture during brake application, resulting in sudden reduction of brake effectiveness in certain model year (MY) 1999 through 2003 GMT800 C/K series vehicles manufactured by General Motors.

On January 5, 2011, the Office of Defect Investigations (ODI) opened Engineering Analysis EA11-001 for the subject vehicles sold or currently registered in Salt Belt states as identified in the ODI EA11-001 opening resume, to further assess the scope, frequency and safety risks associated with sudden failures of corroded brake pipes that can result in decreased brake effectiveness.

This letter responds to your November 29, 2011, request that GM update our July 29, 2011, Supplement-1 response to items 2 through 5 of PE10-010. The subject vehicles for this supplement 2 response are MY 1999 through 2003 GMT800 C/K series vehicles sold or leased in Salt Belt states.

This response includes only additional reports and claims not previously included in GM's responses sent previously.

Your requests 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. Reports involving a fire, 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 the subject vehicle, property damage claims, consumer complaints, or field reports;
- e. Property damage claims;
- f. Third-party arbitration proceedings where GM is or was a party to the arbitration; and
- g. 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 "g," 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 "f" and "g," 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 the responsive records that may relate to the alleged defect in the subject vehicles. GM has organized the records by the GM file number within each attachment. Refer to access database "Q\_03\_REQUEST NUMBER TWO DATA" for categories prescribed by the NHTSA.

TYPE OF REPORT	GM REPORTS	SUBCATEGORIES				
		CORRESPONDING TO NHTSA REPORTS	NUMBER WITH PROPERTY DAMAGE	NUMBER WITH CRASH	NUMBER WITH INJURIES/FATALITIES*	NUMBER WITH FIRES
Owner Reports	53	16	1	4	0	0
Field Reports	4	0	0	0	0	0
Not-In-Suit Claims	5	3	4	5	0	0
Subrogation Claims	0	0	0	0	0	0
Third Party Arbitration Proceedings	0	0	0	0	0	0
Product Liability Lawsuits	0	0	0	0	0	0
Total Reports (Including Duplicates)	62	19	5	9	0	0
Total Vehicles with Reports (Unique VIN)	59	17	5	7	0	0

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

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

The 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
Customer Assistance Center	12/07/2011
Technical Assistance Center	12/14/2011
Legal/Employee Self Insured Services (ESIS)/Product Liability Claims/Lawsuits	12/12/2011

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:
- GM's file number or other identifier used;
  - The category of the item, as identified in Request No. 2 (i.e., consumer complaint, field report, etc.);
  - Vehicle owner or fleet name (and fleet contact person), address, and telephone number;
  - Vehicle's VIN;
  - Vehicle's make, model and model year;
  - Vehicle's mileage at time of incident;
  - Incident date;
  - Report or claim date;
  - Whether a crash is alleged;
  - Whether a fire is alleged;
  - Whether property damage is alleged;
  - Number of alleged injuries, if any; and
  - Number of alleged fatalities, if any.

Provide this information in Microsoft Access 2003, or a compatible format, entitled "REQUEST NUMBER TWO DATA."

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

4. Produce copies of all documents related to each item within the scope of Request No. 2. 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 Table 2-1 are embedded in the file provided in ATT\_1\_GM disk; folder labeled "Q\_03"; refer to the Microsoft Access file labeled "Q\_03\_REQUEST NUMBER TWO DATA". GM has organized the records by the GM file number within each attachment.

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

- 5. 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;**

**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 "WARRANTY DATA."**

Table 5-1 summarizes the GM regular warranty claims and goodwill warranty claims that may be related to the alleged defect. Table 5-2 summarizes the Motors Insurance Corporation (MIC) and Universal Warranty Corporation (UWC) service contract claims for the subject vehicles that may be related to the alleged defect.

MAKE/MODEL	MODEL YEARS					TOTAL
	1999	2000	2001	2002	2003	
Chevrolet Silverado	0	0	0	4	14	18
Chevrolet Tahoe	N/A	0	0	0	0	0
Chevrolet Suburban	N/A	0	0	0	0	0
Chevrolet Avalanche	N/A	N/A	N/A	1	0	1
GMC Sierra	1	0	0	2	4	7
GMC Yukon	N/A	0	0	0	1	1
GMC Yukon XL	N/A	0	0	0	2	2
Cadillac Escalade	N/A	N/A	N/A	0	0	0
Cadillac Escalade EXT	N/A	N/A	N/A	1	0	1
TOTAL	1	0	0	8	21	30

TABLE 5-1 GM REGULAR WARRANTY AND GOODWILL CLAIMS FOR THE SUBJECT VEHICLES

MAKE/MODEL	MODEL YEARS					TOTAL
	1999	2000	2001	2002	2003	
Chevrolet Silverado	0	0	1	2	1	4
Chevrolet Tahoe	N/A	0	1	1	3	5
Chevrolet Suburban	N/A	0	0	3	0	3
Chevrolet Avalanche	N/A	N/A	N/A	0	0	0
GMC Sierra	0	0	1	0	3	4
GMC Yukon	N/A	0	0	0	1	1
GMC Yukon XL	N/A	0	0	0	1	1
Cadillac Escalade	N/A	N/A	N/A	0	0	0
Cadillac Escalade EXT	N/A	N/A	N/A	0	0	0
TOTAL	0	0	3	6	9	18

TABLE 5-2 MIC AND UWC SERVICE CONTRACT CLAIMS AND  
 MIC GOODWILL CLAIMS FOR THE SUBJECT VEHICLES

The sources of the requested information and the last date the searches were conducted are tabulated in Table 5-3 below.

SOURCE SYSTEM	LAST DATE GATHERED
GART - Regular Warranty	12/06/2011
Motors Insurance Corporation (MIC) - Service Contract Claims	12/06/2011
Universal Warranty Corporation (UWC) - Service Contract Claims	12/05/2011

TABLE 5-3: DATA SOURCES

For this response, GM searched the GM Global Analysis and Reporting Tool (GART-regular warranty), the Motors Insurance Corporation (MIC- service contract claims), and the Universal Warranty Corporation (UWC- service contract claims) databases to collect the warranty and service contract claims data.

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

A summary of the GM warranty and goodwill claims, MIC/UWC service contract claims and MIC goodwill claims for the subject vehicles, including the information requested in 5(a-k), is provided on the Att\_1\_GM disk in the folder labeled "Q\_05"; refer to the Microsoft Access 2000 file labeled, "Q\_05\_WARRANTY DATA".

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

This response is based on searches of General Motors (GM) locations where documents determined to be responsive to your request would ordinarily be found. As a result, the scope of this search did not include, nor could it reasonably include, "all 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, 1994, 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,



M. Carmen Benavides, Director  
Product Investigations and Safety Regulations

Attachments