



September 13, 2013

Scott Yon, Chief  
Vehicle Integrity Division  
Office of Defects Investigation  
National Highway Traffic Safety Administration  
1200 New Jersey Ave, SE, Room W48-314  
Washington, DC 20590

N120261

NVS-212mjl  
RQ13002

Dear Mr. Yon:

This letter supplements General Motors' (GM) response to your Recall Query (RQ13-002), dated June 13, 2013, to investigate the scope of two General Motors recalls relating to a driver air bag connector (shorting bar) defect in some model year (MY) 2012 Chevrolet Camaro, Cruze and Sonic, and Buick Verano vehicles. The 573 letter for NHTSA 12V522 was sent by GM on October 30, 2012 and the 573 letter for 13V023 was sent by GM on January 22, 2013.

General Motors Company (GM) is supplementing its response to include additional information requested by email from Mr. Michael Lee of NHTSA, Office of Defects Investigations, on August 19, 2013. Mr. Lee requested that information as stated in requests 2 – 4 below be provided for allegations of airbag non-deployment under these two conditions:

- i) Reports of asymmetrical deployments (i.e., passenger air bag deployed but driver air bag did not), and
- ii) Reports of driver airbag non-deployments (i.e., only driver airbag is mentioned in the report)

None of the additional reports being provided with this supplemental response indicate an airbag warning light before the crash and none appear to be related to the alleged defect of this Recall Query.

Your request and the additional information in reply 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 conditions i) or ii) as described above in the subject vehicles:**
  - a. **Consumer complaints, including those from fleet operators;**
  - b. **Field reports, including dealer field reports;**



- c. Reports involving a crash, injury, or fatality, based on claims against the manufacturer involving a death or injury, notices received by the manufacturer alleging or proving that a death or injury was caused by a possible defect in a subject vehicle, property damage claims, consumer complaints, or field reports;
- d. Property damage claims;
- e. Third-party arbitration proceedings where GM is or was a party to the arbitration; and
- f. Lawsuits, both pending and closed, in which GM is or was a defendant or codefendant.

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

In addition, for items "c" through "f," provide a summary description of the alleged problem and causal and contributing factors and GM's assessment of the problem, with a summary of the significant underlying facts and evidence. For items "e" and "f," identify the parties to the action, as well as the caption, court, docket number, and date on which the complaint or other document initiating the action was filed.

GM searched for reports which meet the criteria in conditions i and ii above. GM found no reports of asymmetrical deployment as defined in condition i. GM also found no reports which meet the criteria of condition ii, that *only* the driver airbag is mentioned. However, GM found two reports where non-deployment of "airbags" and "driver airbag" are both mentioned in the report. These reports are summarized in Table 2-1 of ATT\_1\_GM disk; folder labeled "Q\_02.

Customers who contact GM to complain that an airbag did not deploy as expected may not specifically mention the "driver" airbag. Therefore, GM has also included additional reports where: (1) the customer complained that the "airbag" or "airbags" did not deploy as they expected, (2) the driver was the only person in the vehicle, and (3) the impact was on the front of the vehicle, or the impact area was unknown. These reports are summarized in Table 2-2, ATT\_1\_GM disk; folder labeled "Q\_02 . For these additional reports included in Table 2-2, GM did not include reports involving only a side impact or only a rear impact, or where there was more than one occupant in the vehicle.

Some of the reports in Table 2-2 included a post-crash inspection of the vehicle. In all cases where the vehicle was inspected, the airbags were found to have operated as designed. For the remaining reports in Table 2-2, the function of the restraint system was not examined. These reports are based only on the unsubstantiated opinion of the customer that the airbag should have deployed in a crash.

It is not unusual for customers to misunderstand that airbags are not designed to inflate in every crash. Frontal airbags are designed to inflate in moderate to severe frontal or near frontal crashes to help reduce the potential for severe injuries, mainly to the driver's or front passenger's head and chest. They are designed to inflate if the impact exceeds a predetermined deployment threshold. Whether the frontal airbags will or should inflate is not based primarily on how fast the vehicle is traveling. It depends on the object struck, the direction of the impact, and the level of deceleration. Frontal airbags are not intended to inflate during rear impacts, or in many side impacts.

Tables 2-1 and 2-2, which are included in the file provided in ATT\_1\_GM disk; folder labeled "Q\_02", summarize some reports of airbag non-deployment in the subject vehicles. GM has organized the reports by the GM file number within each attachment. Refer to the access database "Q\_03\_REQUEST NUMBER TWO DATA" for categories prescribed by the NHTSA.

- 3. Separately, for each item (complaint, report, claim, notice, or matter) within the scope of your response to Request No. 2, state the following information:**
  - a. GM's file number or other identifier used;
  - b. The category of the item, as identified in Request No. 2 (i.e., consumer complaint, field report, etc.);
  - c. Vehicle owner or fleet name (and fleet contact person), address, and telephone number;
  - d. Vehicle's VIN;
  - e. Vehicle's make, model and model year;
  - f. Vehicle's mileage at time of incident;
  - g. Incident date;
  - h. Report or claim date;
  - i. Whether a crash is alleged;
  - j. Whether property damage is alleged;
  - k. Number of alleged injuries, if any; and
  - l. Number of alleged fatalities, if any.

**Provide this information in Microsoft Access 2010, 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 2010 file labeled "Q\_03\_REQUEST NUMBER TWO DATA." GM has included the information requested above where it was available. Not all reports indicated information pertaining to parts 3a – 3l above.

- 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 reports summarized in Table 2-1 and Table 2-2 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 reports by the GM file number within each attachment.

\* \* \*

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 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 past and present officers and employees, whether assigned to its principal offices or any of its field or other locations, including all of their 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 2007, 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,

A handwritten signature in black ink, appearing to read "M. Carmen Benavides". The signature is fluid and cursive, with the first name "M." and last name "Benavides" clearly distinguishable.

M. Carmen Benavides, Director  
Product Investigations and Safety Regulations

Attachments

GM

9-13-2013

ATTACHMENT 1

Q2

N120261RQ01S Non-  
deployment Complaint Counts

**Table 2-1 Allegations of Non-deployment Citing Driver Airbag**

Table 2-1	SUBCATEGORIES			
TYPE OF REPORT	GM REPORTS	NUMBER WITH PROPERTY DAMAGE	NUMBER WITH CRASH	NUMBER OF INJURIES / FATALITIES
Owner Reports	2	0	2	3 / 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)	2	0	2	3 / 0
Total Vehicles with Reports (Unique VIN)	2	0	2	3 / 0

**Table 2-2 Allegations of Non-deployment for Frontal or Unknown Impact Area with One Person in Vehicle \***

Table 2-2	SUBCATEGORIES			
TYPE OF REPORT	GM REPORTS	NUMBER WITH PROPERTY DAMAGE	NUMBER WITH CRASH	NUMBER OF INJURIES / FATALITIES
Owner Reports	42	1	42	26 / 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)	42	1	42	26 / 0
Total Vehicles with Reports (Unique VIN) **	40	1	40	24 / 0

\* Includes allegations of “airbag” or “airbags” which did not deploy as the customer expected, even if the customer was satisfied after airbag function was explained to them.

\*\* Nine (9) of these incidents included a post-crash vehicle inspection. In all nine cases, the vehicle restraint system was found to have functioned as designed.