



January 31, 2014

Frank Borris
Director's Office
National Highway Traffic Safety Administration
1200 New Jersey Ave, SE, Room W45-302
Washington, DC 20590

N130036
Partial III

NVS-212eer
EA13-005

Dear Mr. Borris:

This letter is General Motors' (GM) response to your Engineering Analysis (EA13-005) request dated November 14, 2013. The subject vehicles are certain model year (MY) 2005-2010 Pontiac G6, 2004-2011 Chevrolet Malibu and 2007 – 2009 Saturn Aura vehicles manufactured by General Motors LLC (GM).

In responding, GM has used the definitions in the Engineering Analysis request dated November 14, 2013. Specifically, the subject component is defined as:

"The original equipment Body Control Module (BCM) on the subject vehicles and any component that the BCM utilizes to monitor the brake pedal position sensor (BPPS). This includes but is not limited to the wiring, connectors, terminals and the BPPS itself."

The alleged defect is defined as:

"Any subject component malfunction that results in one or more of the following conditions: A) the brake lamps remaining illuminated at all times (including when the service brakes are not being applied) and/or failing to illuminate when the service brakes are applied; B) difficulty shifting out of PARK; C) the inability to engage the cruise control; D) the ability to move the gear shift out of PARK without the service brake applied (which may result in a roll-away event); and, E) in suitably equipped vehicles, i) the electronic stability control (ESC) does not engage and/or the ESC light illuminates, ii) the traction control does not engage and/or the traction control light illuminates, and/or, iii) disabling or otherwise affecting the performance of the panic brake-assist feature."



On December 18, 2013, GM responded to request numbers 1 and 7. On January 24, 2014, GM responded to request numbers 2, 3 and 4. As agreed previously, this letter contains GM's response to the remainder of the requests, numbers 5, 6 and 8.

Your requests and our corresponding replies are as follows:

- 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;
- k. Comment, if any, by dealer/technician relating to claim and/or repair; and
- l. Whether the traction control and/or ESC light was illuminated;
- m. Whether the consumer alleged the shift-interlock system was inoperative/disabled;
- n. Whether a roll-away or other unintended vehicle movement is alleged;

Provide this information in Microsoft Access 2010, or a compatible format, entitled "WARRANTY DATA."

To collect the warranty data for this response, GM searched the GM Global Analysis and Reporting Tool (GART-regular warranty), and requested information from the Motorists Insurance Corporation (MIC-extended service contract claims) and the Universal Warranty Corporation (UWC-extended service contract claims) databases.

In responding to this request, GM conducted a comprehensive search using all labor codes that may be related to the alleged defect. These labor codes are also used by

dealers to address issues not included in the alleged defect. As a result, many claims identified in this search are not related to the alleged defect. For example, the labor code related to the BCM (N4800) may have been used to address issues such as dead battery, interior lighting or key fob issues to name a few.

In responding to this request, GM separated the claims into two groups prior to review: those that contained verbatim text and those that did not. This response also includes claims previously submitted in response to RQ13-001.

Claims containing verbatim text

For those claims that contain verbatim text, GM completed a review of all available verbatim text fields for 10 percent of the claims using random sampling. All of the claims with verbatim text that were reviewed in the 10 percent sample as well as those that were not reviewed are contained in the ATT_1_GM; folder labeled "Q_05": refer to the Microsoft Access 2010 file labeled "Q_05_WARRANTY_DATA1".

For those claims that were part of the 10 percent random sample review, GM has added a column indicating;

- In - May be related to the alleged defect
- Out - Not related to the alleged defect
- Unk- Verbatim texts do not contain sufficient information of value to determine if the claim may or may not be related to the alleged defect.

Those claims coded as "in" were additionally coded to indicate the condition described in the warranty repair claim verbatim;

- BL The brake lamps remaining illuminated at all times (including when the service brakes are not being applied) and/or failing to illuminate when the service brakes are applied
- CR The inability to engage the cruise control
- SH Difficulty shifting out of PARK or the ability to move the gear shift out of PARK without the service brake applied (which may result in a roll-away event)
- ESC The electronic stability control (ESC) does not engage and/or the ESC light illuminates, ii) the traction control does not engage and/or the traction control light illuminates, and/or, iii) disabling or otherwise affecting the performance of the panic brake-assist feature."

For requests 5l, 5m and 5n GM has added a column indicating "whether the traction control and/or ESC light was illuminated", a column indicating "whether the

consumer alleged the shift-interlock system was inoperative/disabled", and a column indicating "whether a roll-away or unintended vehicle movement is alleged".

Claims that did not contain any verbatim text

For those warranty claims that did not have any verbatim text, GM reviewed the combination of labor operation codes, causal codes, and customer complaint codes. GM is providing the claims with combinations of these codes that indicate the claims may be related to the alleged defect in the ATT_1_GM; folder labeled "Q_05": refer to the Microsoft Access 2010 file labeled "Q_05_WARRANTY DATA_2". Any of those combinations of codes that are not related to the alleged defect were excluded from this response.

These warranty databases do not contain the vehicle owners name or telephone number. In response to requests 5j and 5k, GM is providing all available verbatim text. The verbatim texts are optional fields in the GM warranty system for the dealer to enter any additional comments that may be applicable to the warranty claim. The verbatim text fields are 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 GM cannot verify that the service personnel have used 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.

The sources of the requested information and the last date the searches were conducted are tabulated in Table 5-1 below.

SOURCE SYSTEM	LAST DATE GATHERED
GART - Regular Warranty	12/11/2013
Motors Insurance Corporation (MIC) - Service Contract Claims	12/11/2013
Universal Warranty Corporation (UWC) - Service Contract Claims	12/11/2013

TABLE 5-1: DATA SOURCES

- 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.

The GM Global Analysis and Reporting Tool (GART) regular warranty database and the MIC extended service contract claims database were searched using the labor codes that may be related to the alleged defect. These labor codes may be found in Table 6-1. The process used to sort the warranty claims is described in detail in response to request number 5.

Labor Code/Global Labor Code	Description
N1720/5430130	Fuse Replacement
H2640/2441960	Pedal and/or Bushing, Brake – R&R or Replace
H2642/2042710	Sensor Brake Pedal Position - Replace
H2643/2000010	Brake and Accelerator Pedal Adjuster Switch Replacement
N2700/2045422	Switch, Stop Lamp - Adjust
N4800/5410030	Body Control Module Replacement
N6612/2045730	Exterior Lighting Wiring and/or Connector Repair or Replacement
N6616/5430940	Serial DATA/DLC/STAR Connector Wiring and/or Connector Repair or Replacement
N6650/5430840	Terminal Replacement
N6651/5430860	Connector Kit Repair
N6652/5430880	Connector with Leads Assembly Replace
N6653/5430902	Wire-To-Wire Repair
N6654/5430922	Connector Reconnection
N6655/5430940	Harness Replacement
N6656/5430962	Ground Connection Repair
H9991/2449919	Customer Concern Not Duplicated
N9595	BCM C2 or X2 Connector Repair
N9613	Lubricate Body Control Module (BCM) Connector with Dielectric Lubricant
V2044	Apply Dielectric Lubricant to C2 Connector (08317)
V2045	Customer Reimbursement (08317)
Z1241	Personal Property Damage
Z1242	RPR/Reimbursement – Product Allegation
Z1243	Inspection – Product Allegation Resolution

TABLE 6-1: LABOR CODES USED IN REGULAR WARRANTY AND MIC SEARCH

All the subject vehicles are covered by a bumper-to-bumper new vehicle limited 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 number of extended service contracts on the subject vehicles that have been sold by MIC and UWC as of November 20, 2013, regardless of status (in-force, expired, or cancelled) are contained in Tables 6-2 and 6-3.

Make	Model	2004	2005	2006	2007	2008	2009	2010	2011	Total
Chevrolet	Malibu	7,973	18,480	23,522	19,253	29,537	36,901	30,148	29,877	195,691
Pontiac	G6	NA	7,342	23,415	26,750	23,483	15,470	2,530	NA	98,990
Saturn	Aura	NA	NA	na	18,715	15,243	6,040	NA	NA	39,998
Total		7,973	25,822	46,937	64,718	68,263	58,411	32,678	29,877	334,679

TABLE 6-2: SUBJECT VEHICLES: MIC EXTENDED SERVICE CONTRACTS SOLD
 (REGARDLESS OF STATUS: IN-FORCE, EXPIRED, OR CANCELLED)

Make	Model	2004	2005	2006	2007	2008	2009	2010	2011	Total
Chevrolet	Malibu	1,563	2,739	2,685	1,662	3,311	3,635	4,686	5,236	25,517
Pontiac	G6	NA	943	2,404	2,014	1,817	905	293	NA	8,376
Saturn	Aura	NA	NA	NA	1013	1,182	605	NA	NA	2,800
Total		1,563	3,682	5,089	4,689	6,310	5,145	4,979	5,236	36,693

TABLE 6-3: SUBJECT VEHICLES: UWC EXTENDED SERVICE CONTRACTS SOLD
 (REGARDLESS OF STATUS: IN-FORCE, EXPIRED, OR CANCELLED)

8. State the number of each of the following that GM has sold that may be used in the subject vehicles by component name, part number (both service and engineering/production), model and model year of the vehicle in which it is used, and month/year of sale (including the cut-off date for sales, if applicable):
- Subject component;
 - Any kits that have been released, or developed, by GM for use in service repairs or replacements to the subject component.

An electronic summary table of the requested service part information for the subject components is provided on the ATT_1_GM disk; folder labeled "Q_08": refer to the Microsoft Excel files contained in the folder. GM does not offer any kits for use in service repairs or as replacements to the subject component.

These sales numbers represent sales to dealers in the US and Canada. This data has limited analytical value in analyzing the field performance of a motor vehicle component because the records do not contain sufficient information to establish the reason for the part sale. It is not possible from this data to determine the number of these parts that have been installed in the subject vehicles or the number remaining in dealer or replacement part supplier inventory. This table contains service part numbers, part description, part usage information including the GM vehicles that contain the identical component, part sales figures by month and calendar year, and the supplier's name and address, contact name and phone number.

* * *

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 their past and present officers and employees, whether assigned to their principal offices or any of their 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 January 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,

A handwritten signature in black ink, appearing to read "M. Carmen Benavides". The signature is fluid and cursive, with a large, stylized initial "M" and "B".

M. Carmen Benavides, Director
Product Investigations and Safety Regulation

Attachments