



August 21, 2015

D. Scott Yon, Chief  
Vehicle Integrity Division  
Office of Defects Investigation  
National Highway Traffic Safety Administration  
1200 New Jersey Ave, SE, Room W46-409  
Washington, DC 20590

N150650

NVS -212  
PE15-027sly

Dear Mr. Yon:

This letter is General Motors' (GM) response to your Preliminary Evaluation (PE15-027) dated August 10, 2015, to investigate allegations of air bag inflator ruptures involving driver air bag inflators manufactured by ARC Automotive, Inc. (ARC). This Preliminary Evaluation (PE15-027) requests certain information concerning all vehicles manufactured by GM for sale or lease in the United States, including, but not limited to, the District of Columbia, and current U.S. territories and possessions, equipped with driver air bag modules, utilizing inflators manufactured by ARC.

Your requests and our corresponding responses are below. The same definitions set forth in PE15-027 and Ms. Sharon Yukevich's July 31, 2015 email amendment apply to these responses.

**REQUEST 1:**

1. State, by model and model year, the number of subject vehicles equipped with the subject component GM has manufactured, during the subject production time frame, for sale or lease in the United States. Separately, for each subject vehicle equipped with the subject component manufactured by GM, during the subject production time frame, state the following:
  - a. Vehicle identification number (VIN);
  - b. Make;
  - c. Model;
  - d. Model Year;
  - e. Subject component part number and design version installed as original equipment;
  - f. Date of manufacture;
  - g. Date warranty coverage commenced; and
  - h. The State in the United States where the vehicle was originally sold or leased (or delivered for sale or lease).

Describe in detail the process GM used to determine the subject vehicle population equipped with the subject component, including why GM believes the process was thorough and comprehensive. Provide the table in Microsoft Access 2010, or a compatible format, entitled "PRODUCTION DATA."



**GM RESPONSE:**

GM requested assistance from ARC in determining the subject vehicle population. In response, ARC provided GM with a spreadsheet that included the following information:

- ARC inflator part number;
- air bag configuration (i.e., dual or single); and
- air bag module manufacturer.

GMNA Interior Engineering used the information from ARC to search the Global Product Development System and identify the GM vehicles equipped with the subject component.

Table 1 below identifies the number of subject vehicles by make, model and model year.

MAKE	MODEL	MODEL YEAR						TOTAL
		2000	2001	2002	2003	2004	2005	
BUICK	LACROSSE	0	0	0	0	0	6253	6253
	LESABRE	0	0	1	3766	119728	37017	160512
	RENDEZVOUS	0	0	0	45784	68078	22495	136357
CADILLAC	CTS	0	0	0	68269	56031	29250	153550
	DEVILLE	0	0	0	3	61806	21644	83453
	SRX	0	0	0	0	31079	11550	42629
	STS	0	0	0	0	0	11625	11625
CHEVROLET	XLR	0	0	0	0	3914	1514	5428
	CAVALIER	3	3740	262999	218571	214631	95852	795796
	CORVETTE	0	0	0	0	0	6711	6711
	EQUINOX	0	0	0	0	0	89490	89490
	EXPRESS 1500	0	0	0	25191	28704	7687	61582
	EXPRESS 2500	0	0	18163	28136	29443	15806	91548
	EXPRESS 3500	0	0	42558	43119	48887	17967	152531
	MALIBU	0	0	0	0	96528	56294	152822
	MALIBU MAXX	0	0	0	0	35797	23119	58916
	SSR	0	0	0	3257	10315	3366	16938
GMC	VENTURE	0	0	0	0	61718	25341	87059
	SAVANA 1500	0	0	0	7345	7132	1744	16221
	SAVANA 2500	0	0	6279	8520	8776	4542	28117
	SAVANA 3500	0	0	15189	15423	23641	5086	59339
OLDSMOBILE	SILHOUETTE	0	0	0	0	7366	0	7366
PONTIAC	BONNEVILLE	0	0	0	285	21163	13319	34767
	G6	0	0	0	0	0	19974	19974
	MONTANA	0	0	0	1	23877	12415	36293
	SUNFIRE	0	1071	76964	37833	35958	18434	170260
SATURN	VUE	0	0	17	19880	92364	22067	134328
	<b>TOTAL</b>	<b>3</b>	<b>4811</b>	<b>422170</b>	<b>479599</b>	<b>1086936</b>	<b>504954</b>	<b>2619865</b>

TABLE 1: SUBJECT VEHICLE PRODUCTION

The production information requested in subparts 1a-1d and 1f-1h is provided on the disk labelled "ATT\_1\_GM" in folder "Q\_01." The relevant file is a Microsoft Access 2010 file labeled

“Q\_01\_PRODUCTION DATA.” The information requested in subpart 1e is provided on the disk labelled “ATT\_1\_GM” in folder “Q\_01e.”

**REQUEST 2:**

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;
  - 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 item 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 RESPONSE:**

GM conducted a thorough and comprehensive search for the information requested in 2a-2f in the source databases listed below in Table 2. The information resulting from the search has been reviewed. The search did not identify any complaints, reports, claims, notices, or matters which relate to, or may relate to, the alleged defect in the subject vehicles. Specifically, based on that search, GM has not identified any allegations of an ARC inflator rupture in any seating position in the subject vehicles.

SOURCE SYSTEM	LAST DATE GATHERED
Customer Assistance Center	8/14/2015
Technical Assistance Center	8/14/2015
Field Information Network Database (FIND)	8/14/2015
Field Product Report Database (FPRD)	8/14/2015
Company Vehicle Evaluation Program (CVEP)	8/14/2015
Captured Test Fleet (CTF)	8/14/2015
Early Quality Feedback (EQF)	8/14/2015
Legal/Employee Self Insured Services (ESIS)/Product Liability Claims/Lawsuits	8/20/2015

TABLE 2 Data Sources

**REQUEST 3:**

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), street address, email 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."

**GM RESPONSE:**

See GM's response to Request 2.

**REQUEST 4:**

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. Describe in detail the search methods and search criteria used by GM to identify the items in response to Request No.2.

**GM RESPONSE:**

See GM's response to Request 2. After reviewing the results of a thorough and comprehensive search, GM was unable to identify any reports or documents related to the alleged defect occurring in GM subject vehicles.

\* \* \*

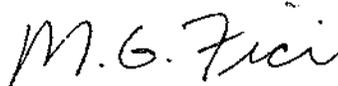
This response is based on searches of GM locations where documents determined to be responsive to your request would ordinarily be found. As a result, the scope of this search did not include, nor could it reasonably include, "all of its divisions, subsidiaries (whether or not incorporated) and affiliated 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 1995, 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 that reads "M.G. Fici". The signature is written in a cursive, slightly slanted style.

Michael G Fici, Senior Manager  
External Investigations

Attachment