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June 11, 2014

By Recall Management Division at 8:41 am, Jun 12, 2014

Ms. Nancy Lewis
Associate Administrator for Enforcement
National Highway Traffic Safety Administration
Recall Management Division (NVS-215)
1200 New Jersey Avenue, SE – Room W45-306
Washington, DC 20590

Dear Ms. Lewis:

The following information is submitted pursuant to the requirements of 49 CFR 573.6 as it applies to a determination by General Motors to conduct a safety related recall involving 2004-2011 model year Saab 9-3 Convertible vehicles.

573.6(c)(1): The vehicles subject to this defect notification were manufactured by Saab Automobile AB (Saab), which, at the time of manufacture, was a subsidiary of General Motors Company.

573.6(c)(2)(3)(4): This information is shown on the attached sheet.

573.6(c)(5): General Motors has decided that a defect which relates to motor vehicle safety exists in 2004-2011 model year Saab 9-3 Convertible vehicles. The automatic tensioning system cable in the driver's side front seat belt retractors may break, causing seat belt webbing spooled out by the user to not retract. If this occurs, it will become obvious to the seat occupant immediately. If a crash were to occur with a seat belt in this condition, the result could increase the injury to the driver.

573.6(c)(6): On February 11, 2014, an investigation was opened in response to NHTSA Vehicle Owner Questionnaires claiming issues with the driver side front seat belt retractor in Saab 9-3 convertibles. On April 17, 2014, a GM Product Investigation Engineer was assigned to work through the issue. On May 22, 2014, it was confirmed that the retractor for the 2005 model year (MY) Saab 9-3 convertible had the same retractor content as the 2004 MY convertible (unlike the retractor for the 2005 MY Saab 9-3 sedans, which had a design change from the 2004 MY sedans). GM was aware of 33 complaints for the 2004 model and none for the 2005 or later model year convertibles. The Saab 9-3 convertible had not been included in the April 2010 safety recall of the Saab 2004 MY sedan recall because (1) the warranty rate for the convertible was much lower than the sedan in 2010, and (2) the lower warranty rate for the convertible was attributed to the different design and application of the seat belt system between the convertible and the sedan.

The issue was presented during an Open Investigation Review (OIR) on June 2, 2014, and on June 4, 2014, the Safety and Field Action Decision Authority (SFADA) decided to conduct a safety recall.



573.6(c)(8): Dealers are to replace the driver side retractor.

Pursuant to 577.11, GM will provide reimbursement to owners for repairs according to the plan submitted on May 23, 2013.

573.6(c)(10): General Motors will provide the dealer bulletin, owner letter and mail dates when available.

573.6(c)(11): General Motors' assigned recall number is 14222.

Special Coverage 10086, which was issued April 2010, and which covered repairs to replace the passenger side retractors on 2004 model year Saab 9-3 sedans, will be updated to (1) expand the coverage from 10 years from the new vehicle date of sale to the life of the vehicles for 2004 Saab 9-3 sedans, and (2) add, for the life of the vehicle, 2004 – 2011 model year Saab 9-3 convertibles, to cover the replacement of the passenger side retractor, if needed, as a result of this condition.

Sincerely,

A handwritten signature in black ink, appearing to read "B. Latouf", written in a cursive style.

Brian Latouf, Director
Field Product Investigations & Evaluations

Attachment

573.6(c)(2),(3),(4)

VEHICLES POTENTIALLY AFFECTED BY MAKE, MODEL, AND MODEL YEAR
PLUS INCLUSIVE DATES OF MANUFACTURE

| <u>MAKE</u> | <u>MODEL SERIES</u> | <u>MODEL YEAR</u> | <u>NUMBER INVOLVED</u> | <u>INCLUSIVE MANUFACTURING DATES (FROM) (TO)</u> | | <u>DESCRIPTIVE INFO. TO PROPERLY IDENT. VEH.</u> | <u>EST. NO. W/CONDITION</u> |
|-------------|---------------------|-------------------|------------------------|--|------------|--|-----------------------------|
| Saab | 9-3 | 2004 | 6,821 | 07/30/2003 | 07/09/2004 | Convertible | * |
| Saab | 9-3 | 2005 | 5,068 | 07/15/2004 | 07/01/2005 | Convertible | " |
| Saab | 9-3 | 2006 | 5,803 | 06/16/2005 | 07/11/2006 | Convertible | " |
| Saab | 9-3 | 2007 | 4,924 | 07/20/2006 | 11/01/2007 | Convertible | " |
| Saab | 9-3 | 2008 | 4,181 | 09/21/2007 | 11/19/2008 | Convertible | " |
| Saab | 9-3 | 2009 | 711 | 10/03/2008 | 03/29/2010 | Convertible | " |
| Saab | 9-3 | 2010 | 1,096 | 10/12/2009 | 09/27/2010 | Convertible | " |
| Saab | 9-3 | 2011 | 185 | 09/30/2010 | 02/15/2011 | Convertible | " |
| GM Total: | | | 28,789 | | | | |

* All involved vehicles will be corrected as necessary.

573.6(c)(2)(iv): The component part that will be replaced to remedy the defect is the retractor supplied by Takata.

TAKATA-PETRI AG
Bahnweg 1
63743 Aschaffenburg, Germany
albrecht.plag@eu.takata.com

The parts were manufactured in Krzeszow, Poland.