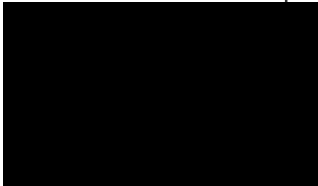

From: Michael J. Robinson
To: Gay P Kent
CC:
BCC:
Sent Date: 2013-07-24 11:21:00:000
Received Date: 2013-07-24 11:21:00:000
Subject: Fwd: *Confidential: Re: Confidential: NHTSA Email Outlining Concerns about Recent GM Actions

Attachments:

This note from NHTSA, both the content and the tone, comes like a bolt out of the blue. □Have you got any sense from Dan or other contacts that Frank Borris' comments about GM slowness to respond and port communications reflects a larger agency view? □We need to address this immediately and I would like to discuss. □We worked way too hard to earn a reputation as the best and we are not going to let this slide.

Mike Robinson
Vice President, Sustainability and Global Regulatory Affairs
General Motors Company



Begin forwarded message:

From: "Carmen Benavides" [REDACTED]
Date: July 24, 2013, 6:40:59 AM EDT
To: "John A. Calabrese" [REDACTED]
Cc: "Alicia S Boler Davis" [REDACTED] "Gay P Kent" [REDACTED]
"Gerald Johnson" [REDACTED] "Jim Federico" [REDACTED] "Maureen
Foley-Gardner" [REDACTED] "Michael J. Robinson"
[REDACTED] "Stephen G Gehring" [REDACTED] "William J.
Kemp" [REDACTED]
Subject: *Confidential: Re: Confidential: NHTSA Email Outlining Concerns about Recent GM Actions

Thanks John. I should be all set at this time. As you know, each field action is unique so I'll be prepared to discuss each item and then listen to their feedback. I'll arrange a follow discussion w/ the EFADC.

Best Regards,

M. Carmen Benavides
Director- Product Investigations, Safety Regulations & Certification,
Field Performance
[REDACTED]

John A. Calabrese---07/23/2013 11:04:21 PM---Carmen, do you need us to support? John

From: John A. Calabrese/US/GM/GMC
To: Carmen Benavides/US/GM/GMC [REDACTED] Alicia S Boler Davis/US/GM/GMC [REDACTED] Gerald Johnson/US/GM/GMC [REDACTED]
Cc: Michael J. Robinson/US/GM/GMC [REDACTED] Jim Federico/US/GM/GMC [REDACTED] Gay P Kent/US/GM/GMC [REDACTED] William
J. Kemp/US/GM/GMC [REDACTED] Stephen G Gehring/US/GM/GMC [REDACTED] Maureen Foley-Gardner/US/GM/GMC [REDACTED]
Date: 07/23/2013 11:04 PM
Subject: Re: Confidential: NHTSA Email Outlining Concerns about Recent GM Actions

Carmen, do you need us to support?

John

Carmen Benavides---07/23/2013 06:33 PM EDT---Dear John, Alicia and Gerald, I wanted to make you aware of the attached email that the NHTSA ODI (O

From: Carmen Benavides
To: John Calabrese; Alicia Boler Davis; Gerald Johnson
Cc: Michael Robinson; Jim Federico; Gay Kent; William Kemp; Stephen Gehring; Maureen Foley-Gardner
Date: 07/23/2013 06:33 PM EDT
Subject: Confidential: NHTSA Email Outlining Concerns about Recent GM Actions

Dear John, Alicia and Gerald,

I wanted to make you aware of the attached email that the NHTSA ODI (Office of Defect Investigations) sent to GM this afternoon. They identified concerns about eight recent actions by General Motors related to recalls, service bulletins or investigations.

We are preparing a point by point response to each of these concerns so that we will be prepared to address them in a face to face meeting that was already scheduled for this Thursday. In addition, at that meeting, we plan to provide details about our internal process and procedures for field actions.

Best Regards,

M. Carmen Benavides
Director- Product Investigations, Safety Regulations & Certification,
Field Performance
[REDACTED]

----- Forwarded by Carmen Benavides/US/GM/GMC on 07/23/2013 06:30 PM -----

From: <Frank.Borris [REDACTED]>
To: <carmen.benavides [REDACTED]>
Cc: <Angel.Jackson [REDACTED]>, <Gregory.Magn [REDACTED]>, <Jeff.Quandt [REDACTED]>, <Jennifer.Timian [REDACTED]>, <Scott.Yon [REDACTED]>
Date: 07/23/2013 03:32 PM
Subject: RE: Meeting on the 25th

Thank you, Carmen. We will also give some feedback about the difficulty in obtaining responses to AQ12-002.

Frank

From: carmen.benavides [REDACTED]
Sent: Tuesday, July 23, 2013 3:20 PM
To: Borris, Frank (NHTSA)
Cc: Jackson, Angel (NHTSA); Magno, Gregory (NHTSA); Quandt, Jeff (NHTSA); Timian, Jennifer (NHTSA); Yon, Scott (NHTSA)
Subject: Re: Meeting on the 25th

Frank,

We'll do our best to address the attached as much as possible this Thursday but will most likely need addition time w/ you and your staff.

Best Regards,

M. Carmen Benavides
Director- Product Investigations, Safety Regulations & Certification,
Field Performance
[REDACTED]

From: <Frank.Borris [REDACTED]>
To: <carmen.benavides [REDACTED]>
Cc: <Scott.Yon [REDACTED]> <Jennifer.Timian [REDACTED]> <Jeff.Quandt [REDACTED]> Gregory.Magno [REDACTED]
<Angel.Jackson [REDACTED]>
Date: 07/23/2013 02:00 PM
Subject: Meeting on the 25th

Carmen,

Sorry I missed your call yesterday. The topics below reflect what we would like to discuss. The general perception is that GM is slow to communicate, slow to act, and, at times, requires additional effort of ODI that we do not feel is necessary with some of your peers. Take for example:

1) PE11-040 G-Van filler pipe corrosion: GM initially undertook a warranty extension program and failed to communicate that decision to us in a timely/proper manner (I think we learned of the program after the decision was made and the program was being

launched? After further discussion GM decided to conduct a regional recall, which was in-line with the resolution in a similar defect investigation (Mitsubishi) with similar rates and consequences.

2) Recall 12V224 Malibu SDM/air bag module reset: Per the 573, through its normal decision making process, GM initially decided to address this as a customer satisfaction campaign then contacted ODI to discuss the matter. However ODI disagreed with the CSP/non-safety action. After further discussion GM ultimately decided to conduct a safety recall instead.

3) PE12-003/EA12-004 Trailblazer/GMT 360 PMWS fires: GM decided to conduct a regional recall for the salt belt states and a Customer Satisfaction Program elsewhere. ODI did not understand the basis upon which a regional action was deemed. GM's reasoning seemed to be based on a rate analysis whereas ODI's reading of the regional policy seemed to envision a technical basis that was supported by field evidence. After pressing GM, it decided to expand the action to a full recall.

4) RQ13-002 Driver A/B (DAB) Module Connector: This was particularly frustrating and all started when ODI raised concern with a TSB that appeared to involve a **(fairly obvious)** safety issue. ODI had discussion with GM and concluded there was an issue that should be. In October 2012 GM agreed to conduct a recall on certain vehicles built April 2012 to June 2012 due to the primary stage shorting bar on the DAB (12V522). When the 573 came in there were issues/concerns with how the scope was identified (the number of vehicles was smaller than we had anticipated) which lead to further discussion and adjustments in the scope/numbers. Also we had concerns with how GM identified affected and unaffected vehicles (the test: if daily production of the igniter exceeded an arbitrarily set failure rate it was included) and GM acknowledged they did not understand the root cause. In January 2013 GM amended the 573, expanding the scope to include vehicles built between Dec 2011 and Feb 2012 however this time due to a shorting bar issue with the secondary stage DAB (new recall number assigned, 13V023). GM advised that the failure trend in this second group of vehicles (a delayed appearance) was different than in the first (early life failure).

5) RQ13-003 GM eAssist: This also started with a TSB that raised suspicions, which lead to several discussions, which lead to a recall, which lead to some questions/concerns amongst NHTSA folks, resulting in the current RQ.

6) Regional Recall Policies: There is a general perception in ODI that GM is one of, if not the worst offender of the regional recall policy. Jennifer Timian will lead this part of the discussion.

Also, we would like to chat about where you are with the brake line kit.

For example:

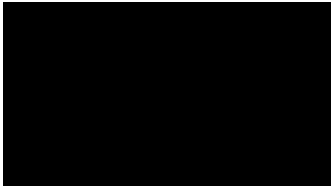
Orders by kit number and region

Issues/concerns from field
Dealer feedback
Consumer awareness/acceptance

I should have gotten this to you sooner but hopefully we can still have some meaningful discussion on each.

Frank S. Borris II

Director, Office of Defects Investigation



[attachment "INOA-RQ13002-5140.PDF" deleted by Carmen Benavides/US/GM/GMC]

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