



Lucy Clark Dougherty
GMNA Vice President & General Counsel

GENERAL MOTORS COMPANY
Mail Code: 482-C25-A36
300 GM Renaissance Center
P.O. Box 300
Detroit, MI 48265-3000
Telephone: (313) 667-7621
lucy.dougherty@gm.com

April 25, 2014

VIA HAND DELIVERY AND U.S. MAIL

O. Kevin Vincent, Esq.
Office of the Chief Counsel (NCC-111)
National Highway Traffic Safety Administration
West Building, W41-326
1200 New Jersey Avenue SE
Washington, DC 20590

Dear Mr. Vincent:

Enclosed is General Motors LLC's ("GM") Supplemental, Restated, and Consolidated Response to the Special Order issued by the Secretary of Transportation on March 4, 2014 ("March 4, 2014 Special Order").

GM's submission today is contained on one DVD. The encryption key for the DVD is: 4EFA36DA2B5BE539090CE.

GM's search for information and documents responsive to the March 4, 2014 Special Order is not yet finished and is continuing. GM will supplement, modify, or amend the response if it discovers additional information responsive to the requests in the March 4, 2014 Special Order.

Please do not hesitate to contact me if you, Mr. Goodman, or Ms. Kolodziej wish to discuss the response or other matters.

Sincerely,

A handwritten signature in cursive script that reads "Lucy Clark Dougherty".

Lucy Clark Dougherty
Vice President and General Counsel
General Motors North America

Enclosures as stated

**UNITED STATES DEPARTMENT OF TRANSPORTATION
NATIONAL HIGHWAY TRAFFIC SAFETY ADMINISTRATION**

1200 New Jersey Avenue, SE
West Building, W41-326
Washington, DC 20590

In re: :
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 TQ14-001 :
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 NHTSA Recall No. 14V-047 :
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**GENERAL MOTORS LLC’S SUPPLEMENTAL, RESTATED, AND
CONSOLIDATED RESPONSE TO MARCH 4, 2014 SPECIAL ORDER**

General Motors LLC (“GM”) submits this Supplemental, Restated, and Consolidated Response to the Special Order issued by the Secretary of Transportation on March 4, 2014 (“March 4, 2014 Special Order”), subject to GM’s General Statement Regarding Limitations and Other Qualifications to Its Responses below. Between March 25, 2014, and April 25, 2014, GM has submitted 23 partial and/or interim responses to the March 4, 2014 Special Order. To date, GM has collected documents from more than 90 custodians and produced to the National Highway Traffic Safety Administration (“NHTSA”) more than 113 GB of data, including approximately 49,000 documents (more than 407,000 pages).

This Supplemental, Restated, and Consolidated Response to the March 4, 2014 Special Order (“Response”) combines and incorporates the responses previously provided in GM’s first through twenty-third partial and/or interim responses and also provides supplemental information.

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REQUESTS & RESPONSES

1. Separately for each model and model year vehicle included within this recall, state the manufacturer and part number of the ignition switch.

Response:

The manufacturer and part number of the ignition switch for each model and model year vehicle included within this recall are provided in the following chart.

Model Year	Make	Model	Ignition Switch Part Number	Manufacturer of Ignition Switch
2003	Saturn	Ion	12450250	Delphi
2004*	Saturn	Ion	12450250	Delphi
2005	Saturn	Ion	10392423	Delphi
2005	Chevrolet	Cobalt	10392423	Delphi
2006	Saturn	Ion	10392423	Delphi
2006	Chevrolet	Cobalt	10392423	Delphi
2006	Chevrolet	HHR	10392423	Delphi
2006	Pontiac	Solstice	10392423	Delphi
2007	Saturn	Ion	10392423	Delphi
2007	Chevrolet	Cobalt	10392423	Delphi
2007	Chevrolet	HHR	10392423	Delphi
2007	Saturn	Sky	10392423	Delphi
2007	Pontiac	G5	10392423	Delphi
2007	Pontiac	Solstice	10392423	Delphi

* GM released ignition switch part number 10392423 as a service part beginning in April 2004.

On March 27, 2014, as amended on March 28, 2014, GM submitted a Part 573 Letter to NHTSA regarding its determination to conduct a safety recall relating to the following Ignition & Start Switch Housing Kits that contain or may contain

ignition switch part number 10392423: GM Parts and ACDelco service part numbers 10392737, 15857948, 15854953, 15896640, and 25846762. GM records indicate these service parts may have been installed during repairs in some 2008-2010 model year Chevrolet Cobalt, 2008-2011 model year Chevrolet HHR, 2008-2010 model year Pontiac Solstice, 2008-2010 model year Pontiac G5, and 2008-2010 model year Saturn Sky vehicles, as well as in some other vehicles.

2. For each unique design version and/or part number, provide diagrams, engineering drawings, and turning torque performance requirements for the subject ignition switch assembly and all sub-components it consists of, including diagrams and engineering drawings for each unique design version of OEM ignition key intended to be used in the subject switch. Discuss and describe the defect condition that can result in the subject switch moving from the run to the accessory or off position, or an interim position between these positions, under certain driving and/or crash incident conditions, including which specific sub-component(s) (*e.g.*, the detent plunger and/or spring) is/are the cause of or involved in the defect condition. Describe and discuss all modifications made to the ignition switch and/or ignition key and the purpose of the modification, state which specific components were modified, discuss when and how those components were modified, provide all part number changes that were associated with the modifications, and provide GM's analysis that proves or supports that the modifications were effective. Also discuss and describe any and all outside influences that may affect the likelihood that the defect condition will occur, such as key chain type or weight, non-OEM ignition key

designs, the specific vehicle dynamic/crash conditions that are of most concern, and any driver/occupant actions/practices that may be a factor. Provide a list of every make, model, and model year vehicle GM manufactured using the subject ignition switch, or any of the suspected and modified subcomponents, as discussed above. Lastly describe and discuss GMs use of the original and modified versions of the subject switch as service parts sold to third parties for both subject, and non-subject vehicle repairs, including how GM intends to manage and control any suspect stock or inventory of unmodified subject ignition switches that could inadvertently be used as a service part (and potentially introduce a defect condition into a vehicle).

Response:

Figure 1 below provides a photograph of the Ignition Switch Bill of Material (“BOM”) for the Delphi PN - 28443966 ASM-antitheft ignition switch.

