

**The following requests relate to statements made by GM in the 2007 portion of the chronology (Attachment B) included in GM's February 24, 2014 Part 573 Report:**

66. Identify each individual involved in the March 29, 2007 meeting between a "group of GM employees . . . [and] NHTSA representatives in Washington, D.C. to discuss occupant restraint systems."

67. Provide all documents related to the March 29, 2007 meeting between a "group of GM employees . . . [and] NHTSA representatives in Washington, D.C. to discuss occupant restraint systems."

68. Identify the "GM investigating engineer [] tasked with tracking crashes in which Cobalts were involved in frontal impacts and the airbags did not deploy," and any other individuals involved with this work.

69. Provide all documents related to the work performed by the "GM investigating engineer [] tasked with tracking crashes in which Cobalts were involved in frontal impacts and the airbags did not deploy."

**The following requests relate to statements made by GM in the 2009 portion of the chronology (Attachment B) included in GM's February 24, 2014 Part 573 Report:**

70. On what date did GM open the referenced February 2009 PRTS? On what date did GM close the referenced PRTS inquiry?

71. Did GM implement the key change following the February 2009 PRTS in any model other than the Cobalt? If yes, state each model to which the key change applied (including the model year for which the key change was first implemented). If no, state the reasons that GM did not implement the key change in any model other than the Cobalt.

72. Did the key change implemented following the February 2009 PRTS differ from the key change proposed in 2005? If yes, identify each difference and state whether and how the difference(s) were relevant to preventing accidental ignition shut-off.

73. Provide all documents related to the key change implemented following the February 2009 PRTS, and identify all individuals involved with the key change.

74. Why did “several GM engineers me[e]t with representatives of Continental, the supplier of the SDMs used in the Cobalt” on or about May 15, 2009?

75. Identify the GM engineers who participated in the meeting with Continental on or about May 15, 2009.

76. Provide all documents regarding the meeting on or about May 15, 2009 between GM and Continental.

77. Regarding the meeting on or about May 15, 2009 between GM engineers and representatives of Continental in which Continental apparently divulged new (and previously unknown to GM) data from two non-deployment incident SDMs: Provide the crash incident details (crash date, vehicle VIN and MMY details, complaints, law suits, injury/fatality counts, PARs, field inspection details, photos, etc.) for the crashes associated with the two (2) SDMs GM provided to Continental. Discuss in detail the nature and meaning of the data Continental was able to access (and that was apparently inaccessible to GM) from the two SDMs, and how it was used to determine, or otherwise showed that the SDM sensing algorithm had been disabled during the two crash incidents. State the reasons Continental provided for why the airbag sensing algorithm had been disabled during the crash events, and discuss any explanations Continental provided as to why this was not apparent in the data readily available to GM, or to others who use commercially available tools to access such information. Describe the method or means by which Continental was able to access this data, and state whether or not GM currently has the capability to access this same information, and if so, state when GM obtained this capability. Provide copies of any and all documents that were provide by any party present at the meeting.

or that were subsequently provided or exchanged as a result of, or in connection with the meeting, and state the current location and disposition of the two SDMs provided to Continental.

**The following requests relate to statements made by GM in the 2010 portion of the chronology (Attachment B) included in GM's February 24, 2014 Part 573 Report:**

78. Did GM perform any work in 2010 to investigate crashes in any of the recalled vehicles in which the airbags did not deploy? If so, describe the nature of the work, identify all individuals involved, and provide all related documents.

**The following requests relate to statements made by GM in the 2011 portion of the chronology (Attachment B) included in GM's February 24, 2014 Part 573 Report:**

79. On what date did GM initiate a Field Performance Evaluation "investigation of a group of crashes in which airbags in 2005 -2007 model year Chevrolet Cobalts and a 2007 Pontiac G5 had not deployed during frontal impacts"?

80. Identify each individual involved with the Field Performance Evaluation "investigation of a group of crashes in which airbags in 2005 -2007 model year Chevrolet Cobalts and a 2007 Pontiac G5 had not deployed during frontal impacts."

81. Provide all documents related to GM's Field Performance Evaluation "investigation of a group of crashes in which airbags in 2005 -2007 model year Chevrolet Cobalts and a 2007 Pontiac G5 had not deployed during frontal impacts," including all documents related to the reasons that GM initiated this investigation.

**The following requests relate to statements made by GM in the 2012 portion of the chronology (Attachment B) included in GM's February 24, 2014 Part 573 Report:**

82. What steps did those involved in GM's Field Performance Evaluation investigation take to "identify design changes to the ignition switch"? To the extent the answer to this request involves discussions with GM employees or employees of GM's supplier, identify the individuals involved in those discussions and identify the date(s) and substance of those

discussions.

83. Provide all documents related to the steps taken by those involved in GM's Field Performance Evaluation investigation to "identify design changes to the ignition switch."

84. On what date did GM initiate a study using the "Red X" problem-solving methodology to "better understand[] the differences in observed torque performance"?

85. Identify each individual involved with a study using the "Red X" problem-solving methodology to "better understand[] the differences in observed torque performance."

86. What were the results of the "Red X" study?

87. Provide all documents related to the "Red X" study, including all documents related to the reasons that GM initiated the study.

88. On what date did GM initiate a study using the "Design for Six Sigma" problem-solving methodology to "better understand[] the differences in observed torque performance"?

89. Identify each individual involved with a study using the "Design for Six Sigma" problem-solving methodology to "better understand[] the differences in observed torque performance."

90. What were the results of the "Design for Six Sigma" study?

91. Provide all documents related to the "Design for Six Sigma" study, including all documents related to the reasons that GM initiated the study.

**The following requests relate to statements made by GM in the 2013 portion of the chronology (Attachment B) included in GM's February 24, 2014 Part 573 Report:**

92. How did the Field Performance Assessment Engineer learn, in late April 2013, "that the torque performance of a GM service part ignition switch purchased after 2010 differed substantially from that of an ignition switch that was original equipment installed on a 2005 Cobalt"? Provide all related documents.

93. Provide all documents related to the statement that the Field Performance Assessment Engineer “also learned that others had observed and documented that the detent plunger and spring used on the service part switch differed from those used on the original equipment switch installed on the 2005 Cobalt.”

94. On what date did GM retain “outside engineering resources to conduct a comprehensive ignition switch survey and assessment”? Identify the “outside engineering resources” GM retained.

95. Provide all documents related to the “comprehensive ignition switch survey and assessment” performed by outside engineering resources.

96. Describe all communications GM had with its supplier regarding changes to the ignition switch in vehicles subject to the recalls, identify all individuals involved in those communications (whether at GM or its supplier), and provide all related documents.

97. Provide all documents GM received on October 29, 2013 from its supplier “showing that changes had in fact been made to the detent plunger and spring late in the 2006 calendar year.”

98. Describe the “[t]esting and analysis” that “further determined that whether a key moves from the ‘run’ to ‘accessory’ position and how that key movement affects airbag deployment depends on a number of factors,” including the date(s) that the “[t]esting and analysis” was initiated and concluded, and provide all documents related to that “[t]esting and analysis.”

99. On what date did the investigating engineers involved in GM’s Field Performance Evaluation investigation present their findings and proposed solutions to the FPERC?

100. What findings and proposed solutions did the investigating engineers involved in

GM's Field Performance Evaluation investigation present to the FPERC? Identify all individuals involved and provide all related documents.

101. Did the FPERC request further analysis? If so, describe the further analysis it requested, the reasons for the request, and provide all related documents.

102. On what date did the FPERC present recommendations to the Executive Field Action Decision Committee? Identify all individuals involved and provide all related documents.

103. What recommendations did the FPERC present to the Executive Field Action Decision Committee?

104. What "[f]actual questions were raised" at the December 17, 2013 meeting with the Executive Field Action Decision Committee "that required further analysis? What "further analysis" took place? Identify the individuals involved in the "further analysis," and provide all related documents.

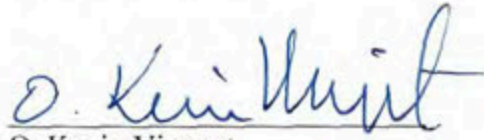
105. Describe the findings of the "further analysis" presented at a January 31, 2014 meeting with the Executive Field Action Decision Committee, and provide all related documents.

106. With respect to the defect that is the subject of this recall, what model and model year vehicles did the Executive Field Action Decision Committee discuss at the December 17, 2013 meeting? If any vehicles other than MY 2005-2007 Chevrolet Cobalt and MY 2007 Pontiac G5 vehicles were discussed, describe in detail the content of those discussions, and provide all related documents.

107. With respect to the defect that is the subject of this recall, what model and model year vehicles did the Executive Field Action Decision Committee discuss at the January 31, 2014 meeting? If any vehicles other than the vehicles subject to this recall were discussed, described in

detail the content of those discussions, and provide all related documents.

Dated: March 4, 2014

A handwritten signature in blue ink, appearing to read "O. Kevin Vincent". The signature is written in a cursive style with a horizontal line underneath the name.

O. Kevin Vincent  
Chief Counsel