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Mr. Sean E. Kane
Safety Research & Strategies, Inc.
340 Anawan Street/Suite 200
Rehoboth, Massachusetts 02769

Dear Mr. Kane:

Your letter of September 2, 2009 to Mr. Henderson has been referred to me for reply, as I am the Director of Global Structure & Safety Integration Center for General Motors. Your letter appears to be a follow-up to an article that was recently published in the Kansas City Star.

Some background about this issue is in order. All GM vehicles sold to US customers through GM dealers and sold directly to Fleet customers for rental purposes meet or exceed federal safety standards set by NHTSA. Our vehicles are designed to provide a comprehensive safety system to protect passengers before, during and after a crash.

Currently there are no regulations that require inflatable side impact protection, but GM has offered vehicles with side impact airbag technology for more than a decade. Until now, the technology has been standard in some models and optional in others, depending on customer preferences. Beginning with the 2010 MY, every (100%) GM vehicle with a GVWR \leq 8500 lbs will be equipped with standard side airbag head protection as part of an industry-wide, voluntary commitment to improve vehicle-to-vehicle crash compatibility. In addition to standard side airbag head protection, this new compatibility commitment has prompted a wide range of occupant protection technologies and designs including enhanced matching of vehicle front structural components for front-to-front crashes and enhanced side impact performance.

Turning now to the specific issue of the deletion of the head curtain airbag for fleet sales, GM allowed fleet customers to modify option availability or delete select standard retail vehicle options to be competitive with other manufacturer's offerings or better meet the fleet customer's specific vehicle needs. This was relevant during the 2006 through 2008 models years, as some comparable competitive vehicles did not offer these airbags as standard in their retail offerings.

When modifications or deletes are made to a GM vehicle for fleet purchase, the deleted equipment is clearly marked on the original window sticker as well as on the invoice. In GM-sponsored closed auctions, the content of each GM vehicle is fully disclosed. In the case of non-GM-sponsored auctions, auction participants and buyers must take due care to ensure they fully comprehend the specific content of the vehicle. Dealers should always check the equipment content of any used vehicle that they acquire.

The owners' manuals for vehicles that were available for fleet sales with the option to delete the head curtain airbag clearly state that the vehicle may or may not have roof-rail airbags and advise the vehicle operator and any subsequent purchaser how to determine whether the vehicle is so equipped. As the owners' manuals explain, if the vehicle has roof-rail airbags, the word AIRBAG will appear along the headliner or trim (also described as on the airbag covering on the ceiling near the side windows). If a fleet customer has chosen to delete the head curtain airbag, the word AIRBAG is not embossed on the vehicle's headliner or trim. This marking of airbag locations provides an easy visual cue as to which airbags are in a given vehicle.

GM has also taken the following actions regarding the vehicles mentioned in the Kansas City Star article:

- Modified its GM Certified website so that when a dealer prints the window sticker for one of these vehicles, the side airbag feature will no longer be included automatically in the list of standard features for the vehicle.
- Contacted the key internet providers (such as AutoTrader.com, Cars.com, etc.) and advised them that side airbags were not included as standard equipment in these certified used fleet vehicles.
- At our request, eBay has also put a change in place for all certified used vehicles.
- Called dealer 3rd party providers and advised them to update their systems to block the side airbag feature from appearing automatically on a window sticker and to replace all window labels with correct information.
- Called dealers that had certified used car inventory with the side airbag option deleted so they can remove the window label and replace it with correct information.

We are confident that these efforts have been successful.

I trust that these actions have addressed the issues that you have raised in your letter.

Regards,

Brian Latouf
Director, Global Structure &
Safety Integration Center

cc: F. Henderson