October 13, 2010

Mr. Daniel C. Smith
Associate Administrator for Enforcement
National Highway Traffic Safety Administration
Recall Management Division (NVS-215)
1200 New Jersey Avenue, SE - Room W45-306
Washington, D.C. 20590

Dear Mr. Smith:
The following information is submitted pursuant to the requirements of 49 CFR 573.6 as it applies to a determination by General Motors of a noncompliance involving certain 2009 and 2010 model year Chevrolet Impala vehicles.

## 573.6(c)(1): Chevrolet Brand of General Motors LLC

573.6(c)(2)(3)(4): This information is shown on the attached sheet.
573.6(c)(5): General Motors has decided that certain 2009 and 2010 model year Chevrolet Impala vehicles fail to conform to Federa//Canada Motor Vehicle Safety Standard 210, Seat Belt Assembly Anchorages. The front safety belt webbing may not have been properly secured to the lap belt anchor pretensioner mounted to the side of the seat nearest the door. As a result, the safety belt may not restrain the occupant as intended during a crash, which could result in injury to the occupant.
573.6(c)(7): The condition is due to an assembly error where the operator did not properly install the pretensioner anchor. When properly installed, a bolt is threaded through the pretensioner anchor into a nut. In cases where the pretensioner anchor is not secured, the anchor may not be fully seated and as a result the anchor is not secured by the bolt, but rather it may be clamped between the bolt and anchor plate. In other cases, if the pretensioner is installed with a $180^{\circ}$ twist and the error proofing feature to ensure no twist is broken, the anchor may be supported by the bolt threads instead of the bolt shoulder.
In June 2009, GM investigated nine reports of seat belt warranty repairs that noted separation. GM believed that all incidents had been identified and were confined to vehicles built in July through September 2008. However, as a result of additional warranty reports being identified, in July 2010, a Product Investigation Engineer was assigned to investigate and understand seat belt warranty repairs where the technician reported separation.

As of August 13, 2010 there were 32 warranty reports of seat belt anchors that were either twisted or partially installed and reported to have separated during vehicle use.

There are no reports of injuries or fatalities where the belts were reported to have the condition.
The issue was presented to the Field Performance Evaluation Review Committee and on October 7, 2010, the Executive Field Action Decision Committee decided to conduct a noncompliance recall.
573.6(c)(8): Dealers are to inspect both front safety belts for proper installation of anchors to pretensioners and, if necessary, reinstall the anchors.
GM anticipates sending the dealer bulletin on October 13, 2010 and mailing the owner letters on October 26, 2010.

Pursuant to 577.11 (e), GM does not plan to provide notice about reimbursement to owners because all involved vehicles are covered under the new vehicle warranty.
573.6(c)(10): GM will provide the dealer bulletin and owner letter when available.

Sincerely,

M. Carmen Benavides

Director, Product Investigations and Safety Regulations

N100312
Attachment
573.6(c)(2),(3),(4)

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

> * All involved vehicles will be corrected as necessary.
> 573.6(c)(2)(iv): N/A

