U.S. Department
of Transportation
**National Highway
Traffic Safety
Administration**

1200 New Jersey Avenue SE.
Washington, DC 20590

May 14, 2015

BY EMAIL ONLY

Lucy Clark Dougherty
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General Motors Company
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Dear Ms. Dougherty:

As discussed during the April 23, 2015 telephonic meeting between the National Highway Traffic Safety Administration ("NHTSA") and General Motors Company ("GM"), NHTSA has found the process under Paragraphs 25 and 26 of the May 16, 2014 Consent Order between NHTSA and GM to be a productive and effective tool to proactively and expeditiously address potential safety-related defects. I understand that GM shares that sentiment and has found the process to be a positive one in facilitating communication between GM and NHTSA's Office of Defects Investigation.

NHTSA hereby exercises its option to renew the monthly meetings under Paragraph 25 of the Consent Order for an additional year and to extend the obligation to make submissions under Paragraph 26 by an additional twelve monthly submissions pursuant to the agency's information gathering authority, 49 U.S.C. § 30166(g).

Paragraph 25 provides:

> GM shall meet with NHTSA on a monthly basis for one year following the execution of this Consent Order to report, in the manner specified by NHTSA, on new technical service bulletins (TSBs) or other dealer communications, GM's decision-making associated with safety-related or high-frequency warranty claims or safety-related field reports, and any other actual or potential safety-related defect issues. NHTSA may extend the period of time for monthly meetings pursuant to this Paragraph for up to the term of this Consent Order.

Paragraph 26 requires:

> On a monthly basis for a period of one year, GM shall provide NHTSA with a written list of every safety-related issue concerning vehicles already in the fleet that is under consideration by any GM Product Investigator or otherwise under consideration by GM's Global Vehicle Safety organization. For each safety-related issue, the list shall include the model and model year vehicles affected or potentially affected and a description of the safety-related issue. Such reporting obligations will extend only to: (a) vehicles within GM's United States fleet; (b) other vehicles that are substantially similar to vehicles within GM's United States fleet; and (c) other vehicles that share common parts with vehicles within GM's United States fleet.

NHTSA is not exercising its option to renew and extend these requirements based on a concern with GM's performance to date, but rather to continue the dialogue those requirements have facilitated on important safety issues.

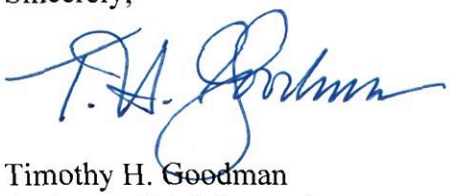
The meetings and submissions pursuant to Paragraphs 25 and 26 have been important in proactively addressing safety issues. Among other things, the Consent Order required GM to "improve and implement company processes for the purpose of identifying and reporting safety-related defects more quickly." Consent Order ¶ 21. The Consent Order also required that "GM shall revise its product quality analytics to improve its ability to identify safety consequences and the severity of those consequences, as well as to assess the number or rate of allegations, complaints, incidents, reports and/or warranty claims relating to potential safety-related defects." Consent Order ¶ 22. NHTSA considers the meetings pursuant to Paragraph 25 and submissions pursuant to Paragraph 26 an important part of its oversight to ensure that the changes GM has made to its processes, analytics, and culture are effective.

At this time, NHTSA hereby exercises its option to renew the Paragraph 25 meetings for an additional year but reserves its ability to renew the requirements of Paragraph 25 through the full remaining three-year term of the Consent Order. Likewise, NHTSA reserves its ability to further extend the requirements of Paragraph 26 pursuant to its Safety Act information gathering authority.

NHTSA is not exercising its option to renew the meetings pursuant to Paragraph 16 of the Consent Order at this time. Paragraph 16 provided for monthly meetings "to discuss with NHTSA recommendations resulting from the investigation conducted by Anton Valukas and their implementation at GM." NHTSA believes that the quarterly Consent Order meetings pursuant to Paragraph 28 will provide sufficient opportunity for updates on GM's implementation of the Valukas recommendations for the remainder of the Consent Order term.

Please feel free to contact me or Kerry Kolodziej of my staff with any questions you may have.

Sincerely,



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