



GENERAL MOTORS LLC
Global Vehicle Safety

USG 4844
June 7, 2019

Honorable Heidi King
Deputy Administrator
National Highway Traffic Safety Administration
1200 New Jersey Avenue, S.E.
Washington, D.C. 20590

Re: Recall No. 19V375; Petition for Determination of Inconsequential Noncompliance, Federal Motor Vehicle Safety Standard No. 108 (Lamps, Reflective Devices, and Associated Equipment)

Dear Deputy Administrator King:

Pursuant to 49 CFR Part 556, 49 USC §30118(d) and §30120(h), General Motors LLC (“GM”) requests an exemption from the notification and remedy requirements of the National Traffic and Motor Vehicle Safety Act for a noncompliance with Federal Motor Vehicle Safety Standard (FMVSS) No. 108 on the basis that the noncompliance is inconsequential to motor vehicle safety.

In accordance with 49 CFR Section 556.4(b)(6), GM has submitted a 49 CFR Part 573 noncompliance notification report to the agency. The Part 573 report provides additional details regarding the noncompliance, including the number of vehicles and the vehicle models affected. Three copies of that report are enclosed with this petition.

Description of the Noncompliance

GM’s headlamp supplier for last-generation GMC Terrain vehicles (model years 2010 to 2017), II Stanley Co., Inc. (“Stanley”), supplied headlamps for these vehicles with lower beams¹ failing to conform, in part, to S10.15.6 of FMVSS No. 108. As illustrated in Figures 1 through 5, below, a reflection from the headlamps’ housing is directed 80 degrees outboard and 45 degrees upward, as measured from each lamp’s optical axis. This reflection can dimly illuminate two small areas high above the vehicle, one to the far left and the other to the far right of the vehicle, outside of the driver’s view and not directed in a way that will create glare for oncoming or other surrounding vehicles. When tested, this reflection from a single point on each lamp may be brighter than the maximum designated in section S10.15.6 and Table XIX of FMVSS 108 for the 10°U to 90°U zone.

In 2009, before beginning production of these headlamps, Stanley validated and certified to GM that the headlamps complied with all applicable requirements of FMVSS 108. Stanley also provided documentation from Intertek, an A2LA certified third-party testing laboratory, certifying the compliance of these headlamps at the time. Neither Stanley nor Intertek identified any potential compliance issue with these lamps.

¹ This condition affects the lower beam headlamps only; the condition is not present when the high beams are activated.



The following Figure 1 shows the path of the reflection on the left headlamp:

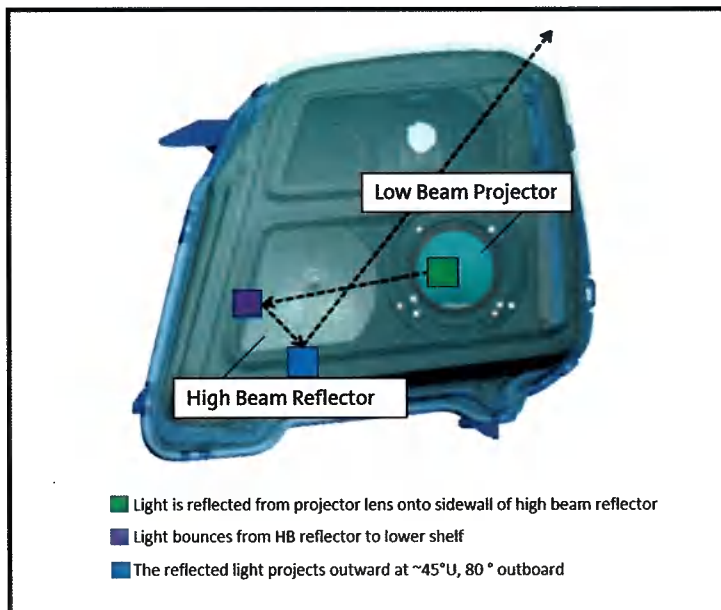


FIGURE 1 – PATH OF REFLECTED LIGHT

The following Figure 2 shows the location of the small area illuminated by the reflection from the left lamp on a fifteen-foot-tall ceiling. This picture was taken in a darkroom specifically used for vehicle lighting tests. While not pictured, a similar area, in a similar location, from the righthand lamp could be seen on the right side of the vehicle.



FIGURE 2 – REFLECTED LIGHT FROM LEFT HEADLAMP AS SEEN FROM REAR OF VEHICLE

Each reflection point is near the edge of the 10°U-90°U range. The following Figures 3 through 5 show the reflection from the left headlamp in relation to the 10°U-90°U zone. The reflection from the right lamp is in a similar location on the opposite side of the vehicle. As measured, the reflection is approximately 45° up, 80° outboard; 6.6° wide by 4.9° deep; 2.2 lumens at 10 meters; and 450-470 cd.

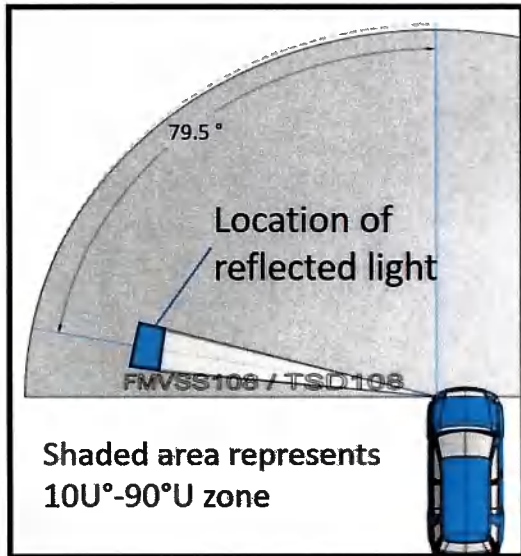


FIGURE 3 - PLAN VIEW OF REFLECTED LIGHT OVERLAID ONTO 10°U-90°U ZONE

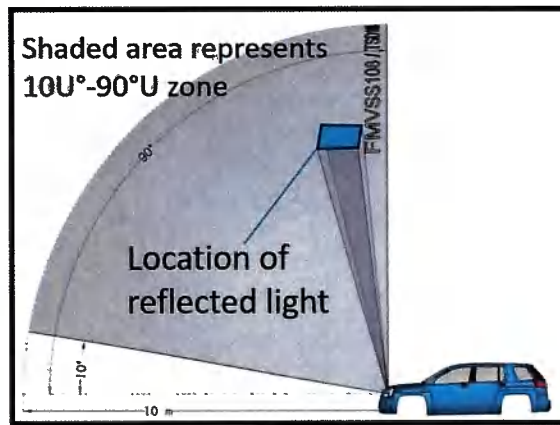


FIGURE 4 - SIDE VIEW OF REFLECTED LIGHT OVERLAID ONTO 10°U-90°U ZONE

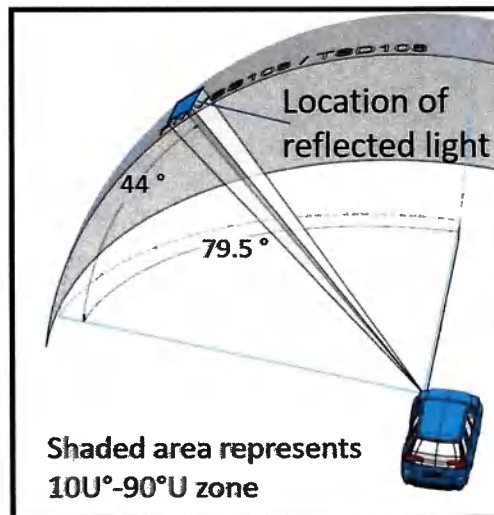


FIGURE 5 - ORTHOGONAL VIEW OF REFLECTED LIGHT OVERLAID ONTO 10°U-90°U ZONE

The Noncompliance is Inconsequential as it relates to Motor Vehicle Safety

This noncompliance is inconsequential to motor vehicle safety for at least the following reasons:

- The reflection has no effect on vehicle safety for oncoming or surrounding vehicles;
- The reflection has no effect on vehicle safety for the subject vehicles;
- GM is aware of only a single customer inquiry associated with this condition and is not aware of any crashes or injuries;
- The headlamps comply with recognized industry standards;
- The headlamps comply with applicable requirements for global regions, including United Nations ECE R112;
- The issue has been corrected for service parts and does not affect current-generation vehicles;
- Aside from this reflection, the headlamps conform in all respects with the requirements of FMVSS 108.

Each of these points is considered in further detail as follows.

A. The reflection has no effect on vehicle safety for oncoming or surrounding vehicles

The narrow reflections in question do not create a safety risk for oncoming or surrounding drivers due to the extreme angle of the reflection, as described in Figure 1 through Figure 5, above. This angle, 80 degrees outboard and 45 degrees upward from each lamp's optical axis, is far above the range where the reflection could cause glare for oncoming or surrounding drivers, including the industry-recognized "glare points" referenced in Table XIX of FMVSS 108 at the following ranges: 0.5°U - 1.5°L to L, 1°U - 1.5°L to L, 0.5°U - 1°R to R, 1.5°U - 1°R to R.

B. The reflection has no effect on vehicle safety for drivers of the subject vehicles

The areas illuminated by the narrow reflections in question are not visible to drivers of the subject vehicles. These two small areas appear high above the vehicle,² one to the far left and the other to the far right of the vehicle, well outside of the driver's view.

While these reflections may be somewhat perceptible in certain extremely dense fog or snow conditions, there would be no effect on vehicle safety due to the small size and far outboard location in the driver's peripheral field of view. Any detectable light would be negligible compared to other outside sources of illumination such as glare from oncoming traffic or fog glare forward of the vehicle from any FMVSS compliant headlamp.

² The exact height will depend on the distance to the reflecting surface.

C. GM is aware of only a single customer inquiry associated with this condition, and is not aware of any crashes or injuries

GM reviewed all relevant field data and found just a single customer inquiry within the global vehicle population of nearly 820,000 vehicles sold over eight model years. The customer stated, “Left head lamp seems to have a portion of the light that shines up in the trees at near a 45-degree angle.” GM identified no other related field reports, including in warranty, TREAD, VOQ and legal data.

D. The headlamps comply with recognized industry standards

S6.1.1 of SAE International Standard J1383, *Performance Requirements for Motor Vehicle Headlamps* (May 26, 2010), sets forth certain industry-recognized intensity and size limits on headlamp photometrics. Specifically, for a zone extending 20° left to 20° right, and 10° to 60° up from the lamp optical axis, the light projected cannot exceed 550 candela and cannot occupy more than five percent of the zone’s total area. As depicted in Figures 6 and 7, the reflection from the subject lamps is well outside of this zone. Even if the reflection were within this zone, the headlamps would remain compliant, as the reflection would not exceed the maximum of five percent of the total area or the maximum of 550 candelas.

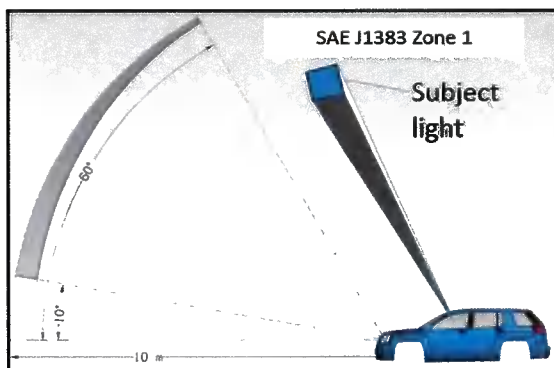


FIGURE 6 – SIDE VIEW OF REFLECTED LIGHT OVERLAID ONTO SAE ZONE 1

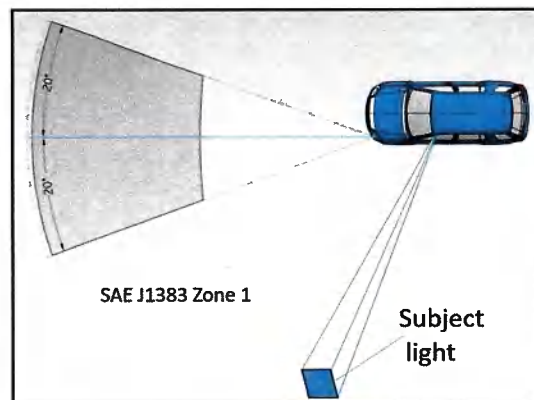


FIGURE 7 – PLAN VIEW OF REFLECTED LIGHT OVERLAID ONTO SAE ZONE 1

E. The headlamps comply with applicable requirements for global regions, including UNECE R112³

S6.2.4 and Annex 3, Figure B of UNECE R112 specify photometric test points for the passing beam (i.e., lower beam headlamp). The photometric points extend to 4° above the lamp optical axis. The subject reflection is well above those test points.

³ United Nations ECE Addendum 111: Regulation No. 112, Rev. 3 (Jan. 9, 2013)

F. The subject condition has been corrected for service parts and does not affect current-generation vehicles

GM is purging all affected service and replacement headlamps from dealer stock. Stanley has redesigned service and replacement headlamps to add graining to the inadvertent reflecting surfaces, which will prevent the reflections that are the cause of the issue. These redesigned lamps are expected to be available June 12, 2019.

Current-generation GMC Terrain vehicles (model years 2018 and newer) use a different headlamp design and are not affected by this condition.

Conclusion

For these reasons, GM petitions to be exempted from the recall and remedy provisions of the Safety Act for this noncompliance with FMVSS 108 for this population of vehicles.

If you have questions regarding this petition, please contact me or Matthew Jerinsky of GM's Washington, D.C. office.

Sincerely,



Brian Latouf, Executive Director
Global Safety Field Investigations and
Regulations

Enclosure:
Three copies of corrected Part 573 letter



N192223240 Non-Compliance Inconsequential DUE to NHTSA: Thur May 16, 2019

Title: FMVSS 108 Veiling glare

Title is not part of the 573 submission, but may appear on VIN lookup, Global Warranty, bulletins, or submissions to other agencies

Information must be submitted by the due date at NHTSA's recall portal <https://map.safercar.gov/portal/signin>

Note: Cell entries over 2000 characters will have to entered as attachments

Yes - Petition for Inconsequential Noncompliance 49 CFR 556

Vehicle Information

573.6 (c) (1) (2) (3) (4)

Model Year(s), Make, Model	Descriptive Information <ul style="list-style-type: none"> The basis for how the recall population was determined and How the recalled products differ from products that were not included in the recall Identify the number of affected products related to this specific make/model/model year combination, where available 	Beginning Production Date (mm/dd/yyyy)	Ending Production Date (mm/dd/yyyy)
2010-2017 GMC Terrain	Manufacturing records were used to identify affected vehicles. 726,959 GMC Terrain vehicles are affected by this recall.	05/21/2009	07/13/2017

Total Population

Number Potentially Involved	726,959	Estimated Percentage of Involved With Defect	100 %
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Defect / Noncompliance Description

573.6 (c) (5)

<p>Describe the defect or noncompliance:</p> <p>General Motors has decided that the lower beam headlamps in 2010-2017 GMC Terrain vehicles fail to conform, in part, to S10.15.6 of Federal Motor Vehicle Safety Standard (FMVSS) No. 108, "Lamps, reflective devices, and associated equipment." A reflection caused by the headlamps' housing can project a narrow beam of light 80 degrees outboard and 45 degrees upward of each lamp's forward-center axis. This can dimly illuminate two small areas high above the vehicle, one to the far left and the other to the far right of the vehicle, outside of the driver's view and not directed in a way that will create glare for oncoming or other surrounding vehicles. When tested, the light emitted from this single point on each lamp may be brighter than the maximum designated in section S10.15.6 and Table XIX of FMVSS 108.</p>
<p>Describe the safety risk:</p> <p>GM believes the risk to motor vehicle safety is inconsequential.</p>
<p>(Optional) Describe the cause:</p>

The headlamp design allows a narrow beam of light from the lower beam lamp to reflect off of the inner surface of the high beam reflector. The lamps' high beams are not affected by this condition.

(Optional) Identify any warning which can precede or occur:

[intentionally left blank]

Does this recall only affect products in certain geographic regions?

No

Manufacturer of Defective Component

If applicable, identify the manufacturer of the defective or noncompliant component.

If the manufacturer of the component is unknown, provide information for the company that supplied the subject component.

Company Name, Address:	Company Contact (Name, Position, Phone, email):
I I Stanley Co., Inc 1500 Hill-Brady Rd. Battle Creek, MI 49037	Adam Clark 269-420-2500

Chronology of Defect / Noncompliance Determination

573.6 (c) (6) (7)

Describe the chronology of events leading up to the defect decision or test data for the noncompliance decision:

On April 8, 2019, GM received an email from Transport Canada indicating that the lower beam headlamps in certain last-generation GMC Terrain vehicles may not comply with Canada Motor Vehicle Safety Standard (CMVSS) No. 108 (1), referencing Technical Standards Document No. 108, Lamps, Reflective Devices, and Associated Equipment (TSD 108). After a preliminary evaluation, GM opened an investigation into the issue on April 23, 2019. GM determined that these headlamps should also be evaluated under S10.15.6 of FMVSS 108, which has similar requirements to S10.15.6 of TSD 108.

GM's engineers contacted the headlamp supplier, who in 2009 had certified to GM that these headlamps complied with all applicable requirements of FMVSS 108, including S10.15.6. The supplier also provided certification documentation from a third-party testing laboratory contracted by the supplier at that time. Neither the supplier nor the testing lab identified a potential compliance issue with these lamps.

The investigator and GM's lighting engineers tested representative headlamps in the lab and reviewed design data provided by the headlamp supplier. They determined that a reflection caused by the headlamps' housing design can project a narrow beam of light 80 degrees outboard and 45 degrees upward of each lamp's forward-center axis.

In addition to laboratory testing, GM's investigator searched warranty and other field data for reports relating to this condition. Out of a global vehicle population of nearly 820,000 vehicles over seven model years, only a single customer inquiry was identified.

The matter was reviewed by GM's Open Investigation Review (OIR) board on May 6, 2019. On May 9, 2019, GM's Safety and Field Action Decision Authority (SFADA) decided that the light emitted from the identified single point on each lamp may be brighter than the maximum designated in section S10.15.6 and Table XIX of FMVSS 108, but believes the condition is inconsequential to motor vehicle safety. GM intends to petition NHTSA for an exemption from the notice and remedy provisions of the Federal Motor Vehicle Safety Act for this condition for all affected vehicles.

Identify the Remedy

573.6 (c) (8)

Describe the defect/noncompliance remedy program, including the manufacturer's plan for reimbursement:

Remedy: GM intends to petition NHTSA for an exemption from the notice and remedy provisions of the Federal Motor Vehicle Safety Act.
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Reimbursement Plan:

[intentionally left blank]

Describe what distinguishes the remedy component from the recalled component.

- The name, description, and part number of the recalled component(s) must also be reported in this field. (Motor Vehicle Safety Act, 49 U.S.C. §30119(g) - Section 24116 of the FAST Act)

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Recalled Component Name:	Headlamp Asm.
Recalled Component Description:	Headlamp Asm.
Recalled Component Part Number:	23319179, 80, 81, 82, 84064624, 25, 26, 27
Recalled Component Country of Origin:	US

(Optional) Identify and describe how and when the recall condition was corrected in production:

These vehicles are a prior generation GMC Terrain. The current generation, beginning model year 2018, use a different headlamp design.

Identify the Recall Schedule

Describe the recall schedule for notifications:

Planned Dealer Notification Begin Date (mm/dd/yyyy):	
Planned Dealer Notification End Date (mm/dd/yyyy):	
Planned Owner Notification Begin Date (mm/dd/yyyy):	
Planned Owner Notification End Date (mm/dd/yyyy):	
Manufacturer's identification code for this recall:	N192223240

(Optional) Manufacturer's Comment to NHTSA Staff:

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<p>(Optional) Describe the cause:</p>

The headlamp design allows a narrow beam of light from the lower beam lamp to reflect off of the inner surface of the high beam reflector. The lamps' high beams are not affected by this condition.

(Optional) Identify any warning which can precede or occur:

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Does this recall only affect products in certain geographic regions?

No

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Remedy: GM intends to petition NHTSA for an exemption from the notice and remedy provisions of the Federal Motor Vehicle Safety Act.
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Reimbursement Plan:

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Describe what distinguishes the remedy component from the recalled component.

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(Optional) Manufacturer's Comment to NHTSA Staff:

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Planned Owner Notification Begin Date (mm/dd/yyyy):	
Planned Owner Notification End Date (mm/dd/yyyy):	
Manufacturer's identification code for this recall:	N192223240

(Optional) Manufacturer's Comment to NHTSA Staff:

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Part 573 Safety Recall Report

19V-375

Manufacturer Name : General Motors LLC**Submission Date :** MAY 15, 2019**NHTSA Recall No. :** 19V-375**Manufacturer Recall No. :** N192223240**Manufacturer Information :**

Manufacturer Name : General Motors LLC

Address : 29427 Louis Chevrolet Road
MAIL CODE 480-210-2V WARREN MI
48093

Company phone : 586-596-1733

Population :

Number of potentially involved : 726,959

Estimated percentage with defect : 100 %

Vehicle Information :

Vehicle 1 : 2010-2017 GMC Terrain

Vehicle Type :

Body Style :

Power Train : NR

Descriptive Information : Manufacturing records were used to identify affected vehicles.
726,959 GMC Terrain vehicles are affected by this recall.

Production Dates : MAY 21, 2009 - JUL 13, 2017

VIN Range 1 : Begin :

NR

End : NR

 Not sequential**Description of Noncompliance :**

Description of the Noncompliance : General Motors has decided that the lower beam headlamps in 2010-2017 GMC Terrain vehicles fail to conform, in part, to S10.15.6 of Federal Motor Vehicle Safety Standard (FMVSS) No. 108, "Lamps, reflective devices, and associated equipment." A reflection caused by the headlamps' housing can project a narrow beam of light 80 degrees outboard and 45 degrees upward of each lamp's forward-center axis. This can dimly illuminate two small areas high above the vehicle, one to the far left and the other to the far right of the vehicle, outside of the driver's view and not directed in a way that will create glare for oncoming or other surrounding vehicles. When tested, the light emitted from this single point on each lamp may be brighter than the maximum designated in section S10.15.6 and Table XIX of FMVSS 108.

FMVSS 1 : 108 - Lamps, reflective devices, and assoc. Equipment

FMVSS 2 : NR

Description of the Safety Risk : GM believes the risk to motor vehicle safety is inconsequential.

Description of the Cause : The headlamp design allows a narrow beam of light from the lower beam lamp to reflect off of the inner surface of the high beam reflector. The lamps' high beams are not affected by this condition.

Identification of Any Warning NR
that can Occur :

Supplier Identification :

Component Manufacturer

Name : I I Stanley Co., Inc
Address : 1500 Hill-Brady Rd.
Battle Creek MICHIGAN 49037
Country : United States

Chronology :

See attachment

Description of Remedy :

Description of Remedy Program : GM intends to petition NHTSA for an exemption from the notice and remedy provisions of the Federal Motor Vehicle Safety Act.

How Remedy Component Differs from Recalled Component :
Recalled Component Name: Headlamp Asm.
Recalled Component Description: Headlamp Asm.
Recalled Component Part Number: 23319179, 23319180, 23319181, 23319182, 84064624, 84064625, 84064626, 84064627
Recalled Component Country of Origin: US

Identify How/When Recall Condition was Corrected in Production : These vehicles are a prior generation GMC Terrain. The current generation, beginning model year 2018, use a different headlamp design.

Recall Schedule :

Description of Recall Schedule : NR
Planned Dealer Notification Date : NR - NR
Planned Owner Notification Date : NR - NR

* NR - Not Reported