



April 22, 2022

USG 5834

Dr. Steven Cliff
Deputy Administrator
National Highway Traffic Safety Administration
1200 New Jersey Avenue, S.E.
Washington D.C. 20590

Re: General Motors, LLC Petition for Inconsequential Noncompliance
Recall No. 22-00540-27531-10

Dear Deputy Administrator Cliff,

Pursuant to 49 U.S.C. §§ 30118(d) and 30120(h) and 49 C.F.R. Part 556, General Motors LLC (“GM”) submits this petition for determination of inconsequential noncompliance. GM requests it be exempted from the notice and remedy provisions of the National Traffic and Motor Vehicle Safety Act for a noncompliance with Federal Motor Vehicle Safety Standard (FMVSS) No. 108, (Lamps, reflective devices, and associated equipment) on the basis that the noncompliance is inconsequential to motor vehicle safety.

GM is a Delaware Limited Liability Company. In accordance with 49 C.F.R. § 556.4(b)(6), GM has submitted a Noncompliance Information Report to the agency and a copy is attached to this petition.

Background and Description of the Noncompliance

Beginning with Model Year 2018, the daytime running lamps (“DRLs”) used in the headlamp assemblies installed on Chevrolet Tahoe and Suburban vehicles switched from a design that used reduced intensity low beams to a design using light-emitting diodes (“LEDs”). Due to a supplier error that occurred in the course of the change of the design of the DRL, the “DRL” marking was inadvertently omitted from the headlamp lens as required by FMVSS 108, S6.5.2.

That provision states:

Each original equipment and replacement lamp used as a daytime running lamp (DRL), unless optically combined with a headlamp, must be permanently marked “DRL” on its lens in letters not less than 3 mm high.

On March 24, 2022, GM determined that the omission of the “DRL” marking on the lens constituted a technical noncompliance with FMSS 108, S6.5.2. The noncompliance involves 329,344 Model Year 2018 – 2020 Chevrolet Tahoe and Suburban vehicles. A representative example of the DRL location in the affected vehicles is provided below.

general motors

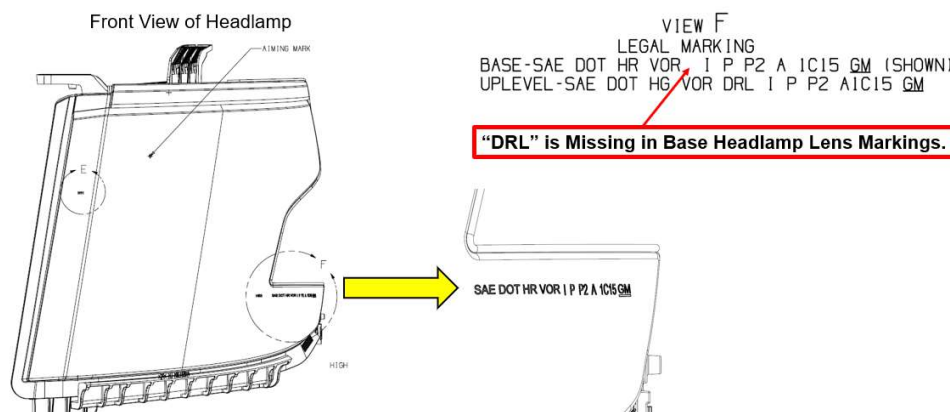
29427 Louis Chevrolet Road / Warren, MI 48093-2350 / www.gm.com

2018-2020 Tahoe and Suburban



The impacted headlamp assemblies and DRLs were not used in production after Model Year 2020 and all service parts within GM's control have been contained and will be reworked to include the appropriate "DRL" marking. Further, dealers have been instructed to return any service parts in their inventory so that they may be reworked to include the appropriate "DRL" marking.

The "DRL" marking is just one item contained within a series of headlamp markings etched into the lens of the subject vehicles. A drawing of the headlamp markings contained within the headlamp assembly, including identifying the location where the "DRL" marking is normally provided on GM vehicles, is shown below. The drawing indicates the location of each of the various markings on the headlamp lens and also provides perspective on their overall size in relation to the entire assembly.



A close-up photograph of the etching of the lens markings on an exemplar headlamp assembly is provided below:



Despite this technical noncompliance, the inadvertent omission of the “DRL” marking on the lens does not lead to an increased risk to motor vehicle safety. The DRLs meet all of the performance requirements for these lamps provided in FMVSS 108 and the headlamp assemblies otherwise contain all of the other required markings. Because there is no safety risk associated with this technical noncompliance, GM requests that it be relieved from the notice and remedy provisions of the Vehicle Safety Act.

Purpose of the “DRL” Marking Provision

The history of how DRLs came to be permitted as optional headlighting equipment in the United States is essential to understanding the purpose of the “DRL” marking provision in S6.5.2. This background also demonstrates why the lack of a “DRL” marking has no bearing on a potential safety risk associated with this noncompliance.

NHTSA considered for many years whether or not to allow the installation of DRLs and to set performance requirements for those lamps. In the late 1980s, NHTSA abandoned a rulemaking to permit the installation of DRLs after finding that it could not identify an associated safety benefit. Several years later in the 1990s, at the request of GM, NHTSA again considered allowing the installation of DRLs. At that time, there existed a patchwork of state motor vehicle laws on vehicle lighting. While no state laws directly prohibited the use of DRLs, some of those laws did have the incidental effect of prohibiting the use of DRLs. For example, certain states required preapproval of any supplemental lighting used in vehicles. In other cases, state traffic laws had the effect of precluding lamps that could be used as DRLs in certain operating environments. Still further, some local jurisdictions mandated the use of headlamps on certain roads 24-hours a day and others were taking steps to mandate or optionally allow for DRLs. (56 Fed. Reg. 38100, 101, August 12, 1991). Because of this patchwork system of state laws, GM considered it to be “virtually impossible” to reconcile the regulations at the state level to set standardized requirements for DRLs.

The “DRL” marking provision was introduced as part of the 1993 final rule updating FMVSS 108 to allow DRLs to be installed as optional lighting equipment. (58 Fed. Reg. 3500, January 11, 1993). As NHTSA considered updating FMVSS 108 to set performance requirements for DRLs, the agency recognized that doing so would, in turn, preempt the laws of those states

which had effectively precluded the use of DRLs. Thus, NHTSA added the “DRL” marking provision as an accommodation to the states. By including the “DRL” mark on lighting that met the FMVSS 108 performance requirements, certain states reasoned that local law enforcement and state vehicle inspection agencies could distinguish between illegal vehicle lamps and lighting combinations and legal lamps that had been certified as meeting the DRL performance requirements. (58 Fed. Reg. at 3504). In essence, the “DRL” mark was implemented as an enforcement tool that aided the states in differentiating DRLs which met the FMVSS 108 performance requirements from other forms of vehicle lighting that otherwise would not have been allowed under state law. (56 Fed. Reg. at 38103). In sum, the fundamental purpose of the “DRL” marking provision was never intended to have any effect on the operation or function of the DRLs; and, accordingly, the absence of the marking does not have an impact on motor vehicle safety.

The Lack of a “DRL” Mark on the Subject Vehicles is Inconsequential to Motor Vehicle Safety

The ability for the states to distinguish between permitted and illegal vehicle headlighting was a relevant concern in the early 1990s. At that time, DRLs were a new technology that was not widely adopted and the patchwork of state motor vehicle lighting laws needed to adapt to the revision of FMVSS 108 to allow DRLs.¹ Today, because of the proliferation of DRLs installed as standard equipment in the U.S. fleet, the “DRL” marking provision does not have the same significance as it did at the time it was first developed. As an example, it is unclear whether state motor vehicle inspection agencies even continue to examine the vehicle lamps for the presence of “DRL” markings on the lens.²

The subject vehicles were produced between May 2017 and April 2020 and have now been in service for between two to nearly five years. At this point, all the affected vehicles registered in states that conduct vehicle inspections that include exterior lighting, have likely undergone at least one state vehicle inspection. GM has checked its relevant databases and has not found any reports from consumers complaining that their vehicles did not pass a state inspection or that

¹ In fact, in the course of the DRL rulemaking, NHTSA recognized that if DRLs were allowed to be installed and the largest domestic manufacturers were to take advantage of that opportunity to equip vehicles with DRLs then “other manufacturers are likely to follow.” This prediction has come true and the installation of DRLs as standard equipment is now widespread. (56 Fed. Reg. 38100, 101, August 12, 1991). GM has installed DRLs as standard equipment on all its U.S. vehicles for over twenty years.

² GM conducted a non-exhaustive review of state motor vehicle inspection laws and protocols. None of the states reviewed referred to a need to inspect for a “DRL” or similar marking on the lens. In some states, the inspector is advised to look for the presence of a “DOT” marking on the headlamps, which the subject vehicles contain. Generally, vehicle inspectors are advised to ensure all headlamps are in good working order, the headlamps are of equal intensity and do not contain any cracks or physical discoloration. (See e.g., Virginia ([available at https://law.lis.virginia.gov/admincode/title19/agency30/chapter70/section510](https://law.lis.virginia.gov/admincode/title19/agency30/chapter70/section510)) (accessed: April 19, 2022)); Texas ([available at https://texreg.sos.state.tx.us/fids/201805366-1.pdf](https://texreg.sos.state.tx.us/fids/201805366-1.pdf) (accessed: April 19, 2022)); Pennsylvania ([available at https://www.dot.state.pa.us/public/dvspubsforms/BMV/BMV%20Manuals/Pub_45%20Inspections%20Regulations/PUB-45.pdf](https://www.dot.state.pa.us/public/dvspubsforms/BMV/BMV%20Manuals/Pub_45%20Inspections%20Regulations/PUB-45.pdf) (accessed: April 19, 2022)); Massachusetts ([available at www.mass.gov/doc/rmv-regulations/download](http://www.mass.gov/doc/rmv-regulations/download) (accessed: April 19, 2022))).

drivers have been cited by local law enforcement because the “DRL” marking was not present. GM has not received any complaints, reports or claims potentially associated with this issue. Further, GM offers the same DRL design in Model Year 2018-2020 Tahoe and Suburban vehicles in Canada where there is no requirement to mark the lens of DRLs with the “DRL” indicia. The lack of a “DRL” marking provision in the Canadian Motor Vehicle Safety Standards reinforces that the marking requirement is an artifact of the piecemeal approach to vehicle lighting regulation in the United States that existed decades ago and has no bearing on motor vehicle safety or the performance of the headlamp system.

There is ample precedent for NHTSA to conclude that the lack of a “DRL” marking on the lens of the subject vehicles does not present an increased risk to motor vehicle safety and to compel the Agency to grant this petition. NHTSA has previously granted inconsequentiality petitions where, like here, the only compliance related issue is that the light source does not meet the associated marking requirements. For example, NHTSA has previously determined that light sources that were mismarked with the incorrect identifier were inconsequential to motor vehicle safety because the light sources otherwise met all of the performance requirements. Key to its analysis in those decisions to grant the inconsequentiality petitions was NHTSA’s determination that inadvertently installing a lamp by following the marking on the light source would not create an enhanced safety risk because the two light sources were interchangeable. (Grant of Petition of Osram Sylvania, 78 FR 22943, April 17, 2003, Grant of Petition of General Motors, 82 Fed. Reg. 5644, January 18, 2017).

Historically, one of NHTSA’s chief concerns related to headlamp marking requirements is that consumers are afforded the necessary information to ensure appropriate replacement lamps can be installed. In the subject vehicles, if the DRL needs to be replaced, there is no risk of installing an incompatible light source. The DRL is a non-replaceable lamp within the headlamp assembly. Should the DRL fail, the whole headlamp assembly will need to be replaced. The “DRL” marking does not and was never intended to communicate any information related to its replacement and does not provide any information to the consumer on the compatible types of replacement light sources. As in the above-referenced petitions, the correct replacement parts for these DRLs can be identified through other means. Consumers, dealers and motor vehicle repair businesses that need to purchase a replacement DRL will obtain an appropriate service part by identifying the vehicle make, model and model year and will not rely on the “DRL” mark to identify the appropriate replacement lamp. (Grant of Petition of Volkswagen Group of America, 82 Fed. Reg. 26733, June 8, 2017, (because consumers and other entities would identify replacement lamps through other means and would “in no way rely upon” the missing voltage marking, “[the noncompliance] poses little if any risk to motor vehicle safety”)).

While in other contexts, NHTSA has reasoned that the absence of a certification label reduces the safety effectiveness of certain items of motor vehicle equipment, the same considerations do not apply here. (*See Denial of Petition of Great Dane*, Docket No. NHTSA-2018-0110, April 18, 2022). In the above-referenced petition, the entire certification label for a Rear Impact Guard was missing. NHTSA explained that the label served as a “indication to consumers, including secondhand purchasers, that the item of equipment provides a minimum level of safety

protection” and that if the Rear Impact Guard were involved in a crash, inspected or replaced, it would not be possible to know the identity of the certifying manufacturer and it could hamper efforts to identify potential safety defect trends. The “DRL” marking serves a fundamentally different purpose. Consumers do not, as a general matter, inspect the headlamp lens for the presence of the mark because, as described above, the “DRL” mark does not communicate any details about the performance of the DRL feature. Also unlike in the example above, if there were a need to track a potential defect trend related to the DRLs in the subject vehicles, that information would be conveyed through other sources of information such as the vehicle VIN or headlamp assembly part number, not through a “DRL” mark. (Grant of Petition of Porsche Cars North America, Inc., 86 Fed. Reg. 184, January 4, 2021, (granting petition where tires did not include “DOT” certification mark given that the affected tires complied with the relevant FMVSS and contained a vehicle level certification label)).

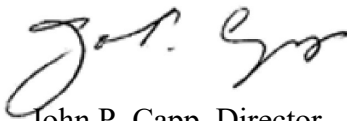
All the DRLs, including those used as service parts, meet the FMVSS 108 performance requirements. With this petition, GM is providing documentation that confirms that the DRLs have been certified by the supplier as meeting all requisite performance requirements of the Vehicle Safety Act.³ Finally, the subject vehicles have a vehicle level certification of compliance which includes the complete headlamp assembly.

Conclusion

For the above reasons and because the lack of a “DRL” marking on the daytime running lamps does not lead to an increased safety risk in the subject vehicles, GM petitions to be exempted from the recall and remedy provisions of the Safety Act for this noncompliance.

Please feel free to contact me or Matthew Jerinsky of our Washington, D.C. office (at matthew.jerinsky@gm.com) with any questions you might have.

Sincerely,



John P. Capp, Director
Vehicle Safety Technology, Strategy, & Regulations
Global Products Safety & Systems

Enclosures

³ GM is attaching a copy of the lighting supplier’s attestation that the DRLs meet all the performance specifications contained within FMVSS 108.



General Motors, LLC

Vehicle Report

Transaction ID: 22-00540-27531-10 (Original Report)

Required fields indicated with *

Your report has been submitted. Your Transaction No. is 22-00540-27531-10.

Manufacturer: General Motors, LLC

29427 Louis Chevrolet Road
 WARREN MI 48093

Ron Tedesco Recalls Primary
 586-879-4213,

This is a Noncompliance Report. Filing a petition pursuant to [49 CFR 556](#)

Vehicle Information

Chevrolet Suburban 2018 - 2020

* Model Yr. Start: 2018	* Model Yr. End: 2020	Type:
* Make: Chevrolet		Body Style:
* Model: Suburban		Powertrain:
Production Dates	Begin: 05/22/2017 End: 04/02/2020	Descriptive Information: Manufacturing records were used to identify potentially affected vehicles built with base-level headlamps. Vehicles with high intensity discharge (HID) headlamps (RPO T4F) are not included in this recall. There are 113,448 Chevrolet Suburban vehicles included in this recall.
VIN Range(s):	Begin: End:	

Chevrolet Tahoe 2018 - 2020

* Model Yr. Start: 2018	* Model Yr. End: 2020	Type:
* Make: Chevrolet		Body Style:
* Model: Tahoe		Powertrain:
Production Dates	Begin: 05/22/2017 End: 04/08/2020	Descriptive Information: Manufacturing records were used to identify potentially affected vehicles built with base-level headlamps. Vehicles with high intensity discharge (HID) headlamps (RPO T4F) are not included in this recall. There are 215,896 Chevrolet Tahoe vehicles included in this recall.
VIN Range(s):	Begin: End:	

Number potentially involved: 329344 Estimated percentage of involved with defect: 100%

Defect / Noncompliance Description

For this Defect/Noncompliance:

* Describe the defect or noncompliance:

General Motors has decided that certain 2018-2020 model-year Chevrolet Suburban and Tahoe vehicles fail to conform to 56.5.2 of Federal Motor Vehicle Safety Standard (FMVSS) No. 108, "Lamps, reflective devices, and associated equipment." The headlamp lens markings on these vehicles do not include the letters "DRL" to indicate that there is a daytime running lamp (DRL) function in the headlamp assembly that is not optically combined with a headlamp function.

If a noncompliance, provide the applicable FMVSS:

If applicable, provide any further FMVSS affected:

Describe the cause:

GM's headlamp supplier did not update the lens markings when functional changes were made to the DRLs beginning with the 2018 model year.

* Describe the safety risk:

This condition has no impact to vehicle safety and GM intends to submit an inconsequentiality petition to NHTSA under 49 CFR part 556.

Identify any warning which can precede or occur:

This Recall affects all vehicles.

If applicable, identify the manufacturer of the defective or noncompliant component. If the manufacturer of the component is unknown, provide the information for the company that supplied the subject component.

Component manufacturer

Company Information		Company Contact Information	
Company Name:	Decofinmex, S.A. de C.V.	First Name:	Alan
Country:	Mexico	Last Name:	Correa
Address 1:	Av. Uniones #3 Parque Industrial FINSA	Position:	Plant Program Manager
Address 2:		Email:	alan.correa@magna.com
City:	Matamoros, Tamaulipas	Phone:	528681231044
State:	FOREIGN STATES		
Zip/Postal Code:	87316		

Involved Components

If the defect or noncompliance involves a specific component(s), identify that component(s) below.

Component Name:	HEADLAMP ASM-FRT
Component Description:	2018 Headlamp Assembly
Component Part Number:	84166416-417, 84166452-453, 84294342-343, 84294347-348
Component Name:	HEADLAMP ASM-FRT
Component Description:	2019-2020 Headlamp Assembly
Component Part Number:	84582571-574, 84582599-600, 84582607-608

Chronology of Defect / Noncompliance Determination

Provide the chronology of events leading up to the defect decision or test data for the noncompliance decision.:
 On January 28, 2022, a GM engineer contacted GM's headlamp supplier about the accuracy of certain headlamp drawings that did not include the DRL marking on the lens and to confirm whether the headlamps produced by the supplier were correctly marked. The supplier confirmed that the DRL marking should have been included on the drawing and that the headlamps did not include the DRL marking on the lens. On February 14, 2022, the GM engineer submitted a report to GM's Speak Up For Safety (SUFSS) program. GM opened a formal investigation on March 1, 2022. GM's investigator identified the potentially affected population and found no relevant field complaints. On March 24, 2022, GM's Safety and Field Action Decision Authority (SFADA) decided that the condition presented a technical noncompliance to FMVSS 108.

Identify the Remedy

Describe the defect/noncompliance remedy program, including the manufacturer's plan for reimbursement.
 GM intends to petition NHTSA for an exemption from the notice and remedy provisions of the Federal Motor Vehicle Safety Act.

Describe what distinguishes the remedy component from the recalled component.

Identify and describe how and when the recall condition was corrected in production.
 These parts were not used after 2020 model year. Service parts currently in GM control have been contained and will be reworked to include the appropriate DRL marking. GM will request dealers return non-compliant parts in their inventory to also be reworked to include the DRL marking.

Identify the Recall Schedule

Describe the recall schedule for notifications.:	Planned Dealer Notification Begin Date:
	Planned Dealer Notification End Date:
	Planned Owner Notification Begin Date:
	Planned Owner Notification End Date:
Manufacturer's identification code for this recall (if applicable):	N222361270

Please be reminded that owner notification letters must be mailed no more than 60 days from submission of this report.

Manufacturer Comments to NHTSA Staff

Document Upload

There are 0 documents associated with this report.



Thursday, January 12, 2017

To: Samir Kadkade

From: Antonio Araujo - Quality Manager, MAGNA DECOFINMEX

Subject: 2018 K2UC/YC Chevy Base Headlamp, 2018 K2UC/YC Chevy Up Level Headlamp.

MVSS108 Certification

This letter certifies that the following lamps provided by Decofinmex SA de CV division of Magna Closures for use on the 2018 K2UC/YC Chevy Base Headlamp, 2018 K2UC/YC Chevy Up Level Headlamp are in compliance with the sections of FMVSS108 (revised 02/08/2016) and CMVSS108 TSD (revised 07/09/2011) and CMVSS108 SOR (revised 01/30/2015) as listed on the attached sheet(s) for the functions checked below. This includes:

<u>Part Number</u>	<u>Description</u>	<u>Revision Level</u>
23490005	K2UC/YC - CHEVY HL BASE LH	019
23490006	K2UC/YC - CHEVY HL BASE RH	019
84125340	K2UC/YC - CHEVY HL UPLEVEL LH	019
84125341	K2UC/YC - CHEVY HL UPLEVEL RH	019

- Front Turn Signal Lamp (FMVSS108 §7.1.1, CMVSS)
- Rear Turn Signal Lamp (FMVSS108 §7.1.2, CMVSS)
- Tail Lamp (FMVSS108 §7.2, CMVSS)
- Stop Lamp (FMVSS108 §7.3, CMVSS)
- Front Side Marker Lamp (FMVSS108 §7.4, CMVSS)
- Rear Side Marker Lamp (FMVSS108 §7.4, CMVSS)
- Identification Lamp (FMVSS108 §7.5, CMVSS)
- Clearance Lamp (FMVSS108 §7.5, CMVSS)
- Backup lamp (FMVSS108 §7.6, CMVSS)
- License Lamp (FMVSS108 §7.7, CMVSS)
- Parking Lamp (FMVSS108 §7.8, CMVSS)
- CHMSL (FMVSS108 §7.9, CMVSS)
- Daytime Running Lamp (FMVSS§7.10, CMVSS§20)
- Front Side Reflex Reflector (FMVSS108 §8, CMVSS)
- Rear Side Reflex Reflector (FMVSS108 §8, CMVSS)
- Rear Reflex Reflector (FMVSS108 §8, CMVSS)
- Headlamp Systems (FMVSS108 §10, CMVSS)
- Replaceable Light Source (FMVSS108 §11, CMVSS)
- Headlamp Concealment (FMVSS108 §12, CMVSS)
- Replaceable Headlamp Lens (FMVSS108 §13, CMVSS)
- Fog Lamp (CMVSS)

Test reports, analysis, and calculations indicating compliance are on file in our Matamoros, Mx facility under report R16-3178 and R16-3179, are available for inspection upon request and have been provided to GM Validation Engineering. Please direct any questions regarding MVSS108 compliance to Eladio Martinez Carrizales, Laboratory Supervisor, (956) 547-5643, eladio.martinez@magna.com

X  RA.
 Ramon Antonio Araujo Paz
 Quality Manager

USG 5834
Letter to Deputy Director Cliff
22-00540-27531-10
April 22, 2022

Subject: 2018 K2UC/YC Chevy Base Headlamp, 2018 K2UC/YC Chevy Up Level Headlamp.														
FMVSS108 Section Number	Small Lamp or Reflective Device Function													
	Front Turn Signal Lamp §7.1.1	Rear Turn Signal Lamp §7.1.2	Tail Lamp §7.2	Stop Lamp §7.3	Side Marker Lamp §7.4	Identification Lamp §7.5	Clearance Lamp §7.5	Backup lamp §7.6	License Lamp §7.7	Parking Lamp §7.8	CHMSL §7.9	Daytime Running Lamp §7.10	Front Side Reflex Reflector §8.1	
§____.2 Color of light	x	n/a	n/a	n/a	x	n/a	n/a	n/a	n/a	x	n/a	x	x	
§____.6 Effective area	x	n/a	no requirement	n/a	no requirement	no requirement	no requirement	no requirement	no requirement	no requirement	n/a	no requirement	no requirement	
§____.7 Visibility per §6.4	48.4 in. (48.4.3)(i)	n/a	n/a	n/a	no requirement	no requirement	no requirement	n/a	no requirement	48.4 in. (48.4.3)(i)	n/a	no requirement	no requirement	
§____.9 Markings per §6.5	x	n/a	n/a	n/a	x	n/a	n/a	n/a	n/a	x	n/a	x	x	
§____.10.1 Spacing: Max Intensity Multiplier	x	no requirement	no requirement	no requirement	no requirement	no requirement	no requirement	no requirement	no requirement	no requirement	no requirement	10.1(a)	no requirement	
§____.10.2 or §____.10.3 Spacing Measurement; Type	§____.10.3	no requirement	no requirement	no requirement	no requirement	no requirement	no requirement	no requirement	no requirement	no requirement	no requirement	no requirement	no requirement	
§____.10.4 Spacing: Multiplier	(a)	no requirement	no requirement	no requirement	no requirement	no requirement	no requirement	no requirement	no requirement	no requirement	no requirement	no requirement	no requirement	
§____.11.1 Multiple Compartment per §6.1.3.2	n/a	n/a	n/a	n/a	no requirement	no requirement	no requirement	no requirement	no requirement	no requirement	no requirement	no requirement	no requirement	
§____.11.2 or §____.11.3 Multiple Compartment; Dimensions	n/a	n/a	n/a	n/a	no requirement	no requirement	no requirement	no requirement	no requirement	no requirement	no requirement	no requirement	no requirement	
§____.11.4 Multiple Compartment; ≥2032mm	n/a	n/a	n/a	n/a	no requirement	no requirement	no requirement	no requirement	no requirement	no requirement	no requirement	no requirement	no requirement	
§____.12.1 Ratio; intensity multiplier	n/a	n/a	reference §7.2.2 or §7.1.2	n/a	no requirement	no requirement	reference §7.1.1 or §7.1.2	no requirement	no requirement	reference §7.1.1 or §7.1.2	no requirement	no requirement	no requirement	
§____.12.2 or §____.12.3 Multiple Compartment; Dimensions	n/a	n/a	reference §7.2.2 or §7.1.2	n/a	no requirement	no requirement	reference §7.1.1 or §7.1.2	no requirement	no requirement	reference §7.1.1 or §7.1.2	no requirement	no requirement	no requirement	
§____.12.4 Ratio; below horizontal	n/a	n/a	reference §7.2.2 or §7.1.2	n/a	no requirement	no requirement	no requirement	no requirement	no requirement	reference §7.1.1 or §7.1.2	no requirement	no requirement	no requirement	
§____.13 Photometry	x	n/a	n/a	n/a	x	n/a	n/a	n/a	n/a	x	n/a	x	no requirement	
§____.14 Physical Test	x	n/a	n/a	n/a	x	n/a	n/a	n/a	n/a	x	n/a	x	no requirement	
§____.15 Indexing/Installation	no requirement	no requirement	no requirement	n/a	no requirement	no requirement	no requirement	no requirement	n/a	no requirement	no requirement	no requirement	no requirement	
§7.1.3 Combined Lamp Indexing-Turn	n/a	n/a	no requirement	no requirement	no requirement	no requirement	no requirement	no requirement	no requirement	no requirement	no requirement	no requirement	no requirement	
§6.1.3.2 Multiple Compartment Lamps	no requirement	n/a	n/a	n/a	no requirement	no requirement	no requirement	no requirement	no requirement	no requirement	no requirement	no requirement	no requirement	
§6.2.1 Impairment(Additional Lamps, etc.)	x	n/a	n/a	n/a	x	n/a	n/a	n/a	n/a	x	n/a	x	x	
§6.3.1-3 Equipment Combinations	no requirement	no requirement	no requirement	no requirement	no requirement	no requirement	n/a	no requirement	no requirement	no requirement	n/a	no requirement	no requirement	
§8.1.11 Reflex Photometry	no requirement	no requirement	no requirement	no requirement	no requirement	no requirement	no requirement	no requirement	no requirement	no requirement	no requirement	no requirement	x	
§8.1.12 Reflex Physical Test	no requirement	no requirement	no requirement	no requirement	no requirement	no requirement	no requirement	no requirement	no requirement	no requirement	no requirement	no requirement	x	
§8.1.13 Alternative Side Reflex	no requirement	no requirement	no requirement	no requirement	no requirement	no requirement	no requirement	no requirement	no requirement	no requirement	no requirement	no requirement	n/a	
FMVSS108 Section Number	Front Turn Signal Lamp	Rear Turn Signal Lamp	Tail Lamp	Stop Lamp	Side Marker Lamp	Identification Lamp	Clearance Lamp	Backup Lamp	License Lamp	Parking Lamp	CHMSL	Daytime Running Lamp	Front Side Reflex Reflector	

NOTE: This compliance summary does not include all regulatory requirements for truck tractor and trailer lighting.

Supplier Compliance Letter: Headlamp System and Types

FMVSS108 (rev 02/08/2016)

Subject: 2018 K2UC/YC Chevy Base Headlamp, 2018 K2UC/YC Chevy Up Level Headlamp.						
FMVSS108 Section Number	Headlamp System and Types				FMVSS108 Section Number	Headlamp Aimability §10.18
	Headlamp Systems §10.	Replaceable Light Source §11.	Headlamp Concealment §12.	Replaceable Headlamp Lens §13.		
§____.1 System req.	x	no requirement	no requirement	no requirement	§____.1 (.1-.2) Mounting and Aiming	x
§____.2 Aiming req. per §10.18	x	no requirement	no requirement	no requirement	§____.2 Aiming Systems	x
§____.4 Color of light	x	no requirement	no requirement	no requirement	§____.3 Aim Adjustment Interaction	x
§____.8 Effective area	no requirement	no requirement	no requirement	no requirement	§____.3.1 Label (non-compliance to §____.3)	n/a
§____.11 Markings per §6.5	x	no requirement	no requirement	no requirement	§____.4 Horizontal Adjust - Visual Aim	x
§____.12 Spacing per §6.1.3.5	n/a	no requirement	no requirement	no requirement	§____.5.1 Optical Axis Marking - Vehicle	x
§____.13 Sealed Beam	n/a	no requirement	no requirement	no requirement	§____.5.2 or §____.5.3 Optical Axis Marking - Lamp	§10.18.5.3
§____.14.1 Integral Beam-Installation	n/a	no requirement	no requirement	no requirement	§____.6 Moveable Reflector	x
§____.14.2 (.1-.2) Integral Beam-Aimability	n/a	no requirement	no requirement	no requirement	§____.7 External Aiming	n/a
§____.14.3 Integral Beam-Simultaneous Aim	n/a	no requirement	no requirement	no requirement	§____.7.1 Locating Plates	n/a
§____.14.4 Integral Beam-Markings	n/a	no requirement	no requirement	no requirement	§____.7.2 Non-adjustable Locating Plates	n/a
§____.14.5 Integral Beam-Additional Sources	n/a	no requirement	no requirement	no requirement	§____.8 On Vehicle Requirements	n/a
§____.14.6 Integral Beam-Photometry	n/a	no requirement	no requirement	no requirement	§____.9 Visual/Optical Requirements	x
§____.14.7 (.1-8) Integral Beam-Physical Tests	n/a	no requirement	no requirement	no requirement		
§____.15 (.1-.7) Replaceable Bulb	x	no requirement	no requirement	no requirement		
§____.16(.1-.3) Combination Headlamp	n/a	no requirement	no requirement	no requirement		
§____.18 Aimability	SEE TABLE →	no requirement	no requirement	no requirement		
§____.1 Markings	no requirement	x	no requirement	no requirement		
§____.2 Ballast Markings	no requirement	n/a	no requirement	no requirement		
§____.3 Gas Discharge Life	no requirement	n/a	no requirement	no requirement		
§____.4 Physical Test	no requirement	x	no requirement	no requirement		
§____.1 thru .5 North American Req.	no requirement	no requirement	n/a	no requirement		
§____.6 ECE Req. Option	no requirement	no requirement	n/a	no requirement		
§____.1 thru .3 Requirements	no requirement	no requirement	no requirement	n/a		
§6.2.1 Impairment(Additional Lamps, etc.)	n/a					
§6.2.3.2 Headlamp Wiper Photometry	n/a					

Supplier Compliance Letter: Lighting System Components and Retroreflective Devices
 Subject: 2018 KZUC/YC Chevy Base Headlamp, 2018 KZUC/YC Chevy Up Level Headlamp.

CMVSS108 TSD(rev 07/09/2015) and SOR(rev 1/30/15)

CMVSS108 Section Number	Headlamp System Alternative Requirements	Daytime Running Lamp	Lighting System Components and Retroreflective Devices §108.				
			select lamp type from list - lamp description on next tab must be populated				
§108.1(1) Alternate ECE certification for RH Rule of road	N/A	no requirement	no requirement	no requirement	no requirement	no requirement	no requirement
§108.1(3) Alternate SAE J578 Compliance	N/A	no requirement	no requirement	no requirement	no requirement	no requirement	no requirement
§108.1(4) Exception to ECE Type Approval: specific req.	N/A	no requirement	no requirement	no requirement	no requirement	no requirement	no requirement
§108.1(5) Intensity requirement (225,000cd)	N/A	no requirement	no requirement	no requirement	no requirement	no requirement	no requirement
§108.1(6) Headlamp wipers; Plastic lens	N/A	no requirement	no requirement	no requirement	no requirement	no requirement	no requirement
§____(3) TSD108 compliance	X	X					
§____(4) SAE accepted requirements	X	X					
§____(5) Bulb & Sealed Beam requirements	X	X					
§____(8) Combined lamp requirements	no requirement	X					
§____(10) Performance std. for reflective devices	no requirement	no requirement					
§____(20) DRL Requirements - Section (44) to (65)	no requirement	X	no requirement	no requirement	no requirement	no requirement	no requirement
§____(25) Marking	X	no requirement	no requirement	no requirement	no requirement	no requirement	no requirement
§____(29) Aiming mechanism (Headlamp & Front Fog)	X	no requirement					
§____(30) Retaining ring (Headlamp & Front Fog)	N/A	no requirement					
§____(31) Sealed beam headlamp; plastic lenses	N/A	no requirement					
§____(33) HB Type marking (Headlamps)	X	no requirement					
§____(40) Aiming (Front Fog & Auxiliary)	no requirement	no requirement					
§____(41) Torque Deflection (Headlamp)	N/A	no requirement					
§____(42) Labels - language	N/A	no requirement					
§____(44) Number of equipment	no requirement	no requirement	no requirement	no requirement	no requirement	no requirement	no requirement
§____(45) Color	N/A	X	no requirement	no requirement	no requirement	no requirement	no requirement
§____(46) Physical Test	N/A	N/A	no requirement	no requirement	no requirement	no requirement	no requirement
§____(47) SAE J2087: Photometric and Effective Area	N/A	X	no requirement	no requirement	no requirement	no requirement	no requirement
§____(48) Luminous intensity and voltage regulation	N/A	X	no requirement	no requirement	no requirement	no requirement	no requirement
§____(49) Optically Combined w/ HL: Photometry	N/A	X	no requirement	no requirement	no requirement	no requirement	no requirement
§____(50) Optically Combined, 2 filaments: Photometry	N/A	N/A	no requirement	no requirement	no requirement	no requirement	no requirement
§____(51) Optically Combined w/ Concealed Lamp, Photometry	N/A	N/A	no requirement	no requirement	no requirement	no requirement	no requirement
§____(52) Optically Combined w/ Front Fog Lamp, Photometry	N/A	N/A	no requirement	no requirement	no requirement	no requirement	no requirement
§____(53) Alternate CAN/CSA-D603-88, DRL requirement Systems Combined w/ Front Fog Lamp, Photometry	N/A	N/A	no requirement	no requirement	no requirement	no requirement	no requirement
§____(61) Visibility - height, not optically combined	N/A	N/A	no requirement	no requirement	no requirement	no requirement	no requirement
§____(62) Visibility	N/A	X	no requirement	no requirement	no requirement	no requirement	no requirement
§____(63) Visibility - distance to turn signal lamp	N/A	X	no requirement	no requirement	no requirement	no requirement	no requirement
§____(64) Visibility - cleaning accessibility	N/A	N/A	no requirement	no requirement	no requirement	no requirement	no requirement
§____(65) Visibility - TSD108 SS.1.3 & SS.3.1.1	N/A	X	no requirement	no requirement	no requirement	no requirement	no requirement

Part 573 Safety Recall Report

22V-211

Manufacturer Name : General Motors, LLC**Submission Date :** MAR 31, 2022**NHTSA Recall No. :** 22V-211**Manufacturer Recall No. :** N222361270**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 : 329,344

Estimated percentage with defect : 100 %

Vehicle Information :

Vehicle 1 : 2018-2020 Chevrolet Suburban

Vehicle Type :

Body Style :

Power Train : NR

Descriptive Information : Manufacturing records were used to identify potentially affected vehicles built with base-level headlamps.

Vehicles with high intensity discharge (HID) headlamps (RPO T4F) are not included in this recall.

There are 113,448 Chevrolet Suburban vehicles included in this recall.

Production Dates : MAY 22, 2017 - APR 02, 2020

VIN Range 1 : Begin :

NR

End : NR

 Not sequential

Vehicle 2 : 2018-2020 Chevrolet Tahoe

Vehicle Type :

Body Style :

Power Train : NR

Descriptive Information : Manufacturing records were used to identify potentially affected vehicles built with base-level headlamps.

Vehicles with high intensity discharge (HID) headlamps (RPO T4F) are not included in this recall.

There are 215,896 Chevrolet Tahoe vehicles included in this recall.

Production Dates : MAY 22, 2017 - APR 08, 2020

VIN Range 1 : Begin :

NR

End : NR

 Not sequential

Description of Noncompliance :

Description of the Noncompliance : General Motors has decided that certain 2018-2020 model-year Chevrolet Suburban and Tahoe vehicles fail to conform to S6.5.2 of Federal Motor Vehicle Safety Standard (FMVSS) No. 108, "Lamps, reflective devices, and associated equipment." The headlamp lens markings on these vehicles do not include the letters "DRL" to indicate that there is a daytime running lamp (DRL) function in the headlamp assembly that is not optically combined with a headlamp function.

FMVSS 1 : NR

FMVSS 2 : NR

Description of the Safety Risk : This condition has no impact to vehicle safety and GM intends to submit an inconsequentiality petition to NHTSA under 49 CFR part 556.

Description of the Cause : GM's headlamp supplier did not update the lens markings when functional changes were made to the DRLs beginning with the 2018 model year.

Identification of Any Warning that can Occur : NR

Involved Components :

Component Name 1 : HEADLAMP ASM-FRT

Component Description : 2018 Headlamp Assembly

Component Part Number : 84166416-417, 84166452-453, 84294342-343, 84294347-348

Component Name 2 : HEADLAMP ASM-FRT

Component Description : 2019-2020 Headlamp Assembly

Component Part Number : 84582571-574, 84582599-600, 84582607-608

Supplier Identification :**Component Manufacturer**

Name : Decofinmex, S.A. de C.V.

Address : Av. Uniones #3 Parque Industrial FINSA
Matamoros, Tamaulipas Foreign States 87316

Country : Mexico

Chronology :

On January 28, 2022, a GM engineer contacted GM's headlamp supplier about the accuracy of certain headlamp drawings that did not include the DRL marking on the lens and to confirm whether the headlamps produced by the supplier were correctly marked. The supplier confirmed that the DRL marking should have been included on the drawing and that the headlamps did not include the DRL marking on the lens.

On February 14, 2022, the GM engineer submitted a report to GM's Speak Up For Safety (SUFS) program. GM opened a formal investigation on March 1, 2022. GM's investigator identified the potentially affected population and found no relevant field complaints. On March 24, 2022, GM's Safety and Field Action Decision Authority (SFADA) decided that the condition presented a technical noncompliance to FMVSS 108.

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 : NR

Identify How/When Recall Condition was Corrected in Production : These parts were not used after 2020 model year. Service parts currently in GM control have been contained and will be reworked to include the appropriate DRL marking. GM will request dealers return non-compliant parts in their inventory to also be reworked to include the DRL marking.

Recall Schedule :

Description of Recall Schedule : NR

Planned Dealer Notification Date : NR - NR

Planned Owner Notification Date : NR - NR

* NR - Not Reported