REPORT TO BOARD OF DIRECTORS OF
GENERAL MOTORS COMPANY
REGARDING IGNITION SWITCH RECALLS

May 29, 2014

Anton R. Valukas

JENNER & BLOCK

Privileged and Confidential:
Protected by Attorney-Client Privilege and as Attorney Work Product
committees GM had created to consider changes in production vehicles – the CPIT and VAPIR committees. VAPIR (Vehicle and Process Integration Review), by design, includes a cross-section of Vehicle System Engineers because they are supposed to be able to recognize whether an issue impacts other functions within the vehicle.\textsuperscript{256}

Prior to beginning committee meetings to consider possible solutions, GM personnel did take one step to identify the problem for dealers (not consumers). In February 2005, GM issued a Preliminary Information, a communication that GM sends to dealers (but not consumers) about a possible issue, even if there is not yet a resolution to the issue.\textsuperscript{257} The Preliminary Information explained the potential for drivers to inadvertently turn off the ignition, explained the cause to be the low torque of the Ignition Switch, and specifically noted the potential for a “stall.”\textsuperscript{258} The Preliminary Information explained that “[t]he customer should be advised of this potential and to take steps, such as removing unessential items from their key chain, to prevent it.”\textsuperscript{259}

By March 2005, the engineers were ready to present proposed solutions in presentations to the CPIT and the VAPIR. A presentation provided to the VAPIR on March 1, 2005 listed two possible “Best Solutions,” yet neither involved improving the Ignition Switch itself.\textsuperscript{260}

\textsuperscript{256} J&B Interview of Lori Queen, May 12, 2014.
\textsuperscript{257} J&B Interview of Mickey Sabol, April 24, 2014; J&B Interview of Steven Oakley, April 23, 2014.
\textsuperscript{258} Preliminary Information, Engine Stalls, Loss of Electrical Systems, and No DTCs (Feb. 28, 2005) [DOC ID 000000000067; GMNHTSA000272962].
\textsuperscript{259} Preliminary Information, Engine Stalls, Loss of Electrical Systems, and No DTCs (Feb. 28, 2005) [DOC ID 000000000067; GMNHTSA000272962].
\textsuperscript{260} PRTS N172404 (Nov. 19, 2004), attaching CMX001 Lock Module Detent in RUN Presentation, at 9 [DOC ID 000001771143; GMNHTSA000142658].