

Analysis of Proposed Consent Order to Aid Public Comment  
In the Matter of General Motors LLC, General Motors Holdings LLC, and OnStar, LLC  
File No. 2423052



**Provision X** provides consumers the ability to fully opt out of collection of all data with narrow exclusions for consumer-initiated communication, safety, and over-the-air updates. This provision is unique to the Proposed Order.

**Provision XI** prohibits Respondents from misrepresenting information regarding their collection, use, sharing, and deletion of consumers' geolocation and driver behavior data.

**Provisions XII-XV** are reporting and compliance provisions, which include recordkeeping requirements and provisions requiring Respondents to provide information or documents necessary for the Commission to monitor compliance.

**Provision XVI** states that the Proposed Order will remain in effect for 20 years, with certain exceptions.

The purpose of this analysis is to facilitate public comment on the Proposed Order, and it is not intended to constitute an official interpretation of the complaint or Proposed Order, or to modify the Proposed Order's terms in any way.