



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

AUG 26 2003

400 Seventh Street, S.W.  
Washington, D.C. 20590

**CERTIFIED MAIL**  
**RETURN RECEIPT REQUESTED**

Stephen J. Speth, Director  
Vehicle Compliance and Safety Affairs  
DaimlerChrysler Corporation  
800 Chrysler Drive - CIMS 482-00-91  
Auburn Hills, MI 48326-2757

NVS-213cla  
EA03-004

Dear Mr. Speth:

The Office of Defects Investigation (ODI) is conducting an investigation (EA03-004) of alleged wheel stud fracture and potential wheel separation in model year (MY) 1997 through 2000 Ford Windstar vehicles. To assist us with this investigation, we are requesting information concerning wheel separation in certain peer minivans.

ODI conducts investigations of potential safety defects in motor vehicles and items of motor vehicle equipment under the authority of the National Traffic and Motor Vehicle Safety Act of 1966, as amended, 49 U.S.C. Chapter 301 (49 U.S.C. § 30166). The purpose of these investigations is to determine whether there is a need for the National Highway Traffic Safety Administration (NHTSA) to order manufacturers to conduct defect notification and recall campaigns to reduce the potential for crashes, injuries and deaths, in accordance with 49 U.S.C. § 30118.

Unless otherwise stated in the text, the following definitions apply to this information request:

- **Subject peer vehicles:** All MY 1997 through 2003 DaimlerChrysler Voyager, Caravan, and Town&Country minivans manufactured by for sale or lease in the United States.
- **Alleged defect:** Wheel stud fracture.
- **DaimlerChrysler:** DaimlerChrysler Corporation and all of its past and present officers and employees, whether assigned to its principal offices or any of its field or other locations, including all of its divisions, subsidiaries (whether or not incorporated) and affiliated enterprises and all of their headquarters, regional, zone and other offices and their employees, and all agents, contractors, consultants, attorneys and law firms and other persons engaged directly or indirectly (e.g., employee of a consultant) by or under



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1-888-DASH-2-DOT

the control of (including all business units and persons previously referred to), who are or, in or after January 1, 1996, were involved in any way with any of the following related to the alleged defect in the subject vehicles: design, engineering, analysis, modification or production (e.g. quality control); testing, assessment or evaluation; consideration, or recognition of potential or actual defects, reporting, record-keeping and information management, (e.g., complaints, field reports, warranty information, part sales), analysis, claims, or lawsuits; or communication to, from or intended for zone representatives, fleets, dealers, or other field locations, including, but not limited to people who have the capacity to obtain information from dealers.

- **Document:** "Document(s)" is used in the broadest sense of the word and shall mean all original written, printed, typed, recorded, or graphic matter whatsoever, however produced or reproduced, of every kind, nature, and description, and all non-identical copies of both sides thereof, including, but not limited to, papers, letters, memoranda, correspondence, communications, electronic mail (e-mail) messages (existing in hard copy and/or in electronic storage), faxes, mailgrams, telegrams, cables, telex messages, notes, annotations, working papers, drafts, minutes, records, audio and video recordings, data, databases, other information bases, summaries, charts, tables, graphics, other visual displays, photographs, statements, interviews, opinions, reports, newspaper articles, studies, analyses, evaluations, interpretations, contracts, agreements, jottings, agendas, bulletins, notices, announcements, instructions, blueprints, drawings, as-builts, changes, manuals, publications, work schedules, journals, statistical data, desk, portable and computer calendars, appointment books, diaries, travel reports, lists, tabulations, computer printouts, data processing program libraries, data processing inputs and outputs, microfilms, microfiches, statements for services, resolutions, financial statements, governmental records, business records, personnel records, work orders, pleadings, discovery in any form, affidavits, motions, responses to discovery, all transcripts, administrative filings and all mechanical, magnetic, photographic and electronic records or recordings of any kind, including any storage media associated with computers, including, but not limited to, information on hard drives, floppy disks, backup tapes, and zip drives, electronic communications, including but not limited to, the Internet and shall include any drafts or revisions pertaining to any of the foregoing, all other things similar to any of the foregoing, however denominated by DAIMLERCHRYSLER, any other data compilations from which information can be obtained, translated if necessary, into a usable form and any other documents. For purposes of this request, any document, which contains any note, comment, addition, deletion, insertion, annotation, or otherwise comprises a non-identical copy of another document shall be treated as a separate document subject to production. In all cases where original and any non-identical copies are not available, "document(s)" also means any identical copies of the original and all non-identical copies thereof. Any document, record, graph, chart, film or photograph originally produced in color must be provided in color. Furnish all documents whether verified by the manufacturer or not. If a document is not in the English language, provide both the original document and an English translation of the document.

In order for my staff to evaluate the alleged defect in Ford Windstar vehicles, we are requesting information pertaining to the following DaimlerChrysler vehicles; Voyager, Caravan, and Town&Country. Pursuant to 49 U.S.C. § 30166, please provide numbered responses to the following information requests. Please repeat the applicable request verbatim above each response. After the response to each request, identify the source of the information and indicate the last date the source updated the information prior to the preparation of the response. Insofar as has previously provided a document to ODI, may either produce it again, or identify the document, the document submission to ODI in which it was included and the precise location in that submission where the document is located. When documents are produced, the documents shall be produced in an identified, organized manner that corresponds with the Information Request letter (including the subparts). When documents are produced and the documents would not, standing alone, be self-explanatory, the production of documents shall be supplemented and accompanied by explanation.

1. State by model, wheel type, and model year, the number of peer vehicles DaimlerChrysler has manufactured for sale or lease in the United States. Separately, for each peer vehicle manufactured to date by DaimlerChrysler, state the following:
  - a. Vehicle identification number (VIN);
  - b. Wheel type;
  - c. Model Year;
  - d. Date of manufacture;
  - e. Date warranty coverage commenced; and
  - f. The State in the United States where the vehicle was originally sold or leased (or delivered for sale or lease).

Provide the table in Microsoft Access 2000, or a compatible format, entitled "PRODUCTION DATA." See Enclosure, Data Collection Disc, for a pre-formatted table that provides further details regarding this submission.

2. State the number of each of the following, received by DaimlerChrysler, or of which DaimlerChrysler is otherwise aware for the peer vehicles, which relate to, or may relate to, the alleged defect in the subject vehicles:
  - a. Consumer complaints, including those from fleet operators;
  - b. Field reports, including dealer field reports;
  - c. Reports involving a crash, injury, or fatality, based on claims against the manufacturer involving a death or injury, notices received by the manufacturer alleging or proving that a death or injury was caused by the alleged defect in a subject vehicle, property damage claims, consumer complaints, or field reports; Property damage claims; and
  - d. Third-party arbitration proceedings where DaimlerChrysler is or was a party to the arbitration; and
  - e. Lawsuits, both pending and closed, in which DaimlerChrysler is or was a defendant or codefendant.

For subparts "a" through "d" state the total number of each item (e.g., consumer complaints, field reports, etc.) separately. Multiple incidents involving the same vehicle are to be counted separately. Multiple reports of the same incident are also to be counted separately

(i.e., a consumer complaint and a field report involving the same incident in which a crash occurred are to be counted as a crash report, a field report and a consumer complaint).

In addition, for items "c" and "d" provide a summary description of the alleged problem and causal and contributing factors and DaimlerChrysler's assessment of the problem, with a summary of the significant underlying facts and evidence. For items e and f, identify the parties to the action, as well as the caption, court, docket number, and date on which the complaint or other document initiating the action was filed.

3. Separately, for each item (complaint, report, claim, notice, or matter) within the scope of your response to Request No. 2, state the following information:
  - a. DaimlerChrysler's file number or other identifier used;
  - b. The category of the item, as identified in Request No. 2 (i.e., consumer complaint, field report, etc.);
  - c. Vehicle owner or fleet name (and fleet contact person), address, and telephone number;
  - d. Vehicle's VIN;
  - e. Vehicle's make, model and model year;
  - f. Vehicle's mileage at time of incident;
  - g. Incident date;
  - h. Report or claim date;
  - i. Whether a crash is alleged;
  - j. Whether property damage is alleged;
  - k. Number of alleged injuries, if any; and
  - l. Number of alleged fatalities, if any.

Provide this information in Microsoft Access 2000, or a compatible format, entitled "REQUEST NUMBER TWO DATA." See Enclosure, Data Collection Disc, for a pre-formatted table that provides further details regarding this submission.

Produce copies of all documents related to each item within the scope of Request No. 3. Organize the documents separately by category (i.e., consumer complaints, field reports, etc.) and describe the method DaimlerChrysler used for organizing the documents.

4. State, by model and model year, a total count for all of the following categories of claims, collectively, that have been paid by DaimlerChrysler to date for the peer vehicles that relate to, or may relate to, the alleged defect in the subject vehicles: warranty claims; extended warranty claims; claims for good will services that were provided; field, zone, or similar adjustments and reimbursements; and warranty claims or repairs made in accordance with a procedure specified in a technical service bulletin or customer satisfaction campaign.

Separately, for each such claim, state the following information:

- a. DaimlerChrysler's claim number;
- b. Vehicle owner or fleet name (and fleet contact person) and telephone number;
- c. VIN;
- d. Repair date;

- e. Vehicle mileage at time of repair;
- f. Repairing dealer's or facility's name, telephone number, city and state or ZIP code;
- g. Labor operation number;
- h. Problem code;
- i. Replacement part number(s) and description(s);
- j. Concern stated by customer; and
- k. Comment, if any, by dealer/technician relating to claim and/or repair.

Provide this information in Microsoft Access 2000, or a compatible format, entitled "WARRANTY DATA." See Enclosure, Data Collection Disc, for a pre-formatted table that provides further details regarding this submission.

5. Describe in detail the search criteria used by DaimlerChrysler to identify the claims identified in response to Request No. 4, including the labor operations, problem codes, part numbers and any other pertinent parameters used. Provide a list of all labor operations, labor operation descriptions, problem codes, and problem code descriptions applicable to the alleged defect in the subject vehicles. State, by make and model year, the terms that DaimlerChrysler offers for new vehicle warranty coverage on the peer vehicles (i.e., the number of months and mileage for which coverage is provided and the vehicle systems that are covered). Describe any extended warranty coverage option(s) related to the alleged defect that DaimlerChrysler offered for the subject vehicles and state by option, model, and model year, the number of vehicles that are covered under each such extended warranty.
6. Produce copies of all service, warranty, and other documents that relate to, or may relate to, the alleged defect in the subject vehicles, that DaimlerChrysler has issued for the peer vehicles to any dealers, regional or zone offices, field offices, fleet purchasers, or other entities. This includes, but is not limited to, bulletins, advisories, informational documents, training documents, or other documents or communications, with the exception of standard shop manuals.
7. State the number of each of the following, components that DaimlerChrysler has sold for use or possible use in the peer vehicles by part name, part number (both service and engineering/production), model and model year of the vehicle in which it is used, and month/year of sale:
  - a. Wheel studs;
  - b. Wheel nuts;
  - c. Front wheel hubs; and
  - d. Any kits that have been released, or developed, by DaimlerChrysler for use in service repairs to the subject component/assembly.

For each component part number, provide the supplier's name, address, and appropriate point of contact (name, title, and telephone number) Also identify by make, model and model year, any other vehicles of which DaimlerChrysler is aware that contain the identical component, whether installed in production or in service, and state the applicable dates of production or service usage.

8. Furnish copies of all engineering standards, performance specifications, quality assurance specifications, and documents related to validation testing for the subject components and for stud/nut fasteners in general.
9. State the basis for each specification and performance standard related to durability and provide the following additional information regarding the durability of the subject components:
  - a. State whether and how the specification addresses the effect of torque relaxation;
  - b. State how the specification addresses factors related to removal and reinstallation of wheels; and
  - c. Identify the significant aging effects acting on the subject components in field service, including environmental and use factors, and state how DaimlerChrysler's testing and specifications addresses each.
10. Provide a table showing the following information for each wheel type used as original equipment in the peer vehicles:
  - a. The part numbers for the wheel, stud, and nut;
  - b. The number of vehicles sold with the wheel type by model year;
  - c. The number of incidents identified from all sources that involve (1) wheel stud failure and (2) wheel separation due to stud failure, by model year and age interval (use the following age intervals: 0 to 15,000 miles, 15,000 to 30,000 miles, and greater than 30,000 miles);
  - d. The failure rates and DaimlerChrysler's assessment of which, if any, of the wheel types used in the peer vehicles show significantly greater rates of field failure experience than any of the other wheel types overall or in any of the stated age intervals; and
  - e. DaimlerChrysler's assessment of the reasons why any of the peer vehicle wheel types exhibit greater failure rates than others and why any of the wheel types may experience higher rates of wheel stud failure than wheel studs in peer minivans of similar age.
11. Provide the following information regarding wheel nut/stud torque requirements for the peer vehicles by wheel type and model year:
  - a. State the torque specifications;
  - b. State the minimum clamping load for each nut to adequately secure the wheel to the vehicle;
  - c. State the minimum torque necessary to achieve and maintain the clamping load stated in 11.b;
  - d. State the maximum torque that the parts can receive without stud damage;
  - e. Data regarding torque retention vs. time and wheel cycles for each combination of wheel, stud, and nut used in the subject vehicles;
  - f. Describe the effect of dirt, corrosion, or other use factors on the nut torque required for item 11.c.; and
  - g. Provide copies of all documents related to items 11.a through 11.f.

This letter is being sent to DaimlerChrysler pursuant to 49 U.S.C. § 30166, which authorizes NHTSA to conduct any investigation that may be necessary to enforce Chapter 301 of Title 49 and to request reports and the production of things. It constitutes a new request for information. DaimlerChrysler's failure to respond promptly and fully to this letter could subject DaimlerChrysler to civil penalties pursuant to 49 U.S.C. § 30165 or lead to an action for injunctive relief pursuant to 49 U.S.C. § 30163. (Other remedies and sanctions are available as well.) Please note that maximum civil penalties under 49 U.S.C. § 30165 have increased as a result of the recent enactment of the Transportation Recall Enhancement, Accountability, and Documentation (TREAD) Act, Public Law No. 106-414 (signed November 1, 2000). Section 5(a) of the TREAD Act, codified at 49 U.S.C. § 30165(b), provides for civil penalties of up to \$5,000 per day, with a maximum of \$15 million for a related series of violations, for failing or refusing to perform an act required under 49 U.S.C. § 30166. This includes failing to respond to ODI information requests.

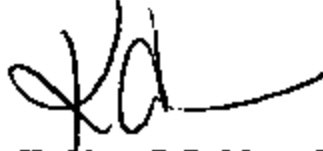
If DaimlerChrysler cannot respond to any specific request or subpart(s) thereof, please state the reason why it is unable to do so. If on the basis of attorney-client, attorney work product, or other privilege, DaimlerChrysler does not submit one or more requested documents or items of information in response to this information request, DaimlerChrysler must provide a privilege log identifying each document or item withheld, and stating the date, subject or title, the name and position of the person(s) from, and the person(s) to whom it was sent, and the name and position of any other recipient (to include all carbon copies or blind carbon copies), the nature of that information or material, and the basis for the claim of privilege and why that privilege applies.

DaimlerChrysler's response to this letter, in duplicate, together with a copy of any confidentiality request, must be submitted to this office by October 8, 2003. Please refer to EA03-004 in DaimlerChrysler's response to this letter. If DaimlerChrysler finds that it is unable to provide all of the information requested within the time allotted, DaimlerChrysler must request an extension from Jeffrey Quandt at (202) 366-5207 no later than five business days before the response due date. If DaimlerChrysler is unable to provide all of the information requested by the original deadline, it must submit a partial response by the original deadline with whatever information DAIMLERCHRYSLER then has available, even if an extension has been granted.

If DaimlerChrysler claims that any of the information or documents provided in response to this information request constitute confidential commercial material within the meaning of 5 U.S.C. § 552(b)(4), or are protected from disclosure pursuant to 18 U.S.C. § 1905, DaimlerChrysler must submit supporting information together with the materials that are the subject of the confidentiality request, in accordance with 49 CFR Part 512, to the Office of Chief Counsel (NCC-113), National Highway Traffic Safety Administration, Room 5219, 400 Seventh Street, S.W., Washington, D.C. 20590. DaimlerChrysler is required to submit two copies of the documents containing allegedly confidential information (except only one copy of blueprints) and one copy of the documents from which information claimed to be confidential has been deleted.

If you have any technical questions concerning this matter, please call Chris Lash of my staff at (202) 366-2370.

Sincerely,

A handwritten signature in black ink, appearing to read 'Kd' with a long horizontal flourish extending to the right.

Kathleen C. DeMeter, Director  
Office of Defects Investigation  
Enforcement

Enclosure: One CD ROM titled Data Collection Disc containing three files