DAIMLERCHRYSLER

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OFFICE OF
DEFECTS INVESTIGATION

DaimlerChrysler Corporation
Stephan J. Speth
Director
Vehicle Compliance & Safety Affairs

January 23, 2004

Mr. Jonathan D. White, Chief
Defects Assessment Division
Office of Defects Investigation
National Highway Traffic Safety Administration
U.S. Department of Transportation
400 Seventh Street, SW
Washington, D.C. 20590

Dear Mr. White:

Reference: NVS-211cw; DP03-006

This document contains DaimlerChrysler Corporation's response to the referenced inquiry regarding 1994-1997 Dodge Ram pickup trucks equipped with a front seat recliner mechanism.

The Dodge Ram pickup truck front seats and recliners exceed the requirements of FMVSS 207 by more than 300 percent. They provide excellent occupant protection in a rear impact conducted at FMVSS 301 levels. Their strength and performance are comparable to that of other seats designed and manufactured during the same time frame. Analysis of complaints and field reports has established that no trend exists which would indicate a durability concern during normal use. In summary, based on the results of static and dynamic testing, as well as over ten years of field experience with 1.2 million trucks on the road, the subject vehicles are safe, strong and pose no risk to motor vehicle safety.

Sincerely,

For Stephan J. Speth

Attachment and Enclosure (a/s)

DaimlerChrysler Corporation
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Q1. State the number of subject vehicles DaimlerChrysler has manufactured for sale or lease in the United States by make, model, and model year.

A1. The scope of this inquiry covers 1994 through 1997 model year Dodge Ram Pickup trucks equipped with seat back recliner mechanisms on the front seats. These vehicles are collectively referred to as the BR family. The first year of production for the BR family was 1994 MY. The count of vehicles built with the subject recliner mechanism by model year is detailed below:

- 1994 Dodge Ram 188,097 vehicles
- 1995 Dodge Ram 267,241 vehicles
- 1996 Dodge Ram 362,880 vehicles
- 1997 Dodge Ram 375,061 vehicles

Q2. State the number of, and provide copies of all documents relating to the alleged defect in the subject vehicles, from each of the following categories, either received or authorized by DaimlerChrysler, or of which DaimlerChrysler are otherwise aware. For each source organize the information by file/report number:

a. Owner and fleet reports;
b. Field reports, including all reports and requests for technical assistance from dealer personnel and/or zone offices;
c. Reports of, or requests for, roadside assistance or recovery;
d. Crash, injury and fatality reports, regardless of whether any claim, proceeding, or lawsuit is or was involved;
e. Property damage reports that do not involve a crash or fire;
f. Subrogation claims;
g. Third-party arbitration proceedings where DaimlerChrysler is or was a party to the arbitration; and
h. Lawsuits, both pending and closed, in which DaimlerChrysler is or was a defendant or codefendant.

Furnish a total number for each item separately, and provide copies of all requested documents, whether or not they have been verified by DaimlerChrysler. DaimlerChrysler's response shall include, but not limited to, (1) all reported incidents that have occurred or may have occurred, at least in part, due to circumstances, conditions, or problems caused by the alleged defect in the subject vehicles; (2) complaints or information provided by fleets, consumer groups, government agencies, insurance

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companies, and other entities that have provided such information to DaimlerChrysler; and (3) all crash, injury, or fatal incidents, regardless of whether and claim, proceeding, or lawsuit is or was involved, or whether or not each has been verified by DaimlerChrysler. Multiple incidents involving the same vehicle are to be counted separately.

For items "d" through "h" the documentation provided should also include DaimlerChrysler's file number, a summary of the alleged component failure and causal factors; DaimlerChrysler's assessment of the failure with a description of the significant underlying facts and evidence; and the identity of all involved parties, caption, court, docket number, and filing date (items "f" through "h" only).

A2. The following summarizes the non-privileged reports received by DaimlerChrysler Corporation that relate to, or may relate to, the alleged condition in the subject vehicles. DaimlerChrysler Corporation has conducted a reasonable and diligent search of our normal repositories of such information.

There are a total of 54 unique complaints, field reports, and VOQ reports alleging a potential recliner concern in vehicles not involved in a rearward impact. Taken across a vehicle population of approximately 1.2 million vehicles, this corresponds to a complaint rate of less than 5 conditions per 100,000 vehicles. DaimlerChrysler Corporation strongly believes that these reports are random, statistically insignificant, and do not identify a trend, especially given the advanced age of the subject vehicles. DaimlerChrysler Corporation also notes that the subject seats meet and exceed all of the requirements for FMVSS 207, Seating Systems.

a. There are a total of 37 customer complaints in the DaimlerChrysler Corporation system, involving 33 unique vehicles that alleged a potential recliner concern in vehicles not involved in a rearward impact. There are also 22 complaints involving rearward impacts with 17 unique vehicles.

   There are a total of 23 NHTSA VOQ reports. DaimlerChrysler Corporation has found 11 of these may be related to the alleged condition. Four of the 11 involved a rear impact. The remaining 12 reports address power seat adjusters, seat back hinge bolt, customer inquiries, and are not related to the recliner mechanism. Interestingly, the VOQ relating to Petitioner Robert Steele appears unrelated to an actual recliner failure or an actual incident, according to the information provided by Mr. Steele. It should also be noted

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that 3 of these reports do not involve Dodge Ram Pickup trucks. One report has an invalid vehicle identification number.

Seven of the 11 potentially relevant NHTSA VOQ's have related customer complaints in the DaimlerChrysler Corporation system. The remaining four NHTSA VOQ's are unique reports which do not have related complaints in the DaimlerChrysler Corporation system.

There are no fleet reports for the alleged condition.

b. There are 16 field reports that contain 14 unique vehicle reports that alleged a potential recliner concern in vehicles not involved in a rearward impact. There are two field reports that involve a rearward impact. One of the field reports also has a consumer complaint associated with it.

c. There are no requests for roadside assistance or recovery.

d. There are 34 DaimlerChrysler Corporation complaints, field reports, lawsuits, and claims involving 28 unique vehicles that allege a rearward impact and subsequent rearward seat back deformation potentially related to the recliner mechanism. There are 22 reported injuries and two reported fatalities. Regarding the reported fatalities, one involved a rear end collision by an eighteen wheel tractor trailer; the second involved a rear end collision by a full sized pickup truck towing a passenger car on a flat bed trailer.

One consumer complaint alleges that the driver struck a snow bank with only minor damage to the bumper after the driver seat back collapsed.

e. There are no property damage reports that are responsive to this inquiry.

f. There are no subrogation claims involving DaimlerChrysler that are responsive to this inquiry.

g. There are no third party arbitration proceedings involving DaimlerChrysler that are responsive to this inquiry.

h. There have been 8 lawsuits and 3 claims that may be responsive.

Copies of all reports and the supporting documents are included in Enclosure 1.

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Q3. State the total number of warranty claims; extended warranty claims; requests for "good will", field, zone, or similar adjustments and reimbursements; and claims or repairs made in accordance with a procedure specified in a technical service bulletin or customer satisfaction campaign that have been received by DaimlerChrysler to date that relate, or could relate, to the alleged defect in the subject vehicles by model and model year. Describe the search criteria, including all labor operations and problem codes, used by DaimlerChrysler in responding to this request and provide an electronic copy of all problem codes and problem code descriptions applicable to the subject component.

Also, furnish an electronic summary of the following information, in Microsoft Excel 2000 compatible format, entitled "WARRANTY DATA," listing the warranty claims for the subject component, including those contributing to the total count identified in DaimlerChrysler's response to this request.

a. DaimlerChrysler's claim number;
b. Vehicle owner or fleet name (and fleet contact person) and telephone number;
c. VIN;
d. Repair date;
e. Repair mileage;
f. Repairing dealer name, phone number and city and state or ZIP code;
g. Labor operation number and description;
h. Problem code and description;
i. Replacement part number(s) and description(s);
j. Customer concern stated; and
k. dealer/technician comment summary.

A3. The total number of unique warranty claims for front seat back recliner mechanism repair/replacement is 4230. The electronic summary is included in Enclosure 2 – WARRANTY DATA.

This data includes recliner repair/replacements for any reason, and an exact cause for each warranty claim cannot be determined. Notably, this data includes numerous conditions unrelated to the condition at issue in this inquiry, or any safety concern whatsoever. For example, many of the included warranty claims relate to customer dissatisfaction with the so-called "inertia latch" feature that

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was designed as a convenience for moving the seat back forward for access to and from the rear seat area. Field experience revealed that the introduction of the inertia latch feature on the club cab recliners was a source of customer complaints because the function was not understood and the components were a potential source of BSR (Buzz, Squeak, and Rattle). In response to these customer complaints, the inertia feature was eliminated from the design for the 1997 model year, and this change resulted in a significant decrease in seat back recliner warranty. The inertia latch feature had no effect on seat back integrity or strength. Due to the above stated reasons and the fact that the complaint rate for the alleged concern is extremely low, DaimlerChrysler Corporation does not believe warranty claim information is in any way useful in indicating a defect trend relative to the subject component.

The search criteria used by DaimlerChrysler Corporation to identify warranty claims can be found in the charts below:

Mechanism, Reclining Seat/Forward Folding Right - Replace	23-13-55-06
Mechanism, Reclining Seat/Forward Folding Left - Replace	23-13-55-07

Problem codes for the above reference labor operations are provided below:

07	Binds, sticks, or seized
11	Broken or cracked
50	Improper Adjustment
51	Improperly installed
SE	Shortage and/or error
UC	Uncodeable

Q4. Furnish a copy of each service, warranty, or technical document(s), including (but not limited to) bulletins, advisories, informational documents, training documents, or other communications that relate to or may relate to the alleged defect in the subject vehicles that DaimlerChrysler has issued to any dealers, regional or zone offices, field offices, fleet purchasers, or other entities.

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A4. There have been no DaimlerChrysler Corporation documents issued to any dealers, regional or zone offices, field offices, fleet purchasers, or other entities that are responsive to this inquiry.

Q5. Identify and describe all studies, surveys, investigations, testing, and other analyses pertaining to the alleged defect in the subject vehicles that have been, are being or will be conducted by, or for, DaimlerChrysler. For each such action, provide copies of all relevant documents, as a separate enclosure in chronological order. This should include, but not limited to, methodologies, action plans, final reports and presentations with the original file names and dates, regardless of whether the documents are in interim, draft, or final form. Also furnish an electronic summary of all such actions, including the following information, in Microsoft Excel 2000, or a Microsoft Excel 2000 compatible format entitled "INVESTIGATIONS":

a. Action title or identifier;
b. The actual or planned start date;
c. The actual or expected end date;
d. Brief summary of the subject or objective;
e. Engineering group(s)/supplier(s) responsible; and
f. Findings and or conclusions.

A5. DaimlerChrysler Corporation conducted a reasonable and diligent search for documents, where kept in the ordinary course of business, and has identified the following which may be responsive to this inquiry.

Included in Enclosure 3 are DaimlerChrysler Corporation compliance reports for FMVSS 207 Seating Systems for the 1994-1997 model year BR-family vehicles. These reports indicate that the seating systems were tested in accordance with the standard and met all of the requirements. Detailed test reports are not retained and are therefore not included in this submission.

DaimlerChrysler Corporation has conducted a rearward impact research test on a subject vehicle at FMVSS 301 levels. This test clearly indicates that the seat back yields progressively during a rearward impact and provides favorable occupant protection. The detailed test report including results, test photographs, and test videos are included in Enclosure 3. Further discussion of this test is included in response to Question 8.

DaimlerChrysler Corporation previously conducted an investigation into an allegation that the recliner upper outer plate may have been manufactured with a

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different grade of steel than the material specified on the drawing. Materials analysis by DaimlerChrysler Corporation established that this grade of steel used provided equivalent strength properties and therefore did not affect recliner performance. Therefore, the investigation was closed. A copy of the investigation file is included in Enclosure 3.

Enclosure 3 also includes a test report from the recliner supplier. This test report clearly indicates that the subject recliner exceeds DaimlerChrysler Corporation's minimum rearward moment strength requirements with significant margin.

Q6. Identify and describe all modifications or changes made by, or on behalf of, DaimlerChrysler in the manufacture, design, or material composition, of the subject component, from the start of production to date, which may relate to the alleged defect in the subject vehicles and up to the 1999 MY. The following information must be included for each such modification or change:

a. The date or approximate date on which the modification or change was incorporated into vehicle production;
b. A description of the modification or change;
c. The reason(s) for the modification or change;
d. The part number of the modified part;
e. Whether the original unmodified component was withdrawn from sale, and if so, when;
f. Whether the modified or changed components can be interchanged with earlier production components; and
g. Provide an assembly drawing for the recliner mechanism including the drawing for the upper outer plate identifying material specifications and key product characteristics for the subject vehicles.

Also provide the above information for any modification or change that DaimlerChrysler is aware of which may be produced, distributed, or made available within the next 120 days.

A6. DaimlerChrysler Corporation purchases the seat complete assembly from its seat system supplier, Lear Corporation, and therefore DaimlerChrysler Corporation does not maintain design histories of subcomponents such as a recliner mechanism. Included in Enclosure 4 are Seat Complete Chart Drawings and Part Model Comment Pages which includes a listing of DaimlerChrysler Engineering Change Notices. Supplier drawings in DaimlerChrysler Corporation's possession are also included in Enclosure 4.

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In the 1998 MY, the Dodge Ram club cab pickup truck was significantly revised when the four door "quad cab" version was introduced. Between the 1998 and 2002 model years, the club cab Ram pickup trucks were referred to as the BE-family. In order to facilitate access to the rear seating area, the two rear doors opened rearward and the B-pillar was removed. Because the B-Pillar was no longer available to mount the front seat belt retractor assembly, the BE seat belts were integrated into the front seat structure. This required significant changes to the seat structure and the recliner mechanism to manage the additional loads carried by the seat belts in frontal impacts.

DaimlerChrysler Corporation is not aware of any planned future changes to the recliner mechanism.

Q7. State the number of each of the following that DaimlerChrysler has sold that may be used in the subject vehicles by component name, part number (both service and engineering); supplier; and month/year of sale:

a. Subject component;

b. Any kits that have been released, or developed by DaimlerChrysler for use in service repairs to the subject component/assembly; and

For each component part number, provide the supplier name, address, and appropriate point of contact (name, title, and telephone number), as well as each model and model year for which the component is used.

A7. Enclosure 5 provides part sales information by month/year for each seat recliner part number used in the subject vehicles. The data supplied is for the 1998 calendar year and forward. Part sales data prior to the 1998 calendar year is no longer available. This data includes seat back recliners sold for any reason, including warranty and dealer inventory. As stated in response to Request No. 3 warranty data section, it is not possible to determine an exact usage or need for these part sales. However, because the complaint rate for the alleged concern is extremely low and the part sales have declined significantly over time, DaimlerChrysler Corporation believes that this information indicates that there is no durability concern with the recliner mechanism. It should also be noted that some portion of these part sales can be attributed to DaimlerChrysler Corporation Recall 602, which affected approximately 17,000 1994 model year vehicles and was not related to recliner performance.

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Q8. Furnish DaimlerChrysler's assessment of the alleged defect in the subject vehicle, including:

a. The causal or contributory factor(s);
b. The failure mechanism(s);
c. The failure mode(s);
d. The risk to motor vehicle safety that it poses;
e. What warnings, if any, the operator and the other persons both inside and outside the vehicle would have that the alleged defect was occurring or subject component was malfunctioning'
f. The reports included with this inquiry; and
g. Petitioners claims 4 through 13 on pages 2 and 3 of the attached petition.

A8. The front seat recliner mechanisms in 1994 through 1997 model year Dodge Ram (BR) pickup trucks are strong and safe. Indeed, the very aspect of seat recliner performance that is the subject of this inquiry is controlled by a Federal Motor Vehicle Safety Standard -- FMVSS 207 -- that BR front seats exceed by a threefold factor. Moreover, dynamic testing at FMVSS 301 levels confirms that BR seats retain their structural integrity and provide excellent occupant protection when struck by a 4,000 pound rear moving barrier traveling in excess of 30 mph. In short, and for the reasons that follow, the subject vehicles pose no risk to motor vehicle safety.

DaimlerChrysler Corporation recognizes the need to manage and dissipate the energy generated in rear impact collisions in order to reduce injuries to vehicle occupants. Like virtually all production automobile seats, seats in DaimlerChrysler Corporation vehicles are designed to deflect rearward during moderate to severe rear impacts, thereby absorbing energy and moderating the crash forces that are applied to occupants.

Automobile seats absorb energy through the yielding or deformation of structural components, including the seat frame, recliner mechanism, seat base and seat tracks. How a seat performs in a given accident is a function of many factors, relating not only to the seat design, but also to the unique circumstances of the accident itself. The mere fact that a seat yields or deforms rearward in a crash does not indicate a defect. To the contrary, such structural deformation indicates that the seat has performed its energy management function, absorbing crash energy that would otherwise have been transmitted directly to its occupant. As a result of crash energy management by the seat, most rear-end collisions result in minor or no injuries to occupants of the struck vehicle.

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The front seats in 1994 through 1997 full size Dodge Ram (BR) pickup trucks are of conventional design and are similar to other automobile seats from the mid-1990s in terms of their strength and energy management characteristics. The BR front seats are equipped with an outboard mounted, single sided recliner mechanism. The recliner is connected to the seat back frame by a metal bracket (also known as the upper outer plate) that is stamped from high strength automotive steel. As stated in response to Questions 6 and 7 above, the front seat systems in BR pickup trucks were designed, manufactured and supplied by an outside supplier, Lear Corporation.

Like other conventional automobile seats, BR front seats absorb energy during rear impacts through structural deformation. Depending on the crash circumstances, this deformation may manifest itself in various seat components, including but not limited to the seat back frame, seat risers, seat tracks and the recliner mechanism. The floor pan to which the seat is connected may also experience deformation.

If the occupant-induced loads in a given accident are great enough, the metal bracket that connects the recliner to the seat back frame may experience a ductile overload fracture, or tear. In rare instances, the metal bracket may tear completely. By its nature, a ductile tear occurs over time and involves energy absorption. Ductile tears are distinct from fatigue fractures (which occur after repeated, cyclical applications of force), and brittle fractures (which involve materials such as glass that simply shatter without absorbing significant energy). The mere fact that a ductile tear occurs does not indicate a defect, since all metals are subject to fracture or tearing if overloaded with sufficient force.

Based on its testing, analysis and knowledge of BR seats, DaimlerChrysler Corporation has determined that on those infrequent occasions in which the metal bracket tears, the tear occurs only after the bracket has absorbed substantial energy and near the end of the seat's occupant retention capability. In other words, the seat back will deflect and deform considerably rearward and will have absorbed substantial energy before any tearing first appears. The seat back will deflect further as the tear progresses through the bracket. Contrary to the claims made by Petitioner, the seat does not fail catastrophically, "with the load-carrying capability suddenly dropping to zero." Moreover, the seat back does not suddenly "collapse" from an upright, normal driving position to a flat position "in an uncontrolled fashion." Rather, it absorbs energy as it deforms rearward.

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The BR front seats and recliners comply fully with all applicable federal safety standards, in particular FMVSS 207 (Seating Systems), which among other things requires that front seats withstand a rearward moment of 3,300 inch-pounds. In addition, DaimlerChrysler Corporation has further confirmed the strength and safety of the BR seats through both static and dynamic testing.

Statically, DaimlerChrysler Corporation has pull tested a BR front seat to determine its ultimate load strength. The results are contained in Enclosure 7. The BR seat absorbed over 800 pounds of force before the recliner failed. This corresponds to 11,200 inch-pounds – 340 percent more than FMVSS 207 requires for ultimate rearward load strength. At this level of ultimate strength, the Dodge Ram (BR) seats compare favorably to competitive seats from the 1990s. See Enclosure 7.

Dynamically, DaimlerChrysler Corporation conducted an FMVSS 301 (Fuel System Integrity) rear moving barrier test on a 1997 Dodge Ram (BR) 2500 club cab pickup. Both front seats were occupied by 50th percentile male anthropomorphic test devices (dummies), restrained and instrumented with head, neck, chest and pelvis channels. The test summary speaks for itself:

The impact involved a FMVSS 301 style rear moving barrier weighing approximately 4000 pounds impacting a stationary 1997 Dodge Ram 2500 pickup truck at 30.5 mph. The test was set up in accordance [with] FMVSS 301 (Fuel System Integrity). During the impact the vehicle experienced approximately . . . 40 g peak levels of acceleration. The vehicle demonstrated excellent performance in terms of seat system energy management characteristics. The seatbacks bent and deformed rearward, utilizing a portion of their total available energy absorption capabilities. Neither dummy head contacted any portion of the rear bench seat and they experienced normal HICs that were well below the published injury tolerance levels (1000 HIC).

Specifically, the driver dummy recorded a HIC of 116; while the passenger dummy recorded a HIC of 120. It should be noted that although both front seats deflected rearward (20 and 26 degrees, respectively), neither seat exhausted its full energy absorption capability. The driver recliner bracket was not torn. The passenger bracket experienced a partial tear of about one centimeter. The fact that the tear occurred after 26 degrees of seat back deformation and was incomplete demonstrates that the tear was ductile in nature and that the recliner did not simply "snap" catastrophically while the seat back was in an upright position. Furthermore, the tearing process did not begin until the seat back was

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already in contact with the rear seat cushion, allowing it to absorb even more energy.

The static and dynamic testing described above undermines Petitioner's claims that the design of the BR front seat recliners is defective and creates the potential for serious head injuries in rear impacts. Regarding some of Petitioner's specific factual allegations:

- "[M]aximum horizontal load (strength) capability . . . just above 600 pounds" (para. 4): DaimlerChrysler Corporation's own static testing disproves this. On information and belief, Petitioner bases this allegation on testing conducted by a plaintiffs' seat expert in the context of litigation. The expert's result – 200 pounds less than that reached by DaimlerChrysler Corporation – is largely explained by two factors. First, he mounted the seat to a rigid fixture, not an energy absorbing floor pan as in a true vehicle environment. Second, he applied the load through a body block that slid up the seat back as it deformed rearward, thereby increasing the lever arm and decreasing the force necessary to obtain a failure.

- "[P]otential for serious head injuries" (para. 5): DaimlerChrysler Corporation's dynamic vehicle crash test at FMVSS 301 levels disproves this. The HIC values recorded were well below injury producing levels.

- "[A]nisotropic metal," "elongated grains," "placing of holes," etc. (paras. 6-7): Again, the actual performance of the BR front seats, as measured by their real world experience and by DaimlerChrysler Corporation's static and dynamic testing, disproves this. Moreover, the steel utilized in the BR recliner upper outer plate met the Chrysler strength specification, which set forth a minimum yield strength of 50,000 psi and a maximum yield strength of 65,000 psi.

- Purported knowledge of "problems" (paras. 8-10): This false claim is based on a gross mischaracterization of the design, development and testing history. The front seats in BR pickups were tested repeatedly and met all requirements in the applicable Chrysler performance specification, PF 8401, relating to rear impact strength. Most importantly, there was never any "catastrophic collapse issue," as alleged in paragraphs 9 and 10. The only performance standards that were not met relate to certain "deflection" and "set" requirements for measuring the seat during and after the application of a 375 pound load. Yet these so-called "wallet tests" do not relate to rear impact performance, and the noncompliances (which literally measured fractions of

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an inch) resulted solely from a change in the testing protocol, not from any change in the seat itself. Indeed, when the BR seats were released for production in 1993, they passed all applicable test requirements, including those for deflection and set, under the testing protocol then in existence. Finally, the alleged "fatigue cracks" issue in paragraph 9 relates to early prototypes and was corrected in 1992, two years before the BR Ram club cab pickup went into production.

- Purported "secret internal impact simulation tests" (para. 11): This claim is based on another gross mischaracterization of the design history. In September 1994, Chrysler ran a series of sled tests as part of its early development of what became the all-new 1998 Dodge Ram (BE) pickup, then in the planning stages. These sled tests were deliberately run at extreme, "worst case scenario" levels – well in excess of those seen in an FMVSS 301 rear moving barrier test using an actual vehicle – to give Chrysler engineers a baseline knowledge of where they were at in terms of seat performance. As is typical with such future development tests, current production seats were used. Although BR seats were used, the tests were not run to support the BR pickup program, which was already in production.

- Alleged failure to meet Chrysler steel specification (para. 12): DaimlerChrysler Corporation is aware of one instance in which the steel used in a recliner bracket did not meet its materials specification. In the course of the Bell v. DaimlerChrysler Corporation lawsuit in Texas, it was determined that the driver recliner upper outer plate was composed of different steel than specified. Nevertheless, the part exceeded the minimum ultimate tensile strength requirement, and the chemical discrepancy did not affect the performance of the recliner. In addition, the passenger recliner from the same truck was also tested, and it was found to meet both the material composition and the minimum strength specifications.

As stated in response to Question 2, of the 23 NHTSA VOQ reports, DaimlerChrysler Corporation has found 11 of these may be related to the alleged condition. Four of the 11 involved a rear impact. The remaining 12 reports address power seat adjusters, seat back hinge bolt, customer inquiries, and are not related to the recliner mechanism (ODI Reference No's: 727877, 8002677, 741549, 546214, 854201, 878505, 823153, 635608, 831833, 836780, 10027184, 734170). Interestingly, the VOQ relating to Petitioner Robert Steele appears unrelated to an actual recliner failure or an actual incident, according to the information provided by Mr. Steele. It should also be noted that 3 of these reports do not involve Dodge Ram Pickup trucks (ODI Reference No.'s: 635608,

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836780, 734170). One report has an invalid vehicle identification number (ODI Reference No. 831633). As stated previously, DaimlerChrysler firmly believes that these reports are random and do not identify a trend.

In summary, the BR front seats and recliners exceed the strength requirements of FMVSS 207 by over 300 percent. They provide excellent occupant protection in rear impacts at FMVSS 301 levels. Their strength and performance are comparable to that of other seats designed and manufactured during the same time frame. Analysis of complaints and field reports has established that no trend exists which would indicate a durability concern during normal use. Based on the results of static and dynamic testing, as well as over ten years of field experience with 1.2 million trucks on the road, the subject vehicles are safe, strong and pose no risk to motor vehicle safety.