

DAIMLERCHRYSLER

DaimlerChrysler Corporation

Stephan J. Speth

Director

Vehicle Compliance & Safety Affairs

January 9, 2004

Mr. Jeffrey L. Quandt, Chief
Vehicle Control 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. Quandt:

Reference: NVS-218dsy; EA03-011

This document contains DaimlerChrysler Corporation's response to the referenced inquiry regarding 1993-1999 model year Chrysler Concorde, Chrysler LHS, and Dodge Intrepid vehicles; 1993-1997 model year Eagle Vision vehicles; 1999 model year Chrysler 300M vehicles; 1995-1999 Chrysler Cirrus and Dodge Stratus vehicles; 1996-1999 model year Chrysler Sebring Convertible and Plymouth Breeze vehicles; and 1997-1999 model year Plymouth Prowler vehicles manufactured by DaimlerChrysler Corporation.

DaimlerChrysler Corporation has issued a Defect Information Report, complying with the requirements of 49 CFR Part 573, Defect and Noncompliance Reports, for DaimlerChrysler Corporation Recall #C45. As per the agreement reached between DaimlerChrysler Corporation and NHTSA ODI during the December 18, 2003 phone conference, this Defect Information Report in conjunction with the following partial response will satisfy the requirements for the EA03-011 information request.

As per the discussions between DaimlerChrysler Corporation and NHTSA ODI, the Prowler (PR) vehicle family is no longer considered part of the subject vehicles. This decision was based on significant design differences in the PR shifter which reduce the amount of force an occupant can input into the Ignition-park interlock system. In addition to the design differences, there have been no reported occurrences of the alleged concern received by DaimlerChrysler Corporation or NHTSA ODI.

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DaimlerChrysler Corporation validates all vehicles for proper function of the Ignition-park interlock system before the vehicle is shipped from the assembly plant. DaimlerChrysler Corporation verified that the Ignition-park interlock systems on the subject vehicles were fully functional when the vehicles left our assembly plants. Our testing indicates that an intact system is robust enough to withstand unintended shifting, especially by children left unattended in the vehicle. In our opinion, the design met the intent of FMVSS 114.

Based upon our analysis, DaimlerChrysler Corporation believes that these vehicles are still capable of being safely parked. With the interlock system overpowered, the vehicle transmission can still be placed into "Park", and the transmission parking pawl remains completely functional. Also, the shifter gate that provides a positive stop between "Park" and "Reverse" is still intact. This eliminates the potential to accidentally "bump" the shift lever out of the "Park" position. In order for a vehicle roll-away incident to occur when the key is not present in the ignition, all of the following conditions must be present: the Ignition-park interlock system was previously defeated by an adult, the transmission shift lever is not placed in the park position or is moved from the park position, and the parking brake is not properly applied. Nonetheless, DaimlerChrysler feels strongly about the safety of its customers and is proceeding with the previously mentioned safety recall.

Sincerely,



Stephan J. Speth

Attachment and Enclosure (a/s)

- Q1. State, by model, model year, type of shift gate, and type of shift knob, the number of subject vehicles DaimlerChrysler has manufactured for sale or lease in the United States. Separately, for each subject vehicle manufactured to date by DaimlerChrysler, state the following:**
- a. Vehicle Identification number (VIN);**
 - b. Date of manufacture;**
 - c. The type of shift gate the original equipment floor shifter assembly was manufactured with (e.g., 'Thin' or 'Reinforced');**
 - d. The type of shift knob the original equipment transmission shift mechanism was manufactured with (e.g., 'T' or 'Cobra' style);**
 - 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).**

- A1. DaimlerChrysler Corporation has issued a Defect Information Report, complying with the requirements of 49 CFR Part 573, Defect and Noncompliance Reports, for DaimlerChrysler Corporation Recall #C45. As per the agreement reached between DaimlerChrysler Corporation and NHTSA ODI during the December 18, 2003 phone conference, this Defect Information Report in conjunction with the following partial response will satisfy the requirements for this portion of the EA03-011 information request.**

As per the agreement between DaimlerChrysler and NHTSA ODI, the PR-family (Prowler) of vehicles is no longer considered part of the subject vehicles. This decision was based on significant design differences in the PR shifter which reduce the amount of force an occupant can input into the ignition-park interlock system. In addition to the design differences, there have been no reported occurrences of the alleged concern received by DaimlerChrysler Corporation or NHTSA ODI.

The following table provides the number of subject vehicles by family and model year manufactured for sale in the United States.

Family	1993 MY	1994 MY	1995 MY	1996 MY	1997 MY	1998 MY	1999 MY	Totals
LH	134,462	246,166	203,063	185,718	151,389	100,186	270,284	1,273,258
JA	0	0	103,955	178,909	184,752	205,330	169,893	640,839
JX	0	0	0	47,993	58,028	50,888	46,771	201,861
Totals	134,462	246,166	307,018	390,620	392,170	356,384	488,948	2,315,768

- Q2.** State the number of each of the following, received by DaimlerChrysler, or of which DaimlerChrysler is otherwise aware, 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 a possible defect in a subject vehicle, property damage claims, consumer complaints, or field reports;
 - d. Property damage claims;
 - e. Third-party arbitration proceedings where DaimlerChrysler is or was a party to the arbitration; and
 - f. Lawsuits, both pending and closed, in which DaimlerChrysler is or was a defendant or codefendant.
- A2.** DaimlerChrysler Corporation has issued a Defect Information Report, complying with the requirements of 49 CFR Part 573, Defect and Noncompliance Reports, for DaimlerChrysler Corporation Recall #C45. As per the agreement reached between DaimlerChrysler Corporation and NHTSA ODI during the December 18, 2003 phone conference, this Defect Information Report in conjunction with the following partial response will satisfy the requirements for this portion of the EA03-011 information request. As per the agreement between DaimlerChrysler and NHTSA ODI, the PR-family (Prowler) of vehicles is no longer considered part of the subject vehicles.

The following table summarizes the reported occurrences of the alleged defect, based upon customer complaints and field reports, received by DaimlerChrysler that relate to, or may relate to, the alleged condition in the 1998-2001 model year vehicles:

	1998 JA/JX	1998 LH	1999 JA/JX	1999 LH	Totals	2000 JA/JX	2000 LH	2001 JR	2001 LH	Totals
Reported Occurrences	308	60	125	109	602	13	24	18	6	61
Property Damage	45	15	26	29	115	6	2	5	1	13
Injury Incidence	6	3	5	0	14	0	0	0	0	0
# of Injuries	6	3	5	0	14	0	0	0	0	0
Fatality Incidences	0	0	0	1	1	0	0	0	0	0
# of Fatalities	0	0	0	1	1	0	0	0	0	0

The above numbers do not include VOQ reports submitted to NHTSA ODI. As agreed to in previous discussions with ODI, only those reports made to DaimlerChrysler Corporation are included in the supplied counts. However, DaimlerChrysler Corporation is aware that there are incidences reported to NHTSA that are both unique to, and included in, the above counts. DaimlerChrysler's analysis of all reports of which DaimlerChrysler is aware of, including NHTSA VOQ reports, indicates that, for the 1998 and 1999 model year subject vehicles, there are 612 unique vehicles that potentially exhibited the alleged condition.

- Q3. 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;
 - l. Number of alleged fatalities, if any; and
- A3. DaimlerChrysler Corporation has issued a Defect Information Report, complying with the requirements of 49 CFR Part 573, Defect and Noncompliance Reports, for DaimlerChrysler Corporation Recall #C45. As per the agreement reached between DaimlerChrysler Corporation and NHTSA ODI during the December 18, 2003 phone conference, this Defect Information Report in conjunction with the following partial response will satisfy the requirements for this portion of the EA03-011 information request. As per the agreement between DaimlerChrysler and NHTSA ODI, the PR-family (Prowler) of vehicles is no longer considered part of the subject vehicles.**

DaimlerChrysler will not be providing the detailed information for the items referred to in Question #2. It has been agreed to with NHTSA ODI that the counts supplied in response to Question #2 are sufficient for this response.

- Q4.** Produce copies of all documents within the scope of Request No. 2 that are related to items 'c' and 'd' only (crash, injury, fatality or property damage claims). Organize the documents separately by category (i.e., crash injury fatality, property damage) and describe the method DaimlerChrysler used for organizing the documents within the category (i.e., by file number, by incident date, etc).
- A4.** DaimlerChrysler Corporation has issued a Defect Information Report, complying with the requirements of 49 CFR Part 573, Defect and Noncompliance Reports, for DaimlerChrysler Corporation Recall #C45. As per the agreement reached between DaimlerChrysler Corporation and NHTSA ODI during the December 18, 2003 phone conference, this Defect Information Report in conjunction with the following partial response will satisfy the requirements for this portion of the EA03-011 information request. As per the agreement between DaimlerChrysler and NHTSA ODI, the PR-family (Prowler) of vehicles is no longer considered part of the subject vehicles.

Per the phone conference with NHTSA ODI held on January, 8, 2004, the only detailed information that DaimlerChrysler will be providing as a response to this question is in regards to the one reported fatality potentially resulting from the alleged condition. The detailed information for this report is included as Enclosure 1. Other than this detail it has been agreed to with NHTSA ODI that the counts supplied in response to Question #2 are sufficient for the remainder of the response to this question.

- Q5.** 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 that relate to, or may relate to, the alleged defect in the subject vehicles: warranty claims; extended warranty claims; claims related to the subject recall, 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.

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

- a. DaimlerChrysler's claim number;**
- b. VIN;**
- c. Repair date;**
- d. Repairing dealer's or facility's ID number and ZIP code;**
- e. Vehicle owner or fleet name (and fleet contact person);**
- f. Vehicle mileage at time of repair;**
- g. Labor operation number;**
- h. Problem code;**
- i. Concern stated by customer; and**
- j. Comment, if any, by dealer/technician relating to claim and/or repair.**

- A5. DaimlerChrysler Corporation has issued a Defect Information Report, complying with the requirements of 49 CFR Part 573, Defect and Noncompliance Reports, for DaimlerChrysler Corporation Recall #C45. As per the agreement reached between DaimlerChrysler Corporation and NHTSA ODI during the December 18, 2003 phone conference, this Defect Information Report in conjunction with the following partial response will satisfy the requirements for this portion of the EA03-011 information request. As per the agreement between DaimlerChrysler and NHTSA ODI, the PR-family (Prowler) of vehicles is no longer considered part of the subject vehicles.**

DaimlerChrysler will not be providing the information requested. It has been agreed to with NHTSA ODI that the information is no longer required for this response.

- Q6. Describe in detail the search criteria used by DaimlerChrysler to identify the claims identified in response to Request No. 5, 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 of the new vehicle warranty coverage offered by DaimlerChrysler on the subject 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.**

- A6. DaimlerChrysler Corporation has issued a Defect Information Report, complying with the requirements of 49 CFR Part 573, Defect and Noncompliance Reports, for DaimlerChrysler Corporation Recall #C45. As per the agreement reached between DaimlerChrysler Corporation and NHTSA ODI during the December 18, 2003 phone conference, this Defect Information Report in conjunction with the following partial response will satisfy the requirements for this portion of the EA03-011 information request. As per the agreement between DaimlerChrysler and NHTSA ODI, the PR-family (Prowler) of vehicles is no longer considered part of the subject vehicles.

DaimlerChrysler will not be providing the information requested. It has been agreed to with the NHTSA ODI that this information is no longer required for this response.

- Q7. For the subject LH and PR vehicle families, produce copies in draft or final version of all service, warranty, and other documents that relate to, or may relate to, the alleged defect in those vehicles, that DaimlerChrysler has issued, or is planning to issue within the next 120 days, 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.
- A7. There have been no DaimlerChrysler documents issued to any dealers, regional or zone offices, field offices, fleet purchasers, or other entities that are responsive to this inquiry.
- Q8. Describe all assessments, analyses, tests, test results, studies, surveys, simulations, investigations, inquiries and/or evaluations (collectively, "actions") that relate to, or may relate to, the alleged defect in the subject vehicles that have been conducted, are being conducted, are planned, or are being planned by, or for, DaimlerChrysler. For each such action, provide the following information:
- Action title or identifier;
 - The actual or planned start date;
 - The actual or expected end date;
 - Brief summary of the subject and objective of the action;

- e. Engineering group(s)/supplier(s) responsible for designing and for conducting the action; and
- f. A brief summary of the findings and/or conclusions resulting from the action.

A8. DaimlerChrysler Corporation has issued a Defect Information Report, complying with the requirements of 49 CFR Part 573, Defect and Noncompliance Reports, for DaimlerChrysler Corporation Recall #C45. As per the agreement reached between DaimlerChrysler Corporation and NHTSA ODI during the December 18, 2003 phone conference, this Defect Information Report in conjunction with the following partial response will satisfy the requirements for this portion of the EA03-011 information request. As per the agreement between DaimlerChrysler and NHTSA ODI, the PR-family (Prowler) of vehicles is no longer considered part of the subject vehicles.

It has been agreed between DaimlerChrysler and the NHTSA ODI that the following, previously supplied information, is a sufficient response to this Question:

- a. An extensive field survey was performed on the subject vehicles in order to determine an estimate of the scope of the alleged condition. The final results of this field survey were submitted to NHTSA ODI as an attachment in a December 15, 2003 electronic mail from DaimlerChrysler.
- b. The engineering data used by DaimlerChrysler Corporation to understand the floor shifter override event and develop the proposed field fix was reviewed with NHTSA ODI in a December 9, 2003 Technical Review at DaimlerChrysler. The data was subsequently submitted to the NHTSA Office of Chief Counsel on December 10, 2003 with a request for confidential treatment.

Q9. For the subject LH and PR vehicle families, describe all modifications or changes made by, or on behalf of, DaimlerChrysler in the design, material composition, manufacture, quality control, supply, or installation of the subject components, from the start of production to date, which relate to, or may relate to, the alleged defect in those vehicles. For each such modification or change, provide the following information:

- a. The date or approximate date on which the modification or change was incorporated into vehicle production;

- b. A detailed description of the modification or change;
- c. The reason(s) for the modification or change;
- d. The part numbers (service and engineering) of the original component;
- e. The part number (service and engineering) of the modified component;
- f. Whether the original unmodified component was withdrawn from production and/or sale, and if so, when;
- g. When the modified component was made available as a service component; and
- h. Whether the modified component can be interchanged with earlier production components.

A9. DaimlerChrysler Corporation has issued a Defect Information Report, complying with the requirements of 49 CFR Part 573, Defect and Noncompliance Reports, for DaimlerChrysler Corporation Recall #C45. As per the agreement reached between DaimlerChrysler Corporation and NHTSA ODI during the December 18, 2003 phone conference, this Defect Information Report in conjunction with the following partial response will satisfy the requirements for this portion of the EA03-011 information request. As per the agreement between DaimlerChrysler and NHTSA ODI, the PR-family (Prowler) of vehicles is no longer considered part of the subject vehicles.

As agreed to between DaimlerChrysler and NHTSA ODI, a detailed response to this Question is not needed as the subject components of the LH-family and PR-family vehicles are substantially similar, and follow the same change history as the JA/JX-family subject components. This change history was provided as part of the response to the RQ03-005 Information Request Question #9.

Q10. In enclosure 7 of DaimlerChrysler's response to ODI's information request no. 9 during RQ03-005, "Change Number (CN) Authority 80722-L08" was mentioned in reference to engineering changes made to the floor shifter assembly on the subject JA and JX vehicles with the introduction of the BTSI (Brake Transmission Shift Interlock) system at MY 2000.

Produce all documents related to, discussing, or documenting CN 80722-L08, including but not limited to, engineering drawings (showing design conditions both before and after the modifications), specification documentation, change history documents, technical descriptions of the changes, communications to suppliers, and any other pertinent documents. If the aforementioned engineering drawings are not available, provide engineering drawings of a current production shifter assembly. If

the engineering drawings do not contain the necessary detail to determine dimensional tolerancing, provide any other information required. Also describe in detail what impact CN 80722-L08, or any other or similar CN, had on the mechanical advantage of the transmission shift mechanisms for the LH and PR vehicle families, if any.

- A10. DaimlerChrysler Corporation has issued a Defect Information Report, complying with the requirements of 49 CFR Part 573, Defect and Noncompliance Reports, for DaimlerChrysler Corporation Recall #C45. As per the agreement reached between DaimlerChrysler Corporation and NHTSA ODI during the December 18, 2003 phone conference, this Defect Information Report in conjunction with the following partial response will satisfy the requirements for this portion of the EA03-011 information request. As per the agreement between DaimlerChrysler and NHTSA ODI, the PR-family (Prowler) of vehicles is no longer considered part of the subject vehicles.

DaimlerChrysler engineering design information, including drawings and illustrations, was reviewed with NHTSA ODI in a December 9, 2003 Technical Review at DaimlerChrysler. The data was subsequently submitted to the NHTSA Office of Chief Counsel on December 10, 2003 with a request for confidential treatment. Per the agreement with NHTSA ODI, this previously supplied information satisfies this request.

- Q11. In enclosure 7 of DaimlerChrysler's response to ODI's information request no. 9 during RQ03-005, "Change Number (CN) Authority 81026-L07" was mentioned in reference to engineering changes made to the shift knob on the subject JA and JX vehicles with the introduction of the BT3I (Brake Transmission Shift Interlock) system at MY 2000.

Produce all documents related to, discussing, or documenting CN 81026-L07, including but not limited to, engineering drawings (showing design conditions both before and after the modifications), specification documentation, change history documents, technical descriptions of the changes, communications to suppliers, and any other pertinent documents. If the aforementioned engineering drawings are not available, provide engineering drawings of a current production shifter assembly. If the engineering drawings do not contain the necessary detail to determine dimensional tolerancing, provide any other information required. Also describe in detail what impact CN 81026-L07, or any other or similar CN,

had on the mechanical advantage of the transmission shift mechanisms for the LH and PR vehicle families, if any.

- A11.** DaimlerChrysler Corporation has issued a Defect Information Report, complying with the requirements of 49 CFR Part 573, Defect and Noncompliance Reports, for DaimlerChrysler Corporation Recall #C45. As per the agreement reached between DaimlerChrysler Corporation and NHTSA ODI during the December 18, 2003 phone conference, this Defect Information Report in conjunction with the following partial response will satisfy the requirements for this portion of the EA03-011 information request. As per the agreement between DaimlerChrysler and NHTSA ODI, the PR-family (Prowler) of vehicles is no longer considered part of the subject vehicles.

DaimlerChrysler engineering design information, including drawings and illustrations, was reviewed with NHTSA ODI in a December 9, 2003 Technical Review at DaimlerChrysler. The data was subsequently submitted to the NHTSA Office of Chief Counsel on December 10, 2003 with a request for confidential treatment. Per the agreement with NHTSA ODI, this previously supplied information satisfies this request.

- Q12.** State the number of sales of each of the following that may have been used in the subject vehicles by component name, part number (both service and engineering/production), model and model year of the vehicle in which it is used and month and year of sale (including the cut-off date for sales, if applicable):

- a.** Floor shifter assembly;
- b.** Ignition-park interlock cable;
- c.** Shift knob;
- d.** All kits required for use in safety recall 98V-183; and
- e.** Any other kits that have been released, or developed, by DaimlerChrysler for use in service repairs to the subject components.

- A12.** DaimlerChrysler Corporation has issued a Defect Information Report, complying with the requirements of 49 CFR Part 573, Defect and Noncompliance Reports, for DaimlerChrysler Corporation Recall #C45. As per the agreement reached between DaimlerChrysler Corporation and NHTSA ODI during the December 18, 2003 phone conference, this Defect Information Report in conjunction with the following partial response will satisfy the requirements for this portion of the EA03-011 information request. As per the agreement between DaimlerChrysler

and NHTSA ODI, the PR-family (Prowler) of vehicles is no longer considered part of the subject vehicles.

As agreed to between DaimlerChrysler and NHTSA ODI, a detailed response to this Question is no longer needed for this information request.

Q13. 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.**

Testing and analysis conducted for this investigation established that excessive plunger travel is the primary characteristic that correlates to a reduction in force needed to override the shifter. This testing has demonstrated that reducing the mechanical advantage of the shifter button in the 2000 model year and beyond vehicles limits the ability to induce excessive plunger travel, thus significantly increasing the load required to defeat the ignition-park interlock system. DaimlerChrysler Corporation's field survey and review of complaints and field reports has established that occurrence of non-functional ignition-park interlock systems in vehicles built in 2000 model year and beyond with the reduced mechanical advantage floor shifter are random and do not imply a defect trend. In addition, it is clear based on review of returned parts from the field that defeated reduced mechanical advantage floor shifter assemblies have been subjected to extreme physical abuse, which is obviously apparent to the operator of the vehicle at the time it occurs. Because of these significant design differences and lack of field input, vehicles built in the 2000 model year and beyond have been excluded from the scope of DaimlerChrysler Corporation Recall #C45.

The Prowler family has been excluded from the scope of DaimlerChrysler Recall #C45 because DaimlerChrysler Corporation's investigation revealed that the shift lever used on the PR vehicle family is significantly shorter than the shift lever used on the JA, JX, and LH vehicle family. This shorter shifter lever design significantly reduces the mechanical advantage of the PR system which limits the amount of force that an operator can input into the ignition-park interlock system.

It should also be noted that DaimlerChrysler's investigation has not identified any complaints or field reports of the alleged condition on the PR vehicle family.

The test data supporting this conclusion was reviewed with NHTSA ODI in a December 9, 2003 Technical Review at DaimlerChrysler and was subsequently submitted to the NHTSA Office of Chief Counsel on December 10, 2003 with a request for confidential treatment.

However, it is DaimlerChrysler's observation that:

- FMVSS 114 does not specify a minimum required load to defeat the ignition-park interlock system. DaimlerChrysler maintains that the original design met the intent of FMVSS 114. In all identified cases, the ignition-park interlock system was permanently damaged due to the application of excessive force to the shifter while the interlock system was locked.
- With the interlock system overpowered, the subject vehicles still provide the owners with the ability to safely park the vehicle. The vehicle transmission can still be placed into the park position and the parking pawl in the transmission is still completely functional.
- The shifter gates remain intact and therefore still provide a positive stop between park and reverse. Therefore, if the vehicle transmission is properly placed in park the gearshift lever cannot be simply "bumped" into reverse. Whether the ignition-park interlock system is intact or has been overcome, the shifter gate requires that the shifter button be depressed in order to move the lever out of the park position.
- In order for a vehicle roll-away incident to occur when the key is not present in the ignition, all of the following conditions must be present: the ignition-park interlock system was previously defeated by an adult, the transmission shift lever is not placed in the park position or is moved from the park position, and the parking brake is not properly applied.
- It is DaimlerChrysler's position that children must not be left unattended in a motor vehicle. Warnings in the subject vehicles owner's manuals reiterate this position. DaimlerChrysler takes every precaution to insure the safety of children; however, it is impossible to eliminate all risks when children are left unattended in a vehicle.