DAIMLERCHRYSLER

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

September 3, 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-213pjk; EA03-023

This document contains an update to DaimlerChrysler Corporation's ("DCC's") referenced inquiry regarding the upper ball joint assemblies in 1998-2003 model year Dodge Durango vehicles and in 1997-2004 Dodge Dakota pickup trucks ("subject vehicles"). By providing the information contained herein, DCC is not waving its claim to attorney work product and attorney-client privileged communications.

Per recent conversations with your office, DCC is providing an updated summary of the reported alleged upper ball joint separations received by DCC since January 22, 2004. This updated summary represents a reasonable and comprehensive search of DCC's normal repositories with the emphasis on capturing reports of alleged wheel separation which may relate to the investigation for the subject vehicle population since the May 11, 2004 EA submission to NHTSA ODI.

In response to NHTSA's PE and EA, DCC performed a thorough investigation into alleged upper ball joint separations in the subject vehicles. After analysis and review of the data retrieved from the investigation, DCC has concluded that there is not a safety-related defect present in the upper ball joints of the subject vehicles. The data retrieved from the investigation revealed several factors (supported in prior submissions) that led DCC to this conclusion. This supplemental data provided further confirms DCC's position.

In summary, for the reasons stated above and based on the data contained in this and prior submissions, it is DCC's assessment that there is not a safety-related defect in the ball joints of the subject vehicles or an unreasonable risk to motor vehicle safety.

Sincerely,

for Stephan J. Speth

Attachment and Enclosure

DaimlerChrysler Corporation
800 Chrysler Drive CIMS 482-00-91
Auburn Hills MI USA 48326-2757

Mr. Jeff Quandt
Reference NVS-213pjk; EA03-023 supplemental data
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In accordance with the verbal direction from Mr. Jeff Quandt, NHTSA ODI Chief, DaimlerChrysler Corporation ("DCC") is providing a summary of the consumer reports received by DCC between January 22, 2004 and July 31, 2004 which allege a separation of the upper ball joint assembly of the subject vehicles. Complaints regarding other attenuated ball joint issues such as tire wear, suspension noise, loose steering, ball joint wear, cost of replacement, or other issues, are not provided.

Reports presented in the attached table are those received by DCC between January 22, 2004 and July 31, 2004. These reports were not provided with the EA 03-023 response in March, 2004 due to the fact that they were received after DCC's January 22, 2004 cutoff date used to prepare the EA response data.

a. From the subject population of 1,998,744 U.S vehicles built through July 31, 2004, there are an additional total of 63 consumer complaints received by DCC between January 22, 2004 and July 31, 2004 which may relate to ball joint separation. Of these complaints, 18 have been investigated by an independent third-party investigator and are noted by the descriptor "SI-CAIR" (Special Investigation – Customer Assistance Inquiry Report). The remaining 45 are designated "CAIR" (Customer Assistance Inquiry Report).

   Following is a summary of the 63 responsive complaints:

   - 19 of the complaints appear to be due to separation of the upper ball joint from the socket. In each of these cases, the upper ball joint appeared to be severely corroded and worn, consistent with other complaints stating premature wear but no separation. These 19 reports represent a complaint rate of 1.06 conditions per 100,000 vehicles.
   - 32 complaints provided to DCC may be related to separation of the upper ball joint assembly, but due to limited information provided and not having the parts or vehicle available to review, no further inspection or conclusions can be drawn regarding these complaints.
   - 9 complaints allege separation of a wheel from the vehicle, but do not include any information regarding a possible cause. No additional information is available and no conclusions can be drawn from these reports.
   - 1 complaint alleged a wheel separation, but was later identified during an independent inspection to have been caused by a preceding vehicle impact.
   - 1 complaint alleged a separation of the upper ball joint assembly, but was later identified during a dealer inspection to have been caused by improper installation of the nut which attached the upper ball joint assembly to the suspension knuckle.
   - 1 complaint suggests wheel separation but lacks conclusive supporting information to confirm any relation to the upper ball joint assembly.

These complaints are summarized in the following table:

Subject Vehicle Population: 1,998,744

Category Description	CAIR	SI – CAIR	Field Reports	VOQs	Total (Unique VINs)
Ball Joint separation	3	16	0	3	20
Alleged Ball Joint Separation - not confirmed	32	0	0	2	30
Alleged Wheel separation – not confirmed	7	2	0	1	8
Wheel separation – due to preceding vehicle accident	1	0	0	0	1
Ball Joint Assembly separated from Knuckle due to retaining nut shy	1	0	0	0	1
Insufficient information available	1	0	0	0	1
Not related/Other	2^/0	2^/0	0/1	4^/0	3^/1
Sub-Total	45	18	1	6	62
Total	63				

A) Reports not related to the alleged defect and not included in total count

b. There is only 1 field report relevant to this investigation.
c. The 18 "SI-CAIR" reports include incidents where a vehicle crash was alleged. There are no fatalities or confirmed personal injuries.
d. None of these reports claim property damage.

As would be expected, the total number of complaints received by DCC since August 2003 has been greatly influenced by media stories relating to this investigation. DCC review of these complaints revealed a dramatic spike in the number of complaints received following national media coverage of the subject ball joint investigation. Additionally, a detailed review of complaint input to DCC after August 2003 and following significant national media coverage indicates that customer awareness has

been increased, driving liberal application of the term ball joint as a causal description for many vehicle related complaints, including many issues not even relating to the front suspension. Based on this DCC believes this quantity of complaints does not accurately represent a specific customer safety problem.

An inclusive review of all complaints reveals that operators of the subject vehicles receive sufficient warning when ball joint service is required. The great majority of the data indicates that separation due to compromised ball joint sealing leading to water intrusion, evacuation of the grease, bearing wear and ultimately grinding corrosion occurs beyond 30,000 miles. It is those vehicles whose operators ignore this warning that have the greatest risk of eventual ball joint separation. Further, if the Owner's Manual maintenance and inspection procedures regarding the ball joint had been followed, it is virtually assured that this situation would be avoided.

Of more than 8000 reports received and reviewed by DCC, there exists no supporting evidence of a safety defect and no confirmation of any personal injuries. Analysis of the reports provided indicates that an overwhelming majority of complaints received relating to ball joints was due to the cost of repair or media related inquiries. From previous responses to NHTSA, 25 of 107 reports of alleged separation appeared to be related to corrosive degradation of the upper ball joint assembly, while the data provided in the table above indicate that an additional 20 of 62 reports provided appear to also be related. While the rate of alleged separations has slightly increased since March 2004 to 2.33c/100,000 vehicles, the rate of confirmed upper separations due to premature wear remains very low. In fact, this rate remains significantly lower than two recent competitive manufacturers' ball joint recall queries which were closed by NHTSA. Even segregating the 2000 model year and newer vehicle population, which contains the majority of the alleged separations, the rate remains below 4.0c/100,000 vehicles, which is also lower than the corresponding rate for two recent competitive manufacturers' ball joint recall queries which were closed by NHTSA. Further, comprehensive survey data provided in previous responses showed analysis further reinforcing that degradation of the upper ball joint to the point of potential separation occurs over a significant period of time.

In summary, for the reasons stated above and based on the data contained in this and prior submissions, it is DCC's assessment that there is not a safety-related defect in the ball joints of the subject vehicles or an unreasonable risk to motor vehicle safety.