

# DAIMLERCHRYSLER

DaimlerChrysler Corporation

Stephan J. Speth

Director

Vehicle Compliance & Safety Affairs

February 21, 2005

Mr. Thomas Z. Cooper, Chief  
Office of Defects Investigation  
National Highway Traffic Safety Administration  
400 Seventh Street, S.W.  
Washington, D.C. 20590

Dear Mr. Cooper:

Reference: NVS-212pco; PE04-081

This document completes DaimlerChrysler Corporation's ("DCC's") response to the referenced inquiry dated January 19, 2004 regarding information concerning side impact airbag experience on 2001-2003 DCC vehicles with a curb weight between 2500 and 3500 pounds. In reaching our analysis and conclusions, and by providing the information contained herein, DCC is not waiving its claim to attorney work product and attorney-client privileged communications.

DCC's review of complaints, field reports, and warranty claims has not identified any issues with the side impact airbag system deployment characteristics for the subject peer vehicles. The absence of these issues can be attributed to the design philosophy and adherence to stringent design standards, combined with comprehensive vehicle testing programs whereby vehicles undergo hundreds of thousands of miles of durability testing in a variety of environmental conditions prior to vehicle volume production. Additionally, DCC's airbag deployment crash sensing systems are rigorously tested to ensure proper airbag deployments. DCC has received only four unique reports in the peer population with allegations relating to side impact airbag inadvertent deployment. This very small number of complaints comes from a population of over 370,000 subject peer vehicles.

In summary, DCC's review of this information has not found any indication of side impact airbag inadvertent deployment concern with the subject peer vehicles.

Sincerely,



Stephan J. Speth

Attachments and Enclosures

**Q1. State, by model and model year, the number of subject peer vehicles DaimlerChrysler has manufactured for sale or lease in the United States. If there are multiple side air bag system designs or versions for a given subject peer vehicle, please identify under section "e." Separately, for each model subject vehicle manufactured to date by DaimlerChrysler, state the following:**

- a. Vehicle identification number (VIN);**
- b. Make;**
- c. Model;**
- d. Model Year;**
- e. Airbag system model version (if more than one);**
- f. Date of manufacture**
- g. Date warranty coverage commenced; and**
- h. 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 compatible format, entitled "PRODUCTION DATA."**

**A1. DCC has identified four vehicle lines manufactured by DCC that meet the subject peer vehicle definition which includes side impact airbags and a curb weight between 2500 and 3500 pounds. A summary by make, model, and model year is included in the table below.**

<b>Chrysler PT Cruiser</b>	<b>PT44</b>	<b>133,653</b>	<b>88,071</b>	<b>44,361</b>
<b>Dodge &amp; Plymouth Neon</b>	<b>PL</b>	<b>7,026</b>	<b>10,963</b>	<b>2,680</b>
<b>Chrysler Sebring Sedan and Dodge Stratus Sedan</b>	<b>JR41</b>	<b>15,099</b>	<b>9,395</b>	<b>3,095</b>
<b>Chrysler Concorde, 300M, LHS, Dodge Intrepid</b>	<b>LH</b>	<b>25,335</b>	<b>24,110</b>	<b>7,531</b>

**The detailed response that lists the market production data is provided in Enclosure 1 as a Microsoft Access 2000 table, titled "PRODUCTION DATA."**

It should be noted that information pertaining to the Dodge Stratus Coupe and Chrysler Sebring Coupe, manufactured for DCC by Mitsubishi Motor North America (MMNA), is not included in this response. MMNA has agreed to respond to NHTSA in regard to these vehicles if applicable.

- Q2. State the number of each of the following, received by DCC, or of which DCC is otherwise aware, which relate to, or may relate to, the alleged defect in the subject peer 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 (including own vehicle);**
  - e. Third-party arbitration proceedings where DCC is or was a party to the arbitration; and**
  - f. Lawsuits, both pending and closed, in which DCC 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). Identify reports that have a duplicate with either other mfg reports/claims or with ODI.

In addition, for items "b" through "f," 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 along with any photographs and any control module diagnostic result/readout/printout (along with explanation/description). For items f and g 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.

- A2.** The following summarizes the non-privileged reports received by DCC that relate to, or may relate to, the alleged condition in the subject peer vehicles. DCC has conducted a reasonable and diligent search of our normal repositories of such information.
- a. There are a total of 5 customer complaints that contain 4 unique vehicles that may relate to the alleged condition.
  - b. There are 2 field reports that contain 2 unique vehicles that may relate to the alleged condition. Both field reports have associated complaints in the DCC system.
  - c. There are two claims alleging minor injury that are responsive to this inquiry.
  - d. There are zero reports that allege property damage that are responsive to this inquiry.
  - e. There are no third-party arbitration proceedings involving DCC that are responsive to this inquiry.
  - f. One lawsuit and one legal claim are responsive to this inquiry. Both have a related customer complaint in the DCC system.

Copies of all documents within the scope of Request No. 2 are provided in Enclosure 2 – COMPLAINTS AND FIELD REPORTS, on the enclosed CD-ROM.

- Q3.** State, by model and model year, a total count for all of the following categories of claims, collectively, that have been paid by DCC to date 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.

Provide this information in a Microsoft Excel Table, or a compatible format, entitled "WARRANTY DATA COUNT."

- A3.** The detailed response that lists the warranty claims is provided in Enclosure 3 as a Microsoft Excel table, titled "WARRANTY DATA COUNT".

It should be noted that it is impossible to determine the exact specifics of any particular warranty repair. There are other random issues that are not related to this alleged condition, yet still trigger replacement of the subject components.

- Q4.** Describe in detail the search criteria used by DaimlerChrysler to identify the claims identified in response to Request No. 3 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 peer vehicles. State, by make and model year, the terms of the new vehicle warranty coverage offered by DaimlerChrysler on the subject peer vehicles (i.e., the number of months and mileage for which coverage is provided and the vehicle systems that are covered) and if it covers inadvertent side-airbag deployments (without an actual side crash, but sensors did sense a shock pulse). Describe any extended warranty coverage option(s) that DaimlerChrysler offered the subject peer vehicles and state by option, model, and model year, the number of vehicles that are covered under such extended warranty and if it covers inadvertent side-airbag deployments.

- A4.** The search criteria including labor operation and problem codes used by DCC to identify claims responsive to Request No. 3, can be found in the charts below:

Module, Side Airbag Control – Test & Replace, Right or Left	08-45-08-02/03
Module, Airbag/Occupant Restraint Control	08-45-09-01
Module, Side Airbag Replace, Front Seat, Right or Left	23-20-29-02/03
Module, Side Airbag Replace, Side Curtain, Right or Left	23-20-29-10/11

X6	Terminals Damaged	SE	Shortage and/or error
18	Circuit Open	11	Broken or Cracked
48	Grounded or Shorted	61	Intermittent Operation
58	Internal Defect	51	Improperly Installed
83	Connection Loose	ML	Malfunction Indicator Lamp On

The standard warranty offered on all subject vehicles was 36 month / 36,000 miles. There is no extended warranty coverage options related specifically to the subject components. Owners may have purchased additional warranty coverage through third-party providers not affiliated with DCC; this warranty data is not available to DCC and is not included in this response.

**Q5. Provide a table showing the following information concerning the side-impact airbag system in the subject peer vehicles by model and model year:**

- a. type of airbag system (thorax, head, curtain or combination thereof);
- b. location of the seating position at which the side airbag system is installed;
- c. the number of side airbags at each of these seating positions; and
- d. bag location (seat mounted, door mounted, etc.)

**A5.**

2001 – 2003 PL	Thorax/head airbag	Front	1	Front seat mounted
2001 – 2003 PT44	Thorax/head airbag	Front	1	Front seat mounted
2001 – 2003 JR41	Head curtain	Front and rear	1	Headliner – A pillar to C pillar
2001 – 2003 LH	Thorax/head airbag	Front	1	Front seat mounted

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**ATTACHMENT**

**Q6. For each model, model year of the subject peer vehicles, identify the supplier of the side impact crash sensing system and electronic restraint module. Please provide a complete street address, contact name, and telephone number for each supplier identified.**

**A6.**

2001 – 2003 PL	SIACM (B-pillar)	TRW	
2001 – 2002 PT44	SIACM (B-Pillar)	TRW	[REDACTED] Farmington Hills, MI [REDACTED]
2001 – 2002 JR41	SIACM (B-Pillar)	TRW	[REDACTED]
2001 – 2003 LH	SIACM (B-pillar)	TRW	
2003 JR41 2003 PT44	ORC with Remote Sensor (B-pillar)	Bosch	[REDACTED] Farmington Hills, MI [REDACTED] [REDACTED]

SIACM – Side Impact Airbag Control Module  
 ORC – Occupant Restraint Controller