

DAIMLERCHRYSLER

DaimlerChrysler Corporation

Stephan J. Speth

Director

Vehicle Compliance & Safety Affairs

July 15, 2005

Mr. Richard Boyd, Chief
Medium & Heavy Duty Vehicle Division
Office of Defects Investigation
National Highway Traffic Safety Administration
U.S. Department of Transportation
400 Seventh Street, SW
Washington, D.C. 20590

Reference: NVS-214gtb; EA05-007 & 008

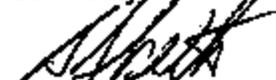
Dear Mr. Boyd,

This document contains DaimlerChrysler Corporation's ("DCC") response to the referenced inquiry dated June 10, 2005 regarding information concerning the tailgate support cables installed in 1998 – 2004 DCC vehicles. 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, warranty claims, and part sales has not identified any significant issue with the integrity or performance characteristics of the tailgate support cables for the subject vehicles. The absence of 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. DCC has received only a small number of complaints alleging tailgate cable breakage out of a subject population of well over 3.8 million vehicles.

In summary, DCC's review of this information has found no indication of any tailgate support cable performance concerns for the subject peer vehicles.

Sincerely,



Stephan J. Speth

Attachment and Enclosures

- Q1. Identify by model, model year, and by manufacturing location, the number of subject vehicles (vehicles equipped with tailgate support cables) that Daimler Chrysler has manufactured for sale or lease in the United States since model year 1998.**

Provide the table in Microsoft Access or Excel 2000, or a compatible format, entitled "Request Number 1 – Daimler Chrysler, Production Information."

- A1. During the 1998 to 2004 model years, DaimlerChrysler Corporation ("DCC") manufactured several lines of pick-up trucks equipped with tailgate support cables. These vehicles are referred to as the AN, BE, BR, and DR models. The total number of subject vehicles manufactured for the US market within this time period is 3,830,357.**

FAMILY	MAKE/MODEL	MODEL YEAR(s)	TOTAL US VOLUME
AN	Dodge Dakota	1998 - 2004	1,002,546
BE	Dodge Ram Quad Cab	1998 - 2002	1,198,528
BR	Dodge Ram Regular Cab	1998 - 2002	416,398
DR	Dodge Ram Regular Cab Dodge Ram Quad Cab	2002 - 2004	1,212,885

The detailed response that lists the production data is provided in Enclosure 1 as a Microsoft Access 2000 compatible format, entitled "DCC Production Information".

- Q2. State the number of each of the following, received by Daimler Chrysler, or of which Daimler Chrysler is otherwise aware, which relate to, or may relate to, the alleged defect (*) in the subject vehicles received by Daimler Chrysler since January 1, 1998, pertaining to:**
- a. Consumer complaints, including those from fleet operators;**
 - b. Field reports, including dealer field reports;**
 - c. Reports involving an 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; and**

- e. Third-party arbitration proceedings where Daimler Chrysler is or was a party to the arbitration; and
- f. Lawsuits, both pending and closed, in which Daimler Chrysler is, or was, a defendant or codefendant.

(*) ODI has defined the alleged defect as "tailgate support cable breakage." ODI requests that Daimler Chrysler confine its investigation to complaints that are consistent with this failure mode. Reports of tailgate cable breakage may be described by such terms as, "broken," "fractured," "cracked," "cut," "sheared," "separated," "inoperative," etc. Please exclude complaints pertaining to tailgate cables for such issues as cosmetic appearance, fitment, accidental damage, etc. that do not indicate a broken or compromised tailgate support cable or the imminent possibility that the tailgate support cable may lose load-carrying integrity.

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 are to be counted as a field report and a consumer complaint).

In addition, for items "e" through "g," provide a summary description of the alleged problem and causal and contributing factors and Daimler Chrysler's assessment of the problem, with a summary of the significant underlying facts and evidence. 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.

Provide this information in Microsoft Access or Excel 2000, or a compatible format, entitled "Request Number Two – Complaint Summary Data."

- A2. The following summarizes the non-privileged reports received by DCC that relate to, or may relate to, the alleged condition in the subject vehicles. DCC has conducted a reasonable and diligent search of our normal repositories of such information.
 - a. There are a total of 93 customer complaints (including 6 NHTSA VOQs) distributed over 4 different vehicle families, comprising over 3.8 million vehicles, the oldest of which are now 7 years old. The 87 other (non-VOQ) customer complaints contain 82 unique vehicles.

The original list of VOQ's received from NHTSA contained 6 VOQ's. However, 2 VOQ's have insufficient evidence to relate to this issue. Two of the remaining 4 VOQ's have related customer complaints in the DCC system. The remaining 2 VOQ's are unique reports which do not have related complaints in the DCC system.

- b. There are 6 field reports that contain 7 unique vehicles.
- c. Of the 87 complaints received by DCC, 4 contain 6 allegations of injury. There are no fatalities that are responsive to this inquiry.
- d. There are no 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. There is 1 legal claim against DCC, or notice received by DCC, that is responsive to this inquiry. This claim has a corresponding customer complaint in the DCC system. There are no lawsuits, pending or closed, involving DCC that are responsive to this inquiry.

This information is provided in Enclosure 2 in Excel 2000 compatible format, entitled "Complaint Summary Data".

Q3. Separately, for each item (complaint, report, claim, notice, or matter) within the scope of the response to Request No. 2, state the following information:

- a. Daimler Chrysler'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 property damage is alleged;
- j. Number of alleged injuries, if any; and
- k. Number of alleged fatalities, if any.

Provide this information in Microsoft Access or Excel 2000, or a compatible format, entitled "Request Number Three – Complaint Details."

- A3. The detailed response that lists the customer complaints and field reports, from Request No. 2, as requested in Items a. through k. is provided in Enclosure 3 as a Microsoft Access 2000 table, entitled "Request Number Three Complaint Details".**
- Q4. State, by model and model year, a total count for all of the following categories of claims, collectively, whether reimbursed, adjusted, or not reimbursed by Daimler Chrysler 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.**

(*) ODI has defined the alleged defect as "tailgate support cable breakage." ODI requests that Daimler Chrysler confine its investigation to complaints that are consistent with this failure mode. Reports of tailgate cable breakage may be described by such terms as, "broken," "fractured," "cracked," "cut," "sheared," "separated," "inoperative," etc. Please exclude complaints pertaining to tailgate cables for such issues as cosmetic appearance, fitment, accidental damage, etc. that do not indicate a broken or compromised tailgate support cable or the imminent possibility that the tailgate support cable may lose load-carrying integrity.

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

- a. Daimler Chrysler's claim number;**
- b. Vehicle owner or fleet name (and fleet contact person) and telephone number;**
- c. VIN;**
- d. Model Year;**
- e. Make;**
- f. Model;**
- g. Repair date;**
- h. Vehicle mileage at time of repair;**
- i. Repairing dealer's or facility's name, telephone number, city and state or ZIP code;**
- j. Labor operation number;**
- k. Problem code;**

- l. Replacement part number(s) and description(s);**
- m. Concern stated by customer; and**
- n. Comment, if any, by dealer/technician relating to claim and/or repair.**
- o. Claim disposition (reimbursed, adjusted, or not reimbursed).**

Provide this information in Microsoft Access 2000, or a compatible format, entitled "Request Number Four – Warranty Information."

- A4. The chart below is a count of claims involving replacement of one or both of the tailgate support cables, separated by model and model year as requested.**

Number of claims per Model Year	AN	BE	BR	DR
1998	96	1048	669	-
1999	53	910	450	-
2000	65	176	136	-
2001	96	739	344	-
2002	58	133	21	114
2003	25	-	-	184
2004	13	-	-	143

It is impossible to determine what any particular warranty claim is for. There are other random issues that are not related to this alleged condition, yet still trigger replacement of the subject components. DCC has concluded that the warranty cannot be used to determine any trend related to the alleged condition.

The detailed response that lists the warranty claim details, as requested in items a. through o. is provided in Enclosure 4 as a Microsoft Access table, titled "Request Number Four Warranty Information".

- Q5. Describe in detail the search criteria used by Daimler Chrysler 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 of the new vehicle warranty coverage offered by Daimler Chrysler 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) that Daimler Chrysler 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.

- A5. The search criteria used by DCC to identify claims to Request No. 4 can be found in the chart below:

Hinge/Cable, Liftgate/Tailgate/Deck Lid Replace Upper/Lower RH	23-40-39-02
Hinge/Cable, Liftgate/Tailgate/Deck Lid Replace Upper/Lower LH	23-40-39-03
Cable, Liftgate/Tailgate/Deck Lid Replace Cable-One	23-40-39-04
Hinge/Cable, Liftgate/Tailgate/Deck Lid Replace Hinge/Cable- Each Additional	23-40-39-50

11	Broken or Cracked	Cable
BX	Broken Component	Cable

It should be noted that the labor operations above may have been used for claims involving replacement of the tailgate hinge only. Therefore, the claim data was filtered to include only those that involved replacement of one or both of the tailgate cables.

The standard warranty provided by DCC for the 1998-2004 MY AN, BE, BR, and DR vehicles was 3 years or 36,000 miles. Additionally, DCC dealers often perform repairs at no charge to the customer on out-of-warranty vehicles as a goodwill gesture. Customers can also purchase additional extended service contracts at their option through third-party providers not affiliated with DCC. This service contract data is not available to DCC and is not include in this response.

- Q5. List all tailgate support cable part number(s) or the part number of subassemblies containing a tailgate support cable which were sold as replacement parts for the vehicles listed in response to Request No 1. and state the quantity of each aftermarket or replacement tailgate support cable that Daimler Chrysler has sold by year from 1998 to the present.**
- A6. A chart listing the tailgate support cables sold as replacement parts for the subject vehicles can be found in Enclosure 5 as a Microsoft Excel Spreadsheet, entitled "Replacement Part Sales".

Mr. Richard P. Boyd
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ATTACHMENT

In summary, DCC's review of complaints, field reports, warranty claims, and part sales has not identified any issue with the subject vehicle tailgate support cables. DCC believes the comprehensive development testing and vehicle durability testing that each new vehicle must complete prior to volume production has greatly contributed to the superior performance of the tailgate support cables.