

DAIMLERCHRYSLER

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September 29, 2006

Ms. Kathleen C. DeMeter, Director
Office of Defects Investigation
National Highway Traffic Safety Administration
400 Seventh Street, S.W.
Washington, D.C. 20590

DEFECTS INVESTIGATION

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

Dear Ms. DeMeter:

Reference: NVS-214pk, EA05-017

This document completes DaimlerChrysler Corporation's ("DCC's") response to the referenced inquiry dated August 28, 2006 regarding information concerning steering knuckle failures. During conversations with Peter Kivett the subject peer vehicles were defined as 2003 through 2007 Dodge Durango 4 X 4, Chrysler Aspen 4 X 4 and Dodge Ram 2500 and 3500 4 X 4 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 owner complaints, warranty claims, field reports, and legal claims has not identified any issue with the steering knuckle performance 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. DCC has received only a very small number of complaints relating to steering knuckle performance. This very small number of complaints comes from a population of over 830,000 of the subject peer vehicles, and most of those complaints can be attributed to prior impact which caused the steering knuckle to fracture.

In summary, DCC's review of this information has identified no indication of any steering knuckle performance issue with the subject peer vehicles.

Sincerely,


Stephan J. Speth

Attachments and Enclosures

1. State the population for the subject peer vehicles by model and model year.

Note: Unless otherwise indicated in the question response, all data contained in this response is through September 1, 2006.

A1)

Model	2003 M.Y.	2004 M.Y.	2005 M.Y.	2006 M.Y.	2007 M.Y.
Dodge Ram 2500 and 3500 4 X 4	112,295	132,834	114,862	154,011	15,600
Dodge Durango 4 X 4	81,135	88,864	73,995	50,454	1,987
Chrysler Aspen 4 X 4	0	0	0	0	1,579

2. State the number and provide copies of all of the following information that relates or potentially relates to the subject condition in the subject vehicles. This should include all information in Daimler Chrysler's possession or control or of which it is otherwise aware.

- a. owner complaints;
- b. repair shop claims;
- c. field reports;
- d. crash/injury incident reports;
- e. subrogation claims;
- f. lawsuits; and
- g. third-party arbitration proceedings where Daimler Chrysler is a party to the arbitration.

List and collate your response separately for each category ("a" through "g") by date the incident was filed with Daimler Chrysler. Provide for each item in this response the incident date, model, model year, wheel size, problem code, vehicle identification number, repair mileage, property damage, and injuries.

For "d," identify all crashes by date, location, and names of parties involved. For "f," identify all the lawsuits by caption, court, and docket number. Provide a separate analysis and description of each item "e" through "g" identifying the vehicle (by model year, build date, and VIN) and the vehicle owner (by name, address, and telephone number). Include all police reports that relate to the subject condition known to Daimler Chrysler. Clearly describe the sequence of events leading up to any accident(s), the approximate vehicle speed, approximate vehicle mileage, and any personal injuries, vehicle damage, or property damage that may have occurred.

Provide all related material and information that relate to the subject condition even if Daimler Chrysler has not verified it. Indicate if no information exists for any category.

The following summarizes the reports of events identified by DaimlerChrysler that relate to, or may relate to the subject condition. DCC has conducted a reasonable and diligent search of the normal repositories of such information. The copies of the reports are provided in Enclosure 01-“Question 1 Data”.

- A2a) There are eight Customer Complaints, involving seven unique VINs that relate or may relate to the subject condition. Six Customer Complaint incidents were determined to be the result of an impact that caused the knuckle to fracture.
- A2b) The Repair Shop Claim information is provided in the response to Question 3.
- A2c) There is one Field Report that relates or may relate to the subject condition. The Field Report incident was determined to be the result of an impact.
- A2d) There are five Crash/Injury Incident Reports, involving four VINs, that relate or may relate to the subject condition. Four of the Crash/Injury Incident Report incidents were determined to be the result of an impact that caused the knuckle to fracture. There are no additional unique VINs that have not been provided in A2a.
- A2e) There are no Subrogation Claims that relate or may relate to the subject condition.
- A2f) There is one Lawsuit that relates or may relate to the subject condition. The Lawsuit incident was determined to be the result of an impact that caused the knuckle to fracture. There are no additional unique VINs that have not been provided in A2a.
- A2g) There are no Third-Party Arbitration Proceedings that relate or may relate to the subject condition.

- 3. State, by model and model year, a total count for all of the following categories of claims, collectively, that have been paid by Daimler Chrysler to date that relate to, or may relate to, the subject condition for the subject peer vehicle platform: 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.**

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. Repair date;
- e. Vehicle mileage at time of repair;
- f. Repairing dealer's or facility's name, telephone number, city and state or ZIP code;
- g. Labor operation number;
- h. Problem code;
- i. Replacement part number(s) and description(s);
- j. Whether the vehicle was towed to the dealer for the repair (y/n);

- k. **Secondary component damage (y/n) - Whether there were coincident repairs to secondary components that can be damaged when steering knuckle fracture occurs. For example, repairs to the following components at the same front wheel position as the subject component on or about the same date as the subject component repair (± 2 days): brake rotor, brake hose, axle (four-wheel drive), body damage, tie rod, etc. (state the specific criteria used by Daimler Chrysler);**
- l. **Concern stated by customer; and**
- m. **Comment, if any, by dealer/technician relating to claim and/or repair.**

Provide this information in Microsoft Access 2000, or a compatible format, entitled "WARRANTY DATA." See Enclosure 1, Data Collection Disc, for a pre-formatted table which provides further details regarding this submission.

A3) The following chart summarizes DCCs response by model and model year. The above requested warranty claim summary information is provided in Enclosure 02-"Warranty Data".

Model	2003 M.Y.	2004 M.Y.	2005 M.Y.	2006 M.Y.	2007 M.Y.
Dodge Ram 2500 and 3500 4 X 4	29	40	22	5	0
Dodge Durango 4 X 4	28	12	7	1	0
Chrysler Aspen 4 X 4	-	-	-	-	0