DAIMLERCHRYSLER

3/28/06

February 20, 2006

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

Mr. Jeffrey L. Quandt
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-213cla; EA05-018

This document contains DaimlerChrysler Corporation's ("DCC") response to the referenced inquiry regarding the 2004 through 2005 Dodge Durango sport utility vehicles and Ram pickup trucks equipped with 5.7L V8 engines that have been manufactured for sale or lease in the United States. By providing the information contained herein, DCC is not waiving its claim to attorney work product and attorney-client privileged communications.

DCC has not identified a single causal factor that may be responsible for the reported stalling events occurring in the 2004 and 2005 MY Dodge Durango and Dodge Ram pickup trucks equipped with 5.7L engines. All, or nearly all, of these vehicles were evaluated by our trained dealership technicians, and the alleged condition was not repeatable nor did it leave any fault codes identifying a problem with the subject component. All of the vehicles in the population are covered by DCC's 8 year / 80,000 emission system warranty, which will correct free of charge any identified issue with the powertrain control module (PCM).

DCC has not identified a single failure mechanism responsible for the alleged stalling events. Based on calibration development experience, most stalling conditions can be explained by idle undershoot during transient load and/or environmental conditions. The field input suggests that stalling due to calibration related issues does not typically occur during steady state operation with a warm engine. In addition, problems with any of the hardware providing input to the engine control software would generate a fault code and/or illuminate the MIL, which is not the case.

With respect to the alleged complaints of stalling while driving in which no causal condition has been identified, 91% have reported immediate restart. None of the reported stalling events - whether at low, idle or steady state speeds – has resulted in injury, death or property damage. Moreover, the three crashes now being reported cannot be confirmed to have resulted from a stalling event

The fact and data contained in this response illustrates a significantly lower frequency of stalling reports and little or no safety risk in the subject population compared to other NHTSA stalling investigations. The corrective measures that have been taken to date have

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significantly reduced the number of occurrences of alleged stalling events in those vehicles where no causal condition could be identified. Not a single stalling event involving death, injury or property damage has been reported to DCC or the agency. Accordingly, DCC believes there is no unreasonable risk to motor vehicle safety and this investigation should be closed.

Sincerely,

for Stephan J. Speth

Attachment and Enclosures

ATTACHMENT

1. **State, by model and model year, 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. **Make;**
   c. **Model;**
   d. **Model Year;**
   e. **Date of manufacture;**
   f. **Date warranty coverage commenced; and**
   g. **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 2003, or a compatible format, entitled "PRODUCTION DATA."

A1. The chart below lists the production volumes for 2004 and 2005 MY Dodge Durango sport utility vehicles and Dodge Ram pickup trucks with 5.7L V8 engines that have been manufactured by DaimlerChrysler Corporation ("DCC") for sale or lease in the United States through December 28, 2005.

Vehicle Type	2004 MY	2005 MY	Total
Durango	63,244	47,125	110,369
Ram	221,885	162,879	384,764
Total Vehicle Volume = 495,133			

The detailed response listing the production data as requested in items a. through g. is provided in Enclosure 1 as a Microsoft Access 2000 table, titled "PRODUCTION DATA".

2. **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. **Reports involving a stall, 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;**
   e. **Property damage claims; and**

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f. Third-party arbitration proceedings where DaimlerChrysler is or was a party to the arbitration; and

g. Lawsuits, both pending and closed, in which DaimlerChrysler is or was a defendant or codefendant.

For subparts "a" through "e" 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).

In addition, for items "c" through "g," 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. 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 vehicles. DCC has conducted a reasonable and diligent search of our records kept in the ordinary course of business for such information. Please note that only complaints, reports, etc. that were reported between June 9, 2005 and December 28, 2005 are included in the summary below. Any complaints, reports, etc. that were received prior to June 9, 2005 have previously been reported in PE05-027.

a. There are a total of 232 customer complaints (181 unique VINs) that may be related to the alleged condition based on text within the complaint narrative showing that the vehicle stalls while driving. DCC's analysis shows that these complaints are likely due to multiple causes, where any cause has been identified.

b. There are a total of 263 field reports (254 unique VINs), of which 8 are from a fleet operator, that may be related to the alleged condition based on text within the complaint narrative showing that the vehicle stalls while driving.

c. There are no reports involving an injury or fatality, and there are 3 legal claims, one of which is also a consumer complaint, involving a crash that relate or may relate to the alleged defect in the subject vehicles. Two of the incidents were minor crashes in which very little damage resulted to the vehicles. Two of the cases mentioned loss of steering and braking which was the cause of the accidents. DCC maintains that, in the case of a stall, the operator would have the ability to steer and that the brakes would operate normally for at least one application of the brake pedal before additional force would be needed to operate brakes without assist.

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d. There are no reports involving a stall that are based on claims against DCC involving a death or injury or notices received by DCC alleging or proving that a death or injury was caused by a possible defect in a subject vehicle.

e. There are no reports that alleged property damage that are responsive to this inquiry. For the purposes of this response, "property damage" is defined as any non-vehicle component that was allegedly damaged during the reported incident.

f. There are no third-party arbitration proceedings where DCC is, or was, a party to the arbitration, that are responsive to this inquiry.

g. There are 32 legal claims and 14 lawsuits where DCC is, or was, a defendant or codefendant, that are responsive to this inquiry.

In summary, there are a total of 541 non-VOQ field inputs, of which 446 are unique vehicles.

Subject Vehicle Population 495,133					
Category Description	**CAIR**	**Field Reports**	**Claims/Lawsuits**	**VOQ's**	**Total Unique VINS**
Steady State Stalls > than 15 MPH	42	24	5/3	6	57
Low Speed Stalls < than 15 MPH	36	94	11/3	44	114
Stalls – garage shift, idle or while stopped	27	18	7/1	3	46
Indeterminate [1]	109	99	5/4	35[3]	179
Not related [2]	18	28	4/3	11[4]	50

[1] May or may not be related to the subject component. Due to insufficient information, DCC was unable to categorize these reports.
[2] Although these fit the definition of the alleged defect, further analysis determined that these reports do not involve the subject component.
[3] No VIN for 19 of these,
[4] 10 are not within the scope and 1 was a no start (not a stall while driving)

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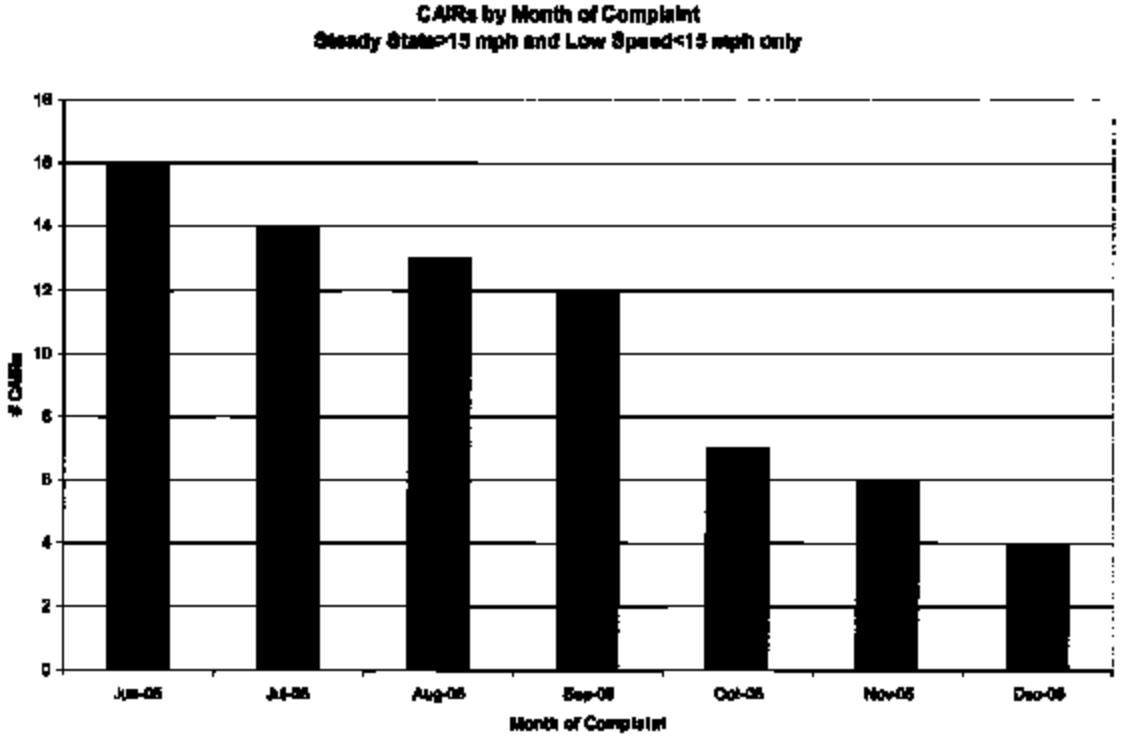
The chart below reflects CAIR input for steady state and low speed stall allegations received between June 1 and December 28, 2005. This data shows an overall complaint rate that is low and clearly decreasing.



3. **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; and**
   l. **Number of alleged fatalities, if any.**

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Provide this information in Microsoft Access 2003, or a compatible format, entitled "REQUEST NUMBER TWO DATA."

A3. The information requested in items a. through l, is provided in the detailed response to Question No. 2, Enclosure 2, as part of a Microsoft Access 2000 table, and titled "REQUEST NUMBER TWO DATA.

4. Produce copies of all documents related to each item within the scope of Request No. 2. Organize the documents separately by category (i.e., consumer complaints, field reports, etc.) and describe the method DaimlerChrysler used for organizing the documents.

A4. Copies of all documents within the scope of Question No.2 are provided in Enclosure 3 – CONSUMER COMPLAINTS, FIELD REPORTS, LEGAL CLAIMS AND LAWSUITS.

5. 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 for good will services that were provided; field, zone, or similar adjustments and reimbursements; and warranty claims or repairs made in accordance with any technical service bulletin or customer satisfaction campaign.

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

a. DaimlerChrysler'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 there is a coincident claim for towing (within one week of the claim relating to the alleged defect);
k. Concern stated by customer; and
l. Comment, if any, by dealer/technician relating to claim and/or repair.

Provide this information in Microsoft Access 2003, or a compatible format, entitled "WARRANTY DATA."

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A5. There are eight applicable labor operation codes (LOPs) that may apply to the alleged condition. The claims by vehicle count for the 2004 MY through 2005 MY Dodge Durango sport utility vehicles and Dodge Ram pickup trucks with 5.7L V8 engines that have been manufactured for sale or lease in the United States are shown in the tables below: Note that the warranty summary below reflects all claims through December 28, 2005, that have not already been reported in PE05-027 response.

Labor Operation Code	2004 MY	2005 MY	Total Claims
08-19-06-01	56	146	202
08-19-06-02	124	0	124
08-19-06-50	0	0	0
08-19-06-94	0	0	24

The LOPs in the above table are LOPs that are for either PCM replacement, PCM program, or to check/adjust the PCM. There are a number of reasons for PCM service, not solely for complaints due to the alleged condition.

08-19-48-99* (TSB 18-002-05)	903	396	1,299

* **Note:** LOP 08194899 is the LOP solely associated with TSB 18-002-05. This TSB was issued mainly to address passenger compartment resonance (boom). In addition, it contains software improvements to address rough idle. It is impossible to determine which claims, if any, may be related to the alleged condition.

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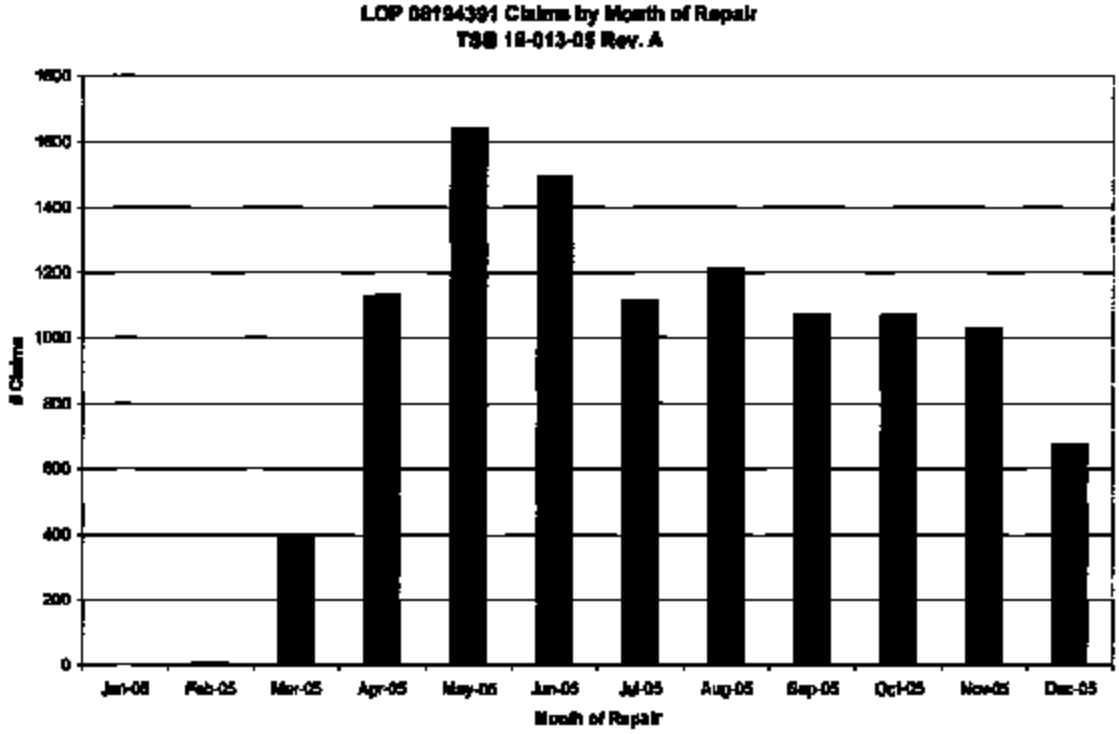
Labor Operation Code	2004 MY	2005 MY	Total Claims
08-19-43-91** (TSB 18-013-05)	2764	2729	5,493

** **Note:** LOP 08194391 is the LOP solely associated with TSB 18-013-05 Rev.A. This TSB was issued to address idle fluctuations, rough idle and MIL illumination, but may have been applied by service personnel to vehicles to address, among other things, reports of stalling while driving. It is impossible to determine which claims, if any, may be related to the alleged condition.



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Labor Operation Code	2004 MY	2005 MY	Total Claims
85-41-08-00*** (Electrical Diagnostic)	579	531	1,110
85-41-09-00*** (Engine Diagnostic)	149	203	352

*** **Note:** LOPs 85410800 (Electrical) and 85410900 (Engine) are generic diagnostic LOPs that are charged when no repair is made, but to compensate the dealer for diagnostic time. Any complaint involving the electrical or engine system could fall under these two LOPs, the vast majority of which do not involve stalling. The percentage of the claims associated with the stall failure code, specifically Y2, is currently only 2.8% of the electrical diagnostic LOP and 7% of the engine diagnostic LOP. Note that complaints other than stall while driving fall under this failure code (i.e., no starts, start & stall, stalling at idle, etc).

DCC's investigation revealed that only 186 of the over 2,600 warranty narratives may be related to the alleged condition.

There were only 17 towing claims within a one week period of all of the warranty claims reported. Follow up investigation with dealer phone calls revealed that 14 claims of the 17 were not serviced to address a stalling while driving complaint. Additionally, several of these vehicles had the TSB, #18-013-05 Rev. A, applied, even though there had been no complaint of a stall or any other type of driveability issue. Often times when a vehicle is brought into a dealership for service, the technicians will search for any TSBs that are applicable to the vehicle and apply them, even though the complaint may not be related to the issue that a given TSB would address.

DCC's warranty system is designed to compensate dealers for repairs made, and cannot be reliably used to determine any trend related to the alleged condition. It is impossible to determine the reason for each particular warranty claim. There are other random issues that are not related to the alleged condition, yet may still trigger replacement of the subject components. The warranty claims that are being submitted are what DCC has deemed to be representative of claims that may relate to the alleged condition.

The detailed response that lists the warranty claims as requested in Items a. through l. is provided in Enclosure 4 as a Microsoft Access 2000 table, titled "WARRANTY DATA". Please note that this data reflects all claims paid through December 28, 2005 that had not already been reported in PE05-027.

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6. **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) 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. The search criteria used by DCC to identify claims to Question No. 5 can be found in the chart below:

Labor Operation Code	Description
08-19-06-01	Replace powertrain/trans control module – All engines
08-19-06-02	Replace powertrain/trans control module – 5.7L only
08-19-06-50	Program generic powertrain/trans control module with software
08-19-06-94	Module, Powertrain/trans control (NGC3): Check and adjust
08-19-43-91	Reprogram control module: Check and adjust
08-19-48-99	Reprogram control module: Check and adjust
85-41-08-00	Diagnostic LOP: electrical
85-41-09-00	Diagnostic LOP: engine

Note: The following table contains the problem codes that relate or may relate to the alleged condition, for all of the Labor Operation codes in the above table.

Problem Codes	14	15	48	58	83	DM	DO	DR	FM	NP	PI	UC	Y2	Y4	YF	YH
LOP Qty	0	24	0	0	0	0	84	0	6792	110	48	941	235	66	115	189

Descriptions for each of the problem codes for the referenced labor operations are provided below. As stated above, DCC cautions against drawing any conclusions from warranty data.

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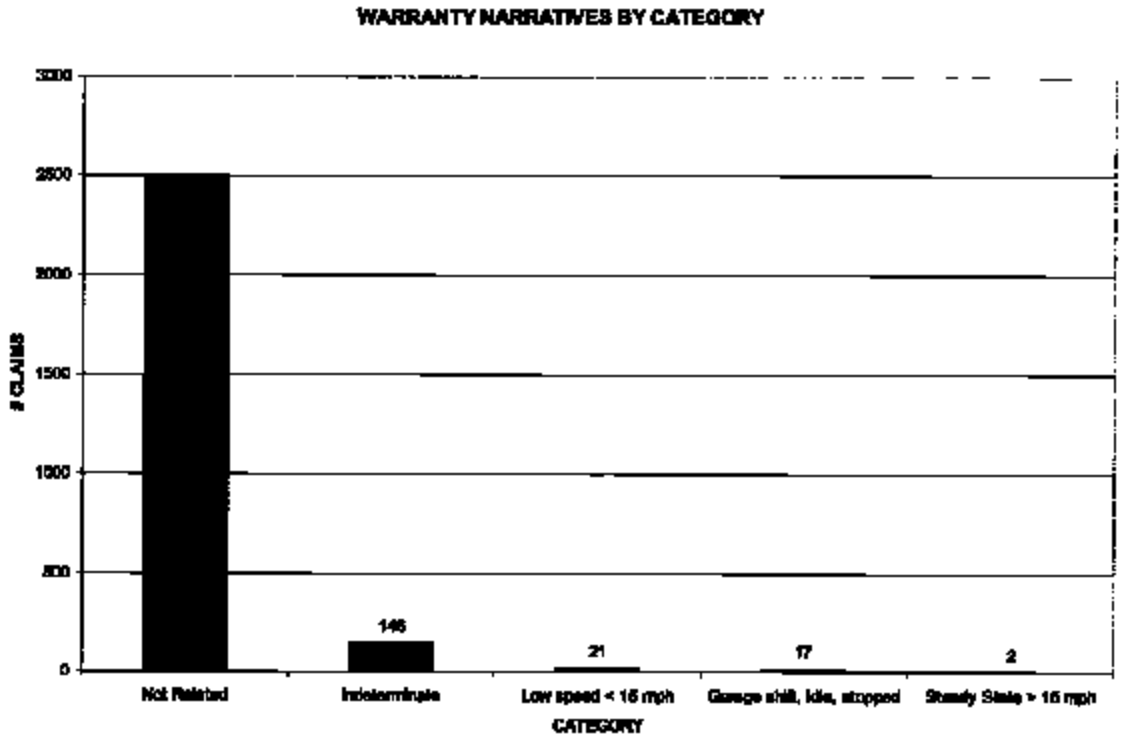
Most warranty claims do not have associated narrative data. A number of the warranty claims included with the EA response did have narrative data available. An analysis of those narratives showed that the vast majority or 93% were clearly not related to the alleged condition. Based on the available narrative data, only a small number were found that may relate to the alleged condition, and are shown on the chart below.



Note: There were over 2600 warranty narratives. DCC used a word search to filter out narratives that were not related to the alleged condition. In an attempt to catch all narratives that may be related, several variations of words were used. The word search criteria used is as follows:

- die, dies, died, dying
- shut off, shuts off, shutting off
- shut down, shuts down, shutting down
- quit, quits, quitting
- cut out, cuts out, cutting out
- pcm
- ngc
- module
- flash
- program
- TSB

Any narratives that did not contain any one of these words were binned into the "not related" category. The remaining narratives, approximately 300, were read manually and binned accordingly.

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Problem Code	Description
14	Short or open
15	Calibration
48	Grounded or shorted
58	Internal defect
83	Connection loose
DM	Damaged module
DO	Die outs
DR	Controller internal faults
FM	Flash module
NP	Sags, hesitates and no power
PI	Poor idle
UC	Uncodeable
Y2	Stalls
Y4	Stumbles
YF	Improper idle
YH	Lack power

The standard warranty offered on the 2004 MY through 2005 MY Dodge Durango sport utility vehicles and Ram pickup trucks with 5.7L V8 engines that have been manufactured for sale or lease in the United States is 3 years/36,000 miles for basic coverage and 7 years/70,000 miles for the powertrain. The subject component (Powertrain Control Module - PCM) is covered under the 8 year/80,000 mile emission system warranty. There were 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.

7. **Produce copies of all service, warranty, and other documents that relate to, or may relate to, the alleged defect in the subject vehicles, that DaimlerChrysler has issued to any dealers, regional or zone offices, field offices, fleet purchasers, or other entities. This includes, but is not limited to, service bulletins 18-013-05 and 18-013-05A, advisories, informational documents, training documents, or other documents or communications, with the exception of standard shop manuals. Also include the latest draft copy of any communication that DaimlerChrysler is planning to issue within the next 120 days.**

Summarize and provide a brief chronology of all actions taken by DaimlerChrysler leading to each of the technical service bulletins that have been issued relating to the

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alleged defect in the subject components. Provide copies of all documents, organized in chronological order, related to the development of these bulletins.

A7. The following documents are being provided in Enclosure 5 (summarized briefly below). These same bulletins were submitted in PE05-027 response. These bulletins are still applicable, and there have been no other service actions since to address the alleged condition.

Technical Service Bulletin (TSB) # 18-013-05 Rev A. - This bulletin outlines a change in the engine calibration for 2004 and 2005 model year Dodge Durango sport utility vehicle and Dodge Ram pickup trucks equipped with the 5.7L V8 engine. It involves reprogramming of the Powertrain Control Module (PCM) in the case when a vehicle operator is experiencing rough idle, idle fluctuation, or a MIL illumination.

A small number of reports of alleged stalling during stopping, parking lot and garage shift maneuvers were first received in November, 2004. A team was established to further investigate. DCC determined that the calibration for spark run-to-start rpm threshold was set equal to the fuel run-to-start rpm threshold. A new calibration was released for production and implemented on the Durango on February 1, 2005, and the Ram on March 17, 2005. Service actions were developed and released on March 16, 2005 for the 2004 model year vehicles, and on April 19, 2005 to include the 2005 model year vehicles.

Technical Service Bulletin (TSB) # 18-002-05 - This bulletin outlines a change in the engine calibration and the application of adhesive to the roof supports for 2005 model year Dodge Durango vehicles equipped with the 5.7L engine. It involves the reprogramming of the Powertrain Control Module and the application of adhesive to the roof supports when a vehicle operator is experiencing a rough idle or a booming sound at idle or in drive with the air conditioning on.

The issues leading to the creation of the TSB were identified during the preproduction build of the 2005 model year Dodge Durango at the Newark (Delaware) Assembly Plant in August, 2004. Some vehicles did not achieve the specified low idle speed. It was determined that an idle MAP (Manifold Absolute Pressure) adaptive issue could keep the idle speed at 570 rpm which could result in a booming sound at idle. The permanent corrective action was to increase the idle speed to 640 rpm. This change was implemented into production on September 22, 2004 and the TSB issued in January, 2005.

8. Describe all assessments, analyses, tests, test results, studies, surveys, simulations, investigations, inquiries, remedial measures 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:

a. Action title or identifier;

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b. The actual or planned start date;
c. The actual or expected end date;
d. 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.

For each action identified, provide copies of all documents related to the action, regardless of whether the documents are in interim, draft, or final form. Organize the documents chronologically by action.

A8. The following documents describe completed actions that may relate to the alleged defect were provided in, on July 28, 2005.

Previously submitted with response to PE05-027 question 8, Enclosure 11:
5.7L Idle Undershoot While Turning. Customer Problem Resolution Team (CPRT) internal presentation by DCC Engineering describing calibration change to correct potential engine rpm undershoot during turning maneuver.

Ignition Switch PQM. CPRT internal presentation by DCC Engineering describing ignition switch corrective actions to address intermittent problems with accessory operation and no-start condition.

Open Issue List 2004-12-02. DCC Engineering tracking document describing actions relating to alleged vehicle stalling during stopping and parking lot maneuvers.

Perfection June 2003 PowerPoint. DCC Engineering presentation document describing updates to the 5.7L V8 powertrain including identification of key issues.

Submitted with EA05-018 (Enclosure 6):
DCC Survey. In July 2005, a survey pertaining to stalling was sent to DCC employees in possession of a subject vehicle. The purpose of the survey was to obtain employee feedback relative to the alleged condition. In September 2005, a follow up survey was sent to gather additional information.

Buyback Vehicles. A total of 4 vehicles that have been bought back specifically due to the alleged condition have been undergoing engineering analysis. To date, all analysis on these vehicles have been inconclusive.

VOQ Analysis. The five vehicles identified by Chris Lash, NHTSA investigator, that had been updated with the latest calibration, but still alleged having the stalling condition. DCC engineering contacted the dealers of the five vehicles identified by NHTSA and the document is attached.

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9. Describe all modifications or changes made by, or on behalf of, DaimlerChrysler in the design and/or programming of the subject component, from the start of production to date, which relate to, or may relate to, the alleged defect in the subject 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.

Also, provide the above information for any modification or change that DaimlerChrysler is aware of which may be incorporated into vehicle production within the next 120 days.

A9. DCC has one PCM which controls both the engine and transmission function. The PCM is controlled by DCC's engine/transmission control software which is then executed based on engine or transmission requirements. There are no other software programs, modules, or controllers that control engine function.

A PDF file (Enclosure 7 - Change History) is provided to document the changes that have taken place during the subject model years on the subject component.

10. State the number of subject components DaimlerChrysler has sold or installed under warranty that may be 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/year of sale.

For each component part number, provide the supplier's name, address, and appropriate point of contact (name, title, and telephone number). Also identify by make, model and model year, any other vehicles of which DaimlerChrysler is aware that contain the identical component, whether installed in production or in service, and state the applicable dates of production or service usage.

A10. The requested part demand information has been included in Enclosure 8 – Part Info. It is impossible to determine the reason for each of these part sales. There are other issues that are not related to the alleged condition, yet may trigger sales/replacement of the

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subject component. In addition it is not possible to conclude that part demand is a reliable indicator of any trend related to the alleged condition.

11. Beginning 30 days from receipt of this letter, provide monthly reports to ODI listing all warranty claims received by DaimlerChrysler that are related to the alleged defect in the subject vehicles. For each claim listed, provide the warranty claim details requested in Item 5 of this letter and provide the owner name, address, and telephone number(s) and dealer name, telephone number and name of dealer contact knowledgeable about the vehicle repair.

A11. Per conversation with NHTSA Investigator, Chris Lash, during the week of January 9, 2006, it was agreed that DCC will provide monthly reports to ODI, beginning 30 days after the submission of this response. DCC will provide the first update on Monday April 3, 2006.

12. Furnish DaimlerChrysler's assessment of the alleged defect in each design version of the subject components that have been used in the subject vehicles, including:

- **a. The causal or contributory factor(s), including a detailed assessment of the factors affecting the occurrence of engine stall;**
- **b. The failure mechanism(s) – for software related failures, state the specific conditions necessary to produce a stall event;**
- **c. The ability to restart the engine following a stall event – state as percentages involving (1) immediate, (2) delayed, and (3) no restart;**
- **d. Stalling incident rates at 12- and 24-months in service based on the experience in the subject vehicle populations that have reached those service intervals;**
- **e. The stalling incident rates estimated by DCC at 36- and 60-months in service based on statistical modeling;**
- **f. The risk to motor vehicle safety that it poses;**
- **g. 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; and**
- **h. The reports included with this inquiry.**

A12. DCC has not identified a single causal factor that may be responsible for the reported stalling events occurring in the 2004 and 2005 MY Dodge Durango and Dodge Ram pickup trucks equipped with 5.7L engines. All, or nearly all, of these vehicles were evaluated by our trained dealership technicians, and the alleged condition was not repeatable nor did it leave any fault codes identifying a problem with the subject component. All of the vehicles in the population are covered by DCC's 8 year / 80,000 emission system warranty, which will correct free of charge any identified issue with the powertrain control module (PCM).

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DCC has not identified a single failure mechanism responsible for the alleged stalling events. Based on calibration development experience, most stalling conditions can be explained by idle undershoot during transient load and/or environmental conditions. The field input suggests that stalling due to calibration related issues does not typically occur during steady state operation with a warm engine. In addition, problems with any of the hardware providing input to the engine control software would generate a fault code and/or illuminate the MIL, which is not the case.

Also, because the software embedded within the PCM completely controls the internal combustion process in the engine under all possible conditions, the specific states of air/fuel mixture and engine load that may induce a stalling condition cannot be determined. Indeed, there are potentially an infinite number of combinations. DCC relies on rigorous bench testing and vehicle development programs to prove out engine calibration algorithms. Any remaining conditions that could produce an inadequate air/fuel mixture for the given load conditions on the subject vehicles have not been identified at this time.

With respect to the alleged complaints of stalling while driving in which no causal condition has been identified, 91% have reported immediate restart, another 2% reported a delay in restarting and the remaining 7% reported an inability to restart the vehicle. None of the reported stalling events – whether at low, idle or steady state speeds – has resulted in injury, death or property damage. Moreover, the three crashes now being reported cannot be confirmed to have resulted from a stalling event.

With respect to the complaints of stalling while driving in which no causal condition has been identified, the stalling incident rate at12 months in service is 81c/100k, and 73c/100k at 24 months in service.

With respect to the stalling while driving in which no causal condition has been identified, the projected stalling incident rate at 36 months in service is 97c/100k, 111c/100k at 60 months in service. This is a statistical model which may not reveal actual results.

Complaints of stalling while driving in the subject vehicle population are small in magnitude. The facts and data illustrate a significantly lower frequency of stalling reports and little or no safety risk in the subject population compared with previous NHTSA stalling investigations that have been closed.

Although some reports allege that there is no warning as to when the alleged condition may occur, again, DCC maintains that in the case of a stall, the operator would have the ability to steer and that the brakes would operate normally for at least one application of the brake pedal before additional force would be needed to operate brakes without assist.

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Regarding the reports included with this inquiry, DCC has made the following general observations:

- A vast majority of the vehicles that reportedly stalled would immediately restart.
- The stalling condition could generally not be repeated.
- There were no fault or diagnostic codes recorded by the Powertrain Control Module (PCM) that would reveal a possible cause of the stalling event.
- Many of the stalling events occurred either at very low or idle speeds.

The fact and data contained in this response illustrates a significantly lower frequency of stalling reports and little or no safety risk in the subject population compared to other NHTSA stalling investigations. The corrective measures that have been taken to date have significantly reduced the number of occurrences of alleged stalling events in those vehicles where no causal condition could be identified. Not a single stalling event involving death, injury or property damage has been reported to DCC or the agency. Accordingly, DCC believes there is no unreasonable risk to motor vehicle safety and this investigation should be closed.