DAIMLERCHRYSLER

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

February 22, 2006

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

Reference: NVS-212jfa; EA05-020

Dear Ms. DeMeter,

This document contains DaimlerChrysler Corporation's (DCC) response to the referenced Inquiry dated December 21, 2005 regarding information concerning the electric motor driven engine cooling fan in 2002MY Jeep Grand Cherokee vehicles equipped with 4.0L engines. 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.

In the expanded search from the Preliminary Evaluation as can be seen in the attached response, DCC's review of complaints, field reports, warranty claims, legal proceedings, and lawsuits has still not identified any safety related issue with the electric motor driven cooling fan integrity or performance characteristics. The relatively small number of non-injury claims concerning the alleged defect continues to appear concentrated in 2002MY Jeep Grand Cherokee vehicles built within a very narrow time frame of the subject population, during which no design changes were made.

As previously noted, the subject assembly is made of light weight plastic, significantly limiting the energy carrying capacity of any separated pieces. The vast majority of engine operation occurs with the hood closed. The likelihood of an event involving the alleged defect is much greater while driving than the potential of occurrence during servicing the vehicle.

There continue to be no reports of property damage or injury related to the alleged defect despite the expanded scope of this investigation including a wider timeframe and over 477,500 vehicles over three additional model years, supporting DCC's argument that the cooling fan operates within a well protected environment and does not present an unreasonable risk to motor vehicle safety.

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

DAIMLERCHRYSLER

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

Sincerely,

Stephan J. Speth

Attachment and Enclosures

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

Q1. 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 vehicles, excluding those provided in response to PE05-039:

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;
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 "f" 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 "f," provide a summary description of the alleged problem and causal and contributing factors and DCC's assessment of the problem, with a summary of the significant underlying facts and evidence. For items "e" and "f," 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.

NOTE: UNLESS OTHERWISE INDICATED IN THE QUESTION RESPONSE, THIS DOCUMENT APPENDS THE PE05-039 RESPONSE SUBMITTED SEPTEMBER 8, 2005. THE UPDATED INFORMATION CONTAINED WITHIN IS THROUGH DECEMBER 21, 2005, AND DOES NOT CONTAIN INFORMATION PREVIOUSLY SUBMITTED WITH PE05-039.

A1. The following summarizes the non-privileged reports received by DCC that relate to, or may relate to, the alleged condition in the subject vehicles up to December 21, 2005 when this information request was received, excluding those already provided in response to PE05-039. DCC has conducted a reasonable and diligent search of our normal repositories of such information.

	TOTAL	UNIQUE
CAIRs		
Partial separation of fan blade / possible damage to surrounding components	30	
Possible partial separation of fan blade / damage to surrounding components	38	
Other potential condition / no damage to surrounding components	4	
Total	72	68
Field Reports	0	0
Legal Claims	0	0

a. There are a total of 72 customer complaints containing 68 unique vehicles that may relate to the alleged condition.

b. There are no field reports that relate to the alleged condition.

c. There are no reported injuries or fatalities that are responsive to this inquiry.

d. There is no reported property damage responsive to this inquiry.

e. There are no third-party arbitration proceedings involving DCC that are responsive to this inquiry.

f. There are no legal claims against DCC, or notice received by DCC, that is responsive to this inquiry. There are no lawsuits, pending or closed, involving DCC that are responsive to this inquiry.

Q2. Separately, for each item (complaint, report, claim, notice, or matter) within the scope of your response to Request No. 1, state the following information:

a. DCC 's file number or other identifier used;
b. The category of the item, as identified in Request No. 1 (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.

Provide this information in Microsoft Access 2000, or a compatible format, entitled "REQUEST NUMBER TWO DATA.

A2. The detailed response that lists the customer complaints and field reports, from Request No. 1, as requested in items a. through l. is provided in Enclosure 1 as a Microsoft Access 2000 table, entitled "REQUEST NUMBER TWO DATA".

Q3. Produce copies of all documents related to each item within the scope of Request No. 1. Organize the documents separately by category (i.e., consumer complaints, field reports, etc.) and describe the method DCC used for organizing the documents.

A3. Copies of all documents within the scope of Request No. 1 are provided in Enclosure 2 – COMPLAINT DETAILS, folder "Customer Complaints".

Q4. 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, excluding those provided in response to PE05-039: 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. **DCC'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. **Concern stated by customer; and**
k. **Comment(s), if any, by the dealer/technician relating to the claim and/or repair.**

Provide this information in Microsoft Access 2000, or a compatible format, entitled "WARRANTY DATA.

A4. Excluding those provided in the September 8, 2005 PE05-039 response, there have been 739 warranty claims that may relate to the alleged defect, of which 35 have corresponding narratives.

It is often not possible to determine whether each particular warranty claim is in any way related to the alleged condition. 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 data 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 k. is provided in Enclosure 3 as a Microsoft Access table, titled "WARRANTY DATA".

Q5. Describe in detail the search criteria used by DCC 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.

A5. The search criteria used by DCC to identify claims to Request No. 5 can be found in the chart below:

[redacted]	[redacted]
MODULE/FAN, ASSEMBLY - Replace	07-15-01-01
FAN/COOLING, ELECTRIC MODULE – Replace	07-15-02-01
FAN – Replace – All Engines	07-20-01-09
FAN – Replace - Hydraulic	07-20-01-10

[redacted]	[redacted]
11	Broken or Cracked
UC	Uncodeable
9R	Engine runs hot

Q6. In its September 9, 2005 response to ODI's July 19, 2005 Preliminary Evaluation (PE) information request letter (hereafter, DCC's PE response), DCC stated that it is "continuing to investigate the supplier process history." State whether DCC has completed its supplier investigation or if it is still in process. If the investigation has not been completed, provide the anticipated completion date. Separately, produce, in chronological order, copies of all documents to date that relate to this effort.

A6. DCC has been working in cooperation with its supply base to understand the process history in the manufacturing of the subject component. Although this investigation is ongoing and roughly expected to be complete April of 2006, a summary of findings to date is provided along with all documents within DCC's possession relating to this effort. Documents responsive to this question are provided in Enclosure 4 – SUPPLIER PROCESS HISTORY.

Additional documents responsive to this question are being submitted in Enclosure 9 – CONFIDENTIAL – SUPPLIER PROCESS HISTORY (CD-Rom) to the Office of the Chief Counsel, with a request for confidential treatment.

Q7. DCC's PE response to Request No. 8 (assessments, tests, etc), states that since the opening of PE 05-039, DCC initiated a field parts return program to evaluate the material properties of cooling fans from subject vehicles that have demonstrated the alleged defect. State whether DCC has completed its field parts evaluation or if it is still in process. If the program is still in process, provide the anticipated completion date. Separately, for each vehicle evaluated to date, state the following information:

a. The complete VIN number of the vehicle;
b. Vehicle production date;
c. Date of retail sale;
d. Mileage at the time of the failure;
e. The location, by state, in which the vehicle was repaired;
f. The entity that conducted the fan evaluation;
g. The date of production and mold cavity of the fan; and
h. A summary of the evaluation results.

A7. While investigating the subject components in regard to the Preliminary Evaluation, DCC instituted a retention program under which parts covered under warranty for claims concerning the alleged defect were returned to DCC for analysis. From this retention program, five parts were used for analysis of material properties. The vehicle information is noted in the table below. In some cases, the mold date of the fan could not be determined from the condition of the parts returned. However, supplier records indicate that the tool with the identifier number 8481-1, was used for all of these parts.

This retention program is ongoing and has been expanded to include all other model years for which the Grand Cherokee used the subject component. There have been no other returns suitable for evaluation of the alleged defect other than what is noted in the table below.

VIN	Warranty Build Date	Sold Date	Mileage	State	Evaluation Entity
1J4GX48S12[redacted]	2/22/2002	3/21/2002	56995	NC	DCC Materials/Bosch
1J4GX48S22[redacted]	4/15/2002	4/30/2002	37327	GA	DCC Materials
1J4GW48S22[redacted]	3/2/2002	4/5/2002	52448	FL	Bosch
1J4GW48S42[redacted]	4/6/2002	5/13/2002	27092	FL	DCC Materials
1J8GX58512[redacted]	03/26/2002	07/30/2002	30574	CA	DCC Materials

The analysis of materials of the subject components was also extended to parts acquired through other methods, in particular, parts acquired through a survey of subject vehicles built within the months of February, March, and April of 2002 as well as a part acquisition program from all other model years for which the Grand Cherokee used the subject component, concentrating on the southern field zones of Florida, Arizona, and California.

Documents responsive to this question are being submitted in Enclosure 9 – CONFIDENTIAL – MATERIAL PROPERTY RESULTS (CD-Rom) to the Office of the Chief Counsel, with a request for confidential treatment.

Q8. In the cover letter to DCC's PE response, DCC identified the scope of the alleged defect to be limited to the 2002 Jeep Grand Cherokee vehicles produced in the months of February, March, and April of 2002. Further, DCC stated that it "intended" a survey of subject vehicles built within those months. State whether DCC has completed this survey or if it is still in process. If the survey is still in process, provide the anticipated completion date. Separately, for each vehicle included in the survey to date, state the following information:

a. The complete VIN number of the vehicle;
b. Vehicle production date;
c. Date of retail sale;
d. Mileage at the time of the survey;
e. The location, by state, of the survey vehicle;
f. The entity that conducted the survey;
g. The date of production and mold cavity of the fan; and
h. A summary of the survey results.

A8. To further investigate the alleged defect, DCC conducted a survey of the subject vehicles built within the months of February, March, and April of 2002. The intent of this survey was to evaluate and compare the performance of the electric motor driven cooling fans with parts built outside of the above mentioned time frame as well as control parts which had never been installed in vehicle. The survey population was sampled from active DCC employees volunteering to have the cooling fan module replaced from their personally owned or leased vehicle. None of the vehicles sampled noted any previous performance issues with the vehicle's cooling system. The parts were evaluated for dimensional and material parameters and endurance performance. The vehicle information is noted in the table below.

VIN	Warranty Build Date	Sold Date	Mileage	Shroud Mold Date	Fan Mold Date	Fan Tool Number
1J4GW58S22C[redacted]	7/18/2001	8/30/2001	35832	6/22/2001	6/19/2001	8481-2
1J4GW48S52C[redacted]	3/4/2002	5/17/2002	89326	2/26/2002	2/14/2002	8481-1
1J4GW48S92C[redacted]	3/12/2002	3/28/2002	32543	2/27/2002	2/22/2002	8481-1
1J4GW48S22C[redacted]	2/23/2002	4/1/2002	47842	2/15/2002	2/15/2002	8481-1
1J4GW48S02C[redacted]	5/1/2002	8/22/2002	56121	4/22/2002	4/19/2002	8481-1
1J4GW48S12C[redacted]	5/10/2002	7/10/2002	85772	4/27/2002	3/27/2002	8481-1

All of the participants resided in Michigan. All part replacements were conducted at DCC's Sterling Heights Vehicle Test Center located in Sterling Heights, MI. Testing was conducted by the Robert Bosch Corporation at their test facility in Albion, Indiana.

Documents responsive to this question are being submitted in Enclosure 9 – CONFIDENTIAL – SURVEY RESULTS (CD-Rom) to the Office of the Chief Counsel, with a request for confidential treatment.

Q9. DCC's PE response to Request Nos. 9 and 11 (modifications and part sales) appears to indicate usage of the 52079528 AB fan in Grand Cherokee ("WJ") vehicles in model years other than 2002. Identify all other model year WJ vehicles that utilize the 52079528 AB fan. For those vehicles identified, provide production data, and, the information requested by Requests Nos. 1 through 5 above. Please label the associated files to these responses as "other vehicles," e.g., PRODUCTION DATA: OTHER VEHICLES, etc.

A9. In addition to being used on the 2002 MY Jeep Grand Cherokee with the 4.0L engine, the 52079528AB cooling fan was used for other certain applications of the 2000, 2001, and 2003MY Jeep Grand Cherokees. The 52079528AB fan was introduced in the 2000MY Jeep Grand Cherokee as a mid-model year change for both the 4.0L and 4.7L engine applications. Starting with the 2001MY, the Jeep

Grand Cherokee utilized 52079528AB only in vehicles built with the 4.0L engine up until the 2003MY where another mid-model year change superceded this part.

In summary, the 52079528AB fan was utilized in 4.0L Jeep Grand Cherokee vehicles built from September 24, 1999 through December 19, 2002 for which Daimler Chrysler Corporation manufactured 394,229 vehicles. It was also used on 2000MY 4.7L Jeep Grand Cherokee vehicles starting with a build date of September 24, 1999 for which 83,313 vehicles were manufactured.

The detailed response that lists the production data is provided in Enclosure 5 as a Microsoft Access 2000 table, entitled "PRODUCTION DATA:OTHER VEHICLES".

The following summarizes the non-privileged reports received by DCC that relate to, or may relate to, the alleged condition in Grand Cherokee vehicles in model years other than 2002 that utilized the 52079528AB fan. DCC has conducted a reasonable and diligent search of our normal repositories of such information for applicable complaints opened from September 24, 1999 through December 21, 2005.

	TOTAL	UNIQUE
CAIRs		
Partial separation of fan blade / possible damage to surrounding components	14	
Possible partial separation of fan blade / damage to surrounding components	13	
Other potential condition / no damage to surrounding components	11	
Total	38	37
Field Reports	1	1
Legal Claims	0	0

a. There are a total of 38 customer complaints containing 37 unique vehicles that may relate to the alleged condition.

b. There is 1 field report that relates to the alleged condition all from the same vehicle.

c. There are no reported injuries or fatalities that are responsive to this inquiry.

d. There is no reported property damage responsive to this inquiry.

e. There are no third-party arbitration proceedings involving DCC that are responsive to this inquiry.

f. There are no legal claims against DCC, or notice received by DCC, that is responsive to this inquiry. There are no lawsuits, pending or closed, involving DCC that are responsive to this inquiry.

The detailed response that lists the customer complaints and field reports far all other model year WJ vehicles that utilize the 52079528 AB fan, as requested in items a. through l. of Question 2 is provided in Enclosure 5 as a Microsoft Access 2000 table, entitled "REQUEST NUMBER TWO DATA:OTHER VEHICLES".

Copies of all documents within the scope of Request No. 9 are provided in Enclosure 5, folder "CUSTOMER COMPLAINTS: OTHER VEHICLES".

There have been 2497 warranty claims that may relate to the alleged defect, of which 123 have corresponding narratives.

It is often not possible to determine whether each particular warranty claim is in any way related to the alleged condition. 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 data 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 k. of Question 4 is provided in Enclosure 5 as a Microsoft Access table, entitled "WARRANTY DATA: OTHER VEHICLES".

The search criteria used by DCC to identify claims to Request No.9 is the same as Request No. 5.

Q10. DCC's PE response to Request No. 11 (part sales) references a table in Enclosure 7 that provides the following three engine cooling fan part numbers: 52079528, 52079528 AB, and 52079528 AD. Identify and describe in detail each difference between these three engine cooling fans. Separately, identify the vehicle applications and vehicle production volumes for each.

A10. The detailed response that identifies the differences between the three distinct levels of electric motor driven cooling fans used on the Jeep Grand Cherokee and describes the vehicle applications and volumes for each, can be found in Enclosure 6 – VEHICLE APPLICATIONS.

Q11. Provide engineering drawings for each fan identified in Request No. 10.

A11. Bosch part drawings are being submitted to the Office of Chief Counsel, and a Bosch request for confidential treatment will be forthcoming.

Q12. State DCC's assessment as to why the sales volumes for the 52079528 AB fan account for 95% of the total sales for the three fans identified above?

A12. The 52079528AB electric motor driven cooing fan accounts for most aftermarket or service part sales for certain applications of the 2000 – 2003MY Jeep Grand Cherokees for several reasons not related to the alleged condition. First the 52079528AB level part was used in production for more vehicles that the other two fans mentioned. Second, the 52079528AB level fan is used as a replacement for the 52079528 fan that it superceded because it was designed to be interchangeable. Therefore, one would expect the part sales for the 52079528AB fan to increase proportionally while the 52079528 fan part sales drop to zero as this part became unavailable. The 52079528AD fan was, however, not interchangeable with the other fans due to a unique electrical connector, and, hence, its usage as a replacement part is limited to mid-2003MY Jeep Grand Cherokees with the 4.0L engine and later.

In nearly all cases, it is impossible to determine what these part sales are for. There are other customer issues (i.e., customer damage, collision) that are not related to this alleged condition, yet still trigger sales/replacement of the subject components. DCC has concluded that the part sales cannot be used to determine any trend related to the alleged condition.

Q13. Describe in detail, the production processes, material compositions, including properties and specifications, molds, mold cavities, etc., used in the manufacture of the fan blade of the subject component identified by part number 52079528 AB.

accident or property damage in any of the identified complaints. For this and reasons previously stated in response to PE05-039, DCC continues to maintain the belief that the alleged condition does not present an unreasonable risk to motor vehicle safety.