

DAIMLERCHRYSLER

Thuff
10/23/05

RECEIVED
NVS-212

2005 OCT 14 P 3:22

OFFICE OF VEHICLE
SAFETY

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

October 12, 2005

Mr. Thomas Z. Cooper, Chief
Vehicle Integrity Division
Office of Defects Investigation
National Highway Traffic Safety Administration
U.S. Department of Transportation
400 Seventh Street, SW
Washington, D.C. 20590

Dear Mr. Cooper:

Reference: NVS-212jfa; PE05-046

This document contains DaimlerChrysler Corporation's ("DCC") response to the referenced inquiry regarding alleged seat belt buckle latching difficulty on some 2002 model year Jeep Liberty ("KJ") 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.

Since the opening of PE05-046 approximately 6 weeks ago, DCC has completed a thorough investigation and analysis into the potential causes for complaints regarding 2002 KJ front driver and passenger seat belt buckles and latch plate tongues, that may either prevent or inhibit the buckles ability to latch or unlatch, or cause the buckle to false latch (DCC is unsure of the definition of the term "false latch". For purposes of this response, DCC defines false latch as any condition of partial engagement in which the latch plate tongue appears to the operator to be fully engaged. DCC is unaware of and unable to create a "false latch" condition with the subject buckles).

- Thorough analysis of complaint narratives from multiple sources.
- Retrofit and evaluation of components from complaint vehicles.
- Institution of a warranty part retention program.
- Evaluated past warranty return history.
- Performed Materials Testing on field returned buckle components.
- Performed Laboratory Testing on field returned buckle assemblies.


Although these efforts have been extensive, DCC has not found or been able to reproduce samples of the condition alleged by NHTSA in the subject vehicle population. While samples of the field returned buckles examined contained separated latch guide leaf springs, some of which caused the buckle button to intermittently remain partially depressed, the button returned to the normal design position and the latch plate tongue became fully latched once inserted into the buckle. All of the returned samples completely latched and unlatched the tongue. No instances of tongue partial engagement were exhibited in any of the returned samples reviewed.

Functional testing of 2 returned buckle assemblies was performed by TRW Automotive ("TRWA"), the front seat belt assembly supplier. The latching, unlatching, and ultimate tensile strength testing completed on these parts is per DCC Performance Specification PF-8099, which exceeds FMVSS 209 requirements for comparable tests.

Of the 58 unique VINs identified from all data sources that have been deemed by DCC to possibly be related to the alleged condition, none have resulted in accidents, injury or property damage. These 58 inputs represent only 0.014% of the total 2002 model year Jeep Liberty front seat buckle installations. This does not represent a trend, safety or otherwise.

It is the assessment of DCC that while some customers have registered complaints involving latching and unlatching of their front seat belt buckles, the causes associated with the complaints are quite varied. However, the samples of returned / acquired buckles that DCC has reviewed subsequent to the opening of PE05-046 have shown that the function and performance of the buckles, from a safety perspective, has not been compromised. Testing and analysis has clearly shown that the buckles latch, unlatch and retain their structural integrity. DCC believes the complaints received to date are of a customer satisfaction variety, are not safety related, and that PE05-046 should be closed.

Sincerely,



Stephan J. Speth

Attachment and Enclosures

Q1. State the number of all subject vehicles DaimlerChrysler has manufactured for sale or lease in the United States. Separately, for each vehicle manufactured to date by DaimlerChrysler, state the following:

- a. Vehicle identification number (VIN);
- b. Date of manufacture;
- c. Date warranty coverage commenced; and
- d. 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 a compatible format, entitled "PRODUCTION DATA."

A1. The MY 2002 DaimlerChrysler Corporation ("DCC") Jeep Liberty is referred to as the KJ model. The total number of subject 2002 model year KJ vehicles manufactured for the US market is 208,710.

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

Q2. State the number of each of the following, received by DaimlerChrysler, or of which DaimlerChrysler are 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. Property damage claims; and,
- e. Third-party arbitration proceedings where DaimlerChrysler is or was a party to the arbitration; and
- f. Lawsuits, both pending and closed, in which DaimlerChrysler 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).

In addition, for items "c" 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. 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.

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 80 complaints (VOQ + CAIR), which include 8 NHTSA reports (VOQs) and 72 complaints in the DCC system (CAIRs) that may relate to the alleged condition. Due to some complainants providing more than 1 input, there are only 70 unique VINs associated with the 80 complaints.

The list of 8 VOQs received from NHTSA included 3 with related customer complaints in the DCC system. The remaining 5 VOQs are unique reports which do not have related complaints in the DCC system.

- b. There are 12 field reports that contain 12 unique VINs.

See Table below for breakdown of VIN by report type. Each box within double borders represents the number of unique VINs that had that type of report associated with it. For example, the cell in the table that lies in the VOQ column and the CAIR row indicates that 3 VINs had a VOQ report and a CAIR report for the alleged condition. Two other examples: the cell that has the VOQ column and the VOQ row indicates that 5 VINs had a VOQ complaint only; and the CAIR column / CAIR row indicates that 82 VINs had only a CAIR complaint (one or more).

Totaling a single row across the columns yields the total number of that type of report. There are 8 VOQ reports, 72 CAIR reports, 12 Field Reports and 0 legal claims. The total number of reports is $8 + 72 + 12 + 0 = 92$. The number of unique VINs is established by summing the total

cells within the double border cells. The total of unique VINs from all data sources including legal claims/lawsuits is 82.

TABLE: Number of Unique VINs / Number of Total Reports

	VOQ	CAIR	Field Report	Legal Claim	Additional CAIRs	Totals
VOQ	5	3	0	0	—	8
CAIR	3	62	0	0	7	72
Field Report	0	0	12	0	—	12
Legal claim	0	0	0	0	—	0
Total number of reports = sum of far right column = 92						
Unique VINs = sum of cells in double border area = 82						

- c. There are 0 claims alleging crash, injury, or fatality that are responsive to this inquiry.
- d. There are 0 reports that allege property damage that are responsive to this inquiry.
- e. There are 0 third-party arbitration proceedings involving DCC that are responsive to this inquiry.
- f. There are 0 legal claims / lawsuits against DCC, or notices received by DCC, that are responsive to the condition alleged in this investigation ("failure of subject component(s) that either prevent or inhibit the buckle's ability to latch or unlatch, or cause the buckle to false latch").

DCC's analysis of complaints indicates that 2 of the 82 unique VINs (2.4%) had some kind of foreign contamination in the seat belt buckle that is unrelated to the condition alleged in this inquiry. DCC cannot be responsible for unreasonable levels of contamination of the buckle mechanism that may render it difficult to latch or unlatch.

DCC found two other categories of complaints that were too vague or lacked sufficient detail to appropriately attribute the complaint to the specific condition alleged in this inquiry. For example, 17.1% of the unique VINs (14 out of 82) reference seat belt inoperable or not working. Complaints such as "my seat belt broke" or "doesn't work" cannot accurately be categorized because they are not specific enough. Furthermore, analysis of available warranty data on these VINs did not reveal any further information.

Another 9.8% of the unique VINs (8 out of 82) indicate some concern with the seat belt, but do not specify whether inoperable, broken, or any specific issue. Therefore, these conditions also cannot accurately be attributed to the condition alleged in this inquiry.

The remaining unique VINs (58 out of 82) or 70.7% reference a difficulty for the seat belt to latch (20 VINs or 24.4%), unlatch (10 VINs or 12.2%) or button / buckle sticks (28 VINs or 34.1%). It is DCC's opinion that these 58 inputs are the only ones that may possibly be related to the alleged condition.

However, it is also important to make two points regarding the 58 complaint VINs. First, there is no way of discerning whether any may have had some kind of foreign contamination in the buckle mechanism. Generally speaking, it has been DCC's experience in the past from field returned buckles that the most common reason for a buckle to not function is some kind of foreign contamination (such as soft drink spill). The buckle supplier, TRW Automotive, (TRWA) has also echoed this sentiment and this fact is reflected in an analysis contained in Enclosure 7 - Warranty Part Analysis.

The second point to note is that any complaint regarding inability to latch, unlatch or button sticking is a customer perception. DCC has reviewed 7 returned samples (2 VOQ samples, 4 warranty returns, and 1 employee / retiree return) and all of the buckles were able to be latched and unlatched without difficulty. All of the samples had separated latch guide leaf spring(s) which may affect the button's ability to completely return to normal design position. However, the buckle mechanism also utilizes a latch plate ejection spring which acts to return the button to normal design position independent of latch guide leaf spring presence. The latch plate ejector springs were intact on all 7 samples. For all 7 samples, the button returned to the normal design position and the tongue became latched once the latch plate was inserted into the buckle. While the condition evident in these samples may be a minor customer annoyance, it in no way prevents the seat belt from being properly worn and providing its intended safety function.

- Q3. 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 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."

- A3. **The detailed response that lists the customer complaints and field reports, from Request No. 2, as requested in items a. through l. is provided in Enclosure 2 as a Microsoft Access 2000 table, titled "REQUEST NUMBER TWO DATA".**
- Q4. **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 Request 2 are provided in Enclosure 3 – FIELD REPORTS, on the enclosed CD-ROM.**
- Q5. **State 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 a procedure specified in a 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. **Concern stated by customer; and**
- k. **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."

A5.

23-13-02-02	528
23-13-02-03	1221
23-13-01-04	504
23-13-01-05	1799

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, not related to this alleged condition, that trigger replacement of subject components. DCC has concluded that warranty data cannot be used to determine any trend related to the alleged condition.

Furthermore, it is noted that LOPs 23-13-02-02 / 03 or nearly half of the warranty counts above are related to the retractor assembly and not the buckle. The retractor assembly warranty is included because it contains the latch plate tongue. Based on all data and parts reviewed to date, there has been no evidence to suggest that the latch plate tongue is related to the alleged condition.

The detailed response that lists the warranty claims is provided in Enclosure 4 as a Microsoft Access 2000 table, titled "WARRANTY DATA".

- Q6. 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 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) related to the alleged defect 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 for Request No. 5 can be found in the chart below:

Seatbelt, Tip Half Front- Replace (Right)	23-13-02-02
Seatbelt, Tip Half Front- Replace (Left)	23-13-02-03
Seatbelt, Buckle Half - Replace (Front Right)	23-13-01-04
Seatbelt, Buckle Half - Replace (Front Left)	23-13-01-05

11	Broken or Cracked
4R	Push Button Broken
61	Intermittent Operation
UC	Uncodeable

The standard warranty offered on all 2002 model year KJ vehicles was 36 month / 36,000 miles. There was 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.

- Q7. 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, bulletins, 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.
- A7. There have been no service, warranty, or other documents that DCC has communicated to any dealers, regional or zone offices, field offices, fleet purchasers, or other entities related to the alleged condition. There have

been no related communications issued since the PE05-046 submittal and none planned in the next 120 days.

Q8. Describe all assessments, analyses, tests, test results, studies, surveys, simulations, investigations, inquiries 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;**
- 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. Since the opening of PE05-046, DCC has initiated the following steps to evaluate or otherwise analyze the alleged condition with the subject component(s) that either prevent(s) or inhibit(s) the buckle's ability to latch or unlatch, or cause(s) the buckle to false latch (DCC is unsure of the definition of the term "false latch". For purposes of this response, DCC defines false latch as any condition of partial engagement in which the latch plate tongue appears to the operator to be fully engaged. DCC is unaware of and unable to create a "false latch" condition with the subject buckles).

- Initiated a part retention program for the 2002 Jeep Liberty front seat belt buckles returned through warranty.
- Coordinated replacement seat belt buckles for 2 VOQ complainants.
- Conducted a study of Warranty Return History for the subject front seat belt buckles and vehicle line, for the model years of 2002 - 2005.
- Conducted a study in the DCC Materials Engineering laboratory on front seatbelt buckles obtained from:
 - VOQ complainant (Reference No. 10127030)

- o Front seat belt buckle obtained from DCC employee / retiree (Hosken).
- Conducted a study in the TRWA Materials Engineering laboratory on a front seat belt buckle returned through warranty.
- Conducted functional testing in the TRWA Test Lab on a VOQ complainant buckle (Reference No. 10135119) and a warranty returned buckle.

The following describes each of the above steps in more detail and refers to data or enclosures where appropriate.

Warranty Part Return Program – Front Seat Belt Buckles: DCC has initiated a hold on front seat belt buckles repaired under warranty, for the subject model year vehicles. This will provide DCC with a supply of front seat belt buckles for further analysis. DCC is in the process of evaluating the parts that have been returned to date, for functional characteristics that are representative of the condition alleged in PE05-046. All 4 of the samples had separated latch guide leaf spring(s) which may affect the button's ability to completely return to normal design position. However, the buckle mechanism also utilizes a latch plate ejection spring which acts to return the button to normal design position independent of latch guide leaf spring presence. The latch plate ejector springs were intact on all 4 samples. For all 4 samples, the button returned to the normal design position and the tongue became latched once the latch plate was inserted into the buckle. While the condition evident in these samples may be a minor customer annoyance, it in no way prevents the seat belt from being properly worn and providing its intended safety function.

See ENCLOSURE 5 – WARRANTY RETURNED BUCKLES, for .JPG and .MPG files documenting buckle condition as received, along with the latching and unlatching performance of each sample (only JPG images of the Hosken buckle are available). Also, there are 2 .MPG files for 2W209839 buckle, 1 of which shows the buckle button in the partially depressed position prior to tongue insertion. Note that the button returns to the normal design position during latching.

VOQ Returned Buckles: DCC has coordinated replacement of driver and/or passenger seat belt buckles from vehicles owned by 2 of the VOQ complainants (Reference No. 10127030 and 10135119). DCC has evaluated these parts for functional characteristics that are representative of the condition alleged in PE05-046. Both of the samples had separated latch guide leaf spring(s) which may affect the button's ability to completely return to normal design position. However, the buckle mechanism also utilizes a latch plate ejection spring which acts to return the button to normal design position independent of latch guide leaf spring

presence. The latch plate ejector springs were intact on both samples. For both samples, the button returned to the normal design position and the tongue became latched once the latch plate was inserted into the buckle. While the condition evident in these samples may be a minor customer annoyance, it in no way prevents the seat belt from being properly worn and providing its intended safety function. The 1 returned passenger buckle (Reference No. 10127030) had no troubles found and is not included in ENCLOSURE 6.

See ENCLOSURE 6 – VOQ RETURNED BUCKLES, for .JPG and .MPG files documenting buckle condition as received, along with the latching and unlatching performance of each sample.

Warranty Part Return History – Front Seat Belt Buckles: DCC has reviewed data from the PRAS (Parts Return Analysis System) and from TRWA, for 2002-2005 model year front seat belt buckles that have been previously returned through warranty and evaluated for root cause. It should be noted that only 1 of the previously reviewed warranty parts was identified as having a separated latch guide leaf spring.

See ENCLOSURE 7 – WARRANTY PART ANALYSIS, for this information.

Front Seat Belt Buckle Materials Laboratory Testing: DCC submitted 2 front seat belt buckles, 1 removed from the vehicle of a VOQ complainant (Reference No. 10127030) and 1 returned through warranty, to the DCC Materials Engineering test laboratory for evaluation of material properties and magnified photography of the buckle buttons.

Testing of these buckle components is incomplete at this time. Upon completion, DCC will evaluate the results of this testing and will provide conclusions, if any, to NHTSA.

Front Seat Belt Buckle Materials Laboratory Testing: DCC submitted 1 front seat belt buckle, obtained from DCC employee / retiree's vehicle, to the TRWA Materials Engineering test laboratory for evaluation of material properties and magnified photography of the buckle buttons.

See Enclosure 8 – TRWA BUCKLE BUTTON MATERIAL STUDIES, for this report.

Front Seat Belt Buckle Functional Laboratory Testing: DCC submitted 2 returned front seat belt buckles to the TRWA Testing Lab for:

- 100 latching / unlatching cycles
- Tongue Insertion force measurement

- Button release force measurement
- Ultimate tensile force of buckle / tongue assembly

The Intent of the tests was to determine if the separated latch guide leaf springs had a negative effect on buckle latching / unlatching performance or integrity of latching. Both buckle assemblies successfully completed the requested latching & unlatching cycling, tongue insertion & release force, and ultimate tensile strength for the buckle / tongue assemblies.

See Enclosure 9 – BUCKLE FUNCTIONAL TESTS, for this report.

Q9. Describe all modifications or changes made by, or on behalf of, DaimlerChrysler in the design, material composition, manufacture, quality control, supply, or installation of the subject components, 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. The driver and passenger front inboard buckle assemblies were a common part number at the start of production for the 2002 model year. Changes made in subsequent years were interchangeable with prior model years. In 2004 the driver and passenger buckles became unique part numbers, due to the removal of the buckle switch at the passenger seating position. The current production driver seat belt buckle remains interchangeable back to the 2002 model year.

The tongue assembly (latchplate) at the driver and passenger seating positions is the same part number (TRWA #33014254) and has been used on all driver and passenger retractor assemblies from 2002 start of production to 2006 current production.

A detailed summary of all pertinent buckle and tongue assembly design change information is being submitted as Enclosure 10 – CHANGE HISTORY, CONFIDENTIAL to Ms. Jacqueline Glassman, Office of the Chief Counsel, under separate cover with a request for confidential treatment of information.

Q10. Produce one of each of the following:

- a. **Exemplar samples of each design version of the subject components;**
- b. **Field return samples of the subject component exhibiting the subject failure mode;**
- c. **Any kits that have been released, or developed, by DaimlerChrysler for use in service repairs to the subject component/assembly which relate, or may relate, to the alleged defect in the subject vehicles.**

A10. DCC will provide NHTSA with 2 new front seat belt buckle samples, for the 2002 model year KJ vehicle, obtained through Mopar. The same buckle assembly part number is used at both the driver and passenger seating positions. Changes in subsequent years of production are interchangeable with the 2002 model year KJ vehicles, therefore the supplied 5JW77TRMAA buckles are direct replacements for the 2002 KJ buckle assembly part numbers 5GM34TRMAB, AC, AD, or AE.

While a small sample of parts have been received to date from the warranty parts return program that was initiated by DCC, none of the returned buckle assemblies exhibit the alleged condition that either prevents or inhibits the buckle's ability to latch or unlatch, or cause the buckles to false latch as previously defined by DCC. Nonetheless, DCC will provide NHTSA with a field return sample of the buckle assembly exhibiting separated latch guide leaf springs.

There have been no kits released or developed by DCC for use in service repairs to the subject component / assembly which relate, or may relate, to the alleged condition in the subject vehicles.

Q11. State the number of each of the following that DaimlerChrysler has sold that is used in the subject vehicles by component name, part

number (both service and engineering / production), and the month/year of sale (including the cut-off date for sales, if applicable):

- a. Subject components;**
- b. Any kits that have been released, or developed, by DaimlerChrysler for use in service repairs to the subject component/assembly.**

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 which DaimlerChrysler has produced that contain the identical subject components, whether installed in production or in service, and state the applicable dates of production or service usage.

- A11. The part sales information is included in Enclosure 11 – MOPAR REPLACEMENT SALES. It is impossible to determine what these part sales are for. There are other customer issues (e.g., customer damage, accident repair) 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.**

**The supplier contact is:
Rob Ellis, Product Performance Manager, 586-781-7200.**

**The supplier address is:
TRW Automotive, 4505 W. 26 Mile Rd., Washington, MI 48094-2800.**

- Q12. Furnish DaimlerChrysler's assessment of the alleged defect in the subject vehicle, including:**
- a. The causal or contributory factor(s);**
 - b. The failure mechanism(s);**
 - c. The failure mode(s);**
 - d. The risk to motor vehicle safety that it poses;**
 - e. 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**
 - f. The reports included with this inquiry.**
- A12. Since the opening of PE05-046 approximately 6 weeks ago, DCC has completed a thorough investigation and analysis into the potential causes**

for complaints regarding 2002 KJ front driver and passenger seat belt buckles and latch plate tongues, that may either prevent or inhibit the buckles ability to latch or unlatch, or cause the buckle to false latch (DCC is unsure of the definition of the term "false latch". For purposes of this response, DCC defines false latch as any condition of partial engagement in which the latch plate tongue appears to the operator to be fully engaged. DCC is unaware of and unable to create a "false latch" condition with the subject buckles).

- Thorough analysis of complaint narratives from multiple sources.
- Retrofit and evaluation of components from complaint vehicles.
- Institution of a warranty part retention program.
- Evaluated past warranty return history from PRAS and TRWA.
- Performed Materials Testing (DCC and TRWA) on field returned buckle components.
- Performed Laboratory Testing (DCC and TRWA) on field returned buckle assemblies.

Although these efforts have been extensive, DCC has not found or been able to reproduce samples of the condition alleged by NHTSA in the subject vehicle population. While samples of the returned buckles examined contained separated latch guide leaf springs, some of which caused the buckle button to intermittently remain partially depressed, the button returned to the normal design position and the latch plate tongue became fully latched once inserted into the buckle. All of the returned samples completely latched and unlatched the tongue. No instances of tongue partial engagement were exhibited in any of the returned samples reviewed.

Functional testing of 2 returned buckle assemblies was performed by TRWA. These 2 buckles included 1 from the DCC Warranty Retention and 1 from a retrofitted VOQ vehicle (Reference No. 10135119). The warranty returned buckle had separated latch guide leaf springs that were no longer contained within the buckle cover or mechanism (were present in the warranty return bag). The VOQ buckle was noted to also have separated latch guide leaf springs. It also appeared that possibly both of the separated springs were still within the buckle cover / mechanism. The intent of the tests was to determine if the separated latch guide leaf springs had a negative effect on buckle latching / unlatching performance or integrity of latching. Per the TRWA report attached in Enclosure 9, both buckle assemblies successfully completed the requested latching & unlatching cycling, tongue insertion & release force, and ultimate tensile strength for the buckle / tongue assemblies. The latching, unlatching, and ultimate tensile strength testing completed on these parts is per DCC

Performance Specification PF-8099, which exceeds FMVSS 209 requirements for comparable tests.

The Jeep Liberty is the only DCC current production vehicle that utilizes TRWA buckles. TRWA has indicated that the front buckles used in the Jeep Liberty are part of a family of buckles identified as RNS3G and that this family of buckles is widely used by many of its customers, encompassing a wide variety of vehicle models. The buckle assemblies used in the Jeep Liberty have external surface modifications made to the button face and buckle cover for DCC styling purposes. These external cosmetic changes in no way altered the internal function of the RNS3G buckle mechanism. To date, DCC and TRWA have installed or supplied more than 1,800,000 front buckle assemblies into 2002 – 2006 Jeep Liberty vehicles. Quantities relating to all RNS3G applications, other than the DCC Jeep Liberty, were asked for but not provided to DCC. If additional volume and usage information is desired, please contact TRW Automotive.

Of the 58 unique VINs identified from all data sources that have been deemed by DCC to possibly be related to the alleged condition, none have resulted in accidents, injury or property damage. These 58 inputs represent only 0.014% of the total 2002 model year Jeep Liberty front seat buckle installations. This does not represent a trend, safety or otherwise.

It is the assessment of DCC that while a small number of customers have registered complaints involving latching and unlatching of their front seat belt buckles, the causes associated with the complaints are quite varied. Contamination, whether liquid or solid, has proven itself to be a significant factor during returned part reviews. Damage and abuse to the buckle's external and internal components has also been shown as a significant factor. The samples of returned / acquired buckles that DCC has reviewed subsequent to the opening of PE05-046 have shown that the function and performance of the buckles, from a safety perspective, has not been compromised. Testing and analysis has clearly shown that the buckles latch, unlatch and retain their structural integrity. DCC believes the complaints received to date are of a customer satisfaction variety, are not safety related, and that PE05-046 should be closed.