

DAIMLERCHRYSLER

Handwritten: 12/10/05

December 15, 2005

DaimlerChrysler Corporation

Mr. Jeffrey L. Quandt, Chief
Vehicle Control Division
Office of Defects Investigation
National Highway Traffic Safety Administration
U.S. Department of Transportation
400 Seventh Street, S.W.
Washington, DC 20590

Stephan J. Speth
Director
Vehicle Compliance & Safety Affairs

Reference: NVS-213dtr, PE05-050

Dear Mr. Quandt:

This document contains DaimlerChrysler's Corporation's (DCC) response to the referenced inquiry dated October 18, 2005 regarding information concerning the fuel tank assembly in the 2003-2005 model year Pacifica vehicles. By providing the information contained herein, DCC is not waiving its claim to attorney work product and attorney-client privileged communications.

The scope of this response is limited to 2004-2005 model year Pacifica (body model designation CS) vehicles manufactured for sale or lease in the United States, since there were no 2003 model year CS vehicles manufactured.

The fuel tank assembly in the subject peer vehicles meets or exceeds all applicable FMVSS standards, as well as all DCC specifications and design guidelines. Although the data contained within this response does reference some allegations of fuel tank damage from road debris, it is unreasonable to believe that any fuel tank assembly would be immune to all conceivable damage from the wide variety of debris that may be encountered during typical driving situations. In addition, DCC is not aware of any reports involving crash, injury, fire, property damage or fatality related to the subject vehicle fuel tank damage from road debris.

Sincerely,

Handwritten signature of Stephan J. Speth
for Stephan J. Speth

cc: Kathleen DeMeter

Attachment and Enclosures

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 peer vehicle manufactured to date by DaimlerChrysler, state the following:

- a. Vehicle Identification Number (VIN);
- b. Model;
- c. Model Year;
- d. Date of manufacture;
- e. Date warranty coverage commenced; and
- f. The state in the United States where the vehicle was originally sold or leased (or delivered for sale or lease).

Provide this information in Microsoft Access 2003, or a compatible format, entitled "PE05-050 DAIMLERCHRYSLER PRODUCTION DATA."

Note: Unless otherwise indicated in the question response, all data contained in this response is through October 20, 2005.

A1. The Pacifica vehicle (body model designation "CS") was a new vehicle introduced for the 2004 model year; there were no 2003 model year vehicles manufactured or sold. During the 2004 and 2005 model years, DaimlerChrysler Corporation ("DCC") manufactured 217,147 CS vehicles for sale or lease in the U.S. market.

Model Year (MY)	Make / Model	U.S. Market Volume
2004	Chrysler / Pacifica	98,583
2005	Chrysler / Pacifica	118,564
Total Volume 217,147		

The detailed response that lists the production data is provided in Enclosure 1 as a Microsoft Access 2000 file, 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 fire, 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
- 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 "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 "e" 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" through "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.

- a. There are a total of 13 customer complaints (for 10 unique VINs) that allege fuel tank damage from road debris. There are an additional 5 complaints (for 5 unique VINs) that allege fuel tank damage from an unknown source that may have been road debris.

Criteria	2004 MY	2005 MY	Total	Unique VINs
Fuel Tank Damage Alleged from Road Debris	6	7	13	10
Fuel Tank Damage Unknown Source	2	3	5	5
Total Complaint Count	8	10	18	15

- b. There are a total of 121 field reports (for 120 unique VINs) that allege fuel tank damage from road debris.

Criteria	2004 MY	2005 MY	Total	Unique VINs
Fuel Tank Damage Alleged from Road Debris	89	32	121	120

- c. There are no reports involving crash, injury or fatalities for the subject peer vehicles that are responsive to this inquiry.
- d. There are no reports involving fires for the subject peer vehicles that are responsive to this inquiry.

- e. There are no claims involving property damage for the subject peer vehicles that are responsive to this inquiry.
 - f. There are no third party arbitration proceedings, where DCC is or was a party to the arbitration, responsive to this inquiry.
 - g. There are no lawsuits, either pending or closed, against DCC, or notices received by DCC that are responsive to this inquiry.
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 a fire is alleged;
 - k. Whether property damage is alleged;
 - l. Number of alleged injuries, if any; and
 - m. Number of alleged fatalities, if any;

Provide this information in Microsoft Access 2003, or a compatible format, entitled "PE05-050 DAIMLERCHRYSLER REQUEST NUMBER TWO DATA".

- A3. The detailed summary of all requested information in response to Request No. 2 is provided in Enclosure 3 as a Microsoft Access 2000 compatible format, titled "Request Number 2 Data".
4. Produce copies of all documents related to each of items "c" through "e" within the scope of Request No. 2. Organize the documents separately by category (i.e., crash/injury/fatality reports, property damage claims, etc.) and describe the method DaimlerChrysler used for organizing the documents.
- A4. There are no documents relative to items "c" through "e" within the scope of Request No. 2 that are responsive to this inquiry.

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 a procedure specified in a technical service bulletin or customer satisfaction campaign.

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

- a. DaimlerChrysler 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 2003, or a compatible format, entitled "PE05-050 DAIMLERCHRYSLER WARRANTY DATA."

A5.

Model Year	Warranty Claims
2004	174
2005	108
Total Claims	282

It is often not possible to determine whether each particular warranty claim is related to the alleged condition. There may be other random issues not related to the alleged condition that still trigger replacement of the subject components. DCC has concluded that warranty data cannot be utilized to determine any trend related to the alleged condition.

The detailed response that lists the warranty claim information is provided in Enclosure 5 as a Microsoft Access 2000 compatible format, titled "Warranty Data".

6. Describe in detail the search criteria used by DaimlerChrysler to identify the claims 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 in Microsoft Access 2003, or a compatible format. Also 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).

- A6. The search criteria used by DCC to identify claims in response to Request No. 5 can be found in the charts below:

Repair Description	Labor Operation Code
Fuel Tank Replacement	14600109

Failure Code	Description
A4	Fuel Leak – Seam
X2	Split, Cut or Torn
41	Foreign Material

The standard warranty offered by DCC on all 2004 and 2005 model year CS vehicles was 3 years or 36,000 miles. There was no extended warranty coverage option that 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 thus not included with this response.

7. Produce copies of all service, warranty, and other documents that relate to, or may relate to, the subject condition in the subject peer 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, and/or other documents that relate to, or may relate to the alleged condition in the subject peer vehicles that DCC has issued to any dealers, regional or zone offices, field offices, fleet purchasers or other entities. DCC has no plans to issue any such documents in the next 120 days.
8. Provide the following information concerning the subject fuel tank assemblies:
- Drawings showing the nominal and minimum (full jounce) design ground clearance of the subject fuel tank assembly and the corresponding location(s) on the tank assembly—state all assumptions (e.g., tire inflation pressure);
 - Identify all subject vehicle components that have lower ground clearances for each condition cited in “8.a” than the subject fuel tanks and state the location and ground clearance dimension of each;
 - State the minimum design ground clearance for each condition cited in “8.a” for the subject vehicles, the basis for that dimension, the associated component/structure, and the location;

- d. Provide a bottom view drawing or picture showing the undercarriage of the vehicle in the fully built configuration with the fuel tank and the locations of all components identified in "8.b" and "8.c" clearly marked;
- e. Copies of all engineering specifications relating to the packaging, shielding, ground clearance, and/or puncture resistance of the subject fuel tanks;
- f. Copies of all engineering standards, design guides, or similar documents that relate in any way to the packaging, shielding, ground clearance, and/or puncture resistance of fuel tanks in passenger cars or light trucks (including vans and utility vehicles);

A8.

- a. Below is a drawing (Figure 8.a) illustrating the full jounce ground clearance for the fuel tank (89.9 mm). The assumptions made for the curb ground line condition are: 1) tire pressure of 33 psi, 2) 5 passengers, 3) full tank of gas and 4) maximum cargo. The assumption made for the full jounce condition is the curb ground line condition plus 105 mm.

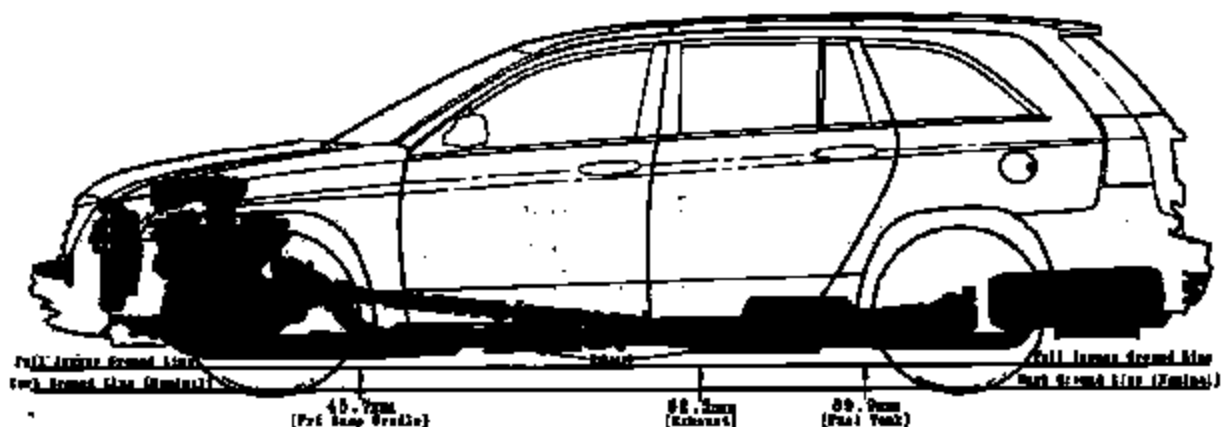


Figure 8.a

- b. The subject vehicle components that have lower full jounce ground clearances are the exhaust (62.3mm) and front suspension cradle (45.7 mm). Locations for these components are shown in Figure 8.a above.
- c. The minimum design ground clearance for the components listed above:
 - 1) Front suspension cradle: 150.7mm (45.7 + 105),
 - 2) Exhaust: 167.3mm (62.3 + 105), and
 - 3) Fuel tank: 194.9mm (89.9 + 105).

Locations for these components are shown in Figure 8.a. above.

- d. Below is a bottom view drawing (Figure 8.d) of the undercarriage of the subject peer vehicle with the exhaust, front suspension cradle, and fuel tank included.

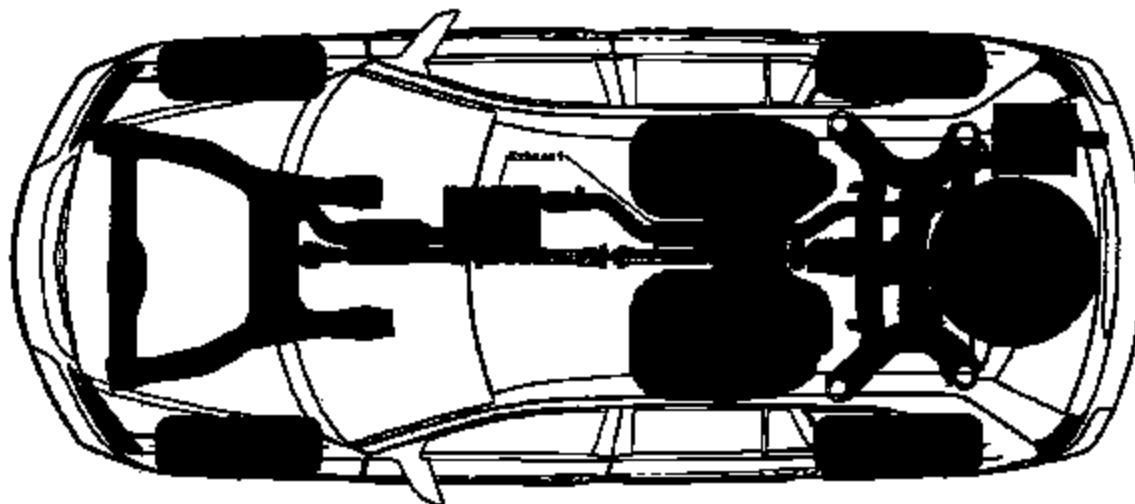


Figure 8.d

- e. The following engineering standards, design guidelines, or similar documents relate to the packaging, shielding, ground clearance, and/or puncture resistance of fuel tanks in passenger cars or light trucks (including vans and utility vehicles):
- 1) Plastic Fuel Tank Design SOP
 - 2) Engineering Standard PF 8950: Fuel Tank Assemblies – High Density Polyethylene Performance Standard
 - 3) Engineering Standard PF 4660: Fuel Tank Impact Performance Standard

These documents are being submitted as Enclosure 8 (Confidential) on CD-ROM to Mr. Stephen P. Wood, NHTSA Office of the Chief Counsel, under separate cover with a request for confidential treatment of information.