

# DAIMLERCHRYSLER

*Speth*  
5/11/06

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

May 9, 2006

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

OFFICE OF DEFECTS INVESTIGATION  
NHTSA  
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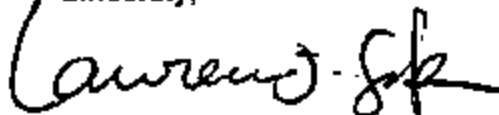
Dear Ms. DeMeter:

Reference: NVS-212mj; EA06-003

This document contains DaimlerChrysler Corporation's ("DCC") response to the referenced inquiry.

DCC continues to believe that the alleged defect poses no unreasonable risk to motor vehicle safety.

Sincerely,



for Stephan J. Speth

Attachment and Enclosures

**Q1. Describe and identify all vehicle tests, whether crash, sled, computer crash simulations, or otherwise, related to Federal Motor Vehicle Safety Standard (FMVSS) No. 208, which were conducted by, or for, DaimlerChrysler, and were used to develop, or to evaluate, for any reason, the frontal air bag systems in the subject vehicles. This should include, but is not limited to, all certification tests related to FMVSS 208. For each such test, provide the following information:**

- a. Test number;**
- b. Test date;**
- c. Test vehicle (state model, model year, VIN and date of manufacture);**
- d. Summary of the subject and objective of the test; and**
- e. Summary of the findings and/or conclusions resulting from the test, including but not limited to, all crash dummy injury measurements.**

**A1. DCC has conducted a reasonable and diligent search for the requested items and has found the following:**

- No computer simulations conducted by DCC with regard to FMVSS 208 development
- 80 Vehicle Crash (VC) tests conducted either at DCC's test facilities or on DCC's behalf. There are 11 Impact Simulator (IS) tests conducted at DCC test facilities. The FMVSS 208 certification test reports (22) are in Enclosure 1. The FMVSS 208 development test reports (69) are in Enclosure 2 - CONFIDENTIAL supplied to Office of the Chief Counsel, under separate cover with a request for confidential treatment. The 11 impact simulator tests are included in Enclosure 2.
- There were many more Impact simulator tests conducted for the subject vehicles at the front airbag supplier, Key Safety Systems. However, DCC does not have summaries of that testing responsive to this request.

DCC's 208 crash test development process utilized test results for each test during the engineering development process to support decisions for the next test or series of tests. The end result of this process is the certification testing that has been conducted and is documented. The interim decision making steps including the conclusions from each test are not archived or memorialized in the normal course of business. The end result of the entire process is the certification testing and resultant compliance reports which are maintained. Therefore, the summary data in the provided reports is the closest approximation to answering part e of this question that DCC has available.

It is also important to note that some of the tests are labeled as 2003 or 2004 model year because the original plan was to introduce up front sensors into those earlier model years. However, the 2005 model year was the first application of up front sensors for the RS body vehicles. Please disregard the labeling of such tests. The 2003 or 2004 model year RS minivans did not utilize up front sensors.

**Q2. Describe and identify all other vehicle frontal crash tests not identified above that were conducted by, or for, DaimlerChrysler that were used to develop, or to evaluate, for any reason, the frontal air bag systems in the subject vehicles. This should include, but is not limited to, frontal offset and frontal oblique crash conditions, not required by FMVSS 208. For each crash test, provide the following information:**

- a. Test number;
- b. Test date;
- c. Test vehicle (state model, model year, VIN and date of manufacture);
- d. Summary of the subject and objective of the test; and
- e. Summary of the findings and/or conclusions resulting from the test, including but not limited to, all crash dummy injury measurements.

**A2.** DCC has conducted a reasonable and diligent search for the requested items and has found 66 Vehicle Crash (VC) tests conducted either at DCC's test facilities or on DCC's behalf. Summaries and test objectives of these tests are included in Enclosure 3 - CONFIDENTIAL supplied to Office of the Chief Counsel, under separate cover with a request for confidential treatment.

DCC's 208 crash test development process utilized test results for each test during the engineering development process to support decisions for the next test or series of tests. The end result of this process is the certification testing that has been conducted and is documented. The interim decision making steps including the conclusions from each test are not archived or memorialized because the end result of the entire process, the certification testing, speaks for itself. Therefore, the summary data in the provided reports is the closest approximation to answering part e of this question that DCC has available.

It is also important to note that some of the tests are labeled as 2003 or 2004 model year because the original plan was to introduce up front sensors into those earlier model years. However, the 2005 model year was the first application of up front sensors for the RS body vehicles. Please disregard the labeling of such tests. The 2003 or 2004 model year RS minivans did not utilize up front sensors.