

# DAIMLERCHRYSLER

*Frank*  
1/31/07

DaimlerChrysler Corporation

Stephan J. Speth

Director

Vehicle Compliance & Safety Affairs

January 26, 2007

Mr. Jeffrey Quandt  
Office of Defects Investigation  
National Highway Traffic Safety Administration  
U.S. Department of Transportation  
400 Seventh Street, SW  
Washington, D.C. 20590

Reference: NVS-213swmc; EA06-004


Dear Mr. Quandt,

This document contains DaimlerChrysler Corporation's (DCC's) response to the electronic mail inquiry from your staff DCC received on December 4, 2006. In reaching the 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.

Out of 553,647 2004 – 2007 model year Dodge Durango and 2005 – 2007 model year Dodge Dakota vehicles there are no reports included in this response of intermediate shaft or steering wheel separation, accidents, injuries or property damage due to the alleged condition in the subject vehicles.

DCC does not believe that the alleged condition poses an unreasonable risk to motor vehicle safety.

Sincerely,

  
Stephan J. Speth

Attachments and Enclosures

1. State, by model and model year, the number of subject vehicles DCC has manufactured for sale or lease in the United States. Separately, for each subject vehicle manufactured to date by DCC, 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 the table in Microsoft Access 2000, or a compatible format, entitled "PRODUCTION DATA." See Enclosure 1, Data Collection Disc, for a pre-formatted table which provides further details regarding this submission.

Note: This document contains information from July 1, 2006 through December 4, 2006, the date the email request was received. June 30, 2006 was the cut off date for the original EA06-004 response.

- A1. The volumes listed in the chart below are for the entire subject vehicle population for each model year.

Model Year	Make & Model (Designation)	U.S. Market Volume
2004	Dodge Durango (HB)	129,967
2005	Dodge Durango (HB)	114,642
2006	Dodge Durango (HB)	83,815
2007	Dodge Durango (HB)	9,957
2005	Dodge Dakota (ND)	113,846
2006	Dodge Dakota (ND)	85,212
2007	Dodge Dakota (ND)	16,208
	<b>Total Volume</b>	<b>553,647</b>

The detailed data is provided in Enclosure 1 "Production Data".

2. 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:
  - 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 DCC is or was a party to the arbitration; and**
- g. Lawsuits, both pending and closed, in which DCC 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 "e," 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 "f" and "h," 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 reports of events identified by DaimlerChrysler Corporation (DCC) that relate to, or may relate to the alleged defect. DCC has conducted a reasonable and diligent search of the normal repositories for such information.
- a. There are zero Durango (HB) and zero Dakota (ND) customer complaints that relate to, or may relate, to the alleged condition.
  - b. There are zero Durango (HB) field reports containing that relate to, or may relate to, the alleged condition. There is one Dakota (ND) field report that relates to, or may relate to, the alleged condition.

**Field Reports by Unique VIN:**

Model	Steering Wheel		Intermediate Shaft → Low Torque				Intermediate Shaft → Missing			
	Loose	Missing	@Column	Upper U-Joint	@Gear	Location Unknown	@Column	Upper U-Joint	@Gear	Location Unknown
04HB	0	0	0	0	0	0	0	0	0	0
05HB	0	0	0	0	0	0	0	0	0	0
06HB	0	0	0	0	0	0	0	0	0	0
07HB	0	0	0	0	0	0	0	0	0	0
05ND	0	0	0	0	0	0	0	0	0	0
06ND	1	0	0	0	0	0	0	0	0	0
07ND	0	0	0	0	0	0	0	0	0	0

- c. There are zero reports involving crash, injury or fatality that are responsive to this inquiry.
  - d. There are zero reports involving fire that are responsive to this inquiry.
  - e. There are zero claims that allege property damage that are responsive to this inquiry.
  - f. There are zero third party arbitration proceedings where DCC is, or was, a party to the arbitration, that are responsive to this inquiry.
  - g. There are zero lawsuits, either pending or closed, against DCC, in which DCC is or was a defendant or codefendant, 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. DCC'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.

**Provide this information in Microsoft Access 2000, or a compatible format, entitled "REQUEST NUMBER TWO DATA." See Enclosure 1, Data Collection Disc, for a pre-formatted table which provides further details regarding this submission.**

- A3. The detailed summary of all requested information in response to Request 2 is provided in Enclosure 2 as a Microsoft access 2000 compatible format, titled "Request Number 2 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 DCC used for organizing the documents.**
- A4. A copy of the document within the scope of Request 2 is provided in Enclosure 3, titled "Field Report".
- 5. 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: 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, 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." See Enclosure 1, Data Collection Disc, for a pre-formatted table which provides further details regarding this submission.**

Mr. Jeffrey Quandt  
Reference: NVS 213 swmc; EA06-004 Update  
January 26, 2007

ATTACHMENT

- A5. Claims submitted relate to, or may relate to the alleged condition of a loose or missing steering shaft coupling or steering wheel retaining bolt.

**Warranty Claims by Model and Model Year:**

<b>Model Year</b>	<b>Dodge Durango (HB)</b>	<b>Dodge Dakota (ND)</b>	<b>Total Claims</b>
2004	2	N/A	2
2005	18	74	92
2006	10	54	64
2007	1	1	2
<b>Total Claims</b>	<b>31</b>	<b>129</b>	<b>160</b>

After thorough review of the warranty claims it is clear that the vast majority of claims are based on noise while turning. In many cases, Dealers have been instructed to loosen the bolts, realign the shaft and retorque the bolts to resolve the noise.

The detailed response that lists the warranty claim information is provided in Enclosure 4, titled "Warranty Data". DCC has concluded that warranty data cannot be utilized to determine any trend related to the alleged condition."