DAIMLERCHRYSLER

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

November 10, 2006

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

Reference: NVS-212MBS; EA06-015

Dear Ms. DeMeter:

This document contains DaimlerChrysler Corporation's ("DCC's") response to the referenced inquiry regarding alleged instrument panel fires in some 2004-2005 model year Dodge Durango vehicles. 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.

Preliminary evaluation has indicated that a small number of instrument cluster failures may originate from an integrated circuit used to control vehicle interior lighting functions. Analysis has also indicated that this integrated circuit may experience electrical overload during certain operating conditions. DCC continues investigation into this issue, and will provide NHTSA with updates as additional information becomes available.

Sincerely,

Stephan J. Speth

Attachment and Enclosures

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

ATTACHMENT

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. **Make;**
   c. **Model;**
   d. **Model Year;**
   e. **Instrument cluster part number**
   f. **Date of manufacture;**
   g. **Date warranty coverage commenced; and**
   h. **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."

NOTE: UNLESS OTHERWISE INDICATED IN THE RESPONSE TO ANY OF THE QUESTIONS, THIS DOCUMENT CONTAINS INFORMATION FROM MAY 5, 2006 (INFORMATION CUT-OFF DATE FOR RQ06-006) THROUGH SEPTEMBER 20, 2006 (DATE THE INFORMATION REQUEST FOR EA06-015 WAS RECEIVED).

A1. The chart below lists the 2004 - 2005 model year ("MY") Dodge Durango sport utility vehicles (body model designation "HB") that have been manufactured by DaimlerChrysler Corporation ("DCC") for sale or lease in the United States.

Model Year	2004	2005
Volume	129,967	114,642
Total Volume = 244,609		

The information requested in questions 1a - 1d and 1f - 1h is provided in Enclosure 1 as a Microsoft Access table titled "PRODUCTION DATA".

Per agreement between Thomas Cooper, NHTSA ODI Chief, and members of my staff via e-mail on October 6, 2006, the instrument cluster part number information by vehicle requested in question 1e is not included in Enclosure 1.

The instrument clusters for all 2004 - 2005 MY HB vehicles utilize identical circuit boards. External differences exist in the finish and/or color of the trim rings that surround the cluster gauges, the gauge hubs and the pointers, depending on the level of vehicle trim. This

information, including a description of instrument cluster by part number, was previously provided by my staff to Thomas Cooper via e-mail on September 18, 2006, as a follow up question regarding Recall Query RQ06-006.

2. **State, by model and model year, the number of vehicles that have received the remedy for Recall 03V-528. Separately, for each of the vehicles covered by Recall 03V-528, state the following:**

   a. **Vehicle identification number (VIN);**
   b. **Make;**
   c. **Model;**
   d. **Model Year;**
   e. **Date of manufacture;**
   f. **Date warranty coverage commenced;**
   g. **Date Recall 03V-528 repairs were completed;**
   h. **Vehicle mileage when Recall 03V-528 repairs were completed;**
   i. **The State in the United States where the vehicle was originally sold or leased (or delivered for sale or lease); and**
   j. **The State in the United States where the Recall 03V-528 repairs were completed.**

   Provide the table in Microsoft Access 2000, or a compatible format, entitled "RECALL DATA."

A2. The information requested in questions 2a - 2h and question 2j is provided in Enclosure 2 as a Microsoft Access table, titled "RECALL DATA". Per agreement between Thomas Cooper and members of my staff via telephone conversation on October 10, 2006, the information requested in question 2i is not included in Enclosure 2, since it is included in response to question 1g in Enclosure 1.

3. **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;

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 "g", 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 "c" and "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.

A3. The following summarizes the non-privileged reports identified by DCC that relate to, or may relate to, the alleged condition (overheating, smoke, fire or melting, sparks or smoldering) for the subject component (instrument cluster circuit board) in the subject vehicles (2004 - 2005 MY HB vehicles manufactured for sale or lease in the US). DCC has conducted a reasonable and diligent search of records kept in the ordinary course of business for such information.

a. There are a total of 37 customer complaints for 37 unique Vehicle Identification Numbers ("VINs") that relate to, or may relate to, the alleged condition. These customer complaints in the DCC system are referred to as Customer Assistance Inquiry Requests ("CAIRs").

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

c. There are no reports alleging crash or fatality responsive to this investigation. There are no reports alleging injury responsive to this investigation.

d. There are no reports involving a fire, based on claims against DCC involving a death or injury, or notices received by DCC alleging or proving that a death or injury was caused by the alleged condition in a subject vehicle.

e. There are 13 property damage claims responsive to this investigation. For purposes of this response, property damage is defined as any non-vehicle article that was allegedly damaged during the reported incident.

f. There are no third-party arbitration proceedings where DCC is, or was, a party to the arbitration, that are responsive to this investigation.

g. There are 3 lawsuits and 33 three legal claims involving DCC with allegations of overheating, smoke or fire originating from the instrument cluster.

MY	Customer Complaints	Field Reports	Claims / Lawsuits
2004	34	0	31/2
2005	3	0	2/1

Total Unique VINs that may relate to the alleged condition = 46

Due to some complainants providing more than one input, there are 46 unique VINs associated with 73 total customer complaints, field reports, legal claims and lawsuits.

Note: This response to Request Number 3 includes all reports identified by DCC that relate to, or may relate to the alleged condition. None of these reports were specific to the population contained in recall 03V-528 (DCC recall designation "C43").

4. Separately, for each item (complaint, report, claim, notice, or matter) within the scope of your response to Request No. 3, 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 a fire is alleged;
k. Whether property damage is alleged;
l. Number of alleged injuries, if any;
m. Number of alleged fatalities, if any; and

n. DCC's assessment as to whether the incident described in each item is related to the recalled cracked capacitor (C293), the integrated circuit Z107, other causes or unknown.

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

A4. The information requested in questions 4a - 4n is provided in Enclosure 3 as part of a Microsoft Access table, titled "REQUEST NUMBER THREE DATA."

5. Produce copies of all documents related to each item within the scope of Request No. 3. Organize the documents separately by category (i.e., consumer complaints, field reports, etc.) and describe the method DCC used for organizing the documents.

A5. Copies of all documents related to each item within the scope of Request Number 3 are provided in Enclosure 3, titled "FIELD DATA."

The data within Enclosure 3 is organized in the following manner: Contained within the enclosure are two folders (named "Consumer Complaints" and "Legal Claims"). The Customer Complaint folder contains sub-folders for each complaint, named using the CAIR number, and each contains additional sub-folders with the complaint correspondence and photographs (as applicable). The Legal Claims folder contains separate sub-folders for each legal claim and lawsuit, using the claimant's last name to identify the sub-folder. Each of these legal sub-folders will contain the summary, along with other applicable information.

6. 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, customer satisfaction campaign or recall (in your response, specifically identify all claims for recall 03V-528).

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."

A6. There are no Labor Operation ("LOP") codes within the DCC warranty claim system that apply to any type of vehicle fire.

The eight digit LOP code for cluster replacement is 08451001. There are no applicable problem or fault codes relating to this investigation.

DCC's warranty system is designed and utilized to compensate dealers for repairs made, and thus cannot be used to determine any trend related to an alleged condition, since it is often difficult to determine the reason for any particular warranty claim. There are random issues not related to an investigation that may still trigger replacement of the subject component. For example, instrument clusters may be replaced under warranty for cosmetic imperfections, sticking pointers, indicator malfunctions, or for a number of other reasons not related to the alleged condition.

Reports alleging fire are generally received by the DCC Office of the General Counsel, the DaimlerChrysler Customer Assistance Center (as a CAIR) or from other DCC field organizations. If an alleged fire event comes to the attention of a dealer technician during a warranty repair, the dealership is required to notify DCC and a CAIR is created. These CAIRs, to the extent they are responsive to this investigation, are being submitted in response to questions 2, 3 and 4.

The data in the following chart represents the 2004 - 2005 MY HB cluster replacement claims under warranty submitted between May 5, 2006 and September 20, 2006.

LOP code	2004 MY	2005 MY	Total
08451001	702	277	979

The warranty data requested in questions 6a - 6k as applicable is provided as a Microsoft Access table in Enclosure 4, titled "WARRANTY DATA".

Recall C43 involved 27,586 2004 MY HB vehicles sold or leased in the US. As of September 20, 2006 over 24,300 (or 88%) of the vehicles involved in C43 have been repaired. The following LOP codes are specific to recall C43, and represent repairs completed between May 5, 2006 and September 20, 2006.

Recall C43 LOP code - description	Vehicles repaired
08C43182 - remove "C293" capacitor	53
08C43183 - replace instrument cluster	6
Total	59

It is important to note that the scope of recall C43 has not changed since the recall was issued. The "C293" capacitor was eliminated from the instrument cluster in production as of December of 2003, and none of the fires reported to DCC involving vehicles built after that date can be attributed to that capacitor.

7. **Describe in detail the search criteria used by DCC to identify the claims identified in response to Request No. 6, 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, by make and model year, the terms of the new vehicle warranty coverage offered by DCC 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) that DCC 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.**

A7. There are two unique LOP codes applicable to recall C43 (08C43182 - remove capacitor and 08C43183 - replace instrument cluster). Repair data from recall C43 is contained in the chart above responsive to question number 6.

There are no LOP codes within the DCC warranty claim system that apply to any type of vehicle fire. The eight digit LOP code for cluster replacement is 08451001. There are no applicable problem codes or fault codes relating to this investigation, so by default the warranty system returns all claims that match the eight digit LOP code.

The standard warranty offered on all 2004 - 2005 MY HB vehicles was 36 months / 36,000 miles. DCC did not offer extended warranty coverage related specifically to the subject component.

8. **Produce copies of all service, warranty, and other documents that relate to, or may relate to, the alleged defect in the subject vehicles, that DCC 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 DCC is planning to issue within the next 120 days.

A8. Recall C43 was issued in December of 2003. This recall specified the removal of a redundant capacitor ("293") from the right side of the 2004 MY HB instrument cluster circuit board. This capacitor could overheat and potentially cause a fire in the instrument cluster. A copy of the dealer service instructions and owner notification letter is provided for reference in Enclosure 5, titled "RECALL DOC C43".

Recall Query RQ 06-006, which investigated the effectiveness of recall C43, was closed by NHTSA ODI on August 28, 2006.

No service, warranty, or other documents that relate to the alleged condition in the subject vehicles have been issued by DCC to any dealers, regional or zone offices, field offices, fleet purchasers, or other entities, nor are any planned for release within the next 120 days.

9. Describe all assessments, analyses, tests, test results, studies, surveys, simulations, investigations, inquiries and/or evaluations, including development or other pre-production tests, (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, DCC. 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.

A9. In April of 2006, DCC opened an internal investigation into reports of 2004 MY HB instrument panel fires that appeared to be originating at the upper left side of the instrument cluster circuit board. Participants in this investigation included the DCC Vehicle Safety Office, DCC Engineering, Siemens/VDO Engineering (formerly DCC - Huntsville Electronics) in Huntsville, Alabama and Freescale (formerly Motorola) in Touloose, France.

Analysis of instrument clusters returned to Siemens/VDO for analysis has indicated a potential issue with an integrated circuit used in the 2004 - 2005 MY HB instrument cluster to control interior lighting functions. Several of these Z107 (also designated as SPI 12 in supplier documents) integrated circuits were returned to Freescale for additional assessment. Preliminary analysis has indicated that the integrated circuit may have experienced Electrical Overload Stress (EOS). Current and thermal limiting functions are built into this integrated circuit so that during normal operation shut down occurs in the event of over-current or over-temperature conditions. If EOS damage has occurred, these limits may no longer function properly.

Siemens/VDO has performed instrument cluster testing with various known conditions of the Z107 integrated circuit and increased interior lamp loads. During this testing, it was discovered that a current limiting setting, along with the power FET selected to control the interior lighting function, may have had an effect on this EOS condition. Additional testing simulating in-rush current was developed to assess the effects of modifying the current limiting setting and reassignment of the interior lighting functions to an unused high side driver in the Z107 integrated circuit.

The following listing summarizes "actions" conducted that may relate to the alleged condition in the subject vehicles:

1. 2004 HB Analysis Studies
2. Black Belt Problem Solving
3. DVD of Simulated Failure
4. DVP&R Test Plan
5. HB Meeting Minutes
6. Hot Trip Data
7. Load Studies
8. Specifications
9. Test Plan
10. Test Report on Clusters in Load Cell
11. Test Results

Copies of documents relating to these actions are being submitted as Enclosure 6, titled "CONFIDENTIAL", to the NHTSA Office of the Chief Counsel under separate cover with a request for confidential treatment of information.

10. Describe all modifications or changes made by, or on behalf of, DCC in the design, material composition, manufacture, quality control, supply, or installation of the subject component, from the start of production to date, which relate to, or may relate to, the alleged defect in the subject vehicles. Include all modifications or changes made to production vehicles produced subsequent to the recall scope. 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 DCC is aware of which may be incorporated into vehicle production within the next 120 days.

A10. A summary of the design change information for the subject vehicle subject component is being submitted as Enclosure 7, titled "CHANGE HISTORY - CONFIDENTIAL", to the NHTSA Office of the Chief Counsel under separate cover with a request for confidential treatment of information.

11. Furnish copies of all communications between DCC and each supplier of subject components for the subject vehicles that pertain to the design, manufacture, performance, durability, quality, testing, or modification of the subject component in the subject vehicles or to its application for the instrument panel. This includes, but is not limited to, discussions regarding DCC's instrument panel engineering specifications and requirements, the specifications used by the supplier(s) in producing the subject components, any factors of safety incorporated into the engineering specifications and requirements, any procedures for installing and/ or assembling the subject component, and the manufacturing and quality control processes followed by the supplier(s) (and, if applicable, by DCC) as to the subject components. If any communications on this subject were oral or were conducted electronically, provide a written transcript or summary of each such communication, and include a statement that identifies the participants and the date of the communication.

A11. Copies of all communication between DCC and the supplier of the subject component for the subject vehicles that pertain to design, manufacture, performance, durability, quality, testing, or modification of the subject component in the subject vehicles or to its application for the instrument panel are being compiled and reviewed for applicability to this investigation. These documents will be provided upon completion of this exercise.

ATTACHMENT 11

12. State the number of each of the following that DCC has sold that may be used in the subject vehicles by component name, part number (both service and engineering/production), model and model year of the vehicle in which it is used and month/year of sale:

a. Subject component; and
b. Any kits that have been released, or developed, by DCC 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 of which DCC is aware that contain the subject component, whether installed in production or in service, and state the applicable dates of production or service usage.

A12 a. 2004 - 2005 MY Dodge Durango instrument cluster sales by calendar year:

2004 MY Dodge Durango				
Cluster Part Number	Parts sold in 2004 CY	Parts sold in 2005 CY	Parts sold in 2006 CY as of October 16	Total Parts Sold as of October 16, 2006
56049091AH	1144	1	5	1150
56049091AK	21	23	14	58
56049091AL	113	1144	2072	3329
56049092AK	18	7	1	26
56049093AK	2	7	0	9
2005 MY Dodge Durango				
56049691AH	0	570	19	589
56049691AI	0	797	1352	2109
56049692AI	0	319	441	760
56049693AI	0	7	2	9

Note: As discussed in response to question number 6, there are other random issues not related to the alleged condition that may still trigger replacement of the subject component.

2004-2005 MY HB instrument cluster part sales by month is provided in Enclosure 8, titled "PART SALES".

b. There have been no kits released, or developed, by DCC for use in service repairs to the subject component.

2004-2005 MY HB instrument cluster Supplier information:

Siemens / VDO
Tracy Choat
Manager - Hardware Engineering and NAFTA Strategic Planning
100 Electronics Boulevard
Huntsville, Alabama 35824
(256) 464-2236

The subject instrument cluster is also utilized in the 2006 MY HB, the 2005-2006 MY Dodge Dakota pickup truck (body model designation "ND") and the 2006 MY Mitsubishi Raider pickup truck (body model designation "NM").

13. Identify all other U.S. market vehicle models manufactured by DCC that use the subject component and provide separate responses to questions 1, 3, 4, 6 and 7 above with respect to each of these other DCC models.

Provide this information in Microsoft Access 2000, or a compatible format, entitled "NON-DURANGO VEHICLES."

A13. 2006 MY HB sport utility vehicles, 2005-2006 MY Dodge Dakota (ND) and 2006 MY Mitsubishi Raider (NM) pickup trucks also utilize the subject instrument cluster circuit board. The ND and NM pickup trucks by design have a lower interior lamp load than the HB sport utility vehicle.

DCC has identified no reports that relate to, or may relate to, the alleged condition (overheating, smoke, fire or melting, sparks or smoldering) for the subject component (instrument cluster circuit board) in the 2006 MY HB, 2005 -2006 MY ND or 2006 MY NM vehicles manufactured for sale or lease in the US. DCC has conducted a reasonable and diligent search of records kept in the ordinary course of business for such information.

1. There were 83,815 2006 MY HB, 199,034 2005-2006 MY ND and 9,953 2006 MY NM vehicles manufactured by DCC for sale or lease in the United States.

3. a. There are no customer complaints responsive to this inquiry.

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

c. There are no reports alleging crash or fatality responsive to this investigation. There are no reports alleging injury responsive to this investigation.

d. There are no reports involving a fire, based on claims against DCC involving a death or injury, or notices received by DCC alleging or proving that a death or injury was caused by the alleged condition in these vehicles.

e. There are no property damage claims responsive to this investigation. For purposes of this response, property damage is defined as any non-vehicle article that was allegedly damaged during the reported incident.

f. There are no third-party arbitration proceedings where DCC is, or was, a party to the arbitration, that are responsive to this investigation.

g. There are no lawsuits or legal claims involving DCC with allegations of overheating, smoke, or fire emanating from the instrument panel.

4. Not applicable.

6. The data in the following chart represents 2006 MY HB and 2005 - 2006 MY ND cluster replacement claims under warranty responsive to this inquiry. Warranty data for the 2006 MY NM (Mitsubishi Raider) is not readily available to DCC.

LOP code	2006 MY HB	2005-2006 MY ND
08451001	133	450

Note: There are other random issues not related to the alleged condition that may still trigger replacement of the subject component.

7. There are no LOP codes within the DCC warranty claim system that apply to any type of vehicle fire. The eight digit LOP code for cluster replacement is 08451001. There are no applicable problem codes or fault codes relating to this investigation, so by default the warranty system returns all claims that match the eight-digit LOP code.

The standard warranty offered on the 2006 MY HB, 2005 - 2006 MY ND, and 2006 MY NM was 36 months / 36,000 miles. DCC did not offer extended warranty coverage related specifically to the subject components.

14. State whether Dodge Durango models of the same production and/or model year are manufactured and sold for use outside of the United States. If the answer is yes, please provide the following information:

a. State whether Dodge Durango models manufactured for markets outside of the U.S. have experienced IP fires caused by the alleged defect or other causes, including the cracked capacitor issue that is the subject of Recall No. 03V-528.

b. Separately state the number of alleged fires reported to Chrysler due to the alleged defect or other causes. Regarding the latter, identify those causes and separately provide the number of fires due to each cause.

c. State the number of alleged IP fires by country and identified cause.

d. Identify and describe with particularity all steps, if any, DCC has taken to address these alleged incidents.

A14. 2004 - 2005 MY HB vehicles were manufactured for sale or lease outside the US. DCC is aware of one allegation of an instrument panel fire involving a 2004 MY HB (VIN 4F218908) in Riyadh, Saudi Arabia that may be related to this investigation. This fire is not related to the C293 capacitor because the vehicle built in June of 2004 and is outside the population of affected vehicles for recall C43, i.e., the C293 capacitor was removed from production in December of 2003 and does not exist on that cluster. The operator of the vehicle stated that there had been a malfunction with the interior lights prior to the alleged event, which may indicate issue with the Z107 integrated circuit, which controls vehicle interior lighting.

DCC is not aware of any other related allegations in the subject vehicles sold or leased outside the US market.

15. When did DCC first become aware that IP fires on the subject vehicles might be associated with Integrated Circuit No. Z107. List and describe with particularity what actions, if any, DCC has taken to address fires caused by this circuit?

A15. In June of 2006, DCC first began to suspect that integrated circuit Z107 may be associated with instrument cluster fires, following preliminary evaluation by the supplier of a number of returned instrument cluster circuit boards. The actions associated with this evaluation, and the potential involvement of Z107, are described in response to question number 9.

Although the association of Z107 with instrument panel fires in the subject vehicles was still unconfirmed, as a precautionary measure a change was made to the instrument cluster circuit board while this investigation continued. On 2007 MY HB vehicles, control of the interior lighting function was reassigned from the HS3 FET to the HS0 FET portions of the IC Z107, and the I_LIM bit was modified to limit in-rush current through the chip high side drivers. The HS0 FET has four times the current carrying capacity of the HS3 FET, and the HS0 was not utilized previously for the HB applications. On the 2007 MY ND and NM vehicles, the I_LIM bit was also modified to limit in-rush current. Reassignment of the interior lighting function control circuit was deemed to not be necessary on these pickup

trucks, since the interior lamp loads are approximately half when compared to the HB sport utility vehicle.

16. Furnish DCC'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 had indicating that either that the alleged defect was occurring or the subject component was malfunctioning; and**
- **f. The reports included with this inquiry.**

A16. DCC continues investigation of this complicated issue. Preliminary evaluation has indicated that the instrument cluster failures may originate from an integrated circuit used to control HB interior lighting functions. Analysis has also indicated that this integrated circuit, known as Z107, may be experiencing electrical overload stress (EOS). Investigation continues to better understand this suspected condition.

a. Although still preliminary, causal factors appear to be related to the in-rush current of the HB courtesy lamp circuit, the number of times the Z107 integrated circuit is subjected to this in-rush current, the current rating of the high side driver in the integrated circuit that was chosen to control the courtesy lamps, and the current limiting setting (I_LIM bit) in the chip.

b. A suggested failure mechanism is that excessive in-rush current can cause excess heat build up in the integrated circuit. Over time, this heat can damage the control die within the integrated circuit, which then does not allow proper control of the courtesy lamp circuit (turn it off or on as required) and may result in an inability for the integrated circuit to shut itself down if it experiences excessive temperature or current flow.

c. If the Z107 integrated circuit is damaged by the scenario above, the HB interior lights could malfunction, i.e., may not properly turn on or off with the door or instrument panel switches.

d. Risk posed to HB motor vehicle safety if the Z107 integrated circuit is damaged by the scenario above is a possible instrument cluster fire.

e. If the Z107 integrated circuit is damaged by the scenario above, the HB interior lights could malfunction, i.e., may not properly turn on or off with the door or instrument panel switches.

In summary, DCC continues investigation of this issue, and will provide NHTSA with periodic updates as additional information becomes available.

Certificate in Support of Request for Confidentiality

I, Stephan J. Speth pursuant to the provisions of 49 C.F.R. Part 512, state as follows:

(1) I am DaimlerChrysler Corporation's Director, Vehicle Certification, Compliance and Safety Affairs and I am authorized by DaimlerChrysler Corporation to execute documents on its behalf;

(2) I certify that the information contained in the attached documents is confidential and proprietary data and is being submitted with the claim that it is entitled to confidential treatment under 5 U.S.C. 552(b)(4);

(3) I hereby request that the information contained in the indicated documents be protected on a permanent basis;

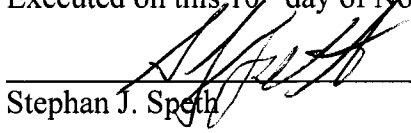
(4) This certification is based on the information provided by the responsible DaimlerChrysler Corporation personnel who have authority in the normal course of business to release the information for which a claim of confidentiality has been made to ascertain whether such information has ever been released outside DaimlerChrysler Corporation;

(5) Based upon that information, to the best of my knowledge, information and belief, the information for which DaimlerChrysler Corporation has claimed confidential treatment has never been released or become available outside DaimlerChrysler Corporation, except to certain contractors and suppliers under agreements to preserve the confidentiality of the information;

(6) I make no representations beyond those contained in this certificate and, in particular, I make no representations as to whether this information may become available outside DaimlerChrysler Corporation because of unauthorized or inadvertent disclosure (except as stated in paragraph 5); and

(7) I certify under penalty of perjury that the foregoing is true and correct.

Executed on this 10th day of November, 2006



Stephan J. Speth

Certificate in Support of Request for Confidentiality

I, Subramanyan Dakshinamoorthy, pursuant to the provisions of 49 C.F.R. Part 512, state as follows:

(1) I am Subramanyan Dakshinamoorthy, Vice President – Quality Assurance, Freescale Semiconductor, Inc. ("Freescale"), and I am authorized by Freescale to execute documents on its behalf;

(2) I certify that the information contained in the attached documents is confidential and proprietary data and is being submitted with the claim that it is entitled to confidential treatment under 5 U.S.C. 552(b)(4);

(3) I hereby request that the information contained in the indicated documents be protected on a permanent basis;

(4) This certification is based on the information provided by the responsible Freescale personnel who have authority in the normal course of business to release the information for which a claim of confidentiality has been made and to ascertain whether such information has ever been released outside Freescale;

(5) Based upon that information, to the best of my knowledge, information and belief, the information for which Freescale has claimed confidential treatment has never been released or become available outside Freescale, except to DaimlerChrysler Corporation and certain contractors of Freescale and/or DaimlerChrysler Corporation including but not limited to Siemens VDO Automotive Electronics Corporation and its affiliated entities, with the understanding that such information must be maintained in strict confidence;

(6) I make no representations beyond those contained in this certificate and, in particular, I make no representations as to whether this information may become available outside Freescale because of unauthorized or inadvertent disclosure (except as stated in paragraph 5); and

(7) I certify under penalty of perjury that the foregoing is true and correct.

Executed on this 10th day of November, 2006

Subramanyan Dakshinamoorthy
Vice President – Quality Assurance
Freescale Semiconductor, Inc.

CERTIFICATE IN SUPPORT OF REQUEST FOR CONFIDENTIALITY

I, Fredric E. Roth, Jr., pursuant to the provisions of 49 CFR Part 512, state as follows:

1. I am the Corporate Secretary for Siemens VDO Automotive Corporation ("Siemens VDO"), and I am authorized by Siemens VDO to execute documents of this nature on behalf of Siemens VDO.

2. Based upon the information available to me, it is my understanding that DaimlerChrysler Corporation is submitting fifteen (15) Siemens VDO documents in relation to NHTSA Engineering Analysis Number 06-015. The referenced documents contain Siemens VDO trade secrets and confidential and proprietary data, and are submitted with the claim that it is entitled to confidential treatment under 5 U.S.C., § 552(b)(4). These documents contain information and data related to Siemens VDO's processes of analysis, product testing methodologies, conclusions, and product design. Accordingly, the documents should be afforded confidential treatment on the ground that they constitute confidential business information, which if disclosed would likely cause substantial competitive harm to Siemens VDO. Disclosure of this information to competitors would reduce or eliminate the time and resources necessary for Siemens VDO competitors to bring competing products to the market.

3. I hereby request that the information contained in those documents be protected for a period of Ten (10) Years.

4. A member of my staff has inquired of the responsible Siemens VDO personnel who have authority in the normal course of business to release the type of information for which a claim of confidentiality has been made to ascertain whether such information has ever been released outside Siemens VDO.

5. Based upon such inquiries, to the best of my knowledge, information and belief, the information for which DaimlerChrysler Corporation and Siemens VDO have claimed confidential treatment has never been released or become available outside Siemens VDO except as hereinafter specified:

   - Portions of these documents may have been or may be shared with DaimlerChrysler Corporation and/or other customers or suppliers of Siemens VDO with the expectation that they will be kept confidential.

   - During the course of defending itself in litigation, Siemens VDO and/or DaimlerChrysler Corporation may have been, or may be required to produce such information.

6. I make no representations beyond those contained in this certificate and, in particular, I make no representations as to whether this information may become available outside Siemens VDO because of unauthorized or inadvertent disclosure, except as stated in Paragraph 5.

7. I certify under penalty of perjury that the foregoing is true and correct. Executed on this the 10th day of November 2006.

Fredric E. Roth, Jr.
Corporate Secretary