

DAIMLERCHRYSLER

Speth
8/9/07

August 3, 2007

DaimlerChrysler Corporation

Stephan J. Speth

Director
Vehicle Compliance & Safety Affairs

Ms. Kathleen C. DeMeter, Director
Office of Enforcement
Office of Defects Investigation
National Highway Traffic Safety Administration
U.S. Department of Transportation
1200 New Jersey Avenue SE
Washington, D.C. 20590

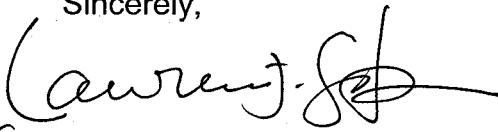
Dear Ms. DeMeter:

Reference: NVS-212mjl; EA06-020

On July 30, 2007, DaimlerChrysler Company LLC changed its name to Chrysler LLC (hereinafter referred to as "Chrysler"). This document contains Chrysler's analysis and response to the referenced peer vehicle inquiry regarding unexpected closing of the power liftgate. Chrysler is not waiving its claim to attorney work product and attorney-client privileged communications by providing the information and conclusions contained herein.

Chrysler has received only a small number of potentially responsive reports and/or allegations out of a subject population of 436,710 MY 2004 through 2006 Dodge Caravan and Grand Caravan, and Chrysler Town and Country vehicles. These events appear to be random and isolated, and, in some cases, possibly the result of prior accident damage or modification.

Sincerely,


for Stephan J. Speth

Attachment and Enclosures

RECEIVED
NVS-210
2007 AUG -7 A 11:00
OFFICE OF DEFECTS
INVESTIGATION

- Q1 State, by model and model year, the total number of subject peer 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. Make;**
 - b. Model;**
 - c. Model Year;**
 - d. Vehicle identification number (VIN);**
 - e. Date of manufacture;**
 - f. Date warranty coverage commenced; and**
 - i. The State in the United States where the vehicle was originally sold or lease (or delivered for sale or lease).**

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

- A1. On July 30, 2007, DaimlerChrysler Company LLC changed its name to Chrysler LLC (hereinafter referred to as "Chrysler"). During the 2004 through 2006 model years, Chrysler manufactured 436,710 Dodge Caravan and Grand Caravan, and Chrysler Town and Country vehicles (Chrysler body code designation "RS") for sale or lease in the United States and equipped with a power liftgate.**

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

NOTE: UNLESS OTHERWISE INDICATED IN THE RESPONSE TO ANY OF THE QUESTIONS, THIS DOCUMENT CONTAINS INFORMATION THROUGH JUNE 28, 2007, THE DATE THE INFORMATION REQUEST WAS RECEIVED.

- Q2. 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 subject condition in the subject peer vehicles, by model and model year:**
- 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 peer vehicle, property damage claims, consumer complaints, or field reports;**
- d. Property damage claims;**
 - 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).

A2. The following summarizes the non-privileged reports identified by Chrysler that relate to, or may relate to, the alleged condition in the subject peer vehicles. Chrysler has conducted a reasonable and diligent search of its normal repositories of complaint information to the following criteria:

- Alleged failure or malfunction of subject component, including complaints of loose or binding liftgate struts and their attachments; or
- Unexpected closing of the power liftgate as a result of a described or potential failure or malfunction of subject component, including those described as an improper opening or inability to remain open

See Table below for breakdown of VIN by report type. Each box within the shaded area represents the number of unique VINs with the corresponding report type associated with it. For example, the cell in the table that lies in the CAIR column and the Legal row indicates that one VIN had both a CAIR report and a Legal claim that may be related to the alleged condition.

Totaling a single row across the columns yields the total number of that type of report. The number of unique VINs is established by summing the total of cells within the shaded area. In total, there are 19 complaints affecting 18 unique peer vehicles as indicated in the shaded area of the table above.

	CAIR	FIELD	LEGAL	DUPLICATES	TOTALS
CAIR	4	0	1	0	5
FIELD	0	13	0	0	13
LEGAL	1	0	0	0	1
				total	19

- a) There are a total of five customer complaints deemed potentially responsive. Only one has an associated record of a part replacement of the subject component.
- b) There are a total of thirteen field reports that may relate to the alleged condition of which eight have an associated record of a part replacement of the subject component.
- c) There are no reports involving a crash or fatality that are responsive to this inquiry.

There are two reported incidents alleging minor injury described as cuts and bruises. For one of these incidents there is both a customer complaint and legal claim reported. An examination of the vehicle by both the servicing dealer and a special investigator found extensive damage to the rear end of the vehicle as a result of a previous accident that may have contributed to the incident. The other incident involves a vehicle in which the customer reported modifying the attachment of the "shocks on the hatch" himself.

- d) There are no claims to this inquiry alleging property damage.
- e) There are no third-party arbitration proceedings involving Chrysler that are responsive to this inquiry.
- f) There is one legal claim against Chrysler responsive to this inquiry which is already reported in part c) of this question. There are no lawsuits, pending or closed, involving Chrysler that are responsive to this inquiry.

- 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 make, model and model year;**
 - f. Vehicle's mileage at time of incident;**
 - g. Incident date;**
 - h. Report or claim date;**
 - i. Whether property damage is alleged;**
 - j. Number of alleged injuries, if any;**
 - k. Number of alleged fatalities, if any.**

Provide the table 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 k. is provided in Enclosure 2 as a Microsoft Excel table, entitled "REQUEST NUMBER TWO DATA".**

- Q4. 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 subject condition in the subject peer 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."

- A4. There have been 1121 warranty claims, including extended warranty coverages and claims for goodwill services, associated with the specified labor operation codes that may be responsive to this investigation.

The detailed response that lists the warranty claim details, as requested in items a. through k. is provided in Enclosure 3 as a Microsoft Access table, titled "WARRANTY DATA".

- Q5. Describe in detail the search criteria used by DaimlerChrysler to identify the claims identified in response to Request No. 4, 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 subject condition in the subject peer vehicles. State, by make and model year, the terms of the new vehicle warranty coverage offered by DaimlerChrysler on the subject peer 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 DaimlerChrysler offered for the subject peer vehicles and state by option, model, and model year, the number of vehicles that are covered under each such extended warranty.**

- A5. The search criteria used by Chrysler to identify claims to Request No. 4 can be found in the chart below:

DESCRIPTION OF REPAIR	LABOR OPERATION
PROP, LIFTGATE / DECKLID – Replace - Right	23-40-29-02
PROP, LIFTGATE / DECKLID – Replace - Left	23-40-29-03
BRACKET / STRUT, POWER LIFTGATE TRANSVERSE - Replace	23-40-46-05

FAILURE CODE	DESCRIPTION
06	Bent
07	Binds, sticks, seized
11	Broken or cracked
20	Collapsed
27	Damaged
51	Improperly installed
65	Leaks
3R	High/low operating effort
6X	Weak
FC	Fastener broken or cracked
FD	Fastener missing
FG	Fastener loose / improperly installed
UC	Uncodeable
	Blank (no code)

The subject peer vehicles are covered by a 3-year or 36,000 miles Basic Limited Warranty, excluding normal maintenance and wear items. Additionally, Chrysler dealers often perform repairs at no charge to the customer on out-of-warranty vehicles as a goodwill gesture.

There were three basic extended service contracts available for purchase on 2004 through 2006 model year RS vehicles; Powertrain Care Coverage, Added Care Coverage, and Maximum Care Coverage. Deviations of these plans were offered with varying terms of duration and deductible.

The detailed response that lists the extended warranty coverage as requested is provided in Enclosure 3 as a Microsoft Excel table, titled "EXTENDED WARRANTY COVERAGE".

Q6. Describe the design and operation of the power liftgate feature in the subject peer vehicles including any built-in safety and failsafe features.

A6. For 2004 through 2006 model year Dodge Caravan, Dodge Grand Caravan, and Chrysler Town and Country vehicles, the power liftgate system was available as optional equipment. This system allows the liftgate to be opened or closed automatically using the liftgate button on the keyless entry transmitter or by pressing the liftgate button located on

the overhead console. The power liftgate may also be opened or closed manually by depressing the liftgate release switch located on the underside of the license plate bar and pulling the liftgate open with one fluid motion.

The power liftgate has built-in safety features including:

- When the remote keyless entry transmitter button is pressed and the "Lamp Flash" feature is enabled, the tail lights will flash to signal that the liftgate is opening or closing.
- An automatic reversing feature – if anything obstructs the power liftgate and provides sufficient resistance while it is closing or opening, the liftgate will automatically reverse to the closed or open position.
- Pinch sensors – attached to the side of the liftgate opening that detect light pressure anywhere along these strips causing the liftgate to return to the open position.
- If the liftgate release button is activated while the power liftgate is closing, the liftgate will reverse to the full open position.
- The power liftgate buttons will not operate if the vehicle is in gear or neutral and the vehicle speed is above 0 mph (0 km/h).
- If the power liftgate encounters multiple obstructions within the same cycle, the system will automatically stop and must be opened or closed manually.
- For the 2005 and 2006 model year subject vehicles, the power liftgate system recognizes if the two gas props cannot support the liftgate after it has reached full open position during a power operation. If the liftgate starts to come down without a command to do so, the drive mechanism will engage, raising the gate to the full open position, then return the gate in a controlled manner to a closed position.

There are also tips in the owner's manual for safe operation of the power liftgate system. These include:

- The power liftgate will not operate in temperatures below – 12°F (– 24°C) or temperatures above 143°F (62°C).
- Be sure to remove any build-up of snow or ice from the liftgate before pressing any of the power liftgate buttons.
- Gas props support the liftgate in the open position. However, because the gas pressure drops with temperature, it may be necessary to assist the props when opening the liftgate in cold weather.