

# DAIMLERCHRYSLER

*Speth*  
4/16/06

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

April 13, 2006

Mr. Thomas Z. Cooper, Chief  
Vehicle Integrity Division  
Office of Defects Investigation  
National Highway Traffic Safety Administration  
US Department of Transportation  
400 Seventh St. SW  
Washington, D.C. 20590

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Dear Mr. Cooper:

Ref: NVS-212cag; PE06-008

This document contains DaimlerChrysler Corporation's ("DCC's") response to the referenced inquiry regarding alleged fires originating under the driver's seat in 2001 through 2003 model year Dodge Durango vehicles that have been manufactured for sale or lease in the United States. By providing the information contained herein, DCC is not waiving its claim to attorney work product and attorney-client privileged communications.

DCC's investigation has uncovered no design or manufacturing defect that may lead to the relatively few incidents of reported fires in the subject vehicles. In fact, there is evidence based on vehicles previously inspected in the field that careless handling of fluids, aftermarket devices or other causes unrelated to vehicle design may have lead to these few events. In no event were there any reported injuries, fatalities or significant property damage. Accordingly, DCC believes there is no unreasonable risk to motor vehicle safety and this investigation should be closed.

Sincerely,



Stephan J. Speth

Attachment 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. **Make;**
  - c. **Model;**
  - d. **Model Year;**
  - e. **Date of manufacture;**
  - f. **Date warranty coverage commenced; and**
  - g. **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, all data contained within this response is through March 1, 2006, date of the information request.**

- A1. **The chart below lists the 2001 through 2003 model year ("MY") Dodge Durango sport utility vehicles that have been manufactured by DaimlerChrysler Corporation ("DCC") for sale or lease in the United States.**

| Model Year             | 2001    | 2002    | 2003    |
|------------------------|---------|---------|---------|
| Volume                 | 137,536 | 112,409 | 122,264 |
| Total Volume = 372,209 |         |         |         |

The specific data requested in items a. through g. is provided in Enclosure 1 as a Microsoft Access 2000 table, titled "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 "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. The following summarizes the non-privileged reports identified by DCC that relate to, or may relate to, the alleged condition ("a fire may start under the front seat") for the subject components ("the driver's side manual seat assembly, including but not limited to any wiring harness located under or near the driver's side seat") in the subject vehicles ("all MY 2001-2003 Dodge Durango sport utility vehicles manufactured for sale or lease in the United States"). 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 eight customer complaints for six unique VINs that may relate to the alleged condition. These customer complaints are also referred to as a Customer Assistance Inquiry Requests ("CAIRs").
  - b. There are a total of three field reports for three unique VINs that may relate to the alleged condition, based on the limited text contained within the reports and no associated photographs.
  - c. There are no reports alleging a crash, injury or fatality that are 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 a possible defect in a subject vehicle.

- e. There are no claims alleging property damage responsive to this investigation, i.e., where a customer alleged property damage and for which reimbursement was sought. DCC noted, however, two instances of minor property damage (aftermarket radio and compact disc) that were neither mentioned by the customer nor for which reimbursement was sought.
- 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 five legal claims and no lawsuits involving DCC with allegation of vehicle interior fire which may be responsive to this investigation.

|         | Customer Complaints | Field Reports | Claims/Lawsuits | Unique VINs |
|---------|---------------------|---------------|-----------------|-------------|
| 2001 MY | 3                   | 1             | 3/0             | 4           |
| 2002 MY | 5                   | 2             | 2/0             | 5           |
| 2003 MY | 0                   | 0             | 0/0             | 0           |

Total Unique VINs that may be Related to Alleged Condition = 9

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 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 2000, or a compatible format, entitled "REQUEST NUMBER TWO DATA"

- A3. The information requested in items a. through m. is provided in Enclosure 2 as part of a Microsoft Access 2000 table titled "REQUEST NUMBER TWO 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. Copies of all documents within the scope of Question No. 2 are provided in Enclosure 3, titled "CUSTOMER COMPLAINTS, FIELD REPORTS, LEGAL CLAIMS and LAWSUITS."
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."**

- A5. There are no labor operation codes within the DCC warranty claim system that apply to any type of vehicle fire. Accordingly, there is no warranty data responsive to this request.

Reports of alleged fire events 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.

- 6. Describe in detail the search criteria used by DCC to identify the claims identified 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. 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.**
- A6. There are no applicable search criteria that relate to the alleged condition (see response to Question 5). The standard warranty offered on all 2001 through 2003 MY Dodge Durango vehicles was 36 months / 36,000 miles. There was no extended warranty coverage option related to the subject components on these vehicles. 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 not included in this response.
- 7. 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.**
- A7. DCC has issued no service, warranty, or other documents that relate to, or may relate to, the alleged defect in the subject vehicles. DCC has no plans to issue any service, warranty, or other documents or communications that relate to, or may relate to, the alleged defect in the subject vehicles in the next 120 days.
- 8. Describe all assessments, analyses, tests, test results, studies, surveys, simulations, investigations, inquiries and/or evaluations (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. Additionally,**

**provide any actions that DCC has taken regarding the VOQ's submitted with this letter. 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.**

- A8. DCC evaluated a 2001 MY Dodge Durango exemplar vehicle on March 6, 2006 to assess the seating as well as wiring located under or near the driver's side manual seat. Photographs from this evaluation are included in Enclosure B. There were no manufacturing or design defects discovered in this assessment. No additional assessments are planned at this time.**

**The VOQs provided by the agency with the information request were evaluated for applicability to the alleged condition and compared to existing data within the DCC system. No additional contact was made with any of the vehicle owners as a result of this investigation.**

- 9. 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. In addition, describe all modifications or changes to any and all vehicle systems or components other than the subject components which relate to, or may relate to, the alleged defect in the subject vehicles. 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.**

- A9. DCC made no changes in the design, material composition, manufacture, quality control, supply or installation of the subject components that relate to, or may relate to, the alleged condition in the subject vehicles. The subject vehicle seat assembly has no wiring attached to it. Per conversation between my staff and NHTSA investigator Cynthia Glass on April 10, 2006, it was agreed that available DCC Change Notice (CN) main body harness cover sheets would be acceptable in response to the request. These are included as Enclosure 9. The DCC CN system converted to an electronic format in 2001 and change notices written prior are no longer available.

**10. Produce one of each of the following:**

- a. Installation procedure for the subject component;**
- b. Exemplar drawings of each design version of the subject component; and**
- c. Exemplar drawings of the seat wiring harness and all other wiring harnesses located under the driver's seat.**

- A10. a. Installation procedure for the subject vehicle seat assembly are contained in Enclosure 10a. Also included in Enclosure 10a are photographs from the exemplar vehicle of the body wiring harness along with the power seat take out. This take out is not utilized in vehicles with manual, i.e., non-powered, seats and in those applications the take out is taped to the main body harness and resides under the carpet and insulating pad. Remnants of the tear tape are visible in the above mentioned photographs.
- b. Body wiring harness drawings are being submitted as Enclosure 10b, under separate cover with a request for confidential treatment, to the NHTSA Office of the Chief Counsel. Per a phone conversation between my staff and NHTSA Investigator Cynthia Glass on April 10, 2006, it was agreed that subject vehicle seat assembly drawings would not be provided since there are no electrical components included with the seat assembly.
- c. There is no separate seat wiring harness. Photographs of the power seat take out from the main body harness are included in Enclosure 10a and drawings included with 10b.

- 11. 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 (including the cut-off date for sales, if applicable):**

- 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 identical component, whether installed in production or in service, and state the applicable dates of production or service usage.**

- A11. a. The part sales information is included in Enclosure 11. It is impossible to determine what these part sales are utilized for. There are other customer issues, e.g., customer damage, accident repair, etc., that are not related to the alleged condition, yet still trigger sales and replacement of the subject components. DCC has concluded that part sales cannot be used to determine any trend related to the alleged condition.
- b. There have been no kits released or developed by DCC for use in service repairs to the subject component which relate, or may relate, to the alleged condition in the subject vehicles.

The subject component seat supplier and contact information is:

Lear Corporation  
Doug Sweeting  
2998 Waterview Drive  
Rochester Hills, MI 48309  
Tel. 248-371-8400

The subject component wiring harness supplier and contact information is:

Yazaki North America, Inc.  
Farzin Baghai  
6801 Haggerty Road 32 W  
Canton, MI 48187  
Tel. 734-963-1000

There are no other DCC vehicles that utilize the identical subject components.

**12. 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 effect(s) of the failure on the subject components and/or systems in the vehicle;**
- e. The risk to motor vehicle safety that it poses;**
- f. What warnings, if any, the operator and the other persons both inside and outside the vehicle would have that the alleged defect was occurring or subject component was malfunctioning;**
- g. A description of the analysis process used to assess "a" through "f;" and**
- h. The reports generated as a result of this inquiry.**

A12. Experience has shown there are a number of potential causes for vehicle interior fires, including among other things: 1) careless handling of smoking materials by vehicle occupants; 2) careless transportation and handling of liquids or flammable materials within the interior of the vehicle; 3) aftermarket devices that are improperly installed or exceed electrical load limitations; and 4) defectively manufactured or designed interior electrical components.

DCC did not discover any evidence of defectively designed or manufactured components in the exemplar vehicle evaluated on March 6, 2006 (see response to Question 8) or other vehicles previously inspected in the field.

DCC does not believe that any of the alleged incidents were the result of an open powered connection exposed to foot well wash, as indicated in VOQ #10131908, and as suggested by ODI during a January 23, 2006 telephone conversation with DCC. Foot well wash is the slurry that forms in the winter months, consisting of water and road salt, which can accumulate in the lowest portion of the floor pan below the driver's feet. No reports were found where a powered electrical connector was exposed to foot well wash. In fact, by design, there are no powered electrical connectors in close proximity to the foot wells in the subject vehicle.

With the exemplar vehicle evaluated on March 6, 2006, DCC examined two connectors that are located beneath the front seat to determine if it is possible that these connectors could be exposed to foot well wash. DCC has concluded that there is no reasonable risk of contamination by foot well wash for the following reasons:

- a. The power seat connector, which is unused in a manual seat vehicle, is taped to the main body harness and is actually slightly behind the middle of the driver's seating area. This connector is located under the carpet and pad when it is not used. It is behind the cross car structural beam, 4 inches above and 6 inches behind the foot well area. A photograph of this connector and its location in vehicle is included in Enclosure 10a.
- b. The center console power outlet connector is unused in a bench seat configuration. It is mounted firmly to the top of the cross car beam. The console connector is located slightly left of the center seating position and is 8 inches above and 4 inches behind and

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**ATTACHMENT**

to the right of the foot well wash area. A photograph of this connector and its location in vehicle is included in Enclosure 10a.

These two connectors are present in all subject vehicles and are located in an area with no reasonable risk or potential of foot well wash contamination.

DCC's investigation has uncovered no design or manufacturing defect in any way that may lead to the relatively few incidents of reported fires in the subject vehicles. In fact, there is evidence based on vehicles previously inspected in the field that careless handling of fluids, aftermarket devices or other causes unrelated to vehicle design may have lead to these few events. In no event were there any reported injuries, fatalities or significant property damage. Accordingly, DCC believes there is no unreasonable risk to motor vehicle safety and this investigation should be closed.