

DAIMLERCHRYSLER

April 21, 2006

Mr. Jeffrey L. Quandt, Chief
Vehicle Control Division
Office of Defects Investigation
National Highway Traffic Safety Administration
U.S. Department of Transportation
400 Seventh Street, S.W.
Washington, DC 20590

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

Reference: NVS-213swmc; PE06-009

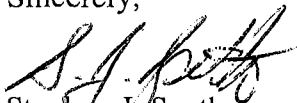
Dear Mr. Quandt:

This document contains DaimlerChrysler's Corporation's (DCC) response to the referenced inquiry dated March 2, 2006 regarding information concerning the fuel tank assembly for the 2004-2006 model year Chrysler Pacifica ("CS") vehicles and peer vehicles requested. In reaching our 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.

According to NHTSA, DCC's level of input was higher than other manufacturers who responded to the PE05-050 peer inquiry. DCC, however, believes that its actual occurrence rate is consistent with the industry. DCC submitted a greater number of field reports because it maintained a part restriction program that created inputs for all fuel tank replacements, not typically submitted or tracked by the manufacturer. Of the data collected only a small portion specifically alleges a fuel tank puncture from road debris while the majority of the data alleges fuel tank damage without specifically noting a puncture.

The Chrysler Pacifica meets or exceeds all requirements outlined in FMVSS 301. DCC is not aware of any reports involving crash, injury, fire, property damage or fatality related to the subject vehicle fuel tank damage from road debris. DCC contends that the subject component poses no unreasonable risk to motor vehicle safety.

Sincerely,


Stephan J. Speth

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1. State, by model and model year, the number of subject vehicles and peer DaimlerChrysler has manufactured for sale or lease in the United States. Separately, for each subject vehicle manufactured to date by DaimlerChrysler, 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 this information in Microsoft Access 2003, or a compatible format, entitled "PE06-009 DAIMLERCHRYSLER PRODUCTION DATA." See Enclosure 1, Data Collection Disc, for a pre-formatted table which provides further details regarding this submission.

Note: Unless otherwise indicated in the question response, all data contained in this response is through March 1, 2006.

- A1 The following chart shows the production volumes for the subject vehicle, Chrysler Pacifica ("CS"). During the 2004, 2005 and 2006 model years, DaimlerChrysler Corporation ("DCC") manufactured 279,100 vehicles for sale or lease in the United States.

CS Subject Vehicle Production Volumes

Model Year (MY)	Make / Model	U.S. Market Volume
2004	Chrysler / Pacifica	98,583
2005	Chrysler / Pacifica	118,564
2006	Chrysler / Pacifica	61,953
Total Volume: 279,100		

The following are the production for the Peer Vehicles requested.

RS Production Volumes

Model Year (MY)	Make / Model	U.S. Market Volume
2004	Dodge Caravan and Grand Caravan Chrysler Town & Country ("RS")	143,684
2005	RS	622,820
2006	RS	285,959
Total Volume: 1,052,463		

PT Production Volumes

Model Year (MY)	Make / Model	U.S. Market Volume
2004	Chrysler PT Cruiser ("PT")	104,731
2005	PT	133,627
2006	PT	94,120
Total Volume: 332,478		

LX Production Volumes (LX launched as a 2005 vehicle)

Model Year (MY)	Make / Model	U.S. Market Volume
2004	NA	NA
2005	Chrysler 300 and 300C Dodge Magnum and Charger ("LX")	238,466
2006	LX	311,691
Total Volume: 550,157		

LH Production Volumes (2004 was last year of LH production)

Model Year (MY)	Make / Model	U.S. Market Volume
2004	Chrysler 300M and Concorde, Dodge Intrepid ("LH")	111,031
Total Volume: 111,031		

HB Production Volumes

Model Year (MY)	Make / Model	U.S. Market Volume
2004	Dodge Durango ("HB")	129,967
2005	HB	114,642
2006	HB	69,454
Total Volume: 314,063		

The detailed response that lists the production data for each of the subject and peer vehicles is provided in Enclosure 01 as a Microsoft Access 2000 file, titled, "Production Data".

2. 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 alleged defect in the subject and peer 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 DaimlerChrysler is or was a party to the arbitration; and
- g. 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).

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 "f" through "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 received by DCC that relate to, or may relate to, the alleged condition in the subject vehicles. DCC has conducted a reasonable search of records kept in the ordinary course of business for such information.

There are a total of 19 customer complaints (15 unique VINs) that allege fuel tank puncture or damage from road debris for the subject vehicle, CS Pacifica.

CS Customer Complaints

Criteria	'04 MY	'05 MY	'06 MY	Total	Unique VINs
Alleged Puncture / Damage from Road Debris	9	5	0	14	10
Fuel Tank Damage Cause / Extent Unknown	2	3	0	5	5
Total Complaint Count	11	8	0	19	15

The following charts contain customer complaint information related to the peer vehicles.

RS Customer Complaints

Criteria	'04 MY	'05 MY	'06 MY	Total	Unique VINs
Alleged Puncture / Damage from Road Debris	4	2	0	6	6
Fuel Tank Damage Cause / Extent Unknown	1	5	0	6	6
Total Complaint Count	5	7	0	12	12

PT Customer Complaints

Criteria	'04 MY	'05 MY	'06 MY	Total	Unique VINs
Alleged Puncture / Damage from Road Debris	0	0	0	0	0
Fuel Tank Damage Cause / Extent Unknown	0	1	0	1	1
Total Complaint Count	0	1	0	1	1

LX Customer Complaints

Criteria	'04 MY	'05 MY	'06 MY	Total	Unique VINs
Alleged Puncture / Damage from Road Debris	NA	10	3	13	13
Fuel Tank Damage Cause / Extent Unknown	NA	7	2	9	6
Total Complaint Count	0	17	5	22	19

LH Customer Complaints (only 2004 MY reported, 04 was the last year for LH production)

Criteria	'04 MY	'05 MY	'06 MY	Total	Unique VINs
Alleged Puncture / Damage from Road Debris	0	NA	NA	0	0
Fuel Tank Damage Cause / Extent Unknown	0	NA	NA	0	0
Total Complaint Count	0	NA	NA	0	0

HB Customer Complaints

Criteria	'04 MY	'05 MY	'06 MY	Total	Unique VINs
Alleged Puncture / Damage from Road Debris	1	0	0	1	1
Fuel Tank Damage Cause / Extent Unknown	0	2	0	2	2
Total Complaint Count	1	2	0	3	3

- b. There are a total of 133 field reports (130 unique VINs) that allege fuel tank puncture or damage from road debris in the subject vehicle.

CS Field Reports

Criteria	'04 MY	'05 MY	'06 MY	Total	Unique VINs
Alleged Puncture / Damage from Road Debris	16	1	0	17	17
Fuel Tank Damage Cause / Extent Unknown	81	35	0	116	113

The following charts contain field report information related to the peer vehicles.

RS Field Reports

Criteria	'04 MY	'05 MY	'06 MY	Total	Unique VINs
Alleged Puncture / Damage from Road Debris	0	1	0	1	1
Fuel Tank Damage Cause / Extent Unknown	0	23	0	23	22

PT Field Reports

Criteria	'04 MY	'05 MY	'06 MY	Total	Unique VINs
Alleged Puncture / Damage from Road Debris	0	0	0	0	0
Fuel Tank Damage Cause / Extent Unknown	0	0	0	0	0

LX Field Reports

Criteria	'04 MY	'05 MY	'06 MY	Total	Unique VINs
Alleged Puncture / Damage from Road Debris	NA	17	8	25	22
Fuel Tank Damage Cause / Extent Unknown	NA	376	88	464	373

LH Field Reports (only 2004 MY reported, 04 was the last year for LH production)

Criteria	'04 MY	'05 MY	'06 MY	Total	Unique VINs
Alleged Puncture / Damage from Road Debris	0	NA	NA	0	0
Fuel Tank Damage Cause / Extent Unknown	0	NA	NA	0	0

HB Field Reports

Criteria	'04 MY	'05 MY	'06 MY	Total	Unique VINs
Alleged Puncture / Damage from Road Debris	0	0	0	0	0
Fuel Tank Damage Cause / Extent Unknown	0	33	0	33	28

- c. There are no reports involving crash, injury or fatalities for the subject or peer vehicles that are responsive to this inquiry.
- d. There are no reports involving fires for the subject or peer vehicles that are responsive to this inquiry.

- e. There are no claims involving property damage for the subject or peer vehicles that are responsive to this inquiry.
 - f. There are no third party arbitration proceedings, where DCC is or was a party to the arbitration, responsive to this inquiry.
 - g. There are no lawsuits, either pending or closed, against DCC, or notices received by DCC 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. 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 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". 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 No. 2 is provided in Enclosure 03 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. Copies of all documents within the scope of Request No. 2 are provided in Enclosure 04, titled "CAIR & Field Reports".
- 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 the subject component (for all trouble codes) in the subject and 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. 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 2003, 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.

Provide DCC's assessment of the number of such claims that: (1) are related to the alleged defect; (2) are not related to the alleged defect; and (3) have insufficient information to determine if they are related to the alleged defect. For the second category, provide claim counts for each of the conditions requiring fuel tank replacement for each model of subject and peer vehicle sorted in descending order of claim counts.

- A5. The following are charts illustrating the warranty claims for the subject and peer vehicles. The charts also illustrate DCC's assessment of the claims, whether 1) related to alleged defect, 2) not related to alleged defect and 3) insufficient information to determine if related to alleged condition.

CS Subject Vehicle Warranty

Model Year	Related Claims	Non-Related Claims / Tanks Replaced	Insufficient Information	Total Claims
2004 - 2006	1	145 / 17	217	363

RS Peer Vehicle Warranty

Model Year	Related Claims	Non-Related Claims / Tanks Replaced	Insufficient Information	Total Claims
2004 - 2006	0	132 / 35	740	872

PT Peer Vehicle Warranty

Model Year	Related Claims	Non-Related Claims / Tanks Replaced	Insufficient Information	Total Claims
2004 - 2006	0	42 / 0	205	247

LX Peer Vehicle Warranty

Model Year	Related Claims	Non-Related Claims / Tanks Replaced	Insufficient Information	Total Claims
2005 - 2006	0	121 / 59	259	380

LH Peer Vehicle Warranty

Model Year	Related Claims	Non-Related Claims / Tanks Replaced	Insufficient Information	Total Claims
2004	0	54 / 0	623	677

HB Peer Vehicle Warranty

Model Year	Related Claims	Non-Related Claims / Tanks Replaced	Insufficient Information	Total Claims
2004 - 2006	0	225 / 0	615	840

6. 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.

- A6. There have been no service, warranty, and/or other documents that relate to, or may relate to the alleged condition in the subject peer vehicles that DCC has issued to any dealers, regional or zone offices, field offices, fleet purchasers or other entities. DCC has no plans to issue any such documents in the next 120 days.

7. 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. 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;
 - 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.

Title	Start Date	End Date	Objective of the Action	Lead Responsible	Summary
Annual Validation Drop Testing - 2003	2/28/2003	6/7/2003	Tank filled w/ethylene glycol & chilled to -40F dropped from 6m. No leaks as result of drop.	Inergy Automotive	Pass, no leaks.
Annual Validation Drop Testing - 2004	3/15/2004	5/4/2004	Tank filled w/ethylene glycol & chilled to -40F dropped from 6m. No leaks as result of drop.	Inergy Automotive	Pass, no leaks.
Annual Validation Drop Testing - 2005	12/8/2005	12/8/2005	Tank filled w/ethylene glycol & chilled to -40F dropped from 6m. No leaks as result of drop.	Inergy Automotive	Pass, no leaks.
Tank Shield	3/2/2006	current	Investigate feasibility of supplemental tank shield	DCX	Objective still under investigation
Competitive Fuel Tanks	4/12/2006	4/20/2006	Proto document competitive vehicle fuel tanks	DCX	See photo's

8. Describe all modifications or changes made by, or on behalf of, DCC in the design (including shielding), 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. 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.

A8 There have been no modifications or changes to the CS fuel tank that would affect the strength of the fuel tank made by or on behalf of DCC. This would include fuel tank assemblies, from the beginning of production of the 2004 CS Pacifica model year.

While it does not affect fuel tank strength, a change to the EVOH (Ethyl Vinyl Alcohol) layer was made on August 20, 2004 reducing the average wall thickness by 0.01mm. There are no additional changes planned for the next 120 days.

9. State the number of fuel tanks that DCC has sold that may be used in the subject and peer 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).

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.

A9. The following chart illustrates the fuel tank service and production sales volume information related to the subject and peer vehicles. The Mopar service part number includes the fuel tank and heat shield, where as, the production part number includes the fuel tank assembly. The total service part sales volume is provided in the chart below, and the detailed monthly history of the service part sales volume is provided in Enclosure 09, titled "Monthly Service Part Sales Volume".

Subject and Peer Fuel Tank Total Sales

Model	Model Year	Component Name	Mopar Service Part Number	Mopar Service Sales	Production Part Number
CS	2004-2006	Fuel Tank	05101802AB	660	04880201AG
PT	2004-2006	Fuel Tank	05278543AC	1495	05278918AI 05278934AC 05273557AC 05273789AA 05278874AH 05278935AD 05273551AC 05273787AA
RS	2004-2006 w/o Stow-N-Go	Fuel Tank	04809638AC	1192	04809904AD 04877030AD 04877031AC
RS	2005-2006 w/ Stow-N-Go	Fuel Tank	04809739AG	796	04881700AL 04721546AB
LX	2004-2006	Fuel Tank	V6 05135173AB	741	04581400AK 05290710AE 04581476AK 04578263AC
			V8 05135172AB	527	
LH	2004	Fuel Tank	05080752AA	949	04581341AF
HB	2004	Fuel Tank	05135567AB	296	052113919AF
	2005-2006	Fuel Tank	05140388AC	624	052102831AB 052855498AA

The following chart illustrates the fuel tank supplier information for the subject and peer vehicles.

Subject and Peer Supplier Information

Model	Model Year	Part Number		Supplier Name Address / Contact	Supplier Contact Phone Number
CS	2004 - 2006	04809617AD (shell only) 04880201AG (tank assembly)		Inergy Automotive 2710 Bellingham Troy, MI 48083	Scott Dawson 248-743-5842
PT	2004	<u>Gas</u> 05278918AI 05278934AC	<u>Turbo</u> 05278874AH 05278935AD	Kautex – Textron 750 Stephenson Hwy. Troy, MI 48083	Tony Dahm 248-616-5272 Michael Hess 248-616-5286
	2005	05273557AC	05273551AC		
	2006	05273789AA	05273787AA		
RS	2004	<u>w/o Stow-N-Go</u> 04809904AD	N/A	Inergy Automotive 2710 Bellingham Troy, MI 48083	Ed Furmanczyk 248-743-5779
	2005	04877030AD 04877031AC	<u>Stow-N-Go</u> 04881700AK		
	2006	04877030AD 04877031AC	04881700AL 04721546AB		
LX	2004 - 2006	04581400AK (Gas / 19 gal) 05290710AE (Gas 19 gal / SRT8) 04581476AK (Gas 18 gal) 04578263AC (Diesel / 19 gal)		Inergy Automotive 2710 Bellingham Troy, MI 48083	Stefan Salonen 248-743-5860
LH	2004	04581341AF		Inergy Automotive 2710 Bellingham Troy, MI 48083	Todd Morrey 248-743-5815
HB	2004	52113919AF		Inergy Automotive 2710 Bellingham Troy, MI 48083	Joe Savone 248-743-5793 Mark Schaeffer 248-743-5811
	2005	52102831AB			
	2006	52855498AA			

10. With regards to the parts restriction program placed on the fuel tanks for the subject vehicles DCC should furnish the following information:

- a. The starting and ending date of the program,
- b. Why the program was initiated,
- c. Why in March of 2005 information regarding the location of the damage was required,
- d. To whom the information was given, and
- e. Any similar parts restriction programs for fuel tanks in any other DCC vehicle line during the same time period.

A10

- a. The part restriction program began on the subject vehicle in January 2003 and stopped June 2005. The parts restriction program was re-initiated in February 2006 and concluded March 2006.
- b. The goal of a part restriction program is to gather early production vehicle feedback relative to design and quality. Part restriction forces the dealer service parts processor to call the Service

Technical Assistance Resource Center (STAR) for approval prior to placing an order for a replacement fuel tank for any reason. In an effort to gather information for PE06-009, DCC re-initiated the retention program to acquire fuel tanks for inspection.

- c. In March 2005, CS fuel tank supplier Inergy Automotive observed a trend of increased part requests and requested the specific damage location be noted as a means to potentially gather additional insight.
 - d. The information from the Service Technical Assistance Resource (STAR) Center was collated by Inergy Automotive, supplier of the subject component and shared with the DCC's subject Vehicle Engineering team. The same information was provided pursuant to the PE05-050 peer inquiry response.
 - e. A similar part restriction program for the same period was in place for LX and the HB.
- 11. State whether DCC ever considered shielding in the design of the fuel tank in the subject vehicles during product development or at any time since. Provide copies of all documents related to this subject. Provide a list showing fuel tank shielding usage in all MY 2004 through 2006 light vehicles produced by DCC. For each model in which shielding is used provide a brief description of the location and type of shielding and the rationale for its use.**

The CS fuel tank has never contained shielding nor was shielding part of the original design plan. Pursuant to PE05-050 and this response DCC initiated a supplemental tank shielding feasibility study for the subject vehicle. Copies of this feasibility/packaging study are contained in "Enclosure 11 – Feasibility."

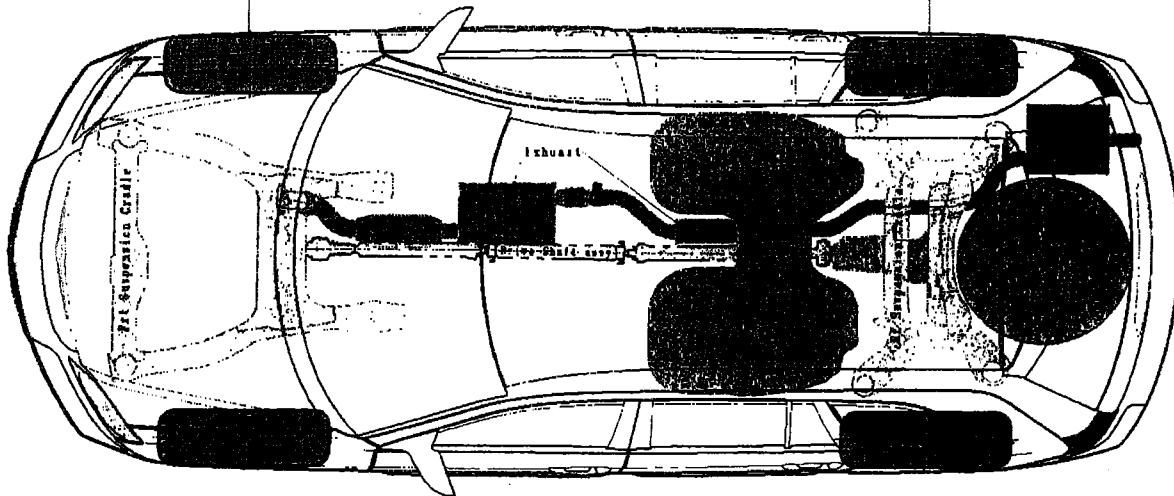
Model Year	Make	Model	Vehicle Code	Location	Type of Shielding	Vehicle Content	Rationale for Use
2004 - 2006	Jeep	Liberty	KJ	Cradles tank	Metal Skidplate	Optional	Off road option
2004 - 2006	Jeep	Wrangler	TJ	Cradles tank	Metal Skidplate	Optional	Off road option
2004	Jeep	Grand Cherokee	WJ	Cradles tank	Metal Brush Guard/ Skid Plate	Std/Opt	Protect for departure angle
2005 - 2006	Jeep	Grand Cherokee	WK	Cradles tank	Metal Brush Guard/ Skid Plate	Std/Opt	Comply with impact requirements
2004 - 2006	Dodge	Durango	HB	Cradles tank	Metal Skidplate	Optional	Off road option
2004	Dodge	Dakota PU	AN	Cradles tank	Metal Skidplate	Optional	Off road option
2005 - 2006	Dodge	Dakota PU	ND	Cradles tank	Metal Skidplate	Optional	Off road option
2004 - 2006	Dodge	Ram 1500 PU	DR	Cradles tank	Metal Skidplate	Optional	Off road option

12. Provide photographs of the undercarriage of each of the subject and peer vehicles.

Below are undercarriage views of the subject and peer vehicles with the exhaust, front suspension cradle, and fuel tank included. Per agreement with NHTSA investigator Stephen McHenry, underbody graphics would be provided instead of photographs.

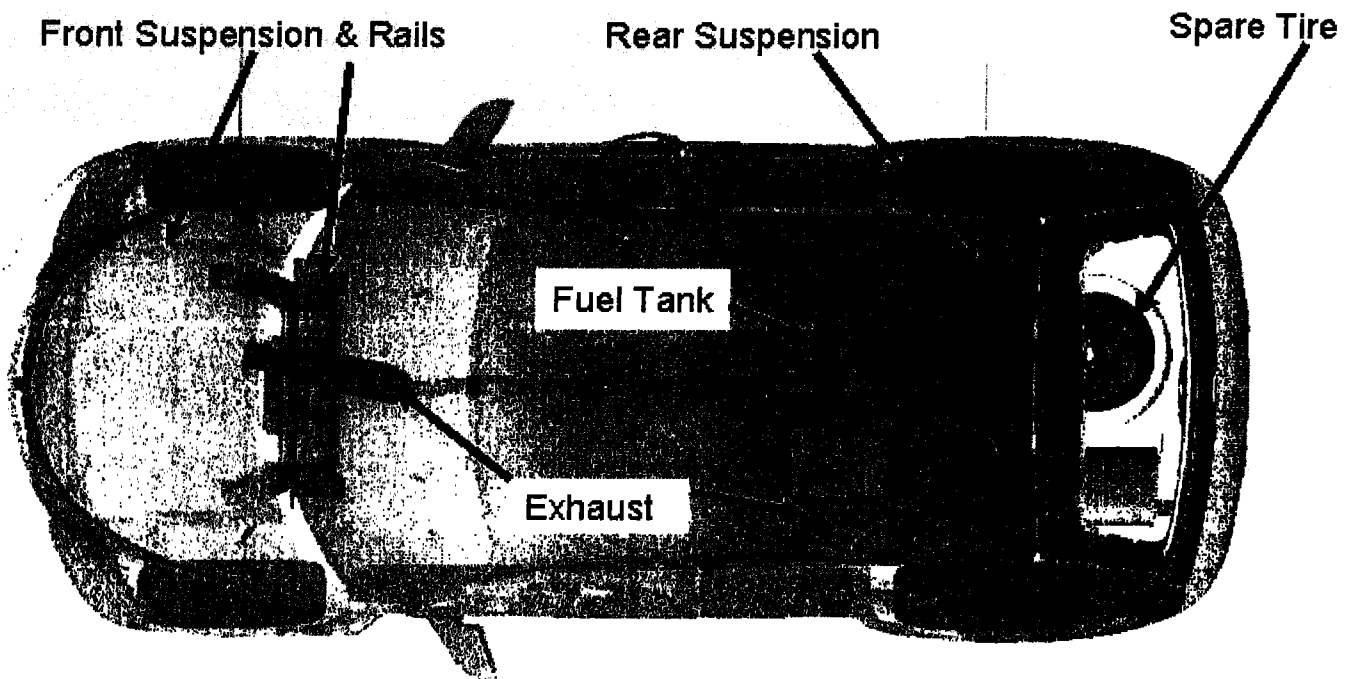
The subject vehicle is shown first, followed by the peer vehicles. These views were provided by different engineering groups depending on platform responsibility, therefore the views are not all alike; however, the requested information is provided on each.

CS Pacifica Underbody View

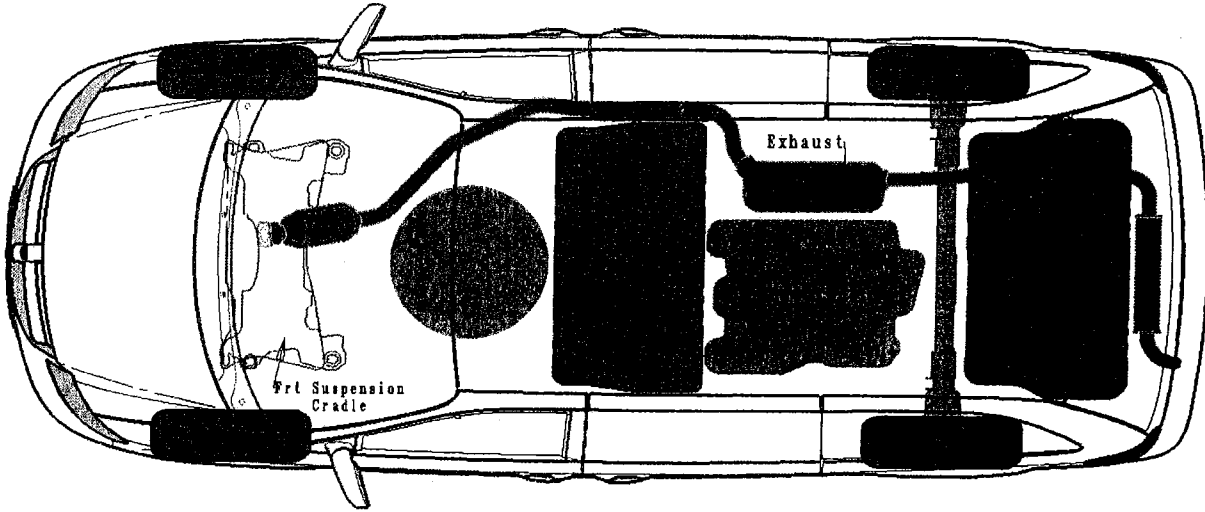


The following are views of the peer vehicles requested, PT Cruiser, RS (Dodge Caravan, and Chrysler Town & Country Sto-N-Go), RS (Dodge Caravan and Chrysler Town & Country), LX (Dodge Magnum), LH (Chrysler 300M) and HB (Durango).

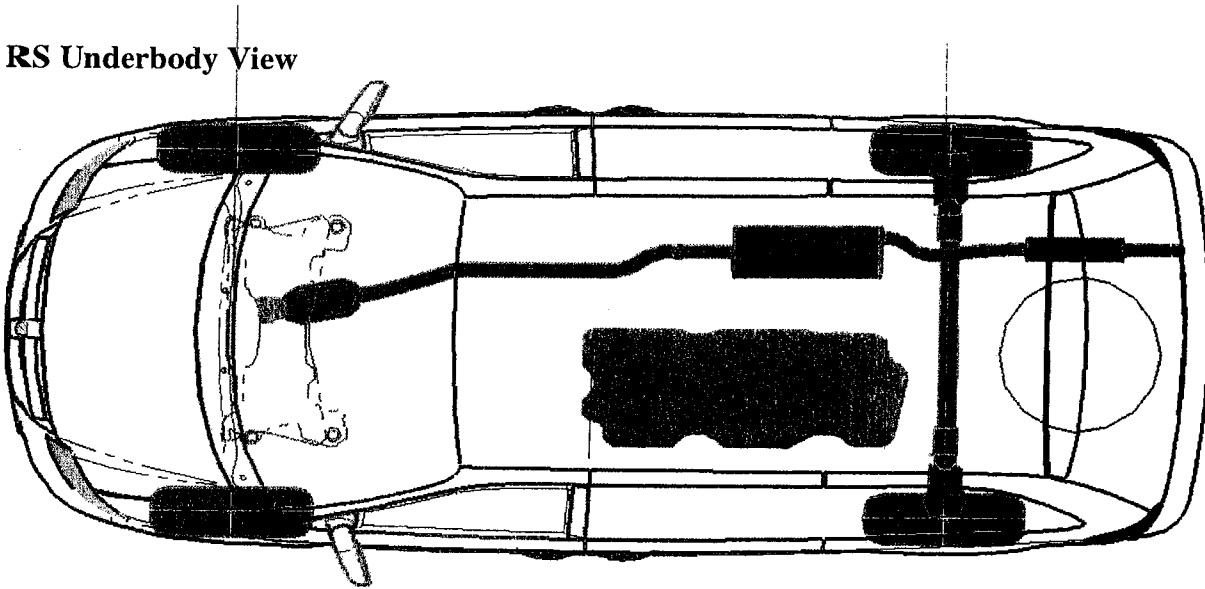
PT Underbody View



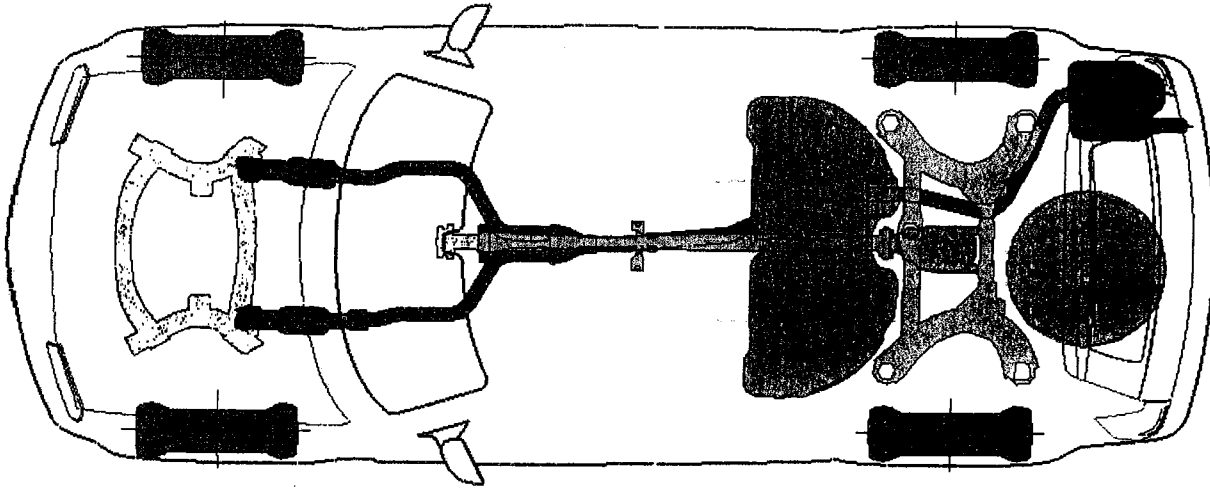
RS Stow-N-Go Underbody View



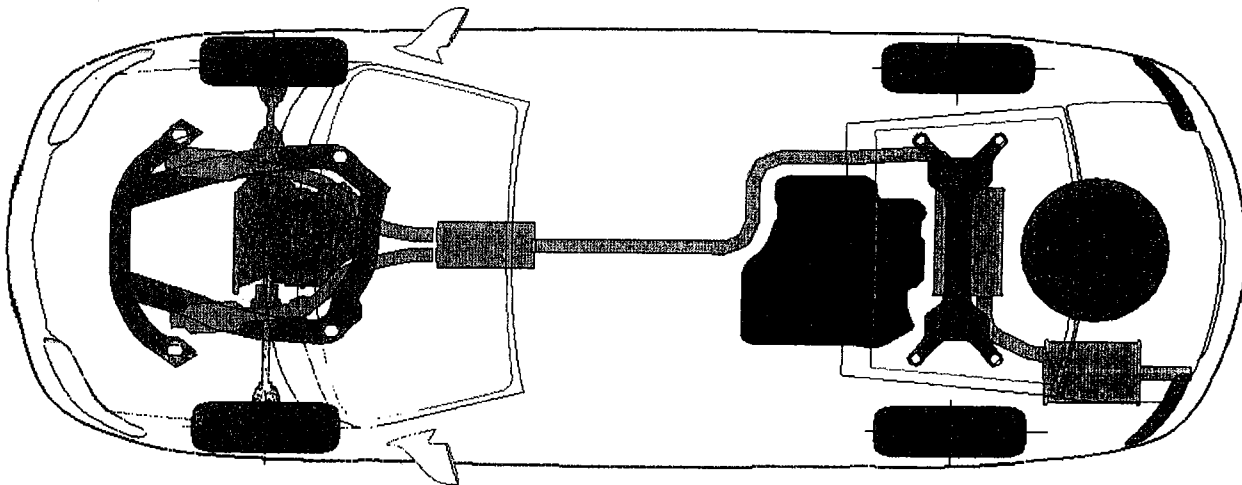
RS Underbody View



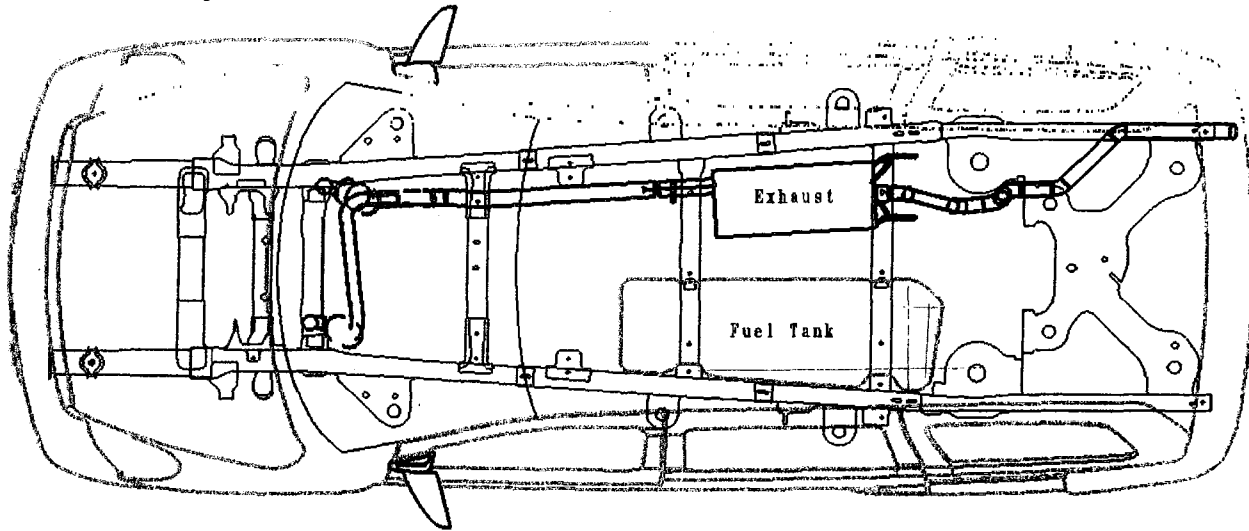
LX Underbody View



LH Underbody View



HB Underbody View



13. **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. **The reports included with this inquiry.**

The subject vehicle meets or exceeds all requirements outlined in FMVSS 301. Anticipation of the 2007MY phase-in implementation of 50MPH rear impact per FMVSS 301 prompted manufacturers to package fuel tanks forward of the rear axle to comply with the enhanced regulation. Individual vehicle functional objectives dictate whether mid ship fuel tank configuration is saddle or suitcase style. Both styles are common industry configurations. DCC routinely performs industry benchmarking to peer vehicles in an effort to gain trend insight and evaluate competitiveness.

During recent benchmarking of fuel tanks, DCC noted a number of vehicles that utilized HDPE plastic saddle fuel tanks including the Cadillac SRX/CTS/STS, Mazda RX-8, Ford Freestyle and Volvo V70/XC70. None of these competitive vehicles utilize shielding. Additionally, DCC noted among others the Honda Odyssey, GMC Envoy, Buick Rendezvous and Ford Expedition utilize suitcase style HDPE plastic fuel tanks without shielding. It is common to package a plastic fuel tank mid ship without shielding.

DCC does not believe the distance from the tank to ground plane is a dominant factor in resistance to puncture from road debris. Resistance to puncture is a function of tank wall strength and construction. The tank construction of the subject vehicle is industry standard multi-layer HDPE similar to that utilized on the benchmarked vehicles referenced above.

According to NHTSA, DCC's level of input was higher than other manufacturers who responded to the PE05-050 peer inquiry. DCC, however, believes that its actual occurrence rate is consistent with the industry. DCC submitted a greater number of field reports because it maintained a part restriction program that created inputs for all fuel tank replacements, not typically submitted or tracked by the manufacturer, through its Service Technical Assistance Resource (STAR) Center. In peer response PE05-050, DCC identified 121 potentially related field reports relative to tank damage from road debris for the subject vehicle. Of these, there were only 2 non-STAR inputs.

The DCC dealership network can call STAR for technical direction relative to repairs. The goal of a part restriction program is to gather early feedback relative to design and quality. Part block via STAR prevents unnecessary part replacements by requiring the dealer service parts processor to call the STAR center for approval prior to placing an order for a replacement fuel tank. This process creates a field report even if a warranty claim is not made. Due to the part restriction and the nature of the alleged defect, DCC's level of input would be significantly higher than other manufacturers that do not have a similar part restriction and reporting process. For example, a given vehicle owner may file a comprehensive claim against their automotive insurance carrier, similar to windshield damage caused by road debris. Without a part restriction program in place, these claims would not be reported to the manufacturer and not reported as a warranty claim or field report.

Consistent with DCC's response to question 2, the PT Cruiser did not have a part restriction program in place and had no field reports responsive to this inquiry.

In the PE06-009 opening resume summary, NHTSA concluded that all 121 reports were instances of fuel tank puncture from road debris. However, based upon analysis/review of these reports, DCC has identified only 8 allegations of puncture. The remaining 113 allege tank damage without specifically noting a puncture. Since peer response PE05-050, 14 additional inputs have been received, of which only 1 specifically notes a tank puncture.

Accordingly, DCC contends that the subject component poses no unreasonable risk to motor vehicle safety.