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DaimlerChrysler Corporation

Stephan J. Speth
Director
Vehicle Compliance & Safety Affairs

June 9, 2006

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

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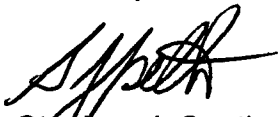
Dear Mr. Quandt:

Reference: NVS-213dsy, PE06-015

This document contains DaimlerChrysler Corporation's ("DCC") abbreviated response to the referenced inquiry regarding alleged failure of the clutch linkage system on some 2006 model year Jeep Wrangler vehicles. This abbreviated response is per agreement during a phone conversation between DCC Vehicle Safety Office and ODI on April 26, 2006. 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.

Based on this response and information provided in the Regulation 573 Defect Report provided to the Agency on May 2, 2006, DCC believes the investigation should be closed.

Sincerely,


Stephan J. Speth

Attachment and Enclosures

cc: Kathleen DeMeter

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. **Date of manufacture;**
 - c. **Date warranty coverage commenced;**
 - d. **Transmission model or type; and**
 - e. **The State in the United States where the vehicle was originally sold or leased (or delivered for sale or lease).**

Provide the table in Microsoft Access 2000, or a compatible format, entitled "PRODUCTION DATA." See Enclosure 1, PE06-015 IR Attachments, 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 April 20, 2006.

This abbreviated response is per agreement during a phone conversation between DCC Vehicle Safety Office, Scott Yon and Jeff Quandt on April 26, 2006.

Affected vehicles are defined in the Regulation 573 Defect Report submitted on May 2, 2006 related to DCC recall F22. An internal investigation had determined that in November, 2005 a revised clutch master cylinder linkage rod was implemented in production. The previous linkage rod design was put back into production in early February, 2006.

- A1) The production data for the subject vehicle, all 2006 Jeep Wranglers with the NSG370, six speed manual transmission is provided in Enclosure 01, as a Microsoft Access 2000 file, titled, "Production Data". There are two files-"PRODUCTION DATA PE 06-015 Affected Population" and -"PRODUCTION DATA PE 06-015 Unaffected Population". The unaffected population is those subject vehicles outside the scope of the recall action. During the 2006 model year, DaimlerChrysler Corporation ("DCC") manufactured 6,876 affected vehicles for sale or lease in the United States.
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. **Property damage claims;**
- e. **Third-party arbitration proceedings where DCC is or was a party to the arbitration;**
and
- f. **Lawsuits, both pending and closed, in which DCC 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 "f," 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 "e" and "f," 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.

The following summarizes the reports of events identified by DCC that relate to, or may relate to, the alleged condition. DCC has conducted a reasonable and diligent search of the normal repositories of such information. The definitions of affected and unaffected vehicles are provided in the response to Question 1.

A2a) There are 17 Customer complaints, involving 14 unique VINs, that relate or may relate to the subject condition in the affected vehicles.

A2b) There are 3 field reports, involving 2 unique VINs, that relate or may relate to the subject condition in the affected vehicles.

A2c) There are 0 reports that allege a crash, injury or fatality that relate or may relate to the subject condition in the affected vehicles.

A2d) There are 0 property damage claims that relate or may relate to the subject condition in the affected vehicles.

A2e) There are 0 third party arbitration claims that relate or may relate to the subject condition in the affected vehicles.

A2f) There are 0 lawsuits that relate or may relate to the subject condition in the affected vehicles.

There are 0 inputs as described in A2a through A2f that relate or may relate to the subject condition in the unaffected vehicles.

- 3. Separately, for each item (complaint, report, claim, notice, or matter) within the scope of your response to Request No. 2, state the following information:**
- a. DCC's file number or other identifier used;
 - b. The category of the item, as identified in Request No. 2 (i.e., consumer complaint, field report, etc.);
 - c. Vehicle owner or fleet name (and fleet contact person), address, and telephone number;
 - d. Vehicle's VIN;
 - e. Vehicle's make, model and model year;
 - f. Vehicle's mileage at time of incident;
 - g. Incident date;
 - h. Report or claim date;
 - i. Whether a crash is alleged;
 - j. Whether property damage is alleged;
 - k. Number of alleged injuries, if any; and
 - l. Number of alleged fatalities, if any.

Provide this information in Microsoft Access 2000, or a compatible format, entitled "COMPLAINT DATA." See Enclosure 1, PE06-015 IR Attachments, for a pre-formatted table that 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 "COMPLAINT DATA PE 06-015".

- 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 "Consumer Complaints & 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, or may relate to, the subject component in the subject vehicles: warranty claims; extended warranty claims; claims for good will services that were provided; field, zone, or similar adjustments and reimbursements; and warranty claims or repairs made in accordance with a procedure specified in a technical service bulletin or customer satisfaction campaign.**

Separately, for each such claim, state the following information:

- a. DCC's claim number;
- b. Vehicle owner or fleet name (and fleet contact person) and telephone number;

- c. VIN;
- d. Repair date;
- e. Vehicle mileage at time of repair;
- f. Repairing dealer's or facility's name, telephone number, city and state or ZIP code;
- g. Labor operation number;
- h. Problem code;
- i. Replacement part number(s) and description(s);
- j. Concern stated by customer; and
- k. Comment, if any, by dealer/technician relating to claim and/or repair.

Provide this information in Microsoft Access 2000, or a compatible format, entitled "WARRANTY DATA." See Enclosure 1, PE06-015 IR Attachments, for a pre-formatted table that provides further details regarding this submission.

- A5) The detailed response that lists the warranty claim information is provided in Enclosure 05 as a Microsoft Access 2000 compatible format, titled "Warranty Data". There are two files titled "WARRANTY DATA PE 06-015 Affected Population" and "WARRANTY DATA PE 06-015 Unaffected Population". The definitions of affected and unaffected populations are provided in the response to Question 1.

There are a total of 46 claims involving 44 unique VINs that have been paid by DCC to date that relate to, or may relate to, the subject condition in the affected population.

There are three claims that have been paid by DCC to date that involve the clutch master cylinder assembly in the unaffected population that meet the criteria defined in A6. Analysis of these claims determined that they are not related to the clutch master cylinder linkage rod.

- 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) The search criteria used by DCC to identify claims in response to Request No. 5 can be found in the charts below.

Repair Description	Labor Operation
Clutch Master Cylinder Assembly	06-60-25

Failure Codes for Labor Operation	Description
11	Broken or Cracked
27	Damaged
UC	Uncodable

The standard warranty offered by DCC on all 2006 model year Jeep Wrangler vehicles is 36 months / 36,000 miles. There is no extended warranty coverage option related specifically to the subject vehicles. Owners may have purchased additional warranty coverage through DCC or third-party providers not affiliated with DCC. Third-party warranty data is not available to DCC and is not included with this response.