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DaimlerChrysler Corporation

Stephan J. Speth

Director

Vehicle Compliance & Safety Affairs

February 2, 2007

Mr. Thomas Cooper
Vehicle Integrity Division
Office of Defects Investigation
National Highway Traffic Safety Administration
U.S. Department of Transportation
400 Seventh Street, SW
Washington, D.C. 20590

Dear Mr. Cooper:

Reference: NVS-212cag; PE06-056

This document contains DaimlerChrysler Corporation's ("DCC's") partial response to the referenced inquiry regarding passenger compartment fires in 2006 model year Jeep Liberty vehicles. This partial response is per agreement on January 24, 2007 between members of our respective staffs. By providing the information contained herein, DCC is not waiving its claim to attorney work product and attorney-client privileged communications.

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."

- A1. The chart below lists the 2006 model year ("MY") Jeep Liberty sport utility vehicles (body model designation "KJ") that have been manufactured by DaimlerChrysler Corporation ("DCC") for sale or lease in the United States.

Model Year	2006
Volume	147,243

The specific data requested in items a. through g. is provided in Enclosure 1 as a Microsoft Access 2000 table, titled "PRODUCTION DATA".

NOTE: UNLESS OTHERWISE INDICATED IN THE RESPONSE, THIS DOCUMENT CONTAINS INFORMATION FROM FEBRUARY 15, 2005 (START OF PILOT PRODUCTION FOR 2006 MY JEEP LIBERTY) THROUGH DECEMBER 11, 2006 (DATE OF RECEIPT OF THE INFORMATION REQUEST FOR PE 06-056).

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 ("any passenger compartment fire") in the subject vehicles ("all MY 2006 Jeep Liberty 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 twelve customer complaints for twelve 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 no field reports that may relate to the alleged condition.
 - c. There are two reports alleging an injury, and no reports of crashes or fatalities that are responsive to this investigation.
 - d. There are two 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 five claims alleging property damage responsive to this investigation, i.e., where a customer alleged property damage and 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 twelve legal claims and no lawsuits involving DCC with allegation of vehicle interior fire which may be responsive to this investigation.

MY	Customer Complaints	Field Reports	Claims / Lawsuits
2006	12	0	12/0
Total unique VINs that may be related to the alleged condition = 12			

- 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 "COMPLAINT 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. The data within Enclosure 3 is organized in the following manner: Contained within the enclosure are two folders named "Customer Complaints" and "Legal Claims". The Customer Complaints 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 a list of summaries using the claimant's last name to identify the claim. Each summary contains the CAIR number for cross reference to the Customer Complaint files.

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."

- 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 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."

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

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 a component.

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.

There were no repairs made to any vehicles as a result of a technical service bulletin or a customer satisfaction notification.

- 7. 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.**

- A7. A word search of relevant systems was used to determine the total number of reports that may pertain to the alleged defect. The search criteria included the words "fire" and "interior." The warranty system was not searched because fires are not repaired under warranty and no labor operation numbers (LOPS) or failure codes exist for a fire.

The standard warranty offered on all 2006 MY Jeep Liberty vehicles was 36 months / 36,000 miles. There was no extended warranty coverage option related to the subject components on these vehicles. Owners may also have purchased additional coverage through third-party service contract providers. DCC has no access to these records.

- 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. DCC has issued no service, warranty, or other documents that relate to, or may relate to, the alleged defect in the subject vehicles.

11. Describe the path of cooled air and condensate for the HVAC system, including identifying potential sources for leakage of moisture and exposure of electronic components, wiring, and connectors to moisture.

A11. The path of cooled air and condensate for the HVAC system is described in a document contained in Enclosure 11.

13. Provide an electrical schematic drawing for the HVAC system including both the passenger and the engine compartment.

A13. All electrical schematics of the HVAC system and associated power distribution are provided in Enclosure 13.

14. 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. Blower motor,
- b. Blower motor resistor,
- c. Blower motor relay, and
- d. Any kits that have been released, or developed, by DCC for use in service repairs to the above.

For each component part number, provide the supplier's name, address, and appropriate point of contact (name, title, and telephone number).

A14. Sales charts for the blower motor and the blower motor resistor are contained in Enclosure 14. The blower motor relay sales have not been included because it is a common "iso" type relay that is used throughout the vehicle. It has no specific application to the HVAC or the blower motor and therefore would not be representative of any concerns with the HVAC system. There were no kits developed or released for servicing the HVAC assembly.

Mr. Thomas Z. Cooper
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Attachment

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The supplier of the HVAC assembly for the subject vehicle is:

Valeo, Inc.
4100 N. Atlantic Blvd.
Auburn Hills, MI 48326
Phone: 248-209-8253