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April 4, 2008

Ms. Kathleen C. DeMeter, Director
U.S. Department of Transportation
1200 New Jersey Avenue, SE
West Building, Fourth Floor
Washington, D.C. 20590

Dear Ms. DeMeter:

Reference: NVS-213cla; EA 07-007

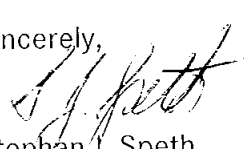
This document contains Chrysler LLC's ("Chrysler") supplemental response to the referenced inquiry. By providing the information contained herein, Chrysler is not waiving its claim to attorney work product and attorney-client privileged communications. Pursuant to a March 25, 2008 telephone conversation with Jeff Quandt and his team at NHTSA ODI, Chrysler is submitting additional information and further analysis of data provided in response to EA07-007.

Chrysler agrees with ODI's position that complaint data alleging engine stall while driving for the subject vehicles is grouped into two separate populations. Chrysler's detailed analysis of all reports alleging engine stall while driving in early built 2006 model year 4.7L equipped Jeep Commanders strengthens its belief that further action is not warranted. The vast majority of the reported stalling events occurred at low (or presumed low) speeds, and there is no demonstrable evidence that these stalls are creating an unreasonable risk of death, injury or property damage.

TSB 18-049-07 (Cal 16 PCM software) has also had a positive effect on minimizing low speed stalling conditions in the pre January 10, 2006 build population of subject vehicles, with 190 vehicles receiving the TSB to date. In addition, all subject vehicles are covered by Chrysler's 8 year / 80,000 mile emission system component warranty, which covers and corrects free of charge any issue identified with the PCM or application of the specified TSB.

Chrysler maintains that in the case of a stall, the operator would have the ability to steer and that the brakes would operate normally for at least one application of the brake pedal before additional force would be needed to operate brakes without assist. Complaint data analysis has indicated that in almost all cases the operator was immediately able to restart the vehicle. Accordingly, Chrysler believes there is no unreasonable risk to motor vehicle safety and this investigation should be closed.

Sincerely,



Stephan J. Speth

Attachment and Enclosures

Pursuant to a March 25, 2008 telephone conversation with Jeff Quandt and his team at NHTSA ODI, Chrysler is submitting additional information and further analysis of data previously provided in response to EA07-007.

1) Complaint Data

Chrysler is in agreement with ODI's position presented during the above referenced telephone conversation that complaint data alleging engine stall while driving for the EA07-007 subject vehicle population of 2006-2007 model year Jeep Commanders appears to be grouped into two distinct populations.

Analysis of this data has shown that a low level of input alleging engine stall while driving exists for all available engine configurations (3.7L, 4.7L, and 5.7L) in the subject vehicles across both model years. Chrysler has not identified a single universal causal factor responsible for this low level of input, and in nearly all instances, evaluations by trained service technicians were unable to duplicate the condition nor was any fault code present or evidence of a problem with the vehicle. Chrysler believes that this low level of input is due to a number of random and isolated events that are not indicative of any specific defect with these vehicles.

Complaint data alleging engine stall while driving specific to 4.7L engine equipped Commanders built early during the 2006 model year clearly define a separate population. Although the level of complaint data appears higher in this portion of the subject vehicle population, for the reasons identified below Chrysler believes this condition presents no unreasonable risk to motor vehicle safety.

In the January 4, 2008 EA07-007 response, Chrysler identified a change (referred to as "Cal 16") to the 2006 model year Commander 4.7L Powertrain Control Module (PCM) software implemented into production on January 10, 2006. Complaint data alleging engine stalling while driving with 4.7L equipped Commanders shows a significant decrease following this PCM software change. There were 26,791 2006 model year 4.7L engine equipped Commanders built prior to the implementation of Cal 16.

Chrysler believes that the alleged stalling events in the early 2006 model year 4.7L equipped Commanders may be attributed, at least in part, to a vapor purge corruption / engine idle strategy (also identified in the January 4, 2008 EA07-007 response). This condition would only occur while the vehicle is operating at idle or during low speed driving, e.g., deceleration to a stop, coasting or parking lot maneuvers when steering system load is highest. An associated engine stall is unlikely to occur at highway or steady state higher speed driving because the rotating components of the engine would contain sufficient inertia to maintain engine operation.

The early built 2006 model year 4.7L equipped Commanders contained PCM software with low engine idle strategy with the intent to increase fuel economy. It was determined that this low

engine idle strategy was susceptible to an idle undershoot condition during the vapor purge corruption condition noted above.

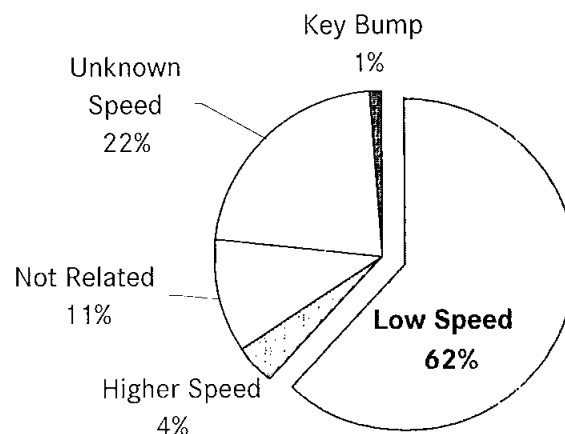
Chrysler also believes that many reports of stalling can be attributed to a number of other conditions unrelated to the vehicle design or manufacturing, such as contaminated fuel, engine damage and poor or lack of vehicle maintenance. These conditions are often difficult to diagnose, particularly if there is no opportunity to fully inspect the vehicle. As the ODI is aware, many of the vehicles with reports of stalling were not subjected to such an inspection.

2) Further Analysis of Alleged Stalling Events

Further analysis of alleged stalling events, and classification by type, in the 2006 model year 4.7L equipped Commanders with the pre Cal 16 PCM software are included in the charts below. This analysis consisted of a detailed review of all available information from the customer narrative regarding the incident in question, and reveals that the majority of alleged stalling events occurred at low speeds. Additionally, many of these low speed events occurred while the engine was simply at engine idle speed and/or while the vehicle was stopped.

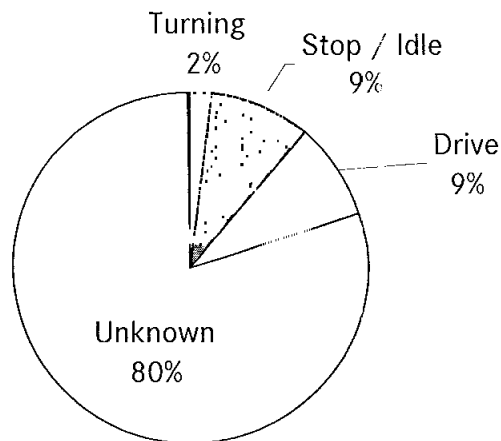
Only 4% of the reports involved higher speed stalling events, i.e., events where the customer made specific mention of highway, freeway or interstate driving associated with the event, or reported actual speeds of 40 MPH or greater. This analysis also determined, as noted below, that 22% of the relevant customer reports were unable to be categorized with a speed because no indication was given or could be inferred from the complaint data. Absent additional information, when a customer makes no mention of the associated speed, it is assumed the speed was most likely low and the vehicle was not being operated in a situation where a stalling event would have placed an unreasonable risk of safety on the customer.

2006 MY Commander 4.7L pre-Cal 16 Complaint Speed Analysis



Detailed analysis of the low speed events, comprising 62% of the total events, is noted in the chart below:

2006 MY Commander 4.7L pre-Cal 16 Low Speed Input Events



This analysis thus reveals two significant points:

- 1) The vast majority of these events occurred at low, or presumed low, speeds. Only 4% of the total input made specific mention of higher speed during the alleged event.
- 2) Of the low speed events, only 2% were alleged to have occurred during a turning maneuver. Steering load would be highest during such parking lot maneuvers.

Complaint data analysis showed that in almost all cases the operator was immediately able to restart the vehicle.

3) Technical Service Bulletin

As a result of the analysis above, and as noted in the January 4, 2008 EA07-007 response, Chrysler released Technical Service Bulletin (TSB) 18-049-07 to the field in December of 2007. This TSB provides the Cal 16 PCM software for service update, and the corresponding drop in warranty data and field input verify its effectiveness. To date, this TSB has been applied to 190 vehicles, in addition to Chrysler's vehicle test fleet of repurchased subject vehicles, with improved engine idle strategy to address the possibility of the vapor purge corruption condition. The same TSB also addresses a low speed, momentary Electronic Stability Program (ESP) activation for all 3.7L equipped subject vehicles.

It should also be noted that all subject vehicles are covered by Chrysler's 8 year / 80,000 mile emission system component warranty, which covers and corrects free of charge any issue identified with the PCM or application of the specified TSB.

4) Vehicle Test Fleet Analysis and Update

Chrysler has been able to confirm the effectiveness of the Cal 16 PCM software TSB using its test fleet of repurchased vehicles. As previously discussed, Chrysler assembled a test fleet of repurchased Commanders alleged by the customer to have had engine stall occurrence(s) while driving and has been accumulating mileage on these vehicles.

Included in this fleet are seven 4.7L equipped 2006 model year Commanders built prior to the production PCM software implementation of Cal 16 on January 10, 2006. These vehicles were not modified in any way beyond addition of a flight recorder and normal vehicle maintenance performed. A total of over 40,000 total miles was driven in an effort to duplicate and understand the stalling allegations described in customer complaint narratives with one occurrence of stalling captured with the flight recorder while shifting from neutral to drive

In conjunction with the field release of TSB 18-049-07 for service, the PCM software in these vehicles was updated to Cal 16. To date, over 26,000 additional miles has been accumulated on these vehicles updated to Cal 16 with no occurrence of stalling during any operating conditions at any speed. See Enclosure "Test Fleet" for repurchased narratives and mileage accumulation details regarding these seven subject vehicles.

5) Vehicle Braking and Steering Performance

Previously provided test data (January 4, 2008 EA07-007 response A15) confirms that the subject vehicles meet all applicable brake and steering system regulations. Chrysler has been able to demonstrate through the test fleet of repurchased vehicles, and through verifiable field data, that a vehicle stall as a result of the vapor purge corruption does not cause a complete loss of vehicle brake or steering system function. Vehicle regulatory compliance testing of the subject vehicle meets the requirements for proper operation of the brake and steering systems function if a loss of engine power occurs. Supporting test documentation was contained in the January 4, 2008 EA07-007 response Enclosure 15 and Enclosure 15 Confidential Business Info.

6) Vehicle Crash Information

Per ODI request during the previously mentioned March 25, 2008 telephone conversation, Chrysler has again reviewed all available data for five subject vehicle crash events alleging engine stall while driving, and makes the following observations:

- 1) Chrysler is unable to positively confirm that any of these crashes resulted from an engine stall while driving.
- 2) Four of the crash reports note only very minor, if any, vehicle damage (see enclosed sample photographs).
- 3) Only one of these crashes involved an allegation of loss of control, with minor injury and property damage (legal claim 1184504, previously submitted to ODI).

See Enclosure "Vehicle Crash" for a summary of all available information.

7) Distinguishing Recall 06V-432

During the March 25, 2008 telephone conversation, the Agency requested Chrysler to reconcile its approach in this investigation with that of with the 2006 calendar year recall of certain Chrysler Pacifica vehicles that were the subject of EA06-013. While it is indeed true that both EA06-013 and this investigation EA07-007 involve allegations of stalling, the underlying conditions involved in these two investigations – and consequently the manner in which they should be resolved – are vastly different.

The Pacifica recall 06V-432 addressed two separate conditions that could result in stalling within an overlapping population of vehicles. The primary and most significant condition associated with the subject Pacifica vehicles was the result of a defect in the secondary fuel pump module, where an improper press fitting could dislodge and result in an interruption of fuel flow and a resultant stall in vehicles built during a two month window in 2004. During the course of the investigation EA06-013, it was also determined that a TSB to update the PCM software had been released in December of 2005. This TSB addressed a condition creating a vapor purge spike as the result of fuel motion within a saddle style tank during a left hand turn. The port to the vapor canister, located on the left hand side, uses a control valve diaphragm to regulate vapor pressure. A spike in vapor pressure forces the diaphragm open and allows fuel vapors to pass. The PCM software update changed the vapor purge rate by adjusting the solenoid to control vapor input which prevented a burst of vapor input to the engine and a potential for engine stall. Subsequent analysis of all additional complaint data during the investigation confirmed that the issue occurred predominantly during or just following turning.

When Chrysler identified the fuel pump module defect, and decided to conduct a safety recall to address that condition, it was also decided as a precautionary measure to include the larger population of vehicles potentially affected by the vapor purge spike condition and include the update of the PCM software for those vehicles that had not received the TSB, even though a significant difference in rate of occurrence existed.

A key difference between the Pacifica PCM software update and the 4.7L Commander PCM Cal 16 software update relates to the operating conditions during which stalling could occur. As noted above, the Pacifica input would occur during or just following turning. A detailed complaint analysis for the Commander clearly indicates that the vast majority of the conditions

occurred during low speed driving maneuvers and of these only 2% indicated occurrence while turning.

8) Conclusions

Chrysler agrees with ODI's position that complaint data alleging engine stall while driving for the subject vehicles is grouped into two separate populations. Chrysler's detailed analysis of all reports alleging engine stall while driving in early built 2006 model year 4.7L equipped Jeep Commanders strengthens its belief that further action is not warranted. The vast majority of the reported stalling events occurred at low (or presumed low) speeds, and there is no demonstrable evidence that low speed stalls are creating an unreasonable risk of death, injury or property damage. Only a single reported stalling event has resulted in minor injury and property damage. The other four crashes reported cannot be confirmed to have resulted from a stalling event.

TSB 18-049-07 (Cal 16 PCM software) has also had a positive effect on minimizing low speed stalling conditions in the pre January 10, 2006 build population of subject vehicles. In addition, Chrysler's February, 2008 efforts to increase the awareness of TSB 18-049-07 as a possible corrective measure through STAR center notification will help remedy any remaining 2006 model year Jeep Commanders that may experience a stalling condition.

It should also again be noted that all subject vehicles are covered by Chrysler's 8 year / 80,000 mile emission system component warranty, which covers and corrects free of charge any issue identified with the PCM or application of the specified TSB.

Regarding the complaint data received, Chrysler makes the following general observations:

- A vast majority of the vehicles were able to be restarted immediately.
- The stalling condition could generally not be readily duplicated.
- There were no fault or diagnostic codes recorded that would reveal a possible cause of the stalling event.
- The vast majority of the stalling events occurred either at very low or idle speeds.

In the case of a stall, the operator still has the ability to steer and the brakes would operate normally for at least one application of the pedal before additional force would be needed to operate the brakes without assist.

Chrysler believes that there is little or no safety risk in the subject population. The corrective measures that have been taken to date have significantly reduced the number of occurrences of alleged stalling events in those vehicles where no causal condition could be identified. Accordingly, Chrysler believes there is no unreasonable risk to motor vehicle safety and this investigation should be closed.