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6/28/07

DaimlerChrysler Corporation

Stephan J. Speth

Director

Vehicle Compliance & Safety Affairs

June 21, 2007

Mr. Thomas Z. Cooper, Chief, NVS212
U.S. Department of Transportation
1200 New Jersey Avenue, Southeast,
Washington, DC 20590

Reference: PE07-025PIR

Dear Mr. Cooper:

This document contains DaimlerChrysler Company LLC's (DCC) response to the referenced peer inquiry dated May 18, 2007 regarding information concerning the factory installed (OEM) trailer hitch receivers on 2002 and 2003 Dodge Durango and Dodge Ram 1500 and 2500 pickup truck vehicles. 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

cc: Kathleen DeMeter

Attachment and Enclosures

1. State within the body of the response letter and in an electronic spreadsheet format, by model, model year, the total number of subject peer vehicles DCC has manufactured for sale or lease in the United States. Separately, for each vehicle manufactured to date by DCC, state the following:

- a. Make;**
- b. Model;**
- c. Model Year;**
- d. Vehicle identification number (VIN);**
- e. Date of manufacture (in “yyyy/mm/dd” date format);**
- f. Date warranty coverage commenced (in “yyyy/mm/dd” date format) or “Unsold” if not sold; and**
- g. The State in the United States where the vehicle was originally sold or leased (or delivered for sale or lease).**

In addition, provide within the body of the response letter, a table containing the subject peer vehicles by model, model year, GVWR, GCWR, and the corresponding hitch rating(s) including the trailer towing capacity and tongue weight (with and without the weight distribution hitch). Describe which of these vehicle towing attributes can be deciphered from within the vehicle’s VIN code. Provide this spreadsheet table also in a file in Microsoft Excel, or a compatible format, entitled “VEHICLE TOW RATINGS.”

Provide a separate population file for each MY of the peer vehicle and within each MY file, a separate population table for each GVWR group in Microsoft Access 2000, or a compatible format, entitled “MY XX PEER VEHICLE PRODUCTION DATA.” If there are multiple tow ratings for the same model year/GVWR vehicle, denote them.

Note¹: Pursuant to a telephone conversation with ODI’s Peter Ong on May 25, 2007, it was agreed that DaimlerChrysler Company LLC’s (DCC) responsive data should be separated by model only as “Model Year” (MY) can be derived from the VIN position #10 (number denotes MY, ex. 2 = 2002 MY) and “Gross Vehicle Weight Rating” (GVWR Group) can be derived by VIN position #4 (as shown in Vehicle Tow Ratings table in response to question #1 and Enclosure 01 - PRODUCTION DATA). It was also agreed that all data contained in this response is through May 18, 2007.

A1) The detailed response that lists the production data is provided as Microsoft Access 2000 files for each model of the subject peer vehicles in “Enclosure 01 – PRODUCTION DATA”.

The total number of vehicles manufactured for sale in the United States by model is shown below.

Model	Model Years	Volume
Durango	2002-2003	82,090
Ram	2002-2003	374,452

The only factory installed (OEM) hitch receiver on the 2002 and 2003 Dodge Durango and Dodge Ram 1500 or 2500 capable of towing 5,000 lbs. or greater is a Class IV hitch receiver. This Class IV hitch receiver is capable of towing up to 10,000 pounds Gross Trailer Weight (GTW) as rated by the hitch manufacturer, depending on the vehicle specific equipment. DCC has not installed any other hitch receivers on the subject peer vehicles.

After-market hitch receivers may be installed by other entities not within DCC control. Reports relative to these hitch receivers are not included in this response. DCC utilized the vehicle build specifications to determine if the input is inclusive to this response.

The 2002 Durango and Ram Owners Manuals provide detailed Trailer Towing Charts based on specific vehicle options including body style, series, engine, transmission type and axle ratio.

The 2003 Durango and Ram Owners Manuals refer owners to the "Trailer Towing Guide" available from Dodge Dealers and on the internet at www.dodge.com/towing. The website has a step-by-step process to choose the options on the vehicle by model year, model, series, body style, drivetrain, bed length, engine and transmission. The output provided, for available axle ratios, is GVWR, Payload, Curb Weight, Curb Weight Front/Rear, GAWR Front/Rear and GCWR.

Recommended tongue weight is between 10% and 15% of the trailer weight. An equalizing (load distributing) hitch is required for tongue weights above 350 lbs.

A complete copy of the towing information provided in the Owners Manuals for each of the subject peer vehicle models is included in Enclosure 04 - "TOWING INFORMATION".

Vehicle Tow Ratings – 2002 and 2003 Dodge Durango and Ram

VIN Position #4-GVWR Group	GVWR Group Range (lbs.)
H	6,001-7,000
K	8,001-9,000
W	Incomplete Vehicles With Hydraulic Brakes

2. State within the body of the response letter and in an electronic spreadsheet format, a table each showing 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 subject condition in the subject peer vehicles, by MY and by GVWR group:
- 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 peer vehicle, property damage claims, consumer complaints, or field reports;
 - d. Property damage claims (including own vehicle); and
 - 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). Identify reports that are duplicates of other mfg reports/claims.

Provide the table in Microsoft Excel 2000, or a compatible format, entitled "MANUFACTURER REPORT COUNT."

A2)

Model	Consumer Complaints	Field Reports	Crash Reports ²	Property Damage Claims ³	Legal Claims	Lawsuits
Durango	0	0	0	0	0	0
Ram	10	1	1	2	0	0

² Crash reports for purposes of this response are defined as trailer contact with an object after an alleged separation.

³ Property Damage Claims for purposes of this response are personal property damage other than the trailer hitch.

VIN #2M[REDACTED] has one Customer Complaint (CAIR #12407847) and one Property Damage claim. VIN #3C[REDACTED] has one Customer Complaint (CAIR #10790751), one Crash Report and one Property Damage claim.

There are no reports or notices of injury or fatality related to the alleged condition in the subject peer 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 for the subject peer vehicle and each MY by GVWR groups:

- 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 (in "yyyy/mm/dd" date format);
- h. Report or claim date (in "yyyy/mm/dd" date format);
- i. Whether a crash is alleged;
- j. Whether property damage is alleged;
- k. Number of alleged injuries, if any;
- l. Number of alleged fatalities, if any.

Provide a separate complaint table for each model and for each MY of the subject peer vehicle. Provide this information in Microsoft Access 2000, or a compatible format, entitled "REQUEST NUMBER TWO DATA." [Refer to Note¹]

The data is provided in Enclosure 02 - "REQUEST NUMBER TWO DATA".

4. State within the body of the response letter and in an electronic spreadsheet format, by model, model year and GVWR groups, 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 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 (in "dd/mm/yyyy" date format);
- 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 a separate warranty data table for the subject peer vehicles for each MY. Provide this information in Microsoft Access 2000, or a compatible format, entitled "WARRANTY DATA." [Refer to Note¹]

The data is provided in Enclosure 03 - "WARRANTY DATA".

- 5. 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 peer vehicles. State, by make and model year, the terms of the new vehicle warranty coverage (including the OEM hitch receiver) offered by DCC on the subject peer 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 peer vehicles and state by option, model, and model year, the number of vehicles that are covered under each such extended warranty.**

The search criteria used by DCC to identify claims in response to Request No. 4 (identified as Request No. 5 above) can be found in the chart below:

Repair Description	Labor Operation
Hitch/Draw Bar, Trailer Tow	13-70-01

Failure Code	Description
06	Bent
11	Broken or Cracked
27	Damaged
51	Improperly Installed
7X	Weld Defect
UC	Uncodable

The standard warranty offered by DCC on all 2002 and 2003 model year Dodge Durango and Dodge Ram 1500 and 2500 Pick Up Truck vehicles was 36 months / 36,000 miles. There was no extended warranty coverage option related specifically to the subject peer 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.

- 6. Describe the towing option(s) that are available to the owners for which the hitch receiver is installed as original equipment (OEM) on the vehicle including a description of other towing related accessories included in the package. Provide a copy of the owner manual towing section(s) and other available towing literatures that is provided to an owner of an OEM hitch receiver equipped vehicle and any other material that is available to the owner (on request or purchase) concerning towing limits and guides. If the material differs for GVWR groupings please specify.**

Owners of vehicles equipped with factory installed (OEM) hitch receivers may have the following additional towing options: auxiliary transmission cooling, heavy duty engine cooling, power steering cooling and heavy duty suspension. Owners may also choose optional axle ratios that may increase tow capability of the vehicle.

Towing related accessories provided to owners of peer vehicles with OEM hitch receivers may have included a 7 pin to 4 flat wiring adaptor and a electronic brake controller interface harness.

Copies of all the owner manual towing sections for the subject peer vehicles are provided in Enclosure 04 - "TOWING INFORMATION".

Additional towing information is available to owners of the subject peer vehicles at Dodge dealers or at www.dodge.com/towing. An example of available information from dodge.com is provided in Enclosure 04 - "TOWING INFORMATION".