

RMV
12/19/07

December 13, 2007

Mr. Thomas Cooper
Vehicle Integrity Division
Office of Defects Investigation
National Highway Traffic Safety Administration
U.S. Department of Transportation
1200 New Jersey Ave, SE
West Building, Fourth Floor
Washington, D.C. 20590

Dear Mr. Cooper:

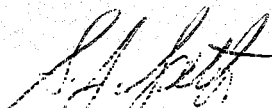
Reference: NVS-212cag; PE07-052

This document contains Chrysler's response to the referenced inquiry regarding Pacifica engine compartment fires in MY 2007 vehicles. By providing the information contained herein, Chrysler is not waiving its claim to attorney work product and attorney-client privileged communications.

A thorough investigation of the alleged condition in 2007 Pacificas revealed that on a very small population of vehicles, a tube nut on the high pressure power steering line was discovered to be cross threaded during the assembly process and did not allow proper sealing of the o-ring. The condition may result in a power steering fluid leak near the exhaust system and is most likely to occur when power steering pressure is highest, such as during parking lot maneuvers. Field data demonstrates that a leak of this nature would be apparent early in the life cycle. Assembly plant process changes were implemented to eliminate cross threading and additional quality control measures were applied to detect power steering fluid leaks. Review of vehicle warranty data indicate a significant decline in power steering fluid leaks attributed to these assembly process and quality control changes and there have been no reported fires for this condition since May 5, 2007.

Chrysler believes there is no unreasonable risk to motor vehicle safety and this investigation should be closed.

Sincerely,


Stephan J. Speth

Attachment and Enclosures

1. **State, by model and model year, the number of subject vehicles Chrysler has manufactured for sale or lease in the United States. Separately, for each subject vehicle manufactured to date by Chrysler, 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."

NOTE: UNLESS OTHERWISE INDICATED, THIS DOCUMENT CONTAINS INFORMATION THROUGH NOVEMBER 2, 2007, THE DATE THE INFORMATION REQUEST WAS RECEIVED.

- A1. The chart below lists the production volumes for 2007 MY Pacifica vehicles with the 3.8L & 4.0L V6 gas engine that have been manufactured by Chrysler LLC ("Chrysler") for sale or lease in the United States.

Vehicle Type	2007 MY Total
Pacifica 3.8L engine	8,866
Pacifica 4.0L engine	51,590
Total Vehicle Volume = 60,456	

The detailed response listing the production data as requested in Items a. through g. is provided in Enclosure 1 as a Microsoft Access 2000 table, titled "PRODUCTION DATA."

2. **State the number of each of the following, received by Chrysler, or of which Chrysler is otherwise aware, which relate to, or may relate to, the alleged defect and/or a leakage of power steering fluid in the subject vehicles:**
 - a. **Consumer complaints, including those from fleet operators;**
 - b. **Field reports, including dealer field reports;**
 - c. **Police and Fire Department reports;**
 - d. **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;**
 - e. **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;**
 - f. **Property damage claims;**
 - g. **Third-party arbitration proceedings where Chrysler is or was a party to the arbitration; and**
 - h. **Lawsuits, both pending and closed, in which Chrysler 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, police 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 "h," provide a summary description of the alleged problem and causal and contributing factors and Chrysler's assessment of the problem, with a summary of the significant underlying facts and evidence. For items "d" through "h," 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 available requested information regarding applicable customer complaints, field reports, property damage claims, arbitration and legal claims is provided in Enclosure 2.

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. Chrysler'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 the incident occurred while operating the vehicle;
 - j. Type of warning or indication of the impending failure, if any, including but not limited to: "smoke," "fluid leak," "hard/no starting," "low battery," "power steering failure/abnormal," etc.;
 - k. Whether a crash is alleged;
 - l. Whether a fire is alleged;
 - m. Whether property damage is alleged;
 - n. Number of alleged injuries, if any;
 - o. Number of alleged fatalities, if any; and
 - p. Whether Chrysler re-purchased the vehicle.

Provide this information in Microsoft Access 2000, or a compatible format, entitled "COMPLAINT DATA."

- A3. The information requested in Items a. through o. is provided in the detailed response to Question 2, Enclosure 2, as part of a Microsoft Access 2000 table, and titled "COMPLAINT DATA."

Chrysler has determined that two vehicles identified within the scope of its response to Request No. 2 were repurchased from the customer. The VINs for the vehicles were VIN# 7R [REDACTED] and VIN# 7R [REDACTED]. The two vehicles were not repurchased for the purpose of investigating the alleged condition, nor was an inspection conducted on these vehicles to achieve this purpose. Rather, these vehicles were repurchased for customer satisfaction reasons. Also, Chrysler does not maintain its warranty claim data in a manner that relates the data to a repurchase event.

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 Chrysler used for organizing the documents.

- A4. See Enclosure 2, which contains files with copies of the available customer complaints, field reports and legal claims.
5. **State, by model and model year, a total count for all of the following categories of claims, collectively, that have been paid by Chrysler to date that relate to, or may relate to, the alleged defect and/or leakage of power steering fluid 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. **Chrysler'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;**
- k. **Type of warning or indication of the impending failure, if any, including but not limited to: "smoke," "fluid leak," "hard/no starting," "low battery," "power steering failure/abnormal," etc.;**
- l. **Comment, if any, by dealer/technician relating to claim and/or repair;**
- m. **Whether there is an indication of a leak; and**
- n. **Whether Chrysler re-purchased the vehicle.**

Provide this information in Microsoft Access 2000, or a compatible format, entitled "WARRANTY DATA."

- A5. There are no labor operation codes within the Chrysler warranty claim system that apply to any type of vehicle fire. Accordingly, there is no warranty data responsive to this request.

Reports of alleged fire events are generally received by the Chrysler Office of the General Counsel, the Chrysler Customer Assistance Center (as a CAIR) or from

other Chrysler 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 Chrysler 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.

The detailed response that lists the warranty claim information as requested in Items a. through m. is provided in Enclosure 5 as a Microsoft Access 2000 table, titled "WARRANTY DATA."

As to a warning or indication, dealer narratives and associated failure codes indicated that the customer may have experienced a power steering fluid leak.

6. **Describe in detail the search criteria used by Chrysler 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 Chrysler 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 Chrysler 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. There are thirteen applicable Labor Operation codes (LOPs) that may apply to the alleged condition of a power steering fluid leak. There are a total of six fluid leak problem codes. See tables below:

Labor Operation Code	Description
19501204	Power steering hose pressure & return replace
19501401	Power steering hose return/gear to cooler replace
19501712	Power steering hose pump supply replace
19501901	Power steering cooler tube replace
19502004	Power steering oil cooler replace
19700101	3.8L Power steering pump replace
19700112	4.0L Power steering pump replace
19705510	3.8L Power steering reservoir replace
19705512	4.0L Power steering reservoir replace
10705601	Power Steering reservoir cap replace

19000105	Power steering gear replace
19501011	4.0L Power steering pressure hose to pump replace
19501012	3.8L Power steering pressure hose to pump replace

Problem Code	Description
X2	Split, cut or torn
62	Line or fitting leak
71	Oil leak
E1	Housing leaks
90	Seal leak
44	Leaks gasket defect

The standard warranty offered on the subject vehicles was 36 month / 36,000 miles. There were no extended warranty coverages for the subject components, but there were service contract coverage options available. There have been no claims made in the service contract coverage for the above labor operation codes. Owners may also have purchased additional coverage through third-party service contract providers. Chrysler has no access to such records.

Chrysler warranty system is designed to compensate dealers for repairs made, and cannot be reliably used to determine any trend related to the alleged condition. It is impossible to determine the reason for each particular warranty claim. There are other random issues that are not related to the alleged condition, yet may still prompt the replacement of the subject components. The warranty claims being submitted are what Chrysler has deemed to be representative of claims that may relate to the alleged condition.

Most warranty claims do not have associated narrative data. In the case where warranty narratives were available, a word search criteria was established to filter those narratives which do not relate to the alleged condition.

- 7. Produce copies of all service, warranty, and other documents that relate to, or may relate to, the alleged defect and/or leakage of power steering fluid in the subject vehicles, that Chrysler 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 Chrysler is planning to issue within the next 120 days.**

- A7. There have been no service, warranty, or other documents that relate to, or may relate to, the alleged defect in the subject vehicles, that Chrysler has issued, or plans to issue, in the next 120 days to dealers, regional or zone offices, field offices, fleet purchasers, or other entities.
8. **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 and/or leakage of power steering fluid in the subject vehicles that have been conducted, are being conducted, are planned, or are being planned by, or for, Chrysler. 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; and**
 - 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.

- A8. Documents detailing all "actions" that relate to, or may relate to, the alleged defect in the subject vehicles are provided in Enclosure 8 Confidential, being submitted to the NHTSA Office of the Chief Counsel under separate cover with a request for confidential treatment. A summary of these actions is provided in Enclosure 8.
9. **Describe Chrysler's quality control and product monitoring actions for the engine, the alternator, the voltage regulator and the power steering systems. Provide the following information:**
- a. **The Control Plan, including but not limited to the potential failures and affects, and the associated control charts;**
 - b. **Testing and data collection methodology;**
 - c. **Record retention and record keeping policy;**
 - d. **Corrective actions planned and implemented for an out of control condition;**
 - e. **The date of component approval/acceptance for production and/or sale, and if the component failed approval/acceptance, provide a detailed description of the reason for failure; and**

f. Component approval/acceptance criteria.

- A9. Descriptions and documents regarding Chrysler's manufacturing Control Plan for the vehicle assembly plant and the Design Failure Mode and Effects Analysis for the power steering system are provided in the attached Enclosure 9, entitled Confidential Business Information, which is being submitted to the NHTSA Office of the Chief Counsel under separate cover with a request for confidential treatment.
10. **Describe all modifications or changes made by, or on behalf of, Chrysler in the design, material composition, manufacture, quality control, supply, or installation of the subject components, 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 number(s) (service and engineering) of the original component;**
 - e. **The part number(s) (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 Chrysler is aware of which may be incorporated into vehicle production within the next 120 days.

- A10. Descriptions and documents regarding Chrysler's Automatic Manufacturing Planning Systems (AMPS) for the assembly of the power steering system is provided in the attached Enclosure 9, entitled Confidential Business Information, which is being submitted to the NHTSA Office of the Chief Counsel under separate cover with a request for confidential treatment. Descriptions and documents regarding Chrysler's manufacturing and quality control process made at the vehicle assembly plant for the power steering system are provided in the attached Enclosure 10, entitled Confidential Business Information, which is being submitted to the NHTSA Office of the Chief Counsel under separate cover with a request for confidential treatment.

11. Produce a layout drawing of the engine, the alternator, and voltage regulator(s), including but not limited to all of the associated diodes, harnesses, connectors and seals; and, the power steering system including the pump, hoses and connectors. Identify each component and its relationship to all adjacent components.

A11. Refer to Enclosure 11, entitled Confidential Business Information, for exemplar drawings of the subject component, which is being submitted to the NHTSA Office of the Chief Counsel under separate cover with a request for confidential treatment.

12. Furnish Chrysler'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. What warnings, if any, the operator and the other persons both inside and outside the vehicle would have that the alleged defect was occurring or subject component was malfunctioning; and**
- f. The reports included with this inquiry.**

A12. Chrysler believes the opportunity for underhood fires (the "alleged condition") may have existed in only a small number of 2007 MY Pacifica vehicles equipped with 4.0L engines (the "affected vehicles"). There was no evidence to suggest that the alleged condition was related in any way to the engine, alternator or voltage regulator (and their related components) in 2007 MY Pacifica vehicles. Moreover, for reasons discussed below, Chrysler believes 2007 MY Pacifica vehicles equipped with 3.8L engines, as well as all previous model year Pacifica vehicles, are not affected by the alleged condition.

Chrysler's investigation has revealed that the power steering system for the affected vehicles was unique, in that it required the attachment of the high pressure line to the steering gear during final plant assembly. The alleged condition is believed to have randomly manifested during the assembly of the steering gear components of the affected vehicles. Chrysler has found that it was possible during assembly to cross-thread the tube nut on the high pressure line during its attachment to the steering gear, thus creating improper seal of the o-ring. Although a rare occurrence, this improper o-ring seal may not have been detected from routine inspections at the assembly plant. For all 3.8L engines, as well as all previous model year Pacifica vehicles, the power steering unit came to the plant pre-assembled. Evidence of this cross-threading condition was not found to exist in any data for the non-affected vehicles.

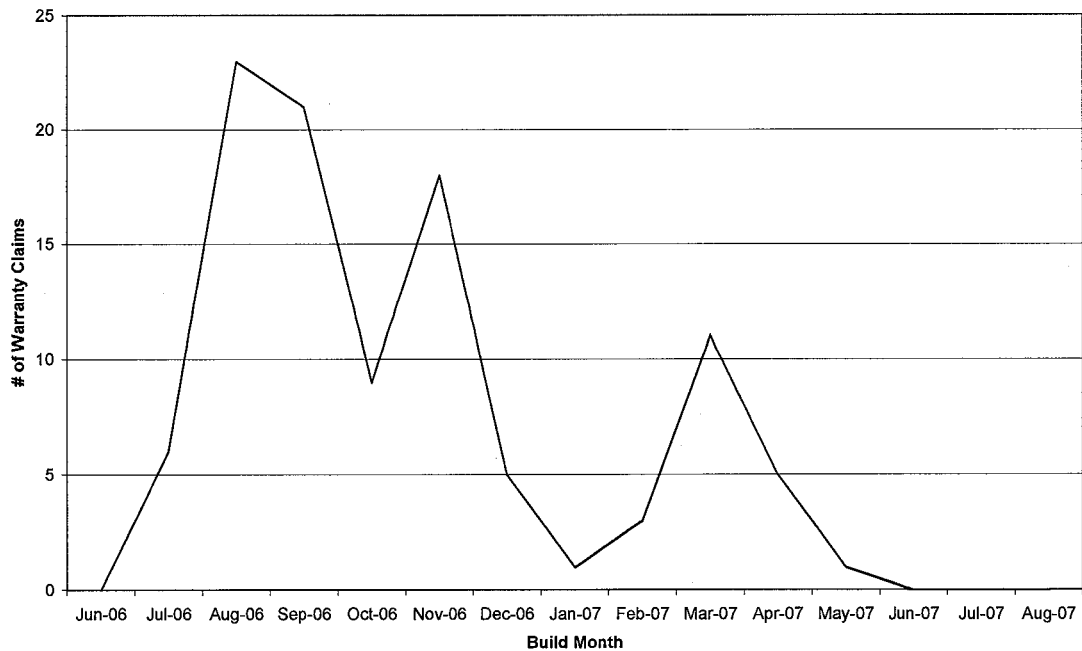
Review of Chrysler's field data suggests that evidence of the cross-threading condition surfaced very early in the affected vehicles' life cycle and did not pose a safety threat while driving. A cross-threading condition that could increase the possibility of a power steering fluid leak is most likely to occur during parking lot maneuvers when the steering travel is at or near its stop and the power steering system pressure is greatest. Under these circumstances, the cross-threading condition may allow power steering fluid to leak, and in rare situations, the fluid to contact the underbody exhaust system, produce a significant amount of smoke, and possibly may ignite. Given the immediate cooling of the exhaust system, ignition, if it were to occur, would happen shortly after key-off or while the vehicle is running.

Chrysler's field input indicates that the vehicle operator was likely warned of impending power steering fluid loss and often experienced a noisy power steering pump or witnessed a leak of red power steering fluid. The warranty repair data supports Chrysler's belief that the rate of power steering system leaks is very low. (See Enclosure 5)

By May 2007, Chrysler instituted several assembly process changes in an attempt to minimize the possibility of cross-threading. Chrysler's assembly process improvements included having two independent operators hand-start the tube nut into the steering gear, allowing for redundant positive tactile feedback of proper thread seating before the final torque was applied. A process change was made to ensure the tube nut was hand started prior to securing the clip, located on the high pressure line, to eliminate the cross thread condition. The production Direct Current (DC) tool parameters improved the sensitivity of detecting and signaling a cross-threaded condition of the tube nut within the PFS system. An additional quality process improvement was implemented to validate the repair of a cross-threaded condition. In the event cross-threading occurred, a vehicle "flagged" for repair and diverted to an end-of-line repair station, would now require a hoist review and supervisor's "buy-off" after completion of the repair. Warranty and field data suggests that these process changes have minimized the possibility of cross-threading the power steering hose line tube nut to the steering gear in the affected vehicles.

Chrysler has received no reports of engine compartment fire that can be attributed to this cross-threading condition in the affected vehicles after May 2007. Warranty claims, by build date, for power steering gear and high pressure line leaks in the affected vehicles have declined, as noted in the chart below.

2007 Pacifica Power Steering Warranty
(Gear and High Pressure Line)



There are no lawsuits, crashes, deaths, injuries or property damage claims relating to underhood fires in 2007 MY Pacifica vehicles. There were 12 unique VINs with customer complaints (CAIRs) or legal claims received by Chrysler that reported 2007 Pacifica engine compartment fires. All of these reported fires involved the 4.0L engine, with 8 of 12 reported fires having occurred below 500 miles and all occurred while parking the vehicle. One reported fire occurred at or near 900 miles. There is no evidence that the remaining 3 reported fires relate in any way to a possible power steering fluid leak condition.

Because it is apparent that a cross-threaded power steering hose connection would have manifested soon after being placed into service, Chrysler believes the remaining population of affected vehicles that are now in service do not have cross-threaded connections. Those affected vehicles that may have experienced the alleged condition were repaired under Chrysler's 3 year/36,000 mile manufacturer's warranty at no cost to the owner. Moreover, field data suggests that the continuous assembly and quality process improvements put in place between November 2006 and May 2007 have eliminated the likelihood of power steering fluid leaks caused by cross-threaded connections.

For these reasons, Chrysler believes there is no unreasonable risk to motor vehicle safety and this investigation should be closed.



CHRYSLER

December 13, 2007

Mr. Anthony M. Cooke
Office of Chief Counsel (NCC-111)
National Highway Traffic Safety Administration
1200 New Jersey Ave., SE, Room W41-227
Washington, DC 20590

Re: Request for Confidential Treatment of Business Information Submitted in PE07-052

Dear Mr. Cooke:

Chrysler LLC ("Chrysler") is submitting information on CDs to the NHTSA Office of Defects Investigation in connection with the above referenced Information Request ("IR"). Based on a careful review of the submission, Chrysler has determined that the files in Enclosures 8, 9, 10, & 11 consist of confidential business information that should be accorded confidential treatment under this agency's regulations and 49 C.F.R. Part 512 and Exemption 4 of the Freedom of Information Act ("FOIA"), 5 U.S.C. § 552(b)(4).¹ Therefore, Chrysler is submitting these CDs together with this request for confidential treatment to the Office of Chief Counsel.

The information required by Part 512 is set forth below.

A. Description of the Information (49 C.F.R. § 512.8(a))

The business information for which confidential treatment is being sought is 4 assessments in Enclosure 8 – Confidential Business Information with Bates page #PE07-052-Chrysler-0001-8. Enclosure 9 – Confidential Business Information consists of 5 documents showing the assembly process, manufacturing control plans, and the design failure mode effects and analysis with Bates page # PE07-052-Chrysler-0009-213. One change notice, one change notice summary, an assembly process change, one document showing the details of the assembly process changes, and a design illustration showing an assembly process change are included in Enclosure 10 – Confidential Business Information with Bates page #PE07-052-Chrysler-0214-221. Enclosure 11 – Confidential

¹ Chrysler has taken steps to assure that the CDs are free of any errors or defects that would prevent NHTSA from opening each file on the disc. If, however, the agency is unable to open any of the files, Chrysler respectfully requests that the agency inform Chrysler of the issue, so that Chrysler may take steps to supply NHTSA's Office of Chief Counsel with a disc that is fully functional.

Business Information contains 17 CATIA drawings of the engine and power steering system for the 3.8L and 4.0L engines that are unable to be Bates numbered.

The table attached to this letter will more fully describe the documents.

B. Confidentiality Standard (49 C.F.R. § 512.8(b))

This submission is subject to the substantial competitive harm standard set forth in 49 C.F.R. § 512.15(b) for information that a submitter is required to provide to the agency.

C. Justification for Confidential Treatment (49 C.F.R. § 512.8(c))

This agency's regulations and Exemption 4 of the Freedom of Information Act ("FOIA"), 5 U.S.C. § 552(b)(4), protect the confidentiality of information that would be likely to cause substantial competitive harm to the submitter if disclosed. *See, e.g. 49 C.F.R. § 512.15(b); Nat'l Parks & Conservation Ass'n v. Morton*, 498 F.2d 765, 770 (D.C. Cir. 1974). FOIA Exemption 4 was enacted to prevent disclosures that would "eliminate much of the time and effort that would otherwise be required to bring to market a product competitive with the [submitter's] product." *Public Citizen Health Research Grp. V. FDA*, 185 F.3d 898, 905 (D.C. Cir. 1999). "Because competition in business turns on the relative costs and opportunities faced by members of the same industry, there is a potential windfall for competitors to whom valuable information is released under FOIA. If those competitors are charged only minimal FOIA retrieval costs for the information, rather than the considerable costs of private reproduction, they may be getting quite a bargain. Such bargains could easily have competitive consequences not contemplated as part of FOIA's principle aim of promoting openness in government." *Worthington Compressors, Inc. v. Costle*, 662 F.2d 45, 51 (D.C. Cir. 1981). Substantial competitive harm also may result from disclosures that would reveal a firm's "operational strengths and weaknesses" to competitors. *See Nat'l Parks & Conservation Ass'n v. Kleppe*, 547 F.2d 673, 684 (D.C. Cir. 1976). The information at issue here should be protected under these standards.²

Chrysler's assessments and evaluations contain valuable information about Chrysler's processes for remedying problems and evaluating and improving products. The disclosure of such information would enable competitors to refine their own product evaluation, remediation, and improvement procedures without incurring the costs normally required for independent development of such procedures, and also would provide information about Chrysler's operational strengths.

The assembly process documents including control and assembly processes and changes should also be accorded confidential treatment because they contain operational procedures. These operational procedures would cause substantial competitive harm if released because competitors could more effectively compete against Chrysler.

² As noted above, Chrysler is providing a table that identifies the confidential information on the enclosed discs; and specifies the location of the information (by enclosure number and Bates page numbers). The table also briefly states the basis for the confidentiality claims.

Competitors would be relieved of the burden and costs of independently reviewing their own procedures and take the end product of months or years of Chrysler's process development and enabling them to bring products competitive with Chrysler's products to market more quickly and at less cost. Competitors would also be given insight into the operational strengths and weaknesses of Chrysler.

The design failure mode effects and analysis document would cause substantial competitive harm if disclosed because this document is a failure-mode analysis that sets forth provisional assessments of potential risks associated with various failure modes. This information sets forth Chrysler's internal performance standards and data analyses. Competitors could determine the type of analyses that Chrysler does and compete more effectively without spending the time and resources to develop their own analyses.

The change notice would reveal information about the design and manufacturing process changes to the subject component, the timing of such changes, the reasons for the changes, and the process by which such changes were made. Thus, this document reveals information about the design and the manufacturing process, as well as Chrysler lead-time and operational capacity information, which could enable Chrysler's competitors to improve their own designs and manufacturing processes, and compete more effectively against Chrysler.

The design drawings contain detailed design specifics for the subject component. Release of these drawings would cause Chrysler substantial competitive harm because competitors could use this design information to improve their designs without spending the resources that Chrysler did in developing these designs. Without spending the same resources these competitors could bring to market their products much quicker and at less cost.

D. Class Determination (49 C.F.R. § 512.8(d))

The information for which confidential treatment is sought does not fit within a class determination.

E. Duration for Which Confidential Treatment is Sought (49 C.F.R. § 512.8(e))

Because Chrysler anticipates that the information will be competitively sensitive indefinitely, Chrysler requests that the information be accorded confidential treatment permanently.

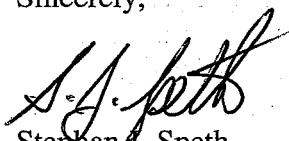
F. Contact Information (49 C.F.R. § 512.8(f))

Please direct all inquiries and responses to the undersigned at:

800 Chrysler Drive, CIMS 482-00-91
Auburn Hills, MI 48326
248-512-4188
SS6@chrysler.com

If you receive a request for disclosure of the information for which confidential treatment is being sought before you have completed your review of our request, Chrysler respectfully requests notification of the request(s) and an opportunity to provide further justification for the confidential treatment of this information, if warranted.

Sincerely,



Stephan J. Speth

cc: Thomas Cooper

Attachment and Enclosures

**ATTACHMENT TO REQUEST FOR CONFIDENTIAL
TREATMENT OF BUSINESS INFORMATION SUBMITTED IN
CONNECTION WITH PE07-052 WITHIN ENCLOSURES 8, 9, 10, &
11 CONFIDENTIAL BUSINESS INFORMATION**

QUESTION # SOURCE	ENCLOSURE	FILE/DOCUMENT NAME	DOCUMENT DESCRIPTION	BATES PAGE #	CONFIDENTIALITY JUSTIFICATION
8 Chrysler	8 Confidential Business Information	07 CS Power Steering Leaks at Rack & Pinion 01-26-07.pdf	Assessment and/or evaluation of power steering leaks	PE07-052-Chrysler-0001	Competitors could determine the assessments that Chrysler uses to evaluate issues and improve their own assessments to compete more effectively against Chrysler.
8 Chrysler	8 Confidential Business Information	07 CS Power Steering Leaks at Rack & Pinion 02-09-07.pdf	Assessment and/or evaluation of power steering leaks	PE07-052-Chrysler-0002	Competitors could determine the assessments that Chrysler uses to evaluate issues and improve their own assessments to compete more effectively against Chrysler.
8 Chrysler	8 Confidential Business Information	Transmittal 12081.pdf	Assessment and/or evaluation of power steering leaks	PE07-052-Chrysler-0003-5	Competitors could determine the assessments that Chrysler uses to evaluate issues and improve their own assessments to compete more effectively against Chrysler.
8 Chrysler	8 Confidential Business Information	Transmittal 12290.pdf	Assessment and/or evaluation of power steering leaks	PE07-052-Chrysler-0006-8	Competitors could determine the assessments that Chrysler uses to evaluate issues and improve their own assessments to

QUESTION # SOURCE	ENCLOSURE	FILE/DOCUMENT NAME	DOCUMENT DESCRIPTION	BATES PAGE #	CONFIDENTIALITY JUSTIFICATION
					compete more effectively against Chrysler.
9 Chrysler	9 Confidential Business Information	Q9.pdf	Manufacturing control plan	PE07-052-Chrysler-0210	Competitors could determine the operational procedure specifics of Chrysler's assembly process and improve their own procedures to compete more effectively against Chrysler.
9 Chrysler	9 Confidential Business Information	Power Steering Fill AMPS.pdf	Design illustration with the assembly process	PE07-052-Chrysler-0011-12	Competitors could determine the design and operational procedure specifics of the CS power steering system and improve their own designs and operational procedures to compete more effectively against Chrysler.
9 Chrysler	9 Confidential Business Information	3.8L Power Steering Overview AMPS.pdf	Design illustration with the assembly process	PE07-052-Chrysler-0009-10	Competitors could determine the design and operational procedure specifics of the CS power steering system and improve their own designs and operational procedures to compete more effectively against Chrysler.
9 Chrysler	9 Confidential Business Information	Secure PS Lines to Gear 4.0L AMPS.pdf	Design illustration with the assembly process	PE07-052-Chrysler-0211-213	Competitors could determine the design and operational procedure specifics of the CS power steering system and improve their own designs and operational procedures to compete more

QUESTION # SOURCE	ENCLOSURE	FILE/DOCUMENT NAME	DOCUMENT DESCRIPTION	BATES PAGE #	CONFIDENTIALITY JUSTIFICATION
					effectively against Chrysler.
9 Chrysler	9 Confidential Business Information	Power Steering System DFMEA.pdf	Design failure mode effects and analysis	PE07-052-Chrysler-0013-209	Competitors could determine how Chrysler evaluates its products and improve their own evaluation systems to compete more effectively against Chrysler.
10 Chrysler	10 Confidential Business Information	PS Change History.pdf	Change notice summary	PE07-052-Chrysler-0217	Competitors could determine the design and manufacturing processes of Chrysler and could improve their own processes to compete more effectively against Chrysler.
10 Chrysler	10 Confidential Business Information	CN60223-M09.pdf	Change notice	PE07-052-Chrysler-0214-215	Competitors could determine the design and manufacturing processes of Chrysler and could improve their own processes to compete more effectively against Chrysler.
10 Chrysler	10 Confidential Business Information	JES - PWR STEERING LINE.pdf	Assembly process change	PE07-052-Chrysler-0216	Competitors could determine how Chrysler evaluates its products and processes and improve their own evaluation systems to compete more effectively against Chrysler.
10 Chrysler	10 Confidential Business Information	Q10.pdf	Details of the assembly process changes	PE07-052-Chrysler-0218	Competitors could determine the manufacturing processes of Chrysler and could improve their own processes to

QUESTION # SOURCE	ENCLOSURE	FILE/DOCUMENT NAME	DOCUMENT DESCRIPTION	BATES PAGE #	CONFIDENTIALITY JUSTIFICATION
					compete more effectively against Chrysler.
10 Chrysler	10 Confidential Business Information	Secure PS Lines to Gear 4.0L AMPS.pdf	Design illustration with a change to the assembly process	PE07-052-Chrysler-0219-221	Competitors could determine how Chrysler evaluates its products and processes and improve their own evaluation systems to compete more effectively against Chrysler.
11 Chrysler	11 Confidential Business Information	07CS38L-1.jpg, 07CS38L-2.jpg, 07CS38L-3.jpg, 07CS38L-4.jpg	Design drawings of the 3.8L engine	N/A	Competitors could determine the design specifics of the CS engine and improve their own designs to compete more effectively against Chrysler.
11 Chrysler	11 Confidential Business Information	07CS40L-1.jpg, 07CS40L-2.jpg, 07CS40L-3.jpg, 07CS40L-4.jpg	Design drawings of the 4.0L engine	N/A	Competitors could determine the design specifics of the CS engine and improve their own designs to compete more effectively against Chrysler.
11 Chrysler	11 Confidential Business Information	07CS38L PS front.jpg, 07CS38L PS plan.jpg, 07CS38L PS side.jpg, 07CS38L PS.jpg	Design drawings of the 3.8L engine power steering system	N/A	Competitors could determine the design specifics of the CS power steering system and improve their own designs to compete more effectively against Chrysler.

QUESTION # SOURCE	ENCLOSURE	FILE/DOCUMENT NAME	DOCUMENT DESCRIPTION	BATES PAGE #	CONFIDENTIALITY JUSTIFICATION
11 Chrysler	11 Confidential Business Information	07CS40L PS front.jpg, 07CS40L PS iso.jpg, 07CS40L PS Rack.jpg, 07CS40L PS side.jpg, 07CS40 PS plan.jpg	Design drawings of the 4.0L engine power steering system	N/A	Competitors could determine the design specifics of the CS power steering system and improve their own designs to compete more effectively against Chrysler.

Certificate in Support of Request for Confidentiality

I, Stephan J. Speth pursuant to the provisions of 49 C.F.R. Part 512, state as follows:

- (1) I am Chrysler LLC's Director, Vehicle Certification, Compliance and Safety Affairs and I am authorized by Chrysler LLC to execute documents on its behalf;
- (2) I certify that the information contained in the attached documents is confidential and proprietary data and is being submitted with the claim that it is entitled to confidential treatment under 5 U.S.C. 552(b)(4);
- (3) I hereby request that the information contained in the indicated documents be protected on a permanent basis;
- (4) This certification is based on the information provided by the responsible Chrysler LLC personnel who have authority in the normal course of business to release the information for which a claim of confidentiality has been made to ascertain whether such information has ever been released outside Chrysler LLC;
- (5) Based upon that information, to the best of my knowledge, information and belief, the information for which Chrysler LLC has claimed confidential treatment has never been released or become available outside Chrysler LLC, except to certain contractors of Chrysler LLC with the understanding that such information must be maintained in strict confidence;
- (6) I make no representations beyond those contained in this certificate and, in particular, I make no representations as to whether this information may become available outside Chrysler LLC because of unauthorized or inadvertent disclosure (except as stated in paragraph 5); and
- (7) I certify under penalty of perjury that the foregoing is true and correct.

Executed on this 13th day of December, 2007



Stephan J. Speth