



CHRYSLER

March 14, 2008

RECEIVED
NVS-213-062

25 MAR 19 A 7 14

OFFICE OF DEFECTS INVESTIGATION

Mr. Jeffrey Quandt, Chief
Vehicle Control Division
Office of Defects Investigation
National Highway Traffic Safety Administration
U.S. Department of Transportation
1200 New Jersey Avenue, SE
West Building, Fourth Floor W48-312
Washington, D.C. 20590

Dear Mr. Quandt:

Reference: NVS-213swmc, PE07-062


This document contains Chrysler LLC's ("Chrysler") response to the referenced inquiry regarding alleged front upper ball joint separation on some 2002 through 2007 model year Jeep Liberty ("KJ") vehicles. In conducting the analysis and by providing the information contained herein, Chrysler is not waiving its attorney work product and attorney-client privilege.

Many customer allegations of upper ball joint separation are lacking supporting documentation or evidence. Therefore, in many cases, Chrysler cannot confirm or deny that an upper ball joint separation occurred and/or determine the cause of any such separation. Nevertheless, all reports containing such allegations are being provided in the response even where the allegations remain unconfirmed.

Chrysler believes that publicity resulting from two prior Jeep Liberty lower ball joint recalls has led to a significant increase in the number of complaints about ball joints in the subject vehicles received by the company. Additionally, there is considerable confusion among customers regarding the distinction between upper and lower ball joints. Thus, a number of complaints that refer to the upper ball joints - and are therefore responsive under the terms of the information request - are specific to the lower ball joints.

Chrysler's investigation is continuing. Analysis of field parts is ongoing and no conclusions regarding a possible root cause of the alleged defect have been reached. Chrysler will continue to monitor the performance of the front upper ball joints in the subject vehicles.

Sincerely,



Stephan J. Speth

Attachment and Enclosures

Pursuant to a telephone conversation with ODI's Stephen McHenry on February 21, 2008 it was agreed to limit the definition of the subject vehicles to 2002-2007 model year Jeep Liberty vehicles. The 2008 model year Jeep Liberty is an all new vehicle, with unique suspension architecture.

Upon receipt of the IR on January 28, 2008, a two week extension was requested via e-mail and subsequently granted by ODI.

Unless otherwise indicated in the response to any of the questions this response contains information through January 28, 2008, the date the information request was received.

1. **State, by model, model year and drivetrain (e.g., four-wheel drive, two-wheel drive), 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. **Model;**
 - c. **Model Year;**
 - d. **Date of manufacture;**
 - e. **Date warranty coverage commenced;**
 - f. **Recall 03V-460 applicability (yes/no);**
 - g. **Recall 03V-460 completion date;**
 - h. **Recall 06V-288 applicability (yes/no);**
 - i. **Recall 06V-288 completion date; and**
 - j. **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, Data Collection Disc, for a pre-formatted table which provides further details regarding this submission.

A1a-j) The requested detail data is provided as a Microsoft Access 2000 file in "Enclosure 1 - Production Data". The total vehicle population is 973,811. A chart summarizing the total number of vehicles manufactured for sale in the United States is titled "Model Year and Drivetrain Totals" and is provided in "Enclosure 1 - 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 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 Chrysler is or was a party to the arbitration; and
- f. Lawsuits, both pending and closed, in which Chrysler 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 Chrysler'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.

A2) The response to question 2 has been divided into two categories. The first category contains reports for which a separation of the upper control arm ball joint was likely, based on Chrysler LLC's ("Chrysler") detailed analysis of all available sources of data. The second category contains reports for which the separation of the upper control arm ball joint was alleged but Chrysler's analysis of all available data sources cannot confirm or deny an upper ball joint separation occurred or its cause. These report details are being included with this response even though the allegation remains unconfirmed. Chrysler has also identified reports in which separation of the vehicle's lower ball joint caused damage to the upper ball joint requiring replacement of the upper control arm assembly. Chrysler is not including these incidents because it believes they are unrelated to this investigation.

Chrysler notes that publicity resulting from two prior Jeep Liberty lower ball joint recalls has led to a significant increase in the number of complaints about ball joints in the subject vehicles that have been received by the company. Much of the data submitted in this response was included on the basis of a liberal application of the term "ball joint" as a causal description for a number of vehicle related complaints, including issues not even relating to the front suspension. Additionally, there is considerable confusion among consumers regarding the distinction between upper and lower ball joints and their respective positions within any given suspension architecture. Indeed, in some cases, it appears that customers

are incorrectly reporting an upper ball joint separation, when in fact a lower ball joint separation or some other front suspension malfunction occurred.

A2a-f) Chrysler is providing a document titled "Summary Chart" in "Enclosure 2 - Complaint and Claim Analysis" including requested counts and comments. A table providing categorization of the relevant Customer Assistance Inquiry Requests ("CAIR") and Claims is included in a document titled "Categorization Chart" in "Enclosure 2 - Complaint and Legal Claim Analysis"

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:
- Chrysler's file number or other identifier used;
 - The category of the item, as identified in Request No. 2 (i.e., consumer complaint, field report, etc.);
 - Vehicle owner or fleet name (and fleet contact person), address, and telephone number;
 - Vehicle's VIN;
 - Vehicle's make, model and model year;
 - Vehicle's mileage at time of incident;
 - Incident date;
 - Report or claim date;
 - Whether a crash is alleged;
 - Whether property damage is alleged;
 - Number of alleged injuries, if any; and
 - Number of alleged fatalities, if any.

Provide this information in Microsoft Access 2000, or a compatible format, entitled "REQUEST NUMBER TWO DATA." See Enclosure 1, Data Collection Disc, for a pre-formatted table which provides further details regarding this submission.

A3a-l) The data is provided as a Microsoft Access 2000 file in "Enclosure 3 - Request Number 2 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 Chrysler used for organizing the documents.

A4) Copies of all unprivileged documents within the scope of Request 4 are provided in "Enclosure 4 - Cust Complaints & 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 the subject components, including all claims for upper control arm replacement, 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. Model;
- e. Repair date;
- f. Vehicle mileage at time of repair;
- g. Repairing dealer's or facility's name, telephone number, city and state or ZIP code;
- h. Labor operation number;
- i. Problem code;
- j. Replacement part number(s) and description(s);
- k. Whether there was a claim for towing within 3-days of the subject component repair claim;
- l. Whether there was a claim for replacement of any of the following components at the same side as the subject component involved in the claim (i.e., right-front or left-front) within 3-days of the subject component repair claim:
 - i) Steering knuckle;
 - ii) Brake rotor; or
 - iii) Half-shaft.
- m. Concern stated by customer;
- n. Cause and correction of concern; and
- o. Additional 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, Data Collection Disc, for a pre-formatted table which provides further details regarding this submission.

A5a-o) The data is provided as a Microsoft Access 2000 file in Enclosure 5 - "Warranty Data".

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) The labor operations and problem codes are described in Enclosure 6 - "Warranty Search Criteria". The standard warranty offered by Chrysler on all 2002-2007 model year Jeep Liberty vehicles is 36 months / 36,000 miles for the subject component. There is no extended warranty coverage option related to the subject components. Owners may have purchased additional warranty coverage through Chrysler or third-party providers not affiliated with Chrysler. Third-party warranty data is not available to Chrysler and is not included with this response.

- 7. Produce copies of all service, warranty, and other documents that relate to, or may relate to, the alleged defect 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, and/or other documents that relate to, or may relate to the alleged condition in the subject vehicles issued to any dealers, regional or zone offices, field offices, fleet purchasers or other entities. Chrysler has no plans to issue any such documents in the next 120 days.

- 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 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.

A8a-f) The testing summary and associated detail reports of all pertinent front upper control arm ball joint "actions" are being submitted in "Enc 8 CONF BUS INFO - Testing." The

documents are being provided to the NHTSA Office of the Chief Counsel, under separate cover with a request for confidential treatment.

- 9. 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 component, 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.

A9a-h) All modifications or changes made by Chrysler or the supplier in the design, material composition, manufacture, quality control, supply, or installation of the subject component, from the start of production to date are being submitted in "Enc 9 - CONF BUS INFO - Chg History." The documents are being provided to the NHTSA Office of the Chief Counsel, under separate cover with a request for confidential treatment.

There are no changes that Chrysler is planning to incorporate within the next 120 days.

- 10. Produce one of each of the following for the subject vehicle:**
- a. Exemplar samples of each design version of the subject component;**
 - b. Field return samples of the subject component exhibiting the subject failure mode; and**
 - c. Any kits that have been released, or developed, by Chrysler for use in service repairs to the subject component/assembly which relate, or may relate, to the alleged defect in the subject vehicles.**

A10a) An exemplar sample of the design version "AC" is being provided via separate UPS shipment addressed to Mr. Stephen McHenry. The design version "AD" was cancelled and the parts provided for service are no longer available.

A10b) Chrysler is vigorously pursuing the return of field samples exhibiting the subject failure mode; however to date, is in possession of only one sample. This sample did not include the ball stud or seal when returned and is not being provided to ODI.

A10c) There are no kits that relate to or may relate to the subject component that have been released or developed for use in service repairs.

- 11. State the number of each of the following that Chrysler has sold that may be used in the subject and/or peer 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. Subject component (or upper control arm assembly if the subject components are not sold/serviced separately); and**
 - b. Any kits that have been released, or developed, by Chrysler for use in service repairs to the subject component/assembly.**

For each component part number, provide the supplier's name, address, and appropriate point of contact (name, title, and telephone number). Also identify by make, model and model year, any other vehicles of which Chrysler is aware that contain the identical component, whether installed in production or in service, and state the applicable dates of production or service usage.

A11a) The service part sales are provided in "Enclosure 11 - Service Part Sales & Supplier Info" and is titled "Service Part Sales". All service part numbers are compatible with all subject vehicle production models and model years. Therefore, there is no specific match of a part number to model year.

A11b) There are no kits released or developed for use in service repairs to the subject component or assembly.

The supplier information is provided in "Enclosure 11 - Service Part Sales & Supplier Info" and is titled "Supplier Info".

This component is unique to the subject vehicles.

- 12. Provide the following for the two- and four-wheel drive versions of the subject vehicles:**
- a. A diagram of the front suspension at static curb weight with longitudinal, lateral and vertical loads;**
 - b. State the design life for the subject components;**

- c. State the service replacement specification for the subject components;
- d. State the material composition of the plastic bearing used in the subject component;
- e. State the hardness specifications for the ball and housing socket of the subject component;
- f. State the surface finish specification of the ball;
- g. Provide a procedure for measuring the end play of the subject component and
- h. State the nominal dimensions and design tolerances of the ball and socket opening.

A12a) The KJ front suspension diagram showing static loading is in "Enclosure 12 CONF BUS INFO - Design Specifications" and is titled "KJ Front Suspension Diagram." The document is being provided to the NHTSA Office of the Chief Counsel, under separate cover with a request for confidential treatment.

A12b-f & 12h) Responses to questions 12b-f and 12h are in "Enclosure 12 CONF BUS INFO - Design Specifications" and is titled "Q12 Table." The document is being provided to the NHTSA Office of the Chief Counsel, under separate cover with a request for confidential treatment.

A12g) A component procedure for measuring end play is included in "Enclosure 12 CONF BUS INFO - Design Specifications" and is titled "TRW End Movement Measurement Instructions." The document is being provided to the NHTSA Office of the Chief Counsel, under separate cover with a request for confidential treatment.

13. 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.

A13) The subject vehicle's front upper ball joint by design is a compression joint and only experiences minimal tension forces during suspension rebound. The shock absorber (damper) withstands the rebound load, provides the suspension rebound stop and dampens the load throughout the working range.

At the time of this response, Chrysler has not been able to identify any root cause that could lead to the alleged defect in the subject vehicles. Chrysler continues to acquire and analyze upper control arm parts returned from the field; however, it has only received one field sample demonstrating the alleged defect. This sample was returned without the ball stud and boot seal, which prevents a complete analysis. Chrysler's investigation is still

Mr. Jeffrey Quandt
Reference: NVS-213swmc; PE07-062
March 14, 2008
Page 9 of 9

Attachment

ongoing and it has not reached a final conclusion as to why the front upper ball joints in the subject vehicles may have separated. Chrysler will continue to monitor the performance of the front upper ball joints in the subject vehicles.



CHRYSLER

March 14, 2008

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 Confidential Business Information
Submitted in PE07-062

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 Enc 8, 9, and 12 consist of confidential business information that should be accorded confidential treatment under this agency's regulations at 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.

Because information supplied by TRW Automotive ("TRW") is included in the information for which Chrysler is seeking confidential treatment, Chrysler is submitting certificates executed by responsible TRW personnel, as well as by Chrysler personnel. 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 in Enc 8 - CONF BUS INFO - Testing consists of 13 TRW testing reports, 10 Chrysler testing reports, 4 design verification plan and reports ("DVP&Rs"), 2 design/engineering drawings, 1 manufacturing process flow chart, and 2 possible future designs. (Bates page #PE07-062-Chrysler-0001-0107.) Enc 9 - CONF BUS INFO - Chg Hist consists of one TRW change history and one Chrysler change history. (Bates page #PE07-062-Chrysler-

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.

0108-0109.) Enc 12 – CONF BUS INFO – Design Spec consists of an engineering drawing with internal specifications listed, a table with internal design specifications listed, and an internal testing procedure to measure end play. (Bates page #PE07-062-Chrysler-0110-0112.)

The table attached to this letter will more fully describe the documents and will provide the principal justification for the confidentiality of the information. (The justifications for the confidentiality of the information are more fully set forth below.)

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

The testing information and DVP&Rs contained in this submission shows how Chrysler and TRW evaluate their products and report on the results of the tests. It reveals the process of analysis and product testing methodology. The disclosure of such information would enable competitors to refine their own product evaluation and reporting processes. Competitors could then also develop and upgrade their own testing protocols, improve design decisions, and gain insights into Chrysler's and TRW's operational capacities

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 principal basis for the confidentiality claims.

without incurring the costs normally required for independent development of such procedures.

The change histories 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, these documents reveal information about the design and the manufacturing process, as well as Chrysler's and TRW's lead-time and operational capacity information, which could enable competitors to improve their own designs and manufacturing processes, and compete more effectively against Chrysler and TRW.

The design/engineering drawings of the subject component contain the detailed design specifics. Release of these drawings as well as the drawings of possible design changes 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 and specifications. Without spending the same resources these competitors could bring to market their products much quicker and at less cost.

In addition, some of the documents including, the manufacturing process flow chart, provide information about the performance and operational capacities of suppliers. The disclosure of such information could relieve competitors of the costs and burdens of independently identifying and assessing suppliers, thereby enabling them to bring products competitive with Chrysler's products to market more quickly and at less cost. *See SMS Data Prods. Grp., Inc. v. United States Dept. of Air Force*, Civ. A. No. 88-0481-LFO, 1989 WL 201031, at *4 (D.D.C. May 11, 1989) (submitter of information had spent years developing a network of subcontractors, and release of the information would give competitors the information "without needing to expend the same time and resources").

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

The document in Enc 8 – CONF BUS INFO - Testing/52088632AC.pdf (Bates page #PE07-062-Chrysler-0023) is subject to the class determination in Appendix B(1) for engineering drawings.

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: Jeffrey Quandt

Attachment and Enclosures

**ATTACHMENT TO REQUEST FOR CONFIDENTIAL
TREATMENT OF BUSINESS INFORMATION SUBMITTED IN
CONNECTION WITH PE07-062 WITHIN ENCLOSURES 8, 9, & 12 -
CONFIDENTIAL BUSINESS INFORMATION**

| QUESTION # SOURCE | ENCLOSURE | FILE/DOCUMENT NAME | DOCUMENT DESCRIPTION | BATES PAGE # | CONFIDENTIALITY JUSTIFICATION |
|-------------------------|--|--|--|---|---|
| 8 TRW | Enc 8 – CONF BUS INFO – Testing | 16-76069 KJ FUCA with CHRYproposed zerk position.pdf | Study of possible design changes | PE07- 062- Chrysler- 0007 | Confidential on the grounds that the documents reveal testing information and competitors could use the information to improve their own testing and design procedures. |
| 8 TRW | Enc 8 – CONF BUS INFO – Testing | 16-76069KJ – 12078 dome plugconcept.pdf | Study of possible design changes | PE07- 062- Chrysler- 0008- 0011 | Confidential on the grounds that the documents reveal testing information and competitors could use the information to improve their own testing and design procedures. |
| 8 TRW | Enc 8 – CONF BUS INFO – Testing | 0836 Pull-Cam; Out_withplots.pdf | Test report | PE07- 062- Chrysler- 0001- 0006 | Confidential on the grounds that the documents reveal testing information and competitors could use the information to improve their own testing procedures. |
| 8 TRW | Enc 8 – CONF BUS INFO – Testing | 7849 Seal Air leak.pdf | Test procedure and results | PE07- 062- Chrysler- 0024 | Confidential on the grounds that the documents reveal testing information and competitors could use the information to improve their own testing procedures. |
| 8 TRW | Enc 8 – CONF BUS INFO - | 7849 Seal Fatigue.pdf | Test procedure and results | PE07- 062- Chrysler- | Confidential on the grounds that the documents reveal |

| QUESTION # SOURCE | ENCLOSURE | FILE/DOCUMENT NAME | DOCUMENT DESCRIPTION | BATES PAGE # | CONFIDENTIALITY JUSTIFICATION |
|----------------------|--|--|-------------------------------|---|--|
| | Testing | | | 0025-0032 | testing information and competitors could use the information to improve their own testing procedures. |
| 8 TRW | Enc 8 – CONF BUS INFO – Testing | 7849 Stud Bending.pdf | Test procedure and results | PE07- 062- Chrysler- 0033 | Confidential on the grounds that the documents reveal testing information and competitors could use the information to improve their own testing procedures. |
| 8 TRW | Enc 8 – CONF BUS INFO – Testing | 7849_impact_.pdf | Test procedure and results | PE07- 062- Chrysler- 0034 | Confidential on the grounds that the documents reveal testing information and competitors could use the information to improve their own testing procedures. |
| 8 TRW | Enc 8 – CONF BUS INFO – Testing | 8612 stud bending.pdf | Test procedure and results | PE07- 062- Chrysler- 0035 | Confidential on the grounds that the documents reveal testing information and competitors could use the information to improve their own testing procedures. |
| 8 TRW | Enc 8 – CONF BUS INFO – Testing | 9600 Run #2 Seal Fatigue Test Report.pdf | Test procedure and results | PE07- 062- Chrysler- 0036- 0043 | Confidential on the grounds that the documents reveal testing information and competitors could use the information to improve their own testing procedures. |
| 8 TRW | Enc 8 – CONF BUS INFO – Testing | 9600 Run #3 Seal Fatigue Test Report.pdf | Test procedure and results | PE07- 062- Chrysler- 0044- 0053 | Confidential on the grounds that the documents reveal testing information and competitors could use the information to |

| QUESTION # SOURCE | ENCLOSURE | FILE/DOCUMENT NAME | DOCUMENT DESCRIPTION | BATES PAGE # | CONFIDENTIALITY JUSTIFICATION |
|--------------------------|--|--|---|---|--|
| | | | | | improve their own testing procedures. |
| 8 TRW | Enc 8 – CONF BUS INFO – Testing | 9600 Run #4 Seal Fatigue Test Report.pdf | Test procedure and results | PE07- 062- Chrysler- 0054- 0063 | Confidential on the grounds that the documents reveal testing information and competitors could use the information to improve their own testing procedures. |
| 8 TRW | Enc 8 – CONF BUS INFO – Testing | 9600 Run #5 Seal Fatigue Report.pdf | Test procedure and results | PE07- 062- Chrysler- 0064- 0072 | Confidential on the grounds that the documents reveal testing information and competitors could use the information to improve their own testing procedures. |
| 8 TRW | Enc 8 – CONF BUS INFO – Testing | 1675069 full pv level DVPRrev10JA01.pdf | Design verification plan and report | PE07- 062- Chrysler- 0012- 0022 | Confidential on the grounds that the documents reveal design testing information and competitors could use the information to improve their own design testing procedures. |
| 8 Chrysler and TRW | Enc 8 – CONF BUS INFO – Testing | 52088632AC.pdf | Engineering drawing with internal specifications listed | PE07- 062- Chrysler- 0023 | Confidential because competitors could determine Chrysler's specifications and improve their specifications and compete more effectively against Chrysler. |
| 8 TRW | Enc 8 – CONF BUS INFO – Testing | DVPR Threader 022306.pdf | Design verification plan and report | PE07- 062- Chrysler- 0073- 0074 | Confidential on the grounds that the documents reveal design testing information and competitors could use |

| QUESTION # SOURCE | ENCLOSURE | FILE/DOCUMENT NAME | DOCUMENT DESCRIPTION | BATES PAGE # | CONFIDENTIALITY JUSTIFICATION |
|----------------------|--|-----------------------|---|------------------------|---|
| | | | | | the information to improve their own design testing procedures. |
| 8 TRW | Enc 8 – CONF BUS INFO - Testing | FUCA Process.pdf | Flow chart of the manufacturing process | PE07-062-Chrysler-0075 | Confidential on the grounds that the document reveals the manufacturing process of TRW and competitors could use this information to improve their manufacturing processes. |
| 8 Chrysler | Enc 8 – CONF BUS INFO - Testing | KJ102 Test Report.pdf | Test report | PE07-062-Chrysler-0084 | Confidential on the grounds that the documents reveal testing information and competitors could use the information to improve their own testing procedures. |
| 8 Chrysler | Enc 8 – CONF BUS INFO - Testing | KJ104 Test Report.pdf | Test report | PE07-062-Chrysler-0085 | Confidential on the grounds that the documents reveal testing information and competitors could use the information to improve their own testing procedures. |
| 8 Chrysler | Enc 8 – CONF BUS INFO - Testing | KJ111 Test Report.pdf | Test report | PE07-062-Chrysler-0086 | Confidential on the grounds that the documents reveal testing information and competitors could use the information to improve their own testing procedures. |
| 8 Chrysler | Enc 8 – CONF BUS INFO - Testing | KJ112 Test Report.pdf | Test report | PE07-062-Chrysler-0087 | Confidential on the grounds that the documents reveal testing information and competitors could |

| QUESTION # SOURCE | ENCLOSURE | FILE/DOCUMENT NAME | DOCUMENT DESCRIPTION | BATES PAGE # | CONFIDENTIALITY JUSTIFICATION |
|----------------------|--|---|---|---|--|
| | | | | | use the information to improve their own testing procedures. |
| 8 TRW | Enc 8 – CONF BUS INFO – Testing | KJ DVPR for Dynaplas seal, 2-11- 07.pdf | Design verification plan and report | PE07- 062- Chrysler- 0076- 0078 | Confidential on the grounds that the documents reveal design testing information and competitors could use the information to improve their own design testing procedures. |
| 8 TRW | Enc 8 – CONF BUS INFO – Testing | KJ UBJ Articulation CATIA study.pdf | Study of the articulation angles of the subject component | PE07- 062- Chrysler- 0079 | Confidential on the grounds that the document reveals design specifics for the subject component and competitors could use this information to improve their designs. |
| 8 Chrysler | Enc 8 – CONF BUS INFO – Testing | KJ UBJ Xrays.pdf | An x-ray articulation study/test of the upper ball joint | PE07- 062- Chrysler- 0080- 0083 | Confidential on the grounds that the documents reveal testing information and competitors could use the information to improve their own testing procedures. |
| 8 TRW | Enc 8 – CONF BUS INFO – Testing | KJ-UBJ.pdf | Design specifics of the subject component | PE07- 062- Chrysler- 0088 | Confidential on the grounds that the document reveals design specifics for the subject component and competitors could use this information to improve their designs. |
| 8 TRW | Enc 8 – CONF BUS INFO – Testing | Pull up study.pdf | Test procedure and results | PE07- 062- Chrysler- 0089- | Confidential on the grounds that the documents reveal testing information |

| QUESTION # SOURCE | ENCLOSURE | FILE/DOCUMENT NAME | DOCUMENT DESCRIPTION | BATES PAGE # | CONFIDENTIALITY JUSTIFICATION |
|----------------------|--|---|---|---|--|
| | | | | 0092 | and competitors could use the information to improve their own testing procedures. |
| 8 TRW | Enc 8 – CONF BUS INFO – Testing | PVPR for stud with geomt 30405.pdf | Design verification plan and report | PE07- 062- Chrysler- 0093- 0095 | Confidential on the grounds that the documents reveal design testing information and competitors could use the information to improve their own design testing procedures. |
| 8 Chrysler | Enc 8 – CONF BUS INFO - Testing | Testing Summary.pdf | Test summary of all testing (developmental and product evaluation) done on the subject component | PE07- 062- Chrysler- 0096 | Confidential on the grounds that the documents reveal testing information and competitors could use the information to improve their own testing procedures. |
| 8 TRW | Enc 8 – CONF BUS INFO - Testing | Thread Eval.pdf | Test procedure and results | PE07- 062- Chrysler- 0097- 0100 | Confidential on the grounds that the documents reveal testing information and competitors could use the information to improve their own testing procedures. |
| 8 Chrysler | Enc 8 – CONF BUS INFO - Testing | VSO Survey 2-25-08 – Field Parts.pdf | Test procedure and results | PE07- 062- Chrysler- 0101- 0102 | Confidential on the grounds that the documents reveal testing information and competitors could use the information to improve their own testing procedures. |
| 8 Chrysler | Enc 8 – CONF BUS INFO - Testing | VSO Survey 2-25-08 – Key.pdf | Test procedure and results | PE07- 062- Chrysler- 0103- 0104 | Confidential on the grounds that the documents reveal testing information and competitors could |

| QUESTION # SOURCE | ENCLOSURE | FILE/DOCUMENT NAME | DOCUMENT DESCRIPTION | BATES PAGE # | CONFIDENTIALITY JUSTIFICATION |
|----------------------|---|--|-------------------------------|---|---|
| | | | | | use the information to improve their own testing procedures. |
| 8 Chrysler | Enc 8 – CONF BUS INFO - Testing | VSO Survey 2-25-08 – Respondents.pdf | Test procedure and results | PE07- 062- Chrysler- 0105- 0106 | Confidential on the grounds that the documents reveal testing information and competitors could use the information to improve their own testing procedures. |
| 8 Chrysler | Enc 8 – CONF BUS INFO - Testing | VSO Survey 2-25-08 – Survey Procedures.pdf | Test procedure | PE07- 062- Chrysler- 0107 | Confidential on the grounds that the documents reveal testing information and competitors could use the information to improve their own testing procedures. |
| 9 Chrysler | Enc 9 – CONF BUS INFO – Chg Hist | Chrysler Change History.pdf | Change history | PE07- 062- Chrysler- 0108 | Confidential because competitors could determine the design and manufacturing process of TRW and Chrysler and could improve their own processes to compete more effectively against TRW and Chrysler. |
| 9 TRW | Enc 9 – CONF BUS INFO – Chg Hist | TRW Change History.pdf | Change history | PE07- 062- Chrysler- 0109 | Confidential because competitors could determine the design and manufacturing process of TRW and Chrysler and could improve their own processes to compete more effectively against TRW and Chrysler. |
| 12 | Enc 12 – CONF BUS | KJ Front Suspension Diagram.pdf | Front suspension | PE07- 062- | Confidential on the grounds that the |

| QUESTION # SOURCE | ENCLOSURE | FILE/DOCUMENT NAME | DOCUMENT DESCRIPTION | BATES PAGE # | CONFIDENTIALITY JUSTIFICATION |
|----------------------|---|---|---------------------------------------|----------------------------|---|
| TRW | INFO – Design Spec | | design diagram | Chrysler-0110 | document reveals design specifics for the subject component and competitors could use this information to improve their designs. |
| 12 Chrysler | Enc 12 – CONF BUS INFO – Design Spec | Q12 Table.pdf | Table of design specification details | PE07-062- Chrysler-0111 | Confidential on the grounds that the document reveals design specifics for the subject component and competitors could use this information to improve their designs. |
| 12 TRW | Enc12 – CONF BUS INFO – Design Spec | TRW - End Movement Measurement Instructions.pdf | Testing procedure | PE07-062- Chrysler-0112 | Confidential on the grounds that the documents reveal testing information and competitors could use the information to improve their own testing procedures. |

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 14th day of March, 2008

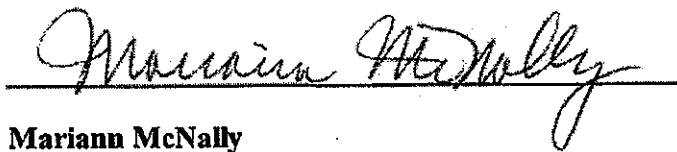

Stephan J. Speth

Certificate in Support of Request for Confidentiality

I, Mariann McNally, pursuant to the provisions of 49 C.F.R. Part 512, state as follows:

- (1) I am Assistant Secretary of and I am authorized by TRW Canada Limited ("TRW Automotive") to execute documents on its behalf;
- (2) I certify that the information contained in the attached documents from TRW (in response to questions 8, 9 and 12 of NHTSA's Information Request to Chrysler LLC in PE07-062) 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 TRW Automotive 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 TRW Automotive;
- (5) Based upon that information, to the best of my knowledge, information and belief, the information for which TRW Automotive has claimed confidential treatment has never been released or become available outside TRW Automotive except to Chrysler LLC and certain contractors of TRW Automotive and/or 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 TRW Automotive 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 11th day of March, 2008



Mariann McNally

Assistant Secretary