



U.S. Department
of Transportation

**National Highway
Traffic Safety
Administration**

1200 New Jersey Avenue SE
Washington, DC 20590

APR 21 2008

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Stephan J. Speth, Director
Vehicle Compliance and Safety Affairs
Chrysler LLC
800 Chrysler Drive
CIMS 482-00-91
Auburn Hills, MI 48326-2757

NVS-212cag
EA08-006

Dear Mr. Speth:

As you are aware, the Office of Defects Investigation (ODI) of the National Highway Traffic Safety Administration (NHTSA) has upgraded PE07-052 to an Engineering Analysis (EA08-006) to further investigate allegations of a fire in the engine compartment of MY 2007 Pacifica vehicles manufactured by Chrysler LLC. This letter is being sent to request additional information to assist us in our investigation.

This office has received 1 new report not previously sent to you alleging that a fire started in the engine compartment of a MY 2007 Pacifica vehicle. A copy of the new Vehicle Owners Questionnaire (VOQ) has been emailed to your representative, and the VOQ number is provided at the end of this letter.

Unless otherwise stated in the text, the following definitions apply to these information requests:

- **Subject vehicles:** all MY 2007 Pacifica vehicles manufactured for sale or lease in the United States.
- **Subject component(s):** the steering gear and the power steering system, including but not limited to, all of their associated connectors, seals, pumps, and hoses.
- **Chrysler:** Chrysler LLC, all of its past and present officers and employees, whether assigned to its principal offices or any of its field or other locations, including all of its divisions, subsidiaries (whether or not incorporated) and affiliated enterprises and all of their headquarters, regional, zone and other offices and their employees, and all agents, contractors, consultants, attorneys and law firms and other persons engaged directly or indirectly (e.g., employee of a consultant) by or under the control of Chrysler (including all business units and persons previously referred to), who are or, in or after 1996, were involved in any way with any of the following related to the alleged defect in the subject vehicles:
 - a. Design, engineering, analysis, modification or production (e.g. quality control);

- b. Testing, assessment or evaluation;
- c. Consideration, or recognition of potential or actual defects, reporting, record-keeping and information management, (e.g., complaints, field reports, warranty information, part sales), analysis, claims, or lawsuits; or
- d. Communication to, from or intended for zone representatives, fleets, dealers, or other field locations, including but not limited to people who have the capacity to obtain information from dealers.

- **Alleged defect:** power steering fluid leakage and/or engine compartment fire.

- **Document:** "Document(s)" is used in the broadest sense of the word and shall mean all original written, printed, typed, recorded, or graphic matter whatsoever, however produced or reproduced, of every kind, nature, and description, and all non-identical copies of both sides thereof, including, but not limited to, papers, letters, memoranda, correspondence, communications, electronic mail (e-mail) messages (existing in hard copy and/or in electronic storage), faxes, mailgrams, telegrams, cables, telex messages, notes, annotations, working papers, drafts, minutes, records, audio and video recordings, data, databases, other information bases, summaries, charts, tables, graphics, other visual displays, photographs, statements, interviews, opinions, reports, newspaper articles, studies, analyses, evaluations, interpretations, contracts, agreements, jottings, agendas, bulletins, notices, announcements, instructions, blueprints, drawings, as-builts, changes, manuals, publications, work schedules, journals, statistical data, desk, portable and computer calendars, appointment books, diaries, travel reports, lists, tabulations, computer printouts, data processing program libraries, data processing inputs and outputs, microfilms, microfiches, statements for services, resolutions, financial statements, governmental records, business records, personnel records, work orders, pleadings, discovery in any form, affidavits, motions, responses to discovery, all transcripts, administrative filings and all mechanical, magnetic, photographic and electronic records or recordings of any kind, including any storage media associated with computers, including, but not limited to, information on hard drives, floppy disks, backup tapes, and zip drives, electronic communications, including but not limited to, the Internet and shall include any drafts or revisions pertaining to any of the foregoing, all other things similar to any of the foregoing, however denominated by Chrysler, any other data compilations from which information can be obtained, translated if necessary, into a usable form and any other documents. For purposes of this request, any document which contains any note, comment, addition, deletion, insertion, annotation, or otherwise comprises a non-identical copy of another document shall be treated as a separate document subject to production. In all cases where original and any non-identical copies are not available, "document(s)" also means any identical copies of the original and all non-identical copies thereof. Any document, record, graph, chart, film or photograph originally produced in color must be provided in color. Furnish all documents whether verified by Chrysler or not. *If a document is not in the English language, provide both the original document and an English translation of the document.*

- **Other Terms:** To the extent that they are used in these information requests, the terms "claim," "consumer complaint," "dealer field report," "field report," "fire," "fleet," "good

will," "make," "model," "model year," "notice," "product evaluation reports," "property damage," "property damage claim," "rollover," "type," "warranty," "warranty adjustment," and "warranty claim," whether used in singular or in plural form, have the same meaning as found in 49 CFR 579.4.

In order for my staff to evaluate the alleged defect, certain information is required. Pursuant to 49 U.S.C. § 30166, please provide numbered responses to the following information requests. Insofar as Chrysler has previously provided a document to ODI, Chrysler may produce it again or identify the document, the document submission to ODI in which it was included and the precise location in that submission where the document is located. When documents are produced, the documents shall be produced in an identified, organized manner that corresponds with the organization of this information request letter (including all individual requests and subparts). When documents are produced and the documents would not, standing alone, be self-explanatory, the production of documents shall be supplemented and accompanied by explanation.

Please repeat the applicable request verbatim above each response. After Chrysler's response to each request, identify the source of the information and indicate the last date the information was gathered.

1. State 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. Engine size (4.0L, 3.8L, etc);
 - c. Date of manufacture;
 - d. Date warranty coverage commenced;
 - e. The vehicles that have not been sold to a first purchaser; and
 - f. 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."

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 and product evaluation 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.

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. Engine size (4.0L, 3.8L, etc);
 - f. Description of the incident;
 - g. Vehicle's mileage at time of incident;
 - h. Incident date;
 - i. Report or claim date;
 - j. Whether the incident occurred while operating the vehicle;
 - k. Indication of an impending failure, if any;
 - l. Whether a crash is alleged;
 - m. Whether a fire is alleged;
 - n. Whether property damage is alleged;
 - o. Number of alleged injuries, if any;
 - p. Number of alleged fatalities, if any; and
 - q. Whether Chrysler re-purchased the vehicle.

Provide this information in Microsoft Access 2000, or a compatible format, entitled "COMPLAINT 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.
5. State 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 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. Engine size (4.0L, 3.8L, etc);
- 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. Concern stated by customer;
- l. Indication of an impending failure, if any;
- m. Comment, if any, by dealer/technician relating to claim and/or repair;
- n. Whether there is an indication of a leak; and
- o. Whether Chrysler re-purchased the vehicle.

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

6. State a total count for all warranty claims, extended warranty claims or repair requests, including, but not limited to, claims maintained in Chrysler's Quality Narrative Analyzer database that have been denied by Chrysler to date that relate to, or may relate to, the alleged defect in the subject vehicles. Separately, for each such claim, state the following information:
 - a. Chrysler's claim number, if any;
 - b. Vehicle owner or fleet name (and fleet contact person) and telephone number;
 - c. VIN;
 - d. Engine size (4.0L, 3.8L, etc);
 - e. Claim date;
 - f. Vehicle mileage at time of claim;
 - g. Repairing dealer's or facility's name, telephone number, city and state or ZIP code;
 - h. Labor operation number, if any;
 - i. Problem code, if any;
 - j. Replacement part number(s) and description(s), if any;

- k. Concern stated by customer;
- l. Comment, if any, provided by dealer/technician relating to claim and/or repair;
- m. Verbatim narrative provided by dealer/technician or customer; and
- n. Chrysler's reason for denying the claim.

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

7. Describe in detail the search criteria used by Chrysler to identify the claims identified in response to Requests Nos. 5 and 6, 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.
8. Produce copies of all service, warranty, and other documents that relate to, or may relate to, the alleged defect in the subject vehicles, that 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 relating to the alleged defect that Chrysler is planning to issue within the next 120 days.
9. 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.

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 through the end of the 2007 MY production, 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.

11. Request No. 11 of the PEIR letter requested "a layout drawing of the engine, the alternator, and the voltage regulator" and an "identification of each component and its relationship to all adjacent components." The response provided in Chrysler's letter dated December 13, 2007, and the email dated January 14, 2008, is not clear and does not provide all the requested information.

Specifically, provide a drawing of the subject components and all adjacent and surrounding components. Each layout drawing should include:

- a. A title and/or label of the subject component(s) and each adjacent and surrounding component(s) in the drawing;
- b. A description of the functioning relationship between the subject component(s) and each adjacent and surrounding component(s);
- c. Identification of the material composition of the subject component(s) and each adjacent and surrounding component(s); and,
- d. The boiling point, flash point, ignition point, melting point and operating temperature of the subject component(s) and each adjacent and surrounding components, including fluids contained within such components.

12. Chrysler stated in its December 13, 2007, response that its investigation of the alleged defect in the subject vehicles concluded 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 an improper seal of the o-ring that may increase the possibility of a power steering fluid leak that may contact the underbody exhaust system and possibly ignite. Identify all information reviewed, analyzed, evaluated, considered or relied upon by Chrysler to form its conclusion. For each item of information identified by Chrysler, provide copies of all documents related to the item, regardless of whether the documents are in interim, draft, or final form.

13. Chrysler states that it implemented several assembly process changes to address the potential for cross-threading of the tube nut on the high pressure line during its attachment to the steering gear. Describe all assessments, analyses, tests, test results, studies, surveys, simulations, investigations, inquiries and/or evaluations that Chrysler relied upon to implement each assembly process change identified in Chrysler's December 13, 2007, response. For each item described, provide copies of all documents related to the item, regardless of whether the documents are in interim, draft, or final form.
14. Separately, for each vehicle identified in Chrysler's response to Requests Nos. 3(q) and 5(o) provide Chrysler's reason for the re-purchase of the vehicles. Identify any tests, studies or assessments performed on the vehicles repurchased by Chrysler. For each item identified, provide copies of all documents related to the item, regardless of whether the documents are in interim, draft, or final form. In addition, provide all documents and correspondence related to each vehicle repurchased by Chrysler.
15. Provide copies of any and all documents in Chrysler's possession from any source related to any assessments, analyses, tests, test results, studies, surveys, simulations, investigations, inquiries and/or evaluations concerning an under hood vehicle fire in the any of the subject vehicles.
16. 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;
 - f. The reports included with this inquiry.

This letter is being sent to Chrysler pursuant to 49 U.S.C. § 30166, which authorizes NHTSA to conduct any investigation that may be necessary to enforce Chapter 301 of Title 49 and to request reports and the production of things. It constitutes a new request for information. Chrysler's failure to respond promptly and fully to this letter could subject Chrysler to civil penalties pursuant to 49 U.S.C. § 30165 or lead to an action for injunctive relief pursuant to 49 U.S.C. § 30163. (Other remedies and sanctions are available as well.) Please note that maximum civil penalties under 49 U.S.C. § 30165 have increased as a result of the recent enactment of the Transportation Recall Enhancement, Accountability, and Documentation (TREAD) Act, Public Law No. 106-414 (signed November 1, 2000). Section 5(a) of the TREAD Act, codified at 49 U.S.C. § 30165(b), provides for civil penalties of up to \$6,000 per day, with a maximum of \$16,375,000 for a related series of violations, for failing or refusing to perform an act required under 49 U.S.C. § 30166. *See* 49 CFR 578.6 (as amended by 71 Fed. Reg. 28279 (May 16, 2006)). This includes failing to respond to ODI information requests.

If Chrysler cannot respond to any specific request or subpart(s) thereof, please state the reason why it is unable to do so. If on the basis of attorney-client, attorney work product, or other

privilege, Chrysler does not submit one or more requested documents or items of information in response to this information request, Chrysler must provide a privilege log identifying each document or item withheld, and stating the date, subject or title, the name and position of the person(s) from, and the person(s) to whom it was sent, and the name and position of any other recipient (to include all carbon copies or blind carbon copies), the nature of that information or material, and the basis for the claim of privilege and why that privilege applies.

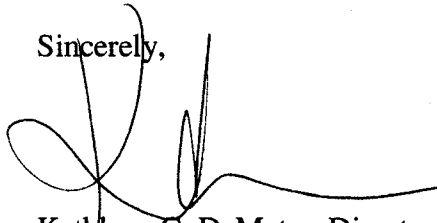
Chrysler's response to this letter, in duplicate, together with a copy of any confidentiality request, must be submitted to this office by June 6, 2008. **All business confidential information must be submitted directly to the Office of Chief Counsel as described in the following paragraph and should not be sent to this office.** In addition, do not submit any business confidential information in the body of the letter submitted to this office. Please refer to EA08-006 in Chrysler's response to this letter and in any confidentiality request submitted to the Office of Chief Counsel. If Chrysler finds that it is unable to provide all of the information requested within the time allotted, Chrysler must request an extension from me at (202) 366-5218 no later than five business days before the response due date. If Chrysler is unable to provide all of the information requested by the original deadline, it must submit a partial response by the original deadline with whatever information Chrysler then has available, even if an extension has been granted.

If Chrysler claims that any of the information or documents provided in response to this information request constitute confidential commercial material within the meaning of 5 U.S.C. § 552(b)(4), or are protected from disclosure pursuant to 18 U.S.C. § 1905, Chrysler must submit supporting information together with the materials that are the subject of the confidentiality request, in accordance with 49 CFR Part 512, as amended (69 Fed. Reg. 21409 et seq; April 21, 2004), to the Office of Chief Counsel (NCC-111), National Highway Traffic Safety Administration, Room W41-227, 1200 New Jersey Avenue, S.E., Washington, D.C. 20590. Chrysler is required to **submit two copies of the documents containing allegedly confidential information (except only one copy of blueprints) and one copy of the documents from which information claimed to be confidential has been deleted.** Please remember that the word "CONFIDENTIAL" must appear at the top of each page containing information claimed to be confidential, and the information must be clearly identified in accordance with 5 U.S.C. § 512.6. If you submit a request for confidentiality for all or part of your response to this IR, that is in an electronic format (e.g., CD-ROM), your request and associated submission must conform to the new requirements in NHTSA's Confidential Business Information Rule regarding submissions in electronic formats (49 CFR 512.6(c)). See 72 Fed. Reg. 59434 (October 19, 2007).

Please send email notification to Cynthia Glass (cynthia.glass@nhtsa.gov) and to ODI_IRresponse@dot.gov when Chrysler sends its response to this office and indicate whether there is confidential information as part of Chrysler response.

If you have any technical questions concerning this matter, please call Cynthia Glass of my staff, at (202) 366-2920.

Sincerely,

A handwritten signature in black ink, appearing to read 'K. DeMeter', with a long horizontal flourish extending to the right.

Kathleen C. DeMeter, Director
Office of Defects Investigation

VOQ Number: 10210167