6/10/08

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June 6, 2008

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; EA08-006

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 indicates 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 vehicles built since May 5, 2007.

Chrysler's investigation and analysis concludes that the remaining risk of underhood fires caused by a cross-threaded tube nut at the steering gear in the small number of 2007 MY Pacifica vehicles equipped with 4.0L engines is extremely low. There are only 36 vehicles sold since April 2008 within one month of ownership. The rate of occurrence of the reported power steering related fires is less than 0.02% and has only occurred within the first month in service. Based on all available data, Chrysler has determined that a customer vehicle beyond one month in service is not at risk for this condition.

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

Sincerely,

S. J. Speth

Stephan J. Speth

Attachment and Enclosures

ATTACHMENT

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."

   NOTE: UNLESS OTHERWISE INDICATED, THIS DOCUMENT CONTAINS INFORMATION FROM NOVEMBER 2, 2007 (CUT-OFF DATE UTILIZED FOR RESPONSE TO PE07-052) TO APRIL 22, 2008 (DATE THE INFORMATION REQUEST FOR EA08-006 WAS RECEIVED).

A1. The chart below lists the production volumes for 2007 model year ("MY") Pacifica vehicles, differentiated by available engine, that have been manufactured by Chrysler LLC ("Chrysler") for sale or lease in the United States.

Vehicle and Engine Type	2007 MY Total Volume
Pacifica w/ 3.8L engine	8,866
Pacifica w/ 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 (EA08-006)"

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.

A2. Chrysler has conducted a reasonable and diligent search of the normal repositories of such information. The non-privileged reports (customer complaints, field reports, property damage claims, arbitration and legal claims) identified by Chrysler that relate to, or may relate to, the alleged condition in the subject vehicles are provided in Enclosure 2. There is only one unique VIN identified that relates to, or may be related to, the alleged condition.

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."

A3. The information requested in Items a. through p. is provided in the detailed response to Question 2, Enclosure 2, as part of a Microsoft Access 2000 table, and titled "COMPLAINT DATA (EA08-006)."

Chrysler has not repurchased any subject vehicles from the customer as a result of the alleged condition, including the single vehicle identified within the scope of Request No. 2 above.

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 documents within the scope of Request No. 2 are provided in Enclosure 2. There are no field reports and only a single customer complaint with an associated legal claim for the single vehicle identified that are responsive.

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."

A5. There are no labor operation ("LOP") 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 Customer Assistance Inquiry Request or "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. The only CAIR, to the extent that it is responsive to this investigation, is being submitted in response to Requests 2, 3, and 4.

The detailed response that lists the warranty claim information as requested in Items a. through m. is provided in Enclosure 3 as a Microsoft Access 2000 table, titled "WARRANTY DATA (EA08-006)." There are two data tables under this filename separated into 3.8L and 4.0L warranty claims.

As an indication to the customer, associated LOP problem codes and limited dealer narratives indicate that the customer may experience a power steering fluid leak.

Chrysler has not repurchased any subject vehicles from the customer as a result of the alleged condition, including the single vehicle identified within the scope of Request No. 2 above.

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 the 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."

A6. Chrysler has not denied any subject vehicle customer repairs or service for the alleged condition within the standard warranty coverage period. There have not been any other warranty claims, extended warranty claims, or repair requests denied for the alleged condition beyond the warranty coverage period.

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.

A7. There are two applicable LOP codes within the Chrysler warranty system that may apply to the alleged condition of a power steering fluid leak at the power steering rack or pressure hose fitting in the subject vehicles. Associated with these LOP codes are six problem codes potentially related to a fluid leak.

LOP Code	Description
19501204	Power steering hose pressure & return replace
19000105	Power steering gear 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 vehicle service contract coverage options available. There have been no claims made in the service contract coverage for the above LOP codes. Owners may also have purchased additional coverage through third-party service contract providers. Chrysler has no access to such records.

The 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.

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.**

A8. Per discussion with Cynthia Glass and Tom Cooper of NHTSA beginning April 30, 2008, it was agreed that Chrysler would conduct a Rapid Response Transmittal ("RRT") through its field service personnel to inspect the high pressure power steering line connection on the 226 unsold 2007 MY Pacifica vehicles equipped with the 4.0L engine vehicles in US dealer inventory. This RRT (#08-044) was launched on May 16, 2008. A reference copy of the RRT documentation was submitted to NHTSA on May 19, 2008 and is also included in Enclosure 4.

The transmittal describes the procedure for inspecting the high pressure power steering line connection for a cross-threaded condition. Two LOP codes were created to track vehicle inspection and/or vehicle repair to determine whether any potential cross-threaded conditions exist. As of June 6, 2007 there have been 90 of 226 unsold 2007 MY Pacifica vehicles inspected by field service personnel for the alleged condition with no reports of the cross-threaded condition.

There have been no other responsive documents issued, or planned to be issued within the next 120 days, relating to the alleged condition.

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.

A9. Chrysler refers the Agency to Request No. 8 from its December 13, 2007 response to the PE07-052 Information Request ("IR") for all responsive non-privileged documents and information. There have been no additional "actions" conducted.

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.

A10. Chrysler refers the Agency to Request No. 10 from its December 13, 2007 response to the PE07-052 IR for all responsive non-privileged documents and information. There have been no additional modifications or changes made to the subject components.

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.

A11. Refer to Enclosure 5, titled "CS Underhood and Underbody Photos" for identification and description, including material information, of all subject components and relevant adjacent and surrounding components.

A detailed description and characteristics of the recommended power steering fluid for the 2007 MY Pacifica is provided as follows:

The recommended fluid for the power steering system is Mopar® Power Steering Fluid+4 or Mopar® ATF+4 Automatic Transmission Fluid. Both Fluids have the same material standard ("MS") specifications MS-9602. A copy of MS-9602 is provided in Enclosure 5.

The power steering system is filled-for-life at the vehicle assembly plant factory and requires no regular maintenance. Although not required at specific intervals, the fluid level may be checked periodically. The Pacifica Owner's Manual states that "The fluid should only be checked if a leak is suspected, abnormal noises are apparent, and/or the system is not functioning as anticipated".

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.

A12. Documents detailing all "actions" considered or relied upon by Chrysler to form its conclusion regarding the cross-threaded tube nut on the high pressure power steering line during attachment to the steering gear were provided in Request No. 8 in the December 13, 2007 response to the PE07-052 IR in Enclosure 8 Confidential with a summary of these actions provided in Enclosure 8.

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.

A13. Documents detailing all "actions" considered or relied upon by Chrysler to form its conclusion regarding the cross-threaded tube nut on the high pressure power steering line during attachment to the steering gear were provided in Request No. 8 in the December 13, 2007 response to the PE07-052 IR in Enclosure 8 Confidential with a summary of these actions provided in Enclosure 8.

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.

A14. Chrysler has not repurchased any subject vehicles from the customer as a result of the alleged condition.

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.

A15. Chrysler refers the Agency to Request Numbers 8 and 12 from its December 13, 2007 response to the PE07-052 IR, as well as to its response to Request No. 8 above, for all responsive non-privileged documents and information.

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.

A16. As stated by Chrysler in its December 13, 2007 PE07-052 IR response, there is no evidence to suggest that the alleged condition was related in any way to 2007 MY Pacifica vehicles equipped with 3.8L engines. All available data continues to support this position.

Since Chrysler's December 13, 2007 PE07-052 IR response there has been only a single reported underhood fire that may relate to the alleged condition in a 2007 MY 4.0L equipped subject vehicle. The mode is consistent in that it occurred at low mileage and within the first month of ownership. After parking the vehicle in a lot, upon exiting the vehicle the customer noticed a (power steering) fluid leak.

The chart below provides all known reports to Chrysler of 2007 MY Pacifica vehicles with power steering related underhood fire input (including those provided to the Agency on December 13, 2007 in response to PE07-052). As can be seen, the report with the highest distance driven occurred at 1,200 miles, and the highest failure by length of time is 32 days.

#	VIN#	MDH	WSD	Event Date	Days	Mileage	CAIR #
1	7R[redacted]	9/11/2006	12/14/2006	1/9/2007	27	178	15851854
2	7R[redacted]	10/4/2006	10/17/2006	11/9/2006	24	150	15744533
3	7R[redacted]	11/3/2006	11/15/2006	12/16/2006	32	16	15845372
4	7R[redacted]	2/10/2007	2/13/2007	3/12/2007	28	400	16056317
5	7R[redacted]	3/14/2007	7/31/2007	6/4/2007	0	50	16652318
6	7R[redacted]	3/22/2007	3/29/2007	4/19/2007	22	4	16227661
7	7R[redacted]	4/13/2007	8/9/2007	8/28/2007	20	1,200	16680579
8	7R[redacted]	4/20/2007	1/31/2008	8/25/2007	0	1	16754133
9	7R[redacted]	5/5/2007	6/23/2007	7/9/2007	17	430	16496777
10	7R[redacted]	9/13/2006	10/6/2007	10/7/2007	1	100	17010352

As noted in Chrysler's December 13, 2007 response to the PE07-052 IR, investigation showed that the power steering system for the affected 2007 MY 4.0L engine equipped vehicles was unique in that it required attachment of the high pressure line to the steering gear during final vehicle assembly. Chrysler 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 the potential for improper sealing of the o-ring. The condition is believed to have randomly manifested during the final vehicle assembly of the steering gear components on affected vehicles. Although a rare occurrence, this improper o-ring seal may not have been detected during routine inspections at the vehicle 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 for any of those vehicles.

As shown in the chart above and based on the review of Chrysler's field data, evidence suggests that this cross-threading condition and subsequent potential for fluid leak occurs within the first month of ownership and does not pose a risk while driving. A cross-threaded connection that could increase the possibility of a power steering fluid leak is also most likely to occur during parking lot type 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 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 data indicates that the vehicle operator may experience a noisy power steering pump, increased steering effort, or witness fluid when it has leaked from the power steering system.

As noted in the December 13, 2007 response to the PE07-052 IR, Chrysler instituted multiple assembly process changes to eliminate 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 engagement 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 between the high pressure line and low pressure line, to eliminate the cross-thread condition. Production Direct Current ("DC") tool parameters improved the sensitivity of detecting and signaling a cross-threaded condition of the tube nut within the Performance Feedback System ("PFS") at the vehicle assembly plant. 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.

Chrysler launched a Rapid Response Transmittal to field service personnel to inspect the power steering line connection on all 226 unsold 2007 MY Pacifica 4.0L vehicles. The current completion rate of the RRT is at 40%. To date, there have been no reported cross-threaded tube nut conditions found.

Chrysler's investigation and analysis concludes that any remaining risk of underhood fires caused by a cross-threaded tube nut at the steering gear in the small number of 2007 MY Pacifica vehicles equipped with 4.0L engines is extremely low. There are only 36 vehicles sold since April of 2008 within one month of ownership. The rate of occurrence of the reported power steering related fires is less than 0.02% and has only occurred within the first month in service. Based on all available data, Chrysler has determined that a vehicle beyond one month in service is not at risk for this condition.

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