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Lawrence J Sak
Senior Manager
Vehicle Compliance & Safety Affairs

December 1, 2008

Mr. Thomas Z. Cooper, Chief
Vehicle Integrity Division
Office of Defects Investigation
National Highway Traffic Safety Administration
U.S. Department of Transportation
1200 New Jersey Avenue SE
West Building, Fourth Floor W48-314
Washington, D.C. 20590

Dear Mr. Cooper:

Reference: NVS-212am; PE08-059

This document contains Chrysler LLC's ("Chrysler") response to the referenced inquiry regarding allegations of turn signal opposite illumination on 2006 model year Dodge Ram 3500 pickup trucks. In performing the analysis and reaching conclusions, and by providing the information contained herein, Chrysler is not waiving its claim to attorney work product and attorney-client privileged communications.

A review of available field data reveals that the opposite illumination condition occurs intermittently and infrequently, it does not repeat on the same vehicle, and the condition often cannot be verified by dealer technicians. There appears to be no pattern to the input by region, months in service, usage or miles driven. In addition, Chrysler is not aware of any crashes, property damage, injuries, fatalities or fires related to this condition in the nearly 3.5 million total vehicles equipped with the identical multifunction switch.

Chrysler has initiated a thorough analysis and investigation, and will continue to assess this condition.

Sincerely,

A handwritten signature in black ink that reads "Lawrence J. Sak". The signature is stylized and cursive.

Lawrence J. Sak

Attachment and Enclosures

1. **State, by model and model year, the number of subject vehicles Chrysler has manufactured for sale or lease in the United States. Separately, for each subject vehicle manufactured to date by Chrysler, state the following:**
 - a. **Vehicle identification number (VIN);**
 - b. **Make;**
 - c. **Model;**
 - d. **Model Year;**
 - e. **Date of manufacture;**
 - f. **Date warranty coverage commenced; and**
 - g. **The State in the United States where the vehicle was originally sold or leased (or delivered for sale or lease)**

Provide the table in Microsoft Access 2000, or a compatible format, entitled "PRODUCTION DATA".

NOTE: UNLESS OTHERWISE INDICATED, THIS DOCUMENT CONTAINS INFORMATION THROUGH OCTOBER 16, 2008, THE DATE THE INFORMATION REQUEST WAS RECEIVED.

- A1. The detailed response that lists the production data for the "Subject Vehicles" (2006 model year Dodge Ram 3500) is provided in Enclosure 01 - Production Data as a Microsoft Access 2000 file, titled, "Production Data (PE08-059) Subject."

The detailed response that lists the production data for the "Other Vehicles" (other Chrysler vehicles that contain the identical Subject Component, i.e., Multifunction Switch) is provided in Enclosure 01 - Production Data as a Microsoft Access 2000 file, titled, "Production Data (PE08-059) Other."

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; and**

- 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" and "d", 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. Chrysler is providing a document titled "Summary Chart Subject Vehicles" in Enclosure 02 - Complaints & Claim Analysis, which includes non-privileged reports identified by Chrysler that relate to, or may relate to, the alleged condition in the subject vehicles. Chrysler conducted a reasonable and diligent search of records retained in the ordinary course of business for response to this question.

Chrysler is providing a document titled "Summary Chart Other Vehicles" in Enclosure 02 - Complaints & Claim Analysis, which includes non-privileged reports identified by Chrysler that relate to, or may relate to, the alleged condition in the subject vehicles. Chrysler conducted a reasonable and diligent search of records retained in the ordinary course of business for response to this question.

3. **Separately, for each item (complaint, report, claim, notice, or matter) within the scope of your response to Request No. 2, state the following information:**
- a. **Chrysler's file number or other identifier used;**
 - b. **The category of the item, as identified in Request No. 2 (i.e., consumer complaint, field report, etc.);**
 - c. **Vehicle owner or fleet name (and fleet contact person), address, and telephone number;**
 - d. **Vehicle's VIN;**
 - e. **Vehicle's make, model and model year;**

- f. **Vehicle's mileage at time of incident;**
- g. **Incident date;**
- h. **Report or claim date;**
- i. **Whether a crash is alleged;**
- j. **Whether a property damage is alleged;**
- k. **Number of alleged injuries, if any; and**
- l. **Number of alleged fatalities, if any.**

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

- A3. The detailed response that lists the customer complaints, field reports, and legal claims and lawsuits from Request No. 2, as requested in Items a. through l. is provided in Enclosure 03- Request Number Two Data as a Microsoft Access 2000 file, titled "Request Number Two Data (PE08-059) Subject Vehicles."

The detailed response that lists the customer complaints, field reports, and legal claims and lawsuits from Request No. 2, as requested in Items a. through l. is provided in Enclosure 03- Request Number Two Data as a Microsoft Access 2000 file, titled "Request Number Two Data (PE08-059) Other Vehicles."

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 for the subject vehicles are provided in Enclosure 04 - Field Data. The documents are organized by report type: Customer complaint (CAIR), Field Report, or Legal Claim/Lawsuit. For the customer complaints the documents are arranged in folders by CAIR number, for the field reports by VIN and for the legal claims/lawsuits by claimant name. For the consumer complaints the CAIR summaries are submitted in one pdf file instead of being located in the individual CAIR folders.

Copies of all documents within the scope of Request No. 2 for the Other Vehicles are provided in Enclosure 04 - Field Data.

5. **State, by model and model year, a total count for all of the following categories of claims, collectively, that have been paid by Chrysler to date that relate to, or may relate to, the alleged defect in the subject vehicles: warranty claims; extended warranty claims; claims for good will services that were provided; field, zone, or similar adjustments and**

reimbursements; and warranty claims or repairs made in accordance with a procedure specified in a technical service bulletin or customer satisfaction campaign.

Separately, for each such claim, state the following information:

- a. Chrysler's claim number;**
- b. Vehicle owner or fleet name (and fleet contact person) and telephone number;**
- c. VIN;**
- d. Repair date;**
- e. Vehicle mileage at time of repair;**
- f. Repairing dealer's or facility's name, telephone number, city and state or ZIP code;**
- g. Labor operation number;**
- h. Problem code;**
- i. Replacement part number(s) and description(s);**
- j. Concern stated by customer; and**
- k. 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".

- A5. The detailed response that lists the warranty claims is provided in Enclosure 05 - Warranty Data as a Microsoft Access 2000 file, titled "Warranty Data (PE08-059) Subject Vehicles."

The detailed response that lists the warranty claims for the Other Vehicles is provided in Enclosure 05 - Warranty Data as a Microsoft Access 2000 file, titled "Warranty Data (PE08-059) Other Vehicles."

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 options(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 search criteria used by Chrysler to identify claims for Request No. 6, pertaining to both the subject vehicle and the Other Vehicles is being provided in Enclosure 06 – Warranty Search Criteria.

The standard warranty offered on the subject vehicle and Other Vehicles was 36 month/36,000 miles. There was no extended warranty coverage for the subject component, but there were service contract coverage options available for purchase through Chrysler's authorized dealers which extended coverage on the subject component. These plans fall under the category of Mopar Maximum Care which extends coverage for a range up to 100,000 miles or up to seven years depending on the contract selected. Any service contract claims for the applicable labor operation code is included in the warranty data being provided. Chrysler notes that owners also have the opportunity to purchase additional service contract coverage through other third-party providers, but Chrysler neither has access to nor maintains that data.

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 purchases, 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 has been one service "Technical Tip" (GPOP) issued that involves the subject component for the subject vehicles, GPOP # 9001452 (issue date January 2, 2008). A copy of the communication is provided in Enclosure 07 – Communications, titled "GPOP 9001452."

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.

- A8. The requested information regarding tests conducted by Chrysler, or on behalf of Chrysler that relate to, or may relate to, the alleged defect, in the subject vehicles, is included in Enclosure 08 - Conf Bus Info. 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 of 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 numbers (service and engineering) of the original equipment;**
 - e. **The part number (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.**
- A9. All modifications or changes made by Chrysler or the subject component supplier in the design, material composition, manufacture, quality control, supply, or installation of the subject component, from the start of production to date are included in Enclosure 08- Conf Bus Info, titled "Change History PE08-059 2006 D1." The documents are being provided to the NHTSA Office of Chief Counsel, under separate cover with a request for confidential treatment.

10. **State the number of each of the following that Chrysler has sold that may be used in the subject 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.**
- a. **Subject component; 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.

- A10. The service part sales are provided in Enclosure 09 – Service Part Sales, titled “Part Sales.” It is impossible to determine what prompted these part sales. There are various circumstances that are not related to this alleged condition, yet still require part sales/replacement of the subject component. Chrysler has concluded that part sales data can not be used to determine any trend related to the alleged condition. The subject multifunction switch is used on various other models so the 2006 total includes the part sales for these models also.

For any other vehicles (“Other Vehicles”) identified by Chrysler as containing the subject component, provide a response to requests numbered 1 through 6 with the subject vehicles as “Other Vehicles”. Identify the response as Other Vehicles, 1 through 6.

11. **Provide the following:**
- a. **One sample of the original subject component;**
 - b. **One sample each of all modified subject components as identified in response to request number 9 above; and**
 - c. **Two samples of failed field returned subject components.**

- A11.
- a. An exemplar sample of the multifunction switch is being provided for the subject vehicle. This part has been shipped to Ali Motamedamin of NHTSA ODI on December 1, 2008 via UPS ground with tracking information provided by e-mail.
 - b. Since the multifunction switch has not changed since production introduction in 2002, no modified subject component is being provided.

- c. Two samples of failed field returned subject components are being provided for the subject vehicle. These parts have been shipped to Ali Motamedamin of NHTSA ODI on December 1, 2008 via UPS ground with tracking information provided by e-mail.

12. Furnish Chrysler's assessment of the alleged defect in the subject vehicle, including:

- a. **The causal or contributory factor(s);**
- b. **The failure mechanism(s);**
- c. **The failure mode(s);**
- d. **The risk to motor vehicle safety that it poses;**
- e. **What warnings, if any, the operator and the other persons both inside and outside the vehicle would have that the alleged defect was occurring or subject component was malfunctioning; and**
- f. **The reports included with this inquiry.**

Chrysler has conducted analysis of field data concerning the multifunction switch ("Subject Component") for the 2006 model year Dodge Ram 3500 ("Subject Vehicle") and reports of opposite illumination ("Alleged Defect" as agreed to by NHTSA ODI). Turn signal operation is one of several functions of the multifunction switch. Because the largest source of field data - warranty claims - cannot be parsed to specifically isolate reports of opposite illumination, the actual complaint rates for opposite illumination are unknown, but are believed to be much lower than the overall warranty rate.

Nevertheless, taking into account all reported customer complaint and field report data for the subject component multifunction switch that may be related to the alleged defect, the complaint rate for the subject vehicle population is very low (less than 35 conditions per 100,000 vehicles, or 0.035%). Moreover, when including the data from the entire population of vehicles using the identical multifunction switch (the "Other Vehicles" identified in Response No. 10), the complaint rate is significantly lower (less than 8 conditions per 100,000 vehicles or 0.008%).

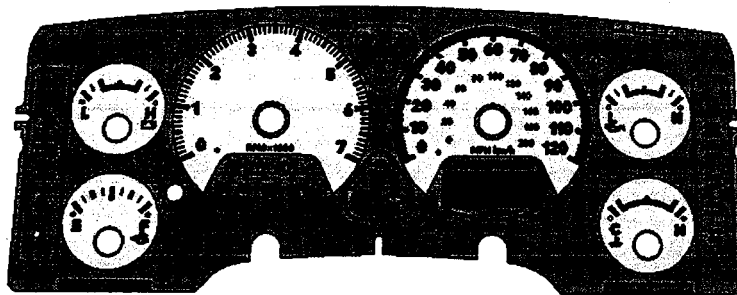
Chrysler's review of the field data also reveals that the opposite illumination condition occurs intermittently, it does not repeat again on the same vehicle and the condition often cannot be verified by dealer technicians. There appears to be no pattern to the reports by region, months in service, usage or miles driven.

The multifunction switch is hard wired into the instrument cluster. The cluster reads the input resistance of the multiplexed multifunction switch and determines which turn signal switch has been selected (left or right). Once the instrument cluster determines which turn signal has been selected, the cluster transmits the

appropriate electronic turn signal switch status message to the TIPM (Totally Integrated Power Module) over the vehicle's CAN bus. The TIPM responds to these messages by controlling the battery voltage output and the flash rate for either the right or left turn signal lamps. The TIPM also sends the appropriate electronic message back to the cluster to control the illumination and flash rate of the right or left turn signal indicators, as well as to control the click rate of the electromechanical relay that emulates the sound emitted by a conventional turn signal flasher. The turn signals and the turn signal indicators continue to flash on and off until the cluster receives a turn signal-off input from the multifunction switch, or until the ignition switch is turned to the "Off" position, whichever comes first.

The turn signal operation on the subject vehicles only allow the vehicle's exterior turn signal lamps (exterior) and the turn signal indicators (cluster) to illuminate together - either right or left. The system does not allow for the turn signal lamps and turn signal indicators in the cluster to illuminate opposite of each other. For example, the system will not allow the vehicle's right outside turn signal to be illuminated while the left turn signal indicator illuminates in the cluster.

As a result, the operator will always receive a visual confirmation of the intended operation of the turn signal by the illumination of the turn signal indicator in the cluster. The turn signal indicators, located in the instrument cluster, are large left and right arrows that illuminate, as seen below. If the operator selected the right turn signal and the cluster determined the left turn signal switch was selected, the cluster would illuminate the left turn signal indicator. This will give the operator a clear visual indication the system is not functioning correctly and should prompt the operator to arrange to have the vehicle serviced.



2006 MY Dodge Ram 3500
Instrument Cluster

Although reports of an opposite illumination condition were intermittent and very rare, Chrysler nevertheless conducted a study in January of 2008 to further understand the possible causes of this condition. The results of this study are included in Enclosure 08.

Chrysler looked at various potential causes of opposite illumination, such as terminal crimps, terminal contamination of both female and male terminals, and printed circuit board (PCB) analysis. Chrysler concluded that the multifunction switch crimps from exemplar samples showed no evidence of damage that would cause resistance to change and affect turn signal operation. Analysis of both the wire harness terminals and multifunction switch connector blades terminals also showed no evidence of contamination that would cause the resistance to change. Analysis showed some indication of PCB wear and contamination of the pad and contact area due to post stamping the spring contacts after plating which could cause the nickel plating to fracture and expose the copper. Contamination of the exposed copper material could possibly change the resistance of the multifunction switch input to the cluster, and theoretically lead to an opposite illumination. However, Chrysler also evaluated whether adding gold plating to the switch contacts would improve the resistance of the switch, but the results were inconclusive.

In a laboratory environment, a change in resistance could be created by wearing down and contaminating the contact area and, theoretically, triggering an opposite illumination condition. However, there is no evidence the small amount of field data correlates to the conditions created in the laboratory environment. The occurrences of opposite illumination are rare, intermittent and without regard to months in service, miles driven, driver usage or exposure to potentially contaminating environments.

There have been no reports of crashes, fatalities, injuries, fires or property damage relating to the alleged condition in the nearly 3.5 million vehicles that are equipped with the identical multifunction switch that is the subject component of this investigation. In the highly unlikely event this condition does occur, operators are getting immediate feedback through the instrument panel cluster of a possible turn signal malfunction and there is no evidence the condition repeats in the same vehicle. Chrysler is continuing to monitor and assess field data relating to reports alleging turn signal opposite illumination.

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

The business information for which confidential treatment is being sought in Enclosure 8 contains testing and analysis documents—specifically the files titled: “1x-life preplate gold SEM.pdf,” “129243sr.pdf,” “129700turnsignal.pdf,” “129951mr.pdf,” “130173mr.pdf,” “13074mr.pdf,” “Review of the Multi-Function Switch Connector.pdf,” “DR DH FACTUAL CPRT 1-22-2008.pdf,” and “Testing Summary.pdf”—and a change history document—“Change History PE08-059 2006 D1.pdf”—which details the design and material changes to the subject component. (Bates page #PE08-059-CHRYSLER-0001 - 0058)

The table attached to this letter will more fully describe the documents and will provide the principle 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 of 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

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 principle basis for the confidentiality claims.

The testing data and summary would give competitors insights into Chrysler's and Yazaki's testing standards, procedures, and analyses. This information would enable competitors to develop and refine test standards and procedures without incurring the substantial expense typically required for independent test development. Consequently, the release of this information would enable competitors to reduce their testing and development costs, thereby enabling them to bring products competitive with the products of Chrysler and Yazaki to market more quickly and at less cost, which, in turn, would enable them to compete more effectively against Chrysler and Yazaki. As a result, Chrysler and Yazaki would suffer substantial competitive harm. In addition, the testing information would provide competitors with insights into how Chrysler and Yazaki analyze test data.

The change history 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 lead-time and operational capacity information, which could enable competitors to improve their own designs and manufacturing processes, evaluate Chrysler's operational strengths, and compete more effectively against Chrysler.

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

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

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

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

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

Please direct all inquiries and responses to the undersigned at:
800 Chrysler Drive, CIMS 482-00-91
Auburn Hills, MI 48326
248-512-0087
LJS11@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,

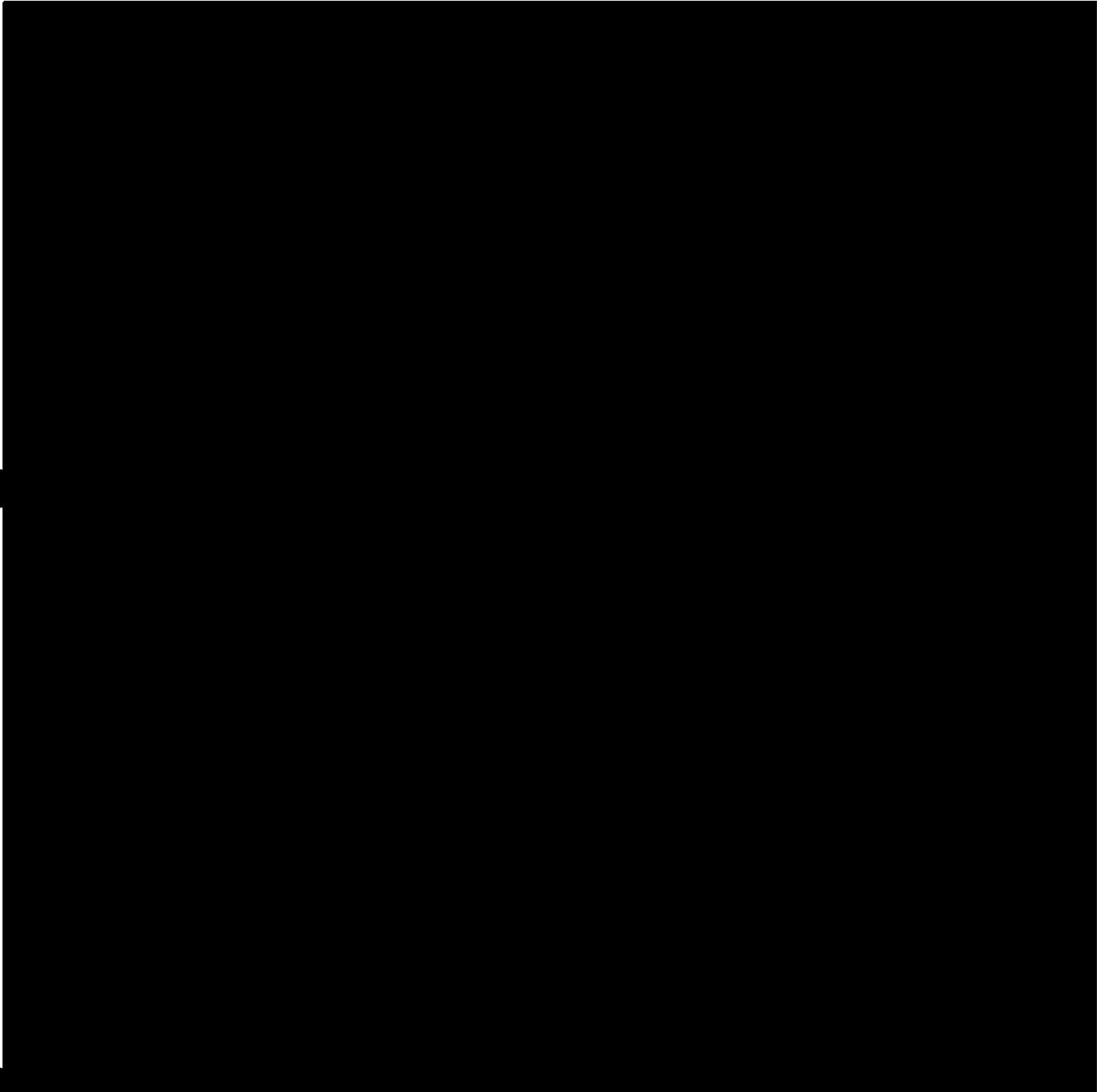
A handwritten signature in black ink, appearing to read "Lawrence J. Sak". The signature is written in a cursive style with a prominent initial "L" and a long horizontal stroke at the end.

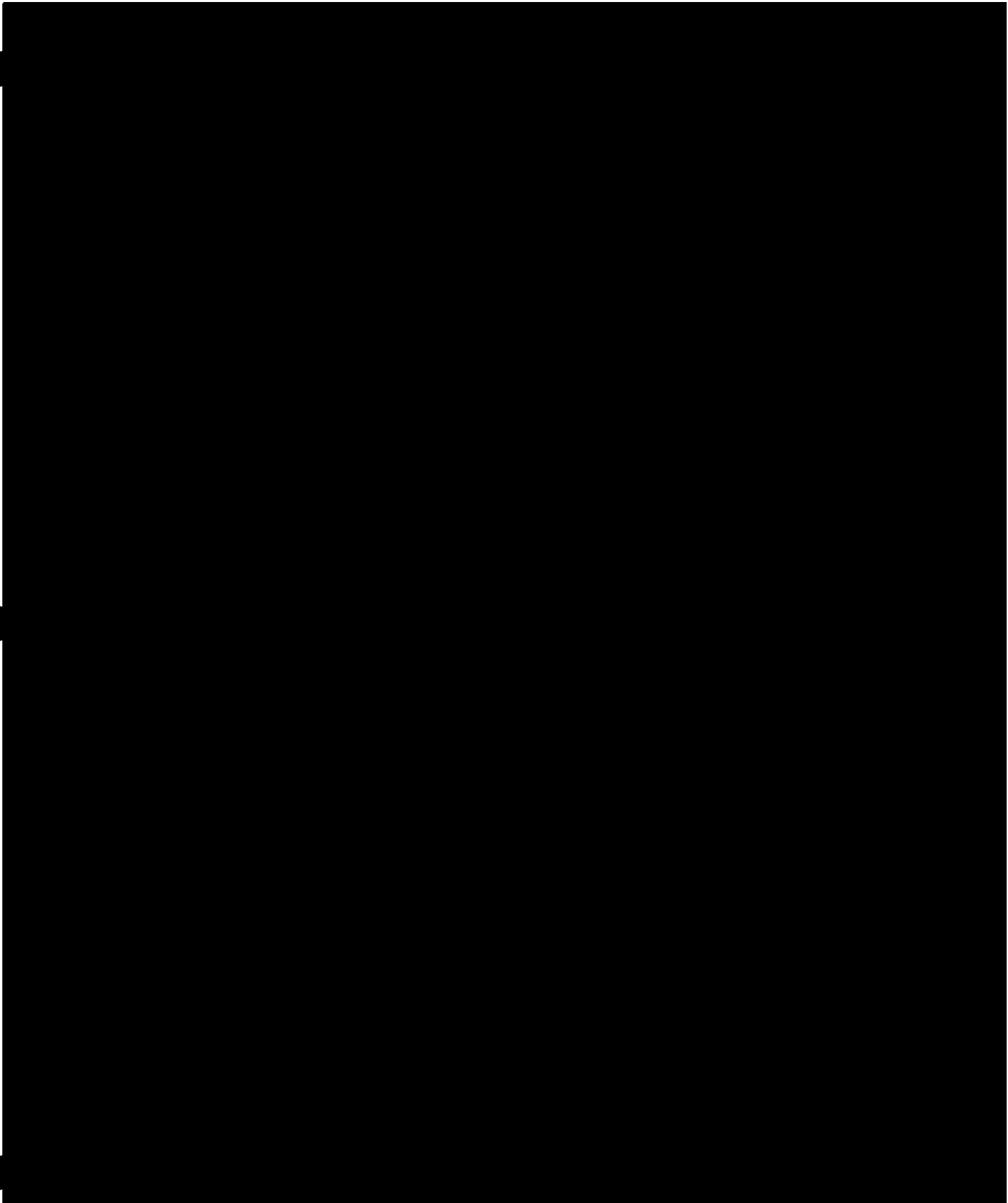
Lawrence J. Sak

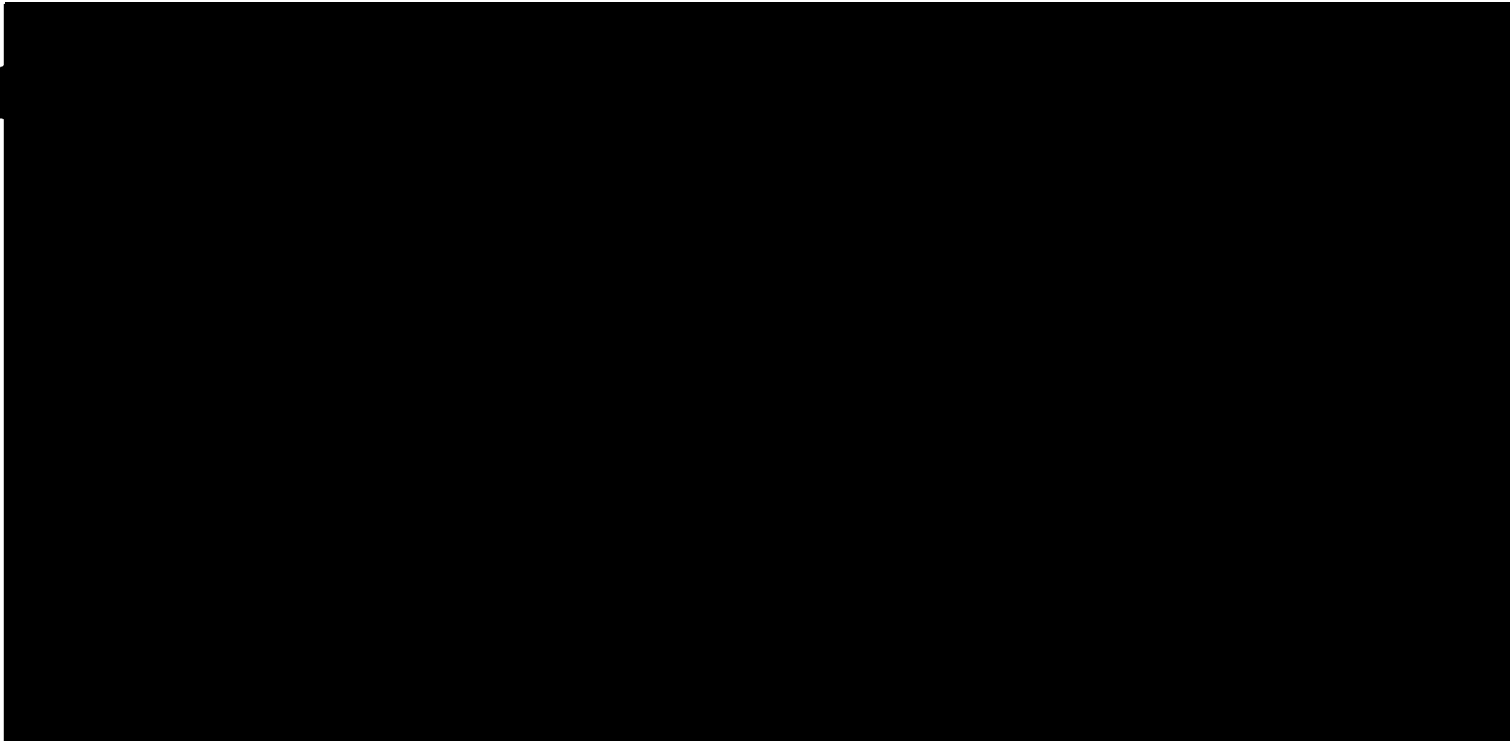
cc: Thomas Cooper

Attachment and Enclosures

**ATTACHMENT TO REQUEST FOR CONFIDENTIAL
TREATMENT OF BUSINESS INFORMATION SUBMITTED IN
CONNECTION WITH PE08-059 WITHIN ENCLOSURE 8
CONFIDENTIAL BUSINESS INFORMATION**





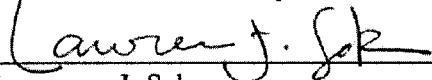


Certificate in Support of Request for Confidentiality

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

- (1) I am Chrysler LLC's Senior Manger, Product Investigations & Campaigns 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 2nd day of December, 2008



Lawrence J. Sak

Certificate in Support of Request for Confidentiality

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

- (1) I am **Barbara Long, Chrysler Business Unit President** and I am authorized by **Yazaki North America, Inc.** 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 **Yazaki North America, Inc.** 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 **Yazaki North America, Inc.**;
- (5) Based upon that information, to the best of my knowledge, information and belief, the information for which **Yazaki North America, Inc.** has claimed confidential treatment has never been released or become available outside **Yazaki North America, Inc.**, except to Chrysler LLC and certain contractors of **Yazaki North America, Inc.** 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 **Yazaki North America, Inc.** 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 25th day of November, 2008

I certify under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Barbara Long 11-25-08

Barbara Long – Chrysler Business Unit President