

David D. Dillon
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June 18, 2010

Mr. Scott Yon
Vehicle Integrity Division
Office of Defects Investigation
National Highway Traffic Safety Administration
1200 New Jersey Ave, SE, W48-314
Washington D.C. 20590

Re: NVS-212jfa; PE10-012

Dear Mr. Yon:

Enclosed please find Chrysler Group LLC's response to the information request in PE0-012. By providing the information contained herein, Chrysler is not waiving its claim to attorney work product and attorney-client privileged communications.

As explained in greater detail in our response, an investigation of the accelerator pedal assemblies identified oversized bearing pockets in certain MY 2007 Dodge Caliber and Jeep Compass vehicles built between March 8 and May 19, 2006. The oversized bearing pocket could cause the pivot bushings to dislodge. It was determined that the parts with the oversized bearing pockets were manufactured from cavity #2 of a 2-cavity tool. The oversized bearing pocket was corrected by the supplier at their molding facility in March of 2006.

The affected vehicles are equipped with an Electronic Throttle Control system that utilizes "Smart Brake" technology, which allows a brake pedal input to override the throttle control system. It was determined that the risks associated with dislodged pivot bushings, together with the presence of "Smart Brake" technology in the affected vehicles do not present an unreasonable risk to motor vehicle safety.

Chrysler Group LLC decided nonetheless to conduct a voluntary safety recall to inspect the accelerator pedal assembly, determine the build date and cavity mold of assembly and replace all potentially affected pedal assemblies produced from cavity mold #2 and installed on vehicles

manufactured between March 7 and May 19, 2006. On June 1, 2010, Chrysler Group LLC filed its Part 573 Defect Information Report with the agency and noted that this action was taken even though the condition does not present an unreasonable risk to motor vehicle safety.

Chrysler Group LLC believes this investigation should be closed.

Sincerely,

A handwritten signature in blue ink, appearing to read "David D. Dillon". The signature is fluid and cursive, with the first name "David" and last name "Dillon" clearly distinguishable.

David D. Dillon

Attachment and Enclosures

Preliminary Statement

On April 30, 2009 Chrysler LLC, the entity that manufactured and sold the equipment that is the subject of this Information Request, filed a voluntary petition for relief under Chapter 11 of Title 11 of the United States Bankruptcy Code.

On June 10, 2009, Chrysler LLC sold substantially all of its assets to a newly formed company now known as Chrysler Group LLC. Pursuant to the sales transaction, Chrysler Group LLC assumed responsibility for safety recalls pursuant to 49 U.S.C. Chapter 301 for vehicles that were manufactured and sold by Chrysler LLC prior to the June 10, 2009 asset sale.

On June 11, 2009, Chrysler LLC changed its name to Old Carco LLC. The assets of Old Carco LLC that were not purchased by Chrysler Group LLC, as well as the liabilities of Old Carco that were not assumed, remain under the jurisdiction of the United States Bankruptcy Court – Southern District of New York (*In re Old Carco LLC, et al.*, Case No. 09-50002).

NOTE: UNLESS OTHERWISE INDICATED, THIS DOCUMENT CONTAINS INFORMATION THROUGH MAY 11, 2010 THE DATE THE INFORMATION REQUEST WAS RECEIVED.

- 1. State the number of all subject vehicles Chrysler has manufactured for sale in the United States. Separately, for each vehicle manufactured to date by Chrysler, state the following:**
- a. Vehicle identification number (VIN);**
 - b. Date of manufacture;**
 - c. If equipped with brake override (yes or no);**
 - d. Date warranty coverage commenced; and**
 - e. 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.”

- A1. The chart below lists the production volumes for 2007 MY Caliber vehicles that have been manufactured by Chrysler LLC (“Chrysler”) for sale or lease in the United States.

Vehicle Type	2007 MY Total
Caliber	176,185
Total Vehicle Volume = 176,185	

The detailed response listing the production data as requested in Items a. through e. is provided in Enclosure1 as a Microsoft Access 2007 table, titled "PRODUCTION DATA."

- 2. State the number of each of the following, received by Chrysler, or of which Chrysler is otherwise aware, which relate to, or may relate to, the alleged defect in the subject vehicles:**
- a. Consumer complaints;**
 - 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 the alleged defect in a subject vehicle, property damage claims, consumer complaints, or field reports;**
 - d. Third-party arbitration proceedings where Chrysler is or was a party to the arbitration; and,**
 - e. 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, reports from retailers, etc.) separately. Multiple incidents involving the same vehicles 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 item "c" 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" and "e," identify the parties to the action, as well as the caption, court, docket number, and date on which the complaint or other document initiating the action was filed.

- A2. The available requested information regarding applicable customer complaints, field reports, property damage claims, arbitration and legal claims is provided in Enclosure 2.**

The chart below lists the number of customer complaints, field reports, legal claims, and the total number of unique VINs.

Customer Complaints	Field Reports	Legal Claims	Unique VINs
29	7	2	34

- 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, report from retailer, etc.);**
 - c. Vehicle owner's name, address, and telephone number;**
 - d. Vehicle identification number (VIN);**
 - e. Model year;**
 - f. Vehicle date of manufacture;**
 - g. Incident date;**
 - h. Report or claim date;**
 - i. Number of alleged crashes;**
 - j. Number of alleged injuries; and**
 - k. Number of alleged fatalities.**

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

- A3. The information requested in Items a. through k. is provided in the detailed response to Question 2, Enclosure 2, as part of a Microsoft Access 2007 table, and titled "REQUEST NUMBER TWO 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, reports from retailers, etc.) and describe the method Chrysler used for organizing the documents.**
- A4. See Enclosure 2, which contains files with copies of the available customer complaints, field reports and legal claims.
- 5. State a total count for all of the following categories of claims, collectively, that have been paid by Chrysler 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; 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's name and telephone number;**
- c. Vehicle identification number (VIN);**
- d. Model Year**
- e. Vehicle date of manufacture;**

- f. Repair date;**
- g. Repairing 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; and**
- l. Comment, if any, by the technician or person(s) making the repair, and/or the person(s) processing the claim that relate to the claim and/or repair.**

Provide this information in Microsoft Access 2007, or a compatible format, entitled "WARRANTY DATA."

- A5. The detailed response that lists the warranty claim information as requested in Items a. through I. is provided in Enclosure 3 as a Microsoft Access 2007 table, titled "WARRANTY DATA."
- 6. Describe in detail the search criteria used by Chrysler to identify the claims identified in response to Request No. 5, including the labor operations, problem codes, part numbers and any other pertinent parameters used. Provide a list of all labor operations, labor operation descriptions, problem codes, and problem code descriptions applicable to the alleged defect in the subject vehicles. State the terms of the new vehicle warranty coverage offered by Chrysler on the subject vehicles (i.e., the number of months for which coverage is provided and the vehicles systems that are covered). Describe any extended warranty coverage option(s) related to the alleged defect that Chrysler offered for the subject vehicles and state by option, model, and model year, the number of vehicles that are covered under each such extended warranty.**
- A6. There are two applicable Labor Operation Codes (LOPs) and four problem codes that may apply to the alleged condition of unwanted vehicle acceleration or engine power, or a failure of the accelerator pedal to return to the idle position. See tables below:

Labor Operation Code	Description
14801005	Pedal, Accelerator - Replace
14800701	Sensor, Accelerator Pedal Position – Test And Replace

Problem Code	Description
07	Binds, Sticks, or Seized
ML	Check Engine /Service Engine Soon
PI	Poor Idle
UC	Uncodable (Narrative Field)

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

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

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

- 7. Produce copies of all service, warranty, and other documents that relate to, or may relate to, the alleged defect in the subject vehicles that Chrysler has issued to any retailers or distributors, regional or zone offices, field offices, or other such 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. Chrysler released Technical Service Bulletin number 14-004-10 to the field on May 7, 2010 to address sticking accelerator pedals and involves inspecting the accelerator pedal assembly bushing and if necessary replacing the accelerator pedal assembly on vehicles built between March 1, 2006 and April 30, 2006. There has been no warranty or other documents that relate to, or may relate to, the alleged defect in the subject vehicles, that Chrysler has issued. Chrysler plans to issue, in the next 120 days to customers, dealers, regional or zone offices, field offices, fleet purchasers, or other entities, Recall K11 as outlined in Chrysler Group LLC's Part 573 Defect and Noncompliance report issued June 3, 2010.

See Enclosure 4, which contains a copy of the Technical Service Bulletin 14-004-01.

- 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. Documentation relating to the assessments of the alleged condition is provided in Enclosure 5 and in Enclosure 6 entitled "Confidential Business Information" and discussed further in A.10 which is being submitted to the NHTSA Office of the Chief Counsel under separate cover with a request for confidential treatment.

- 9. Describe all modifications or changes made by, or on behalf of, Chrysler in the design, material composition, manufacture, quality control, supply, or installation of the subject component, from the start of production to date, which relate to, or may relate to, the alleged defect in the subject vehicles. For each such modification or change, provide the following information:**
- a. The date or approximate date on which the modification or change was incorporated into vehicle production;**
 - b. A detailed description of the modification or change;**
 - c. The reason(s) for the modification or change;**
 - d. The part numbers (service and engineering) of the original component;**
 - 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.**

Also, provide the above information for any modification or change that Chrysler is aware of which may be incorporated into vehicles production within the next 120 days.

A9. There were no design changes made to the pedal assembly which relate to, or may relate to, the alleged defect in the subject vehicles. The supplier's internal controls found parts to be out of specification and put in place corrective action.

Descriptions and documents regarding the supplier's corrective action change for the tool used to manufacture pedal housings with the alleged defect condition are provided in the attached Enclosure 6, Confidential Business Information, which is being submitted to the

NHTSA Office of the Chief Counsel under separate cover with a request for confidential treatment.

10. Furnish Chrysler's assessment of the alleged defect in the subject vehicles 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, that the alleged defect was occurring or that the subject component was malfunctioning; and**
- f. The reports included with this inquiry.**

Beginning in March 2007, an analysis of the available warranty part returns identified a small percentage returned with missing bushings, all from vehicles built between March 21 and April 24, 2006. Evaluation of the returned parts determined that the size of the bearing pockets in the pedal assembly housings were larger than specified. Further analysis of the available field data and customer complaints reveals all reports of dislodged pivot bushings were traced to vehicles built between March 8 and May 19, 2006. Investigation determined that the parts with the oversized bearing pockets were manufactured from cavity #2 of a 2-cavity tool. It was also determined that 7,245 of the pedal assembly housings were molded between February 22 and February 24, 2006 from cavity #2 with the oversized bearing pockets and assembled between March 1 and March 31, 2006. The oversized bearing pocket was corrected by the supplier at their molding facility on March 6, 2006 as referenced in the 8 Step Corrective Action document in Enclosure 6.

The 2007 Caliber and Compass are both equipped with an Electronic Throttle Control system that utilizes "Smart Brake" technology that allows a brake pedal input to override the throttle control system. An initial assessment by Chrysler LLC determined that the risks associated with dislodged pivot bushings, together with the presence of "Smart Brake" technology in the affected vehicles do not present an unreasonable risk to motor vehicle safety (see Enclosure 5). Subsequent reviews of this information have not changed our conclusion.

Chrysler Group LLC decided nonetheless to conduct a voluntary safety recall to inspect the accelerator pedal assembly, determine the build date and cavity mold of assembly and replace all potentially affected pedal assemblies produced from cavity mold #2 and installed on vehicles manufactured between March 7 and May 19, 2006. This action was taken even though the condition does not present an unreasonable risk to motor vehicle safety.

On June 1, 2010, Chrysler Group LLC notified the NHTSA that it will conduct a voluntary safety recall to inspect the accelerator pedal assembly, determine the build date and mold cavity number of the pedal housing molding, and replace all potentially affected pedal assemblies produced from mold cavity #2 that were installed on vehicles between March 7 and May 19, 2010.

- 11. 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 (including the cut-off date for sales, if applicable):**
- a. Subject component(s); and**
 - b. Any kits that have been released, or developed, by Chrysler for use in service repairs to the subject component(s)/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.

Chrysler used part number 04891623AB (pedal Assembly) manufactured by the supplier through December 31, 2006 for use in the subject vehicles. Chrysler has confirmed that the supplier did not ship any of the pedal assemblies with oversized bushing pockets to any facilities other than the Belvidere assembly plant for use in production of the subject vehicles.

Chrysler has sold 218 of the 04891623AB pedal assemblies for use in service. None of the pedal assemblies used in service were affected by the oversized bearing pocket condition.

The following chart provides the number of PART SALES for 04891623AB in the subject vehicles.

Part Number	Description	CY	JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP	OCT	NOV	DEC	Total
04891623AB	PEDAL	2006	0	0	0	4	5	4	4	1	1	5	4	2	30
04891623AB	PEDAL	2007	7	15	12	11	7	7	7	3	1	0	1	3	74
04891623AB	PEDAL	2008	1	6	0	8	12	0	3	4	4	2	2	1	43
04891623AB	PEDAL	2009	7	2	3	7	3	7	2	3	1	3	2	3	43
04891623AB	PEDAL	2010	7	6	8	4	3	0	0	0	0	0	0	0	28

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Mr. Scott Yon
Reference: NVS-212/jfa; PE10-012
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ATTACHMENT

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The 2007 Jeep Compass and Jeep Patriot utilized the same pedal as the subject vehicles for use in production of the 2007 MY. However, Chrysler has determined that there were only 71 Jeep Compass and no Jeep Patriot vehicles affected by the oversized bearing pockets within the accelerator pedal assembly.