



October 15, 2010

Mr. Scott Yon, Chief
Vehicle Integrity Division (VID), NVS-212
U.S. Department of Transportation
National Highway Traffic Safety Administration (NHTSA)
Office of Defects Investigation (ODI)
Room W48-314
1200 New Jersey Avenue SE
Washington, D.C. 20590

Reference: NVS-212llh; PE10-031

Dear Mr. Yon:

Attached is Chrysler Group LLC's partial response to the referenced inquiry. In performing the analysis and reaching conclusions, and by providing the information contained herein, Chrysler Group LLC is not waiving its claim to attorney work product and attorney-client privileged communications. As agreed, Chrysler Group LLC will be providing the remainder of its response to this inquiry on November 12, 2010.

Sincerely,

A handwritten signature in cursive script that reads "David D. Dillon".

David D. Dillon

Attachment and Enclosures

Preliminary Statement

On April 30, 2009 Chrysler LLC, the entity that manufactured and sold the vehicles that are 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 the 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 indicated otherwise in the response to a question, this document contains information through Sept. 3, 2010, the date the information request was received.

1. **State within the body of the response letter a summary table, 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. **Model year;**
 - c. **Whether or not the vehicle was originally equipped (manufactured) with a brush guard, skid guard, or covering for the bottom of the fuel tank (i.e., a protective guard);**
 - d. **If not originally equipped, whether or not a protective guard was optionally available from Chrysler, and if so, the part number of the optionally available protective guard;**
 - e. **Date of manufacture (in “dd/mm/yyyy” date format);**
 - f. **Date warranty coverage commenced (in “yyyy/mm/dd” date format); 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 2007, or a compatible format, entitled “SUBJECT VEHICLE PRODUCTION DATA.”

A1. The detailed response listing the production data as requested in Items a. through g. is provided in Enclosure 1 as a Microsoft Access 2007 table, titled “PRODUCTION DATA.”

With regard to subsections c. and d., Chrysler Group notes that a fuel tank skid plate is an off-road driving accessory that is typically offered on sport utility vehicles. Fuel tank skid plates were offered as optional equipment on both the 1993-1998 MY Jeep Grand Cherokee (ZJ) and the 1999-2004 MY Jeep Grand Cherokee (WJ) and as part of the Upcountry Suspension Package. As the term implies, it is a plate that is positioned on the underside of the vehicle below the fuel tank. The primary purpose of the skid plate is to permit the vehicle to “skid” or slide over an obstacle to avoid abrading or damaging the fuel tank surface during low speed off-road excursions into uneven or unfamiliar environments. It allows the equipped vehicle to slide over brush, rocks, debris, and other similar obstacles.

Brush guards were not offered as either original or optional equipment on the Jeep Grand Cherokee (ZJ). Brush guards were original equipment provided on Jeep Grand Cherokee (WJ) vehicles if they were not equipped with an optional skid plate. Brush guards are thinner than skid plates (i.e. 1 mm v. 3 mm) and are intended to protect the fuel tank in less rugged off-road excursions, for example, where the vehicle is being driven through a field.

The design of the fuel tank of the Jeep Grand Cherokee, along with the vehicle structure surrounding the fuel tank, including body cross members and frame rails, provide protection in accidents, including rear impact accidents. Because of the severe nature of crash forces, it is

possible that in some accidents in any vehicle, with or without a skid plate or brush guard, fuel tank damage and possibly fuel leakage may occur.

The chart below lists the production volumes for 1993 – 2004 MY Jeep Grand Cherokee vehicles that were manufactured for sale or lease in the United States.

Vehicle Type	MY Total
1993 – 1998 Jeep Grand Cherokee (ZJ)	1,506,288
1999 – 2004 Jeep Grand Cherokee (WJ)	1,462,626
Total Vehicle Volume = 2,968,914	

Optional skid plates for the 1993 – 1998 Jeep Grand Cherokee (ZJ) vehicles are identified in Enclosure 1 by the following sales codes:

- ADL - Skid Plate Group (All Skid Plates)
- AWN - Skid Plate /Tow Hook Group (All Skid Plates)
- XEE - Fuel Tank Skid Plate (Fuel Tank Only Skid Plates)

The 1999 – 2004 Jeep Grand Cherokee (WJ) vehicles were originally equipped with a standard brush guard. Vehicles equipped with optional skid plates in Enclosure 1 are identified by the following optional sales codes:

- ADL - Skid Plate Group (All Skid Plates)
- XEE - Fuel Tank Skid Plate (Fuel Tank Only Skid Plates)

The part numbers associated with the optional skid plates are identified in Chrysler Group's response to Question 9.

- 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, fire, injury, or fatality, based on claims against the manufacturer involving a death or injury, and notices received by the manufacturer alleging that a death or injury was caused by a possible defect in a subject vehicle;**
 - d. Property damage claims;**
 - e. Third-party arbitration proceedings where Chrysler is or was a party to the arbitration; and**

- f. Lawsuits, both pending and closed, in which Chrysler is or was a defendant or codefendant.**

For subparts “a” through “d” state the total number of each item (e.g., consumer complaints, field reports, etc.) separately. Multiple incidents involving the same vehicle are to be counted separately. Multiple reports of the same incident are also to be counted separately (i.e., a consumer complaint and a field report involving the same incident in which a crash occurred are to be counted as a crash report, a field report and a consumer complaint).

In addition, for items “c” through “f,” provide a summary description of the alleged problem and causal and contributing factors and Chrysler’s assessment of the problem, with a summary of the significant underlying facts and evidence. For items “c” through “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, and details of the resolution of the matter.

Include reports in which the subject vehicle was struck in the rear by another vehicle. As used here, rear includes crashes in which the striking vehicle hit the subject vehicle at an angle that included the rear, and is not limited to direct crashes to the rear of the subject vehicle. Fire reports where the ignition source was from other than the crash are responsive and are to be included in your response. Reports of fuel leaks or fires where no crash occurred, such as fuel leaks that occur in garages or from punctures from running over objects in the road (but unrelated to a crash), are not within the scope of this request. Also, reports in which the fuel leak or fire originated in the engine compartment area, or where the fire was caused by an electrical issue (e.g., dash wiring or seat heater) or from a non-vehicle related source (e.g., a lit cigarette, or a lit match), as opposed to a fuel leak, are also outside the scope of this request.

- A2. The following summarizes the reports located by Chrysler Group that relate to, or may relate to, the alleged condition in the subject vehicles. Chrysler Group has conducted a reasonable and diligent search of records kept in the ordinary course of business for information responsive to this inquiry.
- a. There are a total of 11 customer complaints (6 unique VINs).
 - b. There are 5 field reports.
 - c. There are 25 reports involving a fire, injury, or fatality.

- d. There are no reports of alleged property damage.
- e. There are no third-party arbitration proceedings.
- f. There are 16 lawsuits and 2 legal claims. 3 of the lawsuits are related to 1 accident. The 2 legal claims also are included in the 11 customer complaints.

ODI sent Chrysler Group 14 VOQs that it believes may be related to this inquiry. 6 of the 14 VOQs reported that the vehicle at issue was struck from the rear by another vehicle and a fire ensued. Chrysler Group notes that 4 of these 6 VOQs relate to lawsuits or customer complaints that are also included in the respective counts for those categories. The remaining 8 VOQs are either unrelated to the alleged defect as defined by NHTSA or provide insufficient information to discern whether they relate to the alleged defect as defined by NHTSA. Enclosure 3 provides Chrysler Group's summary and analysis of the VOQs.

The chart below summarizes the number of reports, by category:

Subject Vehicle Population 2,968,914						
Category Description	Customer Complaints (CAIRs)	Field Reports	Legal Claims	Notices	VOQ's	Total Unique VINS
Fire After Vehicle is Struck from Rear by Another Vehicle	11	5	18	1	6	25
Fuel Leak After Vehicle is Struck from Rear by Another Vehicle With No Fire	0	0	0	0	0	0

With respect to the incidents identified in sub-parts (a), (c), and (f) above, see Enclosure 3 for a summary description of the crashes and Chrysler Group's analysis and supporting back-up materials related to the causal and contributing factors.

- 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. Cause: 1) Whether the alleged defect occurred due to the failure of or damage to a subject component or 2) whether the alleged defect occurred due to an unknown, undetermined, or ambiguous causation.
- d. Vehicle owner or fleet name (and fleet contact person), address, and telephone number;
- e. Vehicle's VIN;
- f. Vehicle's model year;
- g. Vehicle's mileage at time of incident;
- h. Incident date;
- i. Report or claim date;
- j. Whether a fire is alleged;
- k. Whether property damage is alleged;
- l. Number of alleged injuries, if any; and
- m. Number of alleged fatalities, if any.

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

A3. The information requested in Items a. through m. 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. The documents requested specifically include any police reports in Chrysler's possession which relate to, or may relate to, the crash, fuel leak or fire, and any accident reconstruction documents by any party. Organize the documents separately by category (i.e., consumer complaints, field reports, etc.) and describe the method Chrysler used for organizing the documents.

A4. See Enclosure 3, which contains files with copies of the available customer complaints, field reports, legal claims and police reports. All documents are arranged in folders by the claimant name.

7. Produce copies of all documents that relate to, or may relate to, the alleged defect in the subject vehicles, that Chrysler has issued to any dealers, regional or zone offices, field offices, fleet purchasers, or other entities. This includes, but is not limited to, bulletins, advisories, informational documents, training documents, or other documents or communications, with the

exception of standard shop manuals. Also include the latest draft copy of any communication that Chrysler is planning to issue within the next 120 days.

A7. Safety Recall A10 was released in February, 2002 to address approximately 71,000 vehicles which may not comply with the requirements of Federal Motor Vehicle Safety Standard (FMVSS) 301- Fuel System Integrity. Under certain accident conditions, the fuel tank may deform and damage an internal control valve. This could allow fuel leakage to occur if the vehicle rolls over. Fuel leakage in the presence of an ignition source can result in a fire. There have been no other documents that relate to, or may relate to, the alleged defect in the subject vehicles. Chrysler Group has no plans to issue any communication in the next 120 days to customers, dealers, regional or zone offices, field offices, fleet purchasers, or other entities.

See Enclosure 4, which contains a copy of the Safety Recall A10 and the communication to dealers regarding Recall A10.

- 9. Provide information on each unique version of skid guard, brush guard, or other protective guard manufactured, marketed, or sold by Chrysler intended for use with the subject vehicle fuel tank and installed either as original equipment, or available as optional equipment. For each unique version of guard, provide the following information:**
- a. The part number (both service and engineering) of the guard;**
 - b. Whether it was offered as original equipment, optional equipment, or both;**
 - c. A drawing or photograph of the guard;**
 - d. If an optional guard, the date or approximate date on which it was offered for sale;**
 - e. If an optional guard, the model year(s) of vehicles on which it could be installed;**
 - f. If an optional guard, the total number of guards sold, by part number and month of sale;**
 - g. Whether the guard was withdrawn from production and/or sale, and if so, when;**
 - h. Whether the guard can be interchanged with other versions, and if so, the part numbers of the interchangeable guard; and**
 - i. The name and address of the supplier of the guard;**

Also, provide the above information for any new or modified version of the guard that Chrysler is aware of which may be offered for sale within the next 120 days.

A9. a. Enclosure 5 contains a summary of the brush guard and skid plate part numbers.

- b. The information requested in Q9. b. is contained in the A.1d. response of optional equipment sales codes. See Enclosure 1, for volumes.
- c. Enclosure 4 CONF BUS INFO contains a copy of skid plate and brush guard assembly drawings which have been sent to the NHTSA Chief Counsel's Office with a request for confidential treatment.
- d. An optional brush guard was not available on any 1993-2004 Jeep Grand Cherokee vehicles. A brush guard was included as standard equipment for the 1999 – 2004 Jeep Grand Cherokee (WJ) vehicles and a skid plate was offered as optional equipment for all 1993 – 2004 model year Jeep Grand Cherokee vehicles (see A.1 for the optional equipment sales codes and Enclosure 1, for the volumes). MOPAR Accessories offered a skid plate for the 1993 – 2004 Jeep Grand Cherokee vehicles.
- e. See the responses to 9. d. and 1. D above.
- f. See Enclosure 5, for MOPAR Accessories part sales. Due to record retention, the part sales data is only retained for 5 calendar years.
- g. The 1999 – 2004 Jeep Grand Cherokee (WJ) standard brush guard was withdrawn from production between December 14, 2001 and September 4, 2002. During this time period a skid plate was standard equipment. During Jeep Grand Cherokee (WJ) 2003 MY developmental rear crash tests conducted in the 2001 calendar year, a fuel tank leak was discovered from the On-Board Refueling Vapor Recovery System (ORVR) control valve (redesigned for the 2002 MY) in excess of FMVSS 301 requirements. Recall A10 was conducted to repair all affected 2002 MY Jeep Grand Cherokee (WJ) vehicles using a bracket to protect the ORVR control valve. During investigation of the control valve leak it was determined that 2002 Jeep Grand Cherokee (WJ) vehicles with a skid plate did not experience the leak. Although the primary purpose of a skid plate is not to protect the fuel tank in rear end collisions, as an interim measure, the skid plate was made standard for production vehicles during the time period (Dec. 14, 2001 – Sept. 4, 2002) when a reinforced ORVR control valve was being developed. Once the reinforced ORVR control valve and reinforced brush guard began to be used on production Jeep Grand Cherokee's (after Sept. 4, 2002), the skid plate returned to optional equipment.
- h. Refer to the brush guard/skid plate chart located in Enclosure 4, which contains a summary of the brush guard/skid plate part numbers and applicable model years.
- i. The 1993 – 1998 Jeep Grand Cherokee (ZJ) skid plate supplier:

Matcor Automotive Michigan
7299 E Danbro CRE
Mississauga, Ontario L5N6PS

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ATTACHMENT

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The 1999 – 2004 Jeep Grand Cherokee (WJ) skid plate supplier:

Kautex Textron
2701 Kautex Drive
Windsor, Ontario N8W5B-1

Chrysler has no plans for any new or modified version of the guard that may be offered for sale within the next 120 days.