



October 14, 2011

Mr. Frank Borris, Director

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-213cla; EA11-001.03

Dear Mr. Borris:

Attached is Chrysler Group LLC's ("Chrysler") response to the referenced inquiry. By providing the information contained herein, Chrysler is not waiving its claim to attorney work product and attorney-client privileged communications.

Chrysler has conducted a reasonable and diligent search of its data repositories and has identified 87 unique VINs with complaints that may relate to the alleged condition involving fluid leaks from metallic brake lines.

Sincerely,

A handwritten signature in cursive script, appearing to read "David D. Dillon".

David D. Dillon

Attachment and Enclosures

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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 August 9, 2011 the date the information request was received.

- 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. Brake System Type (ABS, Traction Control, Both)**
 - g. Date warranty coverage commenced;**
 - h. 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 2003, or a compatible format, entitled "PRODUCTION DATA."

- A1. The subject peer vehicles for the US market are the 1999 – 2003 model year (MY) Dodge Ram vehicles and referred to as the BR/BE body model for the 1999 to 2001 model years and the DR body model for the 2002 – 2003 model years. The total number of subject peer vehicles manufactured by Chrysler for sale or lease for the US market was 1,996,215.

The detailed response that lists the production data is provided in Enclosure 1 as a Microsoft Access 2010 table titled "PRODUCTION DATA (EA11-001.003)"

- 2. State the number of each of the following, received by Chrysler, or of which Chrysler is otherwise aware, which relate to, the subject condition in the subject peer 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 peer vehicle, property damage claims, consumer complaints, or field reports;**
 - d. Reports involving a fire, based on claims against the manufacturer involving a death or injury, notices received by the manufacturer alleging that a death or injury was caused by a possible defect in a peer vehicle, property damage claims, consumer complaints, or field reports;**
 - e. Property damage claims;**
 - f. Third-party arbitration proceedings where Chrysler is or was a party to the arbitration; and**
 - g. 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, 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 “g,” 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 “f” and “g” 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 following summarizes the reports identified by Chrysler that relate to, or may relate to, the alleged condition in the subject peer vehicles. Chrysler has conducted a reasonable and diligent search of the normal repositories of such information.
- a. There are 90 consumer complaints (Customer Assistance Inquiry Request or CAIR) that may relate to the alleged condition for the subject peer vehicles, which represents 87 unique VINs.
 - b. There are no field reports for the alleged condition in the subject peer vehicles.
 - c. There are 2 reports of the alleged condition resulting in crash, with 1 injury, for the subject peer vehicles.
 - d. There have been no reports of fires or fatalities.
 - e. There are 2 reports of the alleged condition resulting in property damage for the subject peer vehicles.
 - f. There are no third-party arbitration proceedings with Chrysler relating to the alleged condition and the subject peer vehicles.
 - g. There are 2 legal claims involving the subject peer vehicles for the alleged condition.

Based on the analysis of these complaints for the subject peer vehicles, Chrysler has determined that there are a total of 96 field inputs which represent 87 unique VINs. After discussion with ODI, Chrysler has included in its response metallic brake lines that have leaked fluid due to corrosion or for unknown reasons. The vehicles listed in c, e and g represent the same two vehicles. Of the 87 unique

VIN's with complaints of fluid leaks, 43 of them were related to leaks as a result of corrosion.

- 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 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 2003, or a compatible format, entitled "REQUEST NUMBER THREE DATA."

A3. The detailed response that lists the field inputs (there are no field reports) from Request No. 2, as requested in Items a. through m. is provided in Enclosure 3 CONF BUS INFO in a Microsoft Access 2010 table, titled "Request Number Three Data (EA11-001.003) CONF BUS INFO.mdb" which has been submitted under separate cover to the NHTSA Chief Counsel's Office with a request for confidential treatment.

- 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 3 CONF BUS INFO which has been submitted under separate cover to the NHTSA Chief Counsel's Office with a request for confidential treatment. There are no Field Reports and a CAIR summary file has been submitted as EA11-001.003 CAIRS Report.pdf file with the related documents arranged in folders by CAIR number. In addition, a file named EA11-001.003 Legal Summaries.pdf, which contains the 2 legal summaries.

- 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 condition in the subject peer vehicles: warranty claims; extended warranty claims; claims for good will services that were provided; field, zone, or similar adjustments and reimbursements;

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 2003, or a compatible format, entitled "WARRANTY DATA." See Enclosure 1, Data Collection Disc, for a pre-formatted table which provides further details regarding this submission.

- A5. The total number of warranty claims that may relate to the alleged condition, for the subject peer vehicles, is listed in Enclosure 5 CONF BUS INFO in a Microsoft Access 2010 table, titled "WARRANTY DATA (EA11-001.003) CONF BUS INFO.mdb".
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 peer vehicles. State, by make and model year, the terms of the new vehicle warranty coverage offered by Chrysler on the subject peer 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 peer vehicles and state by option, model, and model year, the number of vehicles that are covered under each such extended warranty.**
- A6. The labor operation codes used by Chrysler to identify warranty claims are noted in the charts below.

Description of Repair	Labor Operation
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Tube, Brake Replace, master cylinder to combination valve	05307001
Tube, Brake Replace, combination valve to right front flex hose/junction strip	05307101
Tube, Brake Replace, junction strip to right front flex hose	05307102
Tube, Brake Replace, combination valve to left front flex hose	05307201
Tube, Brake Replace, combination valve to pressure limit valve	05307204
Tube, Brake Replace, pressure limit valve/junction strip to rear flex hose	05307205
Tube, Brake Replace, combination valve to rear flex hose	05307402
Tube, Brake Replace, rear axle tee to rear wheel cylinder/flex hose right or left	05307403
Tube, Brake Replace, combination valve to hydraulic control unit	05307701
Tube, Brake Replace, hydraulic control unit to left front flex hose	05307702
Tube, Brake Replace, hydraulic control unit to right front flex hose/junction strip	05307703

Failure Code	Code Descriptions
65	Leaks

It should be noted that there are no specific failure codes for "corrosion" and the above list is the only failure code that could reasonably be related to the alleged condition. Additionally, not all of the warranty claims are necessarily related to the alleged condition, as there are other reasons for replacing metallic brake tubes. For example, a claim for leak could be due to a joint issue. Therefore, the number of responsive warranty claims may be artificially high with regard to the alleged condition.

The standard warranty coverage offered for both the subject peer vehicles was 36 months / 36,000 miles. Service contract coverage options were available for purchase through Chrysler's authorized dealers which extend coverage on the subject components. Beyond standard warranty coverage, the LOPS shown above are covered by such contracts for the subject peer vehicles. The number of contracts sold by Chrysler for the subject peer vehicles that have extended coverage on the subject components is listed in Enclosure 6 CONF BUS INFO.

Any service contract claims for the applicable labor operation codes are included in the warranty data being provided in response to Question No. 6. Chrysler notes that owners may also have the opportunity to purchase additional service

contract coverage through other third-party providers, but Chrysler does not have access to that data.

- 7. 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, fluid leaks from metallic brake lines in which brake line corrosion was identified as a factor in the subject peer vehicles: warranty claims; extended warranty claims; claims for good will services that were provided; field, zone, or similar adjustments and reimbursements;**

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 2003, or a compatible format, entitled "WARRANTY DATA." See Enclosure 1, Data Collection Disc, for a pre-formatted table which provides further details regarding this submission.

- A7. The total number of warranty claims that may relate to the alleged condition, for the subject peer vehicles, is listed in Enclosure 5 CONF BUS INFO in a Microsoft Access 2010 table, titled "WARRANTY DATA (EA11-001.003) CONF BUS INFO.mdb". The same criterion that was used in question 5 was used in question 7.

- 8. Describe in detail the search criteria used by Chrysler to identify the claims identified in response to Request No. 7, 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 peer vehicles. State, by make and model year, the terms of the new vehicle warranty coverage offered by Chrysler on the subject peer 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 peer vehicles and**

state by option, model, and model year, the number of vehicles that are covered under each such extended warranty.

A8.

Description of Repair	Labor Operation
Tube, Brake Replace, master cylinder to combination valve	05307001
Tube, Brake Replace, combination valve to right front flex hose/junction strip	05307101
Tube, Brake Replace, junction strip to right front flex hose	05307102
Tube, Brake Replace, combination valve to left front flex hose	05307201
Tube, Brake Replace, combination valve to pressure limit valve	05307204
Tube, Brake Replace, pressure limit valve/junction strip to rear flex hose	05307205
Tube, Brake Replace, combination valve to rear flex hose	05307402
Tube, Brake Replace, rear axle tee to rear wheel cylinder/flex hose right or left	05307403
Tube, Brake Replace, combination valve to hydraulic control unit	05307701
Tube, Brake Replace, hydraulic control unit to left front flex hose	05307702
Tube, Brake Replace, hydraulic control unit to right front flex hose/junction strip	05307703

Failure Code	Code Descriptions
65	Leaks

It should be noted that there are no specific failure codes for “corrosion” and the above list is the only failure code that could reasonably be related to the alleged condition. Additionally, not all of the warranty claims are necessarily related to the alleged condition, as there are other reasons for replacing metallic brake tubes. For example, a claim for leak could be due to a joint issue. Therefore, the number of responsive warranty claims may be artificially high with regard to the alleged condition.

The standard warranty coverage offered for both the subject peer vehicles was 36 months / 36,000 miles. Service contract coverage options were available for purchase through Chrysler’s authorized dealers which extend coverage on the subject components. Beyond standard warranty coverage, the LOPS shown above are covered by such contracts for the subject peer vehicles. The number

of contracts sold by Chrysler for the subject peer vehicles that have extended coverage on the subject components is listed in Enclosure 6 CONF BUS INFO.

Any service contract claims for the applicable labor operation codes are included in the warranty data being provided in response to Question No. 6. Chrysler notes that owners may also have the opportunity to purchase additional service contract coverage through other third-party providers, but Chrysler does not have access to that data.

9. Separately, for each model and model year subject peer vehicles, list and describe the composition of the brake lines installed on the subject peer vehicles. The description shall include the materials composition of the brake line beneath the exterior coating(s) on the brake line, including the make(s) or type of coating treatment(s) / paint layer(s), i.e. Galfan, Nygal, applied to the brake lines. Identify (name and address) of the suppliers of the brake lines.

A9. Enclosure 9 CONF BUS INFO, file "1999-2003 Dodge Ram Brake Tube Information.pdf" list the models, model year, brake line part number, part description, base tube material standard, exterior tube coating standard and a description of any exterior tube coating related changes, supplier name and address. Copies of the base tube material standard and exterior tube coating standards can be found in Enclosure 12 CONF BUS INFO.

10. If the make(s) or type(s) of coating treatment(s) / paint layer(s) applied to the brake lines described in the previous question changed during the manufacture of the subject peer vehicle(s), separately, for each model and model year subject peer vehicles, provide a list of changes and a description of the reason(s) why a change was made.

A10. There were no exterior coating changes made to the subject components during each model year.

11. State whether the supplier(s) of the subject components in the subject peer vehicles provided any quality control test reports, lab reports, or reports of a similar nature, analyzing the composition, e.g. "in-melt" analysis of the coating of the subject components, to Chrysler. If so, provide a copy of any report(s).

A11. Any supplier provided quality test reports, lab reports, or reports of a similar nature, analyzing the composition, e.g. "in-melt" analysis of the coating of the subject components, that may have been provided to Chrysler by the supplier is no longer in Chrysler's possession due to Chrysler's document retention policies.

12. Provide a copy of Chrysler's internal standard(s) or specification(s) on line composition and brake line external coating composition, including thickness.

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- A12. Chrysler's internal material and process standards for the subject components are included in Enclosure 12 CONF BUS INFO.
- 13. State Chrysler's specifications, i.e. Vehicle Technical Specifications or VTS, regarding the corrosion resistance of the subject components and its designed life expectancy. Describe the environment for which the specifications are designed. Provide a copy of any specification(s).**
- A13. Chrysler's internal corrosion standards are included in Enclosure 13 CONF BUS INFO.
- 14. Provide the specification contained in the contract, purchase document, or other similar document(s) with the brake line supplier(s) related to:**
- a. the thickness of the brake line(s);**
 - b. the composition of the brake lines;**
 - c. the composition of the brake line coating(s); and**
 - d. the specification related to the corrosion resistance of the brake line(s).**
- A14. Any contracts or purchase documents are no longer in Chrysler's possession due to Chrysler's document retention policies. However, Chrysler's internal material and process standards for the subject components are included in Enclosure 12 CONF BUS INFO.
- 15. Provide a drawing / diagram of the brake line system in the subject peer vehicles that identifies the general layout of the major brake components in relation to the subject peer vehicle.**
- A15. A diagram of the brake line system in the subject peer vehicles that identifies the general layout of the major brake components can be found in Enclosure 15.