



February 23, 2012

Mr. D. Scott Yon, Chief  
Vehicle Integrity Division, NVS-214  
U.S. Department of Transportation

National Highway Traffic Safety Administration (NHTSA)  
Office of Defects Investigation (ODI)  
Room W48-304  
1200 New Jersey Avenue SE  
Washington, D.C. 20590

Reference: NVS-212am; EA11-010

Dear Mr. Yon:

Attached is Chrysler Group LLC's ("Chrysler") response for Questions 1 through 8 and Question 15 of the referenced inquiry. By providing the information contained herein, Chrysler is not waiving its claim to attorney work product and attorney-client privileged communications.

By agreement with ODI, the remaining responses will be submitted on or before March 16, 2012, unless otherwise noted.

Sincerely,

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

David D. Dillon

Attachment and Enclosures

Mr. Frank Borris  
Reference: NVS-212am; EA11-010  
February 23, 2012

ATTACHMENT

Page 1 of 9

**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).

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**Note: Unless indicated otherwise in the response to a question, this document contains information through November 16, 2011, the date the information request was received.**

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Mr. Frank Borris  
Reference: NVS-212am; EA11-010  
February 23, 2012

ATTACHMENT

Page 2 of 9

Please repeat the applicable request verbatim above each response. After Chrysler's response to each request, identify the source of the information and indicate the last date the information was gathered.

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 this information in a Microsoft Access 2007 file, or a compatible format, entitled "PRODUCTION DATA."**

- A1. The subject vehicles for the US market are the 2005 – 2007 model year (MY) Chrysler Town and Country and Dodge Grand Caravan and Caravan vehicles. They are referred to as the body model RS and were built in two assembly plants, Windsor Assembly Plant (WAP) and St. Louis South Assembly Plant (SLSAP). The total number of subject vehicles manufactured by Chrysler for sale or lease in the US market was 1,318,625, broken down by MY as follows:

Model Year	Family	Plant	Market	Volume
2005	RS	St. Louis South	US	242,164
2005	RS	Windsor	US	380,551
			<b>Total US</b>	<b>622,715</b>
Model Year	Family	Plant	Market	Volume
2006	RS	St. Louis South	US	189,695
2006	RS	Windsor	US	222,446
			<b>Total US</b>	<b>412,141</b>
Model Year	Family	Plant	Market	Volume
2007	RS	St. Louis South	US	101,346
2007	RS	Windsor	US	182,423
			<b>Total US</b>	<b>283,769</b>

The detailed response that lists the production data is provided in Enclosure 1 as a Microsoft Access 2010 table titled "PRODUCTION DATA (EA11-010)."

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

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

- A2. The peer vehicles for the US market are the 2004 and 2008 model year (MY) Chrysler Town and Country and Dodge Grand Caravan and Caravan vehicles. They are referred to as the body model RS and RT respectively and were built in two assembly plants, Windsor Assembly Plant (WAP) and St. Louis South Assembly Plant (SLSAP). The total number of peer vehicles manufactured by Chrysler for sale or lease in the US market was 443,472, broken down by MY as follows:

Model Year	Family	Plant	Market	Volume
2004	RS	St. Louis South	US	68,590
2004	RS	Windsor	US	75,084
			<b>Total US</b>	<b>143,674</b>
Model Year	Family	Plant	Market	Volume
2008	RT	St. Louis South	US	73,012
2008	RT	Windsor	US	226,786
			<b>Total US</b>	<b>299,798</b>

The detailed response that lists the production data is provided in Enclosure 2 as a Microsoft Access 2010 table titled "PEER PRODUCTION DATA (EA11-010)."

3. 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:
- Consumer complaints, including those from fleet operators;
  - Field reports, including dealer field reports;
  - 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.**

A3. The following summarizes the reports identified by Chrysler that relate to, or may relate to, the alleged condition in the subject vehicles. Chrysler has conducted a reasonable and diligent search of the normal repositories of such information.

- a. There are 811 consumer complaints (Customer Assistance Inquiry Request or CAIR) that may relate to the alleged condition for the subject vehicles, which represents 709 unique VINs.

	2005 RS	2006 RS	2007 RS	TOTAL
<b>CAIRs</b>	655	121	35	811
<b>Unique VINs</b>	580	99	30	709

- b. There are 1,182 field reports responsive to the alleged condition in the subject vehicles, which represent 1,126 unique VINs.

	2005 RS	2006 RS	2007 RS	TOTAL
<b>Field Reports</b>	879	253	49	1,181
<b>Unique VINs</b>	834	244	48	1,126

- c. There is 1 report alleging crash (involving a car / deer accident), 1 report of a minor, non-crash related injury, and 0 reports of fatality responsive to this inquiry.
- d. There are no reports of the alleged condition resulting in property damage for the subject vehicles.

- e. There is one third-party arbitration proceeding with Chrysler relating to the alleged condition and the subject vehicles.
- f. There are 61 legal claims involving the subject vehicles that are responsive to one or more of the conditions alleged in this investigation. These claims all represent unique VINs. Sixty (60) of these claims are associated with Preliminary Evaluation PE10-022.

Based on the analysis of these complaints, Chrysler has determined that there are a total of 2,053 complaints which represent 1,792 unique VINs.

	2005 RS	2006 RS	2007 RS	TOTAL
<b>Total Complaints</b>	1,594	375	84	2,053
<b>Unique VINs</b>	1,392	329	71	1,792

- 4. Separately, for each item (complaint, report, claim, notice, or matter) within the scope of your response to Request No. 3, state the following information:**
- a. Chrysler's file number or other identifier used;
  - b. The category of the item, as identified in Request No. 3 (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 property damage is alleged;
  - k. Number of alleged injuries, if any; and
  - l. Number of alleged fatalities, if any.

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

- A4. The detailed response that lists the customer complaints and field reports from Request No. 3, as requested in Items a. through l., is provided in Enclosure 3 as a Microsoft Access 2010 table, titled "REQUEST NUMBER THREE DATA (EA11-010).mdb." The legal claim and lawsuit detailed response data associated with Preliminary Evaluation PE10-022 have been previously provided and thus is not included in Enclosure 3.
- 5. Produce copies of all documents related to each item within the scope of Request No. 3. Organize the documents separately by category (i.e., consumer complaints, field reports, etc.) and describe the method Chrysler used for organizing the documents.**

- A5. Copies of all documents within the scope of Request No. 3 are provided in Enclosure 4 - Field Data. The documents are organized by report type: CAIR, Field Report, or Legal Claim. For the customer complaints, the CAIR summaries are submitted in one pdf file and the related documents are arranged in folders by CAIR number. The field reports are submitted in pdf files, indicated by model year. The legal claims are arranged by claimant name. The CAIR, Field Report and Legal Claim documents associated with the Preliminary Evaluation PE10-022 have been previously provided and thus are not included in Enclosure 4.
- 6. 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 condition in the 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 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.**

- A6. The following summarizes the reports identified by Chrysler that relate to, or may relate to, the alleged condition in the peer vehicles. Chrysler has conducted a reasonable and diligent search of the normal repositories of such information.
- a. There are 200 consumer complaints (Customer Assistance Inquiry Request or CAIR) that may relate to the alleged condition for the peer vehicles, which represents 181 unique VINs.

	2004 RS	2008 RT	TOTAL
CAIRs	26	174	200
Unique VINs	26	155	181

- b. There are 252 field reports for the alleged condition in the peer vehicles, which represent 242 unique VINs.

	2004 RS	2008 RT	TOTAL
Field Reports	46	206	252
Unique VINs	46	196	242

- c. There are no reports of the alleged condition resulting in crash, fire, injury or fatality for the peer vehicles.
- d. There are no reports of the alleged condition resulting in property damage for the peer vehicles.
- e. There are no third-party arbitration proceedings with Chrysler relating to the alleged condition and the peer vehicles.
- f. There are no legal claims involving the peer vehicles for the alleged condition.

Based on the analysis of these complaints, Chrysler has determined that there are a total of 452 complaints which represent 404 unique VINs.

	2004 RS	2008 RT	TOTAL
Total Complaints	72	380	452
Unique VINs	72	332	404

7. Separately, for each item (complaint, report, claim, notice, or matter) within the scope of your response to Request No. 6, state the following information:
- Chrysler's file number or other identifier used;
  - The category of the item, as identified in Request No. 6 (i.e., consumer complaint, field report, etc.);
  - Vehicle owner or fleet name (and fleet contact person), address, and telephone number;
  - Vehicle's VIN;
  - Vehicle's make, model and model year;
  - Vehicle's mileage at time of incident;
  - Incident date;
  - Report or claim date;
  - Whether a crash is alleged;
  - Whether property damage is alleged;
  - Number of alleged injuries, if any; and
  - Number of alleged fatalities, if any.



Mr. Frank Borris  
Reference: NVS-212am; EA11-010  
February 23, 2012

ATTACHMENT

Page 8 of 9

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

A7. The detailed response that lists the customer complaints and field reports from Request No. 6, as requested in Items a. through l., is provided in Enclosure 5 as a Microsoft Access 2010 table, titled "REQUEST NUMBER SIX DATA (EA11-010).mdb." There are no legal claims involving the peer vehicles for the alleged condition.

**8. Produce copies of all documents related to each item within the scope of Request No. 6. Organize the documents separately by category (i.e., consumer complaints, field reports, etc.) and describe the method Chrysler used for organizing the documents.**

A8. Copies of all documents within the scope of Request No. 6 are provided in Enclosure 6 - Peer Field Data. The documents are organized by report type: CAIR, Field Report. There are no legal claims involving the subject peer vehicles for the alleged condition. For the customer complaints, the CAIR summaries are submitted in one pdf file and the related documents are arranged in folders by CAIR number. The field reports are submitted in pdf files, indicated by model year.

Mr. Frank Borris  
Reference: NVS-212am; EA11-010  
February 23, 2012

ATTACHMENT

Page 9 of 9

**15. Produce copies of all service, warranty, and other documents that relate to, or may relate to, the alleged defect in the subject vehicles, that Chrysler has issued to any dealers, regional or zone offices, field offices, fleet purchasers, or other entities. This includes, but is not limited to, bulletins, advisories, informational documents, training documents, or other documents or communications, with the exception of standard shop manuals. Also include the latest draft copy of any communication that Chrysler is planning to issue within the next 120 days.**

A15. Full versions of these documents are included in Enclosure 10 - Dealer Communications.

There are no related dealer communications planned to be released in the next 120 days.