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**INFORMATION Redacted PURSUANT TO THE FREEDOM OF  
INFORMATION ACT (FOIA), 5 U.S.C. 552(B)(6)**

November 11, 2011

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-212pco; PE11-035

Dear Mr. Yon:

Attached is Chrysler Group LLC's ("Chrysler") response for questions 1 – 6 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.

Pursuant to the previous agreement with Mr. Peter Ong (November 3, 2011), Chrysler would submit the response to questions 1 – 6 by November 11, 2011. That agreement also allowed the final response to questions 7 – 13 to be received by your office by December 9, 2011.

I would like to note that part of the response to question 6 includes a document that contains confidential business information. This document, concerning Service Contracts, will be supplied with additional confidential business information and with the final response to questions 7 – 13 on December 9, 2011.

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).

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**Note: Unless indicated otherwise in the response to a question, this document contains information through Oct 4, 2011, the date the information request was received.**

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**1. State within the body of the response letter a summary table, by make, 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 (in “yyyy/mm/dd” 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 detailed information in Microsoft Access 2007, or a compatible format, entitled “Q1\_PRODDATA.accdb” Multiple model vehicle data can be provided in separate tables within a single database file providing that the overall file size does not exceed 1GB.**

A1. The following summary table identifies the production data for all 2002 – 2004 MY Jeep Liberty vehicles manufactured for sale or lease in the United States (US).

<u>MY/MAKE/MODEL/(BODY)</u>	<u>VOLUME</u>
2002 Jeep Liberty (KJ)	208,710
2003 Jeep Liberty (KJ)	178,163
2004 Jeep Liberty (KJ)	173,724

The detailed response that lists the production data is provided in Enclosure 1 – Production Data, as a Microsoft Access 2000 table titled “PRODUCTION DATA (PE11-035)”.

**2. State the number of each of the following reports, 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 fire, 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 “f” state within the body of the response letter a summary table containing the total number of each item (e.g., a. consumer complaints, b. 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 “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. The following tables summarize the reports identified by Chrysler that relate to, or may relate to, the alleged defects in the subject vehicles. Chrysler has conducted a reasonable and diligent search of the normal repositories of such information. Additionally, Vehicle Inspection Field Reports are also included in the related documents associated with the CAIR Reports.

TABLE 1

- No Fire, Crash, Property Damage, or Fatality claims are associated with Table 1.
- There was no 3<sup>rd</sup> party arbitration associated with Table 1.
- There were 48 injuries, involving 46 VINs, associated with Table 1 (25-2002, 23-2003).

Alleged Defect: Relates to or <u>may relate to</u> the inadvertent deployment of a frontal air bag or air bags (without a crash/impact).					
MY/MODEL/BODY	CAIR	FIELD RPT	LEGAL	TOTAL	VINS UNIQUE
2002 Jeep Liberty (KJ)	53	0	15	68	43
2003 Jeep Liberty (KJ)	43	0	17	60	41
2004 Jeep Liberty (KJ)	0	0	0	0	0

TABLE 2

- No Fire, Crash, Property Damage, Injury, or Fatality claims are associated with Table 2.
- There was no 3<sup>rd</sup> party arbitration associated with Table 2.
- Of the 104 claims associated with Table 2, 75 are classified as “Unsure”, 29 as “Yes”.

Alleged Defect: Relates to or <u>may relate to</u> the illumination of the air bag light indicating a faulty ACM/wiring that can lead to an inadvertent deployment of the frontal air bag or air bags.					
MY/MODEL/BODY	CAIR	FIELD RPT	LEGAL	VINS TOTAL	VINS UNIQUE
2002 Jeep Liberty (KJ)	55	2	1	58	54
2003 Jeep Liberty (KJ)	33	0	0	33	28
2004 Jeep Liberty (KJ)	13	0	0	13	10

- 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., a. consumer complaint, b. field report, f. lawsuits 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 (in "yyyy/mm/dd" date format);**
  - h. Report or claim date (in "yyyy/mm/dd" date format);**
  - i. Whether a fire or 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 Microsoft Access 2007, or a compatible format, entitled "Q3\_ORDATA.accdb." Multiple model vehicle data can be provided in separate tables within a single database file providing that the overall file size does not exceed 1GB.**

A3. The detailed response that lists the customer complaints, field reports, legal claims, and lawsuits from Request No. 2, as requested in Items a. through l. is provided in Enclosure 3 – Request Number Two Data, in a Microsoft Access 2000 table titled "Q3\_ORDATA (PE11-035)".

- 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., a. consumer complaints, b. field reports, f. lawsuits etc.) and describe the method Chrysler used for organizing the documents.**

A4. Copies of all documents within the scope of Request 2 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 arranged by VIN number. Additionally, Vehicle Inspection Field Reports are also included in the related documents associated with the CAIR Reports. The Legal Claims are arranged in folders by claimant name.

- 5. State within the body of the response letter a summary table, by model and model year, a total count for each 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**

**including field, zone, or similar adjustments and reimbursements; or a 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 (in "yyyy/mm/dd" date format);**
- 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.**

**Multiple repairs involving the same vehicle are to be counted separately, but duplicate repair claims are not to be included. If desired, the warranty claim can be tagged as a "duplicate to an owner report" in the summary table and in the data file.**

**Provide the detailed information in Microsoft Access 2007, or a compatible format, entitled "Q5\_WRNTYDATA.accdb." Multiple model vehicle data can be provided in separate tables within a single database file providing that the overall file size does not exceed 1GB.**

- A5. This table includes all paid claims for all subject component part replacements related to the failure code conditions listed in response to Question #6. These claims are not all necessarily related to the alleged defects as there are other reasons for replacing the Air Bag / Occupant Restraint Control Module, aside from the alleged defects. For instance, in addition to supporting the driver and passenger frontal airbag circuits, the subject component also supports functions for driver & passenger seat belt pretensioners, the passenger occupant classification system, and the inflatable knee bolster (if so equipped). Therefore, the number of warranty claims shown here may be artificially high and unrelated to the alleged defect. Thus, Chrysler has not drawn conclusions regarding trends for the alleged defects based on warranty data alone.

The warranty claims are itemized by labor operation codes below:

MY / Model / Body	ORC Claims	LOP Code
2002 Jeep Liberty	543	08450901
2003 Jeep Liberty	268	08450901
2004 Jeep Liberty	173	08450901

Labor Operation (LOP) Code
08450901 – Module, Air Bag/Occupant Restraint Control - Replace

The detailed response that lists the warranty claims is provided in Enclosure 5 - Warranty Data, in a Microsoft Access 2000 table titled "WARRANTY DATA (PE11-035)".

**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 option(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 reported in the response to Request No. 5 can be found in the charts below:

Labor Operation (LOP) Code
08450901 – Module, Air Bag/Occupant Restraint Control - Replace

Failure Code	Code Descriptions
11	Broken or Cracked
58	Circuit Open
61	Intermittent Operation
SE	Shortage Part
UC	Uncodeable

The standard warranty offered on the subject vehicles was 36 months / 36,000 miles. There was no extended warranty coverage for the subject components, but there were service contract coverage options available for purchase through Chrysler's authorized dealers which extend coverage on the subject components. Beyond standard warranty coverage, Module, Occupant Restraint Control claims (LOP 08450901) are covered by any "Maximum Care" option or the "Certified Pre-Own Vehicle Maximum Care" (CPOV) option. The Maximum Care option coverage choices range from 36 months / 45,000 miles to lifetime unlimited mileage and the CPOV option covers claims for the subject components for the 1st 3 months / 3,000 miles.

The total number of subject vehicles that are or have been covered by one of the service contract plans is listed in Enclosure 6 – Extended Service Contracts Conf Bus Info which will be submitted under separate cover to the NHTSA Chief Counsel's Office with a request for confidential treatment. The final response, due December 9, 2011, will contain this confidential information.

Mr. Peter Ong  
Reference: NVS-212pco; PE11-035  
November 4, 2011

ATTACHMENT

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Any service contract claims for the applicable labor operation codes are included in the warranty data being provided in response to Question 5. 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.

A7. – A13.

By agreement with ODI, the responses to these questions will be submitted on December 9, 2011.