



2 October 2012

Mr Frank S. Borris II, Director
Office of Defects Investigation
National Highway Traffic Safety Administration
1200 New Jersey Avenue, SE/W45-302
Washington, DC 20590

Dear Mr. Borris:

Subject: EA12-001: NVS-212-pco

This is Jaguar Land Rover North America, LLC's response ("Jaguar Land Rover") to the agency's August 9, 2012 letter concerning reports of alleged inadvertent or non-crash related air bag deployments in certain model year 2002-2003 Jeep Liberty vehicles manufactured by Chrysler Group LLC.

Answers to your specific questions are set forth below. As requested, after each numeric designation, we have set forth verbatim the request for information, followed by our response. Unless otherwise stated, Jaguar Land Rover has undertaken to provide responsive documents dated up to and including August 9, 2012, the date of your inquiry. Jaguar Land Rover has searched within the following Jaguar Land Rover offices for responsive documents: Automotive Safety & Compliance Office, Marketing Sales and Service, Office of the General Counsel, and Product Development.

Sincerely,

John M. Kobylarz
Safety Compliance Manager
Jaguar Land Rover North America, LLC

Request 1

1. State within the body of the response letter a summary table, by make, model and model year, the number of subject peer vehicles Jaguar and Land Rover has manufactured for sale or lease in the United States. Separately, for each model subject peer vehicle manufactured to date by Jaguar and Land Rover, 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);
- g. The State in the United States where the vehicle was originally sold or leased (or delivered for sale or lease);
- h. Total number of air bags and seat belt pre-tensioners;
- i. If equipped with seat belt pre-tensioners;
- j. If equipped with side-impact air bags; and
- k. If equipped with side head curtain air bags.

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.

Answer

Records indicate that the total number of Jaguar Land Rover subject peer vehicles sold in the United States (the 50 states and the District of Columbia) and its protectorates and territories (American Samoa, Guam, Northern Mariana Islands, Puerto Rico and Virgin Islands) is 75707.

Please find below a summary table which contains by make, model and model year, the number of subject peer vehicles Jaguar and Land Rover has manufactured for sale or lease in the United States.

Make	Model	Model Year	Volume
Land Rover	Discovery Series II	2001	733
		2002	14093
		2003	23036
		2004	15892
	Ranger Rover	2001	737
		2002	3927
Jaguar	XJ	2000	1
		2001	4499
		2002	6267
		2003	6522

Table 1: Summary Table of Subject Peer Vehicles

Please find attached on CDROM a file entitled "Q1_PRODDATA.accdb" containing Jaguar Land Rovers data on all subject peer vehicles manufactured for sale or lease in the United States as requested above. Please note that within the Land Rover Discovery II table there are 7 blank entries in the date warranty coverage commenced column as these are unknown to Jaguar Land Rover.

Request 2

2. State the number of each of the following reports, received by Jaguar and Land Rover, or of which Jaguar and Land Rover is otherwise aware, which relate to, or may 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 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 subject condition or defect in a subject peer vehicle, property damage claims, consumer complaints, or field reports;
- d. Property damage claims;
- e. Third-party arbitration proceedings where Jaguar and Land Rover is or was a party to the arbitration; and
- f. Lawsuits, both pending and closed, in which Jaguar and Land Rover 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 Jaguar and Land Rover'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.

Answer

For all subparts, "a-f" above Jaguar Land Rover has no reports or incidents to declare.

Request 3

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. Jaguar and Land Rover'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; and
- m. Specify which air bag device(s) had deployed (i.e. Drv 1, Drv 2, Pass1, Pass2, Drv Side, Pass Side, Drv Curtain, Pass Curtain, Drv SB and/or Pass SB as applicable).

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.

Answer

As Jaguar Land Rover has no reports or incidents declared in Request 2, Jaguar Land Rover has no further information to provide for subparts "a-m" as listed above.

Request 4

4. Produce copies of all documents related to each item within the scope of Request No. 2.
2. Organize the documents separately by category (i.e., a. consumer complaints, b. field reports, f. lawsuits etc.) and describe the method Jaguar and Land Rover used for organizing the documents.

Answer

Jaguar Land Rover has no documents related to Request 2 as there are no reported incidents.

Request 5

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 Jaguar and Land Rover to date that relate to, or may relate to, the subject 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; 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. Jaguar and Land Rover'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.

Count as a separate claim each repair/incident assigned a separate claim/report number, even if a single vehicle is involved. Count as a single claim any duplicative claims assigned the same claim/report number.
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.

Answer

For all subparts "a-k" above, Jaguar Land Rover has no claims to declare.

Request 6

6. Describe in detail the search criteria used by Jaguar and Land Rover to identify the items identified in response to Request No. 3, 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 subject condition in the subject peer vehicles. State, by make and model year, the terms of the new vehicle warranty coverage offered by Jaguar and Land Rover 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) and if it covers inadvertent side-airbag deployments (without an actual side crash, but sensors did sense a shock pulse). Describe any extended warranty coverage option(s) that Jaguar and Land Rover 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 and if it covers inadvertent side-airbag deployments.

Answer

As Jaguar Land Rover has no reports or incidents declared in Request 3, this request is not applicable to Jaguar Land Rover.

Request 7

7. Separately, for each model and model year of the subject peer vehicles, provide the manufacturer short and long nomenclature/name for the electronic air bag module (i.e. RCM/Restraint Control Model etc...), the module part number including revision number (Jaguar and Land Rover and TRW numbers), when it was put into production service (mm/yy), and what air bag system devices (i.e. frontal, side-impact, head curtain and/or seat belt pre-tensioners) the module can deploy.

Answer

Please find below Table 2 containing details of the electronic air bag modules used in production of the Jaguar and Land Rover subject peer vehicles including name, module part number and production service dates.

Make	Model	Model Year	Name of Air Bag Module	JLR Module Part Number	TRW Module Part Number	Introduction into Service Date	Module can deploy
Land Rover	Discovery Series II	2001 -2004	Diagnostic and control unit (DCU)	YWC106600	202862-110(c)	05/01	Frontal air bags and seat belt pre-tensioners
	Ranger Rover	2001/ 2002	Diagnostic and control unit (DCU)	YWC106890	203992-104	02/01	Frontal, side-impact air bags and seat belt pre-tensioners
Jaguar	XJ	2000 -2003	Airbag/SRS single point sensor (SPS)	HNC9666AD HNC9666AE	150195-104 205256-101	01/01	Frontal, side-impact air bags and seat belt pre-tensioners

Table 2: Summary Table of Air Bag Module Details

Request 8

8. Furnish Jaguar and Land Rover's assessment of the alleged problem condition in the subject peer vehicle(s), 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; and
- e. What warnings (both visually and audibly), if any, the operator would have that the alleged defect or problem condition was occurring or about to occur, or that the subject component was malfunctioning (does the air bag light illuminate intermittently or in a constant ON mode).

Answer

For all subparts "a-e" above, Jaguar Land Rover has no assessments to declare.

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