



February 18, 2013

Mr. Frank Borris, II 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-212-pco; EA12-005

Dear Mr. Borris:

Attached is Chrysler Group LLC's response to EA12-005 Peer Review information request. In performing the information request, Chrysler Group LLC is not waiving its claim to attorney work product and attorney-client privileged communications.

Sincerely,


Reginald Modlin

Attachment and Enclosures

cc: Scott Yon (all via email without Enclosures)
Peter Ong

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 December 21, 2012, the date the information request was received.

1. **State within the body of the response letter a summary table, by make, model and model year, the number of subject peer vehicles Chrysler has manufactured for sale or lease in the United States. Separately, for each model subject peer vehicle manufactured to date by Chrysler, state the following:**
 - a. **Vehicle identification number (VIN);**
 - b. **Model;**
 - c. **Model year;**
 - d. **Date of manufacture (in “dd/mm/yyyy” date format);**
 - e. **Date warranty coverage commenced (in “dd/mm/yyyy” date format);**
 - f. **The State in the United States where the vehicle was originally sold or leased (or delivered for sale or lease);**
 - g. **The stowed location (e.g., in the rear cargo area, below the cargo area floor, or mounted on the exterior of the rear door, or other location) of the OE supplied spare tire;**
 - h. **Whether the vehicle was manufactured with a brush guard, skid guard/plate, or other covering for the underside of the fuel tank (i.e., a protective guard);**
 - i. **Whether the vehicle was manufactured with a tow hitch or tow receiver, and if so the duty/class of the hitch or receiver, and**
 - j. **Whether the vehicle was manufactured with an electrical harness/connector for trailer lighting purposes.**

Provide the table in Microsoft Access 2007, or a compatible format, entitled “SUBJECT PEER VEHICLE PRODUCTION DATA.”

- A1. The detailed response listing the production data as requested in subparts (a) through (j) is provided in Enclosure 1 as a Microsoft Access 2007 table, titled “SUBJECT VEHICLE PRODUCTION DATA.”

Below are explanatory notes on some of the subparts in this request. Moreover, for reasons discussed below, Chrysler Group LLC is also providing additional data and information beyond the scope of what has been requested in Q1.

Note: Chrysler Corporation did not produce a Wrangler vehicle in the 1996 model year.

Inclusion of 1987 through 1992 Jeep Wrangler (YJ) Vehicle Information

Chrysler Group notes that one of the Subject Peer Vehicles has been defined as the 1993 – 1995 Jeep Wrangler (YJ). This Subject Peer Vehicle, however, was the continuation of a vehicle line – the YJ body – that originated in the 1987 model year and, through the 1995 model year, was designed and assembled by American Motors and Chrysler Corporation. Therefore, 1987 – 1992 Wrangler (YJ) has been added to the information provided in answers to this request.

Subparts A-F – Build/Sales Information by VIN

Chrysler Group is also currently searching for the available VIN-based build and sales information for the 1987 - 1992 Jeep Wrangler (YJ) vehicles. This information may have been stored on historical archive back-up media and efforts are underway to restore this data to a useable format, if found. Chrysler Group will supplement this response and produce an additional Enclosure 1 Microsoft Access 2007 table to include the available VIN-based build and sales information for the 1987 - 1992 Jeep Wrangler (YJ) vehicles if found.

Subpart G – Spare Tire Location and Size

The stowed location of the spare tire in the Subject Peer Vehicles is as follows:

1987 - 1995 Jeep Wrangler (YJ): Vertically affixed to rear gate tire carrier.

1997 - 2006 Jeep Wrangler (TJ): Vertically affixed to rear gate tire carrier.

2007 - 2010 Jeep Wrangler (JK): Vertically affixed to rear gate tire carrier.

2005 - 2010 Jeep Grand Cherokee (WK): Stowed in the rear of vehicle horizontally underneath the body.

2008 - 2010 Jeep Liberty (KK): Stowed in the rear of vehicle horizontally underneath the body.

2006 - 2010 Commander (XK): Stowed in the rear of vehicle horizontally underneath the body.

Subpart H – Fuel Tank Guards

Chrysler Group notes that a fuel tank skid plate is an off-road driving accessory that is typically offered on sport utility vehicles. 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 standard on all Subject Peer Vehicles except Wrangler YJ/TJ/JK, which included a skid plate as standard equipment. The optional skid plate part numbers are provided in Enclosure 4. Brush guards are thinner than skid plates 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.

Optional skid plates for the Subject Peer Vehicles are identified in Enclosure 1 by the following sales codes:

XEE: Fuel Tank Skid Plate

Subparts I and J – Tow Hitches/Wiring Harnesses

The Subject Peer Vehicles equipped with an optional trailer tow and/or wiring harness package are identified in Enclosure 1 by the following sales codes:

AHT: Trailer Tow Class IV
AHX: Trailer Tow Class IV
XFH: Trailer Tow Class IV
XFJ: Trailer Tow Class III

Note: The above hitch sales codes are packaged within the trailer tow group which includes the hitch, the wiring, and heavy duty engine cooler with auxiliary oil cooler for the automatic transmission.

XFK: Wiring Harness – 7 Pin Connector
XEY: Trailer Tow Wiring Harness
AHC: Trailer Tow Group

Note: The attached Microsoft Access table located in Enclosure 1 includes a check mark, if the vehicle was packaged with one of the above wiring sales codes.

Summary of Production Volumes

The data table below list the production volumes for the Subject Peer Vehicles manufactured for sale or lease in the United States:

Vehicle Type	MY Total
1993 - 1995 Jeep Wrangler (YJ)	231,957
1997 – 2006 Jeep Wrangler (TJ)	841,836
2007 – 2010 Wrangler (JK)	389,020
2005 – 2010 Grand Cherokee (WK)	665,621
2008 – 2010 Liberty (KK)	170,312
2006 – 2010 Commander (XK)	220,531
Total Vehicle Volume	2,519,277

The production volume for the 1987 - 1992 Wrangler (YJ) vehicles totaled 274,595.

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 subject condition in the subject peer vehicles:**
 - a. **Consumer complaints;**
 - b. **Field reports, including dealer field reports;**
 - c. **Reports involving a crash, or fire, 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 peer 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 “f” 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 including any and all photographic evidence, third-party post-crash/inspection reports, deposition materials, etc. 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 peer vehicle was struck in the rear by another vehicle, or the subject peer vehicle itself, through its own momentum or movement, struck another vehicle or object, such as a tree, pole, or bridge abutment. As used here, the term rear includes crashes in which the subject peer vehicle is struck by another vehicle, or strikes an object, at an angle that included the rear of the vehicle (i.e., clock points 5, 6, or 7), and is not limited to direct crashes to the rear of the subject peer 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 crash related fuel leak and fire, 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 Peer 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 3 customer complaints involving the 1993-2006 Jeep Wrangler (YJ/TJ). There are no customer complaints involving the 2008-2010 Jeep Wrangler (JK), the 2008-2010 Jeep Commander (XK), the 2005-2010 Jeep Grand Cherokee (WK), or the 2008-2010 Jeep Liberty (KK).
- b. There are a total of 2 field reports involving the 1993 through 2006 Jeep Wrangler (YJ/TJ). There are no field reports involving the 2008-2010 Jeep Wranglers (JK), the 2008-2010 Jeep Commander (XK), the 2005-2010 Jeep Grand Cherokee (WK), or the 2008-2010 Jeep Liberty (KK).
- c. There are 7 unique reports of fuel leak or fire involving the 1993 through 2006 Jeep Wrangler (YJ/TJ). There are no reports of fuel leak or fire involving the 2008-2010 Jeep Wrangler (JK), the 2008-2010 Jeep Commander (XK), the 2005-2010 Jeep Grand Cherokee (WK), or the 2008-2010 Jeep Liberty (KK).
- d. There are no reports of alleged property damage involving any of the Subject Peer Vehicles.
- e. There are no third-party arbitrations involving any of the Subject Peer Vehicles.
- f. There are 4 lawsuits (involving 2 unique VINs) and 1 legal claim involving the 1993 through 2006 Jeep Wrangler (YJ/TJ). There are no lawsuits or claims involving the 2008-2010 Jeep Wrangler (JK), the 2008-2010 Jeep Commander (XK), the 2005-2010 Jeep Grand Cherokee (WK), or the 2008-2010 Jeep Liberty (KK).

The chart below summarizes the number of reports located by Chrysler Group that relate to the Subject Peer Vehicles, by category:

Subject Peer Vehicles Population 2,519,277					
Category Description	Customer Complaints (CAIRs)	Field Reports	Lawsuits and Claims	Notices	Total Unique VINs
Fire After Vehicle is Struck from Rear by Another Vehicle	2	1	5	1	6
Fuel Leak After Vehicle is Struck from Rear by Another Vehicle with No Fire	1	1	0	0	1

One of the Subject Peer Vehicles has been defined as the 1993-1995 Jeep Wrangler. As noted by Chrysler Group in its response to Q1, this Subject Peer Vehicle was the continuation of a vehicle line that originated in the 1987 model year. The following summarizes the reports located by Chrysler Group that relate to, or may relate to, the alleged condition in the 1987-1992 Jeep Wrangler (YJ). 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 no customer complaints.
- b. There are no field reports.
- c. There are 2 reports involving fuel leak or fire.
- d. There is 1 report of alleged property damage.
- e. There are no third-party arbitrations.
- f. There are 2 lawsuits (involving 2 unique VINs) and no legal claims.

The chart below summarizes the number of reports located by Chrysler Group that relate to the 1987-1992 Jeep Wrangler (YJ), by category:

1987-1992 Jeep Wrangler (YJ) Population 274,595					
Category Description	Customer Complaints (CAIRs)	Field Reports	Lawsuits and Claims	Notices	Total Unique VINs
Fire After Vehicle is Struck from Rear by Another Vehicle	0	0	2	0	2
Fuel Leak After Vehicle is Struck from Rear by Another Vehicle with No Fire	0	0	0	0	0

With respect to the incidents identified in subparts (a), (c), and (f), see Enclosure 3 for summary descriptions of the crashes involving both the Subject Peer Vehicles and the 1987-1992 Jeep Wrangler (YJ). Supporting back-up materials related to the causal and contributing factors for these incidents are included in Enclosure 3 to this submission.

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 subject condition occurred due to the failure of or damage to a subject component or 2) Chrysler's assessment of the cause of the fire or fuel leak, or 3) whether the subject condition 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;**

- g. Vehicle's model year;**
- h. Vehicle's mileage at time of incident;**
- i. Chrysler's estimate of the impact speed of the striking vehicle or object that contacted the rear of the subject peer vehicle;**
- j. The basis and/or analysis that substantiates the estimate provided in item i;**
- k. Incident date;**
- l. Report or claim date;**
- m. Whether a fire is alleged;**
- n. Whether property damage is alleged;**
- o. Number of alleged injuries, if any; and**
- p. 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 (p) is provided in the detailed response to Q2, Enclosure 2, as part of a Microsoft Access 2007 table, and titled "REQUEST NUMBER TWO DATA." In addition, Chrysler Group is providing the information in items (a) through (p) for the 1987 - 1992 Jeep Wrangler (YJ) as part of the Microsoft Access 2007 table.

As noted above, in response to Q2 Chrysler Group is providing summary descriptions of additional incidents and available supporting back-up materials in Enclosure 3 to this submission. Enclosure 3 also includes the following:

- Summary of Q2 Inputs Related to EA12-005 Subject Peer Vehicles.
- Summary of Q2 Inputs Related to EA12-005 1987 – 1992 Wrangler (YJ) vehicles.

- 4. Produce copies of all documents related to each item within the scope of Request No. 2. The documents requested specifically include, but are not limited to, the following:**
- a. Any police reports relating to, or that may relate to, the crash, fuel leak or fire;**
 - b. Any and all accident reconstruction reports and documents prepared by or for Chrysler or by or for any other party;**
 - c. Any and all reports and exhibits related to the subject condition prepared by expert witnesses in support of a claim against Chrysler or in anticipation of testimony in any state or federal proceeding in which Chrysler was a party;**

- d. Transcripts and/or video recordings and exhibits of any and all depositions of persons designated as experts in any state or Federal proceeding related the subject condition in which Chrysler was a party;**
 - e. Transcripts and/or video recordings of any and all depositions of Chrysler employees in any state or Federal proceeding relating to the subject condition in which Chrysler was a party; and**
 - f. Any and all documents consulted, created, or relied upon by Chrysler supporting its characterization or conclusions related to the causation of any fuel related leak and/or fire related to the subject condition.**

- A4. See Enclosure 3 for available documents responsive to subparts (a) through (f). All documents are arranged in folders by the claimant name.

- 5. **For each subject peer vehicle model and model year, provide the following:**
 - a. Model, model year, and platform designation;**
 - b. Type of material the fuel tank is composed of (e.g., HDPE plastic);**
 - c. Side, rear, and top view drawings showing the placement of the subject components and related components that secure them in the vehicle;**
 - d. A bottom view drawing or photograph showing the full vehicle undercarriage in the fully built configuration including the locations of the subject components.**
 - e. Overall length of vehicle (in/cm);**
 - f. Wheel base (in/cm);**
 - g. Track width (in/cm);**
 - h. Curb weight (lb/kg);**
 - i. Gross vehicle weight rating (lb/kg);**
 - j. Front gross axle weight rating (lb/kg);**
 - k. Rear gross axle weight rating (lb/kg);**
 - l. Interior volume (passenger and storage area);**
 - m. For any subject peer vehicles manufactured with a fuel tank located behind the rearmost axle, state the horizontal distance (in/cm) from aft most point of the rear axle to forward most point of the fuel tank;**
 - n. For any subject peer vehicles manufactured with a fuel tank located behind the rearmost axle, state the horizontal distance (in/cm) from aft most point of the fuel tank to the aft most point of the vehicle's rear bumper;**
 - o. For any subject peer vehicles manufactured with a fuel tank located behind the rearmost axle, state the vertical distance (in/cm) from bottom/lower most surface of the fuel tank to bottom/lower most surface of vehicle's rear bumper at center line position (positive value indicates the tank surface is above bumper, negative value below the bumper);**

- p. For any subject peer vehicles manufactured with a fuel tank located behind the rearmost axle, state the vertical distance (in/cm) from the ground/road surface to the bottom/lower surface of i) the vehicle's rear bumper at center line position, and ii) the vehicle's tow hitch at center line position (when equipped with a tow hitch);**
 - q. If not originally equipped with, whether or not a protective guard for the fuel tank was optionally available, and if so, the part number of the optionally available protective guard; and**
 - r. Whether the vehicle was equipped with an ORVR/Onboard Refueling Vapor Recovery system.**
- A5. Chrysler Group has searched for and reviewed the available historical records for the Subject Peer Vehicles and 1987 – 1992 Wrangler (YJ) vehicles. Some of the information sought by this request dates back to activities that occurred nearly 26 years ago. Records that memorialize each design variation of the Subject Peer Vehicles are incomplete due to the applicable document retention requirements. Nevertheless, Chrysler Group has conducted a diligent search of the available historical records for the information sought in this request. Chrysler Group has also interviewed its current employees who have knowledge about the information sought in this request.

Subparts A-B:

Enclosure 4 – Skid Plate, ORVR and Fuel Tank Summary chart includes fuel tank material information.

Sub Parts C - D

The following is also being provided for the Subject Peer Vehicles and 1987 – 1992 Wrangler (YJ) vehicles:

Enclosure 5B – Subject Peer Vehicle Graphics Conf Bus Info, which has been submitted under separate cover to NHTSA's Chief Counsel with a request for confidential treatment. The graphics in this enclosure depict the fuel system components in relation to each other as well as their placement. Also, the compliance test videos/photos in Enclosure 6 depict the underbody views of the fuel system components.

Subparts E-L:

The dimensional, weight and axle weight rating information sought in these subparts for all Subject Peer Vehicles is contained in Enclosure 5A - Subject Peer Vehicle Weights and Measurements. For reasons stated elsewhere in this response, Chrysler Group has included responsive information relating to the 1987 - 1992 Jeep Wrangler (YJ) vehicles, which is also included in Enclosure 5A. The information contained in Enclosure 5A was obtained from the available sales and other vehicle build literature that was published by the manufacturers.

Subparts M-P:

The measurement information sought in these subparts for all Subject Peer Vehicles is contained in Enclosure 5C - Subject Peer Vehicle Component Proximity Measurements. For reasons stated elsewhere in this response, Chrysler Group has included responsive information relating to the 1987 - 1992 Jeep Wrangler (YJ) vehicles, which is also included in Enclosure 5A. The measurements in Enclosure 5A were obtained by actually measuring representative exemplar vehicles and through CAD (Computer Aided Design).

Subpart Q:

The information sought in this subpart is contained in Enclosure - 4 Subject Vehicle Skid Plate and Fuel Tank Summary, as well as in response to Q1, subpart (h), above. For reasons stated elsewhere in this response, Chrysler Group has included responsive information relating to the 1987 - 1992 Jeep Wrangler (YJ) vehicles, which is also included in Enclosure 4 and in response to Q1, subpart (h), above.

Subpart R:

The information is contained in Enclosure 4 - Skid Plate, ORVR and Fuel Tank Summary.

For reasons stated elsewhere in this response, Chrysler Group has included responsive information relating to the 1987 - 1992 Jeep Wrangler (YJ) vehicles. These vehicles were not equipped with an ORVR system.

- 6. Describe all assessments, analyses, tests, test results, design studies, studies, surveys, simulations, investigations, inquiries and/or evaluations (collectively, “actions”) that relate to, or may relate to, the subject condition in the subject peer vehicles, and including all testing to Federal Motor Vehicle Safety Standard (FMVSS) No. 301 or any other contemplated or applicable corporate or internal fuel system integrity standards that have been conducted, are being conducted, are planned, or are being planned by, or for, Chrysler. For each such action, provide the following information:**
- a. Action title or identifier;**
 - b. The actual or planned start date;**
 - c. The actual or expected end date;**
 - d. Brief summary of the subject and objective of the action;**
 - e. Results and related documents for FMVSS 301 testing including video and photos;**
 - f. Engineering group(s)/supplier(s) responsible for designing and for conducting the action; and**
 - g. A brief summary of the findings and/or conclusions resulting from the action.**

For each action identified, provide copies of all documents related to the action, regardless of whether the documents are in interim, draft, or final form. Organize the documents chronologically by action.

Provide copies of any and all internal or corporate fuel system integrity standards used by Chrysler in the design and development of the subject vehicles that relate to the subject condition or to fuel system crash integrity in general, including those that exceed the requirements of federal standards or FMVSS 301.

A.6 The following documents and information were determined to be responsive to this request:

A. Rear Impact 301 Testing

Chrysler Group has searched the available historical records and identified what is believed to be a complete collection of full-vehicle dynamic rear impact testing that was used to evaluate the fuel system integrity for the Subject Peer Vehicles. For reasons stated elsewhere in this response, Chrysler Group believes it is necessary to also provide information relating to the 1987 - 1992 Jeep Wrangler (YJ) vehicles. Also included in this collection is the applicable FMVSS 301 compliance documentation for these vehicles. The crash test documentation relating to the

Mr. Frank S. Borris, II
Reference: NVS-212po; EA12-005
February 18, 2013

ATTACHMENT

Page 15 of 15

FMVSS 301 compliance is included in Enclosure 6 – 301 Compliance Crash Tests. The crash test documentation that was relied upon during the development of the fuel system is included in Enclosure 6A – 301 Developmental Crash Tests Conf Bus Info, which has been submitted under separate cover to NHTSA’s Chief Counsel with a request for confidential treatment. Development crash test photos and videos are provided in Enclosure 6A Public.

Chrysler Group has also created a chart that summarizes the available information on these vehicle crash tests, which is included as Enclosure 6C – Summary of 301 Crash Tests Conf Bus Info and Public. The information contained in this chart derives from the crash test documentation provided in Enclosures 6 and 6A.

B. Compliance Procedures and Integrity Standards

Chrysler Group Compliance Procedures and integrity standards for the Subject Peer Vehicles FMVSS 301 testing are included in Enclosure 6D – 301 Compliance Procedure Conf Bus Info Documents.¹

For reasons stated elsewhere in this response, Chrysler Group has included responsive information relating to the 1987 - 1992 Jeep Wrangler (YJ) vehicles.

¹ Chrysler Group understands the request for “fuel system integrity standards” to seek standards that relate to the fuel system performance at the vehicle level, and not to encompass standards applicable at the component level. If this interpretation is incorrect, Chrysler Group invites ODI to further clarify the scope of this request.