



March 8, 2012

Ms. Jennifer T. Timian
Chief, Recall Management Division
Office of Defects Investigation (ODI)
National Highway Traffic Safety Administration (NHTSA)
1200 New Jersey Avenue SE
Washington, D.C. 20590

Re: EQ12-002 Autoliv Air Bag Modules

Dear Ms. Timian:

This letter is Chrysler Group LLC's ("Chrysler") response to Equipment Query (EQ) dated February 23, 2011, relating to 2,177 Autoliv air bag modules sold to Chrysler which may have inadvertently been manufactured with 5 micron titanium hydride initiator propellant compound, in place of 1.8 micron titanium hydride initiator propellant. Specifically, you have requested that Chrysler provide information regarding if Chrysler has made a decision that vehicles manufactured with these modules contain a safety defect and to provide documentation supporting this opinion.

Your requests and our corresponding replies are as follows:

- 1. State whether your company has made, or intends to make, a decision that vehicles it manufactured with these modules contain a safety defect, and will notify its purchasers by conducting a safety recall.**

Chrysler has analyzed the data supplied by Autoliv and agrees with its conclusion that the inflators it supplied within the air bag modules to Chrysler do not contain a safety defect. Therefore, Chrysler will not be recalling vehicles equipped with air bag modules containing the Autoliv ACH2.1B and ACH 2.4 inflators. Chrysler did not purchase air bag modules containing ACH2.1 inflators from Autoliv.

- 2. If your company does not believe that vehicles it manufactured with these modules contain a safety defect, provide all information, such as supporting documents, analysis, and/or test results, that support this opinion.**

Chrysler's position is supported by Autoliv's performance confirmation testing results of 450 ACH2.1B and 200 ACH2.4 inflators. These inflators were manufactured using production assembly processes with the 5 micron titanium hydride material. Performance confirmation testing was conducted at temperatures from ambient down to

-40 °C. Autoliv's data demonstrates these inflators all met the same Lot Acceptance Test (LAT) performance guidelines applicable for inflators with 1.8 micron titanium hydride propellant. Table 1, shown below, provides a summary of performance confirmation test results of 5 micron (Grade B) inflators manufactured using a production representative process.

Table 1: ACH-2.1B & ACH-2.4 with Grade B (5 micron) Inflator Family Testing

Inflator	Test Temp. (°C)	Dia. (mm)	Length (mm)	Production Initiator (# Tested)	Production Initiator (# Passed)
ACH-2.1B	Ambient	35	392	100	100
	Ambient	35	385	100	100
	-40	35	392	100	100
	-40	35	385	100	100
	-40	35	325 [†]	50	50
ACH-2.4	Ambient	30	225	100	100
	-40	30	225	100	100

[†] The longer inflator lengths (385 mm and 392 mm) reflect a worst case condition with respect to burst energy requirements, thus testing at cold and ambient conditions was conducted with these configurations. Therefore, it was determined to test the 325mm variant length only at the extreme cold condition.

Enclosure 01: Tank Test Data (EQ12-002) _PUBLIC represents the performance confirmation tank test data provided by Autoliv to Chrysler which demonstrates the equivalent performance of the 5 micron material inflators (B Grade Initiator) as compared to 1.8 micron material production inflators.

Chrysler concurs with Autoliv's conclusion, as set forth in its February 17, 2012, response to EQ12-002, that the subject ACH2.1B and ACH 2.4 inflators used on Chrysler products will deploy as intended. Therefore, Chrysler has concluded these inflators are neither defective nor pose an unreasonable risk to motor vehicle safety.

Sincerely,



David D. Dillon
Sr. Manager – Campaigns & Investigations
Chrysler Group LLC

Enclosure

ACH-2.1B Inflator Testing

Grade B initiator Production process

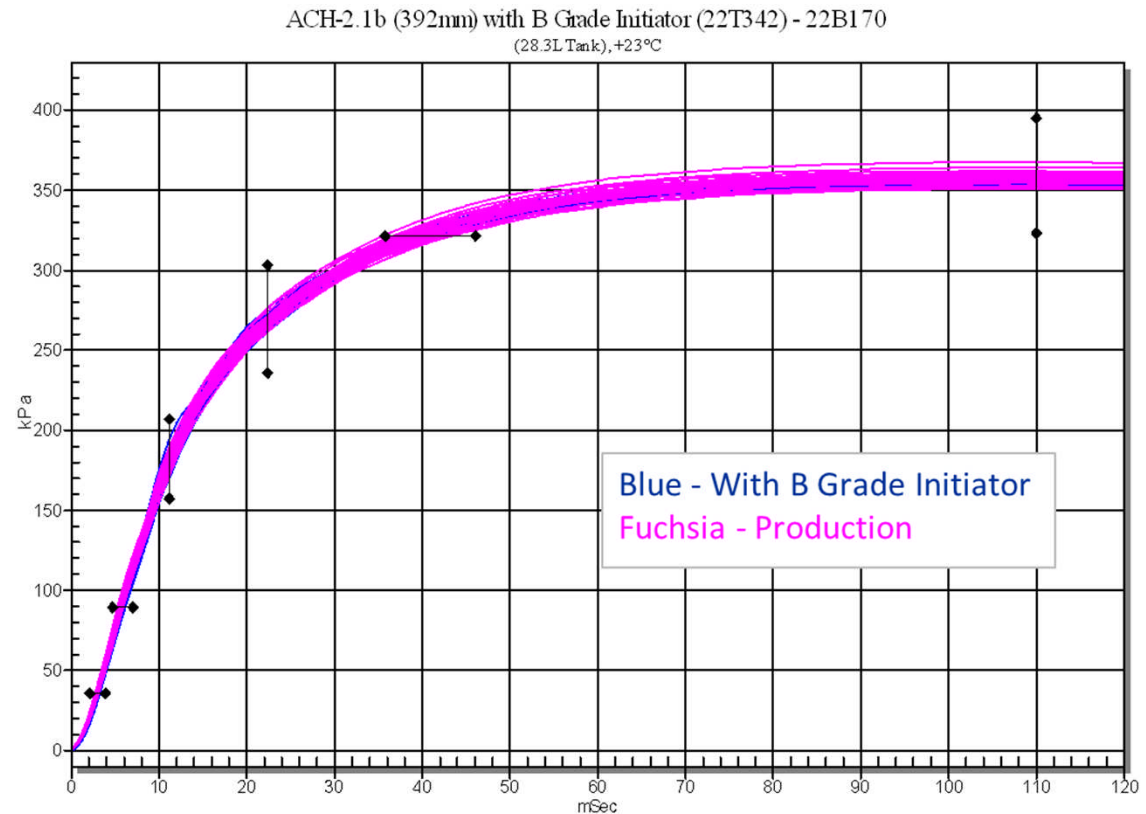
Test Summary:

- Configuration: 392mm,
- 100 inflators tank tested at ambient conditioning

Results

All inflators deployed.

Curves are shown against inflator LAT guidelines.



ACH-2.1B Inflator Testing

Grade B initiator Production process

Test Summary:

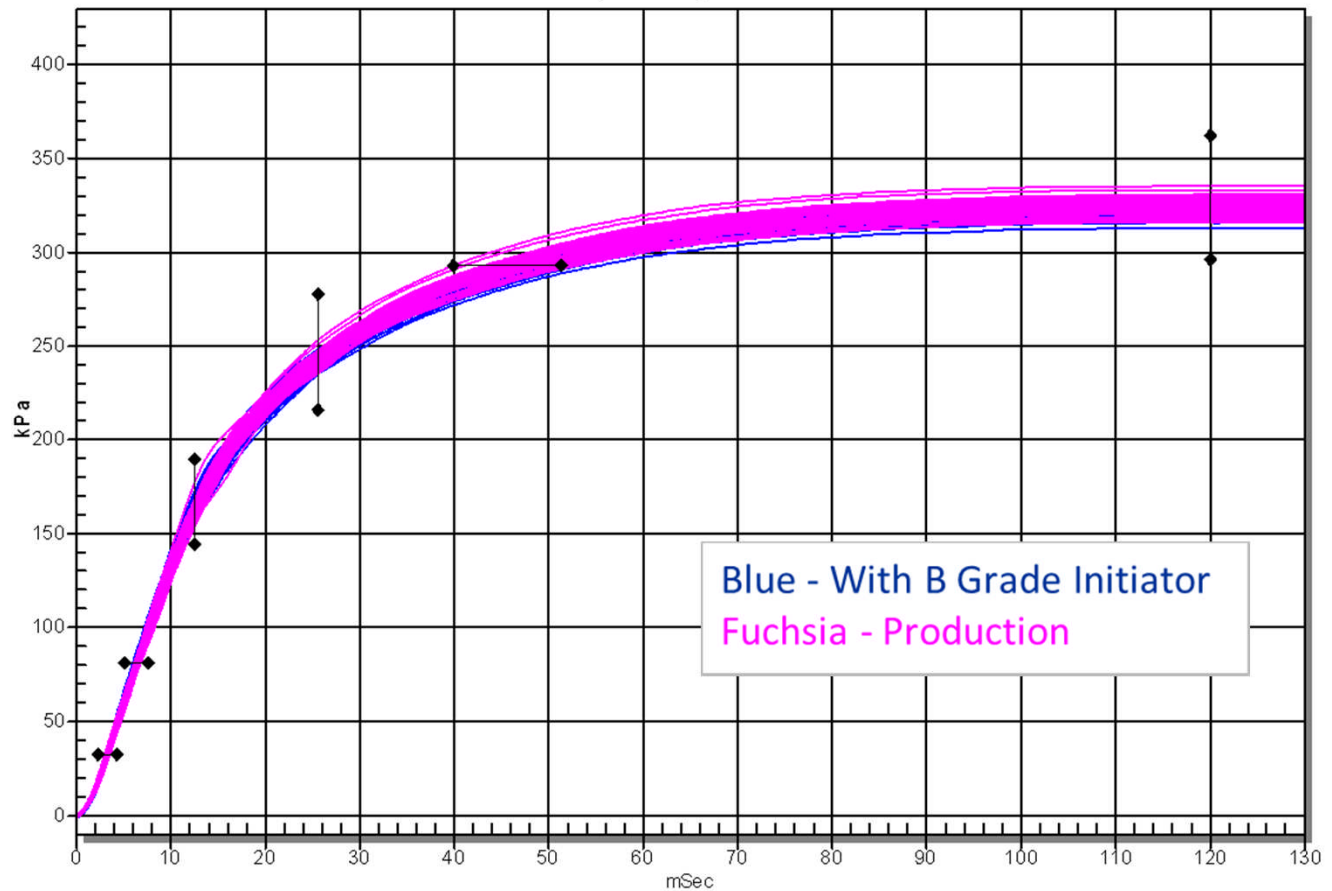
- Configuration: 392mm,
- 100 inflators tank tested at -40C conditioning

Results

All inflators deployed.

Curves are shown against inflator LAT guidelines.

ACH-2.1b (392mm) with B Grade Initiator (22T343) - 22B195
(283L Tank), -40°C



ACH-2.1B Inflator Testing

Grade B initiator Production process

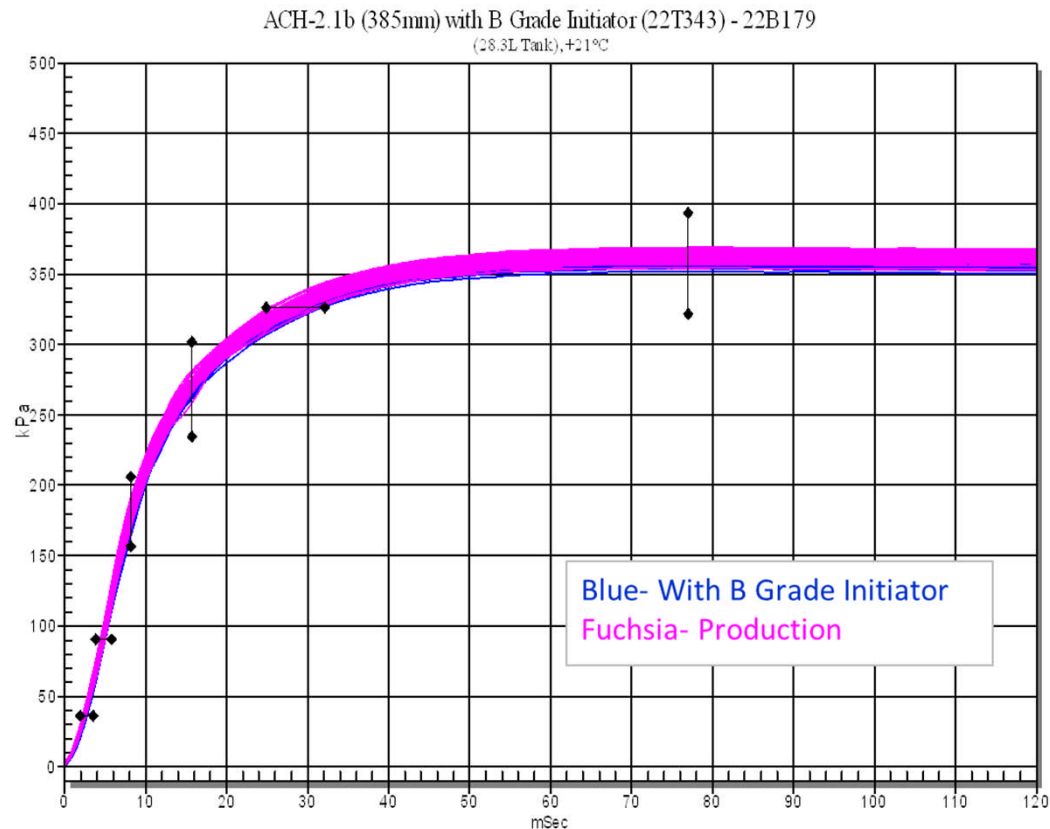
Test Summary:

- Configuration: 385mm,
- 100 inflators tank tested at ambient conditioning

Results

All inflators deployed.

Curves are shown against inflator LAT guidelines.



ACH-2.1B Inflator Testing

Grade B initiator Production process

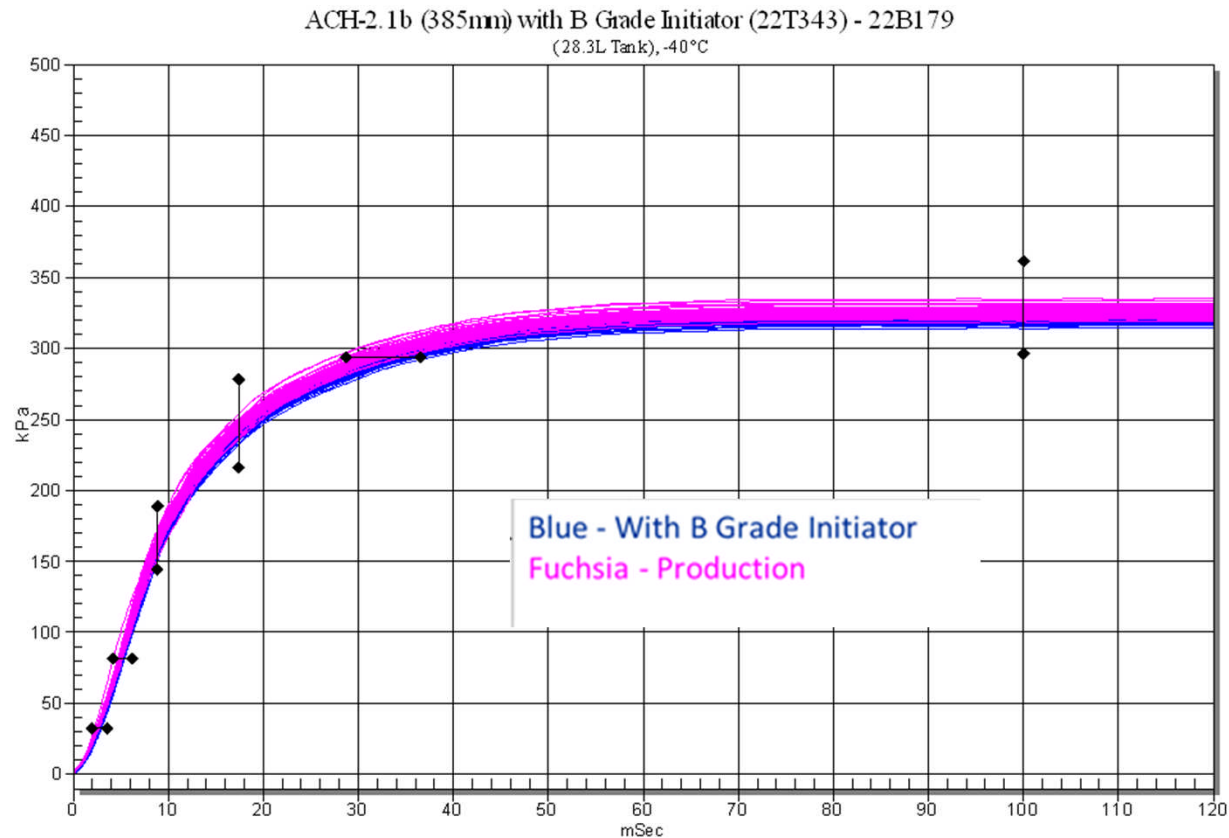
Test Summary:

- Configuration: 385mm,
- 100 inflators tank tested at -40C conditioning

Results

All inflators deployed.

Curves are shown against inflator LAT guidelines.



ACH-2.1B Inflator Testing

Grade B initiator Production process

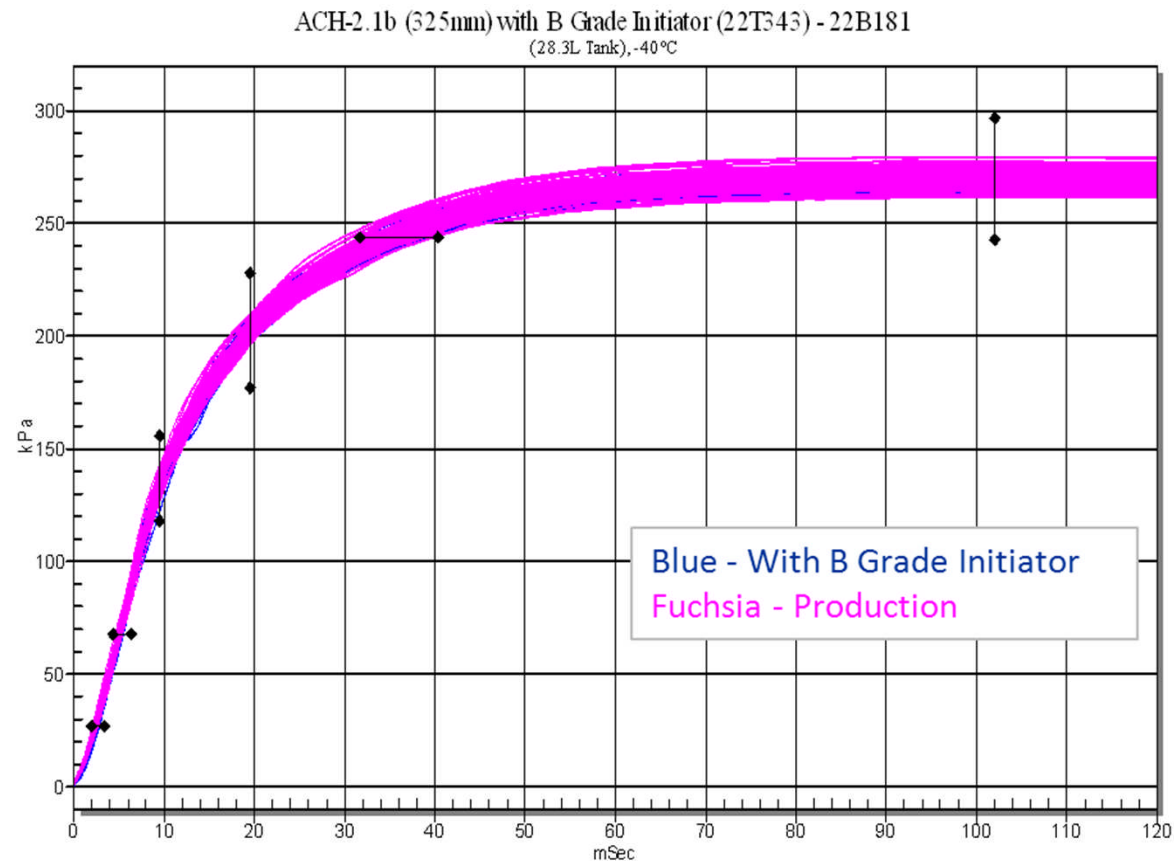
Test Summary:

- Configuration: 325mm,
- 50 inflators tank tested at -40C conditioning

Results

All inflators deployed.

Curves are shown against inflator LAT guidelines.



ACH-2.4 Inflator Testing

Grade B initiator Production process

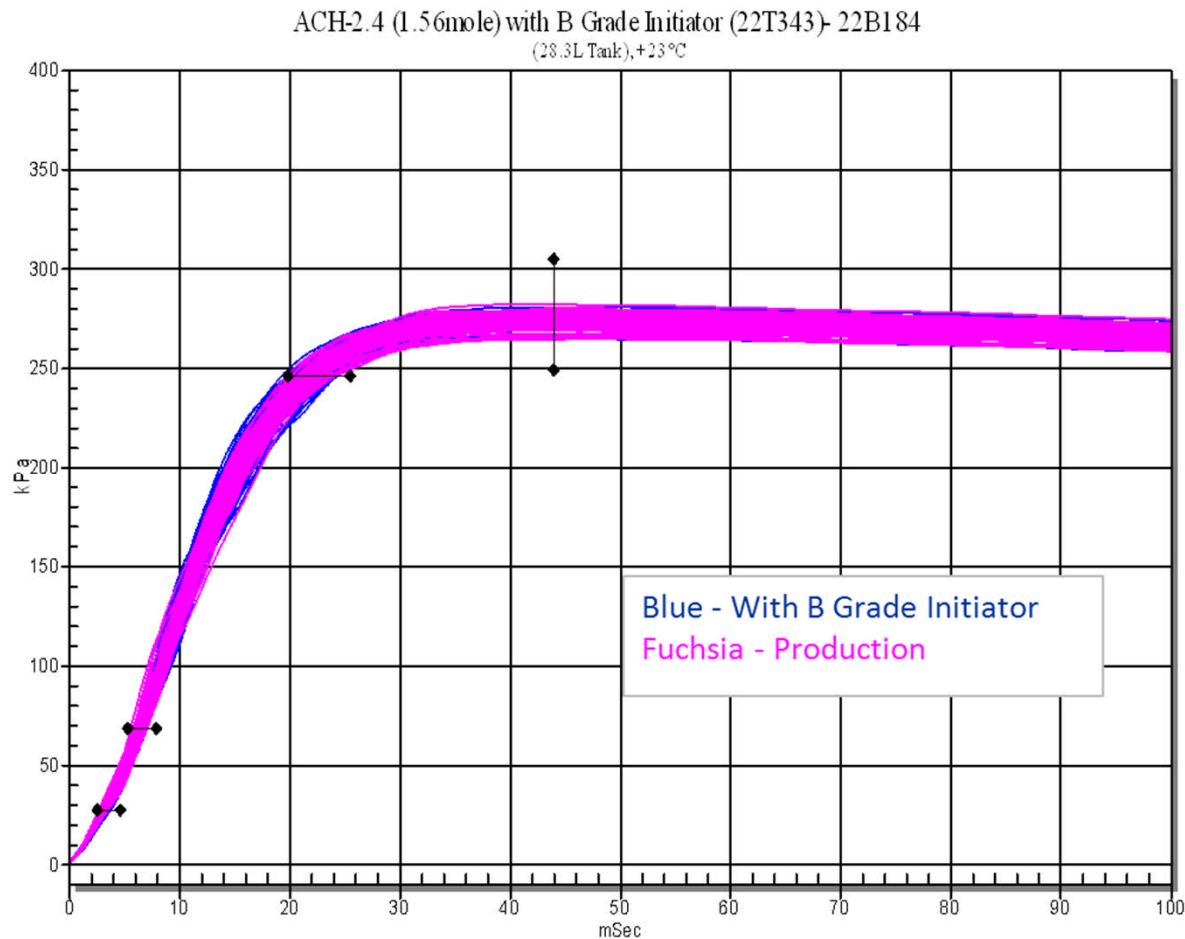
Test Summary:

- Configuration: 225mm,
- 100 inflators tank tested at ambient conditioning

Results

All inflators deployed.

Curves are shown against inflator LAT guidelines.



ACH-2.4 Inflator Testing

Grade B initiator Production process

Test Summary:

- Configuration: 225mm,
- 100 inflators tank tested at -40C conditioning

ACH-2.4 (1.56mole) with B Grade Initiator (22T343)- 22B184
(28.3L Tank), -40°C

Results

All inflators deployed.

Curves are shown against inflator LAT guidelines.

