



David D. Dillon  
Sr. Manager  
Product Investigations & Campaigns

May 22, 2012

Mr. Jeff Quandt  
Chief - Vehicle Control Division  
Office of Defects Investigation  
National Highway Traffic Safety Administration  
1200 New Jersey Ave, SE, W48-312  
Washington D.C. 20590

Re: NVS-213dlr; PE12-009

Dear Mr. Quandt:

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

On May 8, 2012, Chrysler decided to conduct a voluntary safety recall to replace the automatic transmission skid plate with a new automatic transmission skid bar on all affected 2010 model year vehicles built prior to July 14, 2010. On May 15, 2012, Chrysler submitted its Part 573 Defect Information Report.

Pursuant to an agreement between Chrysler and ODI on May 17, 2012, Chrysler is submitting a limited response to the Information Request, which includes answers to Questions 1-10 and 13 pertaining to the subject vehicles.

Sincerely,

A handwritten signature in black ink, appearing to read "David D. Dillon".

David D. Dillon

Attachment and Enclosures

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### **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 April 5, 2012, the date the information request was received.**

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1. **State, by model and model year, the number of subject vehicle and peer vehicles Chrysler has manufactured for sale or lease in the United States. Separately, for each subject vehicle and peer vehicle manufactured to date by Chrysler, state the following:**
  - a. Vehicle identification number (VIN);
  - b. Make;
  - c. Model;
  - d. Model Year;
  - e. Transmission (i.e. Automatic or Manual);
  - f. Engine;
  - g. Whether the vehicle is within the scope of the subject CSN (J31);
  - h. Date of completion of subject CSN (J31), if applicable;
  - i. Whether the vehicle was subject to NHTSA Recall No. 09V-436;
  - j. Date of completion of Recall No. 09V-436, if applicable;
  - k. Date of manufacture;
  1. Date warranty coverage commenced; and
  - m. The State in the United States where the vehicle was originally sold or leased (or delivered for sale or lease).

**Provide the table in Microsoft Access 2003 or 2007, or a compatible format, entitled "PE12- 009 PRODUCTION DATA." See Enclosure**

A1. The chart below lists the 2010 model year ("MY") JK Wrangler sport utility vehicles that have been manufactured by Chrysler Group LLC ("Chrysler") for sale or lease in the United States.

<b>Model Year</b>	<b>2010</b>
Wrangler Automatic Transmission Volume	77,281
Wrangler Manual Transmission Volume	21,332
Total Volume = 98,613	

The detailed response that lists the production data is provided in Enclosure 1 as a Microsoft Access 2000 table entitled "PE12-009 PRODUCTION DATA – SUBJECT VEHICLES."

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 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 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. **Reports involving a fire, 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;**
  - e. **Property damage claims;**
  - f. **Third-party arbitration proceedings where Chrysler is or was a party to the arbitration; and**
  - g. **Lawsuits, both pending and closed, in which Chrysler is or was a defendant or codefendant.**

**For subparts "a" through "e," 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 "g" 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 "f" and "g" 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 summarizes the non-privileged and privileged reports received by Chrysler that relate to, or may relate to, the alleged defect in the subject vehicles. Chrysler has conducted a reasonable and diligent search of our records kept in the ordinary course of business for such information.

Chrysler has identified 34 customer complaints and legal claims of fires that relate to, or may be related to, the alleged defect. Each customer complaint is accompanied by a legal claim associated with the same vehicle and event. Therefore, Chrysler is aware of 34 unique fire events that relate to, or may be related to, the alleged defect.

NHTSA provided Chrysler with 9 VOQ's that may be related to the alleged defect. Chrysler determined that 7 of the VOQ's are associated with 7 of the 34 reports identified by Chrysler.

Of the remaining 2 VOQ's provided by NHTSA, Chrysler's evaluation (included in Question 10/Titled Q-10 Data) determined that 1 (VOQ #10429042) neither occurred in or near the engine compartment, nor was it a result of a vehicle defect. Therefore, Chrysler has not included this VOQ in the summary of counts in the table below. The other VOQ (VOQ #103358879) did not contain a Vehicle Identification Number and Chrysler was unable to identify any reports consistent with the information provided (e.g., customer name, state, date of event, etc.). As a result, Chrysler was unable to verify the complaint. Nonetheless, Chrysler has included the VOQ in its total count of potentially responsive NHTSA VOQ complaints in the table below. In total, there are 8 VOQ's that relate to, or may be related to, the alleged defect included in the table below.

In total, including the 34 unique claims to Chrysler and the 1 unique unverified NHTSA VOQ, 35 total unique claims have been identified that relate to, or may be related to, the alleged defect. None of the 35 unique reports to either Chrysler or NHTSA allege an accident, injury or fatality.

Category Description	CAIRs	Field Reports	Legal Claims	VOQs
<b>Fires (that are or may be related to alleged defect)</b>	35	0	34	8
Fire Originated in Engine Compartment - Cause unknown	7		7	
Fire Originated in Engine Compartment - Caused by aftermarket wiring	4		4	
Fire Originated in Engine Compartment -Cause related to the engine wiring.	1		1	
Fire Originated in Engine Compartment -Cause related to service repair.	2		2	1
Fire Originated Underbody at the Skid Plate - Caused by debris/exhaust contact.	12		12	3
Fire Originated Underbody at the Skid Plate - Cause unknown.	3		3	1
Fire Originated Underbody – Caused by a damaged transfer case.	1		1	1
Fire origin - Unknown.	5		4	2
<b>Total</b>	35	0	34	8

**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. Vehicle owner or fleet name (and fleet contact person);
- d. Vehicle owner or fleet name address;
- e. Vehicle owner telephone number;
- f. Vehicle's VIN;
- g. Vehicle's make, model and model year;
- h. Vehicle's mileage at time of incident;
- i. Incident date;

- j. Report or claim date;**
- k. Whether a crash is alleged;**
- 1. Whether a fire is alleged;**
- m. Whether Chrysler is aware of or has conducted a post incident inspection;**
- 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 2003 - 2007, or a compatible format, entitled "PE12-009 REQUEST NUMBER TWO DATA." See Enclosure 2.**

A3. The detailed response that lists the customer complaints and legal claims from Request No. 2, as requested in Items a. through p. is provided in Enclosure 2 in a Microsoft Access 2010 table, entitled "PE12-009 REQUEST NUMBER TWO DATA – Subject Vehicles".

- 4. Produce copies of all documents, including all post incident inspection reports generated or in the possession of Chrysler, related to each item within the scope of Request No. 2. Organize the documents separately by category (i.e., consumer complaints, field reports, etc.) and describe the method Chrysler used for organizing the documents.**

A4. Certain post-incident inspections for the events identified in response to Request No. 2 were conducted at the request of Chrysler's Office of the General Counsel. These inspections were conducted in anticipation of litigation and the inspection reports are being withheld under a claim of attorney work-product privilege. Chrysler has, however, produced a copy of the available inspection photos for each of these inspections, as well as a recitation of key inspection observations in the "Analysis" section in the Request No. 2 summaries. The summaries and inspection photos are included in Enclosure 2 entitled "Inspection Summaries".

- 5. State, by model and model year, a total count for all 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 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. Chrysler's claim number;**
- b. Vehicle owner or fleet name (and fleet contact person);**
- c. Vehicle owner's telephone number;**
- d. Vehicle owner's address;**
- e. VIN;**
- f. Repair date;**
- g. Vehicle mileage at time of repair;**
- h. Repairing dealer's or facility's name, telephone number, city and state or ZIP code;**
- i. Labor operation number;**
- j. Problem code;**
- k. Replacement part number(s) and description(s);**
- 1. Concern stated by customer; and**
- m. Comment, if any, by dealer/technician relating to claim and/or repair.**

A5. Reports of alleged fire events are generally received by the Chrysler Office of the General Counsel, the Chrysler Customer Assistance Center (as a CAIR) or from other Chrysler field organizations. If an alleged fire event comes to the attention of a dealer technician during a warranty repair, Chrysler requires the dealership to notify Chrysler and a CAIR is created. These CAIRs, to the extent they are responsive to this investigation, are being submitted in response to Questions 2, 3 and 4.

Due to the policy mentioned in the paragraph above, there is only one Problem Code that a dealer could potentially use to document a condition in the warranty system that relates to, or may be related to the alleged defect; UCN or Uncodable Narrative. Chrysler requires that a narrative be entered into the warranty system with each warranty claim that contains a UCN problem code. Chrysler reviewed all UCN narratives for each of the Labor Operations applicable to the alleged defect and determined that there were no UCN warranty claims that relate to, or may relate to the alleged defect.

- 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.**

A.6. Reports of alleged fire events are generally received by the Chrysler Office of the General Counsel, the Chrysler Customer Assistance Center (as a CAIR) or from other Chrysler field organizations. If an alleged fire event comes to the attention of a dealer technician during a warranty repair, Chrysler requires the dealership to notify Chrysler and a CAIR is created. These CAIRs, to the extent they are responsive to this investigation, are being submitted in response to Questions 2, 3 and 4.

There are 21 applicable Labor Operation codes (LOPs) that may apply to the alleged condition. However, due to the policy mentioned in the paragraph above, there is only one Problem Code, UCN or Uncodeable Narrative, that a dealer could potentially use to document a condition in the warranty system that may relate to the alleged defect:. See table below:

<b>Labor Operation Code</b>	<b>Description</b>
08190505	Module, Transmission Control
08190601	Module, Powertrain Control
08191002	Module, Anti Lock brake Control
08193801	Module, Electronic Stability
08890101	TIPM, Test & Replace Cover
08890102	TIPM, Test & Replace Module
08901301	Wiring Harness, Battery Cables
08901501	Circuit Breaker, Test & Replace
08901902	Terminal Battery, Test & Replace Positive Cable
08901903	Terminal Battery, Test & Replace Negative Cable
08902701	Wiring Harness, Antilock Brakes
08906501	Wiring Harness, Test & Replace engine Comp (HDLP to Dash)
08906504	Wiring Harness, Test & Replace Headlamp/Front End Module
08906507	Wiring Harness, Test & Replace Engine & Transmission

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08906518	Wiring Harness, Test & Replace Generator
08906522	Wiring Harness, Test & Replace Wiring Harness, Fan Motor
08906523	Wiring Harness, Test & Replace Fuel Injection Harnesses
08909701	Wiring Harness, Test & Replace Front Axle Elec Limited Slip
08909902	Wiring Harness, Test & Replace Automatic Transmission
08940000	Wiring Harness Repair, Engine & Front End
08951500	Fuses, Test & Replace

<b>Problem Code</b>	<b>Description</b>
UCN	Uncodable narrative

7. **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.**

A7. Copies of all documents within the scope of Question No. 7 are provided in Enclosure 3 entitled – “Service Documents”.

Additionally , within the next 120 days, Chrysler plans to conduct a voluntary safety recall # M22 to replace the automatic transmission skid plate with a new skid bar on all affected 2010 Wranglers built prior to July 14, 2010. Documentation pertaining to this recall is not yet available.

8. **Describe all assessments, analyses, tests, test results, studies, surveys, simulations, investigations, inquiries and/or evaluations (collectively, "actions") that relate to, or may relate to, the alleged defect in the subject vehicles 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. Engineering group(s)/supplier(s) responsible for designing and for conducting the action; and**
  - f. 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.**

A8. Chrysler's initial assessment was previously provided to the NHTSA under separate cover in a request for confidential treatment, entitled "2010 MY JK Fire Investigation 5-3-2012 NHTSA Meeting.pdf".

9. **Describe all modifications or changes made by, or on behalf of, Chrysler in the design, material composition, manufacture, quality control, supply, or installation of the subject component, from the start of production to date, which relate to, or may relate to, the alleged defect in the subject vehicles. For each such modification or change, provide the following information:**
- a. The date or approximate date on which the modification or change was incorporated into vehicle production;**
  - b. A detailed description of the modification or change;**
  - c. The reason(s) for the modification or change;**
  - d. The part number(s) (service and engineering) of the original component;**
  - e. The part number(s) (service and engineering) of the modified component;**
  - f. Whether the original unmodified component was withdrawn from production and/or sale, and if so, when;**
  - g. When the modified component was made available as a service component; and**

- h. Whether the modified component can be interchanged with earlier production components.**

**Also, provide the above information for any modification or change that Chrysler is aware of which may be incorporated into vehicle production within the next 120 days.**

A9. Change information for the transmission skid plate to the skid bar is provided in Enclosure 4 entitled "CONF BUS INFO - Change History Information".

- 10. For each incident identified by Chrysler and in ODI reports within the scope of this request provide the following in tabular form:**
- a. VIN;**
  - b. Chrysler's assessment of the point of origin;**
  - c. Chrysler's assessment of the contributory factors; and**
  - d. Chrysler's assessment of the cause (i.e. Electrical or the component(s) if known)**

A10. A tabular list is attached in Enclosure 5 Titled "Q-10 Data Assessment".

- 11. With reference to the attachment titled "PE12-009 Peer VOQs" provide the following for each report:**
- a. VOQ number**
  - b. VIN;**
  - c. Chrysler's assessment of the point of origin;**
  - d. Chrysler's assessment of the contributory factors of the incident; and**
  - e. Chrysler's Cause (i.e. Electrical or the component(s) if known)**

A11. Pursuant to an agreement between Chrysler and ODI on May 17, 2012, Chrysler's response to questions 11 and 12 is no longer required.

- 12. For the peer vehicles, as related to the alleged defect in the subject vehicles provide the number of incidents Chrysler is aware of by MY:**
- a. Point of origin; and**
  - b. Cause (i.e. Electrical or the component(s) if known)**

A12. Pursuant to an agreement between Chrysler and ODI on May 17, 2012, Chrysler's response to questions 11 and 12 is no longer required.

**13. Furnish Chrysler's assessment of the alleged defect in the subject vehicle, 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;**
- e. What warnings, if any, the operator and the other persons both inside and outside the vehicle would have that the alleged defect was occurring or subject component was malfunctioning; and**
- f. The reports included with this inquiry.**

A13. Chrysler's investigation identified an elevated level of fire events originating underbody near the engine compartment on certain 2010 model year Wrangler vehicles, which was attributed to a design change of the exhaust system. This investigation has identified that 2010 model year exhaust system changes resulted in less than optimal clearances between the exhaust catalyst and the automatic transmission skid plate. If debris collects in the area of the automatic transmission skid plate and is not removed, the 2010 model year exhaust system change increased the potential for an underbody debris fire. The 2010 model year Wrangler vehicles equipped with a manual transmission are not equipped with the automatic transmission skid plate and, therefore, are not affected.

Beginning on July 14, 2010, 2010 model year and subsequent model year vehicles were built with a skid bar to reduce weight, which later proved to reduce the potential for debris collection and underbody fire events.

On May 8, 2012, Chrysler decided to conduct a voluntary safety recall to replace the automatic transmission skid plate with a new automatic transmission skid bar on all affected 2010 model year Wrangler vehicles built prior to July 14, 2010. On May 15, 2012, Chrysler submitted its Part 573 Defect Information Report to NHTSA indicating its intent to conduct a voluntary safety recall on certain 2010 model year Jeep Wrangler vehicles.