



September 11, 2012

Mr. Jeffrey L. Quandt, Chief
Vehicle Controls Division (VCD), NVS-213
U.S. Department of Transportation

National Highway Traffic Safety Administration (NHTSA)
Office of Defects Investigation (ODI)
Room W48-312
1200 New Jersey Avenue SE
Washington, D.C. 20590

Reference: NVS-213krh; PE12-020

Dear Mr. Quandt:

Attached is Chrysler Group LLC's partial response to the referenced inquiry (Question 1- 6, 8, and 9a). In performing the analysis and reaching conclusions, and by providing the information contained herein, Chrysler Group LLC is not waiving its claim to attorney work product and attorney-client privileged communications. As agreed during our September 4, 2012 communication, Chrysler Group LLC plans to provide the remainder of its response to this inquiry on September 25, 2012.

Sincerely,

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

David D. Dillon

Attachment and Enclosures

Mr. Jeffrey L. Quandt
Reference: NVS-213krh; PE12-020
September 11, 2012

ATTACHMENT

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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).

Note: Unless indicated otherwise in the response to a question, this document contains information through July 30, 2012, the date the information request was received.

This attachment contains Chrysler Group LLC's partial response to Questions 1- 6, 8 and 9a.

1. **State, by model, engine and model year, the number of MY 2012 Jeep Grand Cherokee Chrysler manufactured for sale or lease in the United States and federalized territories. Separately, for each subject vehicle manufactured to date by Chrysler, state the following:**
 - a. **Vehicle identification number (VIN);**
 - b. **Model;**
 - c. **Engine (displacement and engine code);**
 - d. **Model Year;**
 - e. **Date of manufacture; Date warranty coverage commenced; and**
 - f. **The State in the United States, or federalized territory, where the vehicle was originally sold or leased (or delivered for sale or lease).**

Provide the table in Microsoft Access 2003, 2007, or a compatible format, entitled "PE12_020_ PRODUCTION DATA."

- A1. The 2012 model year (MY) Jeep Grand Cherokee US market vehicles are designated as the WK model and are built in the Jefferson North Assembly Plant in Detroit, Michigan. The total number of subject vehicles manufactured by Chrysler for sale or lease for the US market was 147,346.

The detailed response that lists the production data is provided in Enclosure 1 as Microsoft Access 2010 tables titled "PRODUCTION DATA (PE12-020).mdb".

2. **State, by model, engine and model year, 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 MY 2012 Jeep Grand Cherokee 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 reports identified by Chrysler that relate to, or may relate to, the alleged condition in the subject vehicles. Within the subject vehicles, only vehicles equipped with the 3.6L engine contain the subject component(s). Chrysler has conducted a reasonable and diligent search of the normal repositories of such information.
- a. There are 34 consumer complaints (Customer Assistance Inquiry Request or CAIR) that may relate to the alleged condition for the subject vehicle, which represent 26 unique VINs.
 - b. There are a total 20 field reports that may relate to the alleged condition for the subject vehicles, which represent 18 unique VINs.
 - c. There are no reports alleging a crash in the subject vehicles that may relate to the alleged condition.
 - d. There are no reports alleging a fire in the subject vehicles that may relate to a malfunction in the EHPS system.
 - e. There are no reports alleging property damage in the subject vehicles that may relate to the alleged condition.
 - f. There are no third-party arbitration proceedings involving Chrysler for the subject vehicles.
 - g. There are no legal claims involving the subject vehicles that may relate to the alleged condition.

Based on the analysis of these complaints for the subject vehicles, Chrysler has determined that all of the responsive complaints (CAIRs and field reports) comprise 37 unique VINs.

- 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. 3 (i.e., consumer complaint, field report, etc.);**
 - c. Vehicle owner or fleet name (and fleet contact person), address and telephone number;**
 - d. Vehicle's VIN;**
 - e. Vehicle's model and model year;**
 - f. Vehicle's mileage at time of incident;**
 - g. Incident date;**
 - h. Report or claim date;**
 - i. Whether a crash is alleged;**
 - j. Whether a fire is alleged;**
 - k. Whether smoke is alleged;**
 - l. Whether property damage is alleged;**
 - m. Number of alleged injuries, if any; and**
 - n. Number of alleged fatalities, if any.**

Provide this information in Microsoft Access 2003 or 2007, or a compatible format, entitled "PE12_020_REQUEST NUMBER THREE DATA."

- A3. The detailed response that lists the customer complaints and field reports (there are no legal claims) from Request No. 2, as requested in Items a. through n. is provided in Enclosure 3 in a Microsoft Access 2010 table, titled "PE12-020_REQUEST NUMBER THREE DATA.mdb".
- 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., consumer complaints, field reports, etc.) and describe the method Chrysler used for organizing the documents.**
- A4. Copies of all documents within the scope of Question No. 2 are provided in Enclosure 4 – Field Data. The documents for the subject vehicles contain CAIR reports, and field reports (there are no legal claims). The CAIR summaries are submitted in one .pdf file and the related documents are arranged in folders by CAIR number.
- 5. State, by model, engine and model year, total counts 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 MY 2012 Jeep Grand Cherokee 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) and telephone number;**
- c. VIN;**
- d. Repair date;**
- e. Whether a claim for towing was made within five days of the claim date;**
- f. Vehicle mileage at time of repair;**
- g. Repairing dealer's or facility's name, telephone number, city and state or ZIP code;**
- h. Labor operation number and description;**
- i. Problem code and description;**
- j. Replacement part number(s) and description(s);**
- k. Concern stated by customer;**
- l. Cause and Correction stated by dealer/technician; and**
- m. Additional comments, if any, by dealer/technician relating to claim and/or repair.**

Provide this information in Microsoft Access 2003 or 2007, or a compatible format, entitled "PE12_020_WARRANTY DATA."

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).

A5. The total number of warranty claims for the subject component, in the subject vehicles is listed below.

Claim Description (may relate to the subject component):		Number of Warranty Claims
05154409AE	Hose, Power Steering	1
05154409AD	Hose, Power Steering	9
05154458AC	Hose, Power Steering Return	3
52124650AE	Hose, Power Steering Return	6
68069651AC	Cooler, Power Steering	11

Additionally, not all of the warranty claims are necessarily related to the alleged condition as there are other reasons for power steering pressure or return line replacement. Therefore, the number of responsive warranty claims may be artificially high with regard to the alleged condition. Thus, Chrysler has not drawn conclusions regarding trends for the subject components in subject vehicles, based on warranty data alone.

The part numbers, labor operations, and failure codes used by Chrysler to identify warranty claims are noted in the charts below. In conducting its search, Chrysler included warranty claims where:

- A power steering pressure or return line was replaced as part of the warranty claim; and
- A warranty claim narrative was potentially related to the alleged condition or was not clear enough for it to be ruled out.

EHPS Pressure and Return Hose Part Numbers & Description	
05154409AE	Hose, Power Steering
05154409AD	Hose, Power Steering
05154409AC	Hose, Power Steering
05154409AB	Hose, Power Steering
05154409AA	Hose, Power Steering
05154458AC	Hose, Power Steering Return
05154458AA	Hose, Power Steering Return
52124635AG	Hose, Power Steering Return
52124635AF	Hose, Power Steering Return
52124635AD	Hose, Power Steering Return
52124650AE	Hose, Power Steering Return
52124656AF	Hose, Power Steering Pressure
52124656AD	Hose, Power Steering Pressure
68069651AC	Cooler, Power Steering
68069651AA	Cooler, Power Steering

Description of Repair	Labor Operation
Hose, pump pressure - Replace All others	19501015
Hose, pump/reservoir return - Replace Return line-Cooler to reservoir	19501534
Hose, pump/reservoir return - Replace Return line-Gear to cooler	19501535
Hose, pump supply - Replace All others	19501711
Hose, pump supply - Replace 5.7-6.4 liter engine	19501713
Cooler, power steering oil - Replace All others	19502001

Failure Code	Description
X2	Split, Cut or Torn
08	Blocked or Restricted
11	Broken or Cracked
71	Oil Leak

The standard warranty coverage offered for the subject vehicles was 36 months / 36,000 miles.

The detailed response that lists the warranty claims is provided in Enclosure 5 – "PE12_020_WARRANTY DATA.mdb"

- 6. 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, bulletin, 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.**
- A6. There are no GPOP tech tips, Technical Service Bulletins or informational documents related to the alleged condition for the subject vehicles that have been issued to Chrysler dealers, Business Centers, fleet purchasers or other such entities. There are also no such communications or informational documents currently planned for the next 120 days.
- 8. 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

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.

- A8. The requested information for the subject components, specifically relating to the alleged defect, is provided in Enclosure 8 – Subject Component Changes – CONF BUS INFO which has been submitted under separate cover to the NHTSA Chief Counsel's Office with a request for confidential treatment.

9. Produce the following sample parts:

- a. One exemplar sample of each design version of the EHPS supply and return hose assemblies; and

- A9. The requested information is summarized below.

- a. Chrysler is providing exemplar samples of EHPS pressure/return lines for the 2012 subject vehicles. Chrysler is currently trying to locate previous design levels for the EHPS pressure/return lines. Listed below are the part numbers:

Part Number	Description
05154409AE	Hose, Power Steering
05154458AC	Hose, Power Steering Return
52124635AF	Hose, Power Steering Return
52124650AE	Hose, Power Steering Return
52124656AF	Hose, Power Steering Pressure
68069651AC	Cooler, Power Steering