

# CENTER FOR AUTO SAFETY

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August 27, 2014

The Honorable David J. Friedman  
Acting Administrator  
National Highway Traffic Safety Administration (NHTSA)  
1200 New Jersey Avenue SE, West Building  
Washington, D.C. 20590

Dear Administrator Friedman:

The Center for Auto Safety (CAS) [filed a petition for defect investigation on August 21](#) regarding Chrysler Totally Integrated Power Modules (TIPM) failures. We write to you today in order to supplement our petition with information taken from NHTSA's Early Warning Reporting (EWR) database.

CAS has reviewed a number of complaints from both the CAS and NHTSA complaint databases. These complaints implicate the Chrysler TIPM in vehicle stalling, airbag non-deployment, random horn, headlight, taillight, power window, door lock, instrument panel and windshield wiper activity, failure of fuel pump shutoff resulting in unintended acceleration, and fires. Since the TIPM functions as the central gateway for all vehicle electronics, there are multiple EWR component codes that could point to the defect. These codes include airbags, electrical system, engine and engine cooling, exterior lighting, fire related, powertrain, service brake, speed control, and unknown.

**Attachment A contains EWR information on all fatal crashes involving the components associated with TIPM failure.** There are 24 such crashes involving 28 deaths that the agency must consider in reviewing our petition, at least twelve of which have been the subject of DI requests. There are also a large number of injury crashes reported to EWR that involve these components. Which of these crashes are related to TIPM failure is a matter that can only be known after an evaluation of each crash.

As [CAS has previously highlighted](#) in relation to GM ignition switch failures, the summary information provided in manufacturer EWR reporting is so general as to be functionally useless when evaluating a complex defect involving multiple vehicle components. There is simply no way for an analyst reviewing EWR reports to determine whether or not an individual EWR report relates to a defect under investigation. **Until NHTSA expands EWR component coding, the agency has to obtain and look at the underlying documents for each and every crash reported to EWR when evaluating defect trends.**

In the immediate case involving Chrysler TIPM failures, CAS requests that NHTSA place all DI records related to these crashes in the public file for the defect petition. Additionally, the agency must follow up on all EWR reports concerning death or injury in the subject vehicles in the Center's defect petition, particularly those involving any component likely to be associated with TIPM failure. Given the ability of manufacturers to select non-relevant components under EWR [as Toyota did in delaying the tie-rod recall 05V-389](#) that led to [a \\$16 million fine](#), the Center calls on NHTSA to obtain the underlying documents on all Chrysler EWR death reports on the subject vehicles for crashes related to TIPM failure and place them in the defect petition public file.

Sincerely,

A handwritten signature in black ink, appearing to read 'm/b' followed by a stylized flourish.

Michael Brooks  
Staff Attorney

QUARTER	SEQUENCE_ID	DI ID	MAKE	MODEL	MODEL_YEAR	VIN	INCIDENT_DATE
2007 Q1	46	None	DODGE	GRAND CARAVAN	2007	1D4GP24R67B...	2/24/2007
2008 Q1	98	DI08-073	JEEP	LIBERTY 4X4	2007	1J4GL48K57W...	5/3/2007
2008 Q2	229	DI08-108	DODGE	RAM2500HD QUADCAB 4X4 S	2007	1D7KS28C57J...	5/6/2007
2009 Q1	41	None	DODGE	RAM1500 QUADCAB SWB	2007	1D7HA18P77J...	12/3/2007
2009 Q1	63	DI09-063	JEEP	WRANGLER 4-DR 4X4	2008	1J4GA39158L...	8/17/2008
2009 Q2	25	None	DODGE	RAM2500HD QUADCAB 4X4 S	2008	3D7KS28A58G...	4/27/2009
2009 Q3	14	DI10-014	DODGE	RAM2500HD QUADCAB 4X4 S	2007	3D7KS28DX7G...	2/10/2008
2010 Q2	13	None	DODGE	GRAND CARAVAN	2009	2D8HN54199R...	4/5/2010
2010 Q3	24	DI11-001	DODGE	JOURNEY	2010	3D4PG5FV1AT...	5/12/2010
2011 Q1	36	DI11-068	DODGE	RAM1500 QUADCAB 4X4 SWI	2008	1D7HU18298S...	12/18/2010
2011 Q2	15	DI11-093	DODGE	GRAND CARAVAN	2008	2D8HN44H48R...	2/27/2011
2011 Q2	22	DI11-093	DODGE	RAM1500 REGCAB SWB	2010	3D7JB1EK2AG...	5/2/2011
2011 Q3	42	No Data	JEEP	GRAND CHEROKEE 4X4	2011	1J4RR4GG4BC...	6/16/2011
2011 Q3	49	No Data	JEEP	WRANGLER 4-DR 4X4	2011	1J4BA6H10BL...	6/17/2011
2011 Q4	23	DI12-013	DODGE	GRAND CARAVAN	2011	2D4RN5DG5BR...	10/29/2011
2012 Q1	38	None	JEEP	GRAND CHEROKEE 4X4	2008	1J8GR48K28C...	4/9/2010
2012 Q2	23	DI12-062	DODGE	JOURNEY	2009	3D4GG57V49T...	6/16/2011
2012 Q3	36	DI12-106	JEEP	GRAND CHEROKEE 4X4	2011	1J4RR4GG4BC...	12/20/2010
2012 Q3	22	DI12-106	DODGE	JOURNEY	2009	3D4GG67VX9T...	7/6/2012
2012 Q3	4	None	CHRYSLER	TOWN&COUNTRY	2008	2A8HR64X18R...	8/14/2012
2012 Q3	5	None	CHRYSLER	TOWN&COUNTRY	2008	2A8HR44H38R...	10/11/2011
2013 Q1	26	None	JEEP	GRAND CHEROKEE 4X4	2007	1J8GR48K97C...	4/26/2012
2013 Q1	20	None	DODGE	RAM1500 QUADCAB SWB	2007	1D7HA18257S...	4/23/2012
2013 Q4	32	No Data	JEEP	WRANGLER 4-DR 4X4	2012	1C4BJWFG4CL...	11/8/2013

DEATHS	INJURIES	STATE_OR_COMPONENT_A	COMPONENT_B	COMPONENT_C	COMPONENT_D
1	0	WI Unknown			
1	0	NY Power Train			
1	0	LA Rollover	Air Bags		
3	1	LA Unknown			
1	0	FL Air Bags	Seat Belts		
2	0	IA Unknown			
1	3	VENEZUELA Rollover	Air Bags		
1	0	FL Unknown			
1	1	UT Air Bags			
1	0	TX Fire Related	Engine & Engine Cooling	Fuel System	Speed Control
1	0	CA Power Train			
1	0	KY Air Bags			
1	0	SC Speed Control			
1	0	OK Power Train			
1	0	MI Air Bags			
1	1	AZ Air Bags	Seat Belts		
1	2	GA Air Bags	Seat Belts		
1	0	MO Speed Control			
1	0	TX Service Brake			
1	1	MN Air Bags			
1	0	AR Air Bags	Seats	Other	
1	0	WV Unknown			
1	0	TX Air Bags	Seat Belts		
2	0	CHINA Air Bags			

COMPONENT\_E