OCT 2 1 2014

1200 New Jersey Avenue SE. Washington, DC 20590

National Highway Traffic Safety Administration

VIA E-MAIL AND CERTIFIED MAIL RETURN RECEIPT REQUESTED

Mr. Phil Hartnagel Senior Manager, Product Investigations & Campaigns Chrysler Group LLC CIMS 482-00-91 800 Chrysler Drive Auburn Hills, MI 48326-2757 NVS-215rwg AQ14-003

Dear Mr. Hartnagel:

This letter is to inform you that the Office of Defects Investigation (ODI) of the National Highway Traffic Safety Administration (NHTSA) has opened an Audit Query (AQ14-003) to investigate the delays in execution of recall campaigns 13V-528 and 13V-529, coupled with communications with the agency over its execution of those campaigns. These campaigns are to address a defect in the left tie rod ball stud of certain model year 2003-2012 Dodge Ram vehicles and that could result in loss of steering control. Vehicles are first to be inspected to see if they require a new part and, if so, a new steering linkage assembly is to be installed free of charge.

This office has received 1,012 complaints since Chrysler launched its recall campaigns in or around January 6, 2014, complaining of part availability issues on both recalls. Large volumes of owners are complaining that they are being told it would be, or will be, many months before a part can be secured to remedy their vehicles. A list of the complaint numbers associated with these complaints is attached.

Last winter ODI received information from dealers reflecting that severe parts restrictions were in place and, eventually, received a copy of a notification Chrysler's parts division Mopar issued instructing dealers to immediately return any remedy part(s) they had in stock for "quality verification." Chrysler did not communicate to NHTSA any concern about the remedy parts at any time prior to NHTSA's discovery of this document, despite that the agency had been in contact with Chrysler about the pacing of the parts availability for the safety recalls.

We also understand from documents it has submitted on these recalls that Chrysler has employed a replenishment strategy under which a dealership can only order a single repair kit at a time, and even then only after Chrysler has received a claim verifying the dealer has used an existing remedy part in the dealer's stock.

We have concerns with the administration and execution of these safety recalls and accordingly have opened an investigation to collect further information from Chrysler about the details of administration and execution of these campaigns and the logic that supports the strategies used.

Unless otherwise stated in the text, the following definitions apply to these information requests:



- Subject vehicles: all vehicles covered by safety recalls 13V-528 and 13V-529.
- <u>Chrysler</u>: Chrysler Group LLC, all of its past and present officers and employees, whether assigned to its principal offices or any of its field or other locations, including all of its divisions, subsidiaries (whether or not incorporated) and affiliated enterprises, including its parts division Mopar, and all of their headquarters, regional, zone and other offices and their employees, and all agents, contractors, consultants, attorneys and law firms and other persons engaged directly or indirectly (e.g., employee of a consultant) by or under the control of Chrysler (including all business units and persons previously referred to).
- Subject defect: a defect in the left tie rod ball stud that could result in loss of steering control.
- Subject recalls: Refers to NHTSA Safety Recalls 13V-528 and 13V-529.
- **Document:** "Document(s)" is used in the broadest sense of the word and shall mean all original written, printed, typed, recorded, or graphic matter whatsoever, however produced or reproduced, of every kind, nature, and description, and all non-identical copies of both sides thereof, including, but not limited to, papers, letters, memoranda, correspondence, communications, electronic mail (e-mail) messages (existing in hard copy and/or in electronic storage), faxes, mailgrams, telegrams, cables, telex messages, notes, annotations, working papers, drafts, minutes, records, audio and video recordings, data, databases, other information bases, summaries, charts, tables, graphics, other visual displays, photographs, statements, interviews, opinions, reports, newspaper articles, studies, analyses, evaluations, interpretations, contracts, agreements, jottings, agendas, bulletins, notices, announcements, instructions, blueprints, drawings, as-built, changes, manuals, publications, work schedules, journals, statistical data, desk, portable and computer calendars, appointment books, diaries, travel reports, lists, tabulations, computer printouts, data processing program libraries, data processing inputs and outputs, microfilms, microfiches, statements for services, resolutions, financial statements, governmental records, business records, personnel records, work orders, pleadings, discovery in any form, affidavits, motions, responses to discovery, all transcripts, administrative filings and all mechanical, magnetic, photographic and electronic records or recordings of any kind, including any storage media associated with computers, including, but not limited to, information on hard drives, floppy disks, backup tapes, and zip drives, electronic communications, including but not limited to, the Internet and shall include any drafts or revisions pertaining to any of the foregoing, all other things similar to any of the foregoing, however denominated by Chrysler, any other data compilations from which information can be obtained, translated if necessary, into a usable form and any other documents. For purposes of this request, any document which contains any note, comment, addition, deletion, insertion, annotation, or otherwise comprises a non-identical copy of another document shall be treated as a separate document subject to production. In all cases where original and any non-identical copies are not available, "document(s)" also means any identical copies of the original and all non-identical copies thereof. Any document, record, graph, chart, film or photograph originally produced in color must be provided in color. Furnish all documents whether verified by Chrysler or not. If a document is not in the English language, provide both the original document and an English translation of the document.

• Other Terms: To the extent that they are used in these information requests, the terms "claim," "consumer complaint," "dealer field report," "field report," "fire," "fleet," "good will," "make," "model," "model year," "notice," "property damage," "property damage claim," "rollover," "type," "warranty," "warranty adjustment," and "warranty claim," whether used in singular or in plural form, have the same meaning as found in 49 CFR 579.4.

In order for my staff to conduct this investigation into Chrysler's execution of these safety recall campaigns as well as its communications with the agency about that execution, certain information is required. Pursuant to 49 U.S.C. § 30166, please provide numbered responses to the following information requests. Insofar as Chrysler has previously provided a document to ODI, Chrysler may produce it again or identify the document, the document submission to ODI in which it was included and the precise location in that submission where the document is located. When documents are produced, the documents shall be produced in an identified, organized manner that corresponds with the organization of this information request letter (including all individual requests and subparts). When documents are produced and the documents would not, standing alone, be self-explanatory, the production of documents shall be supplemented and accompanied by explanation.

Please repeat the applicable request verbatim above each response. After Chrysler's response to each request, identify the source of the information and indicate the last date the information was gathered.

- 1. State, by model and model year, the number of subject vehicles Chrysler has manufactured for sale or lease in the United States. Separately, for each subject vehicle manufactured to date by Chrysler, state the following:
 - a. Vehicle identification number (VIN);
 - b. Make:
 - c. Model:
 - d. Model Year:
 - e. Date of manufacture:
 - f. Date warranty coverage commenced;
 - g. The State in the United States where the vehicle was originally sold or leased (or delivered for sale or lease).
 - h. Identify which safety recall applies to the vehicle;
 - i. The date the recall remedy inspection was completed. For vehicles that have not been returned for recall remedy inspection, state "NA";
 - j. Whether the dealer determined a new steering linkage was needed. For vehicles that have not been returned for recall remedy inspection, state "NA."
 - k. For vehicles for which a new steering linkage was needed, the date the subject recall's remedy parts were ordered;
 - 1. For vehicles for which a new steering linkage was needed, the date the remedy parts were shipped to the dealer; and
 - m. For vehicles for which a new steering linkage was needed, the date the recall remedy was completed on the vehicle.

Provide the table in Microsoft Access 2010, or a compatible format, entitled "RECALL COMPLETION DATA." See Enclosure 1, Data Collection Disc, for a pre-formatted table in which to provide the responsive information.

- 2. Identify all notices, communications, or instructions Chrysler issued, transmitted, or otherwise made available to its dealers relating in any way to safety recalls 13V-528 or 13V-529. This request includes, but is not limited to, notices, communications and instructions related to remedy timing, remedy availability, remedy application, remedy parts ordering, and remedy parts restrictions. For each notice or communication you identify, state:
 - a. The date it was transmitted;
 - b. The type of notice or communication it was (e.g., recall notice, dealer bulletin, internal communication, etc.);
 - c. The means of transmission (e.g., email, Chrysler's interactive network, fax, etc.);
 - d. The group within Chrysler that issued it (e.g., Mopar, parts engineering, recall administration, etc.).

Produce a copy or each notice or communication you identify in response to this question, including copies of any accompanying attachments. If Chrysler submitted a communication to the agency and it is part of the respective recall's file, it should so state and may choose not to produce the communication again. In any case, it should still identify the communication as requested above in response to items (a) through (e).

3. Describe the process(es) for drafting, reviewing, and approving of recall communications to dealers, including any associated technical, parts ordering, parts supply, or other administrative information or instructions. Include a description and identification of the personnel, groups, or offices, that prepare the communications, as well as a description and identification of the personnel, groups, or offices that approve them before issuance to dealers. Please further specify whether this same process was followed, and the same personnel, groups, or offices included, for the issuance of the notification Mopar issued on or about 02/27/2014 instructing dealers to immediately return the recall remedy part(s) for quality verification.

If that process was not followed, or the same personnel, groups or offices, were not included, please so state and explain why.

If there are documents or materials that illustrate the process, please produce copies.

4. Identify and explain how Chrysler becomes aware of potential problems or concerns with the adequacy of a recall remedy post-launch and what personnel, teams, and groups are involved in investigating potential remedy part problems, and then identify what personnel, teams, and groups are involved if and when a decision needs to be made about whether to continue with a remedy, whether it be a part or an instruction, or to take actions to supply a different remedy part or instruction and conduct a "re-recall."

If there are materials that illustrate this process, please produce copies.

- 5. When and how did Chrysler first become aware of the quality concern with the remedy part(s) in safety recalls 13V-528 and 13V-529 and what caused it to issue a notice to all dealers to immediately return the parts to it for quality verification?
- 6. Were the same personnel, teams, and groups that you identified in response to question 4 involved in investigating that quality concern, and then deciding to continue with the remedy part? If not, please explain.

7. When did Chrysler decide its concerns about the recall remedy part(s) in 13V528 and 13V529 were such that it should issue a notice to its dealers to stop the further distribution of those parts to dealers and return any stock?

Which personnel, teams, or groups, made that decision?

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.

- 8. When, and on what basis, did Chrysler determine it no longer had concerns with the remedy part(s), and when did it decide to notify dealers that they may resume the remedy campaigns for the two recalls? Which personnel, teams, or groups, made that decision?
- 9. Identify the suppliers/manufacturers involved in producing the remedy part(s) for recalls 13V528 and 13V529. Describe each supplier's role in production including, but not limited, to its tier designation (e.g., tier 1, tier 2, etc.). Describe the production schedule for each, to include number of lines and shifts and provide an average of parts produced a day, a week, and a month based on current production.
- 10. Provide the following information:
 - a. State the parts volume when the 13V-528 and 13V-529 recalls were launched.
 - b. The rate at which the recall remedy parts are or were being produced;
 - c. The rate at which the recall remedy parts are or were being supplied to dealers;
 - d. An identification of any and all factors that influence whether to send parts to different dealers at different rates (e.g., sales volume, number of recalled vehicles assigned to that dealer, etc.); and
 - e. Whether all parts received from the supplier are or were being used to fulfill parts requests from dealers or whether some recall remedy parts are or were being stockpiled (if yes, explain what decisions are involved in determining stockpile quantities and distribution to dealers).
- 11. Provide the following:
 - a. All communications between Chrysler, Mopar, and/or the remedy part(s) supplier(s) regarding parts production rates;
 - b. All communications between Chrysler, Mopar, and/or the remedy part(s) supplier(s) regarding production necessary to meet recall completion targets (e.g., parts needed to compete the recalls within one year, two years, ten years, etc.); and
 - c. All communications between Chrysler, Mopar, and/or the remedy part(s) supplier(s) regarding costs associated with different rates of parts production.
- 12. Describe the dealer parts ordering process for recalls in general, and then in detail for recalls 13V528 and 13V529, including any restrictions or limits on the volume of parts that a dealer may order. If the parts ordering process, restrictions, and/or limits changed for either of these recalls at any time, please identify each change and describe the reason(s) for each change.
- 13. What process or procedure was available to dealers to assist in the managing the remedy part(s) demand and supply for the subject recalls? Describe that process or procedure in detail and produce

copies of any documents demonstrating or explaining that process or procedure and state when they were provided to dealers.

- 14. According to the last quarterly reports Chrysler filed with NHTSA on the subject recalls 13V-528 and 13V-529, the completion rates were 20.7 percent and 23.7 percent, respectively. Identify any measures Chrysler may be planning or that Chrysler has executed to increase the completion rates for the subject recalls. Produce copies of any documents that evidence Chrysler's plans or that reflect the measures it has taken above and beyond the required owner notifications it issued on or around January 6, 2014.
- 15. 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 defect or the administration or execution of the subject recalls:
 - a. Consumer complaints, including those from fleet operators, received on or after January 6, 2014;
 - b. Field reports, including dealer field reports, related to incidents or claims occurring on or after January 6, 2014;
 - c. Reports involving a crash, injury or fatality, related to incidents or claims occurring on or after January 6, 2014;
 - d. Property damage claims, related to incidents or claims occurring on or after January 6, 2014; and
 - e. Third-party arbitration proceedings where Chrysler is or was a party to the arbitration, and related to incidents or claims occurring on or after January 6, 2014; and
 - f. Lawsuits, both pending and closed, in which Chrysler is or was a defendant or codefendant, and that relate to incidents or claims occurring on or after January 6, 2014.

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. For items "e" and "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.

- 16. Separately, for each item (complaint, report, claim, notice, or matter) within the scope of your response to Request No. 15, state the following information:
 - a. Chrysler's file number or other identifier used;
 - b. The category of the item, as identified in Request No. 15 (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 make, 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. If crash is alleged, provide the date the recall inspection was completed and the date the recall part(s) were ordered for that VIN. For vehicles that have not been returned for recall completion, state "NA.":
- k. Whether property damage is alleged;
- 1. Number of alleged injuries, if any; and
- m. Number of alleged fatalities, if any.

Provide this information in Microsoft Access 2010, or a compatible format, entitled "REQUEST NUMBER 15 DATA." See Enclosure 1, Data Collection Disc, for a pre-formatted table in which to provide responsive information.

- 17. Produce copies of all documents related to each item within the scope of Request No. 15. Organize the documents separately by category (i.e., consumer complaints, field reports, etc.) and describe the method Chrysler used for organizing the documents.
- 18. Provide Chrysler's assessment of its execution and administration of these two recalls, including an explanation, where applicable, of the rationale or logic used to support any administrative or logistical decisions made as to parts availability and replacement.

Legal Authority for This Request

This letter is being sent to Chrysler pursuant to 49 U.S.C. § 30166, which authorizes NHTSA to conduct any investigation that may be necessary to enforce Chapter 301 of Title 49 and to request reports and the production of things.

Civil Penalties

Chrysler's failure to respond promptly and fully to this letter could subject Chrysler to civil penalties pursuant to 49 U.S.C. § 30165 or lead to an action for injunctive relief pursuant to 49 U.S.C. § 30163. (Other remedies and sanctions are available as well.) The Vehicle Safety Act, as amended, 49 U.S.C. § 30165(a)(3), provides for civil penalties of up to \$7,000 per violation per day, with a maximum of \$35,000,000 for a related series of daily violations, for failing or refusing to perform an act required under 49 U.S.C. § 30166. This includes failing to respond completely, accurately, and in a timely manner to ODI information requests. The maximum civil penalty of \$7,000 per violation per day is established by 49 CFR 578.6(a)(3). The maximum civil penalty of \$35,000,000 for a related series of daily violations of 49 U.S.C. § 30166 is authorized by 49 U.S.C. § 30165(a)(3) as amended by § 31203(a)(1)(B) of the Moving Ahead for Progress in the 21st Century Act, Public Law 112-141.

If Chrysler cannot respond to any specific request or subpart(s) thereof, please state the reason why it is unable to do so. If on the basis of attorney-client, attorney work product, or other privilege, Chrysler does not submit one or more requested documents or items of information in response to this information request, Chrysler must provide a privilege log identifying each document or item withheld, and stating the date, subject or title, the name and position of the person(s) from, and the person(s) to whom it was sent, and the name and position of any other recipient (to include all carbon copies or blind carbon copies), the nature of that information or material, and the basis for the claim of privilege and why that privilege applies.

Confidential Business Information

All business confidential information must be submitted directly to the Office of Chief Counsel as described in the following paragraph and should not be sent to this office. In addition, do not submit any business confidential information in the body of the letter submitted to this office. Please refer to AQ14-003 in Chrysler's response to this letter and in any confidentiality request submitted to the Office of Chief Counsel.

If Chrysler claims that any of the information or documents provided in response to this information request constitute confidential commercial material within the meaning of 5 U.S.C. § 552(b)(4), or are protected from disclosure pursuant to 18 U.S.C. § 1905, Chrysler must submit supporting information together with the materials that are the subject of the confidentiality request, in accordance with 49 CFR Part 512, as amended, to the Office of Chief Counsel (NCC-111), National Highway Traffic Safety Administration, Room W41-227, 1200 New Jersey Avenue, S.E., Washington, D.C. 20590. Chrysler is required to submit two copies of the documents containing allegedly confidential information (except only one copy of blueprints) and one copy of the documents from which information claimed to be confidential has been deleted. Please remember that the phrase "ENTIRE PAGE CONFIDENTIAL BUSINESS INFORMATION" or "CONTAINS CONFIDENTIAL BUSINESS INFORMATION" (as appropriate) must appear at the top of each page containing information claimed to be confidential, and the information must be clearly identified in accordance with 49 CFR 512.6. If you submit a request for confidentiality for all or part of your response to this IR, that is in an electronic format (e.g., CD-ROM), your request and associated submission must conform to the new requirements in NHTSA's Confidential Business Information Rule regarding submissions in electronic formats. See 49 CFR 512.6(c) (as amended by 72 Fed. Reg. 59434 (October 19, 2007)).

If you have any questions regarding submission of a request for confidential treatment, contact Otto Matheke, Senior Attorney, Office of Chief Counsel at otto.matheke@dot.gov or (202) 366-5253.

Due Date

Chrysler's response to this letter, in duplicate, together with a copy of any confidentiality request, must be submitted to this office by November 21, 2014. Chrysler's response must include all non-confidential attachments and a redacted version of all documents that contain confidential information. If Chrysler finds that it is unable to provide all of the information requested within the time allotted, Chrysler must request an extension from me at (202) 366-9525 no later than five business days before the response due date. If Chrysler is unable to provide all of the information requested by the original deadline, it must submit a partial response by the original deadline with whatever information Chrysler then has available, even if an extension has been granted.

Please send an email notification to Robert Garris at Robert.Garris@dot.gov and to ODI_IRresponse@dot.gov when Chrysler submits its response. If a request for confidential treatment was made for the response, please so state and provide the details of any package tracking information. If you have any technical questions concerning this matter, please call Robert Garris of my staff at (202) 366-9525.

Sincerely

Jennifer Timian, Chief

Recall Management Division Office of Defects Investigation

Enclosure 1: Preformatted Data Collection Disc

Enclosure 2: VOQ list

cc: Steve Williams

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13V-529: (Qtv.: 777)
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