



March 9, 2015

Ms. Jennifer Timian, Chief
Recall Management Division
U.S. Department of Transportation

National Highway Traffic Safety Administration (NHTSA)
Office of Defects Investigation (ODI)
Room W48-302
1200 New Jersey Avenue SE
Washington, D.C. 20590

Reference: NVS-215rwg; AQ14-003

Dear Ms. Timian:

Attached is FCA US LLC's updated response to the referenced inquiry. In performing the analysis and reaching conclusions, and by providing the information contained herein, FCA US LLC is not waiving its claim to attorney work product and attorney-client privileged communications.

Sincerely,

A handwritten signature in black ink, appearing to read 'Philip Hartnagel', is written over the word 'Sincerely,'. The signature is fluid and cursive, with a long horizontal line extending to the right.

Philip Hartnagel

Attachment and Enclosures

Ms. Jennifer Timian
Reference: NVS-215rwg; AQ14-003
March 9, 2015

ATTACHMENT

Page 1 of 19

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).

On December 15, 2014 Chrysler Group LLC changed its name to FCA US LLC.

Note: Unless indicated otherwise in the response to a question, this document contains information up to November 19, 2014, the date this information request was created.

1. **State, by model and model year, the number of the 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 return 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;**
 - l. **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."

Amended Response:

- A1. The following summary table identifies the production data for all 2003 – 2012 MY RAM vehicles manufactured for sale or lease in the United States (US) related to Safety Recalls N49 (13V-529) and N62 (13V-528).

Ms. Jennifer Timian
 Reference: NVS-215rwg; AQ14-003
 March 9, 2015

ATTACHMENT

Model/Model Year	2003	2004	2005	2006	2007	2008	2009	2010	2011	2012	Grand Total
RAM 1500 LARAMIE MEGA CAB 4X4				2,430		1,103					3,533
RAM 1500 MEGA CAB 4X4						2,674					2,674
RAM 1500 SLT MEGA CAB 4X4				8,007							8,007
RAM 2500 LARAMIE CREW CAB 4X4								5,144			5,144
RAM 2500 LARAMIE MEGA CAB 4X4				6,078		3,506		1,727			11,311
RAM 2500 LARAMIE QUAD CAB 4X4				11,485		4,691					16,176
RAM 2500 LARAMIE REG CAB 4X4				122							122
RAM 2500 MEGA CAB 4X4						4,875					4,875
RAM 2500 QUAD CAB PICKUP	72,109	85,554									157,663
RAM 2500 REG. CAB PICKUP	8,946	8,861									17,807
RAM 2500 SLT CREW CAB 4X4								14,429			14,429
RAM 2500 SLT MEGA CAB 4X4				15,990				1,678			17,668
RAM 2500 SLT QUAD CAB 4X4				61,058		26,924					87,982
RAM 2500 SLT REG CAB 4X4				4,084		1,206		1,075			6,365
RAM 2500 ST CREW CAB 4X4								5,094			5,094
RAM 2500 ST QUAD CAB 4X4				6,639		7,941					14,580
RAM 2500 ST REG CAB 4X4				2,660		2,712		1,332			6,704
RAM 3500 LARAMIE CREW CAB 4X4								4,361			4,361
RAM 3500 LARAMIE MEGA CAB 4X4				3,880		3,803		1,856			9,539
RAM 3500 LARAMIE QUAD CAB 4X4				7,053		4,254					11,307
RAM 3500 LARAMIE REG CAB 4X4				74							74
RAM 3500 MEGA CAB 4X4						2,810					2,810
RAM 3500 QUAD CAB PICKUP	29,548	36,370									65,918
RAM 3500 QUAD CHASSIS CAB 4X2						800		140			940
RAM 3500 QUAD CHASSIS CAB 4X4						2,830		757			3,587
RAM 3500 REG CHASSIS CAB 4X2						1,422		180			1,602
RAM 3500 REG CHASSIS CAB 4X4						2,315		499			2,814
RAM 3500 REG. CAB PICKUP	1,591	1,929									3,520
RAM 3500 SLT CREW CAB 4X4								5,446			5,446
RAM 3500 SLT MEGA CAB 4X4				6,594				818			7,412
RAM 3500 SLT QUAD CAB 4X4				24,631		11,465					36,096
RAM 3500 SLT REG CAB 4X4				1,462		315		145			1,922
RAM 3500 ST CREW CAB 4X4								1,838			1,838
RAM 3500 ST QUAD CAB 4X4				1,326		1,725					3,051
RAM 3500 ST REG CAB 4X4				711		293		138			1,142
RAM 4X2 3500 CREW CAB CHASSIS									565	749	1,314
RAM 4X2 3500 QUAD CAB CHASSIS					1,820		242				2,062
RAM 4X2 3500 REG CAB CHASSIS					4,269		482		990	1,197	6,938
RAM 4X4 3500 CREW CAB CHASSIS								2,868	4,325		7,193
RAM 4X4 3500 QUAD CAB CHASSIS					4,518		921				5,439
RAM 4X4 3500 REG CAB CHASSIS					5,472		982	2,112	2,399		10,965
RAM LARAMIE 4X4 1500 MEGA CAB					944						944
RAM LARAMIE 4X4 2500 CREW CAB								7,512	3,010		10,522
RAM LARAMIE 4X4 2500 MEGA CAB					4,252		1,293	3,198	1,232		9,975
RAM LARAMIE 4X4 2500 QUAD CAB					5,301		1,733				7,034
RAM LARAMIE 4X4 3500 CREW CAB								6,985	9,838		16,823
RAM LARAMIE 4X4 3500 MEGA CAB					3,728		1,338	3,288	3,944		12,298
RAM LARAMIE 4X4 3500 QUAD CAB					5,855		1,789				7,644
RAM POWERWAGON 4X4 2500 CREW CAB								916	437		1,353
RAM PREMIUM 4X4 2500 CREW CAB								1,568	1,360		2,928
RAM PREMIUM 4X4 2500 MEGA CAB								661	683		1,344
RAM PREMIUM 4X4 3500 CREW CAB								1,699	6,243		7,942
RAM PREMIUM 4X4 3500 MEGA CAB								883	3,718		4,601
RAM SLT 2500 QUAD CAB PICKUP			66,776								66,776
RAM SLT 2500 REG. CAB PICKUP			4,006								4,006
RAM SLT 3500 QUAD CAB PICKUP			32,909								32,909
RAM SLT 3500 REG. CAB PICKUP			1,247								1,247
RAM SLT 4X4 1500 MEGA CAB					3,889						3,889
RAM SLT 4X4 2500 CREW CAB								13,306	6,224		19,530
RAM SLT 4X4 2500 MEGA CAB					8,610			1,604	548		10,762
RAM SLT 4X4 2500 QUAD CAB					42,261		11,984				54,245
RAM SLT 4X4 2500 REG CAB								1,007	586		1,593
RAM SLT 4X4 2500 REG. CAB					2,153		812				2,965
RAM SLT 4X4 3500 CREW CAB								4,730	7,072		11,802
RAM SLT 4X4 3500 MEGA CAB					4,844			836	1,119		6,799
RAM SLT 4X4 3500 QUAD CAB					20,734		4,932				25,666
RAM SLT 4X4 3500 REG CAB					1,053		127	132	224		1,536
RAM ST 2500 QUAD CAB PICKUP			4,568								4,568
RAM ST 2500 REG. CAB PICKUP			3,469								3,469
RAM ST 3500 QUAD CAB PICKUP			1,252								1,252
RAM ST 3500 REG. CAB PICKUP			568								568
RAM ST 4X4 2500 CREW CAB								11,518	7,025		18,543
RAM ST 4X4 2500 QUAD CAB					3,555		5,277				8,832
RAM ST 4X4 2500 REG CAB								1,712	1,141		2,853
RAM ST 4X4 2500 REG. CAB					2,361		1,750				4,111
RAM ST 4X4 3500 CREW CAB								6,367	17,530		23,897
RAM ST 4X4 3500 QUAD CAB					935		1,176				2,111
RAM ST 4X4 3500 REG CAB					403		139	248	935		1,725
RAM SXT 4X4 2500 MEGA CAB								1,943			1,943
RAM SXT 4X4 3500 MEGA CAB								968			968

The detailed response that lists the recall completion data is provided in Enclosure 1 as a Microsoft Access 2010 table titled "AQ14-003 - RECALL COMPLETION DATA.accdb"

Ms. Jennifer Timian
Reference: NVS-215rwg; AQ14-003
March 9, 2015

ATTACHMENT

Page 4 of 19

Amended Response:

- A1. The following summary table identifies the production data for all 2003 – 2012 MY RAM vehicles manufactured for sale or lease in the United States (US) related to Safety Recalls N49 (13V-529) and N62 (13V-528).

Ms. Jennifer Timian
 Reference: NVS-215rwg; AQ14-003
 March 9, 2015

ATTACHMENT

Model/Model Year	2003	2004	2005	2006	2007	2008	2009	2010	2011	2012	Grand Total
RAM 1500 LARAMIE MEGA CAB 4X4				2,430		1,103					3,533
RAM 1500 MEGA CAB 4X4						2,674					2,674
RAM 1500 SLT MEGA CAB 4X4				8,007							8,007
RAM 2500 LARAMIE CREW CAB 4X4								5,144			5,144
RAM 2500 LARAMIE MEGA CAB 4X4				6,078		3,506		1,727			11,311
RAM 2500 LARAMIE QUAD CAB 4X4				11,485		4,691					16,176
RAM 2500 LARAMIE REG CAB 4X4				122							122
RAM 2500 MEGA CAB 4X4						4,875					4,875
RAM 2500 QUAD CAB PICKUP	72,109	85,554									157,663
RAM 2500 REG. CAB PICKUP	8,946	8,861									17,807
RAM 2500 SLT CREW CAB 4X4								14,429			14,429
RAM 2500 SLT MEGA CAB 4X4				15,990				1,678			17,668
RAM 2500 SLT QUAD CAB 4X4				61,058		26,924					87,982
RAM 2500 SLT REG CAB 4X4				4,084		1,206		1,075			6,365
RAM 2500 ST CREW CAB 4X4								5,094			5,094
RAM 2500 ST QUAD CAB 4X4				6,639		7,941					14,580
RAM 2500 ST REG CAB 4X4				2,660		2,712		1,332			6,704
RAM 3500 LARAMIE CREW CAB 4X4								4,361			4,361
RAM 3500 LARAMIE MEGA CAB 4X4				3,880		3,803		1,856			9,539
RAM 3500 LARAMIE QUAD CAB 4X4				7,053		4,254					11,307
RAM 3500 LARAMIE REG CAB 4X4				74							74
RAM 3500 MEGA CAB 4X4						2,810					2,810
RAM 3500 QUAD CAB PICKUP	29,548	36,370									65,918
RAM 3500 QUAD CHASSIS CAB 4X2						800		140			940
RAM 3500 QUAD CHASSIS CAB 4X4						2,830		757			3,587
RAM 3500 REG CHASSIS CAB 4X2						1,422		180			1,602
RAM 3500 REG CHASSIS CAB 4X4						2,315		499			2,814
RAM 3500 REG. CAB PICKUP	1,591	1,929									3,520
RAM 3500 SLT CREW CAB 4X4								5,446			5,446
RAM 3500 SLT MEGA CAB 4X4				6,594				818			7,412
RAM 3500 SLT QUAD CAB 4X4				24,631		11,465					36,096
RAM 3500 SLT REG CAB 4X4				1,462		315		145			1,922
RAM 3500 ST CREW CAB 4X4								1,838			1,838
RAM 3500 ST QUAD CAB 4X4				1,326		1,725					3,051
RAM 3500 ST REG CAB 4X4				711		293		138			1,142
RAM 4X2 3500 CREW CAB CHASSIS									565	749	1,314
RAM 4X2 3500 QUAD CAB CHASSIS					1,820		242				2,062
RAM 4X2 3500 REG CAB CHASSIS					4,269		482		990	1,197	6,938
RAM 4X4 3500 CREW CAB CHASSIS								2,868	4,325		7,193
RAM 4X4 3500 QUAD CAB CHASSIS					4,518		921				5,439
RAM 4X4 3500 REG CAB CHASSIS					5,472		982	2,112	2,399		10,965
RAM LARAMIE 4X4 1500 MEGA CAB					944						944
RAM LARAMIE 4X4 2500 CREW CAB								7,512	3,010		10,522
RAM LARAMIE 4X4 2500 MEGA CAB					4,252		1,293	3,198	1,232		9,975
RAM LARAMIE 4X4 2500 QUAD CAB					5,301		1,733				7,034
RAM LARAMIE 4X4 3500 CREW CAB								6,985	9,838		16,823
RAM LARAMIE 4X4 3500 MEGA CAB					3,728		1,338	3,288	3,944		12,298
RAM LARAMIE 4X4 3500 QUAD CAB					5,855		1,789				7,644
RAM POWERWAGON 4X4 2500 CREW CAB								916	437		1,353
RAM PREMIUM 4X4 2500 CREW CAB								1,568	1,360		2,928
RAM PREMIUM 4X4 2500 MEGA CAB								661	683		1,344
RAM PREMIUM 4X4 3500 CREW CAB								1,699	6,243		7,942
RAM PREMIUM 4X4 3500 MEGA CAB								883	3,718		4,601
RAM SLT 2500 QUAD CAB PICKUP			66,776								66,776
RAM SLT 2500 REG. CAB PICKUP			4,006								4,006
RAM SLT 3500 QUAD CAB PICKUP			32,909								32,909
RAM SLT 3500 REG. CAB PICKUP			1,247								1,247
RAM SLT 4X4 1500 MEGA CAB					3,889						3,889
RAM SLT 4X4 2500 CREW CAB								13,306	6,224		19,530
RAM SLT 4X4 2500 MEGA CAB					8,610			1,604	548		10,762
RAM SLT 4X4 2500 QUAD CAB					42,261		11,984				54,245
RAM SLT 4X4 2500 REG CAB								1,007	586		1,593
RAM SLT 4X4 2500 REG. CAB					2,153		812				2,965
RAM SLT 4X4 3500 CREW CAB								4,730	7,072		11,802
RAM SLT 4X4 3500 MEGA CAB					4,844			836	1,119		6,799
RAM SLT 4X4 3500 QUAD CAB					20,734		4,932				25,666
RAM SLT 4X4 3500 REG CAB					1,053		127	132	224		1,536
RAM ST 2500 QUAD CAB PICKUP			4,568								4,568
RAM ST 2500 REG. CAB PICKUP			3,469								3,469
RAM ST 3500 QUAD CAB PICKUP			1,252								1,252
RAM ST 3500 REG. CAB PICKUP			568								568
RAM ST 4X4 2500 CREW CAB								11,518	7,025		18,543
RAM ST 4X4 2500 QUAD CAB					3,555		5,277				8,832
RAM ST 4X4 2500 REG CAB								1,712	1,141		2,853
RAM ST 4X4 2500 REG. CAB					2,361		1,750				4,111
RAM ST 4X4 3500 CREW CAB								6,367	17,530		23,897
RAM ST 4X4 3500 QUAD CAB					935		1,176				2,111
RAM ST 4X4 3500 REG CAB					403		139	248	935		1,725
RAM SXT 4X4 2500 MEGA CAB								1,943			1,943
RAM SXT 4X4 3500 MEGA CAB								968			968

The detailed response that lists the recall completion data is provided in Enclosure 1 as a Microsoft Access 2010 table titled "AQ14-003 - RECALL COMPLETION DATA.accdb"

An inspection Labor Operation code (“LOP”) was established for each of these two campaigns. The purpose of an inspection LOP was to check each of the subject vehicles to determine whether a specific vehicle had the suspect steering linkage, since a subject vehicle could have been manufactured with the suspect steering linkage, or received the suspect steering linkage due to service work (i.e., steering system replacement). When a vehicle arrived at a dealership, the service writer was instructed to inspect the steering linkage to determine whether the suspect steering linkage was installed on the vehicle. If a steering linkage other than the suspect steering linkage was installed on the vehicle, no further action (i.e., no repair) was required and the inspection LOP was utilized to reimburse the dealer for time spent, and the recall was marked as “Complete” for that vehicle. If the suspect steering linkage was installed on the vehicle, the vehicle was taken into the service garage for the recall repair. The inspection LOP was not to be utilized for vehicles with the suspect steering linkage. The recall would be marked “Complete” for vehicles with the suspect steering linkage when the repair had been performed.

The inspection LOPs were only setup to allow the dealership to quickly determine if the vehicle actually required the recall repair. If the vehicle did not have the suspect steering linkage installed, and thus did not require steering linkage replacement, the customer could leave the dealership immediately and the recall was properly marked complete. This inspection LOP limited the inconvenience to the customer, and allowed service technicians to focus only on vehicles that required the recall remedy.

FCA US LLC (formerly known as Chrysler Group LLC) (“Chrysler”) did update the RECALL COMPLETION DATA file to include the dates for vehicles with the inspection LOP and where appropriate the recall repair LOP.

- 2. Identify all notices, communications, or instructions Chrysler issued, transmitted, or otherwise make 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 or 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 of 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 (d).

- A2. The detailed response that lists the notices, communications, or instructions Chrysler issued to its dealers relating to 13V-528 (N62) or 13V529 (N49) is provided in Enclosure 2 - Question #2 Response.xlsx.

Amended Response:

- A2. The detailed response that lists the notices, communications, or instructions Chrysler issued to its dealers relating to 13V-528 (N62) or 13V529 (N49) is provided in Enclosure 2 - Question #2 Response.xlsx.

At some point during its investigation, NHTSA obtained screen prints directly from a Chrysler dealer relating to the part numbers associated with these campaigns. NHTSA subsequently provided these screen shots to Chrysler. These screen prints show the original steering linkage part number (Part #CBUEN491AA) and the steering linkage installation package were on restriction at the point in time when the screen shots were taken. The screen shots provided by NHTSA to Chrysler reflect data available in Mopar systems, but are not notices, communications, or instructions. This data is not affirmatively provided by Mopar to dealers in the screen print format. The Chrysler dealers access the online parts ordering system via DealerCONNECT. Based on the dealer's inquiry, DealerCONNECT then retrieves and displays the requested data. When a Chrysler dealer wants to order a part or check on part availability, if a restriction is placed on the part, the parts order screen will display the restriction. The screen prints provided by NHTSA show the original steering linkage (Part #CBUEN491AA) and the steering linkage installation package were subject to restriction at some point in time.

- 3. Describe the process(es) for drafting, reviewing, and approving 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 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.

- A3. Chrysler's process for dealer communications relating to recalls includes the following:

Dealer Advance Communications – Chrysler sends to dealers, via email, a New Safety Recall Advance Communication (“NSRAC”) when Chrysler submits a Defect Information Report. The NSRAC is a brief statement informing dealers of the safety recall, the scope of the recall and the potential consequence of the safety defect, so that dealers may consistently and accurately respond to customer inquiries. NSRAC communications are also available to dealers through DealerCONNECT.

NSRACs are drafted by the Recall Administration Team Service & Government Specialists, based on information available at the time Chrysler submits its Defect Information Report. NSRACs are reviewed and approved by the Manager of Recall Administration.

Dealer Repair Instructions – The detailed repair procedure dealer technicians are instructed to utilize in performing the recall repair. The dealer instructions include information detailing the process for the dealer to be reimbursed for recall repairs.

The dealer instructions are drafted by the Recall Administration Team Service & Government Specialists. The Specialist works with a service technician to study the time and steps required to perform the recall repair. The Specialist then utilizes the information gathered to generate detailed, step-by-step draft dealer instructions. The draft dealer instructions are then distributed to various groups for review and feedback. The reviewing groups include the following: Recall Administration, Product Investigation, Technical Service Operations, and Engineering. The Specialist incorporates the improvements or corrections, if any, into the final dealer instructions. Final dealer instructions are approved by the Manager of Recall Administration. This same review and approval process is followed for revisions to the dealer instructions, if any.

The final dealer instructions also contain information about parts availability and parts ordering. Because the availability of recall remedy parts are sometimes limited in the early stages of a recall campaign, as was the case with the subject recalls, MOPAR instituted an Automatic Reorder (“ARO”) program with its dealers. The ARO program was intended to optimize the flow of remedy parts to vehicle owners through tighter supply chain management controls that were instituted by MOPAR. In short, these controls were meant to minimize the accumulation of unused remedy parts in one dealer’s inventory when another dealer’s customer needed the remedy part. The details of the ARO program are memorialized in a MOPAR communication to dealers on or about July 11, 2014, which, is included in Enclosure 3 – ARO Campaign Enhanced.pdf.

Additional information on recall campaign processes is also included in Chrysler’s Dealer Policy Manual (“DPM”). The DPM provides general guidelines for dealers in a wide variety of circumstances, including parts ordering and claims reimbursement (warranty and recall). Chrysler’s DPM is included in ENCLOSURE 3 CONF BUS INFO.

A detailed explanation of the process that led to the February 27, 2014 MOPAR communication is provided in response to Q5 through Q8.

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 action to supply a different remedy part or instruction and conduct a “re-recall.”

- A4. Problems or concerns with the adequacy of a recall remedy post-launch are rare. In addition to the multiple ways Chrysler becomes aware of any type of vehicle concern (customer complaints, warranty data, field reports, etc.), Chrysler’s Recall Administration Team maintains a close working relationship with field personnel, and often receive direct communications regarding the status of recall execution.

If the concern relates to the design and/or manufacturing of the recall remedy, Engineering and/or MOPAR Supplier Quality are responsible for investigating. Engineering is responsible for investigating part design issues, while MOPAR Supplier Quality is responsible for investigating supplier part manufacturing issues. If the concern relates to dealer service instructions, the Recall Administration Team Service & Government Specialists will execute any necessary revisions, upon the approval of the Manager of Recall Administration.

Depending on the nature of the remedy improvement required, one or more groups may be involved in the discussion and/or decision to supply a different remedy part, dealer instructions or conduct a new recall. These groups may include Vehicle Safety Office, MOPAR Supplier Quality, Engineering and/or the Vehicle Regulations Committee.

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?

- A5. The Chrysler Vehicle Safety Office investigation team was informed via email from the Canadian Vehicle Safety Office on January 24, 2014 of an alignment issue involving a single recall N49 remedy part arriving at a dealership misaligned. On January 28, 2014, MOPAR Supplier Quality informed Powers & Sons of the misalignment part received at a Canadian dealership. This notification triggered Supplier Quality to immediately conduct a full Process Audit of the supplier at the manufacturing location in the first week of February 2014.

No supplier process or quality condition concerns were discovered during the Process Audit.

Concurrent with the supplier manufacturing Process Audit, Chrysler Engineering also audited the remedy part design and determined that a design validation change needed to be implemented. Engineering updated the part drawing that labeled the end-to-end alignment ball stud as a "Critical Characteristic" along with identifying a minimum force that could cause a misalignment of the end-to-end ball stud orientation. This drawing update occurred on April 3, 2014. Since "Critical Characteristics" need to be validated during the manufacturing process, this required the supplier to improve its manufacturing process and implement additional quality controls on the remedy parts production. Because the parts produced prior to the manufacturing improvements could have the potential for misalignment of the end-to-end ball stud orientation, Chrysler issued a notice to all dealers to return any available remedy parts in inventory to MOPAR for verification of the alignment of the end-to-end ball stud orientation. This dealer communication document was provided to dealers on February 27, 2014 from MOPAR Parts.

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.

A6. As noted in A5, MOPAR Supplier Quality, Engineering and the supplier, Powers & Sons were all involved in investigating whether a quality concern existed with the recall remedy parts.

7. When did Chrysler decide its concerns about the recall remedy part(s) in 13V-528 and 13V-529 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?

A7. A second quality suspect part was discovered at a dealership on February 25, 2014. A decision was made on February 25, 2014 and a Quality Control Message (QCM) was sent to the entire MOPAR and dealer network to stop shipments of parts to the dealerships. A dealer email was generated on February 27, 2014 for return of unused remedy parts in inventory to MOPAR for verification of the alignment of the end-to-end ball stud orientation.

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, make that decision?

A8. MOPAR Supplier Quality assisted in recovering the parts at dealerships as well as field Parts Distribution Centers (PDCs) for quality verification. After extensive quality verification on over 3,448 field returned parts and 21,218 production parts

at the PDCs, it was determined that no parts were found with the tie rod out of alignment. The recertified parts were labeled with a new part number and inventories were built up at the field PDCs to service the dealerships for recall 13V-528 and 13V-529. The decision to reinstate the recall remedy occurred on March 17, 2014, with a dealer email informing dealers that limited quantities of the inspected steering linkage assemblies will be available for distribution the week of April 14, 2014. The groups involved in making the decision to reinstate the recall remedy were MOPAR Supplier Quality, Engineering and Recall Administration.

9. Identify the suppliers/manufacturers involved in producing the remedy part(s) for recalls 13V-528 and 13V-529. 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.

A9. The detailed response that identifies the supplier/manufacturers involved in producing the remedy part(s) for recalls 13V-528 and 13V-529 is provided in Enclosure 9 CONF BUS INFO.

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).**

A10. The detail responsive to Question 10 is provided in Enclosure 10 – Recall Parts.xlsx. Also see Chrysler's response to Q3 pertaining to the ARO process.

Amended Response:

A10. The detail responsive to Question 10 is provided in Enclosure 10 – Recall Parts Update.xlsx. Column E has been updated to acknowledge parts restriction during initial recall release. Also see Chrysler's response to Q3 pertaining to the ARO process.

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 complete 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.

A11. All communications responsive to Q11 are included in Enclosure 11 – CONF BUS INFO.

12. Describe the dealer parts ordering process for recalls in general, and then in detail for recalls 13V-528 and 13V-529, 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.

A12. Chrysler refers to its responses to Q3 through Q9 for the dealer parts ordering process for recalls in the ordinary course of business and specific to recalls 13V-528 and 13V-529.

Amended Response:

A12. Chrysler refers to its responses to Q3 through Q9 for the dealer parts ordering process for recalls in the ordinary course of business and specific to recalls 13V-528 and 13V-529.

Chrysler acknowledges the parts to support both 13V-528 and 13V-529 were restricted during the initial phase of the campaigns. The parts restriction was continued during and after the quality hold on steering linkages with Part #CBUEN491AA. The part restriction was only for a specific part level (Part #CBUEN491AA) once the quality hold was removed. This was to assure all suspect steering linkages were recertified by the supplier. Once the recertification occurred, the steering linkage part number was changed (Part #CBUEN491AB). If a dealer placed an order for Part #CBUEN491AA, the parts orders screen would continue to display the part restriction for that specific part number, however, Part #CBUEN491AB would be available.

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.

A13. In addition to the ARO process described in response to Q3, Chrysler dealers were instructed on the expediting process provided on the dealer order system in November 2013. The document detailing the expediting process is provided in Enclosure 13 CONF BUS INFO.

Amended Response:

A13. In addition to the ARO process described in response to Q3, Chrysler dealers were instructed on the expediting process provided on the dealer order system in November 2013. The document detailing the expediting process is provided in Enclosure 13 CONF BUS INFO.

At the time of the recall repair launch, parts were available for ordering by all dealers, as long as Mopar had stock in inventory. On February 26, 2014, the original steering linkage parts were placed on restriction due to the quality hold. At this time, the Expediting Process could be utilized to assist dealers with ordering parts. As for any Mopar part on restriction, the dealer could call Expediting, provide a VIN, and the part would be sent to the requesting dealer. This Expediting Process worked, however, there was an opportunity for confusion if the part number requested by the dealer was the original steering linkage (Part #CBUEN491AA) which was on quality hold. If the Expediting Agent attempted to order only this part number, the part restriction would have still been applicable, and prevented successful expediting of a steering linkage part. If, however, the dealer ordered the recertified steering linkage part number or the new production part number, via the Expediting Process, the dealer would have received the proper part.

14. According to the last quarterly reports Chrysler filed with NHTSA on the subject recalls 13V-528 and 13V-519, the completion rates were 20.7 percent and 23.7 percent, respectively. Identify and 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.

A14. Chrysler executed a follow-up recall notice mailing to all owners with the recall status of "OPEN" in June 2014. The follow-up recall notice mailing improved the recall completion rate for 13V-528 (N62) approximately 3 percent in July 2014. The follow-up recall notice mailing improved the recall completion rate for 13V-529 (N49) approximately 8 percent in July 2014. As of November 24, 2014, the recall completion rate for 13V-528 is approximately 28 percent and the completion rate for 13V-529 is approximately 47 percent. The recall completion rate for 13V-528 is lower than the recall completion rate for 13V-529 mainly due

to the age of the vehicles. The vehicles involved in 13V-528 range from 2003 to 2008 model year Ram trucks, while the vehicles involved in 13V-529 range from 2008 to 2012 model year Ram trucks.

Chrysler will continue to review the completion rate for each recall, as Chrysler does for all safety recalls, again in January 2015, and will conduct another follow-up recall notice mailing as needed, for each recall to all owners with the recall status of "OPEN."

A copy of each follow-up recall notice mailing for 13V-528 and 13V-529 are included in Enclosure 14.

- 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;**
 - 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 field report involving the same incident in which a crash occurred are to be counted as a crash reports, 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.

A15. The following summarizes the reports located by Chrysler that relate to, or may relate to, the subject defect or the administration or execution of the subject recalls received on or after January 6, 2014. Chrysler has conducted a reasonable and diligent search of records kept in the ordinary course of business for information responsive to this inquiry.

- a. There are a total of 2,593 consumer complaints, resulting in 2,504 unique VINs.
- b. There are 9 field reports, resulting in 9 unique VINs.
- c. There are 32 crashes involving 20 injuries and one fatality.
- d. There are 32 reports of alleged property damage.
- e. There are zero third-party arbitration proceedings.
- f. There are 45 legal claims.

Due to some complainants providing multiple inputs for the same vehicle, there are 2,538 unique VINs, associated with 2,646 total customer complaints, field reports and legal claims.

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;**
- l. **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."

A16. The subpart (a) through (m) is located in Enclosure 16 – REQUEST NUMBER 15 DATA. As for subpart j, the precise date that the recall part was ordered for a particular vehicle cannot be determined.

Amended Response:

A16. The subpart (a) through (m) is located in Enclosure 16 – REQUEST NUMBER 15 DATA. As for subpart j, the precise date that the recall part was ordered for a particular vehicle cannot be determined.

Chrysler has reviewed the data provided, and confirmed that the subject vehicles alleged to have been in a crash have not had the recall performed.

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 complaint, field reports, etc.) and describe the method Chrysler used for organizing the documents.

A17. Enclosure 17 – CONSUMER COMPLAINTS, FIELD REPORTS & LEGAL CLAIMS contains folders with copies of the available consumer complaints, field reports, legal claims.

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.

A18. Chrysler issued both safety recall N49 (13V-529) and N62 (13V-528) in December 2013. The decision to launch the recall in December 2013 was to start repairing customer's vehicles as quickly as possible and to meet the 60 day recall launch required by NHTSA. This decision to launch the recall in December 2013 was with the risk that the MOPAR stock, at that time, was much lower than the desired MOPAR stock level at the launch of the recall. Normally, Chrysler desires approximately 35% of the total parts required at the time of a recall launch in order to manage the customer demand in the first two to three months after the recall launched. This minimal percentage of available parts assures that dealers and MOPAR will have sufficient quantities of parts to handle the initial demand within the first two to three months after a recall is launched. This stock quantity eliminates backorders on parts associated with recalls and assures Chrysler dealers will have adequate quantities of parts to repair customers vehicles associated with a recall.

Even though the sole supplier of this part, Powers & Sons, was running at maximum production capacity at or near launch, they were not able to achieve Chrysler's desired recall launch part inventory (see Enclosure 9). As a result of launching both the N49 (13V-529) and N62 (13V-528) with a lower than desired part quantity, customers were sometimes informed that parts were not available when scheduling their service appointments. This led not only to customer dissatisfaction but, it is believed, also resulted in a lower recall completion rate to date.

The steering linkage assembly that was utilized in the recalls was a complex system. In order to ensure correct installation of this complex assembly, the remedy part was designed and manufactured as a single assembly for ease of installation at the Chrysler dealerships. This required Chrysler Engineering and the supplier to generate a complete steering linkage assembly including all components from the left tie rod to the right tie rod in order to assist in the service procedure. This allowed the Chrysler service technician the ability to replace the suspect left tie rod with a new steering linkage that eliminated the possibility of misaligning the left tie rod. The new steering linkage assembly incorporated an alignment feature between the inner end tie rod package and the outer end tie rod package preventing a misalignment of the tie rods during assembly on the vehicle. The dealer technician was not required to make any alignment adjustments during the service repair assembly process. However, as a result of the inspection of all field returned parts and production parts, the two field inputs are the only parts established with an alignment issue. It is determined these parts showed evidence of improper handling at the dealership and not a production or MOPAR shipping issue.

Chrysler Recall Administration, MOPAR Purchasing and Engineering all worked with the supplier of the steering linkage assembly, Powers & Sons, to improve the weekly production rate of the subject component. Although not ideal, the weekly production rate of approximately 4,500 steering linkage assemblies was the best production rate the supplier could manufacture. Chrysler requested, on multiple occasions, that the supplier improve their weekly production capacity for the new steering linkage to support the recall. The supplier continued to inform Chrysler their manufacturing facility was at full capacity and, Chrysler's assessment, of utilizing a second supply source was not a viable option.

As for the decision to halt the recall repair due to a possible quality issue with the steering linkage assemblies, Chrysler believes they reacted quickly and appropriately to the issue. In January 2014 Chrysler was informed of a possible quality issue with the single steering linkage assembly. On February 25, 2014, a second suspect steering linkage assembly was found at a dealership. This resulted in Chrysler immediately sending a stop shipment of parts to the dealerships. On February 27, 2014, Chrysler sent a dealer email to all dealers informing them to return stock for quality verification. Chrysler Recall Administration learned of this request late that evening and called NHTSA on February 28, 2014 informing NHTSA of the stop shipment.

Chrysler Recall Administration has reviewed, with MOPAR, the importance of informing the group on any quality issue associated with recall parts and has initiated process changes to effectuate more timely communications between the key stakeholders in the recall process.

Amended Response:

- A18. Chrysler issued both safety recall N49 (13V-529) and N62 (13V-528) in December 2013. The decision to launch the recall in December 2013 was to start repairing customer's vehicles as quickly as possible and to meet the 60 day recall launch required by NHTSA. This decision to launch the recall in December 2013 was with the risk that the MOPAR stock, at that time, was much lower than the desired MOPAR stock level at the launch of the recall. Normally, Chrysler desires approximately 35% of the total parts required at the time of a recall launch in order to manage the customer demand in the first two to three months after the recall launched. This minimal percentage of available parts assures that dealers and MOPAR will have sufficient quantities of parts to handle the initial demand within the first two to three months after a recall is launched. This stock quantity eliminates backorders on parts associated with recalls and assures Chrysler dealers will have adequate quantities of parts to repair customers vehicles associated with a recall.

Even though the sole supplier of this part, Powers & Sons, was running at maximum production capacity at or near launch, they were not able to achieve Chrysler's desired recall launch part inventory (see Enclosure 9). As a result of launching both the N49 (13V-529) and N62 (13V-528) with a lower than desired part quantity, customers were sometimes informed that parts were not available when scheduling their service appointments. This led not only to customer dissatisfaction but, it is believed, also resulted in a lower recall completion rate to date.

The steering linkage assembly that was utilized in the recalls was a complex system. In order to ensure correct installation of this complex assembly, the remedy part was designed and manufactured as a single assembly for ease of installation at the Chrysler dealerships. This required Chrysler Engineering and the supplier to generate a complete steering linkage assembly including all components from the left tie rod to the right tie rod in order to assist in the service procedure. This allowed the Chrysler service technician the ability to replace the suspect left tie rod with a new steering linkage that eliminated the possibility of misaligning the left tie rod. The new steering linkage assembly incorporated an alignment feature between the inner end tie rod package and the outer end tie rod package preventing a misalignment of the tie rods during assembly on the vehicle. The dealer technician was not required to make any alignment adjustments during the service repair assembly process. However, as a result of the inspection of all field returned parts and production parts, the two field inputs are the only parts established with an alignment issue. It is determined these parts showed evidence of improper handling at the dealership and not a production or MOPAR shipping issue.

Chrysler Recall Administration, MOPAR Purchasing and Engineering all worked with the supplier of the steering linkage assembly, Powers & Sons, to improve the weekly production rate of the subject component. Although not ideal, the weekly production rate of approximately 4,500 steering linkage assemblies was the best production rate the supplier could manufacture. Chrysler requested, on

multiple occasions, that the supplier improve their weekly production capacity for the new steering linkage to support the recall. The supplier continued to inform Chrysler their manufacturing facility was at full capacity and, Chrysler's assessment, of utilizing a second supply source was not a viable option.

As for the decision to halt the recall repair due to a possible quality issue with the steering linkage assemblies, Chrysler believes they reacted quickly and appropriately to the issue. In January 2014 Chrysler was informed of a possible quality issue with the single steering linkage assembly. On February 25, 2014, a second suspect steering linkage assembly was found at a dealership. This resulted in Chrysler immediately sending a stop shipment of parts to the dealerships. On February 27, 2014, Chrysler sent a dealer email to all dealers informing them to return stock for quality verification. Chrysler Recall Administration learned of this request late that evening and called NHTSA on February 28, 2014 informing NHTSA of the stop shipment.

Chrysler Recall Administration has reviewed, with MOPAR, the importance of informing the group on any quality issue associated with recall parts and has initiated process changes to effectuate more timely communications between the key stakeholders in the recall process.

Mopar has worked on improving the campaign parts and service parts communication process. One such improvement is assuring the Expediting Agents receive timely and accurate part number information associated with each campaign.

Additionally, Mopar has designated a representative to work directly with Chrysler's Vehicle Safety Office on part management, campaign completion rate projection, as well as facilitating direct and more frequent communication between the two organizations. Mopar has been instructed to immediately notify the Vehicle Safety Office (Recall Administration Manager and staff) of any quality issue relating to recall parts by phone call and email. Mopar is to provide all part stoppage notifications to the Vehicle Safety Office personnel at the same time the information is being provided to the field. This will assure timely notification to NHTSA by the Vehicle Safety Office. The Vehicle Safety Office will review the requirements of proper communication with Mopar on a quarterly basis.

The Vehicle Safety Office has also increased manpower to work directly with Mopar on part management, campaign completion rate projection, as well as facilitating direct and more frequent communication between the two organizations. The additional manpower will also allow the Vehicle Safety Office to provide better overall recall campaign management.