



March 19, 2014

Mr. Scott Yon
Vehicle Integrity Division (VID), NVS-212
U.S. Department of Transportation

National Highway Traffic Safety Administration (NHTSA)
Office of Defects Investigation (ODI)
Room W48-314
1200 New Jersey Avenue SE
Washington, D.C. 20590

Reference: NVS-212ef; EA14-001

Dear Mr. Yon:

Attached is Chrysler Group LLC's response to the referenced inquiry EA14-001. 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.

Sincerely,

A handwritten signature in blue ink that reads "Kristin Kolodge".

Kristin J. Kolodge

Attachment and Enclosures

Note: Unless indicated otherwise in response to a question, this document contains updated PE 13-027 data for vehicle repairs from August 28, 2013 (the PE IR cutoff date) through December 11, 2013 (the sun visor spacer plant implementation date). The information contained in this response is current through February 25, 2014, the date of the EA14-001 information request.

- 1. State, by model and model year, the number of subject vehicles Chrysler has manufactured. 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. Whether the vehicle was equipped with a sunroof;**
 - g. Date warranty coverage commenced; and**
 - h. The State in the United States where the vehicle was originally sold or leased (or delivered for sale or lease).**

Provide the table in Microsoft Access 2010, or a compatible format, entitled "PRODUCTION DATA."

A1. Chrysler Group LLC ("Chrysler") notes that the subject vehicles in response to EA14-001 are 2011 – 2014MY Jeep Grand Cherokee vehicles and 2011- 2014MY Dodge Durango vehicles.

Vehicle Type	MY Total
2011 – 2014 Jeep Grand Cherokee (WK) built through 12/11/2013	543,5798
2011 – 2014 Dodge Durango (WD) built through 12/11/2013	118,309
Total Vehicle Volume = 661,888	

Note: The data in the chart above includes all vehicles built through December 11, 2013.

The detailed response listing the production data as requested in Items (a) through (h) is provided in Enclosure 1- Production Data, "PRODUCTION DATA (EA 14-001).mdb".

- 2. State the number of each of the following, received by Chrysler, or of which Chrysler is otherwise aware, which relate to, or may relate to, the alleged defect in the subject vehicles:**
- a. Consumer complaints, including those from fleet operators;**
 - b. Field reports, including dealer field reports;**
 - c. Reports involving a crash, injury or fatality;**
 - d. Reports involving a fire;**
 - 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 "g" 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 located by Chrysler that relate to, or may relate to, the alleged defect in the subject vehicles. Chrysler has conducted a reasonable and diligent search of records kept in the ordinary course of business for information responsive to this inquiry.
- a. There are a total of four customer complaints related to unique VINs.
 - b. There are no field reports.
 - c. There are no reports involving an injury or fatality.
 - d. Chrysler received 16 inputs in which words associated with fire, by NHTSA's definition, were present relating to unique VINs.
 - e. There are four reports of alleged property damage.
 - f. There are no third-party arbitration proceedings.

- g. There are no lawsuits and four legal claims.
- 3. Separately, for each item (complaint, report, claim, notice, or matter) within the scope of your response to Request No. 2, state the following information:**
- a. Chrysler's file number or other identifier used;**
 - b. The category of the item, as identified in Request No. 2 (i.e., consumer complaint, field report, etc.);**
 - c. Vehicle owner or fleet name (and fleet contact person), 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. Whether property damage is alleged;**
 - k. Number of alleged injuries, if any; and**
 - l. Number of alleged fatalities, if any.**

Provide this information in Microsoft Access 2010, or a compatible format, entitled "REQUEST NUMBER TWO DATA."

- A3. The information requested in items (a) through (l) is provided in the detailed response to Question 2, Enclosure 2 – REQUEST NUMBER TWO DATA, as part of a Microsoft Access 2010 table, and titled "REQUEST NUMBER TWO 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. Enclosure 3 - Consumer Complaints and Legal Claims contains folders with copies of the available consumer complaints, legal claims and legal summaries. Legal summaries are arranged in folders by the claimant name.
- 5. State, by model and model year, a total count for all of the following categories of claims, collectively, that have been paid by Chrysler to date that relate to, or may relate to, the alleged defect in the subject vehicles: warranty claims; extended warranty claims; claims for good will services that were provided; field, zone, or similar adjustments and reimbursements; and warranty claims or repairs made in accordance with a procedure specified in a technical service bulletin or customer satisfaction campaign.**

Separately, for each such claim, state the following information:

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

Provide this information in Microsoft Access 2010, or a compatible format, entitled "WARRANTY DATA."

- A5. The detailed response that lists the warranty claim information as requested in items (a) through (k) is provided in Enclosure 5 – Warranty Claims Narrative, Warranty Data, as a Microsoft Access 2010 table, titled “WARRANTY DATA (EA14-001).mdb”.
- 6. Describe in detail the search criteria used by Chrysler to identify the claims identified in response to Request No. 5, including the labor operations, problem codes, part numbers and any other pertinent parameters used. Provide a list of all labor operations, labor operation descriptions, problem codes, and problem code descriptions applicable to the alleged defect in the subject vehicles. State, by make and model year, the terms of the new vehicle warranty coverage offered by Chrysler on the subject vehicles (i.e., the number of months and mileage for which coverage is provided and the vehicle systems that are covered). Describe any extended warranty coverage option(s) that Chrysler offered for the subject vehicles and state by option, model, and model year, the number of vehicles that are covered under each such extended warranty.**
- A6. The warranty claims identified in response to Q5 were selected by first identifying all potentially applicable Labor Operation Codes (LOPs) relating to the service or replacement of the subject components. These LOPs are provided within Enclosure 7 – Visor LOP Detail. These LOPs were used to search for responsive paid claims relating to the subject vehicles. The process utilized to generate warranty data is the same process as referenced in PE13-027.
- The requested Extended Warranty Sales data has been provided in ENCLOSURE 6 EXTENDED WARRANTY SALES CONF BUS INFO, which has been submitted under separate cover to NHTSA’s Chief Counsel with a request for confidential treatment.
- 7. State the number of each of the following, received by Chrysler, or of which Chrysler is otherwise aware, which relate to, or may relate to, the alleged defect in subject**

vehicles that were manufactured for sale or lease in the United States with the revised sun visor mounting system introduced into vehicle production on December 9, 2013:

- a. Consumer complaints, including those from fleet operators;**
- b. Field reports, including dealer field reports;**
- c. Reports involving a crash, injury or fatality;**
- d. Reports involving a fire;**
- 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 "g" 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.

A7. There are no reports responsive.

- 8. Separately, for each item (complaint, report, claim, notice, or matter) within the scope of your response to Request No. 7, state the following information:**
 - a. Chrysler's file number or other identifier used;**
 - b. The category of the item, as identified in Request No. 7 (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. Whether property damage is alleged;**
 - k. Number of alleged injuries, if any; and**
 - l. Number of alleged fatalities, if any.**

Provide this information in Microsoft Access 2010, or a compatible format, entitled "REQUEST NUMBER SEVEN DATA."

A8. There are no reports responsive.

9. Produce copies of all documents related to each item within the scope of Request No. 7. Organize the documents separately by category (i.e., consumer complaints, field reports, etc.) and describe the method Chrysler used for organizing the documents.

A9. There are no responsive documents.

EA14-001 Summary:

There are 16 unique VINs that relate to, or may relate to, the alleged defect. Four VINs are identified in response to Q2 and 13 additional VINs are identified in response to Q5. Of the four unique VINs Chrysler inspected, all four vehicles experienced conditions related to the alleged defect. The thermal damage was minor and in each case the cause was determined to be a resistive short in the sun visor vanity lamp circuit.

The additional inputs reported in this submission are also representative of localized, minor resistive short damage that was reported in the PE submission. For example, the two vehicles noted in Figures 1 and 2 below were driven to a dealer and repaired under Chrysler's warranty policy. The photo evidence shows the localized, minor damage to the sun visor and/or headliner.



Figure 1- Warranty Claim #163704



Figure 2- Warranty Claim #163704

The four vehicles noted below in Figures 3 through 6 were received as customer complaints and reported to have experienced a fire. These photos also show evidence of localized, minor damage to the sun visor and/or headliner.



Figure 3- CAIR #34319516 Photo 1029312bf.jpg



Figure 4 - CAIR 23961176 Photo 1018501gf.jpg



Figure 5 - CAIR 24234572 Photo 0418421tf.jpg



Figure 6 - CAIR 24401035 Photo 0644271uf.jpg

Note: It is apparent in Figures 5 and 6 that the fire departments also damaged the headliner areas in these vehicles as a part of their response activity.

It is believed that the remaining 10 vehicles repaired under warranty also had localized, minor damage to the sun visor and/or headliner area as a result of a resistive short. A thermal event of greater significance would have required the dealer to report the fire through other means, such as a CAIR, field report or warranty repair pre-authorization. There were no such other reports associated with these warranty claims. Although there are no photos available to definitively assess the thermal damage, these vehicles all received minor repairs under the vehicle's standard warranty. This leads Chrysler to conclude that the thermal damage in these 10 warranty claims was likely similar to, or perhaps less than, the damage observed in Figures 1 through 6.

In summary, as Chrysler noted in its PE response, the random occurrences of improperly repaired vehicles do not always cause a resistive short. If a resistive short does occur, it does not always result in a fire risk due to the variability of the resistive short. An intervention by the vehicle's thermal protection switching strategy may prevent the circuit from overheating and result in only localized, minor damage. As evidenced in the field data submitted during the PE, and now again in this EA submission, the resistive short was often apparent to the vehicle occupants and the resistive short thermal damage was minimal.

Chrysler continues to believe there is no unreasonable risk to motor vehicle safety and this investigation should be closed.

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ENCLOSURE 3

Legal Summaries

MATTER #	1242122
FILE TYPE	Legal Claim
FILE NAME	[REDACTED]
CAIR #	23961176
DATE OF INCIDENT	9/14/13
DATE OF NOTICE	9/18/13
MODEL/MODEL YEAR	2012 Jeep Grand Cherokee Overland 4x4
VIN	1C4RJFCT9CC [REDACTED]
MILEAGE	13,882
OWNER	[REDACTED]
COURT	None
DOCKET #	None
ALLEGED DEFECT	Interior Fire
DESCRIPTION	The owner states that he was driving approximately one half mile from his home to his mailbox when he noticed smoke coming from his left sun visor. As he reached his garage he turned off the vehicle, disconnected the battery and called roadside assistance.
CRASH	No
PROPERTY DAMAGE	Yes
INJURIES	0
FATALITIES	0
ANALYSIS	An inspection ⁴ of the vehicle revealed that the origin of the fire was the wiring harness mounted on the left backside of the headliner. The cause of the fire appears to be a pinched wire.

⁴ The inspection was conducted at the request of counsel in anticipation of litigation and the report is being withheld under a claim of attorney work-product privilege.

MATTER #	1244248
FILE TYPE	Legal Claim
FILE NAME	[REDACTED]
CAIR #	24319516
DATE OF INCIDENT	12/15/13
DATE OF NOTICE	12/16/13
MODEL/MODEL YEAR	2011 Jeep Grand Cherokee Laredo
VIN	1J4RR4GG8BC [REDACTED]
MILEAGE	50,726
OWNER	[REDACTED]
COURT	None
DOCKET #	None
ALLEGED DEFECT	Interior Fire
DESCRIPTION	The owner states that he was driving his vehicle and smelled something burning. He saw smoke and a small flame coming from the mount for the passenger side sun visor. He hit the burning area with his hand and put the fire out.
CRASH	No
PROPERTY DAMAGE	Yes
INJURIES	0
FATALITIES	0
ANALYSIS	An inspection ² of the vehicle revealed the origin of the fire to be the passenger sun visor where the visor mounts to the vehicle. The customer had hail damage to the flat surfaces of the roof repaired in May, 2012 by the dealer. The cause of the fire appears to be a short in the wiring to the sun visor light. The contact is between one of the mounting screws and the wiring.

² The inspection was conducted at the request of counsel in anticipation of litigation and the report is being withheld under a claim of attorney work-product privilege.

MATTER #	1244632
FILE TYPE	Legal Claim
FILE NAME	[REDACTED]
CAIR #	24401035
DATE OF INCIDENT	1/6/14
DATE OF NOTICE	1/7/14
MODEL/MODEL YEAR	2013 Dodge Durango Crew AWD
VIN	1C4RDJDG9DC [REDACTED]
MILEAGE	4,000
OWNER	[REDACTED]
COURT	None
DOCKET #	None
ALLEGED DEFECT	Interior Fire
DESCRIPTION	The owner states that he had been driving for approximately 20 minutes when he saw light coming from the right side dash. He pulled over and opened the right front door at which time he noticed white smoke emitting from the right passenger area. He proceeded to drive to the dealer and the smoke continued to get thicker. He also noticed flames behind the visor. The owner pulled over and called the fire department.
CRASH	No
PROPERTY DAMAGE	Yes
INJURIES	0
FATALITIES	0
ANALYSIS	An inspection ¹ of the vehicle revealed that the origin of the fire appears to be the right front headliner from the overhead console toward the right front vanity visor. The vehicle had prior hail damage repair at which time the headliner was removed and repaired by a third-party repair facility. The owner reported that the overhead front dome lamp had not been operating correctly for some time. The cause of the fire appears to be electrical.

¹ The inspection was conducted at the request of counsel in anticipation of litigation and the report is being withheld under a claim of attorney work-product privilege.

MATTER #	1243820
FILE TYPE	Legal Claim
FILE NAME	[REDACTED]
CAIR #	24234572
DATE OF INCIDENT	11/22/13
DATE OF NOTICE	11/22/13
MODEL/MODEL YEAR	2012 Dodge Durango Crew AWD
VIN	1C4RDJDG8CC [REDACTED]
MILEAGE	12,000
OWNER	[REDACTED]
COURT	None
DOCKET #	None
ALLEGED DEFECT	Interior Fire
DESCRIPTION	The owner states that after his wife returned home from driving their son to school and parked their vehicle in the garage she noticed smoke filling the inside of the vehicle. Mrs. West immediately called the fire department.
CRASH	No
PROPERTY DAMAGE	Yes
INJURIES	0
FATALITIES	0
ANALYSIS	An inspection ³ of the vehicle revealed that the origin of the fire was the driver`s side headliner directly above the sun-visor vanity mirror. The cause of the fire appears to be an electrical short.

³ The inspection was conducted at the request of counsel in anticipation of litigation and the report is being withheld under a claim of attorney work-product privilege.

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ENCLOSURE 7

Visor LOP Detail 9 9 13

Headliner related LOPs

LOP	Description	Problem Code
8507201	Lamp, sun visor - Test and replace Left	11 broken or cracked
8507202	Lamp, sun visor - Test and replace Right	11 broken or cracked
0891KCE1	Wiring Visor Vanity/Map/Reading Lamps - Test and repair	1C connector loose or not attached, 1W wire cut by sharp edge, 2C connector broken/fractured, 2T terminals broken or fractured, 2W wires cut by moving mechanism , 3W wires cut by bolt/screw, 4W wires burned/damaged, 5W broken splice in harness, 58 internal defect, 7W harness not clipped or strapped
0891KCE1	Wiring Visor Vanity/Map/Reading Lamps - Test and repair	1C connector loose or not attached, 1W wire cut by sharp edge, 2C connector broken/fractured, 2T terminals broken or fractured, 2W wires cut by moving mechanism , 3W wires cut by bolt/screw, 4W wires burned/damaged, 5W broken splice in harness, 58 internal defect, 7W harness not clipped or strapped
0891KCK1	Wiring Visor Vanity/Map/Reading Lamps - Test and repair	1C connector loose or not attached, 1W wire cut by sharp edge, 2C connector broken/fractured, 2T terminals broken or fractured, 2W wires cut by moving mechanism , 3W wires cut by bolt/screw, 4W wires burned/damaged, 5W broken splice in harness, 58 internal defect, 7W harness not clipped or strapped
0891KCQ1	Wiring Visor Vanity/Map/Reading Lamps - Test and repair	1C connector loose or not attached, 1W wire cut by sharp edge, 2C connector broken/fractured, 2T terminals broken or fractured, 2W wires cut by moving mechanism , 3W wires cut by bolt/screw, 4W wires burned/damaged, 5W broken splice in harness, 58 internal defect, 7W harness not clipped or strapped
0891KCV1	Wiring Visor Vanity/Map/Reading Lamps - Test and repair	1C connector loose or not attached, 1W wire cut by sharp edge, 2C connector broken/fractured, 2T terminals broken or fractured, 2W wires cut by moving mechanism , 3W wires cut by bolt/screw, 4W wires burned/damaged, 5W broken splice in harness, 58 internal defect, 7W harness not clipped or strapped

Headliner related LOPs

0891PMK1	Wiring Overhead Console - Test and repair	1C connector loose or not attached, 1W wire cut by sharp edge, 2C connector broken/fractured, 2T terminals broken or fractured, 2W wires cut by moving mechanism , 3W wires cut by bolt/screw, 4W wires burned/damaged, 5W broken splice in harness, 58 internal defect, 7W harness not clipped or strapped
23204509	Headliner - Replace	X2 split, cut or torn, 1W wires cut by sharp edge, 14 short or open , 2W wires cut by moving mechanism, 3W wires cut by bolt/screw, 4W wires burned/damaged , 5W broken splice in harness, 69 discolored
23207502	Visor, sun - Replace Right	X2 split, cut or torn, , X6 terminal damaged, 11 broken or cracked, 2T terminal broken or cracked, 27 damaged, 48 grounded or shorted, 5T terminal pushed out14 short or open , 69 discolored
23207503	Visor, sun - Replace Left	X2 split, cut or torn, , X6 terminal damaged, 11 broken or cracked, 2T terminal broken or cracked, 27 damaged, 48 grounded or shorted, 5T terminal pushed out14 short or open , 69 discolored
23207402	Cover, sun visor bracket - Replace Right	X2 split, cut or torn, 11 broken or cracked, 27 damaged, 69 discolored
23207403	Cover, sun visor bracket - Replace Left	X2 split, cut or torn, 11 broken or cracked, 27 damaged, 69 discolored
23207702	Retainer, sun visor - Replace Clip/Receptacle/Retainer/Support-One or All	K4 loose, 06 bent, 11 broken or cracked, 51 improperly installed
23306352	Tube, sunroof drain Tube, Sunroof Drain - Replace/Repair	06 bent, 51 improperly installed, SE shortage part, 26 cut short, 27 damaged, 4X water leak, 51 improperly installed
23305702	Frame, sunroof - Replace Dual Pane Sunroof	11 Broken or cracked, 51 improperly installed, SE shortage part, 27 damaged, 51 improperly installed
23306503	Glass, sunroof - Replace Glass Rear - Dual Pane Sunroof	All fail codes