



August 25, 2014

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

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

Reference: NVS-213swmc; PE14-019

Dear Mr. Quandt:

Attached is Chrysler Group LLC's partial response to the referenced inquiry. Pursuant to an agreement with ODI on August 20, 2014, Chrysler is responding to questions 1, 8, 10, 13 and providing partial responses to questions 3, 4, 5, 9, 11, 14 in this response. The full and remaining responses will be provided on or before October 6, 2014. 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,

Philip Hartnagel

A handwritten signature in blue ink, appearing to read "Philip Hartnagel", with a large flourish at the end.

Attachment and Enclosures

Preliminary Statement

On April 30, 2009 Chrysler LLC, the entity that manufactured and sold the vehicles that are the subject of this Information Request, filed a voluntary petition for relief under Chapter 11 of Title 11 of the United States Bankruptcy Code.

On June 10, 2009, Chrysler LLC sold substantially all of its assets to a newly formed company now known as Chrysler Group LLC. Pursuant to the sales transaction, Chrysler Group LLC assumed responsibility for safety recalls pursuant to the 49 U.S.C. Chapter 301 for vehicles that were manufactured and sold by Chrysler LLC prior to the June 10, 2009 asset sale.

On June 11, 2009, Chrysler LLC changed its name to Old Carco LLC. The assets of Old Carco LLC that were not purchased by Chrysler Group LLC, as well as the liabilities of Old Carco that were not assumed, remain under the jurisdiction of the United States Bankruptcy Court – Southern District of New York (*In re Old Carco LLC, et al.*, Case No. 09-50002).

Note: Unless indicated otherwise in the response to a question, this document contains information through July 3, 2014, the date the information request was received.

Pursuant to an agreement with ODI on August 20, 2014, this response contains Chrysler's answers to questions 1, 8, 10 and 13, and partial answers to questions 3, 4, 5, 9, 11 and 14. The full and remaining responses will be provided on or before October 6, 2014.

1. **State, by model and model year, the number of subject and peer vehicles Chrysler has manufactured for sale or lease in the United States or federalized territories. Separately, for each subject vehicle manufactured to date by Chrysler, state the following:**
 - a. **Vehicle identification number (VIN);**
 - b. **Model;**
 - c. **Model Year;**
 - d. **Gear ratio;**
 - e. **Date of manufacture;**
 - f. **Date warranty coverage commenced; and**
 - g. **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." See Enclosure 1, Data Collection Disc, for a pre-formatted table that provides further details regarding this submission.

A1.

The subject vehicle is the 2005 model year ("MY") Dodge Ram 1500 Pick-up ("DR") ("subject vehicles"). In its information request, NHTSA has defined the peer vehicles as any 2002 to 2008 model year vehicle equipped with a 9.25 inch rear axle assembly. Chrysler has identified the following vehicle families that meet the peer vehicle criteria:

- 2002 – 2003 MY Dodge Ram Van ("AB");
- 2002 – 2004 MY Dodge Dakota ("AN");
- 2002 – 2003 MY Dodge Durango ("DN");
- 2002 – 2008 MY Dodge Ram 1500 Pick-up ("DR");
- 2004 – 2008 MY Dodge Durango ("HB");
- 2005 – 2008 MY Dodge Dakota ("ND");
- 2006 – 2008 MY MMC Raider ("NM"); and
- 2007 – 2008 MY Chrysler Aspen ("HG").

PE14-019 Vehicle Volume for Model Year 2002 to 2005

2002 MY (Peer)		2003 MY (Peer)		2004 MY (Peer)		2005 MY (Subject)	
Vehicle Family	Volume	Vehicle Family	Volume	Vehicle Family	Volume	Vehicle Family	Volume
AB	27,229	AB	16,481	AN	55,102	DR	257,227
AN	66,927	AN	48,765	DR	313,751	HB	33,380
DN	96,104	DN	101,226	HB	35,761	ND	58,886
DR	287,846	DR	286,015				

PE14-019 Vehicle Volume for 2006 to 2008

2006 MY (Peer)		2007 MY (Peer)		2008 MY (Peer)	
Vehicle Family	Volume	Vehicle Family	Volume	Vehicle Family	Volume
DR	178,067	DR	184,065	DR	186,473
HB	25,146	HB	10,854	HB	5,487
ND	36,402	HG	13,244	HG	10,542
NM	3,203	ND	15,401	ND	11,828
		NM	317	NM	1

Detailed production data is provided in Enclosure 1 Production Data as Microsoft Access tables with the subject vehicles titled "PRODUCTION DATA PE14-019 - Subject.accdb" and the peer vehicles titled "PRODUCTION DATA PE14-019 - Peer.accdb".

3. **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 and peer 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 (as may occur due to fuel system damage from a loose driveshaft);**
 - 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.

A3.

Chrysler has identified the number of each of the following a. through g. that relate to, or may relate to, the alleged defect in the subject vehicles. (The peer vehicle data will be provided on or before October 6, 2014.) Chrysler has conducted a reasonable and diligent search of the normal repositories of such information.

- a. Chrysler has identified 115 consumer complaints (Customer Assistance Inquiry Requests or “CAIR”) for the subject vehicles, representing 112 unique VINs for the subject vehicle.
- b. Chrysler has identified two field reports for the subject vehicles.
- c. Chrysler has identified two consumer complaints and two legal claims alleging a crash in the subject vehicle. Chrysler identified zero consumer complaints and one legal claim alleging injury in the subject vehicles. Chrysler identified zero fatalities in the subject vehicles. There are three unique VINs relating to crash and one unique VIN relating to injury.
- d. Chrysler has identified zero reports involving a fire for the subject vehicles.
- e. Chrysler identified six consumer complaints and two legal claims alleging property damage in the subject vehicles, representing six unique VINs.
- f. Chrysler identified zero third-party arbitration proceedings involving Chrysler for the subject vehicles.
- g. Chrysler identified six lawsuits or legal claims involving the subject vehicles.

In summary, there are 113 unique VINs involving the subject vehicles that relate to, or may relate to, the alleged defect.

Summary descriptions of the alleged defect, causal and contributing factors, and Chrysler’s assessment of the problem, to the extent available, are included in Enclosure 4 Complaint Data in a Microsoft Access table, titled “COMPLAINT DATA (Subject).accdb”.

4. **Separately, for each item (complaint, report, claim, notice, or matter) within the scope of your response to Request No. 3, state the following information:**
 - a. **Chrysler’s file number or other identifier used;**

- b. **The category of the item, as identified in Request No. 3 (i.e., consumer complaint, field report, etc.);**
- c. **Vehicle owner or fleet name (and fleet contact person), address, and telephone number;**
- d. **Vehicle identification number (VIN);**
- e. **Model;**
- f. **Model year;**
- g. **Vehicle's mileage at time of incident;**
- h. **Incident date;**
- i. **Report or claim date;**
- j. **Whether a crash is alleged;**
- k. **Whether a fire is alleged;**
- l. **Whether property damage is alleged;**
- m. **Number of alleged injuries, if any; and**
- n. **Number of alleged fatalities, if any.**

Provide this information in Microsoft Access 2010, or a compatible format, entitled "COMPLAINT DATA." See Enclosure 1, Data Collection Disc, for a pre-formatted table that provides further details regarding this submission.

A4.

The detailed response for the subject vehicles that lists the customer complaints, field reports and legal claims from Request No. 3, as requested in Items a. through n., is provided in Enclosure 4 Complaint Data in a Microsoft Access table, titled "COMPLAINT DATA (Subject).accdb".

- 5. Produce copies of all documents related to each item within the scope of Request No. 3. Organize the documents separately by category (i.e., consumer complaints, field reports, etc.) and describe the method Chrysler used for organizing the documents. Describe in detail the search methods and search criteria used by Chrysler to identify the items in response to Request No. 3.**

A5. Copies of all documents within the scope of Question No. 3 for the subject vehicles are provided in Enclosure 5 Request No. 3 Backup Data. The documents for the subject vehicles contain CAIR reports, field reports and legal claims. The CAIR summaries are submitted in one .pdf file and the related documents are arranged in folders by CAIR number.

- 8. Produce copies of all service, warranty, and other documents that relate to, or may relate to, the alleged defect in the subject vehicles, that Chrysler has issued to any dealers, regional or zone offices, field offices, fleet purchasers, or other entities. This includes, but is not limited to, bulletins, advisories, informational documents, training documents, or other**

documents or communications, with the exception of standard shop manuals. Also include the latest draft copy of any communication that Chrysler is planning to issue within the next 120 days.

A8. Chrysler has not identified any GPOP tech tips, Technical Service Bulletins or other informational documents that relate to, or may relate to, the alleged defect for the subject vehicles that have been issued to Chrysler dealers, Business Centers, fleet purchasers or other such entities. There are also no such communications or informational documents currently planned for the next 120 days.

9. Describe all assessments, analyses, tests, test results, studies, surveys, simulations, investigations, inquiries and/or evaluations (collectively, “actions”) that relate to, or may relate to, the alleged defect in the subject and peer vehicles that have been conducted, are being conducted, are planned, or are being planned by, or for, Chrysler. Include any studies or comparisons done comparing nut torque measurement and field data comparisons comparing the subject and peer vehicles to those vehicles involved in recalls 13V-038, 12V-474 and 10V-656. For each such action, provide the following information:

- a. **Action title or identifier;**
- b. **The actual or planned start date;**
- c. **The actual or expected end date;**
- d. **Brief summary of the subject and objective of the action;**
- e. **Engineering group(s)/supplier(s) responsible for designing and for conducting the action; and**
- f. **A brief summary of the findings and/or conclusions resulting from the action.**

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.

A9.

Chrysler is working on the following studies and will provide the finding or status in the October 6, 2014 response.

Assessment 1: Returned Parts – Exhibiting Condition

Start Date	End Date	Engineering Group Responsible
07/03/2014	TBD	Axle Engineering

Objective: Measure and analyze dimensional information of returned parts (pinion nut and pinion) that may have exhibited a condition relating to the alleged defect. Also, if possible, determine whether the part is original or service.

Results: Dimensional information for two pinions returned to Chrysler indicates they may have been undersized. Objective measurements are planned, but not yet complete. Chrysler is unable to determine at this time whether the two return parts are original or service parts.

Assessment 2: Returned Parts – All

Start Date	End Date	Engineering Group Responsible
08/18/2014	TBD	Axle Engineering

Objective: Measure and analyze dimensional information of returned parts (pinion nut and pinion) that a dealer services under warranty or goodwill.

Results: The survey is not yet completed.

Assessment 3: Field Study

Start Date	End Date	Engineering Group Responsible
7/14/2014	TBD	Axle Engineering

Objective: Inspect a sampling of 2002 to 2008 subject and peer vehicles built with 9.25" axles, to determine if the current residual pinion nut torque meets the minimum requirement. If a pinion nut is found to have a residual torque value below the minimum requirement, the pinion and pinion will be removed for further root cause analysis.

Results: The survey is not yet completed.

Assessment 4: Salvage Yard Test

Start Date	End Date	Engineering Group Responsible
8/11/2014	TBD	Axle Engineering

Objective: Measure and analyze dimensional information of parts obtained from salvage yards (pinion nut, pinion and differential when available). When the full assembly is available the current residual torque of the pinion nut will be measured.

Results: The survey is not yet completed.

- 10. Describe all modifications or changes made by, or on behalf of, Chrysler in the design, material composition, manufacture, quality control, supply, or installation of the subject component, from the start of production to date, which relate to, or may relate to, the alleged defect in the subject and peer vehicles. For each such modification or change, provide the following information:**
- a. The date or approximate date on which the modification or change was incorporated into vehicle production;**
 - b. A detailed description of the modification or change;**

- c. **The reason(s) for the modification or change;**
- d. **The part number(s) (service and engineering) of the original component;**
- e. **The part number(s) (service and engineering) of the modified component;**
- f. **Whether the original unmodified component was withdrawn from production and/or sale, and if so, when;**
- g. **When the modified component was made available as a service component; and**
- h. **Whether the modified component can be interchanged with earlier production components.**

Also, provide the above information for any modification or change that Chrysler is aware of which may be incorporated into vehicle production within the next 120 days.

A10.

The change history for the subject components for the subject and peer vehicles is provided in Enclosure 10 Change History CONF BUS INFO, which has been submitted under separate cover to the NHTSA Chief Counsel's Office with a request for confidential treatment. Chrysler is not aware of any modification or changes that may be incorporated into the subject vehicle components within the next 120 days.

11. Produce two of each of the following:

- a. **Exemplar samples of each design version of the subject component;**
- b. **Field return samples of the subject component exhibiting the subject failure mode; and**
- c. **Any kits that have been released, or developed, by Chrysler for use in service repairs to the subject component/assembly which relate, or may relate, to the alleged defect in the subject vehicles.**

A11.

As agreed during an August 20, 2014, telephone call with ODI, only service parts for the pinion, pinion nut and crush sleeve from kits at two different levels are being provided. The kit part numbers these are from are 05010321AF and 05010321AG.

- a. To date, Chrysler has obtained only two field return parts from vehicles that may have exhibited a condition relating to the alleged defect. One of these parts came from a vehicle that ODI identified in a June 27, 2014 e-mail involving VOQ #10606125. Because an engineering analysis is still ongoing with these parts, they are not being provided with this submission.
- b. The results of this analysis will be provided to ODI on or before October 6, 2014. As noted A9, Assessment 1, other field parts from vehicles

exhibiting a condition relating to the alleged defect are being located and will be provided to ODI following Chrysler's analysis, which Chrysler anticipates will be concluded on or before October 6, 2014.

- c. There are no kits released for the subject components in the subject and peer vehicles.

13. Provide the following information related to the subject recalls:

- a. **Describe all actions taken by Chrysler to investigate the defect conditions; and**
- b. **Provide copies of all test reports, investigation reports, summaries and presentations related to the recalls and the associated internal investigations.**

A13.

- a. Chrysler initiated an internal investigation in August 2009 and the details of the investigation were produced in the final response to PE12-021 dated October 5, 2012. The preliminary portion of PE12-021 led to recall M34 (12V-474), for which the 573 Defect Report was submitted October 2, 2012. The materials submitted throughout the duration of PE12-021 were provided on September 21, 2012, September 27, 2012, October 5, 2012, December 14, 2012, January 10, 2013 and March 4, 2013. The final results of PE12-021 led to recall N08 (13V-038), for which Chrysler submitted the 573 Defect Report on February 5, 2013.
- b. Chrysler is providing a summary document of the pinion nut investigation history PE14-019, including a preliminary look at warranty data for the subject and peer vehicles. This summary is provided in Enclosure 13 Related to Subject Recalls CONF BUS INFO, which has been submitted under separate cover to the NHTSA Chief Counsel's Office with a request for confidential treatment.

Chrysler provided copies of the available materials in relation to the subject recalls and PE12-021 to NHTSA on September 21, 2012, September 27, 2012, October 5, 2012, December 14, 2012, January 10, 2013, and March 4, 2013. The 573 Defect Report for recall M34 (12V-474) was provided on October 2, 2012 and the 573 Defect Report for N08 (13V-038) was provided on February 5, 2013.

14. Provide the following information for the subject vehicles:

- a. **Provide computer model design views of the driveshaft and rear axle assemblies from front, side and bottom perspectives;**
- b. **Provide an exploded part diagram of the rear axle assembly;**
- c. **Describe and provide copies of all engineering standards and design requirements related to pinion nut torque and torque retention;**
- d. **Describe the service procedure for removal and reinstallation of the pinion nut and provide copies of all related service procedures,**

- including guidelines for reuse of the original pinion nut or requirements for using a new part;**
- e. Provide computer aided design drawings from the bottom perspective for each body style and/or wheel base, showing the location of any other components that may be contacted by a loose driveshaft (e.g., fuel tank, EVAP canister, exhaust system);**
 - f. Describe the procedure for installation of the subject component and all quality control methods for verifying and documenting proper pinion nut torque used for the subject and peer vehicles; and**
 - g. Provide tables showing:**
 - i) The production volumes, non-duplicative complaint and field report counts and resulting failure rates by model and model year for all MY 2002 through current Chrysler vehicles equipped with the subject axle assembly; and**
 - ii) The production volumes, warranty claim counts related to loose pinion nuts and resulting claim rates by model and model year for all MY 2002 through current Chrysler vehicles equipped with the subject axle assembly.**

A14.

- a. The computer model design views for the subject vehicles have been included in Enclosure 14 Engineering Documents Public.
- b. The exploded part diagram of a rear axle is provided in Enclosure 14 Engineering Documents CONF BUS INFO, which has been submitted under separate cover to the NHTSA Chief Counsel's Office with a request for confidential treatment.
- c. The engineering standards and design requirements are in Enclosure 14 Engineering Documents CONF BUS INFO, which has been submitted under separate cover to the NHTSA Chief Counsel's Office with a request for confidential treatment.
- d. The service procedure for the removal and installation of the pinion nut are in Enclosure 14 Engineering Documents Public.
- e. The computer aided design drawings for the subject vehicles have been included in Enclosure 14 Engineering Documents Public.
- f. Per agreement with ODI, the response to these subparts will be provided on or before October 6, 2014.
- g. Per agreement with ODI, the response to these subparts will be provided on or before October 6, 2014.