



INFORMATION Redacted PURSUANT TO
THE FREEDOM OF
INFORMATION ACT (FOIA), 5 U.S.C. 552(B)
(6)

August 7, 2014

Mr. D. Scott Yon, Chief
Vehicle Integrity Division, NVS-214
U.S. Department of Transportation

National Highway Traffic Safety Administration (NHTSA)
Office of Defects Investigation (ODI)
Room W48-304
1200 New Jersey Avenue SE
Washington, D.C. 20590

Reference: NVS-212ef; RQ14-001

Dear Mr. Yon:

Attached is Chrysler Group LLC's ("Chrysler") response for questions 1 – 3 of the referenced inquiry. By providing the information contained herein, Chrysler is not waiving its claim to attorney work product and attorney-client privileged communications.

Sincerely,

A handwritten signature in blue ink, appearing to read "PHILIP S. HARTNAGEL", with a long horizontal flourish extending to the right.

Philip S. Hartnagel

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 June 19, 2014, the date the information request was received.

- 1. 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.

- A1. The following table summarizes the reports identified 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 the normal repositories of such information.**

- No Field Reports, Fire, Crash, Property Damage, or Fatality claims relate to, or may relate to, the alleged defect in the subject vehicles.**
- No 3rd party arbitration relates to, or may relate to, the alleged defect in the subject vehicles.**
- 4 injuries, involving 3 unique VINs relate to, or may relate to, the alleged defect in the subject vehicles.**
- 1 2003 KJ Uncodeable Claim Narrative (“UCN”) relates to, or may relate to, the alleged defect in the subject vehicles.**

MY/MODEL/BODY	CAIR	UCN	LEGAL	TOTAL	VINS UNIQUE
2002-2003 Jeep Liberty (KJ)	9	1	2	12	8
2002-2004 Jeep Grand Cherokee (WJ)	5	0	1	6	4

- 2. Separately, for each item (complaint, report, claim, notice, or matter) within the scope of your response to Request No. 1, state the following information:**
 - a. Chrysler's file number or other identifier used;**
 - b. The category of the item, as identified in Request No. 1 (i.e., consumer complaint, field report, etc.);**
 - c. Vehicle owner or fleet name (and fleet contact person), address, and telephone number;**
 - d. Vehicle's serial number;**
 - e. Incident date;**
 - f. Report or claim date;**
 - g. Whether a crash is alleged;**
 - h. Whether the air bag warning light was illuminated prior to the IABD event;**
 - i. Whether property damage is alleged;**
 - j. Number of alleged injuries, if any; and**
 - k. Number of alleged fatalities, if any.**

Provide this information in Microsoft Access 2010, or a compatible format, entitled "REQUEST NUMBER ONE DATA."
- A2. The detailed response identifying the customer complaints, field reports, legal claims, and lawsuits from Request No. 2, as requested in Items a. through k. is provided in Enclosure 1 – Request Number One Data, in a Microsoft Access 2000 table titled "Request Number One Data". Chrysler notes that Enclosure 1 information contained in response to subpart h (air bag warning light) identifies those incidents where the driver clearly indicated an air bag warning light and/or chime activated prior to deployment. A null value in subpart h does not mean the air bag warning light and/or chime did not activate prior to deployment.
- 3. Produce copies of all documents related to each item within the scope of Request No. 1. Organize the documents separately by category (i.e., consumer complaints, field reports, etc.) and describe the method Chrysler used for organizing the documents.**
- A3. Copies of all documents within the scope of Request Number 1 are provided in Enclosure 2 – Field Data. The documents are organized by report type: CAIR, Field Report, or Legal Claim. For the customer complaints, the CAIR summaries are submitted in one .pdf file and the related documents are arranged in folders by CAIR number. The non-privileged Vehicle Inspection Field Reports are also included in the related documents associated with the CAIR Reports. The Legal Claims are arranged in folders by claimant name. A copy of the 1 UCN noted in A1 is included in Enclosure 2.