



August 11, 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-212pco; RQ14-002

Dear Mr. Yon:

Attached is Chrysler Group LLC's ("Chrysler") amended response for questions 2 – 7 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: Consistent with a July 11, 2014 agreement with the National Highway Traffic Safety Administration (“NHTSA”) Office of Defect Investigations (“ODI”), on July 14, 2014 Chrysler Group LLC submitted a partial response to the Information Request (“IR”) in this matter (NVS-212pco/RQ14-002). This submission contains Chrysler Group LLC’s amended responses to IR Questions 2 – 7.

1. **State, by model and model year, the number of the subject vehicles that 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. **Date the 11 V-139 recall remedy was completed; 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. The total number of vehicle involved in 11V-139 was 197,692 2010MY Dodge Journey's, Dodge Grand Caravan, and Chrysler Town & Country's. The breakdown is 31,709 2010MY Dodge Journeys, 81,371 2010 Dodge Caravan's, and 84,612 2010 MY Chrysler Town and Country vehicles. The detailed response that list all 2010 Dodge Journey, Dodge Grand Caravan, and Chrysler Town & Country vehicles involved in 11V-139 is provided in the Microsoft Access 2010 Database titled "RQ14-002 PRODUCTION DATA.accdb", which is provided in Enclosure 1 PRODUCTION DATA. The data provided may include a small number of VINs for vehicles that were not sold in the USA or its territories. An updated Enclosure 1 PRODUCTION DATA will be provided if necessary.

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 defect in a subject vehicle which occurred after the date on which the vehicle was originally remedied under 11V-139 (including replacement of the remedied part with a new part):**
 - a. **Consumer complaints, including those from fleet operators;**
 - b. **Field reports, including dealer field reports;**
 - c. **Reports involving a crash, injury, or fatality;**
 - d. **Property damage claims;**
 - e. **Third-party arbitration proceedings where Chrysler is or was a party to the arbitration; and**
 - f. **Lawsuits, both pending and closed, in which Chrysler is or was a defendant or codefendant.**

For subparts "a" through "f," state the total number of each item (e.g., consumer complaints, field reports, etc.) separately. Multiple incidents involving the same vehicle are to be counted separately. Multiple reports of the same incident are also to be counted separately (i.e., a consumer complaint and a field report

involving the same incident in which a crash occurred are to be counted as a crash report, a field report and a consumer complaint). In addition, for items "c" through "f," provide a summary description of the alleged problem and causal and contributing factors and Chrysler's assessment of the problem, with a summary of the significant underlying facts and evidence. For items "e" and "f," identify the parties to the action, as well as the caption, court, docket number, and date on which the complaint or other document initiating the action was filed.

A2. Chryslers preliminary assessment of the 21 VOQ's provided by NHTSA assumes all of the vehicles had the recall work performed. Chrysler was able to validate the recall work was performed on all but six for which the VINs were not provided. None of VOQs complained of the key moving to an "accessory" position, and six commented about stalling. The main complaint is the electrical features not working properly after the recall work. Three comment needing to move the key to get all the electrical features to work, but not to restart the vehicle. For those customers that complained about a stalling condition, the cause of the stalling condition is unknown. With no indication the key rotated to an "accessory" or "off" position, the airbags remained functional. The chart shown below can also be found in Enclosure 2 VOQ Assessment PUBLIC.

Provided	Vehicle MY	Vehicle Type	NHTSA Reference #	Date Received	Complaint Pre/Post to Recall Update	Comment
Post R	2010	Chrysler Town & Country	10564340	14-Feb-14	Post - 5/25/2012	Stalled while driving and electrical issues - does not state key moved
Post R	2010	Chrysler Town & Country	10537992	29-Aug-13	Unknown - No VIN Provided	Per complaint recall had been done - electrical issue vehicle never turned off
Post R	2010	Chrysler Town & Country	10536415	20-Aug-13	Post - 4/7/2012	Stalled while driving - does not state key moved
Post R	2010	Dodge Journey	10496599	6-Feb-13	Post - 7/25/2011	Electrical issue - vehicle never turned off
Post R	2010	Dodge Grand Caravan	10490319	28-Dec-02	Post - 8/23/2011	Electrical issue - vehicle never turned off
Post R	2010	Dodge Grand Caravan	10488096	12-Dec-12	Post - 8/30/2011	Stalled while driving - does not state key moved
Post R	2010	Chrysler Town & Country	10477251	27-Sep-12	Unknown - No Vin Provided	Stalled while driving - does not state key moved
Post R	2010	Dodge Caravan	10474413	9-Sep-12	Unknown - No Vin Provided	Electrical issue - vehicle never turned off
Post R	2010	Dodge Grand Caravan	10465717	15-Jul-12	Post - 9/23/2011	Key will not come out - 2 WIN modules
Post R	2010	Chrysler Town & Country	10461850	15-Jun-12	Post - 1/31/2012	Stalled while driving - does not state key moved
Post R	2010	Dodge Grand Caravan	10459082	21-May-12	Post 4/14/2012	Broke 6 key FOBs within 3 months after recall work
Post R	2010	Chrysler Town & Country	10456805	29-Apr-12	Pre - 10/11/2011	Incident date for accident is Pre Recall - Post recall is electrical issues not a stall
Post R	2010	Chrysler Town & Country	10455484	17-Apr-12	Post - 8/3/2011	Electrical issue vehicle never turned off - toggled ignition switch to fix
Post R	2010	Dodge Grand Caravan	10449406	27-Feb-12	Unknown - No Vin Provided	Comment is after recall there were electrical issues - vehicle never turned off
Post R	2010	Dodge Caravan	10448173	16-Feb-12	Post - 12/3/2011	Electrical issue - vehicle never turned off
Post R	2010	Chrysler Town & Country	10446694	4-Feb-12	Pre and Post - 9/23/2011	Incident date was 3/11/2011 - stalled after new ignition switch in 2012
Post R	2010	Dodge Grand Caravan	10445176	25-Jan-12	Post - 1/12/2012	Electrical issue - vehicle never turned off
Post R	2010	Chrysler Town & Country	10443192	9-Jan-12	Unknown - No Vin Provided	Comment is after recall key FOB would not lock/unlocks the doors
Post R	2010	Chrysler Town & Country	10427901	29-Sep-11	Post - 8/30/2011	Electrical issue vehicle never turned off - jiggle ignition switch to fix
Post R	2010	Dodge Grand Caravan	10425762	16-Sep-11	Post - 8/4/2011	Stalled while driving - does not state key moved
Post R	2010	Chrysler Town & Country	10419669	16-Aug-11	Unknown - No Vin Provided	Comment is after recalls stays stuck in ON and so electrical features do not work

Chrysler's preliminary review of its internal customer complaint data is reflected in the data charts contained in Enclosure 3 Customer Complaint Assessment PUBLIC. Chrysler will continue to review the other data sources sought by NHTSA and will provide an updated Enclosure if necessary.

A2. Amended Response

The following summarizes the non-privileged 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.

- a. Chrysler completed a more detailed review of the 21 VOQs provided by NHTSA to include corresponding vehicle repair history. Chrysler assumes that all 21 vehicles in question were remedied under the L25/11V-139 campaign (Note: six VOQs do not have VINs, but the vehicle owner stated L25/11V-139 was

complete in all cases). Chrysler identified one VOQ in which the customer stated there was inadvertent Frequency Operated Button Ignition Key (“FOBIK”) movement after recall L25/11V-139 had been completed on the vehicle (“Post Remedy”), resulting in stall. Two additional VOQs contain customer narratives implying possible FOBIK movement resulting in stall, without specifically stating FOBIK movement occurred. Please see Table 1.

Vehicle MY	Vehicle Type	NHTSA Reference #	Date Received	VOQ Incident	Recall Performed	Complaint Pre/Post to Recall Update	Comment
2010	Chrysler Town & Country	10537992	29-Aug-13	25-Aug-13	Cust. states comp.	Unknown - No VIN Provided	Stalled while driving - Customer states that post recall, the ignition key moved from Run - Acc without being touched
2010	Chrysler Town & Country	10446694	4-Feb-12	11-Mar-11	23-Sep-11	Post	Vehicle stalls post recall - Does not state key moved
2010	Chrysler Town & Country	10477251	27-Sep-12	15-Jul-12	Cust. states comp.	Unknown - No Vin Provided	Stalled while driving - Does not state key moved

Table 1: VOQs

Chrysler identified 66 consumer complaints (Customer Assistance Inquiry Request or CAIR and Customer Promoter Score or CPS) that relate to, or may relate to, the alleged defect in a subject vehicle Post Remedy, which represent 60 unique VINs.

- b. Chrysler identified eight field reports that relate to, or may relate to, the alleged defect in a subject vehicle Post Remedy, which represent eight unique VINs.
 - c. Chrysler identified one report alleging a crash, zero reports of injury, and zero reports of fatality that relate to, or may relate to, the alleged defect in a subject vehicle Post Remedy.
 - d. Chrysler identified one report alleging property damage that relates to, or may relate to, the alleged defect in a subject vehicle Post Remedy.
 - e. Chrysler identified zero third-party arbitration proceedings involving Chrysler that relate to, or may relate to, the alleged defect in a subject vehicle Post Remedy.
 - f. Chrysler identified four legal claims that relate to, or may relate to, the alleged defect in a subject vehicle Post Remedy that involve four unique VINs.
- 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;

Mr. Scott Yon
Reference: NVS-212pco; RQ14-002
August 11, 2014

ATTACHMENT

Page 5 of 8

- i. **Whether a crash is alleged;**
- j. **Whether property damage is alleged;**
- k. **Number of alleged injuries, if any;**
- l. **Number of alleged fatalities, if any; and,**
- m. **Summary of Chrysler's findings concerning the alleged ignition key movement/rotation.**

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

A3. Will be part of the August 11, 2014 submission.

A3. Amended Response

The detailed response that lists the customer complaints, field reports, and legal claims and lawsuits from Request No. 2, as requested in items a. through m. is provided in ENCLOSURE 3 Request Number Two Data and titled "REQUEST NUMBER TWO DATA".

- 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. Will be part of the August 11, 2014 submission

A4. Amended Response

Copies of all documents within the scope of Request Number 2 are provided in ENCLOSURE 4 CAIRS Field Report Legal. The documents are organized by report type within individual folders for each: Customer Complaints, Field Reports, and Legal Claims. 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, if any, are also included in the related documents associated with the CAIR Reports. The Legal Claims are arranged in folders by claimant name.

- 5. Describe in detail all actions Chrysler took to validate and assess the immediate effectiveness and long term durability of the remedy (prior to or since) in the subject vehicles. Produce copies of all documents that support your response.**

A5. Will be part of the August 11, 2014 submission

A5. Amended Response

Prior to the launch of the Wireless Ignition Node ("WIN") module detent ring as the remedy in L25/11V-139, Chrysler and the WIN module detent ring supplier performed a

Mr. Scott Yon
Reference: NVS-212pco; RQ14-002
August 11, 2014

ATTACHMENT

Page 6 of 8

number of validation actions. These actions included examining the proficiency of the detent ring to prevent inadvertent FOBIK movement from the "ON" ignition position to either the "ACCESSORY" or the "OFF" ignition position. This testing was successfully completed at both the component and vehicle level.

For Chrysler's component level testing, samples of the WIN module detent ring were taken through a Design Verification Plan and Report test protocol. This test protocol included Thermal Humidity Cycling, Chemical Exposure, Vibration/Mechanical Shock, and Mechanical Endurance testing. All samples tested met the requirements outlined in the WIN module detent ring acceptance criteria.

The WIN module detent ring supplier completed a thorough component level Design Failure Mode and Effects Analysis ("DFMEA"). This analysis examined the effect of potential failures relating to part function, user interface, and assembly process and solutions to the identified potential failure modes. To facilitate an understanding of functionality and future field performance, this DFMEA data supported the WIN module detent ring design decisions.

In addition, Chrysler tested seven WIN module samples, which were previously observed to consistently exhibit the "inadvertent FOBIK movement" condition. When added, the WIN module detent ring was found to prevent inadvertent counterclockwise rotation through and past the "ON" ignition position in all seven WIN module test samples.

Chrysler's vehicle level testing included WIN module detent rings installed on one RT minivan & Country and one Journey. Each vehicle was driven approximately 2,000 miles, which included an additional 120 rapid ignition cycles over and above normal ignition cycles during testing. Zero inadvertent FOBIK movements to the "ACCESSORY" or "OFF" position were reported.

Validation documentation is provided in ENCLOSURE 5 Validation Testing CONF BUS INFO, which has been submitted under separate cover to the NHTSA Chief Counsel's Office with a request for confidential treatment.

6. Does Chrysler have any data that indicates or may indicate that the remedy or remedies is not or may not be effective in any subject vehicle? If your answer is anything but an unqualified no, describe in detail the data and produce copies of all documents that support your response.

A6. As of July 14, 2014, Chrysler does not have any data that indicates or may indicate that the remedy or remedies is not or may not be effective in any subject vehicle. Chrysler will continue to investigate the available data and will report an update, if applicable in the August 11, 2014 response.

A6. Amended Response

Mr. Scott Yon
Reference: NVS-212pco; RQ14-002
August 11, 2014

ATTACHMENT

Page 7 of 8

Chrysler has completed a further review of the effectiveness of the WIN module detent ring since its July 14, 2014 partial response. The validation testing results strongly suggests the WIN module detent ring prevents inadvertent FOBIK movement from the "ON" ignition position to the "ACCESSORY" or "OFF" ignition positions (see A5). However, Chrysler has identified 74 total Post Remedy complaints (customer complaints, field reports, and legal claims) alleging inadvertent FOBIK movement to the "ACCESSORY" or "OFF" ignition positions resulting in vehicle stall (see A2 – A4).

Data collected and analyzed for RQ14-002 shows the WIN module detent ring may inhibit the intended movement of the FOBIK between the "START" and "ON" ignition positions. This inhibited movement may result in the loss of certain electrical features for varying lengths of time during the current key cycle. During this period, the vehicle maintains engine power as well as power and functionality for certain features, such as hazard indicators, seat belt pretensioners and airbags.

7. State whether the anticipated remedy for Chrysler's recall of the MY 2009 Dodge Journey and MY 2008-2009 Grand Caravan and Chrysler Town & Country vehicles for this defect is the same as the remedy for the subject vehicles in recall 11V-139. If your answer to this question is anything but an unqualified yes, describe in detail any anticipated or potential difference between the remedy or remedies for the subject vehicles and the remedy or remedies for the MY 2009 Dodge Journey and MY 2008-2009 Grand Caravan and Chrysler Town & Country vehicles, including an explanation of the reasons for each difference.

A7. The anticipated remedy for Chrysler's recall of the MY 2009 Dodge Journey and MY 2008-2009 Grand Caravan and Chrysler Town & Country vehicles for this defect is the same as the remedy for the subject vehicles in recall 11V-139.

A7. Amended Response

Chrysler is now in the process of evaluating alternative remedies for the 2008 and 2009 MYs, which may or may not include the WIN module detent ring. Chrysler has reason to believe that the WIN module detent ring may inhibit the intended movement of the FOBIK between the "START" and "ON" ignition positions. This inhibited movement may result in the loss of certain electrical features for varying lengths of time during the current key cycle. During this period, the vehicle maintains engine power as well as power and functionality for certain features, such as hazard indicators, seat belt pretensioners and airbags.

Despite nearly 175,000 Post Remedy subject vehicles on the road for a period of time ranging from one to three years, Chrysler has one report of a crash, one report of property damage, and no injuries that relate to, or may relate to, the alleged defect in the subject vehicles Post Remedy, representing one unique VIN. Chrysler continues to investigate the inhibited movement of the FOBIK and its effect on the use of the WIN module detent ring as the corrective action for the remaining population of non-

Mr. Scott Yon
Reference: NVS-212pco; RQ14-002
August 11, 2014

ATTACHMENT

Page 8 of 8

remedied L25/11V-139 vehicles. Chrysler will continue to assess this issue to determine what future actions, if any, are appropriate, and will notify ODI at such time.

RQ14-002

CHRYSLER

8-11-2014

ENCLOSURE 5

MY10 WIN detent PVP&R

03Jun11

8/8/2014

MY10 WIN detent PVP&R 03Jun11.xlsx
return detent torque summary
RQ14-002 8.11.14 – Chrysler – 11







