

May 19, 2015

Mr. Scott Yon, Chief
Office of Defects Investigation, NVS-212
U.S. Department of Transportation

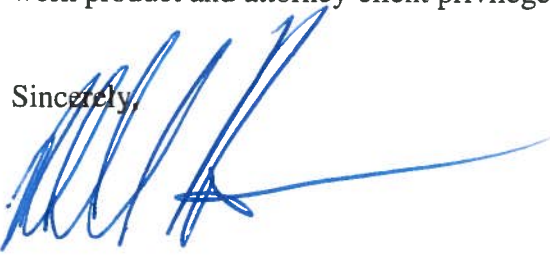
National Highway Traffic Safety Administration (NHTSA)
Office of Defects Investigation (ODI)
Room W48-314
1200 New Jersey Avenue SE
Washington, D.C. 20590

Reference: NVS-212jfa; DP15-003

Dear Mr. Yon:

Attached is the response from FCA US LLC ("FCA US") to the referenced information request. The attached document constitutes a full submission to NVS-212jfa; DP15-003.

By providing the information contained herein, FCA US is not waiving its claim to attorney work product and attorney-client privileged communications.

Sincerely,


Phil Hartnagel

Enclosures

Preliminary Statement

On April 30, 2009 Chrysler LLC, the entity that manufactured and sold the certain vehicles that may be discussed in 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 later 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).

Effective 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 April 27, 2015 the date the information request was received.

1. State within the body of the response to this letter the number of all subject vehicles Chrysler has manufactured, or imported for sale, in the United States. Separately, for each subject vehicle manufactured by Chrysler, state the following:
 - a. Vehicle Identification number (VIN);
 - b. Date of manufacturer (in "yyyy/mm/dd" date format);
 - c. Date warranty coverage commenced (in "yyyy/mm/dd" date format); and
 - d. The State in the United States where the vehicle was originally sold or leased (or delivered for sale or lease).Provide this information in Microsoft Access 2010, or a compatible format, entitled "PRODUCTION DATA."

A1. The subparts (a) through (d) are located in ENCLOSURE 1 and titled DP15 003 PRODUCTION DATA.accdb.

2. State within the body of the response to this letter 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;
 - b. Field reports, including dealer field reports;
 - c. Reports involving a crash, injury, or fatality, based on claims against Chrysler involving a death or injury, or notices received by Chrysler alleging or proving that a death or injury was caused by the alleged defect in a subject vehicle;
 - d. Property damage claims;
 - e. Third-party arbitration proceedings where Chrysler is or was a defendant or codefendant; and
 - f. Lawsuits, both pending and closed, in which Chrysler is or was a defendant or codefendant.

For subparts "a" through "d," state the total number of each item (e.g., consumer complaints, field reports etc.) separately. Multiple incidents involving the same vehicles 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. The following summarizes the number of reports identified by FCA US LLC ("FCA US") that relate to, or may relate to the alleged defects in the subject vehicles. FCA US has conducted a reasonable and diligent search of the normal repositories of such information.

FCA US has identified a total of one report that relates to, or may relate to the alleged defects in the subject vehicles, which represents one unique VIN.

- a. FCA US identified one consumer complaint (Customer Assistance Inquiry Request or CAIR) that relates to, or may relate to the alleged defect in the subject vehicles, which represents one unique VIN.
 - b. FCA US identified zero field reports that relate to, or may relate to the alleged defect in the subject vehicles.
 - c. FCA US identified zero reports involving a crash, injury, or fatality based on claims against FCA US involving a death or injury, or notices received by FCA US alleging or proving that a death or injury was caused by the alleged defect in a subject vehicle.
 - d. FCA US identified zero reports of property damage claims that relate to, or may relate to the alleged defect in the subject vehicles.
 - e. FCA US identified zero reports of third-party arbitration proceedings where FCA US is or was a party to the arbitration that relates to, or may relate to the alleged defect in the subject vehicles.
 - f. FCA US identified zero claims, either pending or closed, in which FCA US is or was a defendant or codefendant that relate to, or may relate to the alleged defect in the subject vehicles.
- 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's name, address, and telephone number;
 - d. Vehicle's VIN
 - e. Vehicle's date of manufacture;
 - f. Vehicle's mileage at the time of the incident;
 - g. Incident date (in "yyyy/mm/dd" date format);
 - h. Report or claim date (in "yyyy/mm/dd" date format);
 - i. Whether a crash is alleged;
 - j. Whether property damage is alleged;
 - k. Number of alleged injuries; and
 - l. Number of alleged fatalities.

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

A3. The subparts (a) through (l) are located in ENCLOSURE 3 and titled DP15 003 REQUEST NUMBER TWO DATA.accdb.

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. Copies of all documents related to each item within the scope of Question 2 can be found in ENCLOSURE 4.

5. **Furnish Chrysler's assessment of the alleged defect in the subject vehicles including:**
- a. **The causal or contributory factor(s);**
 - b. **The failure mechanism(s);**
 - c. **The failure mode(s);**
 - d. **The risk to vehicle's safety that it poses;**
 - e. **What warnings, if any, that the alleged defect was occurring or that the subject component was malfunctioning; and**
 - f. **The VOQ reports included with this inquiry**

A5. In 2010, FCA US initiated an investigation into reports of Chrysler Crossfire back glass separating from the convertible top. In conjunction with an informal inquiry from ODI, FCA US completed an extensive investigation into the general design and field performance of the Crossfire convertible top back glass assembly (including the 2005 MY). At that time, it was the conclusion of both FCA US and ODI that the failure mode identified did not present an unreasonable risk to motor vehicle safety. As a result of the investigation, FCA US determined that a customer satisfaction issue existed and offered a regional extended warranty for the subject vehicles.

In connection with this petition, FCA US further assessed the design of the system. The back glass is dimensionally larger than the opening and is ultrasonically welded on the inside of the convertible top. If the glass becomes separated from the top, significant articulation of the glass within limited space would be necessary for the glass to pass through the smaller opening. Please see Figure 1 for a dimensional comparison of the convertible top opening and glass. Furthermore, the glass is tethered to the top by defroster wires at the three and nine o'clock positions preventing the required articulation (Figures 2 and 3). These design elements make it unlikely that the back glass would leave the vehicle and present a safety hazard.

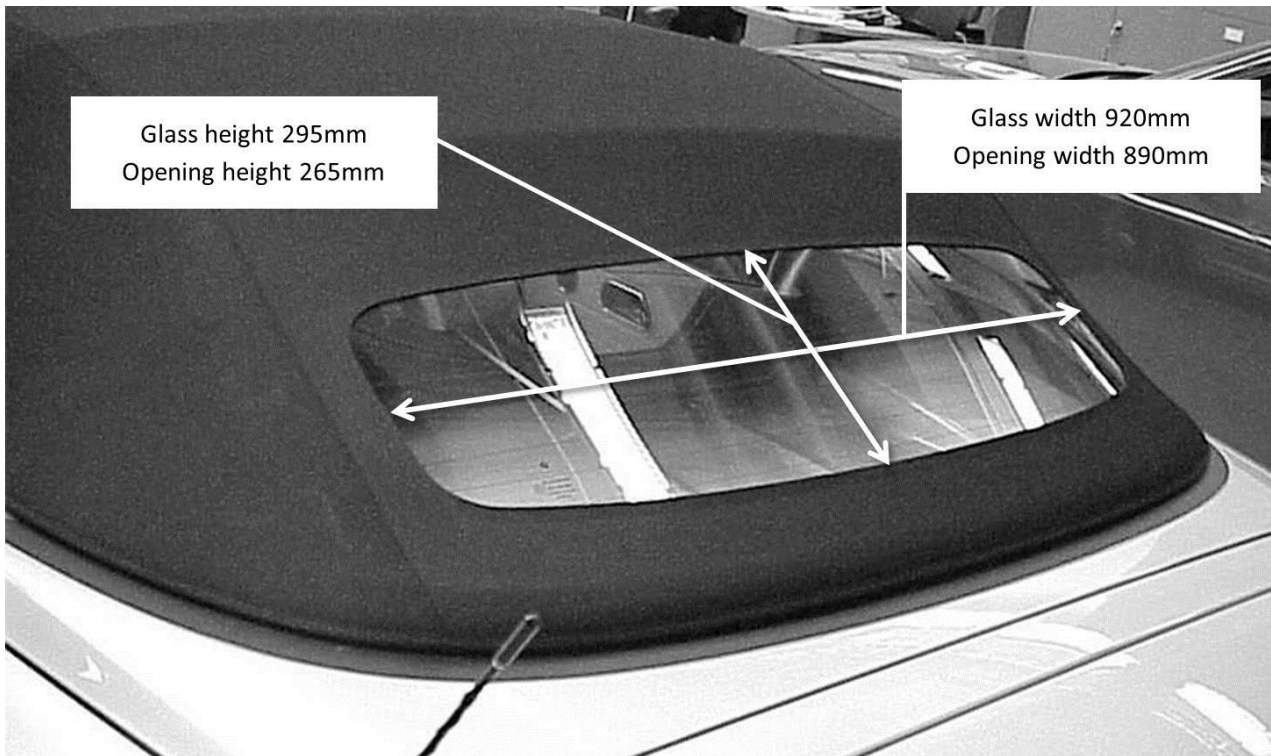


Figure 1: Back Glass Dimensions

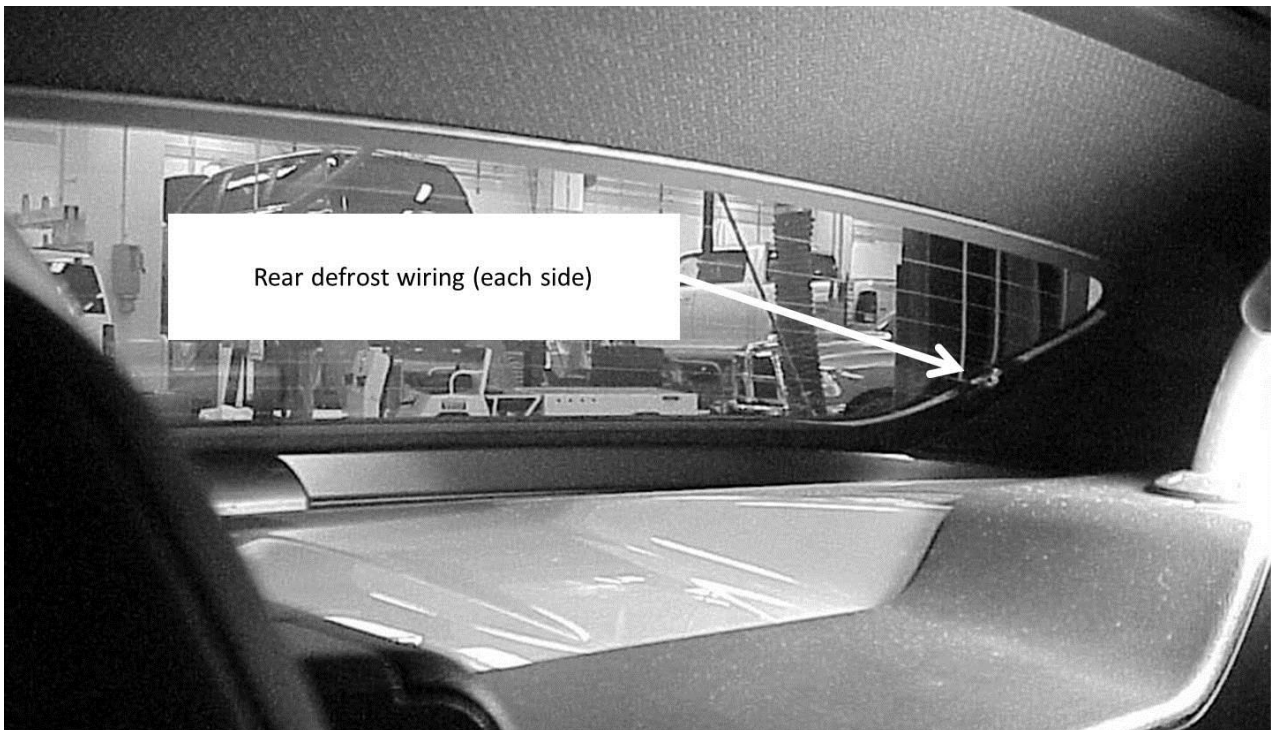


Figure 2: Rear Defrost Wiring - Left

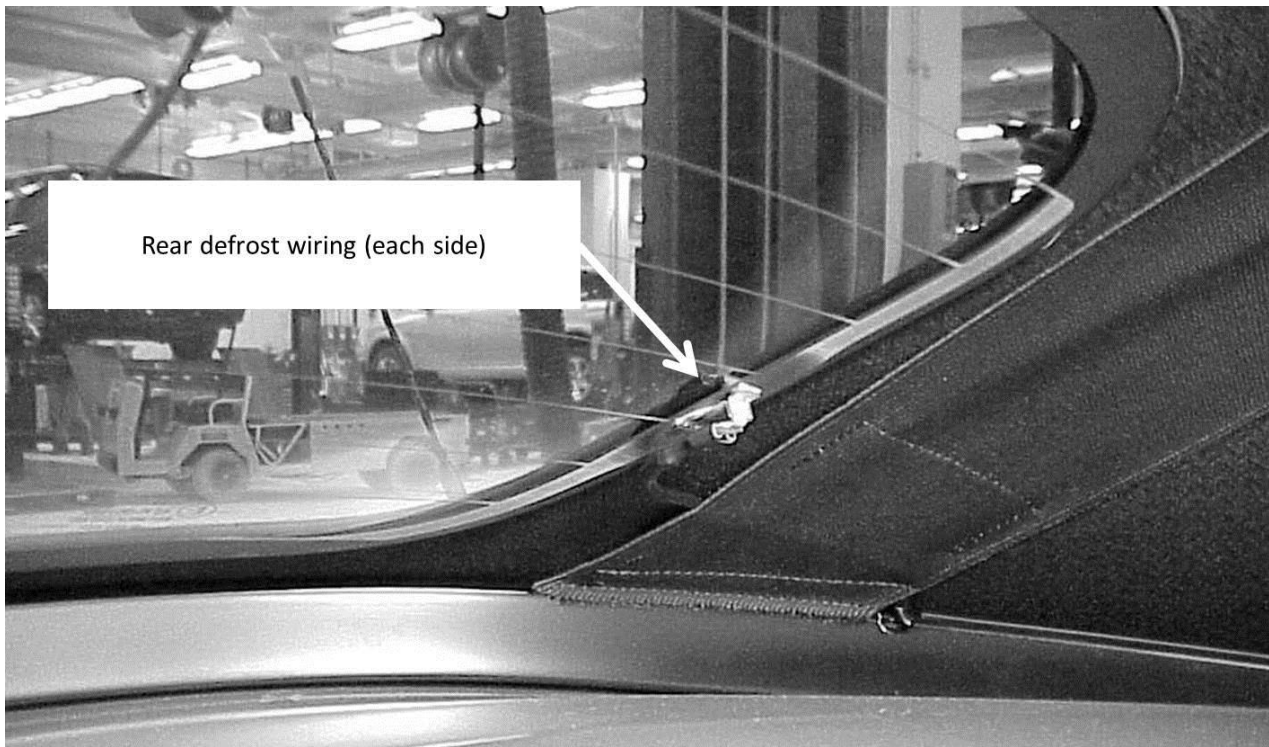


Figure 3: Rear Defrost Wiring – Left (zoom)

FCA US has conducted an in-depth analysis of the complaints made to FCA US as well as those sent by ODI. FCA US reviewed all field data and identified one customer complaint (CAIR #23461495) that relates to the alleged defect ("A back glass becoming a projectile (i.e., leaving the confines of the subject vehicle)"). The customer (3rd owner) reported that the back glass of the convertible top flew off of the vehicle while driving. FCA US has examined the full vehicle history and found no repair records related to a convertible top repair involving this owner. The convertible top was replaced by the 4th owner, approximately 17 months later. The service manager involved in that replacement described the condition of the top prior to replacement as showing clear evidence of an attempt to reattach the glass to the top fabric with some type of adhesive. The back glass was not damaged. It is the assessment of FCA US that if the window flew off the vehicle while driving, as alleged, that the back glass would have been damaged.

FCA US also reviewed the 158 VOQs provided by ODI and found zero VOQs that relate to, or may relate to the alleged defect. Of the 158 VOQs provided by ODI, FCA US found three that required further investigation to determine if they relate to, or may relate to the alleged defect.

- 1) In the first VOQ (ODI #10330824) the customer reported to NHTSA "the back glass came apart...and hit her...", but there was no report of an injury. The customer never reported this incident to FCA US. FCA US has no record in the vehicle history indicating the convertible top was repaired.

- 2) In the second VOQ (ODI #10438574) the customer initially contacted FCA US on November 29, 2011 (CAIR #21607300) to express dissatisfaction that the vehicle was not covered in the extended warranty. Following the FCA US denial to cover the replacement cost of the convertible top, on December 5, 2011 the customer again contacted FCA US (CAIR #21625775) to express dissatisfaction that the repair was not reimbursed. At that time, the customer reported to FCA US that the back glass was loose and experiencing separation from the top material. The customer did not indicate that the glass had detached completely or left the vehicle. On that same day, however, the customer filed a VOQ with NHTSA (ODI #10438574), stating "...rear windshield delaminated and became a projectile."
- 3) In the third VOQ (ODI# 10575001) the customer alleged the back window "...fell into my driver seat." In the vehicle repair history there was no mention of the glass hitting the seat, only that the glass had separated from the convertible top. The customer contacted FCA US (CAIR #248688864) seeking assistance with convertible top part availability. There is no record of any allegation made to FCA US or the FCA US dealer network related to the alleged defects.

Causal Factors, Failure Mechanisms, Mode and Warning

Exposure of the convertible top to high temperatures and high humidity over a period of time, combined with the high tension of the top fabric, may cause failures of the bonding between the back glass and the fabric top. This may lead to the separation of the back glass from the fabric convertible top. In these situations, the customer may notice a separation of the back glass from the fabric and/or an increased level of wind or road noise.

Prior to the back glass fully separating the driver would typically receive significant warning as mentioned above.

Risks to Safety

It is the assessment of FCA US that this failure mode does not present an unreasonable risk to motor vehicle safety.

Conclusion

FCA US has concluded that further investigation of the issue raised in the petition is not warranted. FCA US respectfully requests ODI deny the petition.

DP15-003

FLAT CHRYSLER

5/19/2015

ENCLOSUR 4

CAIRS Report 94

Customer Assistance Inquiry Record (CAIR)#**23461495**

VIN	1C3AN65L5	5X	Open Date	05/21/2013	Built Date	07/30/2004
Model Year	2005	Body	ZHCS27	CHRYSLER CROSSFIRE CONVERTIBLE TWO DOOR ROADSTER		
In Service Dt	11/19/2005	Mileage	55,000	Dealer Zone	32	NEW YORK
Plant	X	KARMANN ASSEMBLY PLANT	Market	U	US	
Color	P41	BLACK CLEAR COAT				
Engine	EGX	3.2L V6 SOHC 18 VALVE ENGINE				
Transmission	DED	6-SPEED MANUAL TRANSMISSION				
Dealer	26809	ROUTE 18 CHRYSLER JEEP DODGE RAM				
Dealer Address	400 ROUTE 18					
Dealer City	EAST BRUNSWICK			Dealer State	NJ	Dealer Zip 08816
Owner					Contact Type	TELEPHONE
Address					Home Phone	
	EAST BRUNSWICK NJ				Country	UNITED STATES

Product - Body / Trim / Paint Finish - Conv Top / Sunroof / T-Top -
Other - Default

Caller reports Back Glass Adhesive
failing

Briefly summarize why the customer is contacting Chrysler: Caller is seeking warranty repair for Back Glass Adhesive.

Briefly summarize what the customer is expecting:

Caller reports that the back glass on his convertible top has flown off the back of his vehicle while driving.

Caller reports he visited a dealership with this concern and was referred to a Mercedes Benz dealership, as dealer 26809 was not able to work on the Crossfire Convertible.

Writer finds no recalls or warranties showing within Agent WorkBench.

Caller reports many customers online stating that they have had this problem, and a few report getting the repair completed under warranty.

Writer researches AnswerCONNECT and finds AnswerCONNECT Answer ID 22601 which provides details on Warranty Extension X31 MY 2005 Chrysler Crossfire - Back Glass Adhesion/Backlite Cover - Extended Warranty
Writer notes: This Warranty Extension applies only to 2005 Chrysler Crossfire Roadster Convertibles shipped to dealers in the following states:

Alabama, Florida, Georgia, Louisiana, Missouri, North Carolina, South Carolina, Tennessee, Texas

Writer finds that this vehicle was sold in North Carolina 68184 SMITH STOKES CHRYSLER-DODGE-JEEP.

As per Regional Service and Recall Campaign Policy (AnswerCONNECT Answer ID 23396) Warranty Bulletin D-12-30 On occasion, vehicles located outside the affected region may experience the same condition that is the subject of a regional Recall, CSN or Warranty Extension. In the unlikely event a vehicle exhibits the condition and is not included in VIP, the Service Advisor must determine whether the vehicle should be repaired per the Recall, CSN or Warranty Extension

CALL TO DEALER: Writer attempted to contact dealer 26809 ROUTE 18 CHRYSLER JEEP DODGE RAM. Service Manager unavailable.

Writer advised customer of lines 15-30. Writer would need to advocate for customer with Service Manager for Warranty Bulletin D-12-30 consideration.

Writer advised that we would follow up with the caller once we reach the Service Manager.

Dealer Code: 26809

Dealer Personnel Required: SM

Customer s Preferred Method of Contact: Phone

Customer Phone Number (Morning):

Customer Email address: N/A

Reason for assigning to Resolution Team: End of shift/ Call to Dealer required to advocate warranty repair

Reassigned to 86T

***** 86T Notes *****

This is customer is the 3rd owner and clearly does not fit the matrix for cost assistance.

Vehicle was sold for state of Virginia (outside of warmer state codes)

Chrysler will not offer any assistance to a customer who is the 3rd owner.

Return file to HC651 to decline customer being the 3rd owner.

Customer called in upset stating that he was suppose to receive a call with updated information. Agent advised customer that chrysler will be declining any form of assistance and that his vehicle does not apply to the extended warranty that the previous agent advised him of. Customer did not understand why his vehicle was not apart of that extended warranty. Agent advised customer that This Warranty Extension applies only to 2005 Chrysler Crossfire Roadster Convertibles shipped to dealers in the following states:

Alabama, Florida, Georgia, Louisana, Missouri, North Carolina, South Carolina, Tennessee, Texas

and the reason why his vehicle was not apart of this recall was because his vehicle was shipped and build for

YAAS Build To U.S. Mkt. Specifications

4X7A Virginia Chapter-90 Recovery

647S Virginia Ship to State Code

947S Virginia Sold to State Code

as per the Sales codes on the vehicle. Customer states that he is going to file a lawsuit, agent advised that he would hate to loose customer but there is nothing further that can be done. Customer disconnected the call Agent advised that this extended warranty only applies to vehicles that were built and shipped to the following states:

Alabama, Florida, Georgia, Louisana, Missouri, North Carolina, South , Carolina, Tennessee, Texas

Agent can close cair.
