



August 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-212pco; PE15-025 Partial Response

Dear Mr. Yon:

Attached is FCA US LLC's ("FCA US") partial response to the referenced request for questions 1, 2, 3, 4, 7, 8, 10 and 12. FCA US will amend the response to all partially submitted questions as well as respond in full as described in the schedule agreed to in the email dated Wednesday, August 05, 2015 between yourself and FCA US. Full or partial responses are being provided as follows:

- Question 1: The response for all subject vehicles has been provided
- Question 2: 2007 – 2012 Jeep Wrangler ("JK") only
- Question 3: 2007 – 2012 Jeep Wrangler ("JK") only
- Question 4: 2007 – 2012 Jeep Wrangler ("JK") only
- Question 7: The response for all subject vehicles has been provided
- Question 8: The response for all subject vehicles has been provided
- Question 10: 2007 – 2012 Jeep Wrangler ("JK") only
- Question 12: The response for all subject vehicles has been provided

FCA US is submitting to the Chief Counsel's Office, via courier for next day delivery with a request for confidentiality, additional detailed information responsive to PE15-025. FCA US will ship under separate cover letter the requested exemplar parts. By providing the information contained herein, FCA US is not waiving its claim to attorney work product and attorney-client privileged communications.

Sincerely,

A handwritten signature in blue ink, appearing to read "Stephen Williams", is written over a light blue horizontal line.

Stephen Williams
Head – Vehicle Safety Compliance and Product Analysis
Attachment and 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 July 8, 2015, the date this information request was received.

This attachment contains FCA US LLC's partial response to PE15-025 and includes full or partial responses to Questions 1, 2, 3, 4, 7, 8, 10, and 12, as agreed upon with the National Highway Traffic Safety Administration's ("NHTSA") Office of Defect Investigations ("ODI") in an email from Scott Yon on August 5, 2015. Full or partial responses are being provided as follows: -

- **Question 1: The response for all subject vehicles has been provided**
 - **Question 2: 2007 – 2012 Jeep Wrangler ("JK") only**
 - **Question 3: 2007 – 2012 Jeep Wrangler ("JK") only**
 - **Question 4: 2007 – 2012 Jeep Wrangler ("JK") only**
 - **Question 7: The response for all subject vehicles has been provided**
 - **Question 8: The response for all subject vehicles has been provided**
 - **Question 10: 2007 – 2012 Jeep Wrangler ("JK") only**
 - **Question 12: The response for all subject vehicles has been provided**
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1. **State within the body of the response letter via a summary table organized by make, model and model year, the number of subject vehicles FCA has manufactured for sale or lease in the United States. Separately, for each subject vehicle manufactured to date by FCA, state the following:**
 - a. **Vehicle identification number (VIN);**
 - b. **Make;**
 - c. **Model;**
 - d. **Model Year;**
 - e. **Date of manufacture (in "yyyy/mm/dd" date format);**
 - f. **Date warranty coverage commenced (in "yyyy/mm/dd" date format);**
 - g. **The State in the United States where the vehicle was originally sold or leased (or delivered for sale or lease); and**
 - h. **Whether the vehicle is left or right hand drive (LHDIRHD).**

Provide the detailed information in Microsoft Access 2010, or a compatible format, entitled "Q1_PRODDATA.accdb" Multiple model vehicle data can be provided in separate tables within a single database file providing that the overall file size does not exceed 1GB.

A1. The subparts (a) through (h) are located in ENCLOSURE 1 and titled Q1_PRODDATA.accdb. FCA US has provided production data for the entire subject vehicle population.

2. **State the number of each of the following reports, received by FCA, or of which FCA 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 fire, crash, injury, or fatality, based on claims against the manufacturer involving a death or injury, notices received by the manufacturer alleging or proving that a death or injury was caused by a possible defect in a subject vehicle, property damage claims, consumer complaints, or field reports;**
 - d. **Property damage claims;**
 - e. **Third-party arbitration proceedings where FCA is or was a party to the arbitration; and**
 - f. **Lawsuits, both pending and closed, in which FCA is or was a defendant or codefendant.**

For subparts "a" through "f" state within the body of the response letter via a summary table the total number of each item (e.g., a. consumer complaints, b. field reports, etc.) stated 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 FCA'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. FCA US has conducted a reasonable and diligent search of the normal repositories of such information. For the 2007-2014 JK vehicles, FCA US has identified a total of 2,014 reports which relate to, or may relate to, the alleged defect in the subject vehicles, which represent 1,836 unique VINs. Included in these reports are instances where one or more of the conditions identified in the alleged defect were reported (e.g., an airbag warning light was illuminated), but it is unknown whether the fault condition is attributed to a clockspring (or related circuitry) malfunction. Moreover, included among these reports are reported conditions that lead to one or more of the field actions described in response to Q8.
- a. FCA US identified 1,824 consumer complaints (Customer Assistance Inquiry Request or CAIR and Customer Promoter Score or CPS) which relate to, or may relate to, the alleged defect in the subject vehicles, which represent 1,682 unique VINs.
 - b. FCA US identified 160 field reports which relate to, or may relate to, the alleged defect in the subject vehicles, which represent 160 unique VINs.
 - c. FCA US identified five reports involving fire, 11 reports involving a crash, 15 reports of injury, and zero reports of fatality which relate to, or may relate to, the alleged defect in the subject vehicles, which represent 18 unique VINs.
 - d. FCA US identified three reports of property damage claims which relate to, or may relate to the alleged defect in the subject vehicles, which represent three unique VINs.
 - e. FCA US identified zero reports of third-party arbitration proceedings where FCA is or was a party to the arbitration which relates to, or may relate to the alleged defect in the subject vehicles.
 - f. FCA US identified 30 legal claims, both pending and closed, in which FCA is or was a defendant or codefendant that relate to, or may relate to the alleged defect in the subject vehicles, which represent 30 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. **FCA's file number or other identifier used;**
 - b. **The category of the item, as identified in Request No.2 (i.e., a. consumer complaint, b. field report, f. lawsuits 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 (in "yyyy/mm/dd" date format);**
 - h. **Report or claim date (in "yyyy/mm/dd" date format);**
 - i. **Whether a fire or crash is alleged;**
 - j. **Whether property damage is alleged;**
 - k. **Number of alleged injuries, if any; and**

I. Number of alleged fatalities, if any.

Provide this information in Microsoft Access 2010, or a compatible format, entitled "Q3 ORDATA.accdb." Multiple model vehicle data can be provided in separate tables within a single database file providing that the overall file size does not exceed 1GB.

A3. The subparts (a) through (l) are located in ENCLOSURE 3 and titled Q3 ORDATA.accdb for the 2007 – 2014 JK vehicles. Included in these reports are instances where one or more of the conditions identified in the alleged defect were reported (e.g., an airbag warning light was illuminated), but it is unknown whether the fault condition is attributed to a clockspring (or related circuitry) malfunction. Moreover, included among these reports are reported conditions that lead to one or more of the field actions described in response to Q8.

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., a. consumer complaints, b. field reports, c. remedy reports, g. lawsuits etc.) and describe the method FCA used for organizing the documents.

A4. FCA US has conducted a reasonable and diligent search of the normal repositories of such information. For the 2007-2014 JK vehicles, the copies of the available documents related to each item within the scope of Q2 can be found in ENCLOSURE 4.

ENCLOSURE 4 contains folders with copies of the available consumer complaints, legal claims and legal summaries. The customer complaint summaries are submitted in one .pdf file and the related documents are arranged in folders by complaint number. Legal summaries are arranged in folders by the claimant name.

7. Provide a list of all airbag fault codes and their meaning for the subject vehicles (each MMY if different). Specifically identify the fault codes that may indicate a CS failure or issue?

A7. The response to Q7 located in ENCLOSURE 7 – CONF BUS INFO and titled Airbag Related DTC Codes CONF BUS INFO.xlsx which contains the complete response for all subject vehicles. Within the enclosed table, diagnostic trouble codes have been listed for the Driver Airbag. These codes indicate the ability of the Occupant Restraint Controller ("ORC") to diagnose abnormalities within the driver airbag squib. Any issues within the clockspring that cause an abnormality on the driver airbag squib, they will be diagnosable and the Airbag Warning Light ("ABWL") will be on as a result.

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 FCA 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 FCA is planning to issue within the next 120 days.

A8. FCA US's response to Q8 is located in ENCLOSURE 8 and contains the results of the search for documents that FCA US has issued externally that relate to, or may relate to, the alleged defects in all of the subject vehicles. The documents and descriptions are listed below in Table 1. FCA US has conducted a reasonable and diligent search of the normal repositories of such information.

Make-Model-Model Year	Supporting Documents	Description
2007 JK	08-067-11.pdf	Clockspring Replacement Due To Airbag Warning Lamp Illumination X41
2008-2012 JK	RC-L37-12.pdf	Safety Recall L37 / NHTSA 11V-528 Airbag System Clockspring
2008-2012 JK	RC-M31-13.pdf	Safety Recall M31 / NHTSA 13V-176 Airbag System Clockspring
2011-2012 (JS) Chrysler 200, Dodge Avenger 2011-2012 Dodge Nitro ("KA") 2011-2012 Jeep Liberty ("KK")	Safety Recall N38.pdf	Safety Recall N38 / NHTSA 13V-282 Active Head Restraints
2007-2008 (JS) Chrysler 200, Dodge Avenger	Safety Recall G14.pdf	Safety Recall G14 Seat Track Position Sensor

Table 1: Documents Shared Externally

10. Provide a summary within the body of the response letter, describing all modifications or changes made by, or on behalf of, FCA 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 vehicles. Include also any modifications to other components such as the steering column housing in order to improve the "robustness" of the CS circuit from environmental elements. For each such modification or change, provide the following detailed information in a separate attachment:

- 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 FCA is aware of which may be incorporated into vehicle production within the next 120 days.

A10. The subparts (a) through (h) are located in ENCLOSURE 10 – CONF BUS INFO. Files include change history for the following components: JK Clockspring, JK Shrouds, JK Wheel, and Steering column. This constitutes a partial response for related change history.

12. State the number of each of the following that FCA has sold that may be used in the subject vehicles by component name, part number (both service and engineering/production), model and model year of the vehicle in which it is used and month/year of sale (including the cutoff date for sales, if applicable):

- a. Subject components; and**
- b. Any kits that have been released, or developed, by FCA for use in service repairs to the subject component/assembly.**

For each component part number, provide the supplier's name, address, and appropriate point of contact (name, title, and telephone number). Also identify by make, model, model year and number sold, any other vehicles of which FCA is aware that contain the identical component, whether installed in production or in service, and state the applicable dates of production or service usage.

A12. The response to Q12 is located in ENCLOSURE 12 – CONF BUS INFO and titled Q12 - Part Sales CONF BUS INFO.xlsx. The response has been provided for the entire subject population.