

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

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 (“FCA US”).

Note: Unless indicated otherwise in the response to a question, this document contains information through February 7, 2017, the date that this information request was received.

This attachment contains FCA US LLC’s partial response to PE16-014 and includes full or partial responses to Questions 1-9 as agreed upon with the National Highway Traffic Safety Administration’s (“NHTSA”) Office of Defects Investigation (“ODI”) in an email from Scott Yon dated February 24, 2017. Full or partial responses are being provided as follows:

- Question 1: The response for all subject and peer vehicles is provided herein
- Question 2: Subject vehicles only: 2013-2017 Ram 1500 and 2014-2017 Dodge Durango
- Question 3: Subject vehicles only: 2013-2017 Ram 1500 and 2014-2017 Dodge Durango
- Question 4: Subject vehicles only: 2013-2017 Ram 1500 and 2014-2017 Dodge Durango
- Question 5: The response for all subject and peer vehicles is provided herein
- Question 6: Subject vehicles only: 2013-2017 Ram 1500 and 2014-2017 Dodge Durango
- Question 7: Subject vehicles only: 2013-2017 Ram 1500 and 2014-2017 Dodge Durango
- Question 8: Subject vehicles only: 2013-2017 Ram 1500 and 2014-2017 Dodge Durango
- Question 9: The response for all subject and peer vehicles is provided herein
- Question 10: Response will be provided April 19, 2017

Question	Subject Vehicle Response	Peer Vehicle Response
Q1 – Production	March 15, 2017	March 15, 2017
Q2, 3, 4 – Complaints/Field Data	March 15, 2017	April 19, 2017
Q5 – Warranty/Service Docs	March 15, 2017	March 15, 2017
Q6 – Test/Studies/Simulations	March 15, 2017	April 19, 2017
Q7 – Change History	March 15, 2017	April 19, 2017

Q8 – Various Engineering	March 15, 2017	April 19, 2017
Q9 – Inspection Procedures	March 15, 2017	March 15, 2017
Q10 – FCA Assessment	April 19, 2017	N/A

The below reflects the clarifications and modifications as agreed upon with the National Highway Traffic Safety Administration's ("NHTSA") Office of Defects Investigation ("ODI") in an email from Scott Yon dated February 24, 2017.

- **Subject system** – Transmission Control Module ("TCM"), Powertrain Control Module, Remote Frequency Hub, Cluster, shifter, ignition control, Electronic Parking Brake ("EPB"), transmission park/pawl system
 - **Alleged Defect - For sub part C**
 - o Exclude cannot get the vehicle out of park
 - o Exclude difficulty or confusion shifting the vehicle "from park"
 - o Include mechanical failure
 - **Question 1 – The access database will include:**
 - o g – Gear selector type - Mechanical or Rotary
 - o i – Ignition type – Push Button Start, FOB Insert, or Mechanical Key
 - o FCA US will include part numbers, versions and dates in which changes occurred in the response to Question 7
 - **Question 3 – Subparts o through u**
 - o o - Response will not include "specific location"; Orientation will be defined as Incline (nose up/nose down), Flat ground
 - o p – Direction of movement is defined as: forward or rearward
 - o q – Response will include whether engine running or not
 - o r – Position of gear selector defined as: after the event
 - o s – Operator position to vehicle is defined as: in vehicle, partially out of vehicle, clear of vehicle (if clear of vehicle – proximity)
 - o t and u – Response will include "powered"/"unpowered" if possible to determine
 - o v – Response will include a separate Access database
 - **Question 5 – Response will only include service relating to shifting vehicle into Park.**
 - **Question 6 – Response will include documents relating to shifting vehicle into and out of Park**
 - **Question 7 – Response will only include documents relating to shifting vehicle into Park**
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1. **State, by model and model year, the number of subject and peer vehicles FCA has manufactured for sale or lease in the United States. Separately, for each subject and peer vehicle manufactured to date by FCA, state the following:**
 - a. **Vehicle identification number (VIN);**
 - b. **Whether the vehicle is subject or peer;**
 - c. **Make;**
 - d. **Model;**
 - e. **Model Year;**
 - f. **Date of manufacture;**
 - g. **Gear selector type (mechanical or rotary shift, and if rotary shift, differentiate by version, supplier, and control logic version³, if more than one control strategy was used in the subject and peer vehicles);**
 - h. **Transmission type (e.g., 8 speed, 9 speed, etc.);**
 - i. **Type, design version, and control logic version of ignition switch mechanism (e.g. push button start, fob insert, or mechanical ignition key)**
 - j. **Date warranty coverage commenced; and**
 - k. **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 "PE16_014_PRODUCTION DATA."

A1. The subparts (a) through (k) are located in ENCLOSURE 01 and titled PE16_014_PRODUCTION DATA.accdb.

2. **State the number of each of the following, by subject and peer vehicle, received by FCA, or of which FCA 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, 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 or peer 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 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 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. FCA US has identified a total of 834 reports which relate to, or may relate to, the alleged defect in the subject vehicles, which represent 558 unique VINs.
- a. FCA US identified 531 consumer complaints (Customer Assistance Inquiry Record ("CAIR") and Customer Promoter Score ("CPS")) which relate to, or may relate to, the alleged defect in the subject vehicles, which represent 453 unique VINs.
 - b. FCA US identified 146 field reports which relate to, or may relate to, the alleged defect in the subject vehicles, which represent 138 unique VINs.
 - c. FCA US identified 355 reports involving a crash, with 92 injuries reported, and one report of a fatality which relate to, or may relate to, the alleged defect in the subject vehicles, which represent 203 unique VINs.
 - d. FCA US identified 355 reports of property damage claims which relate to, or may relate to the alleged defect in the subject vehicles, which represent 200 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, which represent zero unique VINs.
 - f. FCA US identified 157 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 157 unique VINs.

Per the agreement between FCA US and NHTSA's ODI on February 24, 2017, the response to Q2 in respect to the peer vehicles will be provided on or before April 19, 2017.

- 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., consumer complaint, field report, etc.);**
 - c. **Vehicle owner or fleet name (and fleet contact person), street address, email address and telephone number; ·**
 - d. **Vehicle's VIN;**
 - e. **Subject or peer vehicle;**
 - f. **Vehicle's make, model and 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 property damage is alleged;
- l. Number of alleged injuries, if any;
- m. Number of alleged fatalities, if any;
- n. Whether the incident was investigated by FCA;
- o. The specific location and orientation of the vehicle prior to movement;
- p. The direction of movement;
- q. Whether the engine was running;
- r. The position of the gear selector mechanism as reported by the operator;
- s. Whether the operator was out of the vehicle at the time of the event, and if so their proximity to the vehicle at the time of the event;
- t. Whether the report alleges one or more incidents of unpowered rollaway (i.e., incidents occurring with the engine off, or with the transmission in a neutral-like state);
- u. Whether the report alleges one or more incidents of powered rollaway (i.e., incidents occurring with the engine running and powering the vehicle movement);
- v. A summary of all service repairs performed on the subject system in connection with the alleged incident(s);
- w. Diagnostic Trouble Codes (DTC) if any present and their description; and,
- x. FCA's assessment of the cause of the incident, including but not limited to the following
 - i) The position of the gear selector mechanism when the movement occurred;
 - ii) The transmission gear engaged when the movement occurred;
 - iii) Whether a fault in the subject system, or any other vehicle system/component, caused or contributed to the incident;

Provide this information in Microsoft Access 2010, or a compatible format, entitled "PE16_014_REQUEST NUMBER THREE DATA."

A3. The subparts (a) through (x) are located in ENCLOSURE 03 and titled PE16_014_REQUEST NUMBER THREE SUBJECT DATA.accdb. Service repairs performed on the subject system after the date of incident which may relate to the alleged defect are located in ENCLOSURE 03 and titled PE16_014_REQUEST NUMBER THREE SUBJECT SERVICE_REPAIRS Data.accdb

Per the agreement between FCA US and NHTSA's ODI on February 24, 2017, the response to Q3 in respect to the peer vehicles will be provided on or before April 19, 2017.

4. 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 FCA used for organizing the documents. Describe in detail the search methods and search criteria used by FCA to identify the items in response to Request No.3.

A4. FCA US has conducted a reasonable and diligent search of the normal repositories of such information. Documents related to each item within the scope of Q3 were gathered by using information such as vehicle model, model year, and a word search using words reasonably related to the reports sought by this Information Request. The results of this search were then subjected to an eyes-on review to determine if they relate to, or may relate to the alleged defect.

The copies of the available documents related to each item within the scope of Q3 can be found in ENCLOSURE 04.

ENCLOSURE 04 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.

Per the agreement between FCA US and NHTSA's ODI on February 24, 2017, the response to Q4 in respect to the peer vehicles will be provided on or before April 19, 2017.

5. Produce copies of all service, warranty, and other documents that relate to, or may relate to, the alleged defect in the subject and peer 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.
- A5. FCA US' response to Q5 is located in ENCLOSURE 05 by model and model year. ENCLOSURE 05 contains the results of the search for documents that FCA US has issued externally that relate to, or may relate to, the alleged defect in the subject and peer vehicles. The title and subject of each document is listed in Table 1. FCA US has conducted a reasonable and diligent search of the normal repositories of such information.

Document Title	Subject	Affected Vehicle
08-038-16 Flash - EPB Module Enhancement.pdf	This bulletin involves updating the EPB module software.	2015-2016 MY Chrysler 200
08-082-14 Flash - Electronic Shift Module (ESM) Enhancement.pdf	This bulletin involves updating the software in the Electronic Shift Module.	2015 MY Chrysler 200
RC-R08-15 Safety Recall R08 - Transaxle Park Rod.pdf	The transaxle's internal park rod may have been damaged during the manufacturing process. Also, debris may have been generated during the transaxle assembly process which could bind the park pawl.	2015 MY Chrysler 200
TT9003034 Auto Trans Rotary Electronic Shifter.pdf	Part replacement guidance and feedback.	2014 MY Dodge Durango
RC-N65-14 Safety Recall N65 - Transmission	The transmission output shaft may fracture while driving. If the vehicle experiences this condition there	2013 MY Ram 1500

Output Shaft.pdf	will be a loss of motive power. The condition may also prevent the transmission from being shifted into the "Park" position, the inability to turn off the engine, an instrument cluster warning lamp illumination, and the vehicle could experience unintended vehicle movement after exiting the vehicle. The above conditions could cause a crash under certain driving conditions.	
RC-N22-13 Safety Recall N22 - Park Brake Cable Equalizer.pdf	The park brake cable equalizer may not be properly adjusted. These vehicles may fail to conform to Federal Motor Vehicle Safety Standard (FMVSS) No. 135 - Light Vehicle Brake Systems. This condition could allow the vehicle to move inadvertently while the park brake is applied and cause a crash without warning.	2013 MY Ram 1500
08-006-15 REV A Flash - Incorrect Language Displayed In The Cluster And Odome.pdf	This bulletin involves reprogramming the Instrument Panel Cluster ("IPC") with updated software.	2014 MY Ram 1500
21-025-15 REV A Flash - 854RE Transmission Shift Enhancements.pdf	This bulletin involves reprogramming the TCM with the latest available software.	2015 MY Ram 1500
21-036-16 Flash - 845RE Transmission Shift Enhancements.pdf	This bulletin involves reprogramming the TCM with the latest available software.	2015 MY Ram 1500

Table 1: Documents Shared Externally

6. 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 (including all human factors analyses) in the subject and peer vehicles that have been conducted, are being conducted, are planned, or are being planned by, or for, FCA. 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.

A6. The subparts (a) through (f) are located in ENCLOSURE 06 and titled Q6 Testing Summary CONF BUS INFO.xlsx. Representative copies of responsive reports are included within ENCLOSURE 06.

Per the agreement between FCA US and NHTSA's ODI on February 24, 2017, the response to Q6 in respect to the peer vehicles will be provided on or before April 19, 2017.

7. Describe all modifications or changes in the system and control logic made by, or on behalf of, FCA in the design, material composition, manufacture, software/firmware, quality control, supply, or installation of the subject system, 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 version/revision number(s) for software/firmware changes and part number(s) (service and engineering) of the original component;
- e. The version/revision number(s) for software/firmware changes and 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.

A7. The subparts (a) through (h) are located in ENCLOSURE 07 and titled Q7 Change History CONF BUS INFO.xlsx. Representative copies of responsive reports are included within ENCLOSURE 07.

Per the agreement between FCA US and NHTSA's ODI on February 24, 2017, the response to Q7 in respect to the peer vehicles will be provided on or before April 19, 2017.

8. Provide the following information for each version of the subject system installed in the subject and peer vehicles:

- a. Provide a functional block diagram of the subject systems;
- b. Describe all system design characteristics and related diagnostics incorporated to prevent unintended gear selection from occurring, including mismatches between displayed and actual gear positions or failure of the transmission to achieve a selected gear position;
- c. Describe all system control logic, warnings, displays or ergonomic design characteristics used by FCA to reduce the possibility for the operator to exit the vehicle with the

transmission unintentionally left in a position other than Park and/or to prevent unintended vehicle movement from occurring;

- d. Describe, and provide copies of all documents related to, all design failure mode and effects analyses (DFMEA) and fault tree analyses (FTA) of the subject system that relate in any way to unintended vehicle movement as the driver is exiting or after the driver has exited the vehicle;
- e. Describe, and provide copies of all documents relating to, all human factors/human machine interface testing, studies or expert evaluations that may be related to the alleged defect in the subject and peer vehicles;
- f. Describe the response of the subject system if the operator switches, or attempts to switch the engine off when the gear selector is not in Park;
- g. Describe any or all conditions under which the subject system will automatically shift the transmission to Park;
- h. Describe any and all conditions under which the subject system will automatically shift to Neutral, including all associated warnings/messages provided to the operator;
- i. Describe any "start-stop" technology for the engine, which may be actuated for fuel efficiency and/or safety reasons and how it interacts with the transmission control system;
- j. Describe any override control logic and timing relative to transmission gear position, engine status, vehicle speed, service brake switch status, and driver's door switch status which may be entered into via a sequence of driver operations (e.g. "car wash mode");
- k. Describe any fault remediation strategies for instances where a disagreement exists between the position of the shifter and the actual gear status of the transmission;
- l. Describe and provide video and audio recordings of all warnings provided to the operator and all automatic control functions of the subject and electronic park brake systems (as may be equipped) for the following situations:
 - i) The driver's door is opened when the engine is running and the gear selector is not in Park;
 - ii) The driver's door is opened when the engine is off and the gear selector is not in Park;
 - iii) The driver's door is opened when the engine is running and the gear selector is in Park;
 - iv) The operator attempts to operate the ignition control when the engine is running and the gear selector is not in Park;
 - v) The vehicle is moving and the operator attempts to shift to Park (include speed thresholds for the control logic related to this function);
 - vi) Any other state or circumstance FCA believes is pertinent;
- m. State whether any of the subject or peer vehicles have a hill-assist function or other system which may act to hold the vehicle at a standstill, even if the brake pedal is released, and if so identify the make, model and model year for each; and
- n. State whether FCA has ever considered adopting control logic for the subject systems that automatically shift to Park if the system detects signals (e.g., driver's door opens) indicating that the driver may be exiting the vehicle when the gear selector is not in Park and, if so, the reasons why such control logic either was or was not adopted.

- A8a. Documents responsive to subpart (a), relative to the subject vehicles, are located in ENCLOSURE 08 and titled ESS_Block_Diagram CONF BUS INFO.pdf and nonESS_Block_Diagram CONF BUS INFO.pdf.
- A8b. Documents responsive to subpart (b), relative to the subject vehicles, are located in ENCLOSURE 08 and titled Q8b CONF BUS INFO.pdf.
- A8c. Documents responsive to subpart (c), relative to the subject vehicles, are located in ENCLOSURE 08 and titled Q8c CONF BUS INFO.pdf.
- A8d. Documents responsive to subpart (d), relative to the subject vehicles, are located in ENCLOSURE 08 and titled Q8d.pdf.
- A8e. Documents responsive to subpart (e) are located in ENCLOSURE 06. Descriptions of responsive documents are included ENCLOSURE 08 and titled Q8e CONF BUS INFO.pdf.
- A8f. Vehicle behavior responsive to subpart (f) is located in ENCLOSURE 08 in the documents responsive to Q8l.pdf reference sub part (iv)
- A8g. Documents responsive to subpart (g) are located in ENCLOSURE 08 and titled Q8g.pdf.
- A8h. Documents responsive to subpart (h), relative to the subject vehicles, are located in ENCLOSURE 08 and titled Q8h CONF BUS INFO.pdf.
- A8i. Documents responsive to subpart (i), relative to the subject vehicles, are located in ENCLOSURE 08 and titled Q8i.pdf.
- A8j. Documents responsive to subpart (j), relative to the subject vehicles, are located in ENCLOSURE 08 and titled Q8j.pdf.
- A8k. Documents responsive to subpart (k), relative to the subject vehicles, are located in ENCLOSURE 08 and titled Q8k.pdf.
- A8l. Documents responsive to subpart (l), relative to the subject vehicles, are located in ENCLOSURE 08 and titled Q8l.pdf.
- A8m. Documents responsive to subpart (m), relative to the subject vehicles, are located in ENCLOSURE 08 and titled Q8m.pdf.
- A8n. Documents responsive to subpart (n), relative to the subject vehicles, are located in ENCLOSURE 08 and titled Q8n.pdf and FCA Auto Park 2_9_2017 Final CONF BUS INFO. pdf

Per the agreement between FCA US and NHTSA's ODI on February 24, 2017, the response to Q8 in respect to the peer vehicles will be provided on or before April 19, 2017.

- 9. Describe all inspection and data collection procedures used by FCA, or by any third party working on FCA's behalf to investigate allegations of property damage, crashes or injuries that may be related to the alleged defect, including whether and how information stored in the Event Data Recorder or other control modules is collected and used.**

A9. FCA US will perform an inspection per an agreed upon written protocol with interested parties. The information collected would consist of; information provided by the Driver, Witnesses, Police Report, wi-TECH diagnostics of the various vehicle modules, pictures of the vehicle's interior, exterior, engine compartment and underbelly, pictures of the accident scene with any associated damage and marks, Event Data Recorder ("EDR") Data, and the operation of the vehicle's shifter, shifter interlocks, etc., while being monitored by the wi-TECH or Engineering tool. The information gathered by the wi-TECH tool allows FCA US to determine if any fault codes are active or stored in the various electronic modules, monitor various systems during the inspection as they are operated. EDR Data, if recorded, will provide vehicle specific parameters to review.

10. Furnish FCA's assessment of the alleged defect in the subject vehicle, including:

- a. All circumstances that FCA has identified that could result in the subject system shifting to, or remaining in neutral or other non-Park gear position when the driver shifts, or attempts to shift to Park;**
- b. All vehicle design and human factors (including causal or contributory factors) related to the potential for unintended/unexpected shift to Neutral or other non-Park gear position when a driver is attempting to park a subject or peer vehicle, including specific event sequence diagrams for the operator control actions/inputs necessary for each scenario described;**
- c. The causal or contributory factor(s);**
- d. The failure mechanism(s);**
- e. The failure mode(s);**
- f. The risk to motor vehicle safety that it poses;**
- g. What warnings, if any, the operator and the other persons both inside and outside of the vehicle would have that the alleged defect was occurring or that the subject system was malfunctioning; and**
- h. The reports included with this inquiry.**

A10. Per the agreement between FCA US and NHTSA's ODI on February 24, 2017, the response to Q10 in respect to the subject and peer vehicles will be provided on or before April 19, 2017.