



May 6, 2016

Mr. Otto G. Matheke, III  
Office of Defects Investigation  
U.S. Department of Transportation

National Highway Traffic Safety Administration  
Office of Defects Investigation  
Room W41-326  
1200 New Jersey Avenue SE  
Washington, D.C. 20590

Reference 

Dear Mr. Matheke:

Attached is FCA US LLC's ("FCA US") response of the referenced information request. The attached constitutes a full submission to EA16-002.

FCA US is submitting to the Chief Counsel's Office, via courier for next day delivery with a request for confidentiality, and additional detailed information responsive to EA16-002.

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 "S. Williams", is written over the typed name.

Stephen L. Williams  
Head, Vehicle Safety Compliance and Product Analysis

Attachment and Enclosures

Mr. Otto Matheke

Reference: [REDACTED]

May 5, 2016

ATTACHMENT

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**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. Case No. 09-50002).

Effective December 15, 2014, Chrysler Group LLC changed its name to FCA US LLC.

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**Note: Unless indicated otherwise in the response to a question, this document contains information up to March 22, 2016, the date this information request was received.**

**In response to Q2, and in relation to the Jeep Grand Cherokee vehicles, FCA US is only providing updated data gathered by FCA US between October 6, 2015 and March 22, 2016 when FCA US received this Information Request.**

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1. **State, by 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. **Shifter type (e.g., monostable, Polystable, etc.);**
  - f. **Whether the vehicle has the Hill Start Assist feature;**
  - g. **Date of manufacture;**
  - h. **Date warranty coverage commenced; and**
  - i. **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." A pre-formatted data collection file, which provides further details regarding this submission, will be provided to you.**

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

2. **State the number of each of the following, 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 crash, injury or fatality;**
  - 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. Counts for 2014-2015 MY Jeep Grand Cherokee vehicles, as provided in response to PE15-030, are not being re-provided with this response.

FCA US has conducted a reasonable and diligent search of the normal repositories of such information. FCA US has identified a total of 228 additional reports which relate to, or may relate to, the alleged defect in the Jeep Grand Cherokee (“WK”) vehicles, which represent 187 unique VINs.

- a. FCA US identified 173 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 164 unique VINs.
- b. FCA US identified 22 field reports which relate to, or may relate to, the alleged defect in the subject vehicles, which represent 20 unique VINs.
- c. FCA US identified 72 reports involving a crash, with 21 injuries reported, and zero reports of fatality which relate to, or may relate to, the alleged defect in the subject vehicles, which represent 44 unique VINs for crashes and 12 unique VINs for injuries.
- d. FCA US identified 68 reports of property damage claims which relate to, or may relate to the alleged defect in the subject vehicles, which represent 41 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 represents zero unique VIN.
- f. FCA US identified 33 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 33 unique VINs.

FCA US has identified a total of 549 reports which relate to, or may relate to, the alleged defect in the Chrysler 300 (“LX”) and Dodge Charger (“LD”) vehicles, which represent 451 unique VINs.

- a. FCA US identified 416 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 375 unique VINs.
- b. FCA US identified 92 field reports which relate to, or may relate to, the alleged defect in the subject vehicles, which represent 89 unique VINs.
- c. FCA US identified 118 reports involving a crash, with 23 injuries reported, and zero reports of fatality which relate to, or may relate to, the alleged defect in the subject vehicles, which represent 70 unique VINs for crashes and 11 unique VINs for injuries.
- d. FCA US identified 111 reports of property damage claims which relate to, or may relate to the alleged defect in the subject vehicles, which represent 66 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 41 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 41 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., 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. Vehicle's make, model and model year;
- f. Vehicle's mileage at time of incident;
- g. Incident date;
- h. Report or claim date;
- i. Whether a crash is alleged;
- j. Whether property damage is alleged;
- k. Number of alleged injuries, if any; and
- l. Number of alleged fatalities, if any.

**Provide this information in Microsoft Access 2010, or a compatible format, entitled "REQUEST NUMBER TWO DATA." A pre-formatted data collection file, which provides further details regarding this submission, will be provided to you.**

A3. The subparts (a) through (l) are located in ENCLOSURE 03 and titled 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 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.2.**

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 Q2 were gathered by using information such as vehicle model, model year, and a keyword 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

A copy of the available documents related to each item within the scope of Q2 can be found in ENCLOSURE 04.

ENCLOSURE 04 contains folders with a copy 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.

The words used to search for items within the scope of Q2 are shown below in Table 1. The same word search was utilized for Jeep Grand Cherokee, Dodge Charger and Chrysler 300 vehicles. A report had to match a word from each category to be returned for review. All results returned from the keyword search were subjected to an eyes-on review to determine if they relate to, or may relate to

the alleged defect. Please note that the term "roll" is included in both categories. Therefore, any report with the term "roll" was returned and subjected to an eyes-on review.

Keyword Category 1	Keyword Category 2
% roll	gear shift
in park	Shifter
into park	Shifted
out of park	Shifting
parking	rolled away
parked	Moving
rollaway	% moved
roll away	% roll
	rolled down
	rolled back

Table 1: Keyword Search Terms

5. State, by model and model year, a total count for all of the following categories of claims, collectively, that have been paid by FCA to date that relate to, or may relate to, the alleged defect in the subject vehicles: warranty claims; extended warranty claims; claims for good will services that were provided; field, zone, or similar adjustments and reimbursements; and warranty claims or repairs made in accordance with a procedure specified in a technical service bulletin or customer satisfaction campaign.

Separately, for each such claim, state the following information:

- a. FCA's claim number;
- b. Vehicle owner or fleet name (and fleet contact person), street address, email address and telephone number;
- c. VIN;
- d. Repair date;
- e. Vehicle mileage at time of repair;
- f. Repairing dealer's or facility's name, telephone number, city and state or ZIP code;
- g. Labor operation number(s);
- h. Problem code(s);
- i. Diagnostic trouble code(s);
- j. Replacement part number(s) and description(s);
- k. Concern stated by customer;

- l. Cause as stated on the repair order;**
- m. Correction as stated on the repair order; and**
- n. Additional comments, if any, by dealer/technician relating to claim and/or repair.**

**Provide this information in Microsoft Access 2010, or a compatible format, entitled "WARRANTY DATA." A pre-formatted data collection file, which provides further details regarding this submission, will be provided to you.**

A5. The subparts (a) through (n) are located in ENCLOSURE 05 and titled WARRANTY DATA.accdb. Diagnostic Trouble Code ("DTC") information is not normally captured as part of the warranty system records for a claim. These codes may be available if the technician enters them into the narrative manually, but are not required from the technician, nor are the codes able to be pulled automatically.

**6. Describe in detail the search methods and search criteria used by FCA to identify the claims in response to Request No.5, including the labor operations, problem codes, diagnostic trouble codes, part numbers and any other pertinent parameters used.**

**Provide a list of all labor operations, labor operation descriptions, problem codes, and problem code descriptions, diagnostic trouble codes and diagnostic trouble code descriptions applicable to the alleged defect in the subject vehicles. State whether the diagnostic trouble codes are automatically reported to the warranty database electronically or manually entered into the warranty database by a claims administrator.**

**State, by make and model year, the terms of the new vehicle warranty coverage offered by FCA on the subject vehicles (i.e., the number of months and mileage for which coverage is provided and the vehicle systems that are covered.)**

A6. In order to identify the claims detailed in the response to Q5, FCA US searched the normal repositories utilizing the Labor Operations associated with the shifter and gearshift knob. The Labor Operations and descriptions are found in Table 2.

<b>LOP</b>	<b>LOP Description</b>
217513	Gearshift Knob
210103	Automatic Transmission Shifter
081977	Electronic Shifter Module

**Table 2: LOPs Used to Search Warranty Claims**

A list of all LOPs, LOP descriptions, DTCs and DTC descriptions potentially related to the alleged defect in the subject vehicles is located in ENCLOSURE 06 and titled LOP DTC and Problem Codes.pdf. As stated in the response to Q5, DTC information is not normally captured as part of the warranty system records for a claim. DTC information may be available if the technician enters into the narrative manually, but is not required from the technician, nor are DTC's able to be pulled automatically.

To identify which of these warranty items related to the alleged defect a keyword search using words reasonably related to the reports sought by this Information Request was applied. This keyword search narrowed the search from all LOPs completed to those completed for reasons that are reasonably related to the alleged defect. 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 words used to search for items within the scope of Q6 are shown below in Table 3. A report that matched any keyword from this table was returned for an eyes-on review.

<b>Keyword Category 1</b>
% roll
in park
into park
out of park
Parking
Parked
Rollaway
roll away
in to park

**Table 3: Warranty Keyword Search**

New vehicle warranty coverage offered by FCA US on the subject and peer vehicles is basic limited warranty, 3 years/36,000 miles, powertrain limited warranty 5 years/100,000 miles, corrosion limited warranty for outer panels 5 years/100,000 miles and road side assistance 5 years/100,000 miles.

- 7. 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.**
  
- A7. FCA US' response to Q7 is located in ENCLOSURE 07 and contains the results of a search for documents that FCA US has issued externally that relate to, or may relate to, the alleged defect in the subject vehicles. The document and description are listed below in Table 4. FCA US has conducted a reasonable and diligent search of the normal repositories of such information.

Supporting Document(s)	Description	Model Year	Affected Vehicle
21-009-14	Service Bulletin for Transmission Control Module Software Updates Shifter Module (ESM)	2014 MY	Jeep Grand Cherokee
RC-IM08-12	CSN M08 Gear Shift Indicator Light Brightness	2012 MY	Dodge Charger and Chrysler 300

Table 4: Documents Shared Externally

Service Bulletin 21-009-14 affects the 2014 MY WK vehicles. Some customers may indicate that the rolling reverse to drive shift quality may not meet their expectations. This bulletin involves flash reprogramming of the Transmission Control Module ("TCM") with new software which improves/corrects the customer concern.

Customer Satisfaction Notification M08 (RC-IM08-12) affects both the 2012 MY LD and LX vehicles. The gear shift indicator light on about 18,000 vehicles may be brighter than other instrument panel components during night time driving.

Neither of the above dealer communications (08-072-14 and RC-IM08-12) relate to the alleged defect in the subject vehicles.

8. 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 in the subject 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:
- Action title or identifier;
  - The actual or planned start date;
  - The actual or expected end date;
  - Brief summary of the subject and objective of the action;
  - Engineering group(s)/supplier(s) responsible for designing and for conducting the action; and
  - 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.

- A8. During production design, development and validation, FCA US conducted thorough and complete testing for the 2014-2015 MY Jeep Grand Cherokee and 2012-2014 MY Dodge Charger and Chrysler 300 monostable shifter system. FCA US has reviewed the data supplied by ODI as well as the internal

complaints and field reports identified as part of this investigation. Production validation testing revealed that no mechanical or electrical, design or manufacturing issues exist.

After submission of PE15-030 on November 27, 2015, FCA US conducted additional assessments. ODI requested FCA US to investigate an alleged roll away complaint in Alaska. Analysis, provided to NHTSA on March 3, 2016, revealed the vehicle was performing as designed.

FCA US has bought back a vehicle (CAIR # [REDACTED] previously provided in PE15-030) and was unable to duplicate the concern. The vehicle has been subjected to testing in an attempt to duplicate the customer concern, but FCA US is still unable to replicate the issue.

The subparts (a) through (f) are located in ENCLOSURE 08 in a document titled Q8 - Testing Summary Combined CONF BUS INFO.pdf. Previous testing for 2014-2015 MY Jeep Grand Cherokee vehicles, as provided in response to PE15-030, is not being provided with this response.

- 9. Describe 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. 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 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.**

A9. The subparts (a) through (h) are located in ENCLOSURE 09 in a document titled Q9 - Change History Combined CONF BUS INFO.pdf. Change history for 2014-2015 MY Jeep Grand Cherokee vehicles, as provided in response to PE15-030, is not being provided with this response.

- 10. Identify by make, model and model year, all other FCA vehicles that contain Monostable gear shift assemblies, whether installed as production or service parts, and state the applicable dates of production or service usage.**

A10. The vehicles built by FCA US which contain a monostable gear shift assembly and the applicable dates of production can be found below in Table 5. The 2014-2015 MY Jeep Grand Cherokee vehicles had the monostable shifter as standard equipment. On the 2012-2014 MY Dodge Charger and Chrysler 300 vehicles, the monostable shifter was only available on vehicles equipped with the 3.6L engine and an 8-speed transmission. Certain Dodge Charger vehicles with a 3.6L engine developed for police fleets have a conventional mechanical shifter. Certain Dodge Charger and Chrysler 300 equipped with the 3.6L engine and a 5-speed transmission have a conventional mechanical shifter.

Shifter	Model(s)	Model Year(s)	Production Dates
Monostable	Jeep Grand Cherokee	2014-2015	July 16, 2012 – December 22, 2015
Monostable	Dodge Charger	2012-2014	February 15, 2011 – November 27, 2014
Monostable	Chrysler 300	2012-2014	February 15, 2011 – November 27, 2014

Table 5: Monostable Gear Shift Assemblies in FCA US Vehicles

11. For each version of the subject system used in the subject vehicles, describe and provide video, with audio, recordings of all warnings provided to the operator when the driver's door is opened in the following situations:
- The engine is running and the vehicle shifter is in Park;
  - The engine is running and the vehicle shifter is not in Park; and
  - The engine is off and the vehicle shifter is not in Park.

A11. The subparts (a) through (c) are located in ENCLOSURE 11 and consist of multiple .wmv video files. A description of the content in subparts (a) through (c) can be found below in Table 6. Videos relating to 2014-2015 MY Jeep Grand Cherokee vehicles, as provided in response to PE15-030, are not being provided with this response.

File Name	Description of Content
2012 300_ CH179552.wmv	Video showing a 2012 MY Chrysler 300 warnings to customers when the shifter is in various gears with the door open and shut.
2012 Charger_ CH183658.wmv	Video showing a 2012 MY Dodge Charger warnings to customers when the shifter is in various gears with the door open and shut.
2013 300_ DH707406.wmv	Video showing a 2013 MY Chrysler 300 warnings to customers when the shifter is in various gears with the door open and shut.
2013 Charger_ DH655655.wmv	Video showing a 2013 MY Dodge Charger warnings to customers when the shifter is in various gears with the door open and shut.
2014 300_ EH255679.wmv	Video showing a 2014 MY Chrysler 300 warnings to customers when the shifter is in various gears with the door open and shut.

<b>File Name</b>	<b>Description of Content</b>
2014 Charger_ EH208994.wmv	Video showing a 2014 MY Dodge Charger warnings to customers when the shifter is in various gears with the door open and shut.

**Table 6: Video File Descriptions**

The Jeep Grand Cherokee vehicle videos provided in response to PE15-030 show the warnings to the operator in many different circumstances including:

- Engine on with the vehicle shifter in the Park position with Park Sense™ both on and off with the door open and closed.
  - When the door is open and the vehicle is in park the EVIC will display the door ajar telltale.
- Engine on with the vehicle shifter in a position other than Park with Park Sense™ both on and off with the door open and closed.
  - When the door is open and the vehicle shifter is Drive or Neutral position the EVIC will display “Vehicle Not in Park”, display the door ajar telltale and will give an audible chime
  - When the door is open and the vehicle shifter is Reverse position with Park Sense™ off the EVIC will display “Vehicle Not in Park”, display the door ajar telltale and will give an audible chime
    - In Reverse when Park Sense™ on the Park Sense™ display takes priority to notify the operator of objects in the vicinity of the vehicle.

The Dodge Charger and Chrysler 300 vehicle videos provided show the warnings to the operator in many different circumstances including:

- Engine on with the vehicle shifter in the Park position with the door open and closed.
  - When the door is open and the vehicle is in park the EVIC will display the door ajar telltale.
- Engine on with the vehicle shifter in a position other than Park with the door open and closed.
  - When the door is open and the vehicle shifter is in Drive position, the EVIC will display the shifter position and the door ajar telltale;
  - When the door is open and the vehicle shifter is Reverse position the EVIC will display the shifter position and the door ajar telltale.

It should be noted that when the vehicle speed is below 5 mph the engine cannot be turned off unless the park system is securely engaged. The warnings shown within the attached videos notify customers that the vehicle is not in Park when they attempt to turn off the vehicle if the shifter is in a position other than Park. FCA US believes that the virtually universal "causal or contributory factor" of unintended vehicle movement in the subject vehicles is the driver's decision to exit the vehicle with the engine running and without confirming that the vehicle is in Park or choosing not to set the parking brake as directed in all documentation provided with the vehicle.

Relative to the alleged inadvertent vehicle movement, the Owner’s Manual, User’s Guide, Tip Card and Owner’s Information DVD for the subject vehicles provide clear and concise instructions to ensure the vehicle is properly placed in Park and contain explicit warnings of what may occur if these

instructions are ignored. In addition, the electronic gear position indicator (“PRND/S”) will always display the correct gear, informing the operator of the state of the transmission. Further, if the vehicle is left in Reverse, the Reverse lamps will be illuminated and the back-up camera will be displayed on the radio screen (if equipped).

Excerpts from the Owner’s Manual, User’s Guide and Tip Card are included in ENCLOSURE 11, which provide FCA US’ recommendations relating to the proper use of the monostable gear shifter and the warnings associated with potentially using the Park position as a substitute for applying the parking brake. A copy of the Owner’s Information DVD for the 2015 Jeep Grand Cherokee was previously provided with FCA US’ response to PE15-030 and it not being provided again with this response. Copies of the Owner’s Information DVD for the 2012-2014 MY Dodge Charger and Chrysler 300 have been included with FCA US’ response to this information request.

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

- a. The causal or contributory factor(s);**
- b. The effectiveness of, or weakness thereof, any warnings to the driver that the driver's door has been opened with the engine on and the vehicle not in Park, including a hierarchy of warnings to the driver;**
- c. The failure mechanism(s);**
- d. The failure mode(s);**
- e. The risk to motor vehicle safety that it poses;**
- f. What warnings, if any, the operator and the other persons both inside and outside the vehicle would have that the alleged defect was occurring or subject component was malfunctioning; and**
- g. The reports included with this inquiry.**

A12. On April 19, 2016, the Vehicle Regulations Committee decided to conduct a voluntary safety recall on the subject vehicles. On April 22, 2016, FCA US filed its Part 573 Defect Information Report informing NHTSA of its intent to conduct a recall.

FCA US believes this voluntary field action brings this investigation to a conclusion and EA16-002 should be closed.