

May 9, 2019

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

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

Reference: NEF0102dp; DP18-004

Dear Mr. Yon:

Per agreement with your Office, FCA US LLC (“FCA US”) provides herewith its responses to Request Nos. 1 through 4 of the March 8, 2019 Information Request issued in connection with the above-referenced Defect Petition. As you will see, FCA US has organized its response to these Requests in two attachments corresponding to weld- and steering-related concerns, respectively. Enclosed is the partial response to those aspects of Request Nos. 1 through 4 pertaining to steering-related concerns.

Sincerely,



Thomas McCarthy
Head, Vehicle Safety Compliance and Product Analysis

Enclosure
cc. Kerry Kolodziej, Chief Counsel’s Office

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 Request, this document contains information up to March 8, 2019, the date this Information Request (“IR”) was received.

This attachment contains FCA US’ partial response to the IR issued in Investigation DP18-004, as clarified via email with Scott Yon of the National Highway Traffic Safety Administration’s (“NHTSA”) Office of Defects Investigation (“ODI”) on March 19 and March 26, 2019.

As agreed, FCA US’ responses will be provided as follows:

- Request No. 1: Response is provided herein
- Request No. 2: Response is provided herein
- Request No. 3: Response is provided herein
- Request No. 4: Response is provided herein
- Request No. 5: Response will be provided May 31, 2019
- Request No. 6: Response will be provided May 31, 2019
- Request No. 7: Response will be provided May 31, 2019
- Request No. 8: Response will be provided May 31, 2019
- Request No. 9: Response will be provided May 31, 2019
- Request No. 10: Response will be provided May 31, 2019

After close review, FCA US notes that the “Alleged Defect” defined in this IR describes what are actually two distinct alleged defects. The first pertains to various alleged weld-related concerns impacting the frame, suspension or steering systems of the Subject Vehicles. These are described more fully in Parts 1, 2, 3(e) and 4 of the IR’s definition of the Alleged Defect. The second category relates to alleged concerns involving the Subject Vehicles’ steering system that are described in more detail in Parts 3(a) through 3(d) of the Alleged Defect definition.

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ATTACHMENT-STEERING

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Given the distinction between these two categories of issues, FCA US has organized its response in two attachments corresponding to weld- and steering-related concerns, respectively. This Attachment, titled "ATTACHMENT-STEERING," contains FCA US' Responses as they relate to any steering system issues encompassed by the relevant Parts of the Alleged Defect definition, and as further clarified below. A separate and concurrently submitted Attachment, titled "ATTACHMENT-WELD," contains FCA US' responses related to the defined weld-related issues, also as clarified below. As such, FCA US provides below two separate responses to Request No. 2, two separate Access databases responsive to Request No. 3, and two separate document submissions in response to Request No. 4. FCA US' responses to Request Nos. 5 through 10 will follow in the timeframe specified above.

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. Model Year;
- c. Date of manufacture of the vehicle
- d. Serial number of the frame/chassis;
- e. Date of manufacture of the frame/chassis;
- f. Date warranty coverage commenced;
- g. The sales codes the vehicle is equipped with; and
- h. The State in the United States where the vehicle was originally sold or leased (or delivered for sale or lease).

Provide the table in Microsoft Access 2010, or a compatible format, entitled "PRODUCTION DATA." Also include a decode description of each sales code.

A1. FCA US refers to and incorporates herein its response to Request No. 1 as set forth in its WELD response.

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. FCA US has conducted a reasonable and diligent search of the normal repositories of information potentially responsive to this request. FCA US has identified a total of 4,573 reports which relate to, or may relate to, sub-parts (a) through (d) of Alleged Defect 3. These 4,573 reports represent 3,255 unique VINs. The total reflected in sub-parts (a), (b), (e) and (f) below make up the total number of reports identified (4,573). FCA US notes that sub-parts (a) through (f) are not cumulative.

- a. FCA US identified 3,585 consumer complaints involving 2,791 unique VINs that relate to, or may relate to, sub-parts (a) through (d) of Alleged Defect 3.
 - b. FCA US identified 907 field reports involving 764 unique VINs that relate to, or may relate to, sub-parts (a) through (d) of Alleged Defect 3.
 - c. FCA US identified 15 reports involving a crash representing nine unique incidents, six reported injuries representing only five specific cases and zero reported fatalities, which relate to, or may relate to, sub-parts (a) through (d) of Alleged Defect 3.
 - d. FCA US identified 11 records of property damage claims representing eight unique incidents that relate to, or may relate to, sub-parts (a) through (d) of Alleged Defect 3.
 - e. FCA US identified 18 records of third-party arbitration proceedings where FCA US is or was a party to the arbitration that relates to, or may relate to, sub-parts (a) through (d) of Alleged Defect 3.
 - f. FCA US identified zero lawsuits and 63 legal claims, both pending and closed, in which FCA US is or was a defendant or codefendant that relate to, or may relate to, sub-parts (a) through (d) of Alleged Defect 3.
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 model year;
 - f. Vehicle's mileage at time of incident;
 - g. Incident date;
 - h. Report or claim date;
 - i. Applicable alleged defect item number(s) and sub category(ies) (e.g., 1d, 1e, and 3c for a vehicle with allegations of off-seam welds, incomplete welds and steering wobble);
 - j. Whether a crash is alleged;
 - k. Whether property damage is alleged;
 - l. Number of alleged injuries, if any; and
 - m. Number of alleged fatalities, if any.

Provide this information in Microsoft Access 2010, or a compatible format, entitled "REQUEST NUMBER TWO DATA."
- A3. FCA US' responses to subparts (a) through (m) are located in **ENCLOSURE 03** titled DP18-004_REQUEST NUMBER TWO DATA_STEERING.accdb. The information included in response to subpart (i) in **ENCLOSURE 03** reflects the alleged defect as described in sub-parts (a) through (d) of Alleged Defect 3.
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 information potentially responsive to this request. Documents related to each item within the scope of Request No. 2 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 IR. The keyword search criteria used in this search are included in Table 1, which is located in **ENCLOSURE 04** and titled DP18-004_Table 1 – Keyword Search Criteria_Steering.pdf. An eyes-on review of the search result was then conducted to determine whether each returned record relates to, or may relate to, the sub-parts (a) through (d) of Alleged Defect 3.

Copies of the available documents related to each item within the scope of Request No. 2 can be found in **ENCLOSURE 04**, which contains folders with copies of the available consumer complaints, field reports, legal claims and legal summaries. The customer complaint summaries are submitted in a file titled DP18-004_Consumer and Customer Complaints_Steering.pdf and the related documents are arranged in folders by complaint number. Legal summaries and associated backup are arranged in folders by claimant name. Field reports are submitted in file titled DP18-004_Field Reports_Steering.pdf.