



May 30, 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:

On May 9, 2019, FCA US LLC ("FCA US") provided its responses to Request Nos. 1 through 4 of the March 8, 2019 Information Request issued in connection with the above-referenced Defect Petition. Per prior agreement with your Office, today FCA US is submitting its complete responses to that Information Request.

As with its prior submission, FCA US has organized its responses to these Requests into two attachments, corresponding to weld- and steering-related concerns, respectively. Enclosed herewith is the response to the weld-related aspects of the Information Request.

Sincerely,

A handwritten signature in blue ink, appearing to read "T. McCarthy", is positioned above the typed name and title.

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’ 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, March 26, and May 20, 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.

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. As such, FCA US previously provided 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. Similarly, FCA US provides herewith two separate attachments incorporating its complete responses to the IR, including its responses to Request Nos. 5 through 10, as they relate to weld- and steering-specific concerns. This Attachment, titled “ATTACHMENT-WELD,” contains FCA US’ Responses as they relate to any weld-specific issues encompassed by the relevant Parts of the Alleged Defect definition, and as further clarified below. A separate and concurrently submitted Attachment, titled “ATTACHMENT-STEERING,” contains FCA US’ responses related to the defined steering system issues, also as clarified below.

Additionally, FCA US’ responses include the following agreed-upon clarifications:

- Alleged Defect 1 relates to the frame purchased from Tower International (“Tower”) only; it does not include any other components defined as Chassis by FCA US.
 - Alleged Defect 2 relates only to weld attachments on the frame through which suspension components attach; it does not include any other components defined as Chassis by FCA US.
 - Sub-part (e) of Alleged Defect 3 relates only to weld attachments on the frame through which steering components attach; it does not include any other components defined as Chassis by FCA US.
 - Alleged Defect 4 encompasses allegations that a frame weld was the cause of, or played a part in, the vehicle collision. This will include any complaints or reports that allege the frame structure exacerbated negative effects produced by the crash (i.e., reduced crashworthiness), or caused or contributed to a crash.
 - The access database that FCA US is providing in response to sub-part (g) of Request No. 1 will include a list of the sales codes applicable to each VIN in a column labeled “Sales Codes.”
 - Request No. 5 relates only to the frame assembly purchased from Tower; it does not include any other components defined as Chassis by FCA US. FCA US will provide information by part number and applicable Labor Operation (“LOP”) number.
 - In response to Request No. 8, FCA US will provide only: certain presentations dealing with Investigation #24349 leading to Recall 18V-675; a chronology summarizing the status of open Investigation #37424; and any other similar assessment, analysis, etc. related to Sub-part (e) of Alleged Defect 3.
 - Request No. 9 relates only to the frame assembly purchased from Tower; it does not include any other components defined as Chassis by FCA US. In addition, FCA US was requested to provide permanent corrective action information for Recall 18V-675.
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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. 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' response to Request Nos. 1(a) through (c) and (f) through (h) is located in **ENCLOSURE 01** and titled DP18-004_PRODUCTION DATA.accdb. FCA US' response to Request Nos. 1(d) and (e) is located in **ENCLOSURE 01** and titled DP18-004_Frame Serial Number and Date of Manufacture.pdf, and represents frame serial number and date of manufacture data as provided to FCA US by Tower. A file containing a listing of the relevant sales codes and descriptions, as requested by NHTSA, is provided in **ENCLOSURE 01** and titled DP18-004_2018-2019 JL SALES CODES.pdf.

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 173 reports which relate to, or may relate to, the Alleged Defect 1, 2, sub-part (e) of Alleged Defect 3, or Alleged Defect 4. These 173

reports represent 131 unique VINs. The total reflected in sub-parts (a), (b), (e) and (f) below make up the total number of reports identified (173). FCA US notes that sub-parts (a) through (f) are not cumulative.

- a. FCA US identified 101 consumer complaints that relate to, or may relate to, Alleged Defect 1, 2, sub-part (e) of Alleged Defect 3, or Alleged Defect 4.
- b. FCA US identified 69 field reports that relate to, or may relate to, Alleged Defect 1, 2, sub-part (e) of Alleged Defect 3, or Alleged Defect 4.
- c. FCA US identified zero reports involving a crash, zero reported injuries and zero reported fatalities, which relate to, or may relate to, Alleged Defect 1, 2, sub-part (e) of Alleged Defect 3, or Alleged Defect 4.
- d. FCA US identified zero records of property damage claims that relate to, or may relate to, Alleged Defect 1, 2, sub-part (e) of Alleged Defect 3, or Alleged Defect 4.
- e. FCA US identified zero records of third-party arbitration proceedings where FCA US is or was a party to the arbitration that relates to, or may relate to, Alleged Defect 1, 2, sub-part (e) of Alleged Defect 3, or Alleged Defect 4.
- f. FCA US identified zero lawsuits and three legal claims, both pending and closed, in which FCA US is or was a defendant or codefendant that relate to, or may relate to, Alleged Defect 1, 2, sub-part (e) of Alleged Defect 3, or Alleged Defect 4.

In relation to the six reports provided by FCA US which relate to, or may relate to, Alleged Defect 1(f), FCA US has no information indicating that any alleged weld defect resulted in sub-standard structural integrity.

FCA US has identified additional reports involving generalized and/or unspecified weld concerns, many of which are related to Recall 18V-675. These additional reports contain no indication of the presence of the concerns defined in Alleged Defect 1, 2, sub-part (e) of Alleged Defect 3, or Alleged Defect 4 and thus are not included in this submission.

- 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_WELD.accdb. The information included in response to subpart (i) in **ENCLOSURE 03** reflects the alleged defect as described in Alleged Defect 1, 2, sub-part (e) of Alleged Defect 3, and Alleged Defect 4.

All reports identified as Alleged Defect 1(g) in response to Request 3(i) are comprised of reports also identified as either Alleged Defect 2 or sub-part (e) 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_Weld.pdf. An eyes-on review of the search result was then conducted to determine whether each returned record relates to, or may relate to, Alleged Defect 1, 2, sub-part (e) of Alleged Defect 3, or Alleged Defect 4.

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_Weld.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_Weld.pdf.

- 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) and their associated module;
- 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."

- A5. FCA US' responses to subparts (a) through (n) as it relates to the frame purchased from Tower are located in **ENCLOSURE 05** and titled DP18-004 WARRANTY DATA.accdb. FCA US notes that Diagnostic Trouble Code ("DTC") information is not normally captured as part of the warranty system record for any particular claim. While these codes occasionally may be available if the technician manually enters them into the narrative field in the relevant database, technicians are not required to do so, and as such DTC information cannot be extracted 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, module names and brief description of module control domain 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). Describe any extended warranty coverage option(s) that FCA offered for the subject vehicles and state by option, model, and model year, the number of vehicles that are covered under each such extended warranty.

- A6. In order to identify the claims detailed in the response to Request No. 5, FCA US searched the normal repositories of information potentially responsive to this request. In conducting this search, FCA US utilized LOPs it identified as being potentially relevant to this IR, including LOPs associated with the frame purchased from Tower. The associated LOPs are located in **ENCLOSURE 06** and titled Table 2 - LOPs.pdf. All claims returned utilizing these LOPs were then searched using keywords. The keyword search criteria can be found in **ENCLOSURE 04** and titled DP18-004_Table 1 – Keyword Search

Criteria_Weld.pdf. An eyes-on review of the search result was then conducted to determine whether each returned record relates to, or may relate to, Alleged Defect 1, 2, sub-part (e) of Alleged Defect 3, or Alleged Defect 4. FCA US also undertook a similar search utilizing all potentially applicable frame part numbers; that search did not return any responsive warranty claims.

FCA US' response to Request No. 5 does not include any claims paid under Recall 18V-675. However, in an abundance of caution, FCA US has included in its response certain claims paid under Recall 18V-675 that fell outside the parameters of that campaign.

Labor operations, labor operation descriptions, problem codes, problem code descriptions, DTCs, DTC descriptions, part numbers and part number descriptions potentially related to Alleged Defect 1, 2, sub-part (e) of Alleged Defect 3, or Alleged Defect 4 are contained in the correspondingly titled columns in the database located in **ENCLOSURE 05** and titled DP18-004 WARRANTY DATA.accdb.

New vehicle warranty coverage offered by FCA US on the subject vehicles equipped with a gas engine is basic limited warranty, 3 years/36,000 miles, powertrain limited warranty 5 years/60,000 miles, and corrosion limited warranty for outer panels 5 years/100,000 miles and roadside assistance 5 years/60,000 miles.

A table that contains extended warranty and service contract coverage option(s) that FCA US offered for the subject vehicles is located in **ENCLOSURE 06** and titled DP18-004 Service Contracts_CONF BUS INFO.pdf. The count for extended warranties purchased on the subject vehicles can also be found within this document.

- 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 has conducted a reasonable and diligent search of the normal repositories of information potentially responsive to this request. FCA US' response to Request No. 7 is located in **ENCLOSURE 07** and contains the records identified through this search that relate to, or may relate to, Alleged Defect 1, 2, sub-part (e) of Alleged Defect 3, or Alleged Defect 4. Information related to Recall 18V-675 is not included in FCA US' response to Request No. 7.
- 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 or in conjunction with the component supplier or other party. Include all actions related to the track bar bracket weld defect described in the NHTSA recall 18V-675 defect statement. 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.

A8. FCA US's responses to subparts (a) through (f), as clarified above, are located in **ENCLOSURE 08** and are summarized in the chart titled DP18-004 Actions Summary_WELD_CONF BUS INFO.pdf. Copies of responsive documentary information, including but not limited to information relating to Investigation #37424 and Investigation #24349, are included within **ENCLOSURE 08**.

9. **Describe all modifications or changes made by, or on behalf of, FCA or in conjunction with the component supplier or other party, 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. FCA US' responses to subparts (a) through (h) as it relates to the frame purchased from Tower are located in **ENCLOSURE 09** and titled DP18-004 Change History_CONF BUS INFO.pdf, and DP18-004 Frame Part Number Matrix.pdf. A permanent corrective action summary document relating to Recall 18V-675 also is located in **ENCLOSURE 09**.

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

- a. **The causal or contributory factor(s);**
- b. **The failure mechanism(s);**
- c. **The failure mode(s);**
- d. **The risk to motor vehicle safety that it poses; and**
- e. **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;**
- f. **The effectiveness of each action taken to address an alleged defect; and**
- g. **The reports included with this inquiry.**

A10. FCA US has reviewed the data provided in response to the Requests above and the VOQs provided by NHTSA in conjunction with this Information Request. As detailed below, other than the issue identified in Recall 18V-675, none of that data leads FCA US to conclude that there is an unreasonable risk to motor vehicle safety with respect to any of the weld-related issues that are the subject of this Information Request.

Most importantly, FCA US' conclusion that there is no safety concern is supported and confirmed by the fact that there are no reported crashes, injuries, fatalities or property damage claims associated with any of the weld-related complaints identified in FCA US' databases or in the VOQs.

With respect to any weld-related incidents involving alleged separation or disconnection, including those symptomatic of Alleged Defects 1(g), 2, 3(e) and 4, FCA US refers to its assessment related to the track bar attachment contained in the Defect Information Report associated with NHTSA Recall 18V-675, submitted by FCA US on September 28, 2018. As FCA US described in that Report, the front track bar bracket weld may be out-of-specification on certain 2018-2019 MY Jeep Wrangler left hand drive vehicles, which could potentially result in the bracket separating from the frame. The separation of the front track bar bracket from the frame may cause a reduction in steering response, which can cause vehicle crash without prior warning. Prior to complete separation of the bracket from the frame, the customer may experience a front end noise, an off-center steering wheel position, a "Service Electronic Stability Control" message and/or illumination of the Electronic Stability Control telltale in the cluster. While FCA US noted a handful of other separation events that fell outside the scope of Recall 18V-675, its review of the data provided in response to this Information Request, and in the referenced VOQs, has identified no additional safety-related trends involving separation beyond that already identified in connection with Recall 18V-675.

FCA US has reached a similar conclusion related to the balance of the weld-related Alleged Defects, including those described in subparts (a) through (f) of Alleged Defect 1. The substance of the complaints within FCA US' databases on these issues appears to center on the visual appearance of the welds (including what customers perceive as rust) and/or generalized concerns regarding the perceived quality of welds. Unspecified and cosmetic concerns of this sort are an expected phenomenon in any recall; consumers, having learned of the recall, become concerned that their vehicle may exhibit the same concerns leading to the recall, even if their vehicle is not in the recall population. Further, some of the events were unconfirmed reports involving vehicles that had not been brought to dealerships for inspection. FCA US notes that it has an open investigation into complaints of track bar weld porosity, though no issues impacting motor vehicle safety have been identified as of this date. See information related to Investigation #37424, described in FCA US'

response to Request No. 8. However, FCA US' review of this internal data reveals no additional safety concern beyond that already identified in connection with Recall 18V-675.

In addition, FCA US has not identified any responsive reports relating to Alleged Defect 4. There is no evidence in its records that a frame weld was the cause of, or played a part in, any vehicle collision. Nor are there any identified reports that allege the frame structure exacerbated any negative effects caused by a crash.

Finally, FCA US also has reviewed the VOQs provided by NHTSA with this Request. Based on that review, FCA US has determined that the issues described in those VOQs are representative of those reflected in its own complaint databases. Of the universe of VOQs provided by NHTSA, FCA US identified just four incidents involving any allegation of weld separation: ODI Nos. 11115137, 11119650, 11129667 and 11179954. All four of the vehicles in those incidents were within Recall 18V-675 population and have since been remedied. The analysis and conclusions leading to Recall 18V-675 are thus fully consistent with the relevant VOQs. The balance of the weld-related VOQs reflect the same pattern of concerns shown in FCA US' own data, including a number of unverified cosmetic observations or other perceived quality concerns with the welds. There is no evidence to suggest that any of those incidents present an unreasonable risk to motor vehicle safety.

Based on this assessment, and its comprehensive review of the relevant records described above, FCA US concludes that those weld concerns unrelated to the track bar bracket do not pose an unreasonable risk to motor vehicle safety. And, as discussed above, those concerns related to the track bar bracket already have been addressed in Recall 18V-675. As such, the Agency should close this investigation.