



April 24, 2019

Jeff Quandt
Office of Defects Investigation
National Highway Traffic Safety Administration
W48-312, NEF-104
1200 New Jersey Avenue, SE
Washington, DC 20590

Dear Mr. Quandt:

Subject: **Jaguar Land Rover Response to EA18-004**

Attached please find Jaguar Land Rover's response to EA18-004. The response does not contain any Confidential Business Information.

Jaguar Land Rover will respond to Questions 7, 9 and 10 by May 15, 2019. We appreciate the Agency granting our extension request to complete these items.

Please call me at 201-818-8034 if you have any questions.

Sincerely,

Digitally signed by John Kobylarz
Date: 2019.04.24 11:38:05 -04'00'

John Kobylarz
Safety Compliance Manager
Jaguar Land Rover North America, LLC

Attachment

JAGUAR LAND ROVER RESPONSE TO EA18-004

This is Jaguar Land Rover's response to the Engineering Analysis request EA18-004. The enquiry letter requests Jaguar Land Rover to investigate allegations of door latch failures resulting in incidents of doors opening while driving in certain Range Rover and Range Rover Sport vehicles manufactured by Jaguar Land Rover. For the investigation, we have considered all received reports from the USA alleging or reporting door latch failures resulting in incidents of doors opening. Given the further reports received relating to door open while in motion, there is an ongoing investigation into these reports to determine if there are further defects present not determined during the course of the investigation which lead to recall reference P068, NHTSA ref. 15V-385. These ongoing investigations have yet to reach any determination. For the purpose of transparency, this aspect is mentioned here to ensure NHTSA are provided with related information. For the purposes of this response, research has focused on the door latch mechanism. Documents submitted in support of this response may mention other parts of the door closure mechanism and/or other vehicle systems.

Where supporting evidence is supplied to answer a specific question, this is provided in appendices aligned to the specific question being responded to. If the same evidence supports two or more question responses, it will be duplicated in the corresponding appendices, to aid clarity for the reader in understanding the response.

Jaguar Land Rover's response to this Recall Query information request was prepared pursuant to a diligent search for the information requested.

The scope of Jaguar Land Rover's investigation conducted to locate responsive information focused on Jaguar Land Rover employees most likely to be knowledgeable about the subject matter of this inquiry and on review of Jaguar Land Rover files in which responsive information ordinarily would be expected to be found and to which Jaguar Land Rover ordinarily would refer. Jaguar Land Rover notes that although electronic information was included within the scope of its search, Jaguar Land Rover has not attempted to retrieve from computer storage electronic files that were overwritten or deleted. As the agency is aware, such files generally are unavailable to the computer user even if they still exist and are retrievable through expert means. To the extent that the agency's definition of Jaguar Land Rover includes suppliers, contractors and affiliated enterprises for which Jaguar Land Rover does not exercise day-to-day operational control, we note that information belonging to such entities ordinarily is not in Jaguar Land Rover's possession, custody or control.

Jaguar Land Rover has construed this request as pertaining to vehicles manufactured for sale in the United States and federalized territories.

Jaguar Land Rover notes that some of the information being produced pursuant to this inquiry may contain personal information such as customer names, addresses, telephone numbers, and complete Vehicle Identification Numbers (VINs). Jaguar Land Rover is producing such personal information in an unredacted form to facilitate the agency's investigation with the understanding that the agency will not make such personal information available to the public under FOIA Exemption, 5 U.S.C. 552(b)(4).

Answers to your specific questions are set forth below. As requested, after each numeric designation, we have set forth verbatim the request for information, followed by our response. Unless otherwise stated, Jaguar Land Rover has undertaken to provide responsive documents dated up to and including March 6, 2019, the date of your inquiry. Jaguar Land Rover has searched within the following Jaguar Land Rover offices for responsive documents: Automotive Safety & Compliance Office, Purchasing, Marketing

Sales and Service, Quality, Office of the General Counsel, Vehicle Operations, and Product Engineering.

Question 1

State, by model, model year and entry system, the number of subject vehicles JLR has manufactured for sale or lease in the United States. Separately, for each subject vehicle manufactured to date by JLR, state the following:

- a. Vehicle identification number (VIN);
- b. Make;
- c. Model;
- d. Model Year;
- e. Entry system (e.g., KV entry system);
- f. Remote Function Actuator (RFA) software version (as sold);
- g. Date of manufacture;
- h. Date warranty coverage commenced;
- i. Whether the vehicle was within the scope of the subject recall (yes/no);
- j. The date the subject recall remedy was completed, if applicable (completion date/not completed/not applicable); 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 "EA18-004 PRODUCTION DATA."

Response 1

Jaguar Land Rover records indicate that the approximate total number of vehicles through August 15, 2017 manufactured for sale in the United States (the 50 states and the District of Columbia) and its protectorates and territories (American Samoa, Guam, Northern Mariana Islands, Puerto Rico, and Virgin Islands) is seventy five thousand, one hundred and ninety four (78,194) Range Rover and eighty nine thousand, two hundred and ninety eight (89,298) Range Rover Sport vehicles.

The data tabulated below covers Jaguar Land Rover vehicles built for sale in the United States (the 50 states and the District of Columbia) and its protectorates and territories (American Samoa, Guam, Northern Mariana Islands, Puerto Rico, and Virgin Islands), broken down by model and model year.

Model	Model Year	Number of Vehicles
RANGE ROVER L405	2013	5,350
RANGE ROVER L405	2014	18,827
RANGE ROVER L405	2015	13,098
RANGE ROVER L405	2016	23,865

RANGE ROVER L405	2017	17,054
RANGE ROVER SPORT L494	2014	23,550
RANGE ROVER SPORT L494	2015	16,025
RANGE ROVER SPORT L494	2016	30,590
RANGE ROVER SPORT L494	2017	19,133

1) a to k

Appendix Q1 includes an Excel spreadsheet (filename: EA18-004 PRODUCTION DATA) which lists the requested vehicle information for each subject vehicle.

Responses to subparts a, b, c, d, e, f, g, h, i and k are shown on tab 1 (1a – k not j)

Responses to subpart j are shown on tab 2 (1j – claims). This tab lists all claims processed relating to the Jaguar Land Rover recall reference P068.

Question 2

State, by model, model year and entry system, the number of each of the following, received by JLR, or of which JLR 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 JLR is or was a party to the arbitration; and
- f. Lawsuits, both pending and closed, in which JLR 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 "detailed" description of the alleged problem and causal and contributing factors and JLR'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.

Response 2

Jaguar Land Rover is providing information in response to this as follows:

2 a

The total number Consumer complaints, including those from fleet operators is thirteen (13).

Noted that within the data collected from the respective computer system in which the data is located, dealer technical support hotline reports and customer complaint data is treated, from an output, as one source system.

2 b

The total number of Field reports, including dealer field reports is one hundred and forty nine (149).

2 c

The number of 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 vehicle property damage claims, consumer complaints or field reports is zero (0).

2 d

The number of property damage claims (as defined by 49 CFR 579.4) is two (2).

From field report reference 684452451, VIN SALWR2TF5EA [REDACTED] Range Rover Sport 14MY, fitted with latch type 'Passive Entry/Push Button Start':

The door opened into a pole causing damage to door.

Jaguar Land Rover diagnosis was that this was a 'pre-P068 recall' failure, i.e. it occurred before the P068 recall remedy could be applied.

The latch was replaced, with no further analysis.

Jaguar Land Rover's understanding is that the underlying cause is most likely to have been one of the causes identified in and being mitigated by the application of P068:

- i) Jamming of the keyless vehicle (KV) release cord, AND/OR
- ii) Corrosion of the KV motor shaft and sintered bearing due to a water leak path past one of the casing rivets.
- iii) Short circuit instead of open circuit applied to the latch release motor after actuation

This report was previously provided in response to RQ17-005.

From field report reference 2033998, VIN SALGS2VF7FA [REDACTED] Range Rover 15MY, fitted with latch type 'Passive Entry/Push Button Start':

The left rear door opened as the vehicle was being driven into a garage and the door hit a wall, a passenger had just exited the vehicle via the left rear door prior to the incident. It was reported that the door did eventually latch.

Jaguar Land Rover diagnosis was that this was a post P068 recall failure. The latch operation was assessed by the repairing retailer, where no fault with the operation was found.

The latch was replaced with no further analysis.

2 e

The number of third-party arbitration proceedings where Jaguar Land Rover is or was a party to the arbitration is zero (0).

2 f

The number of Lawsuits, both pending and closed, in which Jaguar Land Rover is or was a defendant or codefendant is zero (0).

There are zero (0) reports involving a crash, injury or fatality, third-party arbitration proceedings or lawsuits and therefore there is no information from which to provide any detailed description of the alleged problem and causal and contributing factors and Jaguar Land Rover's assessment of the problem, with a summary of the significant underlying facts and evidence.

The two (2) reports of property damage are explained above in the response to question 2) d.

Question 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. JLR'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;
- l. Number of alleged fatalities, if any;
- m. Door position (left front, right front, left rear, right rear, unknown);
- n. JLR's assessment of the failure mode alleged (unlatched in motion, partial unlatch in motion, failure to latch); and
- p. Repair performed (if known)

Provide this information in Microsoft Access 2010, or a compatible format, entitled EA18-004 REQUEST NUMBER THREE DATA- SUBJECT VEHICLES and EA18- 004 REQUEST NUMBER THREE DATA - PEER VEHICLES.

Response 3

Appendix Q3 (filenames: EA18-004 REQUEST NUMBER THREE DATA - SUBJECT VEHICLES, EA18- 004 REQUEST NUMBER THREE DATA - PEER VEHICLES and EA18-004 CUSTOMER DATA) includes the requested vehicle information for each responsive report.

Question 4

Produce copies of all documents related to each item within the scope of Request No. 2. Organize the documents separately for the subject and peer vehicles and by category (i.e., consumer complaints, field reports, etc.) and describe the method JLR used for organizing the documents. Describe in detail the search methods and search criteria used by JLR to identify the items in response to Request No .2.

Response 4

Appendix Q4 [file name: ECI Reports SUBJECT VEHICLES] and [file name: ECI Reports PEER VEHICLES] includes copies of all reports relating to the vehicles identified in the response to Q2 of this request. These reports were generated within the Jaguar Land Rover CDR-ECI and GCM systems, which are Jaguar Land Rover's systems used to gather and analyze vehicle data (including Consumer Complaints and Field Reports), in order to meet TREAD Act Early Warning Reporting obligations. Data from Consumer Affairs and Dealer Technical Support Hotline is routed into the CDR-ECI and GCM systems.

The files in the ECI Reports are divided into two sub-folders – 'Field Reports' and 'Customer Complaints'. All reports are named using the ECI report number for each. Where a vehicle has more than one dealer report, the ECI report number is followed by a suffix, ('a', 'b', 'c', etc).

The CDR and GCM searches were carried out, to establish all potential cases which might involve door latch mechanism malfunction. This was carried out within the Jaguar Land Rover CDR-ECI and GCM systems, using the symptoms:

function-closes-will not stay up/open; function-false activation/cycle/deploy; function-malfunction/inoperative; latching-does not latch/close; latching-does not release/open; latching-unlatch/latch opens; misaligned/out of position/adjustment/poor fit;

The reports were then searched, using keyword list:

Door: open: close; sling; swing; swung; flung; fell; fall; unexpected; latch; lock; handle; shut; without; warning; passenger; driver; front; rear; stay; driving; P068; recall; customer; states; concern.

The customer comments were considered against the 'unlatching or partial unlatching of one or more door latches while driving' claim criteria and where additional dealer comments were present, these were also considered. Door latch malfunction criteria as defined by NHTSA is as follows:

Alleged defect: Allegations of any one or more of the following conditions:

1. Complete unlatching of one or more door latches while driving;
2. Partial unlatching of one or more door latches while driving (i.e., secondary latch remains engaged); or
3. Door will not latch when closed.

The cases responsive to these criteria were included in the submission.

Question 5

State, by model , model year and entry system, total counts for all of the following categories of claims, collectively, that have been paid by JLR to date that relate to, or may relate to, the alleged defect in the subject and peer 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. JLR'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. Replacement part number(s) and description(s);
- k. Cause as stated on the repair order
- l. Correction as stated on the repair order
- m. Additional comments, if any, by the dealer/technician relating to the claim and/or repair;
- n. Door Position (left front, right front, left rear, right rear, unknown); and
- o. JLR assessment of the failure mode (unlatched in motion, partial unlatch in motion, failure to latch).

Provide this information separately for the subject and peer vehicles in Microsoft Access 2010, or a compatible format, entitled "WARRANTY DATA - SUBJECT VEHICLES" and "WARRANTY DATA - PEER VEHICLES"

Describe in detail the search methods and search criteria used by JLR to identify the claims in response to Request No. 5, including the labor operations, problem codes, part numbers and any other parameters used. Provide a list of all labor operations, labor operation descriptions, problem codes, problem code descriptions applicable to the alleged defect in the subject vehicles. State, by make and model year, the terms of the new vehicle warranty coverage offered by JLR 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 JLR 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.

Response 5

Records identified in a search of the Jaguar Land Rover Analytical Warranty System (AWS) database, were reviewed for relevance and are contained in Appendix Q5, (file names: EA18-004 WARRANTY DATA - SUBJECT VEHICLES, EA18-004 WARRANTY DATA - PEER VEHICLES and EA18-004 CUSTOMER DATA).

Certain vehicles may have experienced more than one incident and have more than one claim associated with their VINs. These claims have been counted separately.

Requests for "goodwill, field or zone adjustments" received by Jaguar Land Rover to date that relate to the alleged defect that were not honored, if any, would be included in the owner reports identified above in response to Request 2. Such claims that were honored are included in the warranty data provided.

Appendix Q5 includes the search criteria in the subject vehicles (file name: Jaguar Land Rover AWS search methodology), problem operation codes (file name: Problem codes) and descriptions of the available new vehicle and extended warranty programs (file names: New and Extended Warranty, Warranty Coverage Terms and Conditions).

The data tabulated below covers Jaguar Land Rover vehicles with extended warranty coverage:

Model	Model Year	Number of Vehicles
RANGE ROVER L405	2013	937
RANGE ROVER L405	2014	2747
RANGE ROVER L405	2015	2210
RANGE ROVER L405	2016	2773
RANGE ROVER L405	2017	1101
RANGE ROVER SPORT L494	2014	4131
RANGE ROVER SPORT L494	2015	3457
RANGE ROVER SPORT L494	2016	3710
RANGE ROVER SPORT L494	2017	1440

The data reviewed as responsive in this EA request is based on the same search conditions as those provided in the response to RQ17-005. The data submitted in response to the RQ included records which did not meet the definition of the alleged defect as provided in the RQ. The RQ response provided significantly more line items of data and included information concerning unrelated (to the alleged defect) condition.

The file provided in response to this EA contains only those reports which are or could reasonably construed to be responsive based on the definition of the alleged defect as provided.

Question 6

Produce copies of all service, warranty and other documents that relate to, or may relate to, the alleged defect in the subject vehicles, that JLR 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 JLR is planning to issue within the next 120 days.

Response 6

For purposes of identifying communications to dealers, zone offices, or field offices pertaining, at least in part, to the alleged defect in the subject vehicles, Jaguar Land Rover has reviewed the Jaguar Land Rover Technical and Owner Publications Information Exchange (TOPIx) website, which is the general repository for all workshop manuals, technical service, and recall communications. In addition, the EPQR database was searched for Special Service Messages. We assume this request does not seek information related to electronic communications to Land Rover dealers regarding the order, delivery, or payment for replacement parts, so we have not included these kinds of information in our answer.

Appendix Q6 includes copies of all service, warranty and other documents that relate to, or may relate to, the alleged defect in the subject vehicles, that JLR has issued to any dealers, regional or zone offices, field offices, fleet purchasers, or other entities.

Question 7

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, JLR. 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. 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 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.

Response 7

Response to be provided by May 15, 2019.

Question 8

State the number of door latch assemblies that JLR has sold that may be used in the subject or peer vehicles by component name, part number (both service and engineering/ production), model and model year of the vehicle in which it is used, and month/year of sale (including the cutoff date for sales, if applicable).

For each component part number, provide the supplier's name, address, and appropriate point of contact (name, title, and telephone number). Also identify by make,

model and model year, any other vehicles of which JLR is aware that contain the identical component, whether installed in production or in service, and state the applicable dates of production or service usage.

Response 8

Appendix Q8 (file name: EA18-004 Parts Sales data) contains the number of sales for components that may be used in the subject or peer vehicles, any other vehicles of which JLR is aware that contain the identical component and supplier details.

Question 9

Provide a spreadsheet listing of all subject door latch parts returned for analysis by, or for, JLR. Include the following information for all such returns:

- a. The vehicle identification number (VIN);
- b. All related complaint, field report, or claim identification numbers;
- c. Door position;
- d. A summary of the customer concern;
- e. JLR's assessment of the failure mode;
- f. The status of the part analysis (incomplete, complete);
- g. A summary of the results of the part analysis; and
- h. JLR's assessment of the cause of the failure.

In addition, provide copies of all reports, photographs and videos related to return part analyses organized by vehicle identification number.

Response 9

Response to be provided by May 15, 2019.

Question 10

Furnish JLR's assessments of the alleged defect in each subgroup of the subject vehicles. Include the following information in each assessment:

- a. Pareto charts of the root causes;
- b. A breakdown of the failure mode counts for each root cause condition;
- c. The risk to motor vehicle safety for the three most frequently occurring root causes identified;
- d. 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
- e. The VOQ reports referenced in this inquiry.

Response 10

Response to be provided by May 15, 2019.