

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”).

This attachment contains FCA US’ response to the Information Request issued in Investigation PE18-016, as clarified via email with Scott Yon and Joseph Oxenham of the National Highway Traffic Safety Administration’s (“NHTSA”) Office of Defects Investigation (“ODI”), dated March 19, 2019 and March 22, 2019. The email correspondence with NHTSA included the following three agreed-upon clarifications:

1. The defined term “Alleged Peer Vehicle Defect” includes only allegations of separation or fracture of steering components for the following vehicles:
 - a. Vehicles that were not included in the listed recalls; and
 - b. Vehicles included in the listed recalls for which there is an allegation of separation or fracture of steering components after completion of all relevant recalls.
2. The term “Steering Components” referenced in the definition of “Alleged Peer Vehicle Defect” includes only:
 - a. The drag link;
 - b. The drag link left inner tie rod (connection to the pitman arm);
 - c. The drag link right inner tie rod (connection to the cross car rod (tie rod)); and
 - d. The tie rod right outer tie rod (connection to the right wheel).
3. Equipment Recall 09E-001 is not relevant to this Information Request and will not be considered by FCA US in formulating its responses thereto.

Note: Unless indicated otherwise in the response to a question, this document contains information through March 15, 2019, the date this Information Request was received.

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. **Steering system design type or style (e.g. "4x4 style", "4x2 style", etc.) installed as original equipment;**
 - f. **Date of manufacture;**
 - g. **Date warranty coverage commenced; 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."

- A1. FCA US' responses to subparts (a) through (h) are located in **ENCLOSURE 01** and titled PE18_016 SUBJECT_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. 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 56 reports that relate to, or may relate to, separation of steering linkage at the drag link adjuster resulting in loss of steering

control ("Alleged Subject Vehicle Defect 1") in the subject vehicles. These 56 reports represent 48 unique VINs. The total reflected in sub-parts (a), (b), (e) and (f) below make up the total number of reports identified (56). FCA US notes that sub-parts (a) through (f) are not cumulative.

- a. FCA US identified 48 consumer complaints that relate to, or may relate to, Alleged Subject Vehicle Defect 1.
- b. FCA US identified two field reports that relate to, or may relate to, Alleged Subject Vehicle Defect 1.
- c. FCA US identified 13 reports involving a crash, with a total of two reports of the same injury, and zero reported fatalities, which relate to, or may relate to, Alleged Subject Vehicle Defect 1.
- d. FCA US identified 14 property damage claims that relate to, or may relate to, Alleged Subject Vehicle Defect 1.
- e. FCA US identified one third-party arbitration proceeding where FCA US is or was a party to the arbitration that relates to, or may relate to, Alleged Subject Vehicle Defect 1.
- f. FCA US identified zero lawsuits and five legal claims, pending or closed, in which FCA US is or was a defendant or codefendant that relate to, or may relate to, Alleged Subject Vehicle Defect 1.

Additionally, FCA US has identified a total of 400 reports that relate to, or may relate to, loosening of either or both jam nuts at the adjuster ("Alleged Subject Vehicle Defect 2") in the subject vehicles. These 400 reports represent 337 unique VINs. The total reflected in sub-parts (a), (b), (e) and (f) below make up the total number of reports identified (400). FCA US notes that sub-parts (a) through (f) are not cumulative.

- a. FCA US identified 287 consumer complaints that relate to, or may relate to, Alleged Subject Vehicle Defect 2.
- b. FCA US identified 90 field reports that relate to, or may relate to, Alleged Subject Vehicle Defect 2.
- c. FCA US identified zero reports involving a crash, with zero reported injuries and zero reported fatalities that relate to, or may relate to, Alleged Subject Vehicle Defect 2.
- d. FCA US identified zero property damage claims that relate to, or may relate to, Alleged Subject Vehicle Defect 2.
- e. FCA US identified five third-party arbitration proceedings where FCA US is or was a party to the arbitration that relates to, or may relate to, Alleged Subject Vehicle Defect 2.
- f. FCA US identified seven lawsuits and eleven legal claims, pending or closed, in which FCA US is or was a defendant or codefendant that relate to, or may relate to, Alleged Subject Vehicle Defect 2.

- 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. Alleged defect definition 1 or 2;
- h. Steering system style (4x4 or 4x2);
- i. Incident date;
- j. Report or claim date;
- k. Whether a crash is alleged;
- l. Whether property damage is alleged;
- m. Number of alleged injuries, if any; and
- n. 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 (n) are located in **ENCLOSURE 03** and titled PE18-016 SUBJECT_REQUEST NUMBER TWO DATA.accdb. In its response to subpart (g), FCA US further expanded the categorization of Alleged Subject Vehicle Defect 1 into two sub-categories: 1A – separation; 1B – possible separation; and Alleged Subject Vehicle Defect 2 into two sub-categories: 2A – loose jam nut(s); 2B – possible loose jam nut(s).

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 using criteria such as vehicle model, model year, and a word search using terms related to the items sought by this Information Request. The keyword search criteria used in this search is located in **ENCLOSURE 04** and titled Table 1 – Keyword Search Criteria.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 Subject Vehicle Defect 1 and/or Alleged Subject Vehicle Defect 2.

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, lawsuits, legal claims and legal summaries. The customer complaint summaries are submitted in file titled Consumer and Customer Complaints.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 Field Reports.pdf.

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

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

- a. Vehicle identification number (VIN);**
- b. Make;**
- c. Model;**
- d. Model Year;**
- e. Date of manufacture;**
- f. Date warranty coverage commenced;**
- g. Whether subject to NHTSA recalls 09V-005, 09E-001, 10V-657, 11V-350, 13V-529, 13V-528, and 13V-527;**
 - i. If so, whether the recall is open or closed;**
 - ii. If closed, the date the recall remedy was completed; and,**
- h. The State in the United States where the vehicle was originally sold or leased (or delivered for sale or lease).**

Provide this information in Microsoft Access 2010, or a compatible format, entitled "PEER PRODUCTION DATA."

A5. FCA US' responses to subparts (a) through (h) are located in **ENCLOSURE 05** and titled PE18- 016 PEER_PRODUCTION DATA.accdb. With respect to subpart (g) in this access database file, where there is a check in one of the columns titled "Subject to [...]," and the accompanying column titled "[...] Remedy" is blank, the recall indicated in the "Subject to" column is open as to that particular vehicle. Finally, FCA US has determined that vehicles built with cross car steering systems, including all peer vehicles, are not included in Recall 13V-528.

- 6. 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 peer vehicle defect in the peer vehicles (which have not been recalled, or are in a final remedy state for recalls relevant to the defect condition):**
 - 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.**

A6. 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 160 reports that relate to, or may relate to, separation or fracture of steering components resulting in the loss of steering ("Alleged Peer Vehicle Defect") in the peer vehicles, which represent 147 unique VINs. The total reflected in sub-parts (a), (b), (e) and (f) below make up the total number of reports (160). FCA US notes that sub-parts (a) through (f) are not cumulative.

- a. FCA US identified 153 consumer complaints that relate to, or may relate to, the Alleged Peer Vehicle Defect.
- b. FCA US identified two field reports that relate to, or may relate to, the Alleged Peer Vehicle Defect.

- c. FCA US identified twelve reports involving a crash, with two reports of the same injury, and one reported fatality that relate to, or may relate to, the Alleged Peer Vehicle Defect.
- d. FCA US identified eleven property damage claims that relate to, or may relate to, the Alleged Peer Vehicle Defect.
- e. FCA US identified zero third-party arbitration proceedings where FCA US is or was a party to the arbitration that relates to, or may relate to, the Alleged Peer Vehicle Defect.
- f. FCA US identified one lawsuit and four legal claims, both pending and closed, in which FCA US is or was a defendant or codefendant that relate to, or may relate to, the Alleged Peer Vehicle Defect.

Out of an abundance of caution, FCA US includes in its response to this request certain information regarding peer vehicle incidents that may have included complaints falling outside of the Alleged Peer Vehicle Defect, or beyond the agreed scope of the relevant peer vehicle "steering components." Specifically, of the 160 reports identified above, 107 reports involved situations in which the tie rod location could not be identified or confirmed.

- 7. Separately, for each item (complaint, report, claim, notice, or matter) within the scope of your response to Request No. 6, state the following information:**
- a. FCA's file number or other identifier used;
 - b. The category of the item, as identified in Request No. 6 (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. FCA's assessment of which component failed;
 - h. Incident date;
 - i. Report or claim date;
 - j. Whether a crash is alleged;
 - k. Whether property damage is alleged;
 - l. Number of alleged injuries, if any; and
 - m. Number of alleged fatalities, if any.

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

A7. FCA US' response to subparts (a) through (m) are located in **ENCLOSURE 07** and titled PE18-016 PEER_REQUEST NUMBER SIX DATA.accdb. The information included in response to subpart (g) in **ENCLOSURE 07** reflects the substance of the allegations made in the reports provided.

- 8. Produce copies of all documents related to each item within the scope of Request No. 7 which relate to incidents involving or alleging a crash, injury, or fatality only. 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. 7.

A8. 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. 6 were gathered by using criteria such as vehicle model, model year, and a word search using terms reasonably related to the reports sought by this Information Request. The keyword search criteria used in this search is located in **ENCLOSURE 04** and titled Table 1 – Keyword Search Criteria.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 Alleged Peer Vehicle Defect.

The copies of the available documents related to each item within the scope of Request No. 6 can be found in **ENCLOSURE 08**, which contains folders with copies of the available consumer complaints, lawsuits, 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 and associated backup are arranged in folders by claimant name.

9. 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 subject 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) including, but not limited to ESC MIL lights which may indicate steering off center;
- 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."

A9. FCA US' responses to subparts (a) through (n) are located in **ENCLOSURE 09** and titled PE18-016 SUBJECT_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.

10. Describe in detail the search methods and search criteria used by FCA to identify the claims in response to Request No. 9, 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 subject 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.

A10. In order to identify the claims detailed in the response to Request No. 9, FCA US searched the normal repositories of information potentially responsive to this request, utilizing part numbers. The part numbers, including all superseded part numbers, are located in **ENCLOSURE 10** and titled Table 2 and Table 3 - Part Numbers.pdf. All claims returned utilizing the identified part numbers were then searched using keywords. The keyword search criteria can be found in **ENCLOSURE 10** and titled Table 4 – Warranty Keyword Search Criteria.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 Alleged Subject Vehicle Defect 1 and/or Alleged Subject Vehicle Defect 2.

Labor operations, labor operation descriptions, problem codes, problem code descriptions, DTCs, DTC descriptions, part numbers and part number descriptions potentially related to Alleged Subject Vehicle Defect 1 and/or Alleged Subject Vehicle Defect 2 are contained in the correspondingly titled columns in the database located in **ENCLOSURE 09** and titled PE18-016 SUBJECT_WARRANTY DATA.accdb.

New vehicle warranty coverage offered by FCA US on the subject vehicles equipped with a gas engine for 2013-2014MY is a 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 Roadside Assistance (5 years/100,000 miles).

New vehicle warranty coverage offered by FCA US on the subject vehicles equipped with a gas engine for 2015MY 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/unlimited miles) and Roadside Assistance (5 years/100,000 miles).

New vehicle warranty coverage offered by FCA US on the subject vehicles equipped with a gas engine for 2016-2018MY is basic limited warranty (3 years/36,000 miles), powertrain limited warranty (5 years/60,000 miles), corrosion limited warranty for outer panels (5 years/unlimited miles) and Roadside Assistance (5 years/60,000 miles).

New vehicle warranty coverage offered by FCA US on the subject vehicles equipped with a diesel engine for 2013-2014MY 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/100K miles) and Roadside Assistance (5 years/100,000 miles).

New vehicle warranty coverage offered by FCA US on the subject vehicles equipped with a diesel engine for 2015-2018MY 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/unlimited miles) and Roadside Assistance (5 years/100,000 miles).

Extended warranty and service contract coverage option(s) that FCA US offered for the subject vehicles, and the number of vehicles that are covered under each such extended warranty, is provided by option, model, and model year located in the table included in **ENCLOSURE 10** and titled PE18-016 Service Contracts Subject_CONF BUS INFO.pdf.

11. Produce copies of all service, warranty, and other documents that relate to, or may relate to, the alleged subject 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.

A11. 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. 11 is located in **ENCLOSURE 11** and contains the results of the searched records that FCA US has issued that relate to, or may relate to, the Alleged Subject Vehicle Defect 1 and/or Alleged Subject Vehicle Defect 2. Information related to 19V-021 (V06) recall is not included with this submission.

12. 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 subject 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:

- 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.

A12. FCA US' responses to subparts (a) through (f) are located in **ENCLOSURE 12** and titled Q12 Testing Summary_Subject_CONF BUS INFO.pdf. Representative copies of responsive documents are included within **ENCLOSURE 12**.

13. 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 subject 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.

A13. FCA US' responses to subparts (a) through (h) are located in **ENCLOSURE 13** and titled PE18-016 SUBJECT_Change History_CONF BUS INFO.pdf.

14. State the number of each of the following that FCA has sold that may be used in the subject 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 cut-off date for sales, if applicable):

- a. **Subject component; and,**
- b. **Any kits that have been released, or developed, by FCA for use in service repairs to the subject component/assembly.**

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 FCA is aware that contain the identical component, whether installed in production or in service, and state the applicable dates of production or service usage.

A14. FCA US' response to this request is located in **ENCLOSURE 14** and titled PE18-016 SUBJECT_Part Sales_CONF BUS INFO.pdf and PE18-016 SUBJECT_Supplier_Part_CONF BUS INFO.pdf

15. Furnish FCA's assessment of the alleged subject defect in the subject vehicles, 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;**
- e. **The change in consumer paid repair costs for routine maintenance services (e.g., front end alignment) that result from the remedy procedure FCA implemented for NHTSA recall 19V-021, and any anticipated actions or programs the company intends to offer consumers;**
- f. **What warnings, if any, the operator and the other persons both inside and outside the vehicle would have that the alleged subject defect was occurring or subject component was malfunctioning; and**
- g. **The reports included with this inquiry.**

A15. FCA US' responses as to the subject vehicles with 4x4-style steering linkage and 4x2-style steering linkage, respectively, are listed below.

4x4 Style Steering Linkage Assessment

FCA US provided its assessment with regard to the Alleged Subject Vehicle Defect in those Subject Vehicles with a 4x4 style steering linkage system in the Defect Information Report associated with NHTSA Recall No. 19V-021, originally submitted by FCA US on January 25, 2019, and as amended on March 14, 2019. As FCA US described in that Report, the outboard steering linkage jam nut in certain 2013-2018MY Ram vehicles could loosen, potentially allowing one end of the drag link to separate from the adjuster. A drag link separation can result in a loss of directional steering control, which in turn can cause a vehicle crash without prior warning. While there has yet to be a root cause determination for the defect described in that Report, an outboard jam nut not at proper torque could allow damage to the drag link outer bar and adjuster threads due to relative motion.

FCA US has reviewed VOQs with ODI Nos. 11064516, 11083519 and 11053917. FCA US assesses that the issues described in these three VOQs, describing two separate incidents, are consistent with the analysis and conclusions that led to the filing of the Defect Information Report in 19V-021.

A summary of the repair procedure FCA US implemented and communicated to dealers for the voluntary safety recall V06 (NHTSA Number: 19V-021) states:

“Inspect the [jam nut] torque values. If the torque values meet requirement, the nuts will be welded to the adjuster sleeve. If the torque values do not meet requirement, the threads will be measured. If thread engagement is acceptable, the link will be re-

assembled, the vehicle will be aligned, and the nuts will be welded to the adjuster sleeve. If the thread engagement is not adequate, the drag link assembly will be replaced.”

Per the recall remedy dealer instructions for voluntary safety recall 19V-021, certain vehicles will receive a new drag link assembly with a different design from the vehicle’s original drag link. For those vehicles receiving a new drag link assembly, FCA US expects there to be no change in consumer paid repair costs for routine maintenance services (e.g., front end alignment) that result from the remedy procedure FCA US implemented for voluntary safety recall 19V-021.

Per the recall remedy dealer instructions for voluntary safety recall 19V-021, certain vehicles will not receive a new drag link assembly, but will have the jam nuts welded to the adjuster. For those vehicles having the jam nuts welded to the adjuster, certain future vehicle service (e.g., front end alignment) may require the removal of welded jam nuts and adjuster. Once removed, FCA US does not recommend the reuse of a drag link assembly that previously had its jam nuts welded to the adjuster. Installation of a new drag link assembly is recommended in such circumstances. Table 5 – Estimated Repair Costs lists the average parts costs and average labor costs FCA US projects its dealers to charge for the installation of a new drag link assembly for each of the respective vehicle lines included in voluntary safety recall 19V-021. Table 5 – Estimated Repair Costs.pdf is located in **ENCLOSURE 15**. At the time of this Information Request Response, FCA US has not approved any actions or programs to assist consumers in the event a drag link with welded jam nuts must be removed for later service.

FCA US believes that, as a result of this voluntary field action, the Agency should close this investigation as it relates to any Alleged Subject Vehicle Defect involving a 4x4 style steering system.

4x2 Style Steering Linkage Assessment

While the 4x2 style steering linkage system is similar to the 4x4 style, the 4x2 style includes a critical difference that FCA US believes makes the 4x2 style highly resistant to the reported defect experienced by the 4x4 style. The 4x2 style has a significant geometric difference that reacts to axial loads and suspension bounce loads differently than the 4x4 style. The 4x2 drag link geometry is a straight line from the adjuster to its attachment point at the tie rod, while the 4x4 drag link has a 40 mm vertical offset between the adjuster and its attachment point at the top of the knuckle. This difference in attachment points and geometry results in minimal bending load on the 4x2 style drag link. Bending load, due to axial loading and bounce loading combined, in the 4x4 style design is calculated to be nearly three times the bending load in the 4x2 style design. See diagram titled STEERING LINKAGE COMPARISON_CONF BUS INFO.pdf located in **ENCLOSURE 15**. While root cause of the 4x4 style defect has not been established, FCA US believes that bending loads on the drag link is, at least, a causal contributing factor.

This reduced bending load on the 4x2 style steering linkage as a differentiating factor is consistent with the dearth of 4x2 style field incidents, as reflected in PE18-016 SUBJECT_REQUEST NUMBER TWO DATA.accdb located in **ENCLOSURE 3**. Specifically, FCA US did not identify a single incident that relates to, or may relate to, separation of steering linkage at the drag link adjuster resulting in loss of steering control in the subject vehicles with 4x2 style steering linkage. FCA US identified just five reports (two of which refer to the same incident) which relate to, or may relate to, loosening of either or both jam nuts at the adjuster. Only one of the four incidents included any documentation

Mr. Scott Yon
Reference: PE18-016
May 3, 2019

ATTACHMENT

Page 13 of 13

suggesting that the drag link was loose, however, the particular report related to that incident does not contain any reference to jam nuts. Additionally, three of the four incident reports stated the steering wheel was off center, alerting the driver to bring the vehicle in for service. No crashes, injuries, or fatalities are associated with any of these 4x2 style steering linkage incidents.

As a result of its assessment, FCA US believes the 4x2 style steering linkage does not pose an unreasonable risk to motor vehicle safety, and the Agency should close this investigation.