



National Highway Traffic Safety Administration

FEB 0 6 2020

<u>CERTIFIED MAIL</u> <u>RETURN RECEIPT REQUESTED</u>

Mr. Thomas McCarthy, Head Safety Compliance and Product Analysis Fiat Chrysler Automobiles US LLC 800 Chrysler Drive CIMS 482-00-83 Auburn Hills, Michigan 48326

NEF0102dp PE19-012

Dear Mr. McCarthy:

This letter is to inform you that the Office of Defects Investigation (ODI) of the National Highway Traffic Safety Administration (NHTSA) has opened a Preliminary Evaluation (PE) 19-012 to investigate allegations of defective welds applied to the frame assembly. The scope of the investigation is the model year (MY) 2018 through current production Jeep Wrangler (the JL platform vehicles) manufactured for sale in the United States and US territories by Fiat Chrysler Automobiles (FCA). This letter requests certain information as described below.

In September 2018, FCA filed NHTSA Safety Recall 18V-675 identifying a manufacturing-related weld defect of a suspension system bracket on the frame of certain MY 2018 Wrangler JL vehicles; the defect resulted in a safety concern affecting the steering system. As of January 24, 2020, ODI has identified 1066 reports that may potentially be related to the alleged defect, including reports of poor weld quality, steering system issues (which comprise over 90 percent of reports) and concerns for the vehicle's structural integrity (crashworthiness) during a crash event. Accordingly, the scope of this request seeks frame weld allegations as well as those of other potentially related systems, such as steering and suspension. An electronic copy of each report listed at the end of this letter will be provided to your office.

Unless otherwise stated in the text, the following definitions apply to these information requests:

- <u>Subject vehicles</u>: All MY 2018 through current production Jeep Wrangler JL platform vehicles manufactured for sale or lease in the United States, including, but not limited to, the District of Columbia, and current U.S. territories and possessions.
- <u>Alleged Defect</u>: Reports, including consumer complaints (e.g., CAIRs), lawsuits, those submitted by dealership personnel (technicians, sales staff, etc.) such as STAR cases and/or STAR on-line cases, and/or reports from FCA field staff (including third party and

contract staff such as EAA or Bosch Automotive Services) that involve any of the following allegations on the Subject Vehicles:

- 1. Concerns related to welds applied to the frame assembly such as:
 - a. Non-penetrating (cold) weld(s);
 - b. Over-penetrating (burn-thru) weld(s);
 - c. Porous weld(s);
 - d. Off-seam weld(s) (i.e., the weld was not centered on the materials to be joined);
 - e. Incomplete welds (the weld was not of sufficient length to properly secure the materials to be joined);
 - f. Any other manufactured weld defect that results in substandard structural integrity not included above; and
 - g. Disconnection, separation or improper positioning (locating) of any frame-related component due to an actual or alleged weld-related issue or failure.
- 2. Concerns related to the suspension system such as disconnection, separation or improper positioning (locating) of any suspension system-related component due to an actual or alleged frame weld-related issue or failure;
- 3. Concerns related to the steering system such as:
 - a. Pulling/drifting from the driver's intended or steered direction while driving;
 - b. Intermittent lock-up/stiction;
 - c. Unresponsive and/or vague steering feel or response when operating in the near straight ahead (wheel centerline) position;
 - d. Vibration, oscillation or wobbling while driving, including after encountering bumps, potholes or other irregular roadway surfaces; and
 - e. Disconnection, separation or improper positioning (locating) of any steering system-related component due to an actual or alleged frame weld-related issue or failure.
- 4. Concerns related to the safety performance and/or structural integrity of the frame, suspension, or steering systems occurring during or during the course of a crash event.
- FCA: Fiat Chrysler Automobiles, all of their past and present officers and employees, whether assigned to their principal offices or any of their field or other locations, including all of their divisions, subsidiaries (whether or not incorporated) and affiliated enterprises and all of their headquarters, regional, zone and other offices and their employees, and all agents, contractors, consultants, attorneys and law firms and other persons engaged directly or indirectly (e.g., employee of a consultant) by or under the control of FCA (including all business units and persons previously referred to), who are or, in or after January 1, 2014, were involved in any way with any of the following related to the alleged defect in the subject vehicles:
 - a. Design, engineering, analysis, modification or production (e.g. quality control);
 - b. Testing, assessment or evaluation;
 - c. Consideration, or recognition of potential or actual defects, reporting, record-keeping and information management, (e.g., complaints, field reports, warranty information, part sales), analysis, claims, or lawsuits; or

- d. Communication to, from or intended for zone representatives, fleets, dealers, or other field locations, including but not limited to people who have the capacity to obtain information from dealers.
- **Document:** "Document(s)" is used in the broadest sense of the word and shall mean all original written, printed, typed, recorded, or graphic matter whatsoever, however produced or reproduced, of every kind, nature, and description, and all non-identical copies of both sides thereof, including, but not limited to, papers, letters, memoranda, correspondence, communications, electronic mail (e-mail) messages (existing in hard copy and/or in electronic storage), faxes, mailgrams, telegrams, cables, telex messages. notes, annotations, working papers, drafts, minutes, records, audio and video recordings, data, databases, other information bases, summaries, charts, tables, graphics, other visual displays, photographs, statements, interviews, opinions, reports, newspaper articles, studies, analyses, evaluations, interpretations, contracts, agreements, jottings, agendas, bulletins, notices, announcements, instructions, blueprints, drawings, as-builts, changes, manuals, publications, work schedules, journals, statistical data, desk, portable and computer calendars, appointment books, diaries, travel reports, lists, tabulations, computer printouts, data processing program libraries, data processing inputs and outputs, microfilms, microfiches, statements for services, resolutions, financial statements, governmental records, business records, personnel records, work orders, pleadings, discovery in any form, affidavits, motions, responses to discovery, all transcripts, administrative filings and all mechanical, magnetic, photographic and electronic records or recordings of any kind, including any storage media associated with computers, including, but not limited to, information on hard drives, floppy disks, backup tapes, and zip drives, electronic communications, including but not limited to, the Internet and shall include any drafts or revisions pertaining to any of the foregoing, all other things similar to any of the foregoing, however denominated by FCA, any other data compilations from which information can be obtained, translated if necessary, into a usable form and any other documents. For purposes of this request, any document which contains any note, comment, addition, deletion, insertion, annotation, or otherwise comprises a non-identical copy of another document shall be treated as a separate document subject to production. In all cases where original and any non-identical copies are not available, "document(s)" also means any identical copies of the original and all non-identical copies thereof. Any document, record, graph, chart, film or photograph originally produced in color must be provided in color. Furnish all documents whether verified by FCA or not. If a document is not in the English language, provide both the original document and an English translation of the document.
- Other Terms: To the extent that they are used in these information requests, the terms "claim," "consumer complaint," "dealer field report," "field report," "fire," "fleet," "good will," "make," "model," "model year," "notice," "property damage," "property damage claim," "rollover," "type," "warranty," "warranty adjustment," and "warranty claim," whether used in singular or in plural form, have the same meaning as found in 49 CFR 579.4.

In order for my staff to evaluate the alleged defect, certain information is required. Pursuant to 49 U.S.C. § 30166, please provide numbered responses to the following information requests. Insofar as FCA has previously provided a document to ODI, FCA may produce it again or identify the document, the document submission to ODI in which it was included and the precise location in that submission where the document is located. When documents are produced, the documents shall be produced in an identified, organized manner that corresponds with the organization of this information request letter (including all individual requests and subparts). When documents are produced and the documents would not, standing alone, be self-explanatory, the production of documents shall be supplemented and accompanied by explanation.

Please repeat the applicable request verbatim above each response. After FCA's response to each request, identify the source of the information and indicate the last date the information was gathered.

- 1. State, by model and model year, the number of subject vehicles FCA has manufactured for sale or lease in the United States. In its response, FCA should only include vehicles not included in the DP18-004 Information Request (IR) submission produced in the interim period that fall in the scope of this request. 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;
 - e. Date of manufacture of the frame;
 - f. Date warranty coverage commenced;
 - g. 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."

- 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. In its response, FCA should only provide information not originally included in the DP18-004 IR submission received in the interim period that falls under the scope of this request. FCA's response should also include updated information to responses previously submitted under the DP18-004 IR, if applicable.
 - 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.

- 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. Whether the item was previously submitted under the DP18-004 IR response;
 - e. Vehicle's VIN;
 - f. Vehicle's model year;
 - g. Vehicle's mileage at time of incident;
 - h. Incident date:
 - i. Report or claim date;
 - j. 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);
 - k. Whether a crash is alleged;
 - 1. 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." For item i, FCA should provide each unique defect identifier (as defined under the Alleged Defect) of its response(s) in a separate cell or field.

- 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.
- 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.

In its response, FCA should only provide information not originally included in the DP18-004 IR submission received in the interim period that falls under the scope of this request. 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;
- 1. 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."

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.

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.

- 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. In its response, FCA should only provide information not originally included in the DP18-004 IR submission received in the interim period that falls under the scope of this request. 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.

- 9. In discussions that took place on July 11, 2019 between FCA and NHTSA, NHTSA was made aware of the availability of frame structural fatigue data generated during the development of the previous generation Jeep Wrangler, JK. NHTSA was also made aware that such information could be considered comparable to the JL development fatigue data that was received in the DP18-004 IR submission. NHTSA seeks to acquire this structural fatigue related information for the frame of the Jeep Wrangler, JK and Jeep Gladiator, JT, as well as similar information generated during the manufacturing and production of the subject vehicles. The response to this request must include specific information regarding the following:
 - a. JL platform development proving ground documents for individual vehicles, as referenced in the confidential portions of the DP18-004 IR submission
 - b. JL platform development road simulator documents as referenced in the confidential portions of the DP18-004 IR submission
 - c. JK platform development bench fatigue, proving ground, and road simulator documents or contemporaneous developmental equivalents
 - d. JT platform development bench fatigue, proving ground, and road simulator documents
 - e. JL platform "eCIMs" generated during development bench fatigue, proving ground, or road simulator testing.
 - f. All "GEMS" and "NCT" documentation related to alleged defect 1, 2, 3e and 4. FCA's response should include documentation related to substandard fitment between steering and suspension components, in reference to and defined by FCA internally accepted dimensioning and tolerancing.

For each of the above, provide copies of all relevant documents, regardless of whether the documents are in interim, draft, or final form. Organize the documents chronologically by action.

10. In responses submitted during DP18-004, FCA outlined several actions that took place, or will take place to address the steering concerns identified in VOQs submitted to NHTSA. ODI is requesting additional technical information that support the component modifications FCA discussed.

For each subject vehicle component listed below, provide a detailed summary of all applicable part numbers, including a description of the specific modifications made to the component, along with the engineering rationale and justification for each modification FCA implemented. State whether each component modification was incorporated into vehicle production and/or issued as a service part, and state the dates for these actions:

- a. The steering damper part;
- b. The front track bar;
- c. The steering linkage; and,
- d. The steering gear and pump assembly.

FCA should only include information regarding modifications made to address the alleged defects, however FCA's responses should be comprehensive and include any specific documentation available. Additionally, provide the above information for any modification or change that FCA is aware of which may be incorporated into vehicle production or as a service part within the next 120 days, and that is related to the alleged defect.

- 11. In its DP18-004 response, FCA acknowledged the existence of subject vehicle frame weld failures that occurred outside the scope of recall 18V-675. For each such frame weld failure that occurred, provide a detailed explanation of any contributory factors FCA identified, and/or any corrective actions or countermeasures FCA implemented in response to the failures. Also provide any related documentation.
- 12. 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;
 - f. The effectiveness of each action taken to address an alleged defect; and
 - g. The reports included with this inquiry.

Legal Authority for This Request

This letter is being sent to FCA pursuant to 49 U.S.C. § 30166, which authorizes NHTSA to conduct any investigation that may be necessary to enforce Chapter 301 of Title 49 and to request reports and the production of things. It constitutes a new request for information.

Civil Penalties

FCA's failure to respond promptly and fully to this letter could subject FCA to civil penalties pursuant to 49 U.S.C. § 30165 or lead to an action for injunctive relief pursuant to 49 U.S.C. § 30163. (Other remedies and sanctions are available as well.) The Vehicle Safety Act, as amended, 49 U.S.C. § 30165(a)(3), provides for civil penalties of up to \$21,000 per violation per day, with a maximum of \$105,000,000 for a related series of daily violations, for failing or refusing to perform an act required under 49 U.S.C. § 30166. *See* 49 CFR 578.6 (as amended by Fixing America's Surface Transportation Act (the "FAST Act"), Pub. L. 114-94, § 24110(a)(2), 129 Stat. 1312 (Dec. 4, 2015)). This includes failing to respond completely, accurately, and in a timely manner to ODI information requests.

If FCA cannot respond to any specific request or subpart(s) thereof, please state the reason why it is unable to do so. If on the basis of attorney-client, attorney work product, or other privilege, FCA does not submit one or more requested documents or items of information in response to this information request, FCA must provide a privilege log identifying each document or item withheld, and stating the date, subject or title, the name and position of the person(s) from, and the person(s) to whom it was sent, and the name and position of any other recipient (to include all carbon copies or blind carbon copies), the nature of that information or material, and the basis for the claim of privilege and why that privilege applies.

Confidential Business Information

All business confidential information must be submitted directly to the Office of Chief Counsel as described in the following paragraph and should not be sent to this office. In addition, do not submit any business confidential information in the body of the letter submitted to this office. Please refer to PE19-012 in FCA's response to this letter and in any confidentiality request submitted to the Office of Chief Counsel.

If FCA claims that any of the information or documents provided in response to this information request constitute confidential commercial material within the meaning of 5 U.S.C. § 552(b)(4), or are protected from disclosure pursuant to 18 U.S.C. § 1905, FCA must submit supporting information together with the materials that are the subject of the confidentiality request, in accordance with 49 CFR Part 512, as amended, to the Office of Chief Counsel (NCC-100), National Highway Traffic Safety Administration, Room W41-227, 1200 New Jersey Avenue, S.E., Washington, D.C. 20590. FCA is required to submit two copies of the documents containing allegedly confidential information (except only one copy of blueprints) and one copy of the documents from which information claimed to be confidential has been deleted. Please remember that the phrase "ENTIRE PAGE CONFIDENTIAL BUSINESS INFORMATION" (as

appropriate) <u>must</u> appear at the top of each page containing information claimed to be confidential, and the information must be clearly identified in accordance with 49 CFR 512.6. If you submit a request for confidentiality for all or part of your response to this IR, that is in an electronic format (e.g., CD-ROM), your request and associated submission must conform to the new requirements in NHTSA's Confidential Business Information Rule regarding submissions in electronic formats. *See* 49 CFR 512.6(c) (as amended by 72 Fed. Reg. 59434 (October 19, 2007)).

If you have any questions regarding submission of a request for confidential treatment, contact Daniel Rabinovitz, Trial Attorney, Office of Chief Counsel at daniel.rabinovitz@dot.gov or (202) 366-8534.

Due Date

FCA's response to this letter, in duplicate, together with a copy of any confidentiality request, must be submitted to this office by **March 27, 2020.** FCA's response must include all non-confidential attachments and a redacted version of all documents that contain confidential information. If FCA finds that it is unable to provide all of the information requested within the time allotted, FCA must request an extension from me at (202) 366-0139 no later than five business days before the response due date. If FCA is unable to provide all of the information requested by the original deadline, it must submit a partial response by the original deadline with whatever information FCA then has available, even if an extension has been granted.

Please send email notification to Daniel Pinero-Espinoza at daniel.pinero@dot.gov and to ODI_IRresponse@dot.gov when FCA sends its response to this office and indicate whether there is confidential information as part of FCA's response.

If you have any technical questions concerning this matter, please call Daniel Pinero-Espinoza of my staff at (202) 366-5677.

Scott Yon, Chief

Vehicle Defects Division B

Office of Defects Investigation

Of those noted above, the VOQ reports that have been identified since the DP18-004 IR letter can be viewed at NHTSA.gov under the following ODI numbers (see the DP18-004 IR letter for the balance of the ODI report numbers):

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11166287, 11179954, 11183787, 11184235, 11184248, 11184439, 11184513, 11184729,
11184737, 11184747, 11184765, 11184779, 11184800, 11184844, 11184870, 11184923,
11184929, 11185105, 11185439, 11185442, 11185461, 11185464, 11185485, 11185633,
11185655, 11185696, 11185739, 11185784, 11185875, 11185957, 11186009, 11186011,
11186338, 11186397, 11186737, 11186824, 11187195, 11187387, 11190190, 11190939,
11191002, 11191005, 11191046, 11191158, 11191225, 11191257, 11191326, 11191486,
11192203, 11192448, 11192721, 11192803, 11192881, 11193044, 11193101, 11193102,
11193287, 11193506, 11193528, 11193532, 11193588, 11193683, 11193811, 11193925,
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