

8/6/26, 2:08 PM

USDOT Mail - FW: PE19-014 Extension Request



Gugiu, Iulian <iulian.gugiu@dot.gov>

FW: PE19-014 Extension Request

5 messages

Yon, Scott (NHTSA) <Scott.Yon@dot.gov>
 To: "Gugiu, Iulian (NHTSA)" <iulian.gugiu@dot.gov>

Wed, Oct 30, 2019 at 8:50 PM

Fyi. I can explain this to you, stop by.

Scott Yon

202-366-0139

From: Cheryl Fry <cheryl.fry@fcagroup.com>

Sent: Wednesday, October 30, 2019 6:00 PM

To: Yon, Scott (NHTSA) <Scott.Yon@dot.gov>; Cheryl Fry <cheryl.fry@fcagroup.com>; Paul Duncanson <paul.duncanson@fcagroup.com>

Subject: PE19-014 Extension Request

Scott,

As a follow-up to our discussion yesterday evening, FCA US requests an extension to provide the response to PE19-014 in full on December 6, 2019 due to the enormity of the request, and the large, labor intensive volume of work necessary to properly respond. FCA US is respectfully requesting this 18 "regular business day" extension to allow the company to provide a complete, thorough and accurate response to the Agency's Information Request. While FCA US typically readily agrees to provide partial responses and information when requesting an extension, in this instance it believes providing data prior to the requested extension date will introduce avoidable errors and confusion into the process, resulting in the need to later adjust the data previously provided. That is not an efficient use of FCA US or Agency resources.

PE19-014 encompasses 9 vehicle families with some in production for 10 years. In response to the breadth of the information requested, FCA US has re-deployed significant Product Investigations resources to respond to PE19-011 and PE19-014, in an effort to meet both of the requested due dates. These Information requests are running concurrently, with PE19-011 due November 6, 2019 and PE19-014 due November 12, 2019. FCA US did not request an extension for PE19-011 and intends to timely respond on the November 6, 2019 due date.

The 18 day extension request takes into account: 1) the large volume of data records to be reviewed, compiled and analyzed (17,000+ records); 2) shared resources between the two formal investigation Information Requests; 3) key members of the team will be out of the country for business the week of November 4, 2019, effectively eliminating

their ability to participate in the response process; and 4) production of the large amount of responsive material will take several days to process for submission. As a side note, the requested extension will also span both the November 11th Armistice Day federal holiday and Thanksgiving.

Finally, FCA US notes that the Agency previously has expressed the view that the process of preparing our response might be streamlined given FCA US' prior investigation into the underlying issues involved in PE19-014. Unfortunately, that is not the case. While FCA US has dedicated significant internal investigation resources into those issues, the processes of preparing a formal response to an Agency investigation necessarily is distinct. Information Request responses have particular analytical and document/data production requirements that effectively require us to undertake independent efforts that cannot be avoided or cut short.

Thank you for your consideration.

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Cheryl Fry

Sr Manager – Product Investigations

Email: cheryl.fry@fcagroup.com

Cell: [REDACTED]

Yon, Scott (NHTSA) <Scott.Yon@dot.gov>

Sun, Nov 3, 2019 at 8:57 PM

To: Cheryl Fry <cheryl.fry@fcagroup.com>

Cc: "Gugiu, Iulian (NHTSA)" <iulian.gugiu@dot.gov>, Paul Duncanson <paul.duncanson@fcagroup.com>

Thank you Cheryl, we have reviewed FCA's request for an 18 business day extension. For reference, the letter was issued 9/24, and the original due date was set for 11/12, which is a 7 week response period normally expected for a domestic OEM response. ODI often grants 10 business day extensions when it involves a mostly boilerplate IR requests, as is the case here, which would make the new due date 11/26. Given that this date falls in the week of Thanksgiving, VDD-B can extend the response date to 12/3, a 14 business day extension. As we discussed, VDD-B's primary interest is in obtaining responses to requests 1 through 6. To the extent it might be helpful, we are willing to discuss an additional extension for the remaining requests, given some of the concerns raised below, let me know.

Thank you,

Scott

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Cheryl Fry <cheryl.fry@fcagroup.com>

Mon, Nov 4, 2019 at 8:57 AM

To: "Yon, Scott (NHTSA)" <Scott.Yon@dot.gov>

Cc: "Gugiu, Iulian (NHTSA)" <iulian.gugiu@dot.gov>, Paul Duncanson <paul.duncanson@fcagroup.com>

Scott,

Thank you for granting an extension. FCA US will plan to provide responses to questions 1-6 on December 3, 2019. Also, thank you for your consideration on the remaining requests.Q 7-11. FCA US will assess if additional time is necessary to respond to the remaining requests by December 3rd and will contact NHTSA once it is known to request a further extension if necessary.

Thank you

Cheryl

[Quoted text hidden]

Yon, Scott (NHTSA) <Scott.Yon@dot.gov>
To: "Gugiu, Iulian (NHTSA)" <iulian.gugiu@dot.gov>

Wed, Nov 6, 2019 at 12:38 PM

You will need to do a short memo to the PE19-014 file stating that we have granted an extension for the IR response, stop by and I will explain further.

Scott Yon

202-366-0139

f-202-366-1767

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Gugiu, Iulian (NHTSA) <iulian.gugiu@dot.gov>
To: "Howell, Rosa (NHTSA)" <Rosa.Howell@dot.gov>

Thu, Nov 7, 2019 at 9:35 AM

This is the email regarding the extension request.

Iulian Gugiu

ODI - Electronics Engineer

DOT - NHTSA

From: Cheryl Fry [mailto:cheryl.fry@fcagroup.com]

Sent: Monday, November 4, 2019 8:57 AM

To: Yon, Scott (NHTSA) <Scott.Yon@dot.gov>

Cc: Gugiu, Iulian (NHTSA) <iulian.gugiu@dot.gov>; Paul Duncanson <paul.duncanson@fcagroup.com>

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