

Howell, Rosa (NHTSA)

From: Gugiu, Iulian (NHTSA)
Sent: Thursday, October 8, 2020 1:03 PM
To: Howell, Rosa (NHTSA)
Cc: Yon, Scott (NHTSA)
Subject: FW: PE19-014

Hi Rosa,
Would you mind adding this email response to the internal repository for investigation PE 19-014.
Thank you

Iulian Gugiu
ODI - Electronics Engineer
DOT - NHTSA

From: Cheryl Fry [mailto:cheryl.fry@fcagroup.com]
Sent: Thursday, October 8, 2020 8:42 AM
To: Yon, Scott (NHTSA) <Scott.Yon@dot.gov>; Gugiu, Iulian (NHTSA) <iulian.gugiu@dot.gov>
Subject: Re: PE19-014

CAUTION: This email originated from outside of the Department of Transportation (DOT). Do not click on links or open attachments unless you recognize the sender and know the content is safe.

Scott,

FCA US is not able to meet the October 14, 2020 requested response date. I am requesting an extension of one week to provide the response. The response proposal date is October 21, 2020.

Thank you for your consideration

Cheryl

On Tue, Sep 22, 2020 at 10:21 PM Yon, Scott (NHTSA) <Scott.Yon@dot.gov> wrote:

Thank you for meeting with us on the above yesterday. Here are the questions/requests discussed.

1. State whether FCA has conducted any type of statistical modeling (e.g., Weibull or similar) that would forecast future failure rates for inadvertent AHR deployments in AHR equipped FCA products due to the failure mechanism under review in PE19-014;
 - a. If so, submit FCA's analysis;
 - b. If not, state whether FCA intends to conduct such a statistical analysis;
 - i. If yes, state the target completion date for FCA's analysis (or if unknown, the date the target completion date will be known);

2. Provided updated responses to the PE19-014 IR letter (dated 9/24/2020) requests 2, 3, 4 and 5, using the same alleged defect statement, and for the Jeep Grand Cherokee model (only) that were produced prior to September 1, 2017. Include all documents and databases requested. FCA's response should only include responses (records and documents) not previously submitted to NHTSA in connection with PE19-014;
3. FCA's response to request 11 of the 9/24/2020 PE19-014 IR letter made mention of a potential warranty extension program (program) to address active head rest failures in certain FCA vehicles. Provide additional detail regarding the proposed program including the following;
 - a. Date the program was initiated, or will be initiated;
 - b. Make, model, model year and any other pertinent parameters (e.g., date of manufacture, vehicle specification, etc.) used to identify the vehicles that will be included in the program;
 - i. Explain why AHR equipped vehicles that do not meet the above criteria are being excluded;
 - c. The terms for the coverage of the program (e.g., vehicle age, mileage, or other parameter limitations), including how those terms are determined or calculated;
 - d. The types of active head rest failures that will be covered, and will not be covered by the program, including specific examples of each category;
 - e. Whether a letter has, or will be sent to current owners of the affected vehicles;
 - i. If a letter has or will be sent, provide a copy of the letter or the current draft;
 - f. Whether reimbursement will be offered to owners who have previously experienced an AHR failure and paid to have it repaired;
 - i. If reimbursement is being offered, describe the reimbursement claim process including what documentation that is required, determination or any limitations for the reimbursement amount allowed, and the maximum time an owner is expected to wait for reimbursement once a valid claim has been submitted;
 - g. Whether the program is transferable to subsequent owners, or any such limitations for eligibility of subsequent owners;
 - h. Whether the existence and availability of the program will be made available (by VIN search) at Mopar.com/recalls;
 - i. If not, explain why this is not being offered;
 - i. Whether there are any remedy parts constraints that would prevent owners for receiving a repair once the program is initiated, or whether FCA anticipates that a parts constraint could occur in the future;
 - j. Whether the AHR replacement will only occur after a failure has occurred, or if there is any scenario where the AHR will be replaced proactively at the owners request, and if so what the scenario would be;
 - k. Describe the remedy part that will be used to replace a failed AHR and how it differs from the failed part and is therefore not expected to fail again; and,
 - l. Whether the program will cover replacement of a failed AHR that was previously replaced under the program.

FCA's responses to these requests are due to the agency by the close of business on 10/14/2020. Please contact me as soon as possible if this date is not achievable.

Scott

Scott Yon

202-366-0139

f-202-366-1767

From: Erin Pitts [mailto:erin.pitts@fcagroup.com]
Sent: Saturday, September 12, 2020 10:39 PM
To: Yon, Scott (NHTSA) <Scott.Yon@dot.gov>
Cc: Cheryl Fry (FCA) <cheryl.fry@fcagroup.com>; Gugiu, Iulian (NHTSA) <iulian.gugiu@dot.gov>
Subject: Re: PE19-014

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Will do.

Have a great weekend.

On Sat, Sep 12, 2020 at 10:37 PM Yon, Scott (NHTSA) <Scott.Yon@dot.gov> wrote:

Thank you Erin, it looks like we are available Monday 9/21 at 11. Can you send a meeting invite please?

Scott

Scott Yon

202-366-0139

f-202-366-1767

From: Erin Pitts [mailto:erin.pitts@fcagroup.com]

Sent: Friday, September 11, 2020 3:04 PM

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

Cc: Cheryl Fry (FCA) <cheryl.fry@fcagroup.com>; Gugiu, Iulian (NHTSA) <iulian.gugiu@dot.gov>

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Hi Scott,

We are unavailable at that time on Thursday. Would a half hour block Monday (9/21) between 11-1 or Tuesday (9/22) between 10-11 work.

Thank you

Regards,

Erin

On Thu, Sep 10, 2020 at 4:47 PM Yon, Scott (NHTSA) <Scott.Yon@dot.gov> wrote:

Hi Cheryl and Erin, I wanted to see if FCA was available to discuss the above investigation next Thursday. I am available between 2 and 4, we need a half hour. We wanted to update

you on our review of the IR data and also to request updated and new information. If Thursday won't work then please propose date for the following week.

Scott



Name: Scott Yon

Department of Transportation

National Highway Traffic Safety Administration

Room W48-314

[1200 New Jersey Avenue SE., Washington, DC 20590](#)

[Office: 202-366-0139](#) Cell: 202-309-6883



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Erin Pitts

Vehicle Safety and Regulatory Compliance Office

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