

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 FCA. Pursuant to the sales transaction, FCA 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 FCA, 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, FCA changed its name to FCA US LLC (“FCA US”).

Note: FCA US makes the following clarifications:

- The subject vehicles state two groups of vehicles: “... a “4x2 style” drivetrain or a “4x4 style” drivetrain that has been remedied...” FCA US interprets this to be two distinct populations; 1) Ram 4x2 vehicles and 2) Ram 4x4 vehicles repaired in campaign 19V-021. FCA US notes that there are some 4x2 vehicles that were included in the noted recall, 19V-021, and have been remedied. These are 4x2 vehicles were included in the campaigns because they were built with a 4x4 style steering linkage. For the purposes of this investigation response, FCA US has included these vehicles in the second group of “4x4 style” vehicles that have been remedied. NHTSA and FCA US discussed this in a phone call between Bruce York and Chris Freeman on August 5, 2025.

1. Produce a list of vehicles that have been repaired under Recall No. 19V-021. Separately, for each repaired vehicle, state the following:
 - a. Vehicle identification number (17-character VIN);
 - b. Date recall remedy performed; and
 - c. Provide which remedy operation was applied, welding of the adjuster (W) or replacement of the drag link assembly (R).

Provide the table in Microsoft Access 2010, or a compatible format, entitled "RECALL DATA." A pre-formatted data collection file, which provides further details regarding this submission, will be provided to you.

- A1. FCA US' responses to subparts a through c of this Request are located in **ENCLOSURE 01** and titled **EA19-004_RECALL 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; and
 - e. Third-party arbitration proceedings, both pending and closed, 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).

- A2. FCA US has conducted a reasonable and diligent search of the normal repositories of information potentially responsive to this Request. Responsive, non-privileged information identified through that search comprises FCA US' responses to subparts (a) through (f) of this Request. That information is located in **ENCLOSURE 02** and titled **EA19-004_REPORTS_19V021 Repaired.pdf** and **EA19-004_REPORTS_4x2.pdf**.
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), email address and telephone number (please use distinct fields for each data type);
- d. Vehicle owner or fleet street address, city, state (postal abbreviation), and ZIP code (please use distinct fields for each data type);
- e. Vehicle's 17-character VIN;
- f. Vehicle's make, model and model year (please use distinct fields for each data type);
- g. Vehicle's mileage at time of incident (numeric data type);
- h. Incident date (MM/DD/YYYY);
- i. Report or claim date (MM/DD/YYYY);
- 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 TWO DATA." A pre-formatted data collection file, which provides further details regarding this submission, will be provided to you.

A3. FCA US' responses to subparts (a) through (m) of this Request are located in **ENCLOSURE 03** and titled **EA19-004_REQUEST NUMBER TWO DATA_19V021 Repaired.accdb** and **EA19-004_REQUEST NUMBER TWO DATA_4x2.accdb**.

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. 4 In addition, for items "2c" through "2f," provide a summary description of the alleged incident, to include causal and contributing factors, and FCA's assessment of the incident, with a summary of the significant underlying facts and evidence. For items "2f" and "2g," identify the parties to the action, as well as the caption, court, docket number, description of resolution (if closed), date on which the complaint or other document initiating the action was filed, and provide any associated documents containing objective, analytical, or technical information.

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 by using information such as the Vehicle Identification Number ("VIN") list of the Subject Vehicles, filtered by each respective Subject Vehicle's repair date, and a keyword search using words reasonably related to the reports sought by this IR. The keyword search criteria used in this search are located in **ENCLOSURE 04** and titled **EA19-004_Q2 KEYWORD SEARCH CRITERIA.pdf**. FCA US then did an eyes-on review of the search results was then conducted to determine whether each returned record relates to, or may relate to, the Alleged Defect.

Copies of the available, non-privileged documents related to each item within the scope of Request No. 2 can be found in **ENCLOSURE 04**.

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.**

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

- a. **FCA 's claim number;**
- b. **Vehicle owner or fleet name (and fleet contact person), email address and telephone number (please use distinct fields for each data type);**
- c. **Vehicle owner or fleet street address, city, state (postal abbreviation), and ZIP code (please use distinct fields for each data type);**
- d. **17-character VIN;**
- e. **Repair date (MM/DD/YYYY);**
- f. **Vehicle mileage at time of repair (numeric data type);**
- g. **Repairing dealer's or facility's name, telephone number, city and state or ZIP code (please use distinct fields for each data type);**
- h. **Labor operation number(s);**
- i. **Problem code(s);**
- j. **Diagnostic trouble code(s);**
- k. **Replacement part number(s) and description(s);**
- l. **Concern stated by customer;**
- m. **Cause as stated on the repair order;**
- n. **Correction as stated on the repair order; and**
- o. **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."

- A5. FCA US is submitting a preliminary response and will supplement its response to Request 5 on or before September 5, 2025.

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.**

- A6. In order to identify the claims detailed in its response to Request No. 5, FCA US searched the normal repositories of information potentially responsive to this Request utilizing Labor Operation Procedure ("LOP") codes applied to a Vehicle Identification Number ("VIN") list of the Subject Vehicles. The claims

were then filtered by each Subject Vehicle's respective repair date, plus one month and an eyes on review of the claims to determine responsiveness to the alleged defect. The LOP codes used for this search can be found in **ENCLOSURE 06** and titled **EA19-004_LABOR OPERATION CODES.pdf**. Of note, most of the claims identified did not have information which suggested either alleged defect condition was present on the vehicle at the time of the warranty claim. There is significant data available which suggests that the subsequent related repair was not due to loss of steering control or loose jam nuts, but instead due to customer, dealer, or independent repair facility cutting the weld improperly and unnecessarily to align the vehicle and then rewelding the jam nuts. FCA US has provided, similar to other service instructions and repair manuals, a publicly available procedure for aligning these vehicles without cutting the weld. Furthermore, FCA US has instructed dealers that if they cannot perform an alignment and center the steering wheel, they should request authorization for replacement of the drag link. FCA US has authorized several thousand drag link replacements free of charge.

7. Furnish FCA's assessment of the alleged 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; 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, or subject component was malfunctioning;**
- f. The other reports included with this inquiry.**

A7: On May 3, 2019, FCA US submitted a response to PE18-016 which included detailed responses and analysis of the alleged defect in both the 4x4 style steering linkage as well as the 4x2 style steering linkage. FCA US issued 19V-021 for all 2013-2018 Ram 2500 and 3500 vehicles built with a 4x4 style drag linkage. Furthermore, in the May 3, 2019 response, FCA US detailed key differences between the 4x4 style linkage and the 4x2 style linkage, explaining the lack of failures in the population of vehicles with a 4x2 style linkage. Since that submission, field data and additional experimental data developed by NHTSA supports those conclusions.

4x4 Style Steering Linkage – Vehicles Remedied under 19V-021

FCA US searched and reviewed all claims that relate to and may relate the alleged defect in the population of vehicles included and repaired in 19V-021. FCA US identified a total of 129 customer complaints and field reports that are potentially related to the alleged defect in this population. This represents a rate of 0.12 c/1000 for records that relate to and 0.19 c/1000 for all claims that relate to and may relate. This exceedingly low rate does not indicate an issue with the repair but instead suggests some rare, isolated instances where the owner may have been unhappy with the initial repair. The warranty data does show a number of post remedy re-weld repairs, however, there is significant evidence that the welds were deliberately (and erroneously) cut while performing an alignment corroborating the above explanation. FCA US continues to review warranty but has not yet found incidents where the repair is failing and leading to a loss of steering control or lose jam nuts.

4x2 Style Steering Linkage

FCA US searched and reviewed all claims that relate to and may relate to the alleged defect in the population of vehicles with a 4x2 style steering linkage. FCA US identified a total of 25 customer complaints and field reports that are potentially related to the alleged defect in this population. This includes 19 which appear to relate to the alleged defect and six which may relate to the alleged defect. While the rate is more sensitive to low numbers of incidents due to lower production volumes, it is still exceedingly small at 0.34 c/1000 and 0.45 c/1000 for all claims that relate to and may relate.

Conclusion

FCA US has reviewed the data provided in response to the Requests above and the VOQs provided by NHTSA in conjunction with this IR. Based on that review, FCA US concludes that recall 19V-021 was properly scoped, addressing only 4x4 style steering linkages and that the remedy was effective. Therefore, there is no new or unaddressed unreasonable risk to motor vehicle safety with respect to the Alleged Defect in the Subject Vehicles. FCA US understands that some owners are dissatisfied with the repair and some alignment shops failed to understand how to properly align a vehicle with the jam nuts welded, however, the remedy has mitigated the safety defect without substantially impairing operation the vehicle. FCA US respectfully requests that the Agency close this investigation.