



Thomas McCarthy
Head, Vehicle Safety Compliance and
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November 05, 2019

Mr. Scott Yon
Chief, Vehicle Defects Division – B
Office of Defects Investigation, NVS-212
U.S. Department of Transportation
National Highway Traffic Safety Administration
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Room W48-314
1200 New Jersey Avenue SE
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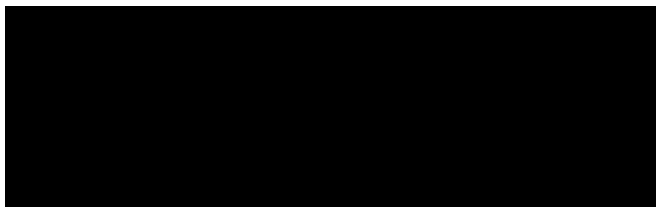
Reference: NEF-102rdc; PE19-011

Dear Mr. Yon:

Enclosed is the response of FCA US LLC (“FCA US”) to the September 18, 2019, Information Request issued in the above-referenced investigation. This constitutes FCA US’s full response to this Information Request.

FCA US is submitting to the Chief Counsel’s Office, via courier for next day delivery, an accompanying request for confidentiality pursuant to 49 C.F.R. Part 512 and Exemption 4 to the Freedom of Information Act.

Sincerely,



Thomas McCarthy
Head, Vehicle Safety Compliance and Product Analysis

Attachment and Enclosures
cc. Jonathan Morrison, Chief Counsel’s Office

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 ("IR"), 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-[REDACTED]).

Effective December 15, 2014, Chrysler Group LLC changed its name to FCA US LLC ("FCA US").

Note: Unless indicated otherwise in the response to a question, this document contains information up to September 18, 2019, the date this IR was received.

This attachment contains FCA US' response to the IR issued in Investigation PE19-011, as clarified via email with Scott Yon of the National Highway Traffic Safety Administration's ("NHTSA") Office of Defects Investigation ("ODI") on September 23, 2019.

- In response to Request No. 1, subpart e, FCA US will provide a separate table containing the production part numbers for the Subject Vehicles by Model Year.
-

1. **State, by model and model year, the number of subject vehicles Chrysler has manufactured for sale or lease in the United States. Separately, for each subject vehicle manufactured to date by Chrysler, state the following:**
 - a. **Vehicle identification number (VIN);**
 - b. **Make;**
 - c. **Model;**
 - d. **Model Year;**
 - e. **Subject component part number and design version 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 (d) and (f) through (h) of this Request are located in ENCLOSURE 01 and titled PE19-011_PRODUCTION DATA.accdb. The response to subpart (e) of the Request is located in ENCLOSURE 01 and titled PE19-011_TABLE 1 – PART NUMBERS_CONF BUS INFO.pdf.

2. **State the number of each of the following, received by Chrysler, or of which Chrysler 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 Chrysler is or was a party to the arbitration; and**
 - f. **Lawsuits, both pending and closed, in which Chrysler 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 Chrysler'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. In compiling its response to this Request, FCA US separated responsive reports into two categories: 1) those reports that relate to the Alleged Defect in the Subject Vehicles; and 2) those reports that may relate to the Alleged Defect in the Subject Vehicles. An allegation was reported under the "May Relate To" category if it involved a Subject Vehicle and the Subject Component, but lacked sufficient information as to whether it in fact was related to the Alleged Defect. Information related to these two categories of reports comprises FCA US' responses to subparts (a) through (f) of this Request. That information is located in ENCLOSURE 02 titled PE19-011_REPORTS.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. **Chrysler'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. **Seating position (driver, passenger or both)**
- 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 TWO DATA."

A3. FCA US' responses to subparts (a) through (m) of this Request are located in ENCLOSURE 03 and titled PE19-011_REQUEST NUMBER TWO DATA.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 Chrysler used for organizing the documents. Describe in detail the search methods and search criteria used by Chrysler 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 by using information such as vehicle model, model year, and a word search using

words reasonably related to the reports sought by this IR. The keyword search criteria used in this search are included in Table 2, which is located in ENCLOSURE 04 and titled PE19-011_TABLE 2 – Q2 KEYWORD SEARCH CRITERIA.pdf. 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 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, legal claims, legal summaries and field reports. The customer complaint summaries are submitted in a file titled PE19-011_CONSUMER AND CUSTOMER COMPLAINTS.pdf and the related documents are arranged in folders by complaint number. Legal summaries are contained in a file titled PE19-011_LEGAL SUMMARIES.pdf and the associated backup is arranged in folders by claimant name. Field reports are contained in a file titled PE19-011_FIELD REPORTS.pdf.

5. **State, by model and model year, a total count for all of the following categories of claims, collectively, that have been paid by Chrysler 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. **Chrysler'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);**
- 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."

- A5. FCA US' responses to subparts (a) through (n) are located in ENCLOSURE 05 and titled PE19-011_WARRANTY DATA.accdb.

- 6. Describe in detail the search methods and search criteria used by Chrysler 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 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 Chrysler 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 Chrysler 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.

- A6. In order to identify the claims detailed in response to Request No. 5, FCA US searched the normal repositories of information potentially responsive to this request, utilizing part numbers. A listing of the part numbers used for this search is located in ENCLOSURE 06 and titled PE19-011_TABLE 3 – SERVICE PART NUMBERS_CONF BUS INFO.pdf. All claims returned utilizing the identified part numbers were then searched using keywords. The keyword search criteria can be found in ENCLOSURE 06 and titled PE19-011_TABLE 4 – WARRANTY KEYWORD SEARCH CRITERIA.pdf. All warranty claims determined to be potentially responsive based on this keyword search have been provided in FCA US' response to Request No. 5. FCA US did not conduct a manual review in an effort to determine or otherwise identify which claims relate to, or which may relate to, the Alleged Defect. Similarly, FCA US did not attempt to remove any false positive keyword search hits from these potentially responsive claims.

Labor operations, labor operation descriptions, problem codes, problem code descriptions, part numbers and part number descriptions potentially related to Alleged Defect are contained in the correspondingly titled columns in the database located in ENCLOSURE 05 and titled PE19-011_WARRANTY DATA.accdb. There are no DTCs associated with the Alleged Defect.

New vehicle warranty coverage offered by FCA US on the Subject Vehicles 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/100,000 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 06 and titled PE19-011_SERVICE CONTRACTS_CONF BUS INFO.pdf.

- 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 Chrysler 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 Chrysler is planning to issue within the next 120 days.

A7. FCA US has conducted a reasonable and diligent search of the normal repositories of information potentially responsive to this Request and has not identified any responsive documents.

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, Chrysler. 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.

A8. FCA US' responses to subparts (a) through (f) of this Request are located in ENCLOSURE 08 and are summarized in the chart titled PE19-011_ACTIONS SUMMARY_CONF BUS INFO.pdf. Copies of related documentary information are included within ENCLOSURE 08.

9. Describe all modifications or changes made by, or on behalf of, Chrysler 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 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 Chrysler is aware of which may be incorporated into vehicle production within the next 120 days.

A9. FCA US' responses to subparts (a) through (h) of this Request are located in ENCLOSURE 09 and titled PE19-011_CHANGE HISTORY_CONF BUS INFO.pdf.

10. State the number of each of the following that Chrysler 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 Chrysler 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 Chrysler is aware that contain the identical component, whether installed in production or in service, and state the applicable dates of production or service usage.

A10. FCA US' response to this Request is located in ENCLOSURE 10 and titled PE19-011_PART SALES_CONF BUS INFO.pdf, PE19-011_SUPPLIER INFORMATION.pdf and PE19-011_IDENTICAL COMPONENT USAGE_CONF BUS INFO.pdf.

11. Furnish Chrysler'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;**
- 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; and**
- f. **The reports included with this inquiry.**

A11. 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 has concluded that there is no unreasonable risk to motor vehicle safety with respect to the Alleged Defect in the Subject Vehicles. The basis of FCA US' conclusion is discussed below.

First and most importantly, a review of both FCA US' internal data and the associated VOQs confirms that there is not a single injury or fatality associated with the Alleged Defect. Given the size and age of the Subject Vehicle population, which includes over 875,000 Subject Vehicles, with the majority

now between four and seven years in service (see FCA US' response to Request No. 1), this is a compelling data point that confirms FCA US' assessment of the Alleged Defect.

Apart from the lack of any injury or fatality in connection with the Alleged Defect, a close review of the same FCA US internal data further supports FCA US' assessment. The rate of occurrence of the Alleged Defect, expressed in terms of Conditions per 1000 Vehicles ("C/1000"), is and always has been low. The C/1000 associated with the Subject Vehicle population as a whole is 0.43. This was calculated based on 375 unique complaints in the total Subject Vehicle population of 875,486 vehicles.

FCA US' investigation of the Alleged Defect revealed important design and manufacturing process differences across the Subject Vehicle population. As such, FCA US determined that the complaint and field incidents identified in Response to Request No. 2 are best analyzed as a function of when the underlying vehicles were built. This analysis thus ranges from the start of production of the 2013MY Subject Vehicles in April 2012 through the end of production of the 2015MY in December 2015.

FCA US' analysis of the production of the Subject Vehicles over this 45-month period (i.e., from April 2012 to December 2015) revealed four sequential production date ranges punctuated by a series of production changes and/or improvements. Based on FCA US' analysis, the particular changes and/or improvements introduced during these Periods have a direct bearing on the complaints that FCA US received related to the Alleged Defect. The four Periods identified by FCA US are:

1. **April 2012 – June 2013 ("Period 1"):** This Period covers the beginning of production of the 2013MY Subject Vehicles, which began in April 2012, through June 2013. During this Period, FCA US equipped the Subject Vehicles with D-rings (part of the Subject Component) with nylon-based plastic overmolding.
2. **July 2013 – September 2014 ("Period 2"):** The beginning of this Period follows FCA US' June 2013 implementation of a change in which D-rings were manufactured using Celcon UV90Z plastic instead of nylon-based plastic. This change was implemented to lower the friction surface on the D-ring, which helps to reduce the shoulder load and chest compression seen by the occupant in a crash. The change was not a response to any complaints received regarding the Alleged Defect.
3. **October 2014 – July 2015 ("Period 3"):** The D-ring supplier introduced an important process improvement in mid-September 2014. The supplier added moisture control materials to the resin itself, and introduced humidity controls in the plant following the discovery of open bags of resin that were exposed to the environment. The supplier previously did not have adequate moisture control measures in place. Exposure of raw resin to excessive moisture can create significant porosity in the overmold.
4. **August 2015 – end of 2015MY production ("Period 4"):** As part of a running change introduced beginning in June/July 2015, the Subject Component was produced using a different material, Delrin 127UV. Although both the Delrin and Celcon materials were appropriate for this D-ring application in the Subject Component, the Delrin material performed better in subsequent

thermal shock testing. Delrin also provides added tensile strength, increased flexural modulus, and higher Charpy impact test scores.

For the purposes of this analysis, each of the 375 Subject Vehicle Conditions (from 364 unique VINs) identified in FCA US' Response to Request No. 2 was assigned to one of these four Periods based on the relevant Subject Vehicle's build date. The resulting four groups created through this assignment process (i.e. of a particular Subject Vehicle to one of the four Periods) are referred to as "Groups" in this Response. Figure 1 below summarizes FCA US' analysis in creating the four Groups.

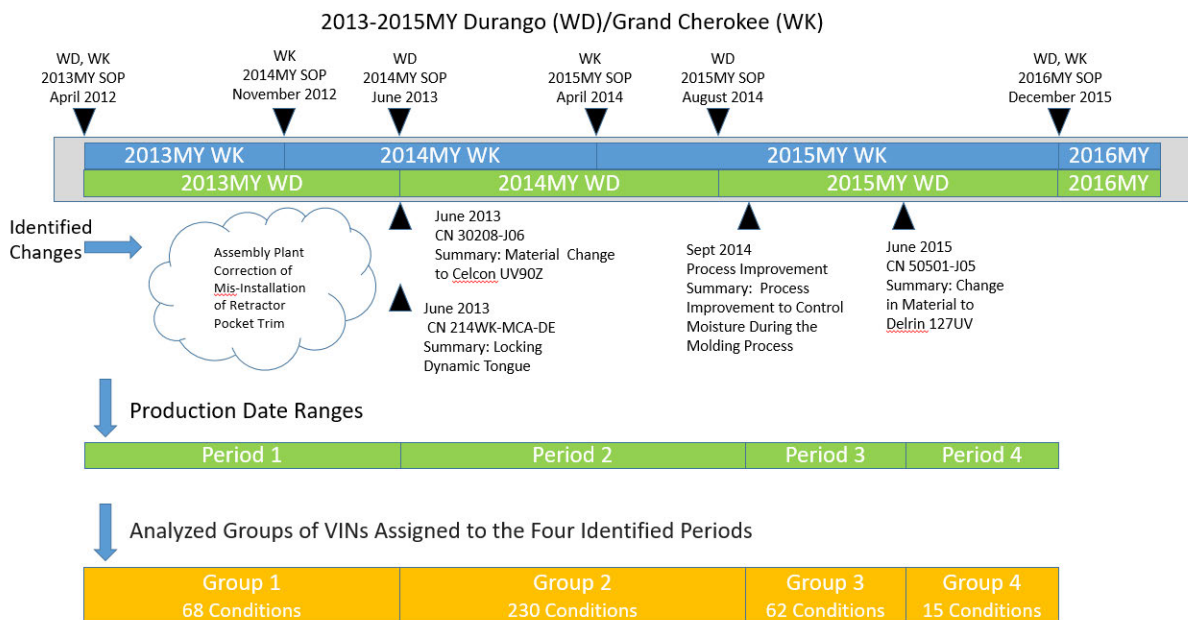


Figure 1

An analysis of FCA US' field complaint data made possible by the creation of these four Groups follows below. That analysis supports FCA US' conclusion that the Alleged Defect does not pose an unreasonable risk to motor vehicle safety. Turning first to a comparative review of the four Groups, Figure 2 below shows the cumulative C/1000 for each Group.

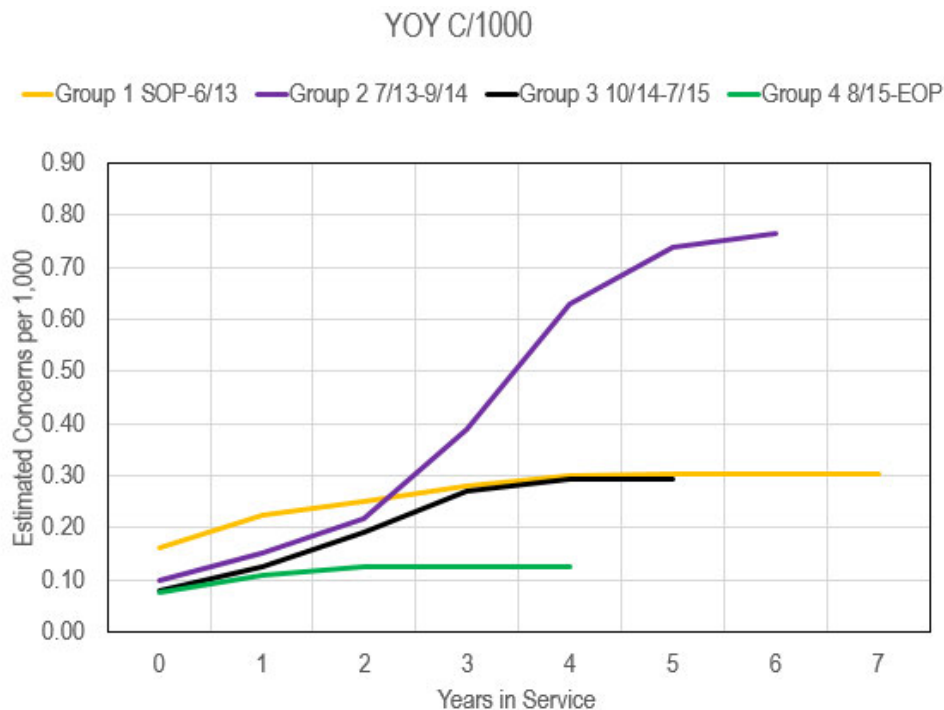


Figure 2

It is important to note that the C/1000 shown above are cumulative. With that in mind, FCA US offers several observations.

- First, as of the date of this Response, cumulative C/1000 for the four Groups at maximum time in service available are: Group 1 - 0.30; Group 2 - 0.76; Group 3 - 0.29; and Group 4 - 0.13. Group 2's C/1000 is higher in comparison to the C/1000 for each of the other three Groups. FCA US provides its assessment of Group 2 below, and explains why Subject Vehicles built in Period 2 do not pose an unreasonable risk to motor vehicle safety.
- The C/1000 rate of change over time is approaching zero, indicating that FCA US is receiving significantly fewer additional field complaints regarding the Alleged Defect relative to the Subject Vehicle population manufactured in the corresponding Period.
- Group 1's C/1000 starts higher than the corresponding rates for the other Groups. This reflects a manufacturing/assembly issue, described below.

- Group 2 shows an increase in C/1000 after 2 years in service. A trend of this sort can be indicative of a durability issue. FCA US addresses this below as well.

Turning to each of the Subject Vehicle Groups, FCA US offers the following assessments. For each Group, FCA US provides an analysis of the C/1000 as a function of the years in service of the Subject Vehicles in that Group. For the purposes of this analysis, a particular vehicle's service life at the time of the report is calculated based on its warranty start date. Warranty start date provides the most accurate means of estimating the beginning of a particular vehicle's service life since some Subject Vehicles were not sold immediately following production.

Group 1: C/1000 rates derived from the complaints associated with Group 1, plotted as a function of vehicle service life, are shown in Figure 3 below.

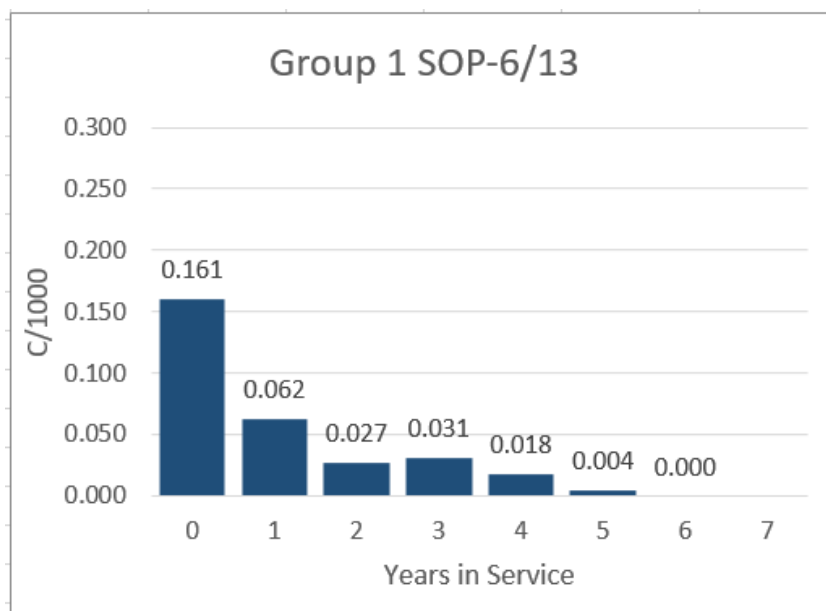


Figure 3

The trend illustrated by the declining C/1000 over increasing service life illustrated in Figure 3 demonstrates that, after some early life retraction issues, any complaint with the Alleged Defect in Group 1 has long since run its course. Early life issues frequently are indicative of a manufacturing or assembly issue, and that is exactly what FCA US' investigation revealed here. Specifically, FCA US learned that the front retractor shield was not properly seated within the B-Pillar in certain of the Group 1 Subject Vehicles. This installation issue could cause the Front Retractor Shield to come into contact with the seat belt webbing, resulting in slow seat belt retraction, which explains the early life complaints

More recently, however, complaints have flat-lined. FCA US has not received any complaints in 2019, and has only received a total of four complaints over the past three years, two in 2017 and two in 2018. Given the age of the Subject Vehicles in this population, 94% of which already have achieved

six full years of service, the declining trend of complaints is well established. Given this trend, FCA US concludes that the Subject Vehicles manufactured during Period 1 (i.e., from April 2012 through June 2013) do not pose an unreasonable risk to motor vehicle safety.

Group 2: Beginning in mid-June 2013, D-rings in the Subject Components were manufactured with Celcon overmolding. As discussed above, an inspection revealed exposure of the raw resin used in the molding process to ambient humidity conditions at the plant, which did not initially have sufficient moisture control measures in place. The resulting exposure could cause porosity in the overmold that, in turn, may have led to cracking in some parts.

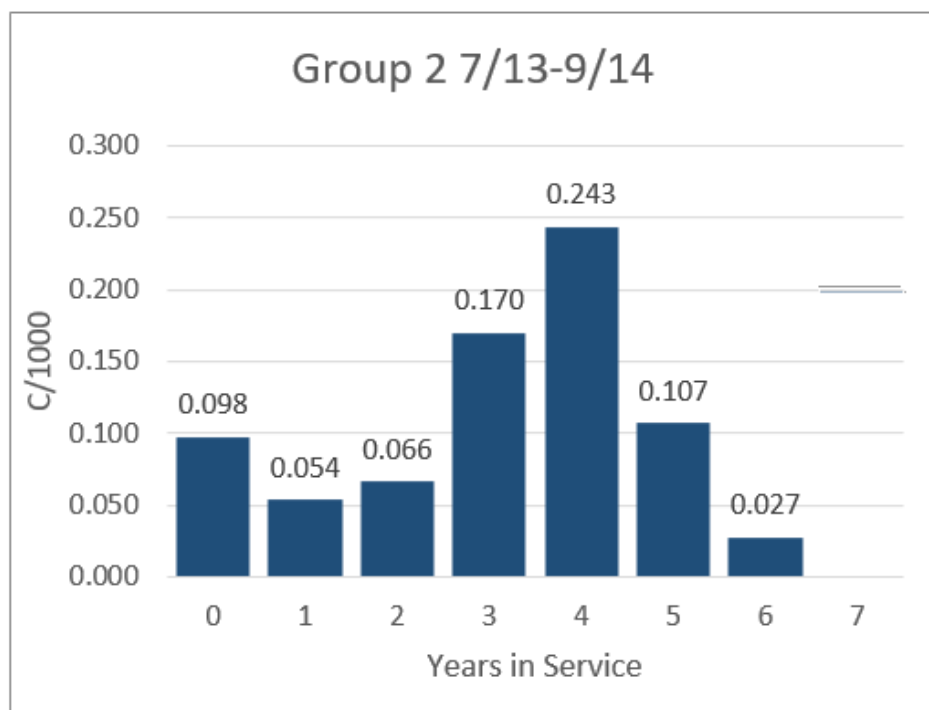


Figure 4

While these process issues are reflected in the C/1000 shown in Figure 4 above, FCA US still concludes that the durability issue reflected in this data does not pose an unreasonable risk to motor vehicle safety for the following reasons.

First, C/1000 appears to have reached its apex at four years in service, which over 99% of the Subject Vehicles manufactured during this Period have attained. While C/1000 increased between three- and four-years-in-service (from 0.17 to 0.24), C/1000 declined more than 50% in the fifth year in service (from 0.24 to 0.11). Given that 85% of the Subject Vehicles have reached five years in service, this decline is based on a mature data set.

Second, the Subject Components installed in these Subject Vehicles were equipped with dynamic locking tongues. These tongues are designed to limit the forward displacement of the pelvis and

improve occupant kinematics. They operate through a cam that cinches down on the webbing when the forces in the lap portion of the belt exceed the forces in shoulder/torso portion of the belt. This design ensures operation of the lap portion of the belt even if the Alleged Defect were present, inhibiting full or partial retraction of the shoulder belt.

Third, FCA US notes the overt nature of the Alleged Defect. Failure of the belt to retract, or slow or partial retraction, would be apparent to the consumer, who would have an opportunity to have his/her vehicle repaired. The complaint narratives support the overt nature of the Alleged Defect.

Fourth, the potential exposure to moisture during Period 2 cannot be expected to affect the entire Period 2 Subject Vehicle population equally. Differences in how the Celcon resin was stored, how long it may have been exposed, and when resin was used to make any particular run of parts will affect the porosity that may have led to increased complaints represented in this Group. The Alleged Defect will not manifest in all parts produced in Period 2.

Finally, FCA US reiterates that there have been no accidents, injuries or fatalities associated with the Alleged Defect. The significance of this data point cannot be overstated, particularly given the size and age of the Subject Vehicle population manufactured during Period 2. Specifically, FCA US' records indicate 317,750 Subject Vehicles were built in Period 2, between June 2013 and August 2014. More than 99% of those Subject Vehicles have passed the four years-in-service mark, and 85% have entered their fifth full year in service, and some even have registered six full years-in-service. **Taken together, the 317,750 Subject Vehicles built during this Period have amassed a combined 1,578,650 cumulative years in service without a single injury or fatality attributed to the Alleged Defect. Assuming the nationwide average of approximate 12,000 miles driven per year, this equates to nearly 19 billion miles without an Alleged Defect-related injury or fatality.** This is a powerful affirmation of FCA US' conclusion that Group 2 does not indicate the presence of an unreasonable risk to motor vehicle safety.

Group 3: Beginning in September 2014, FCA US' supplier implemented controls in its overmolding processes, including moisture controls added to the raw resin used to make the D-ring plastic overmolding. Humidity controls also were introduced in the overmolding plant. A C/1000 chart for Group 3, shown below, reflects the efficacy of these measures, which are lower than the corresponding rates for each comparable year-in-service for Group 2.

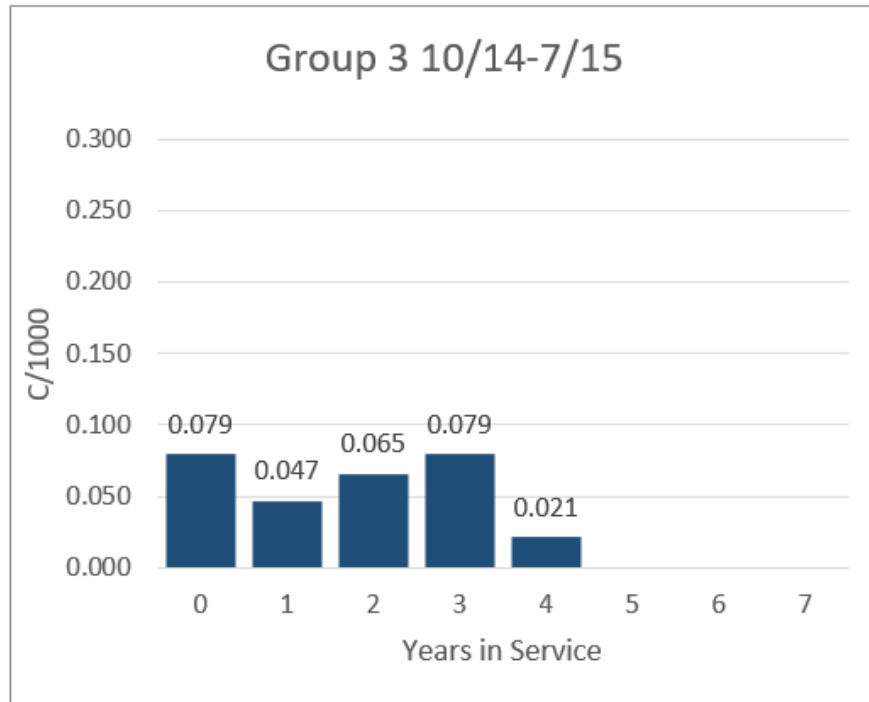


Figure 5

As with the other Groups, C/1000 data generally reflects a decline in complaints. Between three and four years-in-service, C/1000 fell 75%, from 0.08 to 0.02. Since 88% of the Period 3 Subject Vehicle population has passed that four-year mark, this data point is mature and indicative of the actual declining trend.

Group 4: C/1,000 associated with the Group 4 Subject Vehicles manufactured with Delrin plastic overmolded D-rings are the lowest of all four Groups, as illustrated in Figure 6 below.

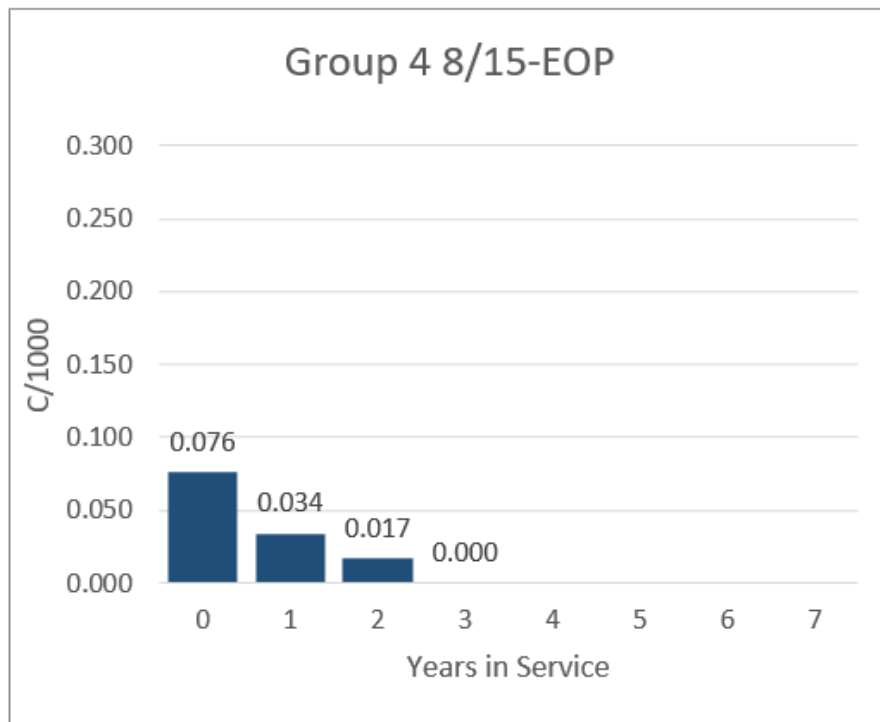


Figure 6

It is important to note that FCA US identified a total of just 15 complaints attributable to the Alleged Defect in Subject Vehicles manufactured in Period 4, which consists of more than 118,000 vehicles. FCA US has not received any complaints related to the Period 4 vehicles in 2019, and only two were received in 2018. The Alleged Defect with respect to Subject Vehicles manufactured during this timeframe does not pose an unreasonable risk to motor vehicle safety.

* * *

FCA US notes that it has reviewed the 18 VOQs provided by the Agency (16 of which provided VIN information) in conjunction with this IR. A review of those 16 VOQs indicates that all of those vehicles would have been assigned to Group 2 based on their build dates. FCA US found through this review that the complaints raised in the VOQs are representative of those reflected in its own complaint databases, such that the conclusions reached above are fully applicable to the vehicles represented in those VOQs.

Based on this assessment, and its comprehensive review of the relevant records described above, FCA US concludes that the Alleged Defect does not pose an unreasonable risk to motor vehicle safety. In summary, Period 1 data review showed early life manufacturing complaints that are no longer occurring. Subject Vehicles built in Period 2 reflect a low and declining complaint rate and the

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potential safety impact is mitigated by the dynamic locking tongue and the overtness of the condition. Data for Periods 3 and 4 show even lower complaint rates and declining trends. FCA US respectfully requests the Agency to close this investigation.

PE19-011 2013-2015 MY Jeep Grand Cherokee (WK) and Dodge Durango (WD) Vehicles "Relate To" Reports

The total reflected in sub-parts (a), (b), (e) and (f) below make up the total number of reports identified. FCA US notes that sub-parts (a) through (f) are not cumulative.

Model Year	a	b	c			d	e	f
	Consumer Complaints	Field Reports	Crash	Injury	Fatality	Property Damage	3rd Party Arbitration	Lawsuit/Legal Claims
2013-2015 WK	64	1	0	0	0	0	0	2
2013-2015 WD	13	1	0	0	0	0	0	0
Unique VINs (2013-2015 MY)	67	2	0	0	0	0	0	2

PE19-011 2013-2015 MY Jeep Grand Cherokee (WK) and Dodge Durango (WD) Vehicles "May Relate To" Reports

The total reflected in sub-parts (a), (b), (e) and (f) below make up the total number of reports identified. FCA US notes that sub-parts (a) through (f) are not cumulative.

Model Year	a	b	c			d	e	f
	Consumer Complaints	Field Reports	Crash	Injury	Fatality	Property Damage	3rd Party Arbitration	Lawsuit/Legal Claims
2013-2015 WK	240	10	0	0	0	0	0	5
2013-2015 WD	74	6	0	0	0	0	0	1
Unique VINs (2013-2015 MY)	281	15	0	0	0	0	0	6

A document titled
PE19-011_TABLE 1 – PART NUMBERS_CONF BUS INFO.pdf was
SUBMITTED TO THE NHTSA OFFICE OF CHIEF COUNSEL WITH A
REQUEST FOR CONFIDENTIAL TREATMENT