

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 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. 09-50002).

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 August 17, 2020, the date this Information Request ("IR") was received.

This attachment contains FCA US' response to the IR issued in Investigation PE20-012, as clarified with Scott Yon of the National Highway Traffic Safety Administration's ("NHTSA") Office of Defects Investigation ("ODI") on August 21, 2020 and September 23, 2020.

- The term "Subject component" as used in the IR is defined as the USB charge hub located in the panel between the second and third row seating of the vehicle.
- The term "Fire Report" as used in the IR is defined as Fire Reports from Fire Departments.
- In response to Request No. 1, subpart (e), FCA US will provide a separate table containing the FCA US USB charge hub part number(s) for the Subject Vehicles by Model Year.

1. **State, by model and model year, the number of subject vehicles containing the subject component that FCA has manufactured for sale or lease in the United States. Separately, for each subject vehicle manufactured to date by FCA, 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 PE20-012_PRODUCTION DATA.accdb. The response for subpart (e) of the Request is located in **ENCLOSURE 01** and titled PE20-012_TABLE 1 – PART NUMBERS_CONF BUS INFO.pdf.

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;**
 - 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/f" 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 alleged an interior fire where an origin has not otherwise been identified, but lacked sufficient information to determine whether it in fact was related to the Alleged Defect in the Subject Component. 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** and titled PE20-012_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. 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. Vehicle's VIN;
 - e. Vehicle's make, model and model year;
 - f. Vehicle's mileage at time of incident;
 - g. Incident date;
 - h. Report or claim date;
 - i. Whether a crash is alleged;
 - j. Whether the fire occurred when the ignition key was turned off;
 - k. Whether the vehicle was occupied when the fire occurred;
 - l. Whether any of the subject components ports were being used, or were connected to at the time of the fire;
 - m. Whether there was an occupant located in the second or third row;
 - n. Whether the vehicle was in motion at the time the fire occurred;
 - o. Whether FCA inspected the vehicle post incident;
 - p. Whether FCA has determined the origin of the fire;
 - i. If so, provide the origin;
 - q. Whether FCA has determined the cause of the fire;
 - i. If so, provide the cause of the fire;
 - r. Whether a fire department responded;
 - s. Whether a fire report was filed;
 - t. Whether property damage (other than the vehicle itself), including damage to a physical structure (house, building, parking garage, etc.) is alleged;
 - u. Number of alleged injuries, if any; and
 - v. 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 (v) of this Request are located in **ENCLOSURE 03** and titled PE20-012_REQUEST NUMBER TWO DATA.accdb.

FCA US notes that an incident referenced in a group of related CAIRs (33847745, 33594874, 33595074, 33615132 and 33743857) and Legal Matters (1311388 and 1310230) in PE20-012_REQUEST NUMBER

TWO DATA.accdb in **ENCLOSURE 03** refer to the same incident involving the same vehicle; the information appears as two separate VINs as a result of a typographical transposition in the source data.

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.**

- 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 PE20-012_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**. The customer complaint summaries are submitted in a file titled PE20-012_CONSUMER AND CUSTOMER COMPLAINTS.pdf and the related documents are arranged in corresponding folders by complaint number. FCA US notes that, due to file size constraints, photograph files have been compressed. FCA US will provide high resolution files to NHTSA upon request. Legal summaries are contained in a file titled PE20-012_LEGAL SUMMARIES.pdf and the related documents are arranged in corresponding folders by claimant name. Field reports are contained in a file titled PE20-012_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 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), 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) of this Request are located in **ENCLOSURE 05** and titled PE20-012_WARRANTY DATA.accdb.

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, 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 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.

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 service part numbers. A listing of the part numbers used for this search is located in **ENCLOSURE 01** and titled **PE20-012_TABLE 1 – PART NUMBERS_CONF BUS INFO.pdf**. An eyes-on review of the search results were then conducted to determine whether each returned record relates to, or may relate to, the Alleged Defect.

Labor operations, labor operation descriptions, problem codes, problem code descriptions, part numbers and part number descriptions potentially related to the Alleged Defect are contained in the correspondingly titled columns in the database located in **ENCLOSURE 05** and titled PE20-012_WARRANTY DATA.accdb.

New vehicle warranty coverage offered by FCA US on the Subject Vehicles is located in **ENCLOSURE 06** and titled PE20-012_NEW VEHICLE WARRANTY.pdf.

Extended warranty and service contract coverage option(s) that FCA US offers on 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 PE20-012_SERVICE CONTRACTS_CONF BUS INFO.pdf.

FCA US notes that Diagnostic Trouble Code (“DTC”) information is not normally captured as part of the warranty system record for any particular claim. While these codes occasionally may be available if the technician manually enters them into the narrative field in the relevant database, technicians are not required to do so, and as such DTC information cannot be extracted automatically.

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.**
- 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, FCA. 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 PE20-012_ACTIONS SUMMARY_CONF BUS INFO.pdf. Copies of responsive documentary information is included within **ENCLOSURE 08**.
9. **Describe all modifications or changes made by, or on behalf of, FCA 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 FCA 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 PE20-012_CHANGE HISTORY_CONF BUS INFO.pdf. As FCA US' investigation into the Alleged Defect is ongoing, FCA US includes in its response all changes to the subject component of which it is aware at this time.
- 10. 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;
 - 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 reports included with this inquiry.
- A10. FCA US initiated an investigation after having received a report from NHTSA regarding an allegation of an interior fire originating at or near the Subject Component in a Subject Vehicle.

FCA US is in close contact with the Agency regarding the status of the investigation, sharing technical details about the functionality of the Subject Component, and reviewing FCA US' assessment of the VOQ reports referenced in the IR. FCA US' investigation is ongoing as of the date of this response. Below, FCA US provides updated information regarding the Subject Component and the status of its investigation.

BACKGROUND

The Subject Vehicle population includes 512,250 MY 2013 to MY 2020 Chrysler Town and Country and Dodge Grand Caravan vehicles equipped with a dual USB charge-only port (designated by FCA US Sales Code RS3) in a media hub located in the left-rear quarter trim panel between the second and third row seats. In addition to the dual USB charge ports, the media hub includes several ignition-fed auxiliary connections, an ignition-fed 12V charging port, a 115V outlet receptacle, and an optional HDMI connection. Images of the media hub showing the RS3 USB charge port within the Subject Vehicle are shown below.

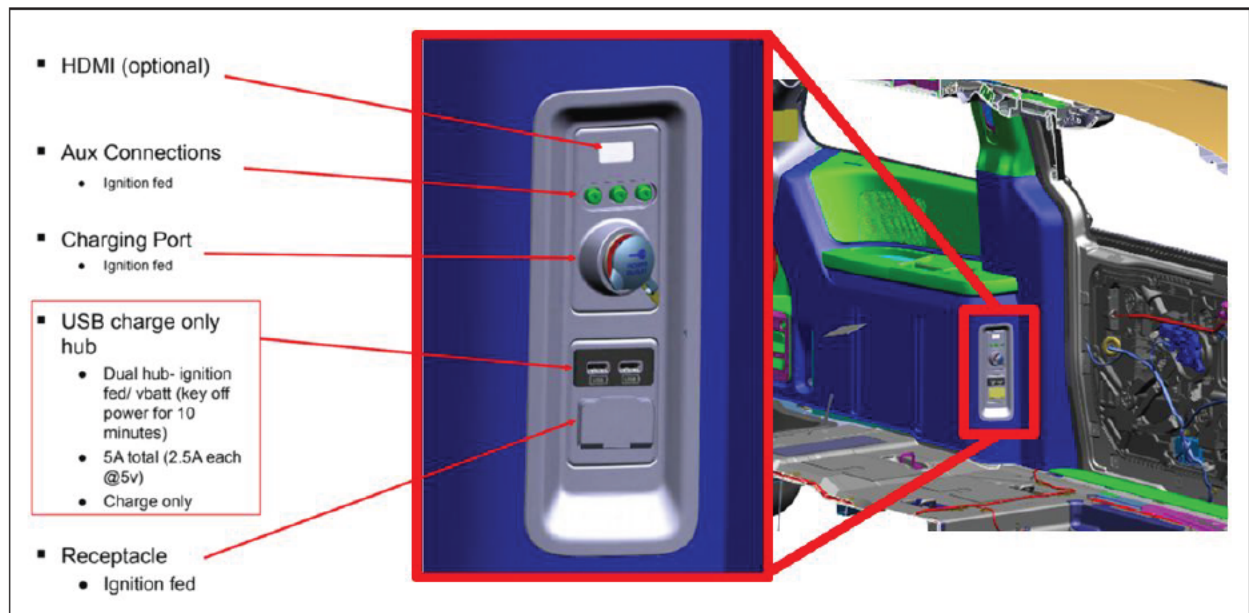


Figure 1: media hub

The USB charge ports are IPX2 water resistant, IPX3 access protection tested, and IP5KX dust resistant and feature input circuit protection through the use of capacitors.

A circuit diagram depicting the fusing strategy employed for the USB charge hub is located in **Enclosure 08** in a file titled Q8_00003_CONF BUS INFO.pdf.

FCA US' ONGOING INVESTIGATION

As described above, FCA US initiated an investigation into the Alleged Defect related to the Subject Components in the Subject Vehicles after having received a report from NHTSA. Through this investigation, FCA US identified other reports which are related to or may be related to the Alleged Defect in the Subject Vehicles. In connection with one of those reports, FCA US performed a vehicle inspection showing evidence of a high resistance short on the printed circuit board ("PCB") of the USB port. Based on that input, FCA US began investigating multiple root causes potentially related to the observed failure mode, including, among others, (1) the presence of solder dendrites that form through the corrosion of the resin-based solder material; (2) the formation of crystalline filaments sometimes known as "wire whiskers"; (3) solder balls created during the soldering process; and (4) the intrusion of a conductive fluid into the USB charge hub. Hypothetically, each of these potential root causes could lead to a high resistance short. In addition to the testing being conducted by FCA US, the supplier of the USB charge port performed simulated conductive fluid and harness connection (to simulate terminal pushout or poor harness-to-module connection) testing on the Subject Component.

FCA US notes that these simulated tests introduce failure modes that may not be present in the population.

FCA US' investigation is ongoing. The investigation continues to obtain Subject Component parts from the field. In addition, FCA US engaged its internal Black Belt group to conduct a study of the Alleged Defect in the Subject Vehicles.

FCA US has analyzed the complaint and warranty data provided in response to Requests Nos. 2 and 5 of this IR. Though this analysis is ongoing, two important observations are clear. First, though the Subject

Vehicles include RT vehicles from MY 2013 through present, FCA US records indicate that there have been no claims or reports regarding the Subject Vehicle population after the 2016 Model Year. Second, incident rates expressed in conditions per 1,000 vehicles ("C/1000") associated with the Alleged Defect are objectively low. The cumulative C/1000 rate is 0.078 C/1000 for all Subject Vehicles (512,250 vehicles). The cumulative C/1000 for just the MY 2013 through MY 2016 Subject Vehicle population (475,737 vehicles) is 0.084.

As stated above, FCA US has reviewed the four VOQ reports referenced in the IR with NHTSA and will continue to study them in conjunction with its ongoing investigation.

FCA US will continue to work closely with NHTSA and will share the progress of its ongoing investigation.