

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"). Subsequent to December 15, 2014, FCA US has undergone no further name change, and remains FCA US.

This attachment contains FCA US' response to the Information Request ("IR") issued in Investigation PE21-010, as clarified with Kevin Miller of the National Highway Traffic Safety Administration's ("NHTSA") Office of Defects Investigation ("ODI") on August 13, 2021.

- This response is from FCA US as this is the entity from which information is being requested.
- The Subject Vehicles are limited to 2020-2021 Model Years, consistent with the subject of this IR.
- For subpart (e) of Request 1, ODI agrees to define the information requested as the part number and design version of the airbag module that uses the subject component.
- The term "Design Version" as used in the IR is defined as the inflator design version.
- For subpart (a) of Request 10, ODI agrees to define the parts requested as the airbag module that uses the subject component.
- Exemplar parts, referenced in Request 10, have been sent directly to NHTSA at the address provided.
- This response, and its related files and information will be sent electronically via a NHTSA provided SFTP link.

Note: This document does not contain information after August 3, 2021, the date this IR was received.

1. **State, by model and model year, the number of subject vehicles that FCA has manufactured for sale or lease in the United States. Separately, for each subject vehicle manufactured to date by Stellantis, 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. **Name of supplier of original equipment part;**
 - g. **Date of manufacture;**
 - h. **Date warranty coverage commenced; and**
 - i. **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 (g) through (i) of this Request are located in ENCLOSURE 01 and titled PE21-010_PRODUCTION DATA.accdb. The response for subparts (e) and (f) of the Request is located in ENCLOSURE 01 and titled PE21-010_TABLE 1 – PART NUMBERS_CONF BUS INFO.pdf.**

2. **State the number of each of the following, received by Stellantis, or of which Stellantis 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. **Reports involving a fire;**
 - e. **Property damage claims;**
 - f. **Third-party arbitration proceedings where Stellantis is or was a party to the arbitration; and**
 - g. **Lawsuits, both pending and closed, in which Stellantis is or was a defendant or codefendant.**

For subparts “a” through “g” 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 “g” provide a summary description of the alleged problem and causal and contributing factors and Stellantis’s assessment of the problem, with a summary of the significant underlying facts and evidence. For items “f” and “g” 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 and has not identified any responsive information.
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. **Stellantis'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 a fire 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 has conducted a reasonable and diligent search of the normal repositories of information potentially responsive to this Request and has not identified any responsive information.
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 Stellantis used for organizing the documents. Describe in detail the search methods and search criteria used by Stellantis to identify the items in response to Request No. 2.**
- A4. Documents potentially 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 **PE21-010_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.

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 information.

5. State, by model and model year, a total count for all of the following categories of claims, collectively, that have been paid by Stellantis 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. Stellantis'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 has conducted a reasonable and diligent search of the normal repositories of information potentially responsive to this Request and has not identified any responsive information.

6. Describe in detail the search methods and search criteria used by Stellantis 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 how long the diagnostic trouble code is stored in the system, where it is stored and if it is deleted is there any history that would indicate it was previously active.

State, by make and model year, the terms of the new vehicle warranty coverage offered by Stellantis 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 Stellantis 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 potentially related to this information request, FCA US searched the normal repositories of information potentially responsive to this Request utilizing a part number search. A listing of the part numbers used for this search is located in **ENCLOSURE 01** and titled **PE21-010_TABLE 1 – PART NUMBERS_CONF BUS INFO.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. FCA US has not identified any Labor Operation or DTC codes which are specifically applicable to the Alleged Defect in the subject vehicles.

New vehicle warranty coverage offered by FCA US on the Subject Vehicles is located in **ENCLOSURE 06** and titled **PE21-010_NEW VEHICLE WARRANTY.pdf**.

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 **PE21-010_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 Stellantis 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 Stellantis 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 information.
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 vehicle that have been conducted, are being conducted, are planned, or are being planned by, or for, Stellantis. 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 **PE21-010_ACTIONS SUMMARY_CONF BUS INFO.pdf**. Copies of responsive documentary information are included within **ENCLOSURE 08**.
9. **Describe all modifications or changes made by, or on behalf of, Stellantis 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 Stellantis is aware of which may be incorporated into vehicle production within the next 120 days.**
- A9. 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 information.
10. **Produce two of each of the following:**
- a. Exemplar samples of each design version of the subject component;
 - b. Field return samples of the subject component exhibiting the alleged defect taken from vehicles with a manufacture date prior to January 1, 2021; and
 - c. Any kits that have been released, or developed, by Stellantis for use in service repairs to the subject component/assembly which relate, or may relate, to the alleged defect in the subject vehicles.
- A10. Consistent with the clarification of Request 10(a) by Kevin Miller as referenced above, FCA US has shipped airbag module assemblies ("kits") that have been released for use in both service repairs and production, which contain exemplar samples of each design version of the subject component. Information related to the part numbers sent and tracking information is located in **ENCLOSURE 10** and titled **PE21-010_EXEMPLAR PARTS_CONF BUS INFO.pdf**. FCA US notes one of the part numbers is on backorder and will be shipped when available, estimated Q3-2021. FCA US has not identified any field return samples of the subject component exhibiting the alleged defect taken from vehicles with a manufacture date prior to January 1, 2021.

11. State the number of each of the following that Stellantis 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:

- a. Subject component; and
- b. Any kits that have been released, or developed, by Stellantis 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 Stellantis is aware that contain the identical component, whether installed in production or in service, and state the applicable dates of production or service usage.

- A11. a. FCA US does not make available for sale the subject component.
- b. FCA US' responses to this Request are located in **ENCLOSURE 11** and titled **PE21-010_PART SALES_CONF BUS INFO.pdf**, **PE21-010_SUPPLIER INFORMATION.pdf** and **PE21-010_IDENTICAL COMPONENT USAGE_CONF BUS INFO.pdf**.

12. Furnish Stellantis'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; 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; and
- f. The reports included with this inquiry.

- A12. Based on the lack of information responsive to this Information Request, FCA US has concluded that there is no unreasonable risk to motor vehicle safety with respect to the Alleged Defect in the Subject Vehicles.