

Mr. Bruce York

ATTACHMENT

Reference: NEF-102ig; PE21-016

October 14, 2021

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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. [REDACTED]).

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

This attachment contains FCA US' response to the IR issued in Investigation PE21-016, as clarified with Mr. Bruce York of the National Highway Traffic Safety Administration's ("NHTSA") Office of Defects Investigation ("ODI") on September 1, 2021, September 21, 2021 and October 5, 2021.

- This document does not contain information after August 19, 2021, the date FCA US received the original Information Request ("IR") letter.
- FCA US is not including Continuous Quality Insight ("CQI") survey results with the response to this inquiry.
- Exemplar parts, referenced in request 11 will not be provided.

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 this Request are located in **ENCLOSURE 01** and titled **PE21-016_PRODUCTION DATA_SUBJECT.accdb** and **PE21-016_PRODUCTION DATA_PEER.accdb**

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. In compiling its response to this Request, FCA US separated responsive reports into two categories for both subject and peer vehicles: 1) those reports that relate to the Alleged Defect in the Subject Component; and 2) those reports that may relate to the Alleged Defect. An allegation was reported under the "May Relate To" category if it alleged inadequate or noisy operation of the sliding door, but lacked sufficient information to determine whether it in fact was related to the Subject Component. Information related to these two categories of reports comprises FCA US' responses to subparts (a) through (g) of this Request. That information is located in **ENCLOSURE 02** and titled **PE21-016_REPORTS_SUBJECT.pdf** and **PE21-016_REPORTS_PEER.pdf**.

Per the conversation between NHTSA ODI and FCA US on September 21, 2021, CQI survey results were not included with the response to this inquiry. An example of the survey is located in **ENCLOSURE 02** and titled **CQI_Example.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. **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 property damage is alleged;**
 - k. **Number of alleged injuries, if any; and**
 - l. **Number of alleged fatalities, if any.**
 - m. **Whether consumer(s) was able to get the door opened or took it to service to have it opened.**
 - n. **Whether consumer(s) noticed any acoustic sound, buzzing noise before sliding door(s) failed to open.**
 - o. **Whether the power sliding door was stuck shut, what actions consumer took to try and get the door to open**
 - i. **Did the consumer(s) try to manually open from inside/outside by pulling the handle;**
 - ii. **Did the consumer(s) press the key fob button to open the door;**
 - iii. **Did the consumer(s) try the open/close button inside the cabin next to the powersliding door;**
 - p. **When consumer tried to open the sliding door(s), was the key in ignition/OFF,ACC,RUN or doors locked/unlocked**

Provide this information in Microsoft Access 2010, or a compatible format, entitled "REQUEST NUMBER TWO DATA."

- A3. FCA US' responses to subparts (a) through (p) of this Request are located in **ENCLOSURE 03** and titled **PE21-016_REQUEST NUMBER TWO DATA_SUBJECT.accdb** and **PE21-016_REQUEST NUMBER TWO DATA_PEER.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 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. 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 1, which is located in **ENCLOSURE 04** and titled **PE21-016_TABLE 1 – 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 files titled **PE21-016_CONSUMER AND CUSTOMER COMPLAINTS_SUBJECT.pdf** and **PE21-016_CONSUMER AND CUSTOMER COMPLAINTS_PEER.pdf** and the related documents are arranged in corresponding folders by complaint number. Legal summaries are contained in files titled **PE21-016_LEGAL SUMMARIES_SUBJECT.pdf** and **PE21-016_LEGAL SUMMARIES_PEER.pdf**. Field reports are contained in files titled **PE21-016_FIELD REPORTS_SUBJECT.pdf** and **PE21-016_FIELD REPORTS_PEER.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 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. **Replacement part number(s) and description(s);**

- j. **Concern stated by customer;**
- k. **Cause as stated on the repair order;**
- l. **Correction as stated on the repair order; and**
- m. **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 (m) of this Request are located in **ENCLOSURE 05** and titled **PE21-016_WARRANTY DATA_SUBJECT.accdb** and **PE21-016_WARRANTY DATA_PEER.accdb**.

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.**

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 a part number search with wildcards (wildcard indicated by %) within the subject and peer vehicle populations. The part numbers used for this search were 05020678A% and 05020679A%. FCA US did not conduct an eyes on review of the warranty claims returned through this search, and is providing all warranty records returned.

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 **PE21-016_WARRANTY DATA_SUBJECT.accdb** and **PE21-016_WARRANTY DATA_PEER.accdb**.

7. **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.**

A7. New vehicle warranty coverage offered by FCA US on the Subject Vehicles is located in **ENCLOSURE 07** and titled **PE21-016_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 07** and titled **PE21-016_SERVICE CONTRACTS_CONF BUS INFO.pdf**.

Furthermore, FCA US notes a Warranty Extension Field Action for Magna lock actuators in 2015 through 2017 MY Town & Country and Dodge Grand Caravan vehicles built between May 1, 2015, and January 1, 2017, was approved. The Warranty Extension is for 15 years/150,000 miles.

8. **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.**

A8. FCA US' responses to this Request are located in **ENCLOSURE 08**.

9. **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.

A9. FCA US' responses to subparts (a) through (f) of this Request are located in **ENCLOSURE 09** and are summarized in the chart titled **PE21-016_ACTIONS SUMMARY_CONF BUS INFO.pdf**. Copies of responsive documentary information are included within **ENCLOSURE 09**.

10. **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.

A10. FCA US' responses to subparts (a) through (h) of this Request are located in **ENCLOSURE 10** and titled **PE21-016_CHANGE HISTORY_CONF BUS INFO.pdf**.

11. 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.

A11. Per the October 5, 2021, discussion and agreement between FCA US and NHTSA ODI, FCA US will not provide exemplar parts in response to this request.

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

A12. FCA US' response to this Request is located in **ENCLOSURE 12** and titled **PE21-016_PART SALES_CONF BUS INFO.pdf**, **PE21-016_SUPPLIER INFORMATION.pdf** and **PE21-016_IDENTICAL COMPONENT USAGE_CONF BUS INFO.pdf**.

- 13. Identify any other vehicle models that were manufactured with the same or substantially similar lock actuator assembly as the subject and peer vehicles.**
- A13. FCA US' response to this Request is located in **ENCLOSURE 13** and titled **PE21-016_SIMILAR COMPONENT USAGE_CONF BUS INFO.pdf**
- 14. Identify and provide contact information for any manufacturers of the subject component.**
- A14. FCA US' response to this Request is located in **ENCLOSURE 12** and titled **PE21-016_SUPPLIER INFORMATION.pdf**.
- 15. 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; and**
 - f. The reports included with this inquiry**
- A15. 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.

Assessment:

In response to customer complaints, FCA US' Technical Safety and Regulatory Compliance ("TSRC") Department first investigated sliding door operation related to the Subject Component in August through November of 2019. The conclusion of that investigation was that the door operation failure mode described in the analyzed complaints does not present an unreasonable risk to motor vehicle safety and the safety investigation was closed accordingly.

Subsequent to the closure of the TSRC Investigation, the FCA US Quality Department conducted an analysis of potentially relevant warranty claims for consideration of a potential Quality Field Action. The investigation led to the discovery that the actuator housing dimensions fell out of specification causing reduced gear engagement between the motor work gear and the output gear, see figure 1. This allows excess play in the system leading to the potential for gear binding and/or a stripped gear. This was corrected by a refurbishment of the lock actuator housing tool (November 2016) followed by a new tool (November 2018). The suspect

period affected some 2015 through 2017 MY vehicles which were built between May 1, 2015, and January 9, 2017.

Magna, FCA US' supplier of the Subject Component, began supplying sliding door lock actuator assemblies for installation on Chrysler Town and Country and Dodge Grand Caravan vehicles beginning with the 2008 Model Year. Since this introduction, more than five million lock actuator assemblies have been installed on FCA US vehicles built for sale or lease in the United States, included, but not limited to, the District of Columbia, and current U.S. territories and possessions. Prior to production, Magna met FCA US' rigorous performance standards.

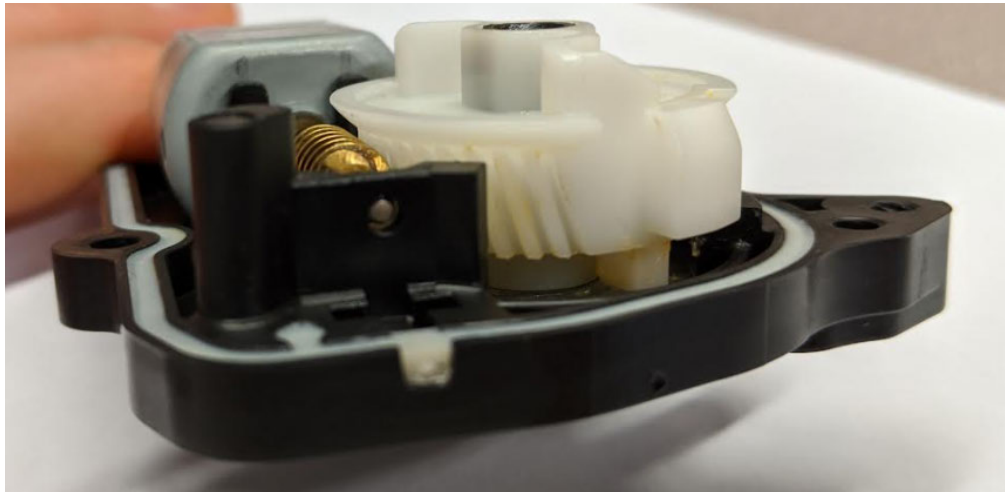


Figure 1

FCA US has conducted additional analysis of the Alleged Defect in the context of this Information Request. Upon this additional review of the data provided in response to the Requests above and the VOQs provided by NHTSA in conjunction with this IR, FCA US has determined that its prior conclusions were correct and that there is no unreasonable risk to motor vehicle safety with respect to the Alleged Defect in the Subject Vehicles. The basis for FCA US' determination is discussed in detail below.

FCA US' conclusion that the Alleged Defect does not pose an unreasonable risk to motor vehicle safety is grounded in data-driven analysis. A more complete description of the analysis follows. The subject, and peer, vehicles related to this information request are equipped with a total of five ingress/egress points as demonstrated in **Figure 2**, below. FCA US identified a tooling issue with the subject component that may create a mechanical failure and therefore is not likely to manifest on both doors simultaneously. FCA US analysis confirmed 83% of the consumer complaints included with this inquiry indicated a concern with a single door and one-third of these complaints mention the cost of the repair. FCA US' analysis of complaints, potentially related to the alleged defect, indicated that, in many cases the vehicle operator experienced some level of noise prior to failure of the subject component, indicating an issue.



Figure 2

According to the opening resume summary: "The complainants express concern that in the event of an emergency or crash, if the sliding door (s) cannot be opened, it could trap passengers or delay their egress." Based on FCA US' analysis and understanding of the alleged defect, an assessment was conducted to analyze the chance of injury with both a single and two simultaneous sliding door lock actuator failures occurring at the same time. Injury rates per 100,000 were summed for the last five available years (2014 - 2018 CY) and divided by 100,000 to get a 5-year individual risk. This was then multiplied by the likelihood of having one or two doors simultaneously inoperative based on responsive record review. The chance of this happening is extremely low and is described in detail in information submitted to NHTSA with a request for confidential treatment on June 18, 2021, and titled **20210614 Meeting-CONF BUS INFO.pdf**.

The best evidence, however, that the operation of the sliding door does not actually pose an unreasonable risk to motor vehicle safety is the dearth of real world field incidents. The suspect vehicle build population has been on the road since 2015 MY with more than 14 billion estimated miles driven with zero crashes, zero injuries and zero fatalities associated with the alleged defect.

FCA US found through this review that the complaints raised in the VOQs provided with this Information Request 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. FCA US strongly believes the Alleged Defect does not pose an unreasonable risk to motor vehicle safety. FCA US, however, does want to maintain customer satisfaction by addressing customer quality concerns. For this reason, FCA US' Quality Department took this issue forward and a Warranty Extension Field Action for Magna lock actuators in 2015 through 2017 MY Town & Country and Dodge Grand Caravan vehicles built between May 1, 2015, and January 1, 2017, was approved. The Warranty Extension is for 15 years/150,000 miles.

For the reasons set forth in FCA US' response to this IR, especially given there have been **over 14 billion estimated miles driven with zero crashes, zero injuries and zero fatalities associated with the alleged defect**, FCA US respectfully requests the Agency to close this investigation.