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Jennifer Shute
Director, Technical Safety and Regulatory
Compliance

November 3, 2021

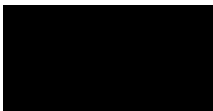
Mr. Gregory Magno
U.S. Department of Transportation
National Highway Traffic Safety Administration
1200 New Jersey Avenue SE
Washington, D.C. 20590

Reference: NEF-0104; PE21-020

Dear Mr. Magno:

Enclosed is the response of FCA US LLC (“FCA US”) to the September 13, 2021, Information Request issued in the above-referenced investigation. This constitutes FCA US’s full response to this Information Request.

Sincerely,



Jennifer Shute
Director, Technical Safety and Regulatory Compliance

Attachment and Enclosures

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 PE21-020, as clarified with Gregory Magno of the National Highway Traffic Safety Administration’s (“NHTSA”) Office of Defects Investigation (“ODI”) on September 8, 2021.

- This response is from FCA US as this is the entity from which information is being requested.

The Subject Vehicles and Subject Systems are defined below:

Vehicle	System Name	Designation
2021 MY Jeep Grand Cherokee L	Active Driving Assist	Level 2, Hands on
2020-2021 MY Alfa Romeo Giulia/Stelvio	Highway Assist	
2020-2021 MY Alfa Romeo Giulia/Stelvio	Traffic Jam Assist	

Note: This document does not contain information after September 13, 2021, the date this IR was received.

1. **State, by model and model year, the number of subject vehicles STELLANTIS has manufactured for sale or lease or operation in the United States. Separately, for each subject vehicle manufactured to date by STELLANTIS, state the following:**
 - a. **Vehicle identification number (VIN);**
 - b. **Model;**
 - c. **Model Year;**
 - d. **Subject component trade / trim name, part number and design version installed as original equipment; including:**
 - i) **Software version;**
 - ii) **Firmware version;**
 - iii) **Hardware version;**
 - e. **Date of manufacture;**
 - f. **Date warranty coverage commenced;**
 - g. **The State in the United States where the vehicle was originally sold or leased (or delivered for sale or lease);**
 - h. **Latest known vehicle mileage and commensurate date;**
 - i. **Cumulative mileage covered with the subject system engaged; and**
 - j. **Date and identities of the most recent software, firmware, and hardware updates.**

Provide the table in Microsoft Access 2010, or a compatible format, entitled "PRODUCTION DATA."

- A1. FCA US' responses to subparts (a) through (c) and (e) through (h) of this Request are located in **ENCLOSURE 01** and titled **PE21-020_PRODUCTION DATA.accdb**. The response for subpart (d) of the Request is located in **ENCLOSURE 07** and titled **PE21-020_REQUEST NUMBER SEVEN_CONF BUS INFO.pdf**. For subparts (i) and (j) FCA US notes that this information is not available within the FCA US systems.

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 subject system in the subject vehicles:**
 - a. **Consumer Complaints;**
 - b. **Field Reports;**
 - c. **Reports involving a subject crash, injury or fatality;**
 - d. **Property damage claims;**
 - e. **Third-party arbitration proceedings where STELLANTIS is or was a party to the arbitration; and**
 - f. **Lawsuits, both pending and closed, in which STELLANTIS 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 "e" and "f", 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 "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. Information related to these reports comprises FCA US' responses to subparts (a) through (f) of this Request. That information is located in **ENCLOSURE 02** and titled **PE21-020_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. 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 model and model year;
 - f. Vehicle's mileage at time of incident;
 - g. Software, firmware, and hardware versions in place at the time of the incident, along with vehicle and mileage and date of installation;
 - h. Incident date;
 - i. Report or claim date;
 - j. Whether a crash is alleged;
 - k. Description of the crash including:
 - i) Time of day and local time zone;
 - ii) Crash site coordinates (latitude and longitude);
 - iii) Listing of involved vehicles, objects and persons;
 - iv) Speed and direction of the subject vehicle;
 - v) Documented subject vehicle driver impairment;
 - vi) Location / orientation of the subject vehicle in relation to other involved vehicles, objects, persons at the time of impact;
 - vii) Timing of subject system engagement / disengagement over the 30 second period leading to the subject crash and, if not:
 - (1) Description and timing of driver control inputs that may have overridden the subject system;
 - viii) Description of the intervention of:
 - (1) crash warning or avoidance systems (e.g., AEB, FCW)
 - (2) subject system logic intended to detect first responder vehicles / scenes on or off the roadway;
 - l. Description and timing of the last driver engagement warning prior to the subject crash;
 - m. Duration (minutes) and distance (miles) of the drive cycle that led to the subject crash;
 - n. Whether property damage is alleged;
 - o. Number of alleged injuries, if any; and
 - p. 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 this Request are located in **ENCLOSURE 03** and titled **PE21-020_REQUEST NUMBER TWO DATA.accdb**. FCA US notes that the information for subpart (g) of this request is not available within FCA US systems.

4. **Produce copies of all documents, telematics reports / data, and data logs 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.**

In addition, provide a full copy of any expert report that has been produced by STELLANTIS or received from another party in a lawsuit, arbitration, or a pre-suit claim regarding the incidents identified in Request Number 2. This includes any reports produced or exchanged for experts designated by any party in such litigation, including STELLANTIS, plaintiff(s), or co-defendants. This does not include reports that STELLANTIS has never produced to another party, to the extent STELLANTIS claims a privilege exists for such a report.

- A4. Documents potentially related to each item within the scope of Request No. 2 were gathered by using Subject Vehicle model, model year, and Subject System sales codes. An eyes-on review of all records returned was then conducted to determine whether each returned record relates to the Subject System in the Subject Vehicles.

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 **PE21-020_CONSUMER AND CUSTOMER COMPLAINTS.pdf** and the related documents are arranged in corresponding folders by complaint number. Field reports are contained in files titled **PE21-016_FIELD REPORTS.pdf** and the related documents are arranged in corresponding folders by field report number.

5. **For each trade name / trim level of the subject system available in the subject vehicles, state its name and designation including:**
 - a. **Describe the ODD specified to the customer by STELLANTIS for the intended use of the system, including but not limited to:**
 - i) **Types of roads, road marking, weather conditions, etc. the system is intended to be used on and the types of roads on which the system should not be used;**
 - ii) **List the methods and technologies used to prevent subject system usage outside the ODD specified to the customer by STELLANTIS; and**
 - iii) **If the subject system can be engaged (or remain engaged) outside of the ODD specified to the customer by STELLANTIS, state the reasons for this capability and describe any performance restrictions or modifications to the subject system's operational characteristics in such an environment (e.g. slower maximum speeds or control authority, additional driver warnings, adjustments to the driver engagement system).**
 - b. **Describe the subject system's maximum control authority over steering (steering angle (degrees), rate (degrees / sec), lateral acceleration (g)), braking (g), and acceleration (g) functions during routine and crash-imminent operations. Separately include any additional conditions and control authority values that STELLANTIS deems appropriate.**
 - c. **List and describe the information, system status, alerts, warnings, and graphics communicated by the subject vehicle to its driver during the DDT (e.g., warning lights, instrument panel animations, aural warnings, haptic warnings) during the following subject system operational conditions:**
 - i) **Routine subject system operation;**
 - ii) **Scenarios where the vehicle requires driver intervention (e.g., driver engagement needed, imminent ODD exit, system fault); and**
 - iii) **When the subject vehicle detects that a crash is imminent.**
 - d. **Furnish an overview of STELLANTIS's approach to the enforcement of driver engagement / attentiveness during the subject system's operation in the subject vehicles. Include a description of all means of detecting (both through direct measurement and inference) /**

- monitoring driver engagement / attentiveness including:
- i) The technological means and related logic (including direct measurement or inference) used to sense driver engagement / attentiveness;
 - ii) Minimum contact or detected engagement duration and time between contact / detected engagement required to satisfy the driver engagement / attentiveness logic including changes based on variations in driving conditions such as vehicle speed or presence of a lead vehicle;
 - iii) Describe any warning strategies or messaging and timing associated with each system identified above in subpart (ii) (include pictures/videos of all audible & visual warnings/alerts); and
 - iv) Describe any escalation or lockout strategies used to address either unresponsive drivers or repeated engagement warnings in any given drive cycle.
- e. Describe subject system responses to driver control inputs that could cancel or override one or more of its Level 2 functions. For each driver input, include:
- i) Driver input description and minimum threshold (e.g., minimum steering angle or rate);
 - ii) List the Level 2 functions disabled and permitted to continue operation following a driver override;
 - iii) Describe / illustrate warnings and messages to the driver concerning the system status following a driver override; and
 - iv) Explain which, if any, of the disabled Level 2 functions resume operation on their own after the override input and under what conditions.
- f. List the conditions / events / alerts that may prompt an operating subject system to require a “take-over” by the driver. For each such condition, list:
- i) Sequence of events and timing for each; and
 - ii) Intended vehicle behavior in the instance where a driver take-over is not detected.
- g. Describe the subject system OEDR capabilities within the ODD specified to the customer by STELLANTIS. List the objects and events that the system is designed to detect (e.g., particular vehicle aspects, pedestrians, road signs, drivable space limitations, environmental (weather / road surface / lighting) conditions, path predictions, object classifications). For each item, list:
- i) Subject system behavior;
 - ii) Limitations on detection; and
 - iii) Subject system interaction with crash avoidance technologies.

A5.

Vehicle	System Name	Designation
2021 MY Jeep Grand Cherokee L	Active Driving Assist (“ADA”)	Level 2, Hands on
2020-2021 MY Alfa Romeo Giulia/Stelvio	Highway Assist	
2020-2021 MY Alfa Romeo Giulia/Stelvio	Traffic Jam Assist	

Response to subpart (a):

The Subject Systems described in this response are Level 2 ADAS systems that require the driver to keep their hands on the steering wheel at all times. These systems are driver’s convenience systems and are not a substitute for driver involvement. The driver must remain aware of traffic conditions and maintain control of the vehicle.

FCA US provides a thorough description of the Subject Systems in the Owner’s Manuals for the Subject Vehicles. Copies of these Owner’s Manuals are included in **ENCLOSURE 05**. Below is a table that identifies

the Subject Vehicle, the file name for its corresponding manual and the pages in the manual which describe the ODD specified to the customer by FCA US for the intended use of the system.

MY	Vehicle	File Name	Pages
2020	Alfa Romeo Giulia	P112615_20_GA_OM_EN_USC_DIGITAL.pdf	34, 95, 102, 173-180, 182-188
2020	Alfa Romeo Stelvio	P112920_20_GU_OM_EN_USC_DIGITAL.pdf	35, 99, 108, 176-183, 185-192
2021	Alfa Romeo Giulia	P122879_21_GA_OM_EN_USC_E1_V1.pdf	16, 28, 82, 105-112, 113-119
2021	Alfa Romeo Stelvio	P121442_21_GU_OM_EN_USC_DIGITAL.pdf	16, 28, 83, 109-116, 117-124
2021	Jeep Grand Cherokee L	P130856_21_WL_OM_EN_USC_DIGITAL.pdf	109-110, 139-147, 150-153

Response to subpart (b):

REDACTED

[REDACTED]

[REDACTED]

[REDACTED]

Response to subpart (c):

During routine operation the Subject System communicates to its driver during the DDT with the following:

Permanent telltale graphic or selectable full screen display and (optional) heads up display showing:

- Current Vehicle speed
- Adaptive Cruise Control (“ACC”) set speed
- Detected speed limit (if Traffic Sign Assist is present on the vehicle)
- Target vehicle icon is displayed if ACC detects another vehicle in your lane within range
- ACC “time gaps” showing desired distance to the vehicle ahead
- Lane lines which show green when the system is engaged, and flash yellow when the vehicle crosses a lane marking
- Active Driving Assist (“ADA”), Highway Assist and Traffic Jam telltale (steering wheel) showing system status (green, yellow, red, grey)
- Secondary Visual Indication cluster glow (“SVI”) showing system status (green, yellow, red, off) for ADA, Highway Assist and Traffic Jam Assist. In particular, when the ADA feature is engaged
- LEDs on the left and right edges of the instrument cluster.
- Steering wheel vibration (if configured in radio head unit) when the vehicle crosses a lane marking
- Popup text messages when the feature is engaged:
 - Adaptive Cruise Control Ready
 - ADA Ready

In driving scenarios that require driver intervention, such as a system fault that prevents the subject system from continuing to operate, the system will ramp out the steering torque request and close the interface, switching to the OFF state. At this point the system will inform the driver with a chime and popup text message stating “ACC/Active Driving Assist Unavailable Service Required.” If the ACC system is still operational it will not disengage. If a fault occurs in the ACC system, both ACC and Lane Centering will be disabled.

- Popup text messages when the feature is cancelled (either automatically or by driver action), for example:
 - Active Driving Assist Cancelled - Lane Detection Limited + Chime (chime is only issued when vehicle speed is above 30 mph)
 - Active Driving Assist Cancelled (no reason given). Ex. Lane crossed, driver override detected, brake pedal pressed, cancel button pressed, seatbelt unbuckled, door opened, etc.
 - Active Driving Assist Cancelled - Speed too high

Additionally, when the system has detected that the radius of curvature of the road ahead is too tight or that the current filtered lateral acceleration of the vehicle is greater than its designed threshold, the system will provide a full screen text warning stating “Curve too tight, take control of vehicle” along with a red graphic of a curvy road and a single audible chime. This warning also consists of Red cluster indications (Secondary Visualization Indication (“SVI”), telltale). The red SVI and telltale will remain present until the curve ends or until the feature is deactivated (example video located in **ENCLOSURE 05**).

When the Subject Vehicle detects that a crash is imminent, the Subject System will deactivate and the AEB system will perform its normal sequence of warning and braking.

Response to subpart (d):

The primary method of detecting driver engagement is via a capacitive touch sensing mat embedded in the rim of the steering wheel. This sensor updates **REDACTED** with status on whether the driver’s hands are in contact with the wheel. The capacitive touch sensor is intended to be calibrated such that the condition

is satisfied with 2 fingers and 1 thumb for a 5th percentile female. However, the capacitive touch sensing material does not have full coverage of the steering wheel rim, and due to the presence of stitching seams in the leather, or styling elements (plastic, wood, etc) it may require extra hand contact to trigger the sensor.

When the Subject Vehicle does not detect a hand on the steering wheel, the system begins a series of escalating warnings (visual, audible, haptic) before cancelling the lateral and longitudinal control features. Descriptions of the escalation logic, strategy and exemplar photos can be found in the enclosed summary, owner's manuals and video located in **ENCLOSURE 05**. There are no lockout strategies used for the Subject System, as the intended use requires driver engagement via a hands on strategy.

Response to subpart (e):

Subject System responses to driver control inputs that could cancel or override one or more of its Level 2 functions include:

- Brake pedal pressed (Longitudinal)
- Turn indicator activated & no vehicle detected in the blind spot area on the same side as the indicator (Lateral)
- Steering column torque greater than minimum threshold (Lateral)
- Steering angle greater than minimum threshold (Lateral)
- Steering angle rate of change greater than minimum threshold (Lateral)

Lateral control overrides (ex. torque, angle, angle speed, turn indicator) will deactivate the lateral control system but not the longitudinal control system. Once the engagement conditions are met for the lateral control system, it will automatically re-engage. These include:

- Hands on wheel
- Lane markings detected
- Vehicle centered in lane
- Vehicle heading angle within tolerance

Longitudinal control overrides (ex. brake pedal pressed) will deactivate both the lateral control system and the longitudinal control system. In this situation, the system will not automatically resume operation without driver inputs. If a lateral or longitudinal override is performed, the system will show a text message popup "Active Driving Assist Cancelled" and the lane lines and ADA telltale will turn grey and the SVI will turn off.

Response to subpart (f):

The following table outlines conditions / events / alerts that may prompt an operating Subject System to require a "take-over" by the driver.

Condition	Event	Alert
Hands off wheel detected	See ENCLOSURE 05 as referenced in subpart (d)	
Loss of forward path confidence	System cancelled	Lane Detection Limited
System fault	System unavailable	Service Required
Vehicle Speed too high	System cancelled	Speed too High
Tight curve	System cancelled	Curve too tight, take control of vehicle

Response to subpart (g):

FCA US specifies to the customer information related to the subject system OEDR capabilities within the ODD, including subject system behavior and system limitations on detection, in the owner's manual. The sections are outlined in the following table:

MY	Vehicle	File Name	Pages
2020	Alfa Romeo Giulia	P112615_20_GA_OM_EN_USC_DIGITAL.pdf	34, 95, 102, 173-180, 182-188
2020	Alfa Romeo Stelvio	P112920_20_GU_OM_EN_USC_DIGITAL.pdf	35, 99, 108, 176-183, 185-192
2021	Alfa Romeo Giulia	P122879_21_GA_OM_EN_USC_E1_V1.pdf	16, 28, 82, 105-112, 113-119
2021	Alfa Romeo Stelvio	P121442_21_GU_OM_EN_USC_DIGITAL.pdf	16, 28, 83, 109-116, 117-124
2021	Jeep Grand Cherokee L	P130856_21_WL_OM_EN_USC_DIGITAL.pdf	109-110, 139-147, 150-153

The Subject System will deactivate when the AEB system detects that a crash is imminent and perform its normal sequence of warning and braking.

6. **Produce copies of all instructional, service, warranty, marketing, and other documents that relate to, or may relate to, the operation of each trade name / trim level of the subject system in the subject vehicles, that STELLANTIS has issued to any customers, 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, digital messages on a subject vehicle display, 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.**
- A6. FCA US' responses to this Request are located in **ENCLOSURE 06**.
7. **For each trade name / trim level of the subject system available in the subject vehicles, describe all modifications or changes made by, or on behalf of, STELLANTIS in the design, material composition, manufacture, quality control, supply, function, or installation of the subject system, from the start of production to date, which relate to, or may relate to driver engagement / attentiveness and OEDR by the subject system 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 hardware, firmware, and software names and numbers of the original version;**
 - e. **The hardware, firmware, and software names and numbers of the modified version;**
 - f. **Primary distribution method of related firmware and software updates (over the air or in-person service); and**
 - g. **When the modified version / update was made available as a service component.**

Also, provide the above information for any modification or change that STELLANTIS is aware of which may be incorporated into vehicle production or pushed to subject vehicles in the field within the next 120 days.

A7. FCA US' responses to this Request are located in **ENCLOSURE 07** and titled **PE21-020_REQUEST NUMBER SEVEN_CONF BUS INFO.pdf**.

8. **Describe STELLANTIS's strategies for detecting and responding to the presence of first responder / law enforcement vehicles and incident scene management tactics whether in or out of the roadway during subject system operation in the subject vehicles. Include:**

- a. **Incident scene detection (particularly flashing lights, road flares, cones / barrels, reflectorized vests on personnel, vehicles parked at an angle "fend-off" position);**
- b. **Explain the effects of low light conditions on these strategies; and**
- c. **List subject system behaviors (e.g., driver warnings, control interventions).**

A8. The Active Driving Assist ("ADA"), Highway Assist and Traffic Jam Assist systems have no specific logic that detects an incident scene as described above. These systems are Level 2 ADAS systems that require the driver to keep their hands on the steering wheel at all times. These systems are driver's convenience systems and are not a substitute for driver involvement. The driver must remain aware of traffic conditions and maintain control of the vehicle.

The ADA, Highway Assist and Traffic Jam Assist systems will react to vehicles detected in the lane ahead, but will not react to stationary objects, and may not react to vehicles that are driving only partially in the lane (lateral offset).

The Automatic Emergency Braking ("AEB") system will react to pedestrians and stationary vehicles but has limitations on the deceleration and maximum speed reduction possible. AEB uses both camera and radar sensors. The camera detection performance is sensitive to many factors such as whether the target vehicle's tail lights are on. In general, the camera is sensitive to low light. The AEB system consists of a series of visual, audible and haptic warnings, followed by a braking intervention.

9. **Describe any processes, procedures, or policies governing the extent of testing and validation required prior to the release of the subject system or an in-field update to the subject system, including hardware and software components of such systems, identifying, in particular:**

- a. **The extent of field testing or vehicle validation miles required prior to the release of such a system or feature;**
- b. **The extent of any computer simulations or training data sets required to be conducted prior to the release of such a system or feature and the degree to which any such simulations are relied upon for testing and validation in lieu of field testing;**
- c. **The extent to which the processes, procedures, or policies for the testing and validation identified above differ, if at all, for updates to a subject system or feature (e.g. software updates) compared to the first release of the system or feature;**
- d. **The length of time that the processes, procedures, or policies for the testing and validation identified above have been in place; and**
- e. **Any processes, procedures, or policies in place to compare the performance of a subject system or feature in the field after a release with the design intent for the system or feature.**

A9.

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- 10. Describe STELLANTIS's processes for identifying and investigating subject crashes in the subject vehicles with the subject system in operation including:**
- a. Vehicle's Data collection/logging capabilities including vehicle's ability to wirelessly transmit data including:**
 - i) The conditions in which a vehicle may send wireless data that may relate to a subject crash;**
 - ii) The methods by which the data are sent (type of wireless system and location of involved components on the subject vehicles);**
 - iii) A description of the data sent and related alerting within STELLANTIS;**
 - iv) Any limitations on such transmittal (e.g. poor wireless connectivity, etc.);**
 - v) Countermeasures / alternate retrieval options when transmittal limitations apply;**
 - b. Procedures for investigating customer concerns or safety incidents; and**
 - c. Metrics used to assess safety performance.**
- A10. FCA US Subject Vehicles are not equipped with a system that sends wireless data that may relate to subject crashes in the subject vehicles with the subject system in operation. In response to the Standing General Order 2021-01 ("SGO") FCA US' TSRC will report any alleged incident as required in the SGO.
- 11. Furnish STELLANTIS's assessment of the impact of the subject system on the crashes furnished in response to Request 2, 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 they pose.**
- A11. The Subject Systems described in this response are Level 2 ADAS systems that require the driver to keep their hands on the steering wheel at all times. These systems are driver's convenience systems and are not a substitute for driver involvement. The driver must remain aware of traffic conditions and maintain control of the vehicle.

In response to the Standing General Order 2021-01 FCA US' Technical Safety and Regulatory Compliance ("TSRC") has conducted daily reviews to identify alleged crashes in vehicles equipped with L2 ADAS systems. As with this inquiry, FCA US has identified zero crashes, zero injuries and zero fatalities with the subject system engaged at any time during the period beginning 30 seconds immediately prior to the commencement of the crash. FCA US has concluded that there is no unreasonable risk to motor vehicle safety with respect to the Subject System in the Subject Vehicles.