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Director, Technical Safety and Regulatory
Compliance

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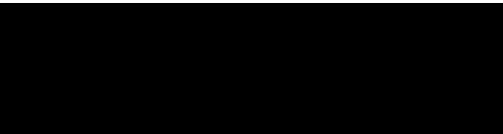
Mr. Bruce York
U.S. Department of Transportation
National Highway Traffic Safety Administration
1200 New Jersey Avenue SE
Washington, D.C. 20590

Reference: NEF-102; PE21-021

Dear Mr. York:

Enclosed is the response of FCA US LLC (“FCA US”) to the January 19, 2022, Information Request issued in the above-referenced investigation. This constitutes FCA US’s full response to this Information Request.

Sincerely,



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”).

This attachment contains FCA US’ response to the IR issued in Investigation PE21-021, as clarified with Mr. Bruce York of the National Highway Traffic Safety Administration’s (“NHTSA”) Office of Defects Investigation (“ODI”) in an email dated January 31, 2022 and a meeting that occurred on February 4, 2022.

- Peer Vehicles: As defined in the subject vehicle definition, FCA US will provide information on the peer vehicles that were manufactured for sale or lease in the United States, including, but not limited to, the District of Columbia, and current U.S. Territories and possessions.
- Request 1:
 - Subpart e: FCA US is unable to provide this information on a VIN level basis. FCA US will provide separate tables for Peer and Subject vehicles containing the part information.
 - Subpart g: FCA US does not have the date of manufacture of the subject component in its database, as the subject component is installed on the engine, by the engine supplier, prior to its assembly into the vehicle.
 - Subpart h: FCA US will provide the installation date of the subject component if it was replaced in a subsequent repair.
- Request 4: FCA US and NHTSA ODI clarified the term/phrase “or other components” referenced in request 4 of this information request letter to mean the application of the subject component.

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;**
 - f. **Date of manufacture of vehicle;**
 - g. **Date of manufacture of subject component;**
 - h. **Date of installation of subject component if not installed as original equipment;**
 - i. **Date warranty coverage commenced; and**
 - j. **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." A pre-formatted data collection file, which provides further details regarding this submission, will be provided to you.

- A1. **FCA US' responses to subparts a through d, f, i and j of this Request are located in ENCLOSURE 01 and titled PE21-021_PRODUCTION_DATA_SUBJECT.accdb and PE21-021_PRODUCTION_DATA_PEER.accdb. FCA US' responses to subparts e and g of this request for subject vehicles are located in ENCLOSURE 01 and titled PE21-021_SUBJECT – PART BUILD INFORMATION_CONF BUS INFO.xlsx. FCA US' responses to subparts e and g of this request for peer vehicles are located in PE21-021_PEER – PART NUMBERS_CONF BUS INFO.pdf.**
2. **Produce copies of all service, warranty, and other documents that relate to, or may relate to, the alleged defect in the subject and peer 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.**
- A2. **FCA US' responses to this Request are located in ENCLOSURE 02.**
3. **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 and peer vehicles that have been conducted, are being conducted, are planned, or are being planned by, or for, FCA or in conjunction with the component supplier or other party. Include all actions related NHTSA recalls 21V-880 and 21E-094. 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.

- A3. FCA US' responses to subparts (a) through (f) of this Request are located in **ENCLOSURE 03** and are summarized in the charts titled **PE21-021_ACTIONS SUMMARY_SUBJECT_CONF BUS INFO.pdf** and **PE21-021_ACTIONS SUMMARY_PEER_CONF BUS INFO.pdf**. Copies of responsive documentary information are included within **ENCLOSURE 03**.
4. **Describe all modifications or changes made by, or on behalf of, FCA or in conjunction with the component supplier or other party, in the design, material composition, manufacture, quality control, supply, functionality, or installation of the subject component or other components, from the start of production to date, which relate to, or may relate to, the alleged defect. 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.

- A4. FCA US' responses to subparts (a) through (h) of this Request are located in **ENCLOSURE 04** and titled **PE21-021_CHANGE HISTORY_SUBJECT_CONF BUS INFO.pdf** and **PE21-021_CHANGE HISTORY_PEER_CONF BUS INFO.pdf**.
5. **State the number of each of the following that FCA has sold that may be used in the subject and peer 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 a substantially similar component, whether installed in production or in service, and state the applicable dates of production or service usage.

- A5. FCA US' responses to this Request are located in **ENCLOSURE 05** and titled **PE21-021_SUBJECT_PART SALES_CONF BUS INFO.pdf**, **PE21-021_PEER_PART SALES_CONF BUS INFO.pdf**, and **PE21-021_SUPPLIER INFORMATION.pdf**. Model and Model Year of the parts are located in **ENCLOSURE 01** and titled **PE21-021_SUBJECT – PART NUMBERS_CONF BUS INFO.pdf** and **PE21-021_PEER – PART NUMBERS_CONF BUS INFO.pdf**. FCA US notes that the substantially similar components are other variants of the Bosch CP4 high pressure fuel pump (“HPFP”) not included in the vehicle and equipment recalls.

6. Furnish FCA's assessment of the alleged defect, 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. **Rationale for not recalling peer vehicles, if applicable; and**
- g. **The reports included with this inquiry.**

- A6. FCA US has reviewed the information provided in response to the Requests above and the VOQs provided by NHTSA in conjunction with this IR. FCA US' responses as to the subject and peer vehicles are listed below.

Subject vehicles

In response to customer complaints, FCA US' Technical Safety and Regulatory Compliance (“TSRC”) Department first investigated complaints related to failures in the CP4.2 HPFP on both subject and peer vehicles. At the time of this investigation, FCA US concluded that there was a significant amount of warning to the customer of the malfunction of the pump. The customers described the warnings as follows:

- No Start
- Long Crank
- Check Engine Light (“CEL”)
- “Whining” or “grinding” noise
- Water In Fuel Light
- Poor idle
- Limp Mode
- Abnormal engine sounds “missing” or skipping”

Due to the high level of detectability, and low failure rate at the time, the investigation was closed after committee review in February 2020.

In October of 2021, FCA US TSRC opened a follow up safety investigation related to the subject vehicles of this IR. This investigation further examined the use of the Bosch CP4.2 HPFP in the subject vehicles. On November 04, 2021, FCA US determined, through the Vehicle Regulations Committee, to conduct a voluntary safety recall of the affected vehicles and equipment.

FCA US provided its assessment with regard to the Alleged Subject Vehicle Defect in the Defect Information Report ("DIR") associated with NHTSA Recall Numbers 21V-880 (Vehicle) and 21E-094 (Equipment), originally submitted by FCA US on November 12, 2021, and as amended on December 16, 2021. As FCA US described in the vehicle DIR, the subject vehicles are equipped with a Cummins 6.7L Turbo Diesel engine with a suspect Bosch CP4.2 HPFP, subject component, which may fail and "introduce internally failed component debris into the fuel system potentially causing fuel starvation. Fuel starvation may result in an unexpected loss of motive power, which can cause a vehicle crash without prior warning."

The involved components identified in the vehicle recall were 6.7L Cummins Turbo Diesel engine assemblies, as the suspect Bosch CP4.2 HPFP is a component of the supplied engine. FCA US issued equipment recall 21E-094 simultaneously with the vehicle recall to capture suspect HPFPs and complete engine assemblies equipped with these suspect HPFPs from the field. FCA US notes that all vehicles which had a prior repair due to a failure of the Bosch CP4.2 HPFP, would also be included in the vehicle recall.

FCA US' remedy, in coordination with the engine supplier, is to replace the Bosch CP4.2 HPFP with a new HPFP design, update the Powertrain Control Module ("PCM") software, and inspect and, if necessary, replace additional fuel system components. FCA US and its engine supplier have removed the Bosch CP4.2 from production beginning with the 2021MY for vehicles equipped with a 6.7L Cummins Turbo Diesel engine.

FCA US has reviewed the VOQs included with this inquiry and found that all of the reports received were for vehicles included in the recall of the subject vehicles.

Peer vehicles

The peer vehicles to this IR are FCA US vehicles equipped with a Bosch CP4.2 HPFP. The only other application of this pump is the 3.0L V6 diesel engine. On February 9, 2022, FCA US expanded its read across investigation to conduct a thorough analysis of all data sources to understand the situation relative to the application of the use of the Bosch CP4.2 HPFP in these vehicles.

FCA US will maintain contact with the Agency regarding the status of the investigation. FCA US' investigation is ongoing as of the date of this response.