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 FCA. Pursuant to the sales transaction, FCA 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 FCA, 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, FCA changed its name to FCA US LLC ("FCA US").

1. State, by model and model year, the number of subject and peer vehicles 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 (17-character VIN);
b. Make;
c. Model;
d. Model Year;
e. Date of manufacture (MM/DD/YYYY);
f. Date warranty coverage commenced (MM/DD/YYYY); and
g. The State in the United States where the vehicle was originally sold or leased, or delivered for sale or lease (postal abbreviation).

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

A1. FCA US' responses to subparts a through g of this Request are located in **ENCLOSURE 01** and titled **PE22-013_PRODUCTION DATA.accdb**.

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 and peer 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; and
f. Third-party arbitration proceedings, both pending and closed, where FCA is or was a party to the arbitration; and
g. Lawsuits, both pending and closed, in which FCA is or was a defendant or codefendant.

For subparts "a" through "f/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 "f/g" 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/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. Responsive, non-privileged information identified through that

search comprises FCA US' responses to subparts (a) through (g) of this Request. That information is located in **ENCLOSURE 02** and titled **PE22-013_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), email address and telephone number (please use distinct fields for each data type);
d. Vehicle owner or fleet street address, city, state (postal abbreviation), and ZIP code (please use distinct fields for each data type);
e. Vehicle's 17-character VIN;
f. Vehicle's make, model and model year (please use distinct fields for each data type);
g. Vehicle's mileage at time of incident;
h. Incident date (MM/DD/YYYY);
i. Report or claim date (MM/DD/YYYY);
j. Whether a crash is alleged;
k. Whether a fire is alleged;
l. Whether property damage is alleged;
m. Number of alleged injuries, if any; and
n. Number of alleged fatalities, if any.

Provide this information in Microsoft Access 2010, or a compatible format, entitled "REQUEST NUMBER TWO DATA." A pre-formatted data collection file, which provides further details regarding this submission, will be provided to you.

A3. FCA US' responses to subparts (a) through (n) of this Request are located in **ENCLOSURE 03** and titled **PE22-013_REQUEST NUMBER TWO DATA.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 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. For each vehicle identified in the responsive data to Request No. 2, provide a complete dealer service history within 6 months of (before and after) the alleged incident or report date (whichever is earliest) and report close date.

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 keyword search using words reasonably related to the reports sought by this IR. The keyword search criteria used in this search are located in **ENCLOSURE 04** and titled **PE22-013_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, non-privileged 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 **PE22-013_CONSUMER AND CUSTOMER COMPLAINTS.pdf** and the related documents are arranged in corresponding folders by complaint number. Field reports are contained in files titled **PE22-013_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), email address and telephone number (please use distinct fields for each data type);
c. Vehicle owner or fleet street address, city, state (postal abbreviation), and ZIP code (please use distinct fields for each data type);
d. 17-character VIN;
e. Repair date (MM/DD/YYYY);
f. Vehicle mileage at time of repair;
g. Repairing dealer's or facility's name, telephone number, city and state or ZIP code (please use distinct fields for each data type);
h. Labor operation number(s);
i. Problem code(s);
j. Diagnostic trouble code(s);
k. Replacement part number(s) and description(s);
l. Concern stated by customer;
m. Cause as stated on the repair order;
n. Correction as stated on the repair order; and
o. 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." A pre-formatted data collection file, which provides further details regarding this submission, will be provided to you.

A5. FCA US' response to this Request is located in **ENCLOSURE 05** and titled **PE22-013_WARRANTY DATA**. DTCs are not stored in a separate database field and may be manually entered by a claim administrator into the narrative(s) of the warranty claim.

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, diagnostic trouble codes, part numbers and any other pertinent parameters used.

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 the keyword search provided in **ENCLOSURE 04** and an eyes-on review of the claims to determine responsiveness to the Alleged Defect.

7. 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.

A7. FCA US has not identified any labor operations, labor operation descriptions, problem codes, problem code descriptions, diagnostic trouble codes and diagnostic trouble code descriptions associated with the Alleged Defect.

8. 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.

A8. New vehicle warranty coverage offered by FCA US on the Subject Vehicles is located in **ENCLOSURE 08** and titled **PE22-013_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, are provided by option, model and model year located in the table included in **ENCLOSURE 08** and titled **PE22-013_SERVICE CONTRACTS_CONF BUS INFO.pdf**.

9. 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.

A9. FCA US has conducted a reasonable and diligent search of the normal repositories of information potentially responsive to this Request and did not identify any responsive materials.

10. 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.

A10. FCA US' responses to subparts (a) through (f) of this Request are located in **ENCLOSURE 10** and are summarized in the chart titled **PE22-013_ACTIONS SUMMARY_CONF BUS INFO.pdf**. Copies of responsive related documentary information are included within **ENCLOSURE 10**.

11. 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 vehicle system that shuts the vehicle down or into a limp mode as a result of an engine coolant temperature concern, or the system that monitors engine temperature, from the start of production to date, which relate to, or may relate to, the alleged defect in the subject or peer 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.

A11. FCA US has conducted a reasonable and diligent search of the normal repositories of information potentially responsive to this Request and did not identify any responsive materials which relate to or may relate to the Alleged Defect.

12. Furnish FCA 's assessment of the alleged defect in the subject vehicles, 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.

A12. 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 concludes that there is no unreasonable risk to motor vehicle safety with respect to the Alleged Defect in the Subject Vehicles. FCA US' conclusion is explained below.

Background

In response to customer complaints, FCA US' Technical Safety and Regulatory Compliance ("TSRC") organization began its preliminary investigation of complaints potentially related to the Alleged Defect in October of 2022. The Investigation was closed as the information gathered during that investigation did not indicate that the Alleged Defect posed an unreasonable risk to motor vehicle safety. Any associated stalls can only occur at low speeds (less than or equal to 15.5 miles per hour ("mph")) and at the conclusion of the investigations the incident rate was very low, at 0.08 C/1000.

Analysis

With this context, FCA US turns to its assessment of the Alleged Defect. FCA US has completed a review of the Vehicle Owner Questionnaire ("VOQ") records provided by the Agency in connection with this investigation, as well as its internal records identified using the search parameters described in its response to Request No. 4 above. Based on that review, FCA US provides its analysis as follows.

FCA US did not identify a single accident, injury or fatality related to the Alleged Defect in the 228,969 2019-2020 MY Jeep Compass Subject Vehicles, within the estimated over 9 billion miles driven.

FCA US' analysis of the Alleged Defect in the Subject Vehicles indicates that customers are alleging the vehicle notifies the driver of an overheat condition, via a message and telltale lights, followed by an engine shutdown. To summarize the condition, the vehicles may experience an Engine Control Module ("ECM") reset that erroneously results in illumination of the high coolant gauge, overheat message and overheat symbol followed by an engine shutdown condition which may result in loss of motive power if certain conditions are met. Once the engine shuts down, the customer is instructed via an instrument cluster message to place the vehicle in park. The vehicle can be restarted and immediately driven with no issues.

The illumination of the three messages described in the paragraph above is not indicative of an actual overheat condition occurring in the vehicle. Rather it is due to a momentary reset of the ECM due to an

intermittent signal. During this intermittent signal there is no forced shutdown due to coolant temperature. Additionally, there are no active or stored Diagnostic Trouble Codes ("DTC") associated with this condition.

FCA US Engineering has verified that if an ECM reset occurs at engine speeds greater than 1000 RPM, then the engine is able to recover, and a loss of motive power does not occur due to the engine speed inertia. The potential for the engine to not recover can only occur at an RPM of less than 1000. 1000 RPM equates to no more than 15.5 mph, which is low speed. If this reset occurs while driving at low speed, then the engine may not be able to recover and the driver will need to stop the vehicle, place the vehicle in park and restart the vehicle. Reference page 11 of Q10_004_CONF BUS INFO.pdf located in Enclosure 10.

FCA US does not consider such low-speed events to be an unreasonable risk to motor vehicle safety, based on the investigation by ODI and subsequent closure of one Preliminary Evaluation ("PE") and denial of two Defect Petitions ("DP") addressed to FCA US. This is described in NHTSA's closure of PE13-016 and denial of DP17-002 and DP14-002, documented in Vol. 83, No. 95 of the Federal Register, below:

> NHTSA considers several factors when assessing the safety risk posed by conditions that may result in engine stall while driving. These include the speeds at which stalling may occur, the ability of the driver to restart the vehicle, the warning available to the driver prior to stalling, the effects of engine stall on vehicle controllability, when and where the stalling may occur and the effects of the condition on other safety systems of the vehicle. In general, conditions that result in engine stall during low-speed operation at idle, such as when slowing to a stop, and where the engine may be restarted right away, are considered by NHTSA to be among the least hazardous types of stalling problems and, absent other risk factors, are not considered to be unreasonable risks to safety.
> https://www.govinfo.gov/content/pkg/FR-2018-05-16/pdf/2018-10404.pdf

Conclusion

Based on FCA US' review of the data collected and provided in response to this Information Request and in its prior communications with the Agency, and in light of the analysis set forth above, FCA US has concluded that the Alleged Defect does not pose an unreasonable risk to motor vehicle safety. Particularly given that there have been no identified crashes, injuries or fatalities associated with the Alleged Defect in the Subject Vehicles in over 9 billion estimated miles driven, FCA US respectfully requests that the Agency close this investigation.