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").

Note: FCA US makes the following clarifications relating to the vehicles included in its response to PE23-008 as clarified with Messrs. Bruce York and Daniel Pinero of the National Highway Traffic Safety Administration's ("NHTSA") Office of Defects Investigation ("ODI") on July 11, 2023, and July 21, 2023:

- **Request 1:**
  - **Subpart e:**
    - **On July 14, 2023, FCA US provided a pdf file of the sales code order guides for the subject vehicles.**
    - **On July 21, 2023, NHTSA requested the sales code guides in Microsoft Excel format for the subject vehicles. Per discussion with Dan Pinero, FCA US will provide these documents with this submission on July 26, 2023.**
    - **NHTSA shall then identify the list of sales codes for which it requests corresponding VIN information. Upon receipt of NHTSA's sales code list, FCA US will provide the information requested as a supplement to this response.**
  - **Subpart f: FCA US is providing its response to subpart f of this request in ENCLOSURE 01 in a file titled PE23-008 – PART BUILD INFORMATION_CONF BUS INFO.pdf.**

1. State, by model and model year, the number of subject 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. All sales codes for each vehicle, including a decoder sheet providing a description of each sales code relevant to the subject vehicle
f. Subject component part numbers and design versions installed as original equipment; with a separate column for each component;
g. Date of manufacture (MM/DD/YYYY);
h. Date warranty coverage commenced (MM/DD/YYYY); and
i. 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." For sales code data, please use distinct fields per code for each VIN.

A1. FCA US' responses to subparts a through e and g through i of this Request are located in **ENCLOSURE 01** and titled **PE23-008_PRODUCTION DATA.accdb**. FCA US' response to subpart f of this request are located in **ENCLOSURE 01** and titled **PE23-008 – PART BUILD INFORMATION_CONF BUS INFO.pdf**.

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 "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 FCA '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. 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 **PE23-008_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 **PE23-008_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.

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 **PE23-008_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 **PE23-008_CONSUMER AND CUSTOMER COMPLAINTS.pdf** and the related documents are arranged in corresponding folders by complaint number. Field reports are contained in a file titled **PE23-008_FIELD REPORTS.pdf**. Service histories for each vehicle identified in response to Request No. 2 are contained in a file titled **PE23-008_SERVICE HISTORIES.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 and peer 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."

A5. FCA US' response to this Request is located in **ENCLOSURE 05** and titled **PE23-008_WARRANTY DATA.accdb**. 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 both a part number and keyword search and an eyes on review of the claims to determine responsiveness to the alleged defect. The keywords used for this search can be found in **ENCLOSURE 04** and titled **PE23-008_Q2 KEYWORD SEARCH CRITERIA.pdf**. The part numbers used for this search can be found in **ENCLOSURE 01** and titled **PE23-008 – PART BUILD INFORMATION_CONF BUS INFO.pdf**.

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. 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 **PE23-008_WARRANTY DATA.accdb**. The diagnostic trouble codes and diagnostic trouble code descriptions potentially related to the Alleged Defect are located in **ENCLOSURE 07** and titled **PE23-008_DTCs.pdf**. 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.

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 **PE23-008_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 **PE23-008_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' responses to this Request are located in **ENCLOSURE 09**.

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 **PE23-008_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 component, 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;**
  - **i) To include labeled diagrams, exploded views, and specification and/or data sheets of internal subcomponents, specifically internal electric motor**
- **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' responses to subparts (a) through (h) of this Request are located in **ENCLOSURE 11** and titled **PE23-008_CHANGE HISTORY_CONF BUS INFO.pdf**.

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;
b. any subject components currently owned by FCA that are available for purchase or vehicles exhibiting the alleged defect owned by FCA and;
c. 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' responses to this Request are located in **ENCLOSURE 12** and titled **PE23-008_PART SALES_CONF BUS INFO.pdf**, **PE23-008_PART USAGES_CONF BUS INFO.pdf** and **PE23-008_SUPPLIER INFORMATION.pdf**.

13. Are subject vehicles equipped with a feature that automatically engages the door locks at certain vehicle speeds? If so, does this feature prevent the door from being opened while the vehicle is in motion? Please state if such a feature is base equipment or only available for certain trims or options.

A13. Power door locks are standard equipment on all Subject Vehicles. The Subject Vehicles are also equipped with a feature that automatically engages the door locks. This feature is described in the owner's manuals for the Subject Vehicles which are being provided in **ENCLOSURE 13**. This feature does not prevent the door from being opened while in motion. The front doors can always be opened manually from inside the vehicle.

14. For vehicles equipped with a security/theft deterrent system, can the vehicle security system engage the door locks? If so, how does the security system engage the door locks? Can the security

system cause the door locking system to enter a state which is unresponsive to manual or electrical actuation?

A14. The security/theft deterrent system, on Subject Vehicles so equipped, does not engage the door locks; rather, the locking of the vehicle with the key fob engages the security/theft deterrent system. The security system, as designed, cannot cause the door locking system to enter a state which is unresponsive to manual or electrical actuation. The front doors can always be opened manually from inside the vehicle.

15. Describe the electrical signals that actuate the subject vehicle door lock system on each door. Characterize in terms of source, pulse width, voltage, or other applicable electrical terminology.

A15. For the power door lock feature, the vehicle door lock mechanisms are actuated by direct current via the body controller. The circuit diagram is located in the **ENCLOSURE 15** folder in a file titled **CIRCUIT DIAGRAM_CONF BUS INFO.pdf**. The front doors can always be opened manually from inside the vehicle.

16. What is the role of the wireless ignition module (WIN) in the subject vehicle door locking system? Describe how wireless commands are received by the module and ultimately result in door lock activation.

A16. The role of the wireless ignition node ("WIN") in the subject vehicle door locking system is to receive the wireless button press requests from the key fob and communicate them to the body control module ("BCM"). The front doors can always be opened manually from inside the vehicle.

17. Provide a list of all as-designed modes of unlocking and/or unlatching the subject vehicle doors, listing all possible system inputs and resulting system response.

A17.

Unlocking:

- Key fob – electrical
- Lock button – electrical
- EARS/ORC door unlock signal post-crash - electrical
- Key cylinder – mechanical
- Lock knob – mechanical
- Front door inside handle – mechanical

Unlatching:

- Inside handle front door – locked or unlocked will unlatch the door
- Inside handle rear door – if unlocked and child lock not engaged, will unlatch the door
- Outside handle – if unlocked, will unlatch the door

The child lock feature is described in the owner's manuals for the Subject Vehicles which are being provided in **ENCLOSURE 13**.

The front doors can always be opened manually from inside the vehicle.

18. 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 report included with this inquiry.

A18. FCA US has reviewed the data provided in response to the Requests above and the VOQ 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

Door Operation

The front and rear doors can be opened with the interior handles when the doors are in an unlocked state.

As described in the owner's manuals (see **ENCLOSURE 13**) for the 2009 through 2020 model year Dodge Journey, the front doors can be both locked and unlocked from the interior using the powered door lock switches on the interior front door panels. The doors can also be locked and unlocked with the Keyless Enter-N-Go (Passive Entry) system. Both front doors can be opened while in the locked state via a one-step process by pulling on the interior door handle to unlock and open the front doors.

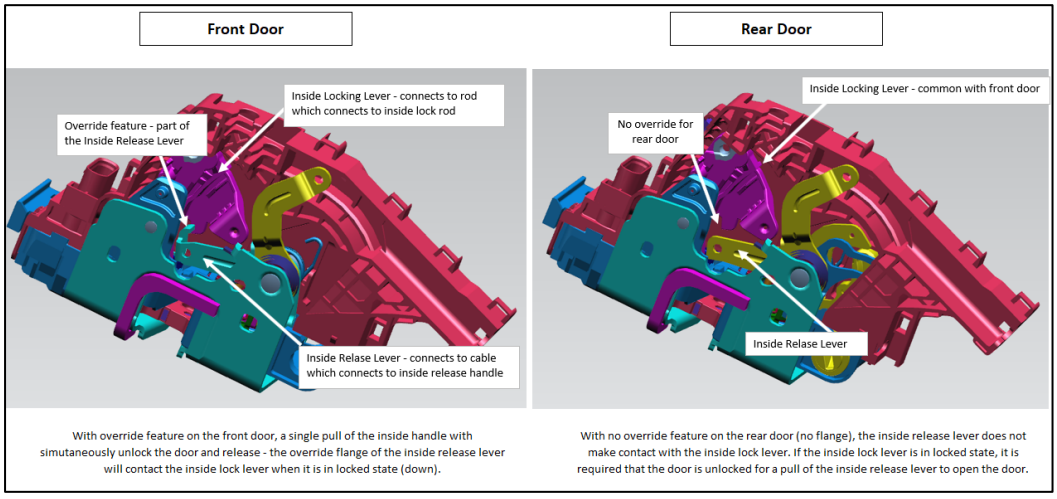


Figure 1 Front and Rear Latch and Lock Actuator Assemblies

Consistent with FMVSS 206, while in the locked state opening the rear doors is a two-step process. The occupant must first manually move the lock knob up to the UNLOCK position and then pull the interior door handle. There is no override feature on the rear doors when locked.

49 CFR §571.206 S4.3.1 - Rear side doors:

> *Each rear side door shall be equipped with at least one locking device which has a lock release/engagement mechanism located within the interior of the vehicle and readily accessible to the driver of the vehicle or an occupant seated adjacent to the door, and which, when engaged, prevents operation of the interior door handle or other interior latch release control and requires separate actions to unlock the door and operate the interior door handle or other interior latch release control.*

It is important to note that the subject vehicles are equipped with a Child-Protection Door Lock System, to provide a safer environment for small children riding in the rear seats. The Child-Protection Door Lock System is engaged via a switch located on the sheet metal of each of the rear doors, which is only accessible when the door is open (see Figure 2).

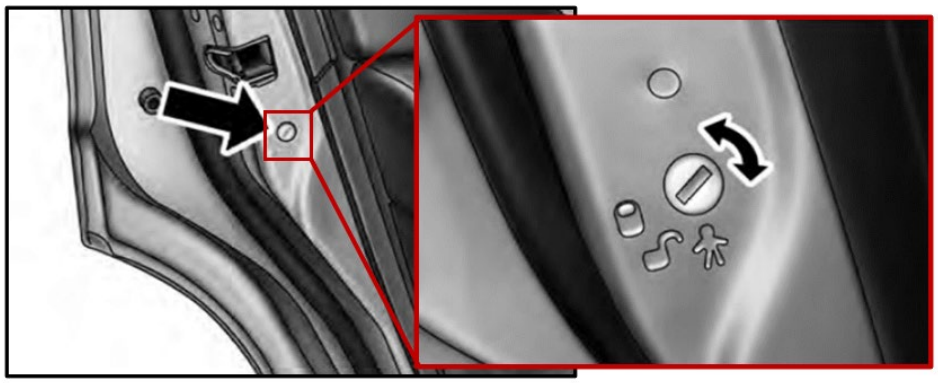


Figure 2 Child-Protection Door Lock System

When the Child-Protection Door Lock system is engaged, that rear door can be opened only by using the outside door handle even though the inside door lock knob is in the unlocked position. For emergency exit with the Child-Protection Door Lock system engaged, move the lock knob up to the unlock position, roll down the window, and open the door with the outside door handle (as noted in the Owner's Manual warning shown in Figure 3).

WARNING!

Avoid trapping anyone in a vehicle in a collision. Remember that the rear doors can only be opened from the outside when the Child-Protection locks are engaged. Failure to follow this warning may result in serious injury or death.

Figure 3 Warning in Owner's Manual

Analysis

As stated in its ODI Opening Resume and the Information Request Letter served on FCA US in this matter, NHTSA opened this PE investigation based on a single fatal fire incident occurring in December 2022 in which the driver of a 2009 Dodge Journey was unsuccessful in exiting the vehicle before succumbing to the thermal event ("December 2022 Incident"). The December 2022 Incident is a tragedy. It is FCA US' position, however, that the Alleged Defect did not cause or contribute to the terrible outcome of the December 2022 Incident. Furthermore, the data shows that the Alleged Defect does not exist in the Subject Vehicles.

Based on the information available relating to the December 2022 Incident (Police Report, Fire Report, 911 Call, bystander video, and post-incident inspection of the vehicle), it is FCA US' conclusion that the Driver did not attempt to pull on either the driver side front interior door handle or the passenger side front interior door handle to unlock and open a front door. Inspection of the vehicle after the December 2022 Incident showed that both front interior door handles were verified to be properly connected to their respective latches and would have opened that door if pulled. Moreover, FCA US concludes that once the driver had moved to the rear seating area, she did not attempt to pull up the lock knob to the unlock position and then pull the interior door handle. During inspection of the vehicle after the December 2022 Incident, the rear door handle/latch assembly appeared to be fully attached and operational.

The driver in the December 2022 Incident related to the 911 operator that the "computer" system was acting up and she "can't do anything." The driver does not say that she tried to open either front door by pulling on the interior door handle.[1] Within 40 seconds of calling 911, the driver indicates she is moving towards the back of the vehicle. Approximately 2:13 into the 911 call the 911 operator tells the driver to "try to keep opening the handles...sometimes you have to pull them a couple times." The driver responds that "nothing works." There is no mention by the driver or the 911 operator of pulling up the lock knob to the unlock position.

It is FCA US' assessment that the mechanical door handle release mechanisms of both the front and rear doors were functioning properly. The driver of the vehicle involved in the December 2022 Incident did not attempt to open either front door by pulling on the interior door handles. Likewise, the driver did not attempt to pull up the lock knob to unlock the rear doors before pulling the rear door handle.

The data reviewed in response to this IR strongly indicates that any issue relating to the Subject Component in the Subject Vehicles relates to the lock system (locking and unlocking the vehicle doors electronically). As FCA US has shown, the lock status of the vehicle's doors does not prevent vehicle occupants from exiting the vehicle through any vehicle door. Thus, not only was the Alleged Defect not a factor in the December 2022 Incident, the Alleged Defect is not a factor in any of the Subject Vehicles.

[1] Bystander video shows flames coming from the underside of the vehicle at or near the front of both the driver's door and passenger side front door.

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 the lack of injuries or fatalities associated with the Alleged Defect in the Subject Vehicles, FCA US respectfully requests that the Agency close this investigation.