

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, changed its name to FCA US LLC (“FCA US”).

FCA US makes the following clarification to this Information request:

- On March 25, 2024, FCA US requested an extension for the responses to questions 4, 10, and 13. On March 26, 2024, NHTSA granted this request.
- This submission contains full responses to questions 1, 2, 3, 5, 6, 7, 8, 9, 11, and a partial response to questions 4 and 12.
- April 8, 2024 Supplemental Submission
 - On April 1, 2024, FCA US submitted full or partial responses to questions 1,2,3,4,5,6,7,8,9,11, and 12.
 - This submission incorporates the previously submitted items and adds the requested information for questions 4, 10, 12, and 13.
 - This submission also contains additional information obtained for question 11.

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. **Engine displacement;**
 - f. **Fuel pump module (as referenced in TSB 18-001-18) part number and design version installed as original equipment;**
 - g. **Date of manufacture (MM/DD/YYYY);**
 - h. **The date TSB 18-001-18 was applied;**
 - i. **Date warranty coverage commenced (MM/DD/YYYY); and**
 - j. **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." 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 j of this Request are located in ENCLOSURE 01 and titled PE24-003 PRODUCTION DATA.accdb. FCA US clarifies that the response for subpart f is assumed based on production date compared to Change Notice date.**
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 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. **Property damage claims; and**
 - e. **Third-party arbitration proceedings, both pending and closed, where FCA is or was a party to the arbitration; and**
 - f. **Lawsuits, both pending and closed, in which FCA 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 "c" through "f" 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. In compiling its response to this Request, FCA US separated responsive reports into two categories for Subject Vehicles: 1) those reports that relate to the Alleged Defect in the Subject Component; and 2) those reports that may relate to the Alleged Defect. Information related to these two categories of reports comprises FCA US' responses to subparts (a) through (f) of this Request. That information is located in **ENCLOSURE 02** and titled **PE24-003_REPORTS.pdf**. For question 2, subparts "c" through "f", FCA US has provided all relevant and available records in response to question 4.

- 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 (numeric data type);
 - h. Incident date (MM/DD/YYYY);
 - i. Report or claim date (MM/DD/YYYY);
 - j. Whether a crash is alleged;
 - k. Whether property damage is alleged;
 - l. Number of alleged injuries, if any; and
 - m. 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 (m) of this Request are located in **ENCLOSURE 03** and titled **PE24-003_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 word search using words reasonably related to the reports sought by this IR. The keyword search criteria, as well as the categorization criteria, used in this search is located in **ENCLOSURE 04** and titled **PE24-003_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.

April 8, 2024 Supplement Response: Copies of the available, non-privileged documents related to each item within the scope of Request No. 2 are located in **ENCLOSURE 4**.

The customer complaint summaries are submitted in a file titled **PE24-003_CONSUMER AND CUSTOMER COMPLAINTS.pdf** and the related documents are arranged in corresponding folders by complaint number. Field reports are submitted in a file titled **PE24-003_FIELD REPORTS.pdf** and the related documents are arranged in corresponding folders by complaint number. Service histories for each vehicle identified in response to Request No. 2 are contained in files titled **PE24-003 REPAIR ORDER SERVICE HISTORY.pdf** and **PE24-003 WARRANTY SERVICE HISTORY.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. **Vehicle's make/model/model year (please use distinct fields for each data type);**
- f. **Repair date (MM/DD/YYYY);**
- g. **Vehicle mileage at time of repair (numeric data type);**
- h. **Repairing dealer's or facility's name, telephone number, city and state or ZIP code (please use distinct fields for each data type);**
- i. **Labor operation number(s);**
- j. **Problem code(s);**
- k. **Diagnostic trouble code(s);**
- l. **Replacement part number(s) and description(s);**
- m. **Concern stated by customer;**
- n. **Cause as stated on the repair order;**
- o. **Correction as stated on the repair order; and**
- p. **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 **PE24-003_WARRANTY DATA.accdb**. DTCs are not stored in a separate database field but may be manually entered by a claim administrator into the narrative(s) of the warranty claim, if available.

April 8, 2024 Supplement Response: FCA US has supplemented its response to question 5 with the updated file located in **ENCLOSURE 5** and titled **PE24-003_WARRANTY DATA.accdb**.

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 a part number search. The part numbers used for this search can be found in **ENCLOSURE 06** and titled **PE24-003_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, 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 **PE24-003_WARRANTY DATA.accdb**. The labor operations descriptions potentially related to the Alleged Defect in the Subject Components are located in **ENCLOSURE 7** and titled **PE24-003_LOP DESCRIPTIONS.pdf**. The diagnostic trouble codes and diagnostic trouble code descriptions potentially related to the Alleged Defect in the Subject Components are also located in **ENCLOSURE 07** and titled **PE24-003_DTCs.pdf**. DTCs are not stored in a separate database field but may be manually entered by a claim administrator into the narrative(s) of the warranty claim, if available.

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 Basic and Powertrain limited warranty (4 years/50,000 miles). Corrosion limited warranty for outer panels (5 years/Unlimited miles). Consumer Goodwill is the same as a US vehicle, during Basic (4 years/50,000 miles), and the Warranty Goodwill (2 years/24,000 miles) after the Basic ends.

Extended warranty and service contract coverage option(s) that FCA US offered for the Subject Vehicles, and the number of vehicles that are covered under each such extended warranty, is

provided by option, model and model year, located in the table included in **ENCLOSURE 08** and titled **PE24-003_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 involving the subject component on the subject vehicles or TSB 18-001-18, 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 will be provide this response in the April 8, 2024 submission

April 8, 2024 Supplement Response: FCA US' responses to subparts (a) through (f) of this Request are located in **ENCLOSURE 10** and are summarized in the chart titled **PE24-003_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 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' responses to subparts (a) through (h) of this Request are located in **ENCLOSURE 11** and titled **PE24-003_CHANGE HISTORY_CONF BUS INFO.pdf**.

April 8, 2024 Supplement Response: FCA US has supplemented its response to question 11 with two additional changes made to the subject components with the updated file located in **ENCLOSURE 11** and titled **PE24-003_CHANGE HISTORY_CONF BUS INFO**.

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. Fuel pump module(s); and
- b. Any kits that have been released, or developed, by FCA for use in service repairs to the subject component/assembly.

For each component part number, provide the supplier's name, address, and appropriate point of contact (name, title, and telephone number). Also identify by make, model and model year, any other vehicles of which FCA is aware that contain the identical component, whether installed in production or in service, and state the applicable dates of production or service usage.

A12. FCA US' response to this Request is located in **ENCLOSURE 12** and titled **PE24-003_PART SALES_CONF BUS INFO.pdf**. The supplier information will be provided in the April 8, 2024 submission.

April 8, 2024 Supplement Response: The supplier contact information is located in **ENCLOSURE 12** and titled **PE24-003_SUPPLIER CONTACT INFORMATION.pdf**. FCA US has used a substantially similar subject component in the 2017-2024 Alfa Romeo Stelvio and the 2020-2024 Alfa Romeo Giulia.

13. Furnish FCA's assessment of the alleged defect involving the subject component on 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; and
- 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.

Mr. Bruce York
Reference: NEF-102; PE24-003
April 1, 2024

ATTACHMENT

Page 8 of 8

A13. FCA US's assessment will be provided in the April 8, 2024 submission.

April 8, 2024 Supplement Response:

FCA US conducted a full and diligent search in the normal repositories of information for records that relate to or may relate to the Alleged Defect involving the Subject Component on the Subject Vehicles. In the process of reviewing and categorizing potentially responsive records, FCA US found only 14 records where the customer/owner alleged the vehicle stalled or loss of motive power ("LOMP") and subsequent repair history indicated a fuel pump was replaced.

In addition to customer complaints, FCA US identified 464 warranty claims where the fuel pump was replaced after an alleged vehicle stall. Analysis of these claims does not draw a clear line of cause and effect between the fuel pump and the alleged stall, but reveals numerous potential causes for stall. Nearly 25% of these warranty claims include repairs in addition to the fuel pump and/or multiple parts or systems of the vehicle being serviced, including, but not limited to: 12V battery, transmission sensors, fuel level calibration, body control module, and powertrain control module. Approximately 14% of the warranty claims were allegations of stall while stationary or at low speeds. In approximately 75% of the claims, there was not a clear indication of the vehicle speed when the stall occurred, but it appears that numerous were at lower speeds or at startup. Thus, approximately 89% of the claims do not allege a loss of motive power at speeds above 25 MPH. Lastly, over 100 of the complaints and claims that relate to or may relate to the alleged defect were vehicles included in the scope of recall 19V-551 (V84), but had not yet had the remedy completed at the time of complaint. This suggests the alleged incidents may very well be due to the 19V-551 (V84) body control module software issue and not the fuel pump.

Analysis of the total number of claims reported in response to Request Two that relate to or may relate to the alleged defect indicates that the vast majority are 2017 MY vehicles. These vehicles were not included in 19V-551 (V84). FCA US is currently investigating the engineering justification for these vehicles to be excluded from that recall population.

Based on the data available and FCA US' review and analysis of that data, FCA US' assessment of the alleged defect involving the subject component on the subject vehicles is that the failures of the Subject Component in the Subject Vehicles do not constitute a defect that affects motor vehicle safety within the meaning of the Motor Vehicle Safety Act 49 U.S.C. 301 et seq. A vehicle may stall or lose motive power for a multitude of reasons, and the data does indicate a wide variety of potential reasons which may have resulted in a stall or LOMP in the Subject Vehicles. Because the vast majority of alleged incidents originate from the 2017 MY Subject Vehicles not included in 19V-551 (V84), FCA US believes its investigation into this population will clear up the confounding information gathered thus far. FCA US recognizes the potential safety risk of alleged vehicle stall / LOMP and will continue to investigate this and other potential safety defects. If such a safety defect is found, FCA US will take appropriate action.

As FCA US does not believe that the Subject Component (fuel pump assembly) contains a defect that affects motor vehicle safety, we respectfully request this investigation be closed.