

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”).

FCA US makes the following clarification to this Information request:

- On July 18, 2025, FCA US requested an extension for the responses to questions 2, 3, 4, 5, 6, 18, 21,22. On July 22, 2025, NHTSA granted this request.
- This initial submission made on July 25, 2025 contains full responses to questions 1, 7, 8, 9, 10, 11, 12, 13, 14, 15, 16, 17, 19, 20.
- Subject Vehicles and Alleged Defects: On July 17, 2025 FCA US requested NHTSA adjust the scope of the Subject Vehicles as it relates to the Secondary Alleged Defect. Due the fact that the Secondary Subject Component is only present in 2009-2010 Model Year (“MY”) Subject Vehicles, FCA US requested that NHTSA agree to limit the scope to 2009-2013 MY, still providing a peer scope for the Secondary Subject Component. On July 17, 2024 NHTSA agreed to limit the scope for the Secondary Subject Component and related questions to 2009-2014 MY. As a result, FCA US has adjusted the response where the Subject Vehicles are referenced in relation to the Secondary Subject Component to be 2009-2014 MY only.
- Quarterly Updates for Question 13: On June 18, 2025 FCA US and NHTSA discussed and agreed in principle to a modified update schedule relating to Question 13 of this Information Request. On July 30, 2025 NHTSA indicated their approval in writing. As a result, FCA US will provide three supplemental submissions of question 2-6 material, to be submitted on a six-month interval starting from the date this IR was issued: in this case June 6, 2025. Resulting supplemental submissions will be submitted within the weeks following December 6, 2025, June 6, 2026, and December 6, 2026. Any adjustments to the adjusted schedule would be discussed collaboratively pending any updated circumstances.
- For requests 18 and 19, where NHTSA refers to “the subject vehicle” FCA US is understanding that to refer to the specific 2009 Dodge Journey. In its response to question 20, 21, and 22, FCA US is using “the subject vehicle” in the same way, referring to the specific vehicle and

incident which initiated this investigation. Dan Pinero confirmed that NHTSA is aligned with this in an August 1, 2025 email.

- August 8, 2025: FCA US submits its response to Questions 2,3,4,5,6,18,21,22 which completes the response to this Information Request.

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. Primary subject component part number and design version installed as original equipment;**
- f. Secondary subject component part number and design version installed as original equipment;**
- g. Door lock type (automatic, manual, or if other provide description);**
- h. Whether vehicle contains an electronic door module;**
- i. Date of manufacture (MM/DD/YYYY);**
- j. Date warranty coverage commenced (MM/DD/YYYY); and**
- k. The State in the United States where the vehicle was originally sold or leased, or**
- l. 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. July 25, 2025 Response: FCA US’ responses to subparts a through l of this Request are located in **ENCLOSURE 01** and titled **EA24-003_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 defects in the subject vehicles. Provide separately for each alleged defect:

- 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 incident, to include description and ages of alleged injuries/fatalities, causal and contributing factors, and FCA’s assessment of the incident, 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, description of resolution (if closed), date on which the complaint or other document initiating the action was filed, and provide any associated documents containing objective, analytical, or technical information.

A2. **July 25, 2025 Response:** FCA US will submit its response to **Request 2** on or before August 8, 2025.

August 8, 2025 Response: FCA US has conducted a reasonable and diligent search of the normal repositories of information potentially responsive to the Request. In compiling its response to this Request, FCA US separated responsive reports into two categories for both Subject Vehicles: 1) those reports that relate or may relate to the Primary Alleged Defect (“AD”); and 2) those reports that relate or may relate to the Secondary AD. That information is located in **ENCLOSURE 02** and titled **EA24-003_REPORTS_PRIMARY.pdf** and **EA24-003_REPORTS_SECONDARY.pdf**. Information For question 2, subparts (c) through (g), FCA US has provided the request for additional information within the databases located in **ENCLOSURE 03**.

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 a fire or thermal event is alleged;
 1. The area of origin of the fire or thermal event (e.g., upper-left hand engine compartment), state the specific components at the origin, if known;
 2. The alleged cause of the fire or thermal event;
 3. FCA or FCA contractor/consultant assessment of the likely cause of the fire or thermal event;
- l. Whether the report is responsive to the primary or secondary alleged defect;
- m. Whether property damage is alleged;

- n. Number of alleged injuries, if any;
- o. Number of alleged fatalities, if any; and
- p. Whether vehicle was repurchased by FCA.

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. **July 25, 2025 Response:** FCA US will submit its response to **Request 3** on or before August 8, 2025.

August 8, 2025 Response: FCA US' responses to subparts (a) through (p) of this Request are located in **ENCLOSURE 03** and titled **EA24-003_REQUEST NUMBER TWO DATA PRIMARY.accdb** and **EA24-003_REQUEST NUMBER TWO DATA SECONDARY.accdb**

4. **Produce copies of all documents related to each item within the scope of Request No. 2 AND for the vehicles listed in Enclosure 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, in Microsoft Access 2010 or a compatible format, 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. **July 25, 2025 Response:** FCA US will submit its response to **Request 4** on or before August 8, 2025.

August 8, 2025 Response: 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 2 **AND for the vehicles listed in Enclosure 2** were gathered using information such as vehicle model, model year, and a word search using words reasonably related to the reports sought by this Information Request ("IR"). The keyword search criteria, as well as the categorization criteria, used in this search are contained in **ENCLOSURE 6** and titled **EA24-003_Q4 Keyword Search_Primary.pdf** and **EA24-003_Q4 Keyword Search_Secondary.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 documents related to each item within the scope of Request No. 2 can be found in **ENCLOSURE 04** including those in **ENCLOSURE 4** subfolders **Primary AD** and **Secondary AD**.

The customer complaint summaries and Field reports are contained in the files titled **EA24-003_Primary Backup.accdb**, and **EA24-003 Secondary Backup.accdb**. The related documents are arranged in corresponding folders by complaint number. Service Histories are contained in the files titled **EA24-003_Service History – Primary.accdb**, and **EA24-003 Service History - Secondary.accdb**. Legal summaries are contained in **Enclosure 2**.

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 defects 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 and 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. Whether the report is responsive to the primary or secondary alleged defect;
- n. Concern stated by customer;
- o. Cause as stated on the repair order;
- p. Correction as stated on the repair order; and
- q. 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. **July 25, 2025 Response:** FCA US will submit its response to **Request 5** on or before August 8, 2025.

August 8, 2025 Response: FCA US' responses to this Request is located in **ENCLOSURE 05** and titled **EA24-003 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.

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. **July 25, 2025 Response:** FCA US will submit its response to **Request 6** on or before August 8, 2025.

August 8, 2025 Response: 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 same key words used for Question 2. Since labor operations for the alleged defects do not exist, and in order to broadly search all potential records, FCA US additionally utilized 2009-2020 Dodge Journey door latch part numbers for repairs post PE23-008 (June 15, 2023) through June 5, 2025. The method utilized for the primary AD is less effective for the secondary AD and therefore FCA US executed the key-word search for MY 2009-2014 claims. The key words used can be found in ENCLOSURE 06 and titled **EA24-003_Q4 KEYWORD SEARCH CRITERIA_Primary.pdf** and **EA24-003_Q4 KEYWORD SEARCH CRITERIA_Secondary.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 defects 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: **July 25, 2025 Response:** There are no labor operations or DTC's directly associated with the Primary or Secondary Alleged Defects. On July 26, 2023, FCA US responded to PE23-008, Information Request, Request 7, with DTC's related to lock and latch items (Primary Alleged Defect here). FCA US notes that 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. **Produce copies of all service, warranty, and other documents that relate to, or may relate to, the alleged defects or subject component(s) 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. If FCA has drafted any such communications, furnish a copy of the draft. Also include the latest draft copy of any communication that FCA is planning to issue within the next 120 days.**

A8. **July 25, 2025 Response:** FCA US' responses to this Request are located in **ENCLOSURE 08**.

9. **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 defects in the subject vehicles that have been conducted, are being conducted, are planned, or are being planned by, or for, FCA. Include recent tests and analyses performed by FCA and/or the primary subject component supplier. 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 and by alleged defect.

A9. **July 25, 2025 Response:** FCA US' responses to subparts (a) through (f) of this Request are located in **ENCLOSURE 09** and are summarized in the chart titled **EA24-003_ACTIONS SUMMARY_CONF BUS INFO.pdf**.

10. Describe all modifications or changes made by, or on behalf of, FCA in the design, material composition, manufacture, quality control, supply, or installation of either subject component, from the start of production to date, 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. Organize the response by primary and secondary alleged defect.

A10. **July 25, 2025 Response:** FCA US' responses to subparts (a) through (h) of this Request for the Primary and Secondary Subject Components are located in **ENCLOSURE 10** and titled **EA24-003_PRIMARY_CHANGE HISTORY_CONF BUS INFO.pdf**, and **EA24-003_SECONDARY_CHANGE HISTORY_CONF BUS INFO.pdf**.

11. 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). Provide information for both primary and secondary subject components:

- 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 primary or secondary 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 substantially similar component, whether installed in production or in service, and state the applicable dates of production or service usage.

A11. **July 25, 2025 Response:** FCA US' responses to this Request are located in **ENCLOSURE 11** and titled **EA24-003_PART SALES_DOOR LATCH_CONF BUS INFO.pdf**, and **EA24-003_PART SALES_TIPM_CONF BUS INFO.pdf**. Relating to the Primary Subject Component, FCA US has previously provided all make-model-year combinations that have similar lock and latch designs. See the supplemental response dated **2024 04 26** to **PE23-008**. Regarding the Secondary Subject Component, FCA US provides the list in **ENCLOSURE 11** titled **EA24-003_FCA US Vehicles with TIPM7_CONF BUS INFO.pdf**. FCA US' response to request for supplier contact information is provided in **ENCLOSURE 11** titled **EA24-003_SUPPLIER CONTACTS.pdf**.

12. Regarding acquisition of known primary or secondary subject components; state the number of each of the following currently in FCA's possession:

- a. **Exemplar subject components that are available for purchase by NHTSA;**
- b. **Subject components related to either alleged defect; and**
- c. **Subject vehicles experiencing either alleged defect.**

A12. **July 25, 2025 Response:** FCA US' responses to this Request are located in **ENCLOSURE 12** and titled **EA24-003_PARTS INVENTORY.pdf**.

13. Provide quarterly updates to Requests 2 through 6 until the publication of the closing resume of EA24003.

A13. **July 25, 2025 Response:** FCA US and NHTSA discussed and agreed to a modified update schedule. FCA US will provide three supplemental submissions of question 2-6 material, to be submitted on a six-month interval starting from the date the IR was issued: in this case June 6, 2025. Resulting supplemental submissions would be submitted in the weeks following December 6, 2025, June 6, 2026, and December 6, 2026. Any adjustments to the amended schedule would be discussed collaboratively pending any updated circumstances.

14. Provide the following information related to the secondary subject component as installed on the subject vehicles. If material changes exist between different versions of the secondary subject component, state the materials associated with each version of the applicable subcomponent;

- a. **Bill of materials of each major subcomponent (e.g. module casing, connector housing, circuit board material, etc). Do not include individual electrical subcomponents (fuses, relays,**

capacitors, resistors, MOSFETs, etc).

A14. **July 25, 2025 Response:** FCA US conducted a reasonable and diligent search for this material but did not locate responsive documents.

15. Provide information concerning the design of the primary component to include the following:

- a. Design standards, specifications, or guidelines involving component electrical characteristics;
- b. Failure Mode and Effects Analysis (FMEA), or similar, related to the primary alleged defect;
- c. Design Verification Plan and Report (DVP&R), or similar qualification report, that may relate to the related to the primary alleged defect;
- d. Any engineering documentation, testing data, or design information related to primary subject component wear and aging.

A15. **July 25, 2025 Response:** FCA US' responses to subparts (a) through (d) of this Request are located in **ENCLOSURE 15**. FCA US was unable to locate the Product Verification Plan and Report ("PVP&R") for the latch used on the 2009 Dodge Journey, however, the lock and latch mechanism is nearly identical to the 2011 Dodge Charger and Dodge Challenger. The PVP&R for those products is provided in **ENCLOSURE 15**.

16. Provide the total number of warranty returns and the warranty return rate for the primary and secondary subject components on the subject vehicles for any reason, by model year. If available, state the reason why the components were returned, organized by percentage.

A16. **July 25, 2025 Response:** FCA US' response to this Request is located in **ENCLOSURE 16** and titled **EA24-003_Q16_0001_CONF BUS INFO.pdf**.

17. Provide the 12-volt battery electrical current draw of a 2009-2010 Dodge Journey vehicle in the following electrical states. State the range of current draw if applicable:

- a. Ignition off, engine cold;
- b. Ignition off, engine recently shut down;
- c. Accessory mode;
- d. Electrical on, engine off;
- e. Engine on, idle; and
- f. Engine on, while driving.

A17. **July 25, 2025 Response:** FCA US conducted a reasonable and diligent search for the requested information but did not locate any responsive documents.

18. Provide diagrams, photographs or other document that highlight the location of all fluid carrying lines and reservoirs in the subject vehicle engine compartment. The requested documents must

include labels indicating fluid type, fill tubes, ports, and drains. Provide for each engine compartment variant.

A18. **July 25, 2025 Response:** FCA US will submit its response to **Request 18** on or before August 8, 2025.

August 8, 2025 Response: FCA US' responses to this Request is located in **ENCLOSURE 18** and titled **EA24-003_Q18_2009 Journey Engine Pictures.pdf**.

19. Provide the following information regarding subject vehicle working fluids (engine oil, brake fluid, steering fluid, engine coolant):

- a. **Procedures to properly drain and fill fluid; and**
- b. **Nominal fill levels while cold and while flowing. Provide range of appropriate fill level if applicable.**

A19. **July 25, 2025 Response:** FCA US' response to this Request is located in **ENCLOSURE 19**.

20. Provide any documents regarding known trends in secondary subject component internal printed circuit board thermal damage. Provide for any variant of secondary subject component, not limited to variants only found on the subject vehicles. Include exemplar photographs, CT scans, X-ray imagery, or similar imagery obtained from non-destructive testing, if available. If no documents are available, provide a detailed description of the typical thermal damage pattern.

A20. July 25, 2025 Response: FCA US has not identified any known trends related to the Secondary Subject Component in either the Subject Vehicles or any other vehicles equipped with this component. While there have been some thermal events in other vehicles that appear to have originated near the TIPM7, no trend was identified.

It is important to note that although several FCA US vehicles use what is commonly referred to as a TIPM7, these are not identical to the version used in the 2009 Dodge Journey. Each TIPM7 is specific to the vehicle and its configuration, varying by VIN. Additionally, the under-hood locations and spatial relationships with other components differ across platforms.

FCA US is providing two presentations (see **Enclosure 20**) that detail the teardown and analysis of several TIPM7 units from non-subject vehicles. These presentations illustrate the typical physical condition of TIPM7s exhibiting thermal damage to the printed circuit board. These characteristics are not apparent in the TIPM7 unit currently in NHTSA's possession.

21. Furnish FCA's assessment of either 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; 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;**
- f. VOQ #11508217, and**
 - g. The other reports included with this inquiry.**

A21. **July 25, 2025 Response:** FCA US will submit its response to **Request 21** on or before August 8, 2025.

August 8, 2025 Response: FCA US previously provided a detailed explanation of the lock and latch system in its initial response to PE23-008. As described, the front door handles are mechanically connected to the latches and will open the doors when actuated, regardless of the lock status or any lock command issued by the Totally Integrated Power Module (“TIPM”). As further noted in our supplemental request response dated April 26, 2024, these or substantially similar door lock and latches have been utilized in numerous FCA US vehicles dating back to 2004 MY and continue to be used in current production.

FCA US’ latch supplier estimates that over 80 million of these latches have been manufactured for FCA US vehicles, both for production and service purposes. Throughout this time, neither FCA US nor the supplier is aware of any instance where a latch has “perched” or failed in a way that prevented occupant egress, except in cases involving mechanical damage due to crash or isolated latch failure. Importantly, even in the event of a single latch failure due to age or wear, such a failure would not affect multiple doors simultaneously. FCA US is not aware of any such multi-door failure occurring.

Regarding NHTSA’s latch “perching” experiment, FCA US engineering and the supplier engineering teams have reviewed and assessed the methodology and findings. It was concluded that the experiment does not reflect real-world vehicle behavior or capabilities.

In response to Request #2, FCA US has submitted a number of vehicle fire incidents that meet the definition of “fire” as set forth in 49 CFR § 579.4. However, a significant number of these cases would not be considered fires by a reasonable layperson. These cases represent a wide variety of incidents relating to a burning odor or some minor melting of various components. Examining all events per the 49 CFR § 579.4 definition, there are a variety of causes including various fluids leaking or being spilled on engine compartment components during service as well as several identified electrical points of origin, which include the battery, TIPM, or Power Distribution Center (“PDC”) among other things.

It is important to note that the subject vehicle that precipitated NHTSA’s investigation was a 2009 Dodge Journey equipped with a 3.5L engine and a TIPM7. Both the 3.5L engine and the TIPM7 were discontinued after the 2010 model year. Beginning in 2011, the Dodge Journey was equipped with a new 3.6L engine, and a new electrical architecture featuring a PDC in place of the TIPM7.

FCA US conducted a comprehensive analysis of all responsive records. The data indicate that incidents attributed to the battery, TIPM, or PDC occurred at extremely low rates.

- In 2009, the incident rate for the 2.4L engine was 0.01 c/1000 and on the 3.5L 0.12 c/1000.
- In 2010, the rates were 0.01c/100 for the 2.4L and 0.05 c/1000 for the 3.5L.

While fluid leaks showed slightly higher rates, they remained extremely low overall. A comparison between model years equipped with the 3.5L engine and the TIPM7 versus those with the 3.6L engine and the PDC revealed no significant differences. Including the “maybe responsive” claims did not change the outcome of the analysis. While underhood fire events as defined by 49 CFR § 579.4 did occur, they did so at a very low rate and did not exhibit a trend over the lifecycle of this vehicle program.

Secondary Alleged Defect Responsive Claims 49 CFR § 579.4	2009			2010			2011			2012			2013			2014		
	2.4L	3.5L	3.6L	2.4L	3.5L	3.6L	2.4L	3.5L	3.6L	2.4L	3.5L	3.6L	2.4L	3.5L	3.6L	2.4L	3.5L	3.6L
Known Origin - Battery/PDC/TIPM	0.01	0.12	0	0.01	0.05	0	0.00	0	0.06	0.04	0	0.08	0.05	0	0.02	0.03	0	0.08
Known Origin - Fluid Leak	0.02	0.33	0	0.05	0.33	0	0.00	0	0.15	0.01	0	0.09	0.26	0	0.09	0.15	0	0.22
Known Origin - Other Electrical	0.04	0.27	0	0.01	0.05	0	0.06	0	0.00	0.13	0	0.08	0.08	0	0.04	0.05	0	0.01
Unknown Origin	0.07	0.68	0	0.26	0.28	0	0.15	0	0.24	0.26	0	0.36	0.39	0	0.07	0.28	0	0.04
(blank)	0.01	0.13	0	0.03	0.11	0	0.00	0	0.21	0.05	0	0.05	0.08	0	0.04	0.05	0	0.01

Table 1 – 2009-2014 Dodge Journey Fire origin rates by engine type

Conclusion:

Regarding the 2009 Dodge Journey incident that initiated this investigation, FCA US’ fire investigator, along with two additional Fire Experts, including one for the plaintiff, inspected the vehicle and unanimously concluded that the fire was not electrical in origin. During the inspection, the vehicle was found to have an aftermarket trailer hitch installed, however, this vehicle was not equipped with the additional powertrain cooling equipment included on vehicles with a factory installed towing package. Based on anecdotal information suggesting the vehicle may have been used for towing, FCA US hypothesizes that the transmission may have been subjected to excessive thermal stress without adequate cooling. This could have resulted in the venting of hot transmission fluid onto heated surfaces, potentially igniting the fire.

Regarding the primary allegation of doors not opening, FCA US reiterates that the latch design ensures mechanical operation of the front doors independent of electronic lock status, and no systemic issue has been identified that would prevent occupant egress. In the response to PE23-008, FCA US also provided detail on the Child Protection Door Lock system (“Childlocks”). Based on information learned from NHTSA, it is likely that the Childlocks were turned on in this vehicle. That would explain why inside rear door handles would not open the vehicle doors. The front door handles, however, would not have been affected by Childlocks and the front doors would have opened.

FCA US’ investigation into the Subject Vehicle incident, and its larger examination of relevant information in order to respond to this Information Request, have concluded that there is no defect, let alone a defect that poses an unreasonable risk to motor vehicle safety. In the more than 20 years and approximately 80 million latches produced and used that are nearly the same style and design of door lock and latch mechanisms, FCA US is unaware of an occupant that is unable to open a door on the vehicle due to the design of the latch. In addition, FCA US has done a detailed search and review of all vehicles containing the secondary subject component and identified no trends which suggest there may be a defect that poses an unreasonable risk to motor vehicle safety. FCA US respectfully requests that NHTSA close this formal investigation.

Mr. Bruce York
Reference: EA24-003
August 8, 2025

ATTACHMENT

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22. Furnish a copy of all documents not specifically requested herein, which FCA believes are relevant to, or which were used in formulating its assessment of, the alleged defects in the subject vehicles.

A22. **July 25, 2025 Response:** FCA US will submit its response to **Request 22** on or before August 8, 2025.

August 8, 2025 Response: FCA US has worked collaboratively with NHTSA since before the original PE for this item was opened in 2023. During this time, FCA US has provided multiple formal responses to Information Requests, met to review and discuss the investigation, and shared large amounts of information with NHTSA on many occasions informally. FCA US participated in physical vehicle and component level reviews with NHTSA at NHTSA's VRTC facility. These documents and submissions collectively point to the conclusion that regardless of any door lock command, the front door latches will open when the interior handle is pulled, and this investigation should be closed. FCA US adds no additional documents not specifically requested herein to the record.