

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 April 23, 2024, FCA US requested an extension for the full response. On April 24, 2024, NHTSA granted this request.

1. State, by model and model year, the number of subject vehicles Chrysler has manufactured for sale or lease in the United States. Separately, for each subject vehicle manufactured to date by Chrysler, state the following:
 - a. Vehicle identification number (17-character VIN);
 - b. Make;
 - c. Model;
 - d. Model Year;
 - e. Subject component part number and design version installed as original equipment;
 - f. Date of manufacture (MM/DD/YYYY);
 - g. Date warranty coverage commenced (MM/DD/YYYY); and
 - h. 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 (h) of this Request are located in **ENCLOSURE 01** and titled **PE24-006_PRODUCTION DATA.accdb**. FCA US clarifies that the response for subpart e 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 Chrysler's assessment of the problem, with a summary of the significant underlying facts and evidence. For items "e" and "f" 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 **PE24-006_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:
- Chrysler's file number or other identifier used;
 - The category of the item, as identified in Request No. 2 (i.e., consumer complaint, field report, etc.);
 - Vehicle owner or fleet name (and fleet contact person), email address and telephone number (please use distinct fields for each data type);
 - Vehicle owner or fleet street address, city, state (postal abbreviation), and ZIP code (please use distinct fields for each data type);
 - Vehicle's 17-character VIN;
 - Vehicle's make, model and model year (please use distinct fields for each data type);
 - Vehicle's mileage at time of incident (numeric data type);
 - Incident date (MM/DD/YYYY);
 - Report or claim date (MM/DD/YYYY);
 - Whether a crash is alleged;
 - Whether property damage is alleged;
 - Number of alleged injuries, if any; and
 - 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 **PE24-006_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 Chrysler used for organizing the documents. Describe in detail the search methods and search criteria used by Chrysler 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 **PE24-006_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 **PE24-006_CONSUMER AND CUSTOMER COMPLAINTS.pdf** and the related documents are arranged in corresponding folders by complaint number. Warranty reports are titled **PE24-006_WARRANTY SERVICE HISTORY.pdf**. Repair Order reports are titled **PE24-006_RO SERVICE HISTORY.pdf**. Field Reports are titled **PE24-006_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. Chrysler'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. 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 **PE24-006_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 Chrysler 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 **PE24-006_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 **PE24-006_WARRANTY DATA.accdb**. The labor operations descriptions potentially related to the Alleged Defect in the Subject Components are located in **ENCLOSURE 7** and titled **PE24-006_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 **PE24-006_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 Chrysler 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 Chrysler 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 limited warranty (3 years/36,000 miles), Powertrain limited warranty (5 years/60,000 miles), Corrosion limited warranty for outer panels (5 years/Unlimited miles) and Roadside Assistance (5 years/60,000 miles). 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 **PE24-006_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 Chrysler 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 Chrysler 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' responses to subparts (a) through (f) of this Request are located in ENCLOSURE 10 and are summarized in the chart titled **PE24-006_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, Chrysler 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. If any design version of the subject component was withdrawn from production and/or sale, and remaining supplies of the parts were destroyed or removed from commerce, provide the reason why this occurred.
- h. When the modified component was made available as a service component; and
- i. 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 **PE24-006 CHANGE HISTORY_CONF BUS INFO.pdf**.

12. State the number of each of the following that Chrysler 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; and**
- b. Any kits that have been released, or developed, by Chrysler 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 Chrysler 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 **PE24-006_PART SALES_CONF BUS INFO.pdf** and **PE24-006_SUPPLIER INFORMATION.pdf**. FCA US has no identical component in production or in service.

13. Furnish Chrysler'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; 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.**

A13. 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 May of 2018, in response to customer complaints, FCA US' Technical Safety and Regulatory Compliance ("TSRC") organization began a preliminary investigation into complaints unrelated to the subject Alleged Defect. Two separate investigations were conducted, resulting in two recalls being issued, 18V-398 (U56) and 18V-396 (U58) to replace the rearview mirror with backup camera display on some 2018MY Dodge Journey vehicles due to field of view compliance concern.

In response to this investigation, 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 Components on the Subject Vehicles. In the process of reviewing and categorizing potentially responsive records, FCA US found 558 records where the customer/owner alleged display issues with their backup camera.

Analysis

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 226,250 2018-2020 MY Dodge Journey Subject Vehicles, within the estimated over 17 billion miles driven.

In its review of the warranty records, FCA US determined that 97% of the 5,259 warranty claims searched by part numbers, were camera replacements. The remaining warranty records were divided amongst the other subject components. FCA US conducted a statistically significant sample analysis (~13%) of warranty records for the rearview camera and found that 96% of the records reviewed were either Responsive or Maybe Responsive to the Alleged Defect.

FCA US' analysis of the Alleged Defect in the 26 VOQ records, determined that there were 13 vehicles which the customer did not bring the vehicle to a dealer for service, eight VOQs did not have a VIN associated with them, two vehicles had an unknown repair, two vehicles had the backup camera replaced, and one vehicle was Trouble Not Found ("TNF"). Looking at Parts Return Analysis System ("PRAS") data, 42 (91%) of the 46 backup camera parts that were returned and analyzed were TNF, two (4%) parts showed an internal failure, one part was deemed customer abuse, and one part had an unknown root cause.

When FCA US applies the data generated to the totality of the Warranty records, only 210 backup cameras are predicted to contain an internal failure. 210 backup cameras with an internal failure represents a C's/1000 of 0.9. Given the high number of TNF parts as well as the service history sequence, it appears highly likely that the backup camera is being replaced as a first repair attempt. In some cases, secondary repairs were identified involving the radio, rearview mirror, as well as various wiring repairs occur further supporting that the replacement of the rearview camera did not resolve the customer complaint or initial warranty claim. When examining the minimal other potential causes of the complaints and warranty data, there was no clear trend identified and therefore no further action taken.

Conclusion

Based on FCA US' full investigation in response to this request FCA US has concluded that the Alleged Defect does not pose an unreasonable risk to motor vehicle safety. The frequency of occurrence of the Alleged Defect in the Subject Component is less than 1 C/1000. There have been no identified crashes, injuries or fatalities associated with the Alleged Defect in the Subject Vehicles in over 17 billion estimated miles driven. Therefore, FCA US respectfully requests that the Agency close this investigation.