
Mike Wiacek
Head, Vehicle Safety Compliance and Product
Analysis

April 25, 2025

Peter Simshauser

Chief Counsel
National Highway Traffic Safety Administration
1200 New Jersey Ave., SE,
Room W41-227
Washington, DC 20590

Re: Request for Confidential Treatment of Business Information Submitted Regarding PE24-024

Dear Mr. Simshauser:

FCA US LLC (f/k/a Chrysler Group LLC) (“FCA US”) is submitting information to the NHTSA Office of Defects Investigation (“ODI”) in connection with the above-referenced investigation.

Based on a careful review of this information, FCA US has determined that some of the information is confidential and should be accorded confidential treatment under this agency’s regulations at 49 C.F.R. Part 512 and Exemption 4 of the Freedom of Information Act (“FOIA”), 5 U.S.C. § 552(b)(4). Therefore, FCA US is submitting the information via secure file transfer, together with this request for confidential treatment and Certificate in Support of Request for Confidentiality, to the Office of Chief Counsel.¹

The information required by Part 512 is set forth below.

A. Description of the Information (49 C.F.R. § 512.8(a))

The business information for which confidential treatment is being sought is described in the enclosed table found in **Appendix A**.

B. Confidentiality Standard (49 C.F.R. § 512.8(b))

Prior to the Supreme Court’s decision in *Food Marketing Institute v. Argus Leader Media*, 139 S. Ct. 2356 (2019), this submission would have been subject to the confidentiality standard set forth in 49 C.F.R. § 512.15(b) for information that the submitter is required to submit to the agency. The standard for confidential treatment is now set forth in *Food Marketing Institute*, 139 S. Ct. at 2366.

C. Justification for Confidential Treatment (49 C.F.R. § 512.8(c))

FOIA Exemption 4 precludes the disclosure of “trade secrets and commercial or financial information obtained from a person and privileged or confidential.” 5 U.S.C. § 552(b)(4). The information for

¹ FCA US has taken steps to assure that the zip files sent via secure file transfer are free of any errors or defects that would prevent NHTSA from opening the files on the files. If, however, the agency is unable to open the files, FCA US respectfully requests that the agency inform FCA US of the issue, so that FCA US may take steps to supply NHTSA’s Office of Chief Counsel with a file that is fully functional.

Mr. Peter Simshauser

April 25, 2025

Page -2-

which FCA US is seeking confidential treatment is clearly “commercial” because it relates to commercial terms in service contracts and the testing and specifications of products that FCA US offers for sale. *See, e.g., Judicial Watch, Inc. v. Export-Import Bank*, 108 F. Supp. 2d 19, 28 (D.D.C. 2000). FCA US also is a “person” under the case law governing Exemption 4. *See, e.g., id.*

In *Food Marketing Institute*, the Supreme Court held that information is “confidential” within the meaning of FOIA Exemption 4 when it is “both customarily and actually treated as private by its owner and provided to the government under an assurance of privacy.” 139 S. Ct. at 2366.

FCA US customarily and actually treats the information for which confidential treatment is being requested as private. FCA US makes this information available only to employees, agents, and suppliers who require the information to perform their duties for FCA US and who receive the information with the understanding of their obligations to maintain its confidentiality.

With regard to assurances of privacy, the Supreme Court expressly declined to hold that an assurance is, in fact, a *necessary* condition for confidentiality. *Id.* at 2363. Nor did the Court describe the nature of the “assurances” to which it referred.

In considering the question of assurances, the United States District Court for the District of Columbia repeatedly has concluded that an assurance of confidentiality is *not* required under D.C. Circuit precedent. *See Naumes v. Dep’t of the Army*, 2022 WL 594541, at *8 (D.D.C. Mar. 1, 2022) (“This Circuit does not require assurances of privacy as a separate component of confidentiality, and this Court will not ‘read the word “confidential” to impose a blanket requirement that the government provide an assurance of privacy in every case in which it asserts Exemption 4.’”) (quoting *Renewable Fuels Ass’n v. EPA*, 519 F. Supp. 3d 1, 12 (D.D.C. 2021)); *Cause of Action Inst. v. Export-Import Bank of the U.S.*, 2022 WL 252028, at *18 (D.D.C. Jan. 27, 2022) (stating that the Supreme Court did not resolve whether assurances are a mandatory element of confidentiality under Exemption 4, and “this Court has since explained that binding Circuit precedent compels an answer in the negative”); *Renewable Fuels*, 519 F. Supp. 3d at 12 (declining to require proof of an assurance of confidentiality). At most, according to the D.C. district court, an assurance is “relevant but not strictly required.” *See Wilson v. FCC*, 2022 WL 4245485, at *7 (D.D.C. Sept. 15, 2022) Indeed, “[i]f anything, courts here have taken the position that privately held information is generally confidential absent an express statement by the agency that it would *not* keep information private, or a clear implication to that effect (for example, a history of releasing the information at issue).” *Id.* at *10 (internal quotation marks omitted).

Moreover, even if an assurance of some kind were required under *Food Marketing Institute*, such an assurance need not take the form of a promise by an agency to protect the confidentiality of confidential business information. Although a promise of confidentiality was involved in *Food Marketing Institute*, in ordinary speech, an actual promise need not be made for information to be communicated “under an assurance of privacy.”

The Department of Justice Office of Information Policy (“OIP”) recognized that fact in guidance concerning *Food Marketing Institute*. Specifically, OIP instructed agencies that an *express* assurance of confidentiality is not required. See Exemption 4 After the Supreme Court’s Ruling in *Food Marketing Institute v. Argus Leader Media*, <https://www.justice.gov/oip/exemption-4-aftersupreme-courts-ruling-food-marketing-institute-v-argus-leader-media>, at 5 (second paragraph in subsection headed “Second Condition – Assurance of Confidentiality by Government”) (“[A]n assurance of confidentiality can be either explicit or implicit.”).

As the OIP guidance explains, past agency practice with regard to similar information can suffice for

Mr. Peter Simshauser

April 25, 2025

Page -3-

establishing an “implied assurance” of confidentiality. *See id.* (second paragraph under subsection headed “Implied Assurance”) (“Factors to consider include the government’s treatment of similar information For example, an agency’s long history of protecting certain commercial or financial information can serve as an implied assurance to submitters that the agency will continue treating their records in the same manner.”).

Similarly, in *Center for Medical Progress v. U.S. Dep’t of Health & Human Servs.*, 2022 WL 4016617 (D.D.C. Sept. 3, 2022), the court found that there were “implied” assurances of confidentiality (slip op. at *11) based, first, on a government declaration stating that the putative Exemption 4 information had been “‘routinely withheld at [the National Institutes of Health (“NIH”)] and other agencies . . . precisely in recognition of the commercial sensitivity of the information,’” and, second, on a submitter declaration indicating the submitter’s understanding of and reliance upon NIH’s standard practices (*id.*; quoting declaration).

Because the *Critical Mass* voluntary submission standard now governs *all* submissions of information in the D.C. Circuit (*see Renewable Fuels Ass’n*, 519 F. Supp. 3d at 12), NHTSA’s prior practice with regard to *voluntary* submissions provides the relevant standard for whether NHTSA’s past practice provides an assurance of privacy—if an assurance is required at all. In the context of voluntary submissions, NHTSA has consistently accorded confidential treatment to the kinds of records that are being submitted today—that is, tests, service contract summaries, and analysis summaries and descriptions.

Moreover, much of the information that FCA US is submitting today would have qualified for confidential treatment under the substantial-competitive-harm standard that was superseded by *Food Marketing Institute*. Analyses, tests, investigations, and evaluations would, if disclosed, apprise competitors of FCA US’s operational capabilities and enable them to replicate FCA US’s procedures and methodologies without incurring the substantial costs associated with independent development of these procedures and methodologies. Similarly, the release of testing information would enable competitors to develop their own testing capabilities at a fraction of the investments in time and money that would be required for independent development. The designs, diagrams, materials, and specification information contained in these documents would also enable competitors to evaluate and replicate FCA US’s designs, materials, and specifications. Summaries of numbers of service contracts sold could be invaluable to entities that compete in the after-market against FCA US. All of these damaging results of a release of such information have been deemed sufficient to establish substantial competitive harm in the past, when that standard applied.

The competitive harm that would result from a disclosure of the information also is relevant to the reasonable foreseeability of the harm that would result from a disclosure. *See* 5 U.S.C. § 552(a)(8)(A)(i)(I). In the post-*Food Marketing Institute* context, reasonably foreseeable harms sufficient to justify withholding under FOIA Exemption 4 include impairment of the legitimate commercial, financial, business, or research interests of the submitter. *See Naumes*, 2022 WL 594541, at *10.

Accordingly, the confidential treatment of the information that FCA US is submitting is warranted because that information is both customarily and actually treated as private by FCA US and is being provided to the government with an assurance of privacy derived from the expectation that NHTSA will continue its past practice—established both in the voluntary- and compelled-submission contexts—of not disclosing confidential commercial information of the kind at issue here.

Mr. Peter Simshauser

April 25, 2025

Page -4-

D. Class Determination (49 C.F.R. § 512.8(d))

Some of the information subject to this request consists of engineering drawings that satisfy the requirements of paragraph (1) of 49 C.F.R. Part 512, Appendix B.

The remaining information for which confidential treatment is sought does not fit within a class determination.

E. Duration for Which Confidential Treatment is Sought (49 C.F.R. § 512.8(e))

FCA US does not anticipate ever adopting a custom of disclosing to the public the kind of information for which confidential treatment is being sought. Therefore, FCA US requests that this information be accorded confidential treatment indefinitely.

F. Contact Information (49 C.F.R. § 512.8(f))

Please direct all inquiries and responses to the undersigned at:

800 Chrysler Drive; CIMS 482-00-83
Auburn Hills, MI 48326
(248) 425-0851
mike.wiacek@stellantis.com

The submission includes VINs from which customer identities may be derivable. FCA US assumes that NHTSA will redact these VINs and any other Personal Identifying Information prior to disclosing any of the submitted information to the public.

Enclosed herewith you will also find a Certificate in Support of Request for Confidentiality, signed by an authorized FCA US representative.

If you receive a request for disclosure of the information for which confidential treatment is being sought before you have completed your review of our request, FCA US respectfully requests notification of the request(s) and an opportunity to provide further justification for the confidential treatment of this information, if warranted.

Sincerely,



Mike Wiacek

Enclosures

cc: Mr. Bruce York

Mr. Peter Simshauser

April 25, 2025

Page -5-

<i>Bates page numbers: 4/25/2025 – FCA US LLC – PE24-024 – Compelled – <000001>-<000977></i>			
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PE24-024_ACTIONS SUMMARY_CONF BUS INFO.pdf	000016	000023	Consists of one .pdf containing entire page confidential business information. This file contains testing and/or analyses of the Subject Component which relate to, or may relate to, the Alleged Defect in the Subject Vehicles.
PE24-024_Q10_0001_CONF BUS INFO.pdf	000024	000024	Consists of one .pdf containing entire page confidential business information. This file contains testing and/or analyses of the Subject Component which relate to, or may relate to, the Alleged Defect in the Subject Vehicles.
PE24-024_Q10_0002_CONF BUS INFO.pdf	000025	000026	Consists of one .pdf containing entire page confidential business information. This file contains testing and/or analyses of the Subject Component which relate to, or may relate to, the Alleged

Mr. Peter Simshauser

April 25, 2025

Page -6-

			Defect in the Subject Vehicles.
PE24-024_Q10_0003_CONF BUS INFO.pdf	000027	000027	Consists of one .pdf containing entire page confidential business information. This file contains testing and/or analyses of the Subject Component which relate to, or may relate to, the Alleged Defect in the Subject Vehicles.
PE24-024_Q10_0004_CONF BUS INFO.pdf	000028	000029	Consists of one .pdf containing entire page confidential business information. This file contains testing and/or analyses of the Subject Component which relate to, or may relate to, the Alleged Defect in the Subject Vehicles.
PE24-024_Q10_0005_CONF BUS INFO.pdf	000030	000031	Consists of one .pdf containing entire page confidential business information. This file contains testing and/or analyses of the Subject Component which relate to, or may relate to, the Alleged Defect in the Subject Vehicles.
PE24-024_Q10_0006_CONF BUS INFO.pdf	000032	000033	Consists of one .pdf containing entire page confidential business information. This file contains testing and/or analyses of the Subject Component which relate to, or may relate to, the Alleged Defect in the Subject Vehicles.
PE24-024_Q10_0007_CONF BUS INFO.pdf	000034	000034	Consists of one .pdf containing entire page

			confidential business information. This file contains testing and/or analyses of the Subject Component which relate to, or may relate to, the Alleged Defect in the Subject Vehicles.
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PE24-024_Q10_0010_CONF BUS INFO.pdf	000038	000039	Consists of one .pdf containing entire page confidential business information. This file contains testing and/or analyses of the Subject Component which relate to, or may relate to, the Alleged Defect in the Subject Vehicles.
PE24-024_Q10_0011_CONF BUS INFO.pdf	000040	000040	Consists of one .pdf containing entire page confidential business information. This file contains testing and/or analyses of the Subject

Mr. Peter Simshauser

April 25, 2025

Page -8-

			Component which relate to, or may relate to, the Alleged Defect in the Subject Vehicles.
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PE24-024_Q10_0015_CONF BUS INFO.pdf	000049	000050	Consists of one .pdf containing entire page confidential business information. This file contains testing and/or analyses of the Subject Component which relate to, or may relate to, the Alleged Defect in the Subject Vehicles.

Mr. Peter Simshauser

April 25, 2025

Page -9-

PE24-024_Q10_0016_CONF BUS INFO.pdf	000051	000053	Consists of one .pdf containing entire page confidential business information. This file contains testing and/or analyses of the Subject Component which relate to, or may relate to, the Alleged Defect in the Subject Vehicles.
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PE24-024_Q10_0022_CONF BUS INFO.pdf	000062	00006 3	Consists of one .pdf containing entire page confidential business information. This file contains testing and/or analyses of the Subject Component which relate to, or may relate to, the Alleged Defect in the Subject Vehicles.
PE24-024_Q10_0023_CONF BUS INFO.pdf	000064	00006 5	Consists of one .pdf containing entire page confidential business information. This file contains testing and/or analyses of the Subject Component which relate to, or may relate to, the Alleged Defect in the Subject Vehicles.
PE24-024_Q10_0024_CONF BUS INFO.pdf	000066	00006 7	Consists of one .pdf containing entire page confidential business information. This file contains testing and/or analyses of the Subject Component which relate to, or may relate to, the Alleged

Mr. Peter Simshauser

April 25, 2025

Page -11-

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Mr. Peter Simshauser

April 25, 2025

Page -13-

			Component which relate to, or may relate to, the Alleged Defect in the Subject Vehicles.
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Mr. Peter Simshauser

April 25, 2025

Page -14-

PE24-024_Q10_0038_CONF BUS INFO.pdf	000097	000097	Consists of one .pdf containing entire page confidential business information. This file contains testing and/or analyses of the Subject Component which relate to, or may relate to, the Alleged Defect in the Subject Vehicles.
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Mr. Peter Simshauser

April 25, 2025

Page -18-

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			CONFIDENTIAL BUSINESS INFORMATION."
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Mr. Peter Simshauser

April 25, 2025

Page -20-

PE24-024_Q10_0063_CONF BUS INFO.pdf	000201	000202	Consists of one .pdf containing entire page confidential business information. This file contains testing and/or analyses of the Subject Component which relate to, or may relate to, the Alleged Defect in the Subject Vehicles.
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PE24-024_Q10_0069_CONF BUS INFO.pdf	000279	000281	Consists of one .pdf containing entire page confidential business information. This file contains testing and/or analyses of the Subject Component which relate to, or may relate to, the Alleged Defect in the Subject Vehicles.
PE24-024_Q10_0070_CONF BUS INFO.pdf	000282	000286	Consists of one .pdf containing entire page confidential business information. This file contains testing and/or analyses of the Subject Component which relate to, or may relate to, the Alleged Defect in the Subject Vehicles.
PE24-024_Q10_0071_CONF BUS INFO.pdf	000287	000343	Consists of one .pdf containing entire page confidential business information. This file contains testing and/or analyses of the Subject Component which relate to, or may relate to, the Alleged

Mr. Peter Simshauser

April 25, 2025

Page -22-

			Defect in the Subject Vehicles.
PE24-024_Q10_0072_CONF BUS INFO.pdf	000344	000345	Consists of one .pdf containing entire page confidential business information. This file contains testing and/or analyses of the Subject Component which relate to, or may relate to, the Alleged Defect in the Subject Vehicles.
PE24-024_Q10_0073_CONF BUS INFO.pdf	000346	000348	Consists of one .pdf containing entire page confidential business information. This file contains testing and/or analyses of the Subject Component which relate to, or may relate to, the Alleged Defect in the Subject Vehicles.
PE24-024_Q10_0074_CONF BUS INFO.pdf	000349	000350	Consists of one .pdf containing entire page confidential business information. This file contains testing and/or analyses of the Subject Component which relate to, or may relate to, the Alleged Defect in the Subject Vehicles.
PE24-024_Q10_0075_CONF BUS INFO.pdf	000351	000352	Consists of one .pdf containing entire page confidential business information. This file contains testing and/or analyses of the Subject Component which relate to, or may relate to, the Alleged Defect in the Subject Vehicles.
PE24-024_Q10_0076_CONF BUS INFO.pdf	000353	000360	Consists of one .pdf containing entire page

			confidential business information. This file contains testing and/or analyses of the Subject Component which relate to, or may relate to, the Alleged Defect in the Subject Vehicles.
PE24-024_Q10_0077_CONF BUS INFO.pdf	000361	000361	Consists of one .pdf containing entire page confidential business information. This file contains testing and/or analyses of the Subject Component which relate to, or may relate to, the Alleged Defect in the Subject Vehicles.
PE24-024_Q10_0078_CONF BUS INFO.pdf	000362	000362	Consists of one .pdf containing entire page confidential business information. This file contains testing and/or analyses of the Subject Component which relate to, or may relate to, the Alleged Defect in the Subject Vehicles.
PE24-024_Q10_0079_CONF BUS INFO.pdf	000363	000363	Consists of one .pdf containing entire page confidential business information. This file contains testing and/or analyses of the Subject Component which relate to, or may relate to, the Alleged Defect in the Subject Vehicles.
PE24-024_Q10_0080_CONF BUS INFO.pdf	000364	000367	Consists of one .pdf containing entire page confidential business information. This file contains testing and/or analyses of the Subject

Mr. Peter Simshauser

April 25, 2025

Page -24-

			Component which relate to, or may relate to, the Alleged Defect in the Subject Vehicles.
PE24-024_Q10_0081_CONF BUS INFO.pdf	000368	000370	Consists of one .pdf containing entire page confidential business information. This file contains testing and/or analyses of the Subject Component which relate to, or may relate to, the Alleged Defect in the Subject Vehicles.
PE24-024_Q10_0082_CONF BUS INFO.pdf	000371	000372	Consists of one .pdf containing entire page confidential business information. This file contains testing and/or analyses of the Subject Component which relate to, or may relate to, the Alleged Defect in the Subject Vehicles.
PE24-024_Q10_0083_CONF BUS INFO.pdf	000373	000384	Consists of one .pdf containing entire page confidential business information. This file contains testing and/or analyses of the Subject Component which relate to, or may relate to, the Alleged Defect in the Subject Vehicles.
PE24-024_Q10_0084_CONF BUS INFO.pdf	000385	000386	Consists of one .pdf containing entire page confidential business information. This file contains testing and/or analyses of the Subject Component which relate to, or may relate to, the Alleged Defect in the Subject Vehicles.

Mr. Peter Simshauser

April 25, 2025

Page -25-

PE24-024_Q10_0085_CONF BUS INFO.pdf	000387	000387	Consists of one .pdf containing entire page confidential business information. This file contains testing and/or analyses of the Subject Component which relate to, or may relate to, the Alleged Defect in the Subject Vehicles.
PE24-024_Q10_0086_CONF BUS INFO.pdf	000388	000389	Consists of one .pdf containing entire page confidential business information. This file contains testing and/or analyses of the Subject Component which relate to, or may relate to, the Alleged Defect in the Subject Vehicles.
PE24-024_Q10_0087_CONF BUS INFO.pdf	000390	000394	Consists of one .pdf containing entire page confidential business information. This file contains testing and/or analyses of the Subject Component which relate to, or may relate to, the Alleged Defect in the Subject Vehicles.
PE24-024_Q10_0088_CONF BUS INFO.pdf	000395	000400	Consists of one .pdf containing entire page confidential business information. This file contains testing and/or analyses of the Subject Component which relate to, or may relate to, the Alleged Defect in the Subject Vehicles.
PE24-024_Q10_0089_CONF BUS INFO.pdf	000401	000402	Consists of one .pdf containing entire page confidential business information. This file

			contains testing and/or analyses of the Subject Component which relate to, or may relate to, the Alleged Defect in the Subject Vehicles.
PE24-024_Q10_0090_CONF BUS INFO.xlsx	NA	NA	Consists of one .xlsx containing entire page confidential business information. This file contains testing and/or analyses of the Subject Component which relate to, or may relate to, the Alleged Defect in the Subject Vehicles. The pages for which confidential treatment is being are marked as "ENTIRE PAGE CONFIDENTIAL BUSINESS INFORMATION."
PE24-024_Q10_0091_CONF BUS INFO.pdf	000403	000404	Consists of one .pdf containing entire page confidential business information. This file contains testing and/or analyses of the Subject Component which relate to, or may relate to, the Alleged Defect in the Subject Vehicles.
PE24-024_Q10_0092_CONF BUS INFO.pdf	000405	000425	Consists of one .pdf containing entire page confidential business information. This file contains testing and/or analyses of the Subject Component which relate to, or may relate to, the Alleged Defect in the Subject Vehicles.
PE24-024_Q10_0093_CONF BUS INFO.pdf	000426	000433	Consists of one .pdf containing entire page

			confidential business information. This file contains testing and/or analyses of the Subject Component which relate to, or may relate to, the Alleged Defect in the Subject Vehicles.
PE24-024_Q10_0094_CONF BUS INFO.pdf	000434	000435	Consists of one .pdf containing entire page confidential business information. This file contains testing and/or analyses of the Subject Component which relate to, or may relate to, the Alleged Defect in the Subject Vehicles.
PE24-024_Q10_0095_CONF BUS INFO.pdf	000436	000440	Consists of one .pdf containing entire page confidential business information. This file contains testing and/or analyses of the Subject Component which relate to, or may relate to, the Alleged Defect in the Subject Vehicles.
PE24-024_Q10_0096_CONF BUS INFO.pdf	000441	000459	Consists of one .pdf containing entire page confidential business information. This file contains testing and/or analyses of the Subject Component which relate to, or may relate to, the Alleged Defect in the Subject Vehicles.
PE24-024_Q10_0097_CONF BUS INFO.pdf	000460	000463	Consists of one .pdf containing entire page confidential business information. This file contains testing and/or analyses of the Subject

Mr. Peter Simshauser

April 25, 2025

Page -28-

			Component which relate to, or may relate to, the Alleged Defect in the Subject Vehicles.
PE24-024_Q10_0098_CONF BUS INFO.pdf	000464	000472	Consists of one .pdf containing entire page confidential business information. This file contains testing and/or analyses of the Subject Component which relate to, or may relate to, the Alleged Defect in the Subject Vehicles.
PE24-024_Q10_0099_CONF BUS INFO.pdf	000473	000492	Consists of one .pdf containing entire page confidential business information. This file contains testing and/or analyses of the Subject Component which relate to, or may relate to, the Alleged Defect in the Subject Vehicles.
PE24-024_Q10_0100_CONF BUS INFO.pdf	000493	000493	Consists of one .pdf containing entire page confidential business information. This file contains testing and/or analyses of the Subject Component which relate to, or may relate to, the Alleged Defect in the Subject Vehicles.
PE24-024_Q10_0101_CONF BUS INFO.xlsx	NA	NA	Consists of one .xlsx containing entire page confidential business information. This file contains testing and/or analyses of the Subject Component which relate to, or may relate to, the Alleged Defect in the Subject Vehicles. The pages for

			which confidential treatment is being are marked as "ENTIRE PAGE CONFIDENTIAL BUSINESS INFORMATION."
PE24-024_Q10_0102_CONF BUS INFO.pdf	000494	000495	Consists of one .pdf containing entire page confidential business information. This file contains testing and/or analyses of the Subject Component which relate to, or may relate to, the Alleged Defect in the Subject Vehicles.
PE24-024_Q10_0103_CONF BUS INFO.xlsx	NA	NA	Consists of one .xlsx containing entire page confidential business information. This file contains testing and/or analyses of the Subject Component which relate to, or may relate to, the Alleged Defect in the Subject Vehicles. The pages for which confidential treatment is being are marked as "ENTIRE PAGE CONFIDENTIAL BUSINESS INFORMATION."
PE24-024_Q10_0104_CONF BUS INFO.pdf	000496	000497	Consists of one .pdf containing entire page confidential business information. This file contains testing and/or analyses of the Subject Component which relate to, or may relate to, the Alleged Defect in the Subject Vehicles.
PE24-024_Q10_0105_CONF BUS INFO.pdf	000498	000506	Consists of one .pdf containing entire page

			confidential business information. This file contains testing and/or analyses of the Subject Component which relate to, or may relate to, the Alleged Defect in the Subject Vehicles.
PE24-024_Q10_0106_CONF BUS INFO.pdf	000507	000527	Consists of one .pdf containing entire page confidential business information. This file contains testing and/or analyses of the Subject Component which relate to, or may relate to, the Alleged Defect in the Subject Vehicles.
PE24-024_Q10_0107_CONF BUS INFO.pdf	000528	000527	Consists of one .pdf containing entire page confidential business information. This file contains testing and/or analyses of the Subject Component which relate to, or may relate to, the Alleged Defect in the Subject Vehicles.
PE24-024_Q10_0108_CONF BUS INFO.pdf	000528	000529	Consists of one .pdf containing entire page confidential business information. This file contains testing and/or analyses of the Subject Component which relate to, or may relate to, the Alleged Defect in the Subject Vehicles.
PE24-024_Q10_0109_CONF BUS INFO.pdf	000530	000530	Consists of one .pdf containing entire page confidential business information. This file contains testing and/or analyses of the Subject

Mr. Peter Simshauser

April 25, 2025

Page -31-

			Component which relate to, or may relate to, the Alleged Defect in the Subject Vehicles.
PE24-024_Q10_0110_CONF BUS INFO.pdf	000531	000544	Consists of one .pdf containing entire page confidential business information. This file contains testing and/or analyses of the Subject Component which relate to, or may relate to, the Alleged Defect in the Subject Vehicles.
PE24-024_Q10_0111_CONF BUS INFO.pdf	000545	000545	Consists of one .pdf containing entire page confidential business information. This file contains testing and/or analyses of the Subject Component which relate to, or may relate to, the Alleged Defect in the Subject Vehicles.
PE24-024_Q10_0112_CONF BUS INFO.pdf	000546	000561	Consists of one .pdf containing entire page confidential business information. This file contains testing and/or analyses of the Subject Component which relate to, or may relate to, the Alleged Defect in the Subject Vehicles.
PE24-024_Q10_0113_CONF BUS INFO.pdf	000562	000570	Consists of one .pdf containing entire page confidential business information. This file contains testing and/or analyses of the Subject Component which relate to, or may relate to, the Alleged Defect in the Subject Vehicles.

Mr. Peter Simshauser

April 25, 2025

Page -32-

PE24-024_Q10_0114_CONF BUS INFO.pdf	000571	00057 1	Consists of one .pdf containing entire page confidential business information. This file contains testing and/or analyses of the Subject Component which relate to, or may relate to, the Alleged Defect in the Subject Vehicles.
PE24-024_Q10_0115_CONF BUS INFO.pdf	000572	00057 2	Consists of one .pdf containing entire page confidential business information. This file contains testing and/or analyses of the Subject Component which relate to, or may relate to, the Alleged Defect in the Subject Vehicles.
PE24-024_Q10_0116_CONF BUS INFO.pdf	000573	00057 8	Consists of one .pdf containing entire page confidential business information. This file contains testing and/or analyses of the Subject Component which relate to, or may relate to, the Alleged Defect in the Subject Vehicles.
PE24-024_Q10_0117_CONF BUS INFO.xlsx	NA	NA	Consists of one .xlsx containing entire page confidential business information. This file contains testing and/or analyses of the Subject Component which relate to, or may relate to, the Alleged Defect in the Subject Vehicles. The pages for which confidential treatment is being are marked as "ENTIRE PAGE CONFIDENTIAL"

			BUSINESS INFORMATION."
PE24-024_Q10_0118_CONF BUS INFO.pdf	000579	000604	Consists of one .pdf containing entire page confidential business information. This file contains testing and/or analyses of the Subject Component which relate to, or may relate to, the Alleged Defect in the Subject Vehicles.
PE24-024_Q10_0119_CONF BUS INFO.pdf	000605	000611	Consists of one .pdf containing entire page confidential business information. This file contains testing and/or analyses of the Subject Component which relate to, or may relate to, the Alleged Defect in the Subject Vehicles.
PE24-024_Q10_0120_CONF BUS INFO.pdf	000612	000672	Consists of one .pdf containing entire page confidential business information. This file contains testing and/or analyses of the Subject Component which relate to, or may relate to, the Alleged Defect in the Subject Vehicles.
PE24-024_Q10_0121_CONF BUS INFO.xlsx	NA	NA	Consists of one .xlsx containing entire page confidential business information. This file contains testing and/or analyses of the Subject Component which relate to, or may relate to, the Alleged Defect in the Subject Vehicles. The pages for which confidential treatment is being are marked as

			"ENTIRE PAGE CONFIDENTIAL BUSINESS INFORMATION."
PE24-024_Q10_0122_CONF BUS INFO.pdf	000673	000685	Consists of one .pdf containing entire page confidential business information. This file contains testing and/or analyses of the Subject Component which relate to, or may relate to, the Alleged Defect in the Subject Vehicles.
00128-J36 21JT DASH CHANGE MATRIX_CONF BUS INFO.xlsx	NA	NA	Consists of one .xlsx containing entire page confidential business information. This file contains testing and/or analyses of the Subject Component which relate to, or may relate to, the Alleged Defect in the Subject Vehicles. The pages for which confidential treatment is being are marked as "ENTIRE PAGE CONFIDENTIAL BUSINESS INFORMATION."
00629-J32 - 121 Replacement_CONF BUS INFO.pdf	000686	000686	Consists of one .pdf containing entire page confidential business information. This file contains testing and/or analyses of the Subject Component which relate to, or may relate to, the Alleged Defect in the Subject Vehicles.
00629-J32 - 5403-09373-CCD Technical Soutlion_CONF BUS INFO.pdf	000687	000688	Consists of one .pdf containing entire page confidential business information. This file

Mr. Peter Simshauser

April 25, 2025

Page -35-

			contains testing and/or analyses of the Subject Component which relate to, or may relate to, the Alleged Defect in the Subject Vehicles.
00629-J32 CHANGE MATRIX_CONF BUS INFO.xlsx	NA	NA	Consists of one .xlsx containing entire page confidential business information. This file contains testing and/or analyses of the Subject Component which relate to, or may relate to, the Alleged Defect in the Subject Vehicles. The pages for which confidential treatment is being are marked as "ENTIRE PAGE CONFIDENTIAL BUSINESS INFORMATION."
00709-J13 - 5580-02719-CCD Technical Solution R7_CONF BUS INFO.pdf	000689	00072 2	Consists of one .pdf containing entire page confidential business information. This file contains testing and/or analyses of the Subject Component which relate to, or may relate to, the Alleged Defect in the Subject Vehicles.
00709-J13 CM R8 W MAT WO COST_CONF BUS INFO.xlsx	NA	NA	Consists of one .xlsx containing entire page confidential business information. This file contains testing and/or analyses of the Subject Component which relate to, or may relate to, the Alleged Defect in the Subject Vehicles. The pages for which confidential treatment is being are marked as "ENTIRE PAGE

			CONFIDENTIAL BUSINESS INFORMATION."
00917-J23 - 5403-09707-CCD Technical Solution (2)_CONF BUS INFO.pdf	000723	000731	Consists of one .pdf containing entire page confidential business information. This file contains testing and/or analyses of the Subject Component which relate to, or may relate to, the Alleged Defect in the Subject Vehicles.
00917-J23 CHANGE MATRIX_CONF BUS INFO.xlsx	NA	NA	Consists of one .xlsx containing entire page confidential business information. This file contains testing and/or analyses of the Subject Component which relate to, or may relate to, the Alleged Defect in the Subject Vehicles. Please note that this Excel file is being produced in native format, thus it cannot be marked "Entire Page Confidential." The file name includes "CONF BUS INFO" to designate it as confidential business information.
01008-J16 CHANGE MATRIX REV6_CONF BUS INFO.xlsx	NA	NA	Consists of one .xlsx containing entire page confidential business information. This file contains testing and/or analyses of the Subject Component which relate to, or may relate to, the Alleged Defect in the Subject Vehicles. The pages for which confidential treatment is being are marked as "ENTIRE PAGE CONFIDENTIAL

			BUSINESS INFORMATION."
01008-J16 TECH SOLUTION REV3_CONF BUS INFO.pdf	000732	000752	Consists of one .pdf containing entire page confidential business information. This file contains testing and/or analyses of the Subject Component which relate to, or may relate to, the Alleged Defect in the Subject Vehicles.
01217-J34 - 5403-10024 Technical Solution_CONF BUS INFO.pdf	000753	000759	Consists of one .pdf containing entire page confidential business information. This file contains testing and/or analyses of the Subject Component which relate to, or may relate to, the Alleged Defect in the Subject Vehicles.
01217-J34 CHANGE MATRIX_CONF BUS INFO.xlsx	NA	NA	Consists of one .xlsx containing entire page confidential business information. This file contains testing and/or analyses of the Subject Component which relate to, or may relate to, the Alleged Defect in the Subject Vehicles. The pages for which confidential treatment is being are marked as "ENTIRE PAGE CONFIDENTIAL BUSINESS INFORMATION."
10112-J26 - 5580-02872 21V2B2 DASH TC_CONF BUS INFO.pdf	000760	000767	Consists of one .pdf containing entire page confidential business information. This file contains testing and/or analyses of the Subject

			Component which relate to, or may relate to, the Alleged Defect in the Subject Vehicles.
10112-J26 MATRIX_CONF BUS INFO.xlsx	NA	NA	Consists of one .xlsx containing entire page confidential business information. This file contains testing and/or analyses of the Subject Component which relate to, or may relate to, the Alleged Defect in the Subject Vehicles. Please note that this Excel file is being produced in native format, thus it cannot be marked "Entire Page Confidential." The file name includes "CONF BUS INFO" to designate it as confidential business information.
20427-J23 DASH CM1_CONF BUS INFO.xlsx	NA	NA	Consists of one .xlsx containing entire page confidential business information. This file contains testing and/or analyses of the Subject Component which relate to, or may relate to, the Alleged Defect in the Subject Vehicles. The pages for which confidential treatment is being are marked as "ENTIRE PAGE CONFIDENTIAL BUSINESS INFORMATION."
20427-J23 Technical Solution_CONF BUS INFO.pdf	000768	000793	Consists of one .pdf containing entire page confidential business information. This file contains testing and/or analyses of the Subject Component which relate to,

			or may relate to, the Alleged Defect in the Subject Vehicles.
20427-J24 JT DASH CHANGE MATRIX_CONF BUS INFO.xlsx	NA	NA	Consists of one .xlsx containing entire page confidential business information. This file contains testing and/or analyses of the Subject Component which relate to, or may relate to, the Alleged Defect in the Subject Vehicles. Please note that this Excel file is being produced in native format, thus it cannot be marked "Entire Page Confidential." The file name includes "CONF BUS INFO" to designate it as confidential business information.
20504-J24 - Dash 5403-11267 Change Matrix rev20_CONF BUS INFO.xlsx	NA	NA	Consists of one .xlsx containing entire page confidential business information. This file contains testing and/or analyses of the Subject Component which relate to, or may relate to, the Alleged Defect in the Subject Vehicles. The pages for which confidential treatment is being are marked as "ENTIRE PAGE CONFIDENTIAL BUSINESS INFORMATION."
20504-J24 TECH SOLUTION_CONF BUS INFO.pdf	000794	000805	Consists of one .pdf containing entire page confidential business information. This file contains testing and/or analyses of the Subject

Mr. Peter Simshauser

April 25, 2025

Page -40-

			Component which relate to, or may relate to, the Alleged Defect in the Subject Vehicles.
80320-J83 - 19PSA LHD Dash CM rev10_CONF BUS INFO.xlsx	NA	NA	Consists of one .xlsx containing entire page confidential business information. This file contains testing and/or analyses of the Subject Component which relate to, or may relate to, the Alleged Defect in the Subject Vehicles. The pages for which confidential treatment is being are marked as "ENTIRE PAGE CONFIDENTIAL BUSINESS INFORMATION."
80320-J83 19PSA LHD CHANGES_CONF BUS INFO.pdf	000806	000811	Consists of one .pdf containing entire page confidential business information. This file contains testing and/or analyses of the Subject Component which relate to, or may relate to, the Alleged Defect in the Subject Vehicles.
80405-J15 19PSA RHD ONE PAGER_CONF BUS INFO.pdf	000812	000819	Consists of one .pdf containing entire page confidential business information. This file contains testing and/or analyses of the Subject Component which relate to, or may relate to, the Alleged Defect in the Subject Vehicles.
80405-J15 2019PSA RHD CM REV9_CONF BUS INFO.xlsx	NA	NA	Consists of one .xlsx containing entire page confidential business information. This file

			contains testing and/or analyses of the Subject Component which relate to, or may relate to, the Alleged Defect in the Subject Vehicles. The pages for which confidential treatment is being are marked as "ENTIRE PAGE CONFIDENTIAL BUSINESS INFORMATION."
90327-J11 - model_changes_for_ccd_part1 (1)_CONF BUS INFO.pdf	000820	000834	Consists of one .pdf containing entire page confidential business information. This file contains testing and/or analyses of the Subject Component which relate to, or may relate to, the Alleged Defect in the Subject Vehicles.
90327-J11 - model_changes_for_ccd_part2 (1)_CONF BUS INFO.pdf	000835	000849	Consists of one .pdf containing entire page confidential business information. This file contains testing and/or analyses of the Subject Component which relate to, or may relate to, the Alleged Defect in the Subject Vehicles.
90327-J11 20_21_CM_DASH_WO_COST_CONF BUS INFO.xlsx	NA	NA	Consists of one .xlsx containing entire page confidential business information. This file contains testing and/or analyses of the Subject Component which relate to, or may relate to, the Alleged Defect in the Subject Vehicles. Please note that this Excel file is being produced in native format, thus it cannot be marked "Entire

			Page Confidential." The file name includes "CONF BUS INFO" to designate it as confidential business information.
90806-J17 - 21_vpc_dash_change_matrix_wo_cost_17 (1)_CONF BUS INFO.xlsx	NA	NA	Consists of one .xlsx containing entire page confidential business information. This file contains testing and/or analyses of the Subject Component which relate to, or may relate to, the Alleged Defect in the Subject Vehicles. The pages for which confidential treatment is being are marked as "ENTIRE PAGE CONFIDENTIAL BUSINESS INFORMATION."
90806-J17 - 2021_vp_c_3d_model1_CONF BUS INFO.pdf	000850	000853	Consists of one .pdf containing entire page confidential business information. This file contains testing and/or analyses of the Subject Component which relate to, or may relate to, the Alleged Defect in the Subject Vehicles.
90806-J17 - 5580-02362- CCD_dash_change_matrix (1) (1)_CONF BUS INFO.xlsx	NA	NA	Consists of one .xlsx containing entire page confidential business information. This file contains testing and/or analyses of the Subject Component which relate to, or may relate to, the Alleged Defect in the Subject Vehicles. The pages for which confidential treatment is being are marked as "ENTIRE PAGE CONFIDENTIAL

			BUSINESS INFORMATION."
90924-J21 - 20 JL 3,0L V2 Dash Change matrix - 1_CONF BUS INFO.pdf	000854	000857	Consists of one .pdf containing entire page confidential business information. This file contains testing and/or analyses of the Subject Component which relate to, or may relate to, the Alleged Defect in the Subject Vehicles.
90924-J21 - 20 JL 3,0L V2 Dash Change matrix - 1_CONF BUS INFO.xlsx	NA	NA	Consists of one .xlsx containing entire page confidential business information. This file contains testing and/or analyses of the Subject Component which relate to, or may relate to, the Alleged Defect in the Subject Vehicles. Please note that this Excel file is being produced in native format, thus it cannot be marked "Entire Page Confidential." The file name includes "CONF BUS INFO" to designate it as confidential business information.
90924-J21 20 V2 3,0 DASH - 2_CONF BUS INFO.xlsx	NA	NA	Consists of one .xlsx containing entire page confidential business information. This file contains testing and/or analyses of the Subject Component which relate to, or may relate to, the Alleged Defect in the Subject Vehicles. Please note that this Excel file is being produced in native format, thus it cannot be marked "Entire Page Confidential." The file

			name includes "CONF BUS INFO" to designate it as confidential business information.
90924-J21 20 V2 3,0 DASH_CONF BUS INFO.xlsx	NA	NA	Consists of one .xlsx containing entire page confidential business information. This file contains testing and/or analyses of the Subject Component which relate to, or may relate to, the Alleged Defect in the Subject Vehicles. The pages for which confidential treatment is being are marked as "ENTIRE PAGE CONFIDENTIAL BUSINESS INFORMATION."
PE24-024_CHANGE HISTORY_CONF BUS INFO.pdf	000858	000870	Consists of one .pdf containing entire page confidential business information. This file contains a comprehensive compilation of Subject Component part numbers and their corresponding sales by month and year.
PE24-024_PART SALES_GLADIATOR HARNESS_CONF BUS INFO.pdf	000871	000876	Consists of one .pdf containing entire page confidential business information. This file contains a comprehensive compilation of Subject Component part numbers and their corresponding sales by month and year.
PE24-024_PART SALES_GLADIATOR PS PUMP_CONF BUS INFO.pdf	000877	000879	Consists of one .pdf containing entire page confidential business information. This file contains a comprehensive compilation of Subject

			Component part numbers and their corresponding sales by month and year.
PE24-024_PART SALES_WRANGLER HARNESS_CONF BUS INFO.pdf	000880	000892	Consists of one .pdf containing entire page confidential business information. This file contains a comprehensive compilation of Subject Component part numbers and their corresponding sales by month and year.
PE24-024_PART SALES_WRANGLER PS PUMP_CONF BUS INFO.pdf	000893	000900	Consists of one .pdf containing entire page confidential business information. This file contains information related to the follow-up questions from NHTSA's ODI pertaining to PE19-012.
PE24-024_PART AVAILABILITY-MOPAR_CONF BUS INFO.pdf	000901	000919	Consists of one .pdf containing entire page confidential business information. This file contains System Behavior of the Subject Component which relates to, or may relate to, the Alleged Defect in the Subject Vehicles.
2018-23 HC Topologies_CONF BUS INFO.pdf	000920	000927	Consists of one .pdf containing entire page confidential business information. This file contains System Behavior of the Subject Component which relates to, or may relate to, the Alleged Defect in the Subject Vehicles.
F941 A10 Circuits_CONF BUS INFO.xls	NA	NA	Consists of one .xls containing entire page confidential business information. This file contains System Behavior of the Subject Component

			which relates to, or may relate to, the Alleged Defect in the Subject Vehicles. The pages for which confidential treatment is being are marked as "ENTIRE PAGE CONFIDENTIAL BUSINESS INFORMATION."
Topology EHPS Devices_CONF BUS INFO.pdf	000928	000929	Consists of one .pdf containing entire page confidential business information. This file contains System Behavior of the Subject Component which relates to, or may relate to, the Alleged Defect in the Subject Vehicles.
EHPS Circuits_CONF BUS INFO.xls	NA	NA	Consists of one .xls containing entire page confidential business information. This file contains System Behavior of the Subject Component which relates to, or may relate to, the Alleged Defect in the Subject Vehicles. The pages for which confidential treatment is being are marked as "ENTIRE PAGE CONFIDENTIAL BUSINESS INFORMATION."
EHPS Schematic_CONF BUS INFO.pdf	000930	000930	Consists of one .pdf containing entire page confidential business information. This file contains System Behavior of the Subject Component which relates to, or may relate to, the Alleged Defect in the Subject Vehicles.
DTxForProgramPhase EHPS with Loads_CONF BUS INFO.pdf	000931	000932	Consists of one .pdf containing entire page

Mr. Peter Simshauser

April 25, 2025

Page -47-

			confidential business information. This file contains System Behavior of the Subject Component which relates to, or may relate to, the Alleged Defect in the Subject Vehicles.
EHPS DT65702_CONF BUS INFO.pdf	000933	000934	Consists of one .pdf containing entire page confidential business information. This file contains System Behavior of the Subject Component which relates to, or may relate to, the Alleged Defect in the Subject Vehicles.
2way EHPS Connector Usage Report Ispeed 11-15-2024_CONF BUS INFO .xlsx	NA	NA	Consists of one .xlsx containing entire page confidential business information. This file contains System Behavior of the Subject Component which relates to, or may relate to, the Alleged Defect in the Subject Vehicles. The pages for which confidential treatment is being are marked as "ENTIRE PAGE CONFIDENTIAL BUSINESS INFORMATION."
Vehicle Location_CONF BUS INFO.pdf	000935	000946	Consists of one .pdf containing entire page confidential business information. This file contains System Behavior of the Subject Component which relates to, or may relate to, the Alleged Defect in the Subject Vehicles.
JL-JT Harness Topology 21-23, V2_CONF BUS INFO.pdf	000947	000961	Consists of one .pdf containing entire page confidential business information. This file

Mr. Peter Simshauser

April 25, 2025

Page -48-

			contains System Behavior of the Subject Component which relates to, or may relate to, the Alleged Defect in the Subject Vehicles.
Schematics Devices_CONF BUS INFO.pdf	000962	000977	Consists of one .pdf containing entire page confidential business information. This file contains testing and/or analyses of the Subject Component which relate to, or may relate to, the Alleged Defect in the Subject Vehicles.