

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 17, 2025, FCA US requested an extension for the responses to questions 1, 2, 3, 4, 5, 22, 23 and 24. On April 24, 2025, NHTSA granted this request.
- This initial submission made on April 25, 2025 contains full responses to questions 6, 7, 8, 9, 10, 11, 12, 13, 14, 15, 16, 17, 18, 19, 20 and 21.
- May 9, 2025: This final submission contains full responses to the questions included in the April 17, 2025 extension request; Questions 1, 2, 3, 4, 5, 22, 23, and 24.

1. **State, by model and model year, the number of subject and peer vehicles FCA has manufactured for sale or lease in the United States. Separately, for each subject and peer vehicle manufactured to date by FCA, state the following:**
 - a. **Vehicle identification number (17-character VIN);**
 - b. **Make;**
 - c. **Model;**
 - d. **Model Year;**
 - e. **Engine displacement;**
 - f. **Subject component part number and design version installed as original equipment;**
 - g. **Plant location;**
 - h. **Date of manufacture (MM/DD/YYYY);**
 - i. **Date warranty coverage commenced (MM/DD/YYYY); and**
 - j. **The State in the United States where the vehicle was originally sold or leased, or delivered for sale or lease (postal abbreviation).**

If multiple subject components exist, provide a separate field for each component. If subject components are not associated with a specific VIN, estimate based on the subject component usage start date.

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. **April 25, 2025 Response:** FCA US will submit its response to **Request 1** with the May 9, 2025 Response.

May 9, 2025 Response: FCA US' responses to subparts (a) through (j) of this Request are located in **ENCLOSURE 01** and titled **PE24-024_SUBJECT PRODUCTION DATA.accdb** and **PE24-024_PEER PRODUCTION DATA.accdb**. FCA US notes that the response for subpart (f), for the electric hydraulic power steering pump ("EHPS"), is assumed based on production date compared to Change Notice date. Part traceability is not maintained for electrical harnesses, which limits the ability to identify the exact harness variant used in production due to multiple layers of complexity. In an effort to provide as much supporting information as possible, FCA US is supplementing the response for subpart (f) with a file titled **PE24-024_HARNES USAGE_CONF BUS INFO.pdf**.

The production implementation dates in the attachment from the dash part variants were taken from the relevant wire harness Change Notices ("CNs") which were previously submitted with the April 25, 2025 response in **ENCLOSURE 11**. Where the part number production implementation date is noted as "N/A" the corresponding CN was unrelated to the Alleged Defect in the Subject Components.

2. **State the number of each of the following, received by FCA, or of which FCA is otherwise aware, which relate to, or may relate to, the alleged defect in the subject and peer vehicles:**
 - a. **Consumer complaints, including those from fleet operators;**
 - b. **Field reports, including dealer field reports;**

- c. Reports involving a crash, injury or fatality;
- d. Reports involving a fire or thermal event;
- 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, vehicle location within or outside structure, time of the fire or thermal event, estimated amount of property damage, 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. **April 25, 2025 Response:** FCA US will submit its response to **Request 2** with the May 9, 2025 Response.

May 9, 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 and Peer 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 (g) of this Request. That information is located in **ENCLOSURE 02** and titled **PE24-024_SUBJECT REPORTS.pdf** and **PE24-024_PEER REPORTS.pdf**. For question 2, subparts (c) through (g), FCA US has provided the request for additional information within the database located in **ENCLOSURE 03** and titled **PE24-024_REQUEST NUMBER TWO DATA_SUBJECT.accdb** and **PE24-024_REQUEST NUMBER TWO DATA_PEER.accdb**.

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 is alleged;
- l. Whether a thermal event is alleged;
- m. The vehicle operating conditions when the fire or thermal event was first detected;
- n. 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;
- o. The alleged cause of the fire or thermal event;
- p. A summary of all vehicle modifications or service factors OEM believes could have caused or contributed to the incident;
- q. Whether FCA or FCA contractor/consultant investigated the incident;
- r. FCA or FCA contractor/consultant assessment of the most likely cause of the fire or thermal event;
- s. Whether CT scans, X-ray imagery, or similar imagery were acquired;
- t. Whether video of the incident exists;
- u. Diagnostic trouble codes or other codes present on the vehicle after the fire or thermal event, if available;
- v. Whether property damage is alleged;
- w. Number of alleged injuries, if any;
- x. Number of alleged fatalities, if any; and
- y. 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. **April 25, 2025 Response:** FCA US will submit its response to **Request 3** with the May 9, 2025 Response.

May 9, 2025 Response: FCA US' responses to subparts (a) through (y) of this Request are located in **ENCLOSURE 03** and titled **PE24-024_REQUEST NUMBER TWO DATA_SUBJECT.accdb** and **PE24-024_REQUEST NUMBER TWO DATA_PEER.accdb**.

4. Produce copies of all documents related to each item within the scope of Request No. 2. Organize the documents separately by category (i.e., consumer complaints, field reports, etc.) and describe the method FCA used for organizing the documents. Describe in detail the search methods and search criteria used by FCA to identify the items in response to Request No. 2. 'For each vehicle identified in the responsive data to Request No. 2, provide a complete dealer service history within 6 months of (before and after) the alleged incident or report date (whichever is earliest) and report close date.

A4. **April 25, 2025 Response:** FCA US will submit its response to **Request 4** with the May 9, 2025

Response.

May 9, 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 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 were submitted in the April 25, 2025 response- in **ENCLOSURE 6**. 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**.

The customer complaint summaries are submitted in the file titled **PE24-024_CONSUMER AND CUSTOMER COMPLAINTS-SUBJECT.pdf** and **PE24-024_CONSUMER AND CUSTOMER COMPLAINTS-PEER.pdf** and the related documents are arranged in corresponding folders by complaint number. Legal summaries are contained in the file titled **PE24-024_LEGAL SUMMARIES.pdf**. Field reports are contained in the file titled **PE24-024_FIELD REPORTS-SUBJECT.pdf** and **PE24-024_FIELD REPORTS-PEER.pdf**. Service histories are contained in the files titled **PE24-024_WARRANTY DETAIL-SUBJECT.pdf**, **PE24-024_WARRANTY DETAIL-PEER.pdf**, **PE24-024_REPAIR ORDER DETAIL-SUBJECT.pdf** and **PE24-024_REPAIR ORDER DETAIL-PEER.pdf**.

5. **State, by model and model year, a total count for all of the following categories of claims, collectively, that have been paid by FCA to date that relate to, or may relate to, the alleged defect in the subject and peer vehicles: warranty claims; extended warranty claims; claims for good will services that were provided; field, zone, or similar adjustments and reimbursements; and warranty claims or repairs made in accordance with a procedure specified in a technical service bulletin or customer satisfaction campaign.**
 - a. **Separately, for each such claim, state the following information:**
 - b. **FCA's claim number;**
 - 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. **17-character VIN;**
 - f. **Vehicle's make, model and model year (please use distinct fields for each data type);**
 - g. **Repair date (MM/DD/YYYY);**
 - h. **Vehicle mileage at time of repair (numeric data type);**
 - i. **Repairing dealer's or facility's name, telephone number, city and state or ZIP code (please use distinct fields for each data type);**
 - j. **Labor operation number(s);**
 - k. **Problem code(s);**
 - l. **Diagnostic trouble code(s);**
 - m. **Replacement part number(s) and description(s);**
 - n. **Concern stated by customer;**

- o. Cause as stated on the repair order;**
- p. Correction as stated on the repair order;**
- q. Additional comments, if any, by dealer/technician relating to claim and/or repair; and**
- r. Whether vehicle was repurchased by FCA.**

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. April 25, 2025 Response: FCA US will submit its response to **Request 5** with the May 9, 2025 Response.

May 9, 2025 Response: FCA US' responses to this Request is located in **ENCLOSURE 05** and titled **PE24-024_WARRANTY DATA-SUBJECT.accdb** and **PE24-024_WARRANTY DATA-PEER.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. April 25, 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 as well as Labor Operations Codes ("LOPs"). The key words used can be found in **ENCLOSURE 06** and titled **PE24-024_Q2 KEYWORD SEARCH CRITERIA.pdf**. The LOPs used for this search can be found in **ENCLOSURE 07** and titled **PE24-024_LOP DESCRIPTIONS.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 and peer 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. April 25, 2025 Response: The labor operations descriptions potentially related to the Alleged Defect in the Subject Components are located in **ENCLOSURE 07** and titled **PE24-024_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 **PE24-024_DTCs.pdf**. 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. State, by make and model year, the terms of the new vehicle warranty coverage offered by FCA on the subject and peer vehicles (i.e., the number of months and mileage for which coverage is provided and the vehicle systems that are covered). Describe any extended

warranty coverage option(s) that FCA offered for the subject and peer vehicles and state by option, model, and model year, the number of vehicles that are covered under each such extended warranty.

A8. April 25, 2025 Response: New vehicle warranty coverage offered by FCA US on the Subject Vehicles is:

- Basic Limited Warranty (3 years/36,000 miles),
 - Specified Components (1 year/12,000 miles),
- Corrosion Warranty - Anti-Corrosion Perforation Limited Warranty for All Panels (3 years/Unlimited miles) and Outer Panels (5 years/Unlimited miles),
- Emission Performance Warranty (2 years/24,000 miles),
 - Specified Components (8 years/80,000 miles),
- Powertrain Limited Warranty (5 years/60,000 miles),
- 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 and Peer 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 **PE24-024_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 or subject component(s) in the subject and peer 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.

A9. April 25, 2025 Response: FCA US' responses to this Request are located in **ENCLOSURE 09**.

10. Describe all assessments, analyses, tests, test results, studies, surveys, simulations, investigations, inquiries and/or evaluations (collectively, "actions") that relate to, or may relate to, the alleged defect in the subject vehicles that have been conducted, are being conducted, are planned, or are being planned by, or for, FCA. For each such action, provide the following information:

- a. Action title or identifier;
- b. The actual or planned start date;
- c. The actual or expected end date;
- d. Brief summary of the subject and objective of the action;
- e. Engineering group(s)/supplier(s) responsible for designing and for conducting the action; and
- f. A brief summary of the findings and/or conclusions resulting from the action.

For each action identified, provide copies of all documents related to the action, regardless

of whether the documents are in interim, draft, or final form. Organize the documents chronologically by action.

A10. **April 25, 2025 Response:** FCA US' responses to subparts (a) through (f) of this Request are located in **ENCLOSURE 10** and are summarized in the chart titled **PE24-024_ACTIONS SUMMARY_CONF BUS INFO.pdf**. Copies of responsive related documentary information are included within **ENCLOSURE 10**.

- 11. Describe all modifications or changes made by, or on behalf of, FCA in the design, material composition, manufacture, quality control, supply, or installation of the subject component(s), from the start of production to date. 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.
 - i. 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. **April 25, 2025 Response:** FCA US' responses to subparts (a) through (i) of this Request are located in **ENCLOSURE 11** and titled **PE24-024_CHANGE HISTORY_CONF BUS INFO.pdf**. FCA US is supplementing this response with copies of the referenced Change Matrices. Files are named with the corresponding change notice number.

- 12. State the number of each of the following that FCA has sold that may be used in the subject and peer 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(s); and
 - b. Any kits that have been released, or developed, by FCA for use in service repairs to the subject component(s)/assembly.

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

A12. **April 25, 2025 Response:** FCA US' responses to this Request are located in **ENCLOSURE 12** and

titled **PE24-024_PART SALES_WRANGLER PS PUMP_CONF BUS INFO.pdf**, **PE24-024_PART SALES_GLADIATOR PS PUMP_CONF BUS INFO.pdf**, **PE24-024_PART SALES_WRANGLER HARNESS_CONF BUS INFO.pdf**, **PE24-024_PART SALES_GLADIATOR HARNESS_CONF BUS INFO.pdf** and **PE24-024_SUPPLIER INFORMATION.pdf**. FCA US does not have any other vehicle(s) which contain the identical Subject Component.

13. Regarding acquisition of known subject components possibly related to the alleged defect; 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 the alleged defect; and**
- c. Subject or peer vehicles that have experienced the alleged defect.**

A13. FCA US provides the following response to subparts (a) through (c).

- a. FCA US' response to this Request is located in **ENCLOSURE 13** and titled **PE24-024_PART AVAILABILITY-MOPAR_CONF BUS INFO.pdf**
- b. FCA US' Technical Safety and Regulatory Compliance ("TSRC") office has four power steering pumps in its possession related to the alleged defect.
- c. FCA US' TSRC office has two vehicles in its possession which were repurchased as part of its internal investigation. Upon further investigation and inspection, neither vehicle experienced the alleged defect. One of the vehicles obtained was built for sale or lease in the Canadian market and was repurchased from a Canadian customer.

14. Provide quarterly updates to Requests 2 through 6 until the publication of the closing resume of PE24024.

A14. FCA US continually monitors multiple data sources for incidents that relate to or may relate to the alleged defects. FCA US would propose a review with NHTSA ODI VDD staff to discuss how any relevant reports may be shared with The Agency above and beyond what data is already shared per 49 CFR 579.21.

15. Provide circuit diagrams of the electrical circuit that contains the subject component(s). Include a description of the other components that are powered on the same circuit. Provide for each subject component variant on the subject vehicles, if applicable.

A15. **April 25, 2025 Response:** FCA US' response to this request is located in **ENCLOSURE 15**.

16. Include the schematic of the wiring harness(es) that contain any wiring connected to the subject component(s). Include labels and gauge for each wire. Provide for each engine compartment variant of the subject vehicles, if applicable.

A16. **April 25, 2025 Response:** FCA US' response to this request is located in **ENCLOSURE 16**.

17. Describe the electrical and thermal fault protection used in the subject component circuit and state the gauge and nominal and maximum currents of each wire. Provide for each subject component variant on the subject vehicles, if applicable.

A17. **April 25, 2025 Response:** FCA US' response to this request is located in **ENCLOSURE 17**.

18. Provide diagrams that show the location of the power steering pump module, power steering pump connector, associated wires and wiring harness, and 12-volt battery within the engine compartment of the subject vehicles. Provide diagrams for each engine compartment variant.

A18. **April 25, 2025 Response:** FCA US' response to this request is located in **ENCLOSURE 18**.

19. Identify all components in the subject vehicle engine compartment that receive electrical power when the ignition state is in the 'off' position. Identify the location of each applicable component in the engine compartment and provide their electrical layout (include physical location of component and wires, in addition to wiring diagram).

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

20. Separately, for each vehicle identified in FCA's response to Requests Nos. 3(y) and 5(q) provide FCA's reason for the repurchase of the vehicle. Identify any tests, studies or assessments performed on the vehicles repurchased by FCA. For each item identified, provide copies of all documents related to the item, regardless of whether the documents are in interim, draft, or final form. In addition, provide all documents and correspondence related to each vehicle repurchased by FCA.

A20. **April 25, 2025 Response:** FCA US has repurchased two vehicles (1. Canadian Market VIN not identified in 3(y) or 5(r), 2: VIN 1C4HJXENXNW162509) identified in response to Requests 3(y) and 5(r) for the purpose of investigating potential root cause. All related testing documentation for VIN 1C4HJXENXNW162509 can be found in **ENCLOSURE 10** titled **PE24-024_Q10_0119_CONF BUS INFO.pdf**.

21. Describe how FCA first became aware of alleged defect Part 'a' in the subject vehicles and state the date on which FCA first became aware of the alleged defect. Provide a detailed chronology of all events regarding Part 'a' of the alleged defect in the subject vehicles, starting from the time FCA first became aware of this issue to the date of this Information Request letter.

A21. **April 25, 2025 Response:** FCA US' response to this request is located in **ENCLOSURE 21**.

22. For each subject or peer vehicle engine thermal event where the area around the steering pump has been identified as the possible origin (Alleged defect Part 'a'), answer the following:

- a. Describe why FCA believes the steering pump is the origin;
- b. Describe the manner in which the steering pump failed;
- c. State whether the vehicle was occupied at the time of the thermal event;
- d. If the vehicle was stored inside a garage or adjacent to a structure, state if the structure caught fire or was damaged as a result of the thermal event and whether that structure was

occupied at the time of the thermal event.

A22. April 25, 2025 Response: FCA US will submit their response to **Request 22** with the May 9, 2025 Response.

May 9, 2025 Response:

- a. For the VINs where the origin has been determined to be the power steering pump: FCA US determined the fire originated at the pump based on fire patterns, fire dynamics, and witness statements. All other potential ignition sources were ruled out. See information contained in the files titled **PE24-024_REQUEST NUMBER TWO DATA_SUBJECT.accdb** and **PE24-024_REQUEST NUMBER TWO DATA_PEER.accdb** in **ENCLOSURE 03**.
- b. The cause of the power steering pump failures is currently under investigation.

The responses to subparts (c) and (d) are located in **ENCLOSURE 03** and titled **PE24-024_REQUEST NUMBER TWO DATA_SUBJECT.accdb** and **PE24-024_REQUEST NUMBER TWO DATA_PEER.accdb**.

23. FCA presented information to NHTSA on a series of Wrangler fires with an apparent origin in the engine compartment. At this meeting, FCA presented charts with the only specific origin listed as occurring at the subject component. Provide the following regarding internal activities involving the power steering pump and alleged defect Part 'a' or otherwise stated:

- a. A description of FCA's general investigative process, starting from when FCA has learned of a new vehicle incident through to the final determination and disposition;
- b. A summary that explains how FCA determined the power steering pump connector as the origin and likely cause, as identified in the presentation;
- c. A detailed description of FCA's investigation of non-crash engine compartment fires or thermal events in the subject and peer vehicles involving the subject component(s) to date, including a schedule for completing all ongoing and planned actions;
- d. All causal factors that FCA has considered thus far in its investigation, including any that FCA has eliminated, and describe the evidence that FCA has collected and analyzed for each;
- e. The incident rates and trends of non-crash engine compartment fires or thermal events in the subject vehicles and peer vehicles, both collectively and for any specific causal factors identified in response to 23(d);
- f. Potential for future occurrences of such fire or thermal events caused by the subject component;
 - i. Provide a Weibull analysis or similar, if available;
 - ii. State the number of related failures that are likely to occur for the subject vehicles in 1 year, 3 years, 5 years, and 10 years. Include the percentage of failures that are likely to occur while the vehicle is turned off or unoccupied for each time interval if available.
- g. A description and discussion of the mechanisms preventing other similar incidents from occurring on vehicles equipped with similar power steering pump module; and
- h. State how FCA has determined that the fire or thermal events resulting from a common failure in the steering pump does not constitute an unreasonable risk to motor vehicle safety.

A23. **April 25, 2025 Response:** FCA US will submit their response to **Request 23** with the May 9, 2025 Response.

May 9, 2025 Response:

- a. FCA's general investigation process to identify and investigate alleged fire(s) includes various sub-stages and possible repetition of the below phases. This is the general process, however, individual fire investigations or events may precipitate a variety of unique activities as circumstances dictate. An input is typically received through the FCA US call center, customer care, or the Office of General Counsel
 - i. The Technical Safety and Regulatory Compliance ("TSRC") team determines if an inspection is appropriate in collaboration with other stakeholders
 - ii. If so, an FCA US employee or a third-party inspector is dispatched to conduct the inspection
 - iii. TSRC reviews any information obtained from the inspection. Information is routinely analyzed to determine if the incident is a unique event, explainable event, or part of a potential trend
 - iv. If a trend is detected, TSRC opens an investigation and begins working with engineering and/or suppliers, plants, etc. to determine scope and root cause
 - v. Once an investigation is open, if more fire reports are received, TSRC will attend inspections as appropriate
 - vi. Depending on the circumstances of the investigation, TSRC may attempt to retrieve specific vehicles and/or parts
 - vii. Once vehicle/parts are received, TSRC works with engineering and/or supplier to conduct relevant testing or analysis
 - viii. Vehicle/parts are retained until testing is complete at which time the vehicle/parts may be disposed
 - ix. TSRC continues to monitor the field for incidents, attend inspections, and pursue vehicle/part returns until the investigation is completed
- b. Through its investigation, FCA US was able to determine that there were 10 fires which originated at the pump using the accepted methods outlined in National Fire Protection Association ("NFPA") 921: Guide for Fire and Explosion Investigation. Determination of the origin of vehicle fires involves the analysis derived from one or more of the followingⁱ:
 - i. Fire Patterns: the analysis of effects and patterns left by the fire
 - ii. Fire Dynamics: analysis of the physics and chemistry of fire initiation and growth and interaction between the fire and the vehicle and/or building systems
 - iii. Witness Information: analysis of observation reported by persons who witnessed the fire or were aware of conditions present at the time of the fire.

FCA US determined the fires originated from the power steering pumps based on fire patterns, fire dynamics, and witness statements. All other potential ignition sources were ruled out. In the specific fires where the point of origin was identified to be the EHPSP, FCA US investigators observed that the electrical connector exhibited localized damage and extensive heating. The damage present at the connection is unique, and not present in other fires where the origin was determined to be external to the connection on the EHPSP.
- c. Information related to this request is located in the April 25, 2025 response in **ENCLOSURE 10**
- d. Information related to this request is located in the April 25, 2025 response in **ENCLOSURE 10**
- e. The FCA US fire investigation process subdivides the engine compartment into nine zones when

attributing area or origin. The EHPSP is found in zone 1. In response to this Request, FCA US has calculated the rates of incidents responsive to either Alleged Defect based on the knowledge obtained about each responsive or maybe responsive record. Information related to this request is located in **ENCLOSURE 23** and titled **PE24-024_INCIDENT RATES_CONF BUS INFO.pdf**. Additional information about rates is responded to in subpart f.

- f. FCA US is aware of 10 fires originating from the EHPSP, in a total subject vehicle production population of 806,956 vehicles. The rate is 0.008kppm. A predictive analysis was done using these incidents, and the rate at 10YIS is predicted as 0.002% with 10 future failures. Taking this data into account, the rate would be 0.025kppm. Information related to this request is located in **ENCLOSURE 23** and titled **PE24-024_WEIBULL_CONF BUS INFO.pdf**.
- g. FCA US interprets this Request as asking for information about other FCA US vehicles with a similar EHPSP. The Jeep Wrangler/Gladiator EHPSP is unique and not found in other FCA US products
- h. FCA US' investigation into fires where the EHPSP was the point of origin is ongoing. At this time, FCA US has neither determined that a defect exists nor that one does not exist. Considering all factors relevant to the investigation, including incident rate, severity, and length of time since the last fire where the point of origin was the EHPSP, FCA US' that this condition did not constitute an unreasonable risk to motor vehicle safety was based on the low rate of occurrence.

24. Furnish FCA's assessment of the alleged defect in the subject and peer vehicles addressing alleged defect 'a' and 'b' separately. Include the following:

- a. **The causal or contributory factor(s);**
- b. **The failure mechanism(s);**
- c. **The failure mode(s);**
- d. **If the information requested in a-c are not known by FCA, describe all completed, ongoing and planned actions to determine that information;**
- e. **The risk to motor vehicle safety that it poses;**
- f. **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 any subject component was malfunctioning; and**
- g. **The reports included with this inquiry.**

A24. April 25, 2025 Response: FCA US will submit their response to **Request 24** with the May 9, 2025 Response.

May 9, 2025 Response:

As noted in the response to Request 23, FCA US is in the midst of an ongoing investigation into underhood fires originating in the vicinity of the EHPSP. In response to this Information Request, FCA US searched and reviewed all relevant documents to identify records that relate to or may relate to the Alleged Defect in both Subject and Peer Vehicle populations.

FCA US' investigation determined that there were 10 incidents where a fire originated at the EHPSP. There are an additional 30 incidents where the point of origin appears to be in the same area as the EHPSP but the damage is too extensive to determine precise point of origin. An examination of the under-hood component layout in the Subject Vehicles shows that, in most engine configurations, the majority of potential ignition sources are located in close proximity to the EHPSP. The clustering of potential ignition sources makes identifying the precise point of origin difficult. Furthermore, there are some fires, which FCA US investigators will never be able to determine the point of origin or root cause due to the significant damage.

Jeep Wranglers and Gladiators are widely recognized within the automotive industry for having high rates of owner modification and accessorizing. This vehicle's design and brand identity have cultivated a strong aftermarket culture, leading many owners to personalize their Wranglers to a greater extent than is typical for other vehicle models. During this investigation several underhood fire events were determined to be most likely, or clearly due to improperly installed aftermarket accessories. Lastly, these vehicles have been found on numerous occasions with animal underhood as was found in the vehicle inspected in April, 2025. There have been numerous fire incidents that are likely the result of animal activity in the engine compartment.

- FCA US continues to investigate underhood fires originating in the area of the EHPSP to determine if a common cause can be identified. At this time, the current extremely low rate of occurrence has not supported further action. If FCA US identifies a defect which poses an unreasonable risk to motor vehicle safety, it will take appropriate action at that time.

ⁱ **National Fire Protection Association (NFPA)**. *NFPA 921: Guide for Fire and Explosion Investigations*, 2021 Edition, Section 18.1.2.