

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:

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

Provide the table in Microsoft Access 2010, or a compatible format, entitled "PRODUCTION DATA."

- A1. FCA US' responses to subparts (a) through (k) of this Request are located in **ENCLOSURE 01** and titled **RQ24-001_PRODUCTION DATA.accdb**. Wherever possible, FCA US has provided traceability data associated with the VIN and subject components. Where not available FCA US has left subparts (e) and (f) blank. If this data becomes available in the future, FCA US can supplement the record at that time.
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. Reports involving a thermal event;
 - e. Property damage claims;
 - 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 thermal event, vehicle charge status (percent charge on vehicle or whether vehicle was actively charging), charger type, vehicle charging history, 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, and date on which the complaint or other document initiating the action was filed, and whether emotional distress is alleged by the plaintiff.

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 (g) of this Request. That information is located in **ENCLOSURE 02** and titled **RQ24-001_REPORTS.pdf**. For question 2, subparts (c) through (g), FCA US has provided all relevant and available records in response to question 4.

- 3. Separately, for each item (complaint, report, claim, notice, or matter) within the scope of your response to Request No. 2, state the following information:**
- a. FCA's file number or other identifier used;**
 - b. The category of the item, as identified in Request No. 2 (i.e., consumer complaint, field report, etc.);**
 - c. Vehicle owner or fleet name (and fleet contact person), email address and telephone number (please use distinct fields for each data type);**
 - d. Vehicle owner or fleet street address, city, state (postal abbreviation), and ZIP code (please use distinct fields for each data type);**
 - e. Vehicle's 17-character VIN;**
 - f. Vehicle's make, model and model year (please use distinct fields for each data type);**
 - g. Vehicle's mileage at time of incident (numeric data type);**
 - h. Vehicle's 'battery only' or equivalent, mileage at time of incident (numeric data type);**
 - i. Charge cycles of subject component at time of incident (numeric data type);**
 - j. Incident date (MM/DD/YYYY);**
 - k. Report or claim date (MM/DD/YYYY);**
 - l. Whether a crash is alleged;**
 - m. Whether a thermal event is alleged;**
 - n. Whether thermal event produced a fire;**
 - o. Whether thermal event occurred after 22V077 remedy was installed on the vehicle;**
 - p. Whether the thermal event can be attributed to NHTSA recall numbers 23V753, 20V334, or 18V740, and if so state the recall number;**
 - q. Diagnostic trouble codes or other codes present on the vehicle after the thermal event;**
 - r. Whether property damage is alleged;**
 - s. Number of alleged injuries, if any; and**
 - t. Number of alleged fatalities, if any.**

Provide this information in Microsoft Access 2010, or a compatible format, entitled "REQUEST NUMBER TWO DATA."

A3. FCA US' responses to subparts (a) through (t) of this Request are located in **ENCLOSURE 03** and titled **RQ24-001_REQUEST NUMBER TWO DATA.accdb**.

4. **Produce copies of all documents related to each item within the scope of Request No. 2. Organize the documents separately by category (i.e., consumer complaints, field reports, etc.) and describe the method FCA used for organizing the documents. Describe in detail the search methods and search criteria used by FCA to identify the items in response to Request No. 2. For each vehicle identified in the responsive data to Request No. 2, provide a complete dealer service history.**
- 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 VIN specific Q2 Data Pull using the VINs that were involved in a thermal event related to the reports sought by this IR. The search criteria, as well as the categorization criteria, used in this search is located in **ENCLOSURE 04** and titled **RQ24-001_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 **RQ24-001_CONSUMER AND CUSTOMER COMPLAINTS.pdf** and the related documents are arranged in corresponding folders by complaint number. Legal summaries are contained in the file titled **RQ24-001_LEGAL SUMMARIES.pdf**. Warranty reports are titled **RQ24-001_WARRANTY SERVICE HISTORY.pdf**. Repair Order reports are titled **RQ24-001_RO SERVICE HISTORY.pdf**.
5. **State, by model and model year, a total count for all of the following categories of claims, collectively, that have been paid by FCA to date that relate to, or may relate to, the alleged defect in the subject vehicles: warranty claims; extended warranty claims; claims for good will services that were provided; field, zone, or similar adjustments and reimbursements; and warranty claims or repairs made in accordance with a procedure specified in a technical service bulletin or customer satisfaction campaign.**

Separately, for each such claim, state the following information:

- a. **FCA's claim number;**
- b. **Vehicle owner or fleet name (and fleet contact person), email address and telephone number (please use distinct fields for each data type);**
- c. **Vehicle owner or fleet street address, city, state (postal abbreviation), and ZIP code (please use distinct fields for each data type);**
- d. **17-character VIN;**
- e. **Vehicle's make/model/model year (please use distinct fields for each data type);**
- f. **Repair date (MM/DD/YYYY);**
- g. **Vehicle mileage at time of repair (numeric data type);**
- h. **Repairing dealer's or facility's name, telephone number, city and state or ZIP code (please use distinct fields for each data type);**
- i. **Labor operation number(s);**

- j. **Problem code(s);**
- k. **Diagnostic trouble code(s);**
- l. **Replacement part number(s) and description(s);**
- m. **Concern stated by customer;**
- n. **Cause as stated on the repair order;**
- o. **Whether the thermal event can be attributed to NHTSA recall numbers 23V753, 20V334, or 18V740, and if so state the recall number;**
- p. **Correction as stated on the repair order; and**
- q. **Additional comments, if any, by dealer/technician relating to claim and/or repair.**

Provide this information in Microsoft Access 2010, or a compatible format, entitled "WARRANTY DATA."

A5. FCA US' response to this Request is located in **ENCLOSURE 05** and titled **RQ24-001_WARRANTY DATA.accdb**. DTCs are not stored in a separate database field but may be manually entered by a claim administrator into the narrative(s) of the warranty claim, if available.

6. Describe in detail the search methods and search criteria used by FCA to identify the claims in response to Request No. 5, including the labor operations, problem codes, diagnostic trouble codes, part numbers and any other pertinent parameters used.

A6. 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 **RQ24-001_PRODUCTION PART BUILD INFORMATION_CONF BUS INFO.pdf** and **RQ24-001_SERVICE 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 **RQ24-001_WARRANTY DATA.accdb**. The labor operations descriptions potentially related to the Alleged Defect in the Subject Components are located in **ENCLOSURE 07** and titled **RQ24-001_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 **RQ24-001_DTC DESCRIPTIONS.pdf**. DTCs are not stored in a separate database field but may be manually entered by a claim administrator into the narrative(s) of the warranty claim, if available.

8. State, by make and model year, the terms of the new vehicle warranty coverage offered by FCA on the subject vehicles (i.e., the number of months and mileage for which coverage is provided and the vehicle systems that are covered). Describe any extended warranty coverage option(s) that FCA

offered for the subject vehicles and state by option, model, and model year, the number of vehicles that are covered under each such extended warranty.

A8. New vehicle warranty coverage offered by FCA US on the Subject Vehicles is Basic Limited Warranty (3 years/36,000 miles), Specified Components (1 year/12,000 miles). Limited Emission Warranty PHEV (8 years/100,000 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), High Voltage Battery Limited Warranty – ZEV States (10 years/150,000 miles), Non-ZEV States (8 years/100,00 miles). Federal Emission Warranty (2 years/24,000 miles, Specified Components (8 years/80,000 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 **RQ24-001_SERVICE CONTRACTS_CONF BUS INFO.pdf**.

9. Produce copies of all service, warranty, and other documents that relate to, or may relate to, the alleged defect in the subject vehicles, that FCA has issued to any dealers, regional or zone offices, field offices, fleet purchasers, or other entities. This includes, but is not limited to, bulletins, advisories, informational documents, training documents, or other documents or communications, with the exception of standard shop manuals. Also include the latest draft copy of any communication that FCA is planning to issue within the next 120 days.

A9. FCA US' responses to this Request are located in **ENCLOSURE 09**.

10. Describe all assessments, analyses, tests, test results, studies, surveys, simulations, investigations, inquiries and/or evaluations (collectively, "actions") that relate to, or may relate to, the alleged defect involving the subject component on the subject vehicles or TSB 18-001-18, that have been conducted, are being conducted, are planned, or are being planned by, or for, FCA. For each such action, provide the following information:

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

For each action identified, provide copies of all documents related to the action, regardless of whether the documents are in interim, draft, or final form. Organize the documents chronologically by action.

A10. FCA US' responses to subparts (a) through (f) of this Request are located in **ENCLOSURE 10** and are summarized in the chart titled **RQ24-001_ACTIONS**

SUMMARY_CONF BUS INFO.pdf. Copies of responsive related documentary information are included within **ENCLOSURE 10**.

11. Describe all modifications or changes made by, or on behalf of, FCA in the design, material composition, manufacture, quality control, supply, or installation of the subject component, from the start of production to date, which relate to, or may relate to, the alleged defect in the subject vehicles. For each such modification or change, provide the following information:

- a. The date or approximate date on which the modification or change was incorporated into vehicle production;
- b. A detailed description of the modification or change;
- c. The reason(s) for the modification or change;
- d. The part number(s) (service and engineering) of the original component;
- e. The part number(s) (service and engineering) of the modified component;
- f. Whether the original unmodified component was withdrawn from production and/or sale, and if so, when;
- g. When the modified component was made available as a service component; and
- h. Whether the modified component can be interchanged with earlier production components.

Also, provide the above information for any modification or change that FCA is aware of which may be incorporated into vehicle production within the next 120 days.

A11. FCA US' responses to subparts (a) through (h) of this Request are located in **ENCLOSURE 11** and titled **RQ24-001_CHANGE HISTORY_CONF BUS INFO.pdf**.

12. State the number of each of the following that FCA has sold that may be used in the subject vehicles by component name, part number (both service and engineering/production), model and model year of the vehicle in which it is used and month/year of sale (including the cutoff date for sales, if applicable):

- a. Subject component; and
- b. Any kits that have been released, or developed, by FCA for use in service repairs to the subject component/assembly.

For each 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 or substantially similar component, whether installed in production or in service, and state the applicable dates of production or service usage.

A12. FCA US' responses to this Request is located in **ENCLOSURE 12** and titled **RQ24-001_PART SALES_CONF BUS INFO.pdf** and **RQ24-001_SUPPLIER INFORMATION.pdf**. FCA US has no substantially similar components.

13. Provide information concerning diagnostic parameters related to the subject recall remedy, including the following:

- a. Explanation of diagnostic;
- b. Rationale behind diagnostic selection;

- c. Estimated time between diagnostic trigger as implemented in the subject recall remedy and possible thermal event;
- d. Diagnostic value that triggers a hardware repair compared to nominal value;
- e. Whether similar diagnostic triggers have been installed in vehicles built outside of the recall subject population;
- f. Whether diagnostic parameters would have triggered any fault prior to subject recall;
 - i) List fault name and description, including driver notification; and
 - ii) Diagnostic value that would trigger respective fault.

A13. FCA US' response to this Request is located in **ENCLOSURE 13**.

14. Provide a detailed chronology of all events related to the alleged defect; to include events involving the post recall root cause investigation.

A14. FCA US' response to this Request is located in **ENCLOSURE 14**.

15. Provide a list of all subject components equipped on subject vehicles that have been inspected, tested, evaluated, or assessed by FCA or suppliers that relate to, or may relate to the alleged defect, or due to the presence of any symptom or activated diagnostic trigger associated with the subject recall or alleged defect. For each item, provide the following:

- a. FCA's file number or other identifier used;
- 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. Vehicle's make, model and model year (please use distinct fields for each data type);
- e. Vehicle's VIN;
- f. Date subject component was replaced, if applicable;
- g. Subject component date of build;
- h. Subject component part number and part serial number (identifying marking);
- i. Subject recall software remedy diagnostic trigger detected; if applicable;
- j. Date subject recall remedy was installed on the vehicle, if applicable;
- k. Whether subject component was analyzed by FCA or supplier;
- l. Vehicle mileage at subject component replacement; if applicable;
- m. Battery-only electric miles at subject component replacement; if applicable;
- n. Charge cycles of battery at time of replacement; if applicable;
- o. Battery state of charge at time of incident or when diagnostic trigger was set; if available;
- p. Description of charger type, if available;
- q. DTCs or other problem codes recorded at time of subject component replacement; and
- r. Other anomalies detected, if available.

Additionally, produce copies of all documents related to each item within the scope of Request No. 15. Provide complete dealer service history and customer complaints history associated to each item within the scope of Request No. 15. Organize the documents separately by vehicle VIN.

A15. FCA US' responses to this Request is located in **ENCLOSURE 15** and titled **RQ24-001_DATA TABLE_CONF BUS INFO.pdf** and copies have been provided.

- 16. Provide information concerning the subject component, to include the following:**
- a. Diagrams and description of battery pack dimensions, internal layout, to include descriptions of each significant internal component or subsystem;**
 - b. Failure Mode and Effects Analysis (FMEA) related to the alleged defect; and**
 - c. Design Verification Plan and Report (DVP&R), or similar qualification report, for the subject component.**

A16. FCA US' response to Request 16a is located in **ENCLOSURE 16**. FCA US does not have material for Request subpart (b) as all FMEA was performed by the supplier. FCA US' response to 16a is located in **ENCLOSURE 16**. Documents related to FCA US' response to subpart (c) are located in **ENCLOSURE 10**.

- 17. Provide information concerning battery cells contained within the subject component, to include the following:**
- a. Cell dimensions;**
 - b. Voltage;**
 - c. Charge capacity;**
 - d. Chemistry;**
 - e. Internal layout of cell;**
 - f. Expected lifespan for normal and exceptional use (designed 95th percentile or similar);**
 - g. Manufacturing process;**
 - h. Manufacturing location; and**
 - i. Cells with substantially similar specifications used in other FCA products.**

A17. FCA US' response to Request 17 is located in **ENCLOSURE 17**. Additional information related to this request can be found in response to Request 16 and located in **ENCLOSURE 16**.

- 18. Furnish FCA's assessment of the alleged defect in the subject vehicles, including:**
- a. The causal or contributory factor(s);**
 - b. The potential failure mechanism(s);**
 - c. The potential 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.**

A18. In February 2022, FCA US reviewed the relevant information as part of its investigation into fire events that appeared to originate, in or around, the high voltage battery. On February 6, 2022 the Vehicle Regulations Committee ("VRC") determined that some 2017-2018 model year ("MY") Chrysler Pacifica Plug-In Hybrid Electric Vehicles ("PHEVs") have experienced fires. The defect has not yet been identified and the root cause of these fires is still being investigated. The potentially affected vehicle production period began on August 12, 2016, when production of Chrysler Pacifica PHEVs began, and ended on August 7, 2018, when 2018 MY production ended. The suspect population was determined using vehicle manufacturing records. Similar vehicles not included in this recall are not PHEVs or were built after the suspect vehicle production period.

Since that time, a multidisciplinary team at FCA US has continued its investigation in collaboration with LG Energy Solutions ("LGES") to identify root cause. On November 30, 2023, FCA US facilitated a meeting between NHTSA's Office of Defects Investigation and LGES to provide a full briefing on the status of that investigation. At the time of this submission, FCA US continues to investigate factors which may contribute to, or result in a fire in the subject components. The working root cause hypothesis requires, at a minimum, either a folded or torn anode tab which, during multiple charging-discharging cycles, creates the buildup of lithium byproduct.

The identification of the folded or torn anode tab led LGES to institute a production process update for the 2020 MY to scan for anode tab abnormalities using digital photometry technology. FCA US is currently investigating whether the process change would lead to the adjustment of the current scope of recall 22V-077(Z11).

Updated diagnostic software, released as the remedy for recall 22V-077(Z11) has helped identify and replace 1,031 battery packs with cell behavior anomalies. This software was also put into new vehicle production starting on July 14, 2023 as a running change for the 2023 MY. Since that time, there has only been one incident outside of the 22V-077(Z11) population and neither FCA US, nor LGES has been able to validate if there was a torn or folded tab.

FCA US and LGES continue the investigation into root cause of fire events originating in or around the subject component. This investigation has been ongoing since 2021. Efforts include, but are not limited to weekly meetings, multiple larger workshops, battery pack collection, tear-down, and analysis by cross functional teams. Pending new learnings and/or the identification of the complete root cause, FCA US will take appropriate action if there is a need to update either the recall scope, the recall remedy, or both.