

Preliminary Statement

On April 30, 2009, Chrysler LLC, the entity that manufactured and sold the certain vehicles that may be discussed in this Information Request, filed a voluntary petition for relief under Chapter 11 of Title 11 of the United States Bankruptcy Code.

On June 10, 2009, Chrysler LLC sold substantially all of its assets to a newly formed company later known as FCA. Pursuant to the sales transaction, FCA assumed responsibility for safety recalls pursuant to the 49 U.S.C. Chapter 301 for vehicles that were manufactured and sold by Chrysler LLC prior to the June 10, 2009, asset sale.

On June 11, 2009, Chrysler LLC changed its name to Old Carco LLC. The assets of Old Carco LLC that were not purchased by FCA, as well as the liabilities of Old Carco that were not assumed, remain under the jurisdiction of the United States Bankruptcy Court – Southern District of New York (In re Old Carco LLC, et al., Case No. 09-50002).

Effective December 15, 2014, FCA changed its name to FCA US LLC (“FCA US”).

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- **May 1, 2026:** This supplemental submission is in response to a new Information Request letter issued by NHTSA on March 27, 2026. FCA US provided the original response on May 3, 2024. FCA US is not copying or reproducing its prior response or enclosures from that response here. As part of the updated information request, NHTSA has updated the Subject Vehicles to add new model years and the Subject Recall to include the new recalls, in addition to the new requests. FCA US makes this response with data up to and including March 27, 2026 unless otherwise stated.
 - Regarding the Subject Recall. NHTSA identified the Subject Recall as 24V-538. FCA US has also released 24V-536 which is for the same issue and has the same remedy as 24V-538 but for different vehicle model years. Unless otherwise stated, FCA US is responding for both.
 - Clarification of Subject Recalls and related recalls
 - **22V-077 (Z11)** – Recall of 2017–2018 MY Pacifica PHEV vehicles; Approved 2/6/2022.
 - **24V-538 (72B)** – Re-recall of 2017–2018 MY Pacifica PHEV vehicles for an ineffective remedy; Approved 7/11/2024.
 - **24V-536 (73B)** – Expansion of the recall to include 2019–2021 MY Pacifica PHEV vehicles; Approved 7/11/2024.

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 or updated Recall 22V-077 recall remedy (73B) was installed on the vehicle, if applicable;
 - h. Date initial Recall 22V-077 recall remedy (Z11) was installed on the vehicle, 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 this Request are located in **ENCLOSURE 01** and titled **RQ24-001-02_PRODUCTION DATA.accdb**.

2. State the number of each of the following, received by FCA, or of which FCA is otherwise aware, which relate to, or may relate to, the alleged 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.

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 the 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 in the Subject Component. 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 **RQ24-001-02_REPORTS.pdf**. For Request No. 2, subparts (c) through (g), FCA US is providing all relevant and available records in response to Request No. 4, below.

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 the subject recall remedy or updated Recall 22V-077 remedy was installed on the vehicle;
- p. Whether the thermal event can be attributed to NHTSA recall numbers 23V7-53, 20V-334, or 18V-740, and if so state the recall number;
- q. Whether property damage is alleged;
- r. Number of alleged injuries, if any; and
- s. Number of alleged fatalities if any.

Provide this information in Microsoft Access 2010, or a compatible format, entitled "REQUEST NUMBER TWO DATA." A pre-formatted data collection file, which provides further details regarding this submission, will be provided to you.

A3. FCA US' responses to subparts (a) through (s) of this Request are located in **ENCLOSURE 03** and titled **RQ24-001-02_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. FCA US monitors customer complaints and field reports daily. All allegations of high voltage ("HV") battery thermal event are reviewed by a FCA US Technical Safety and Regulatory Compliance ("TSRC") investigator. Where desirable and feasible, conduct a hands-on physical inspection of the vehicle. Responsive documents related to each item within the scope of Request No. 2 were gathered, inter alia, from FCA US systems that capture and catalogue fire events by the VIN based on customer complaints and field reports. 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 and field report summaries are submitted in files titled **RQ24-001-02_CUSTOMER_FIELD.accdb** and the related documents are arranged in corresponding folders by complaint number. Non-privileged legal summaries are contained in files titled **RQ24-001-02_LEGAL SUMMARIES.pdf**. Service histories are contained in the file titled **RQ24-001-02_SERVICE HISTORY.accdb**.

- 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.**

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 23V-753, 20V-334, or 18V-740, 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 **RQ24-001-02_WARRANTY DATA.accdb**. DTCs are not stored in a separate database field and may be manually entered by a claim administrator into the narrative(s) of the warranty claim.

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 response to Request No. 5, FCA US searched the normal repositories of information potentially responsive to this Request utilizing a service part number search. The service part numbers used for this search can be found in **ENCLOSURE 06** and **RQ24-001-02_SERV PART_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 that relate to, or may relate 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, labor operation descriptions, that relate to or may relate to the Alleged Defect in the Subject Vehicles are located in **ENCLOSURE 07** and titled **RQ24-001-02_LOP.pdf**. The problem codes, problem code descriptions, diagnostic trouble codes and diagnostic trouble code descriptions that relate to or may relate to the Alleged Defect in the Subject Vehicles are also located in **ENCLOSURE 07** and titled **RQ24-001-02_DTC.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). Provide warranty coverage information for the subject component. 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 Limited Warranty (“NVLW”) 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), HV 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, are provided by option, model and model year located in the table included in **ENCLOSURE 08** and titled **RQ24-001-02_SERV CONT_CONF BUS INFO.xlsx**. FCA US offers unlimited time and mileage extended warranty coverage on the HV Battery for the affected population contained in 24V-536 and 24V-538.

- 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 in the subject vehicles that have been conducted, are being conducted, are planned, or are being planned by, or for, FCA. Provide responsive information related to vehicles and subject components acquired by FCA or suppliers.**

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 **RQ24-001-02_ACT SUM_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 **RQ24-001-02_CH HIST_CONF BUS INFO.pdf**.

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

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

the kit part number and the part number of the subject component. 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 **RQ24-001-02_PART SALES_CONF BUS INFO.pdf** and **RQ24-001-02_SUPPLIER.pdf**. FCA US has no substantially similar components.

13. Provide information concerning diagnostic parameters related to the subject recall remedy and updated the Recall 22V-077 remedy, including the following:

- a. **Describe how the software update mitigates the alleged defect;**
- b. **Explanation of diagnostic;**
- c. **Rationale behind diagnostic selection;**
- d. **Estimated time between diagnostic trigger and possible thermal event;**
- e. **Diagnostic value that triggers a hardware repair compared to nominal value;**
- f. **Whether similar diagnostic triggers have been installed in vehicles built outside of the recall subject population; and**
- g. **Whether diagnostic parameters would have triggered any fault prior to subject recall remedy and updated Recall 22V-077 remedy. For each parameter, provide a description, including value that would trigger the fault and any driver notification upon trigger.**

A13. FCA US' responses to this Request:

- a. The LGES Diagnostics in Recall 24V-538 (72B) remedy software (version 2.0) was enhanced to screen out possible remaining anode tab defects in the field before the risk of a thermal incident. Software version 2.0 enhancements included changes to redefine the thresholds for Delta State of Health ("dSOH") and Moving Average Voltage Deviation ("MAVD"), improving the sensing capability of Relaxation Delta Voltage ("RDV") to improve monitoring for excessive discharge. Also, an Electrically Erasable Programmable Read-only Memory ("EEPROM") reset issue was addressed. Finally, a new feature of Long Relaxation Delta Voltage ("LRDV") was introduced based on a read-across from other applications to monitor slight self-discharge over 70 days. These changes adjust the thresholds to the noted diagnostics based on learnings from incidents identified after the 22V-077 (Z11) recall remedy. When set, these diagnostic trouble codes illuminate a MIL and prevent the HV battery from being charged. The vehicle remains drivable using the internal combustion engine but must have a new HV battery installed, after which, normal charging may resume.
- b. See file contained in **ENCLOSURE 10** titled **RQ24-001_Q10_0007_CONF BUS INFO.pdf**
- c. See file contained in **ENCLOSURE 10** titled **RQ24-001_Q10_0007_CONF BUS INFO.pdf**
- d. The purpose of the updated software is to prevent thermal events. There is no estimate for time between setting one of these new DTC's and a thermal event. The intent is that no thermal event occurs.
- e. See file contained in **ENCLOSURE 10** titled **RQ24-001_Q10_0007_CONF BUS INFO.pdf**
- f. Similar diagnostic software has been installed on Chrysler Pacifica PHEV vehicles produced starting on July 14, 2023 and continuing through the end of production. In addition, Jeep

Wrangler PHEV and Jeep Grand Cherokee PHEV also have diagnostic software which analyze various inputs from the respective HV battery systems have similar fault reactions if set.

- g. FCA US believes that NHTSA is asking whether the Software 2.0 diagnostic parameters would have triggered any fault prior to the 24V-538 (72B) and updated Recall 22V-077 (24V-536(73B)) remedy being installed on a vehicle. If that is the case, the Software 2.0 diagnostics were defined based on analysis and review and analysis of post 22V-077 (Z11) repair incidents. The intent of the update is to ensure that incidents such as those would be identified and further charging inhibited.

14. Provide the following information related to the subject recall remedy and updated Recall 22V-077 remedy:

- a. **Provide a detailed technical explanation for the high-voltage battery temperature and charge conditioning requirements specified in the remedy instructions;**
- b. **What messages, warnings, or vehicle performance adjustments occur when the diagnostic triggers associated with the recall remedy are active?;**
- c. **Are the diagnostic triggers associated with the recall remedy unique to the alleged defect?;**
- d. **After the diagnostic triggers associated with the recall remedy activate, what is the permanent repair? Is this repair covered under warranty?**

A14. FCA US' response to this Request:

- a. To help ensure the entire procedure could be completed during the first attempt regardless of ambient conditions, a note was added to the repair instructions stating that the *"high voltage battery pack must maintain not less than (50°F)(10°C) temperature environment during testing and wiTECH routine, failure to maintain the temperature may cause repeat testing."* To enable the diagnostic, battery cells must be between 60°and 70°F (15.5° to 21.1°C). The software flash also requires a warm pack as it checks the State of Charge ("SOC") during the process. For this reason, a note was added to the repair instructions informing that *"If you are currently in a colder climate, please run the Battery Warming Procedure Before flashing the BPCM."* The integrity procedure is specifically designed to walk the dealership technician through the enable criteria of the remedy diagnostic. This allows the diagnostic to enable and set the MIL to active at the dealer immediately for those HV Batteries that are at risk and in need of an HV Battery replacement.
- b. If any of the diagnostic thresholds are met, customers will experience a Malfunction Indicator Lamp ("MIL") illumination which would correspond with one or more of the following Diagnostic Trouble Codes ("DTCs") in the Battery Pack Control Module: A) POEDD-00 - Hybrid/EV Battery Pack "B" Deterioration, B) POBBE-00 - Hybrid Battery Pack Voltage Variation, C) P1C5E-00 - Battery State Of Health Failed. Messages, warnings, and vehicle performance reactions are identified in Table 1 below.

DTC Text	DTC Code	Battery Reaction	Vehicle Reaction
Cell SOH Delta	P1C5E-00	All SOC: HV battery will report not ready for charging.	All SOC: MIL on. Charging will be terminated / not permitted. "Service Charging System" displayed in cluster
Cell Moving Average Voltage Deviation (MAVD)	POEDD-00	In addition to above IF HV Battery crosses above SOC > 70%: The battery will set both charging and discharging power limits to 3kW.	In addition to above IF HV Battery crosses above SOC > 70%: Turtle light on the dashboard will be active. "Vehicle Speed May Be Limited" displayed in cluster
Relaxation Delta Voltage (RDV)	POBBE-00		Vehicle will drive with significant power restrictions (low speed, limp only).

Table 1: Diagnostic fault codes and vehicle reactions

- c. 1The diagnostics may identify a variety of cell conditions in addition to the Alleged Defect.
- d. After the diagnostic triggers associated with the recall remedy activate, the permanent remedy is to replace the HV battery. The remedy is covered under the existing vehicle warranties until expiration. Once existing warranty expires, the HV Battery is covered under Warranty Extension XT1, providing unlimited time and unlimited mileage coverage.

15. Provide a detailed chronology of all events related to the alleged defect; to include events involving the post recall root cause investigation and expansion of vehicle scope through the subject recall.

A15. FCA US' response to Request No. 15:

- On August 31, 2021, the FCA US LLC ("FCA US") Technical Safety and Regulatory Compliance organization opened an investigation as a result of detecting a potential trend in fires in certain Chrysler Pacifica PHEVs potentially originating in the center of the vehicle underbody.
- From September 2021 to January 2022, FCA US repurchased two incident vehicles for origin and cause investigation. The cause of these fires is under investigation.
- As of February 4, 2022, FCA US was aware of ten additional fires. The cause of these fires is under investigation.
- As of February 4, 2022, FCA US identified five customer records, zero warranty claims, and 12 field reports potentially relating to this issue for all markets with dates of receipt ranging from April 23, 2019, to December 14, 2021.
- As of February 4, 2022, FCA US was not aware of any accidents or injuries potentially relating to this issue for all markets.
- As of February 21, 2022, FCA US had not made a determination of whether the HV battery pack assembly is defective and/or the root cause of these fires.
- On February 06, 2022, FCA US determined, through the Vehicle Regulations Committee, to conduct a voluntary safety recall of the affected vehicles.

- Since February 6, 2022, when recall 22V-077 (Z11) was launched, FCA US and LG Energy Solution ("LGES") has worked to determine root cause. This includes, but is not limited to, the analysis of field reports and vehicle buybacks, vehicle data, thermal reproduction tests, and battery pack teardowns.
- On November 23, 2022, the FCA US TSRC organization was notified of a HV battery fire in a Chrysler Pacifica PHEV which received the remedy for 22V-077 (Z11). FCA US TSRC is awaiting a second examination of the vehicle and HV battery pack.
- From June 2023, through December 2023, FCA US TSRC was made aware of five additional fires originating from the HV battery in some Chrysler Pacifica PHEVs which received the Z11 remedy. FCA US TSRC attempted to repurchase these vehicles for further analysis to determine if the recall remedy was effective.
- In August of 2023, FCA US was notified of a 2021MY Chrysler Pacifica PHEV which experienced a fire originating from the HV battery. FCA US discovered the cells in this pack were built on a different line at LGES than those that are subject to the recalls. FCA US and LGES inspected the vehicle. The battery pack was returned to LGES for analysis.
- In April 2024, FCA US was notified of a Chrysler Pacifica PHEV which allegedly experienced a fire originating from the HV battery pack after receiving the 22V-077 (Z11) remedy. The battery pack was returned to LGES for further analysis, and they confirmed the presence of a torn anode tab in one of the cells in the battery pack. A second factor was not identified. This discovery also confirmed that the 22V-077 (Z11) remedy may not be 100% effective.
- On April 30, 2024, the FCA US TSRC organization opened an investigation into some 2017-2018 Chrysler Pacifica PHEVs experiencing fires originating from the HV battery after having the remedy for 22V-077 (Z11) completed.
- In April 2024, FCA US identified additional Chrysler Pacifica PHEVs which may have been built with a folded or torn anode tab.
- On April 9, 2024, LGES provided FCA US with the battery teardown and CT analysis report of the 2021MY vehicle which had a fire in August of 2023. The results were inconclusive and LGES was in the process of beginning the cell teardown.
- On May 23, 2024, the FCA US TSRC organization opened an investigation into 2019-2021 Chrysler Pacifica PHEV vehicles potentially built with a HV battery pack which may contain suspect cells manufactured with a folded or torn anode tab, plus another factor.
- As of June 12, 2024, LGES communicated to FCA US that the most likely root cause of recall 22V-077 (Z11) is a folded or torn anode tab plus another factor.
- As of June 12, 2024, FCA US was aware of seven customer assistance records, zero warranty claims, and seven field reports potentially relating to this issue for all markets with dates of receipt ranging from November 23, 2022, to April 15, 2024.
- As of June 12, 2024, FCA US was aware of zero accidents and four injuries potentially related to this issue for all markets.

- On July 11, 2024 FCA US determined, through the Vehicle Regulations Committee, to conduct a voluntary safety recall of the affected vehicles.
- In August of 2024, FCA US was notified of a 2020MY Chrysler Pacifica PHEV which experienced a fire originating from the HV battery. FCA US learned the cells in this pack were built on a different line than those subject to the recalls, and the same line as the 2021MY Chrysler Pacifica. FCA US has not had access to this vehicle for further investigation.
- From November 2024 through February 2025, FCA US validated software remedy with vehicle mileage accumulation and software validation. Change Management documents were processed for release to dealer.
- On December 4, 2024, FCA US launched the remedy for 24V-536 (73B) into service for dealers.
- In January 2025, LGES provided FCA US with the final battery and cell analysis report of the 2021MY vehicle. LGES did not find a folded or torn anode tab in the pack. The current LGES assessment is that the battery coolant heater was the cause of the incident due to damage it caused to the battery, however, the investigation continues.
- On February 26, 2025, LGES provided a replication test report for external surge conducted at the pack level. Cell damage was observed on the electrode edge, but damage does not match returned field cases.
- On February 27, 2025, FCA US launched the remedy for 24V-538 (72B) into service for dealers.
- Between February 2025 and September 2025, FCA US met regularly with LGES to review data and part returns from the recall in an effort to determine root cause.
- In July of 2025, FCA US was notified of a third vehicle which allegedly experienced a HV battery fire with cells manufactured on a different line than those subject to the recalls. FCA US has made multiple attempts to inspect the vehicle and has not been given access to the vehicle for further investigation. FCA US has been working with LGES to investigate the fires from the other cell manufacturing line. LGES has offered no theory on the root cause of those fires.
- Between July 2025 and August 2025, FCA US and LGES attended the inspection of a Chrysler Pacifica PHEV with fire originating from the HV battery; LGES' analysis was provided to FCA US. FCA US does not currently have access to investigate the battery further with LGES.
- On September 24, 2025, LGES provided a replication test regarding report pouch puncture and short circuit conducted at pack level. The test was run multiple times and did not result in a thermal runaway condition.
- From November 2025 to December 2025, FCA US conducted a vehicle level surge test. No effects were noted or observed during the surge testing.
- In December of 2025, FCA US received a Chrysler Pacifica PHEV which allegedly experienced a fire originating from the HV battery after having the remedy for 22V-077 (Z11) completed. The vehicle was buried in sand which was frozen and is in the process of being cleaned out in order to safely put the vehicle on a hoist for removal of the HV battery. The battery will then be sent to LGES for teardown analysis.

- From Jan 2026 to February 2026, LGES conducted cell to module short reproduction test. The cells maximum temperature was low and no cell damage was observed.
- On March 30, 2026, LGES started cell and module cycle testing using a similar cell made with anode torn tab and foreign particles defects.
- As of April 2026, LGES has communicated the root cause is a folded or torn anode tab plus another unidentified external short. Thus far, no reproduction test has demonstrated that either of the defects can cause a fire, nor has any reproduction test identified where the external short is coming from.
- As of April 2026, LGES has not identified two defects existing simultaneously within any pack that has been returned through either recall remedy action.
- As of April 2026, FCA US continues to work with LGES to determine the root cause of the fires.
- As of April 2026, FCA US continues to work with LGES to investigate the three fires from the other cell manufacturing line to determine root cause.

16. 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 updated Recall 22V-077 remedy, 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 or updated Recall 22V-077 remedy diagnostic trigger detected; if applicable;
- j. Date subject recall remedy or updated Recall 22V-077 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 applicable.

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

A16. Documents responsive to Request No. 16 are also responsive to Request No. 10 and FCA US' responses to this Request are located in **ENCLOSURE 10** and are indexed accordingly. The information responsive to Request No. 16 is compiled from a combination of data supplied in response to various request responses including but not limited to Request No. 1 and Request No. 10. A comprehensive tear down report is provided in **ENCLOSURE 10** and titled **RQ24-001_Q10_0015_CONF BUS INFO.pdf**. Some of the requested information is not available, such as sub parts, m., n., o., and p. for example.

17. Describe the primary differences between the initial Recall 22V-077 and subject recall software remedies:

A17. FCA US' response to this Request is located in **ENCLOSURE 10** and titled **RQ24-001_Q10_0007_CONF BUS INFO.pdf**.

18. Describe the primary differences between the updated Recall 22V-077 and subject recall software remedies:

A18. The updated Recall 22V-077 (24V-536 (73B)) and the subject recall 24V-538 (72B) software remedies are the same, only differing in the model years that they are released for.

19. Describe how the scope of the subject recall was determined to only include subject vehicles built before October 26, 2021.

A19. FCA US' determined scope of the subject recall using cell to battery to vehicle traceability that was determined based from vehicles which had batteries containing cells manufactured prior to the implementation of the vision system used to detect anode tab defects at LGES assembly. All vehicles which have battery cells manufactured prior to the implementation of the vision system at LEGS in September of 2019 are included in 24V-536 (73B) or 24V-538 (72B).

20. Provide the following information related to recalls 25V-741 and 24V-720:

- a. Describe the physical or chemical mechanism that caused the thermal events associated with these recall actions;**
- b. Describe how the software remedy mitigates potential thermal events; and**

c. How does the software remedy associated with these recalls compare to the subject recall software remedy and updated Recall 22V-077 remedy?

A20.

- a. The HV batteries for recall 24V-720 (95B) and 25V-741 (68C) are used in Jeep Wrangler and Grand Cherokee vehicles and are manufactured by Samsung SDI America, Inc., which is a different supplier than the subject recall supplier, and are different design, chemical composition, and manufacturing process than those of the subject recall. As reported in the respective 49 Part 573 Defect Information report ("DIR"), Samsung SDI America, Inc. has stated: "In rare circumstances, a battery pack may contain cells with separator damage. Separator damage, combined with other complex interactions within the cells, may lead to a vehicle fire."
- b. As noted in the DIR, the remedy is revised Battery Pack Control Module ("BPCM") software followed by a HV battery replacement, if diagnostic thresholds are reached. The new CPD3 software introduced in the 25V-741 (68C) campaign enhanced detection capabilities compared to 24V-720 (95B) by using electrical signatures that indicate separator damage, such as abnormal SOC drop, voltage deviation, and self-discharge patterns; conditions strongly correlated with pinhole formation and internal shorts. CPD3 expands monitoring to 95% SOC, covering the full operating range and the critical full-charge and rest periods where most incidents occurred. CPD3 logic continuously monitors individual cell behavior within the pack, comparing cell voltages and SOC trends to detect anomalies in real time. When a defect is detected, the system sets diagnostic trouble code PODAB, now expanded in CPD3 to include new detection logic, with additional monitoring for SOC drop or voltage deviation.
- c. In a similar way, the remedy for 24V-720 (95B) and 25V-741 (68C) is diagnostic software which monitors the health of the HV battery, looking at various measures and metrics. If any of those metrics crosses defined thresholds, a MIL is set, customer is notified with messaging in the cluster, and battery charging is inhibited. However, these batteries and issues are different, as detailed in respective DIR filings. The software remedy implemented in recalls 25V-741 (68C) and 24V-720 (95B) addressed the specified defect in the HV battery built by the supplier Samsung SDI America INC. The software for the subject recall is for HV batteries issued by LGES.

21. 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;
- e. The effectiveness of the subject recall remedy and updated Recall 22V-077 remedy;
- 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 subject component was malfunctioning;
- g. An explanation for the exclusion of the VINs associated with VOQ# 11541798 and VOQ# 11677911 from the subject recall population; and
- h. The other reports included with this inquiry.

A21. FCA US has reviewed the data provided in response to this and prior requests above and the VOQs provided by NHTSA in conjunction with this Information Request. Based on prior investigation, consistent with the review contained herein, FCA US declared a defect for 22V-077 (Z11), 24V-536 (73B) and 24V-538 (72B). FCA US is continually monitoring for field inputs and identified 8 number of cases after the 22V-077 (Z11) remedy was installed and in vehicles not included in that campaign. As a result, FCA US issued the 24V campaigns covering all vehicles up to the production process changes that were implemented to detect bent, folded, or torn anode tabs. For vehicles containing battery cells manufactured after the vision system was implemented, there were three fires that FCA US investigators have concluded originated at the HV battery. Investigation continues into those incidents. One of those three vehicles has been returned to FCA US and LGES for analysis. The current LGES assessment is that the battery coolant heater was the cause of the incident due to damage caused to the battery, however, the FCA US investigation continues. The second vehicle is being shipped back to FCA US for analysis at this time. The third incident vehicle has not been secured as the owner and the owner's attorney have become unresponsive to requests, however, FCA US continues to attempt to secure this vehicle for analysis. At this time these incidents have not been linked to the existing recalls and may be three discrete events. FCA US continues to monitor the field for any potentially related incident. Furthermore, FCA US will take appropriate action if and when additional information from the other two incident packs or other incidents becomes available.

Conclusion

Based on FCA US' review of the data collected and provided in response to this Information Request and in its prior communications with the Agency, and in light of the analysis set forth above, FCA US has concluded that the updated software is providing the enhanced diagnostic detection intended. Field monitoring and continued analysis are ongoing. Should FCA US learn any new information from LGES, field incidents, or pack teardowns that would change the current state, FCA US will react accordingly.