

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”).

FCA US makes the following clarifications to this Information Request:

- On October 9, 2024, FCA US requested an extension for the responses to questions 7, 8, 9, 10, 11, 12, 13, 14, 15, 16 and 17. On October 11, 2024, NHTSA granted this request.
- This submission contains full responses to questions 1, 2, 3, 4, 5, 6 and 8.

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. Indicate if vehicle was subject to recall 22V-865;
 - g. If vehicle was remedied under 22V-865 provide date of remedy repair;
 - 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. FCA US' responses to subparts (a) through (j) of this Request are located in **ENCLOSURE 01** and titled **RQ24-012_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. Property damage claims; and
 - e. Third-party arbitration proceedings, both pending and closed, where FCA is or was a party to the arbitration; and
 - f. Lawsuits, both pending and closed, in which FCA is or was a defendant or codefendant.

For subparts "a" through "f," state the total number of each item (e.g., consumer complaints, field reports, etc.) separately. Multiple incidents involving the same vehicle are to be counted separately. Multiple reports of the same incident are also to be counted separately (i.e., a consumer complaint and a field report involving the same incident in which a crash occurred are to be counted as a crash report, a field report and a consumer complaint).

In addition, for items "c" through "f," provide a summary description of the alleged problem and causal and contributing factors and FCA's assessment of the problem, with a summary of the significant underlying facts and evidence. For items "e" and "f," identify the parties to the action, as

well as the caption, court, docket number, and date on which the complaint or other document initiating the action was filed.

A2. FCA US has conducted a reasonable and diligent search of the normal repositories of information potentially responsive to this Request. Responsive, non-privileged information identified through that search comprises FCA US' responses to subparts (a) through (f) of this Request. That information is located in **ENCLOSURE 02** and titled **RQ24-012_REPORTS.pdf**.

- 3. Separately, for each item (complaint, report, claim, notice, or matter) within the scope of your response to Request No. 2, state the following information:**
- 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 property damage is alleged;**
 - l. Number of alleged injuries, if any; and**
 - m. Number of alleged fatalities, if any**
 - n. Whether any warning lights or messages were present prior to the loss of motive power. List specific lights or messages;**
 - o. Whether the vehicle needed to be towed;**
 - p. Whether property damage is alleged;**
 - q. Number of alleged injuries, if any; and**
 - r. 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 (r) of this Request are located in **ENCLOSURE 03** and titled **RQ24-012_REQUEST NUMBER TWO DATA.accdB**. A list of warning lights or messages present is titled **RQ24-012_WARNING LIGHTS AND MESSAGES.pdf**.

- 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. 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 keyword search using words reasonably related to the reports sought by this IR. The keyword search criteria used in this search are located in **ENCLOSURE 04** and titled **RQ24-012_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 the file titled **RQ24-012_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 **RQ24-012_LEGAL SUMMARIES.pdf**. Field reports are contained in the file titled **RQ24-012_FIELD REPORTS.pdf**. Service History documents are contained in the files titled **RQ24-012_REPAIR ORDERS.pdf** and **RQ24-012_WARRANTY.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. Repair date (MM/DD/YYYY);
- f. Vehicle mileage at time of repair (numeric data type);
- g. Repairing dealer's or facility's name, telephone number, city and state or ZIP code (please use distinct fields for each data type);
- h. Labor operation number(s);
- i. Problem code(s);
- j. Diagnostic trouble code(s);
- k. Replacement part number(s) and description(s);
- l. Concern stated by customer;
- m. Cause as stated on the repair order;
- n. Correction as stated on the repair order; and
- o. Additional comments, if any, by dealer/technician relating to claim and/or repair.

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

A5. FCA US' response to this Request is located in **ENCLOSURE 05** and titled **RQ24-012_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 its response to Request No. 5, FCA US searched the normal repositories of information potentially responsive to this Request utilizing a part number and key word search. The same key words used in Request No. 2 were used in this Request and are found in ENCLOSURE 4. An eyes on review of the claims to determine responsiveness to the alleged defect was then performed. The part numbers used for this search can be found in **ENCLOSURE 06** and titled **RQ24-012_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. FCA US will submit their response to **Request 7** with the November 1, 2024 submission.

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)
- Corrosion Warranty - Anti-Corrosion Perforation Limited Warranty
 - All Panels (3 years/Unlimited miles)
 - Outer Panels (5 years/Unlimited miles)
- Powertrain Limited Warranty (5 years/60,000 miles)
- Federal Emission Warranty (2 years/24,000 miles)
 - Specific Components (8 years/80,000 miles)
- Limited Emissions Warranty – Jeep Wrangler 4xe (8 years/100,000 miles)
- High Voltage Battery Limited Warranty (8 years/100,000 miles)

- Emission Performance Warranty (2 years/24,000 miles)
 - Specific 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 **RQ24-012_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 will submit their response to **Request 9** with the November 1, 2024 submission.

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:**

Action title or identifier;

- a. **The actual or planned start date;**
- b. **The actual or expected end date;**
- c. **Brief summary of the subject and objective of the action;**
- d. **Engineering group(s)/supplier(s) responsible for designing and for conducting the action; and**
- e. **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 will submit their response to **Request 10** with the November 1, 2024 submission.

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 will submit their response to **Request 11** with the November 1, 2024 submission.

- 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 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.

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. FCA US will submit their response to **Request 12** with the November 1, 2024 submission.

- 13. Provide a detailed chronology and supporting documents/analysis leading to the decision to issue recall 22V-865, to include root cause investigation.**

A13. FCA US will submit their response to **Request 13** with the November 1, 2024 submission.

- 14. Provide an explanation of how FCA determined the affected population of recall 22V- 865.**

A14. FCA US will submit their response to **Request 14** with the November 1, 2024 submission.

- 15. Provide information concerning the remedy repairs for recall 22V-865.**
- a. The rationale for the software changes;
 - b. The desired outcome of the changes;
 - c. Do the software versions implemented in the recall remedy differ from the software installed at time of manufacture on vehicles built after the original scope of recall 22V-865?

A15. FCA US will submit their response to **Request 15** with the November 1, 2024 submission.

- 16. Provide the calibration software revision history for the PIM and TCM from start of production through current. Include the rationale for each revision.**

A16. FCA US will submit their response to **Request 16** with the November 1, 2024 submission.

17. Furnish FCA 's assessment of the alleged defect in the subject vehicles, including:

- a. The causal or contributory factor(s);
- b. The failure mechanism(s);
- c. The failure mode(s);
- d. The risk to motor vehicle safety that it poses;
- 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.

A17. FCA US will submit their assessment to **Request 17** with the November 1, 2024 submission.