Question 15 RQ25001

15. Furnish Phoenix's assessment of the alleged defect in the subject vehicles, including:

a. The causal or contributory factor(s), including Phoenix's assessment of Proterra's recall remedy for 22V887;

b. The failure mechanism(s);

c. The failure mode(s);

d. The risk to motor vehicle safety that it poses;

e. The additional risks associated with vehicles (that have or have not received the recall remedy) that are parked and not in use for a long period of time;

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. What benefit the recall remedy software may provide if liquid accumulates in the battery pack enclosure while the bus is not in use; and

h. The reports included with this inquiry.

Phoenix Response

Phoenix's overall assessment of the alleged defect, causal factors, risk assessment, and recall remedy effectiveness are strictly limited by the fact that Phoenix did not design, manufacture, test, or install the subject battery modules/packs. Phoenix does not possess the engineering background or failure analysis skills to independently make a technical determination on causal factors, failure mechanisms, failure modes, and/or the specific risks to motor vehicle safety relating to the subject defect. The information Phoenix possesses, including the recall data, was inherited during the asset purchase from Proterra, and the definitive responsibility for assessing the alleged defect, including the recall remedy, and providing technical analysis remains with Proterra, the manufacturer, or its successor entity.