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OFFICE OF
DEFECTS INVESTIGATION
December 3, 2003

DAIMLERCHRYSLER

DaimlerChrysler Corporation
Stephan J. Speth
Director
Vehicle Compliance & Safety Affairs

Mr. Kenneth N. Weinstein
Associate Administrator, Safety Assurance
National Highway Traffic Safety Administration
400 Seventh Street, S.W.
Washington, D.C. 20590

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Dear Mr. Weinstein:

Attached is DaimlerChrysler Corporation's Non-Compliance Information Report, complying with the requirements of 49 CFR Part 573, Defect and Non-Compliance Reports, which contains details of a safety related non-compliance in a small number of 2000-2001 model year Dodge Ram pickup truck vehicles. The affected vehicles were built with tires that are rated at a capacity slightly lower than is defined on the vehicle certification label and that may not be appropriate for the application of an aftermarket snowplow.

DaimlerChrysler Corporation will conduct a voluntary safety recall to install new tires on these vehicles.

Sincerely,



Stephan J. Speth

Enclosures: Non-compliance Information Report for DaimlerChrysler Corporation Recall
#C40

cc: H. M. Thompson, NHTSA
Division of Occupational Safety & Health
California Department of Industrial Relations

NON-COMPLIANCE INFORMATION REPORT FOR DAIMLERCHRYSLER RECALL

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Submission date: December 3, 2003

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Identifying classification of vehicles potentially affected:

Make	Model	Model Year	Inclusive Dates of Manufacture	Volume	Other
Dodge	Ram 1500 4X4 Pickup Truck	2000-2001	July 1999 thru July 2001	214	Snow plow prep package

Estimated percentage containing noncompliance: 100%**Description of noncompliance:**

The tires supplied on some vehicles may have gross axle weight ratings that slightly exceed the maximum tire load capacity as defined in FMVSS 120, tire selection and rims for vehicles other than passenger cars when equipped with approved brands of snow plows.

The following chronology of principal events occurred between March 2003 and November 2003 and led to the determination of a noncompliance:

- During the NHTSA Tire Reserve Pressure Special Order submission in late March 2003 it was discovered that certain truck vehicles may have certification labels with gross axle weight ratings (GAWR) that slightly exceed the maximum tire load capacity.
- In April – May 2003 the suspect vehicle population was identified and the owner information database was queried so that a survey could be initiated to determine whether the vehicles had incorrect information listed on the vehicle certification labels.
- In May 2003 the information extracted from the owner information database was reviewed in detail to establish the location and quantity of vehicles that may be eligible for the survey. Due to the very small population and age of eligible vehicles, there were no vehicles owned by the company or in the proximity of the company that could be inspected. As a result, current owners had to be identified, contacted, and arrangements made for travel to the vehicle location so that an inspection could be performed.
- In May – September 2003 a survey of vehicles from the suspect vehicle population verified that a small number of vehicles had incorrect information listed on the vehicle certification labels. Further analysis of these vehicles indicated that light duty standard

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cab truck models with the snow plow prep package were incorrectly equipped with P225/75R16XL tires, while the label specified P245/75R16 as the minimum tire size.

- DaimlerChrysler offered this package in 2000 - 2001 to create a snow plow package on a light duty truck to match the competition. Most snow plow prep packages are typically specified for heavy duty trucks only.
- A majority of the light duty standard cab truck models were equipped with the P225/75R16XL tires, however these vehicles were not equipped with the snow plow prep package. The certification label on these vehicles correctly specified a P225/75R16XL as the minimum tire size.
- It was established that the P225/75R16XL tires installed as factory equipment on the affected vehicles do not meet the load capacity requirement as specified by FMVSS 120 to support the GAWR listed on the vehicle certification label. In addition, these tires have the capacity for a total snow plow and permanent hardware weight of 490 pounds, which is 35 pounds less than the amount permitted by DaimlerChrysler. It was further noted that per FMVSS 120, the load carrying capacity of passenger car tires installed on a truck has been de-rated by a factor of 1.1.
- P245/75R16 tires have a load capacity as specified by FMVSS 120 that supports the affected vehicle GAWR listed on the vehicle certification label and will allow a total snow plow and permanent hardware weight of 525 pounds. This weight matches the amount permitted for this vehicle by DaimlerChrysler.
- In October 2003 a detailed analysis of field input was completed and indicated that DaimlerChrysler has not received any complaints from this population of vehicles relating to tire overloading, and there have been no reported incidences of accidents or injuries related to this condition. During this time, additional inspections were held to insure that there were no vehicles outside of the suspect vehicle population that were equipped with incorrect tires.
- This data was presented to the Vehicle Regulations Committee on November 24, 2003 who decided to conduct a safety recall to repair affected vehicles.

Statement of measures to be taken to correct noncompliance:

DaimlerChrysler Corporation will conduct a safety recall to provide replacement P245/75R16 tires for the affected vehicles to meet the load carrying capacity specified on the vehicle certification label and accommodate the addition of a commercially available snow plow and hardware. The existing original equipment wheels are compatible with the

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P245/75R16 tires. DaimlerChrysler expects to initiate national notification to both dealers and owners in January, 2004.

DaimlerChrysler Corporation has a longstanding policy and practice of reimbursing owners who have incurred the cost of repairing a problem that subsequently becomes the subject of a field action. To ensure consistency, DaimlerChrysler Corporation, as part of the owner letter, will request that customers send original receipt and/or other adequate proof of payment to the company for confirmation of the expense.