

**DAIMLERCHRYSLER**

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DEFECTS INVESTIGATION

December 9, 2003

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 recall regarding a non-compliance in some 2000 – 2002 model year Dodge Caravans, Grand Caravans, and Dakota Pickup Trucks. The vehicle certification label on these vehicles does not meet some of the requirements of FMVSS 120, tire selection and rims for vehicles other than passenger cars.

In all cases the issue is inconsequential to vehicle safety since the gross axle weight rating requirement as specified in FMVSS 120 could not be exceeded without exceeding the gross vehicle weight rating for the vehicle. Nonetheless, DaimlerChrysler Corporation will conduct a voluntary safety recall to provide vehicle certification label overlays for the affected vehicles containing corrected information.

Sincerely,



Stephan J. Speth

Enclosure: Non-Compliance Information Report for DaimlerChrysler Corporation Recall #C41

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

# NON-COMPLIANCE INFORMATION REPORT FOR DAIMLERCHRYSLER RECALL

#C41

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Submission date: December 3, 2003

## Identifying classification of vehicles potentially affected:

Make	Model	Model Year	Inclusive Dates of Manufacture	Vehicle Volume
Dodge	Caravan SE/ Grand Caravan SE	2000	July 1999-July 2000	9,257
Dodge	Dakota 4X2	2001-2002	July 2000-July 2002	26,435

Estimated percentage containing non-compliance: 100%

## Description of non-compliance:

The vehicle certification label 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.

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

- During the NHTSA Tire Reserve Pressure Special Order submission in late March 2003 it was discovered that certain vehicles may have certification labels with gross axle weight ratings (GAWR) that slightly exceed the maximum tire load capacity.
- FMVSS 120 specifies in S5.1.2 that "The sum of the maximum load ratings of the tires fitted to an axle shall not be less than the gross axle weight rating (GAWR) of the axle system as specified on the vehicle's certification label required by 49 CFR part 567".
- 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 quantity and location of vehicles that may be eligible for the survey. Due to the limited 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.

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- In May – September 2003 a survey of vehicles from the suspect vehicle populations verified that the vehicles had incorrect information listed on the vehicle certification labels.
- It was established that the 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. 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.
- Most vehicles as equipped from the factory have higher tire load capacities than the minimum size tires that may be listed on the vehicle certification label.
- In October 2003 further investigation determined that in all cases the issue is inconsequential to vehicle safety since the GAWR could not be exceeded without exceeding the gross vehicle weight rating (GVWR) on the vehicle. Since the suspect vehicle population was from two to four model years old, the historical vehicle data had to be assembled so that a manual weight report could be calculated for each case.
- 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 populations that were equipped with non-compliant vehicle certification labels.
- This data was presented to the Vehicle Regulations Committee on November 24, 2003 who decided to send corrected tire certification label information to owners of the affected vehicles.

**Statement of measures to be taken to correct non-compliance:**

DaimlerChrysler Corporation will conduct a safety recall to provide vehicle certification label overlays for the affected vehicles containing corrected information relative to vehicle GAWR and tire size. DaimlerChrysler expects to initiate national notification to both dealers and owners when a sufficient quantity of labels becomes available. DaimlerChrysler's scheduling information for implementing this recall is not available at this time.

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

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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.