

DAIMLERCHRYSLER

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DEFECTS
SECTION

February 3, 2004

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

04V-047 ① of ③

Dear Mr. Weinstein:

Attached is DaimlerChrysler Corporation's Defect Information Report, complying with the requirements of 49 CFR Part 573, Defect and Noncompliance Reports, which contains details of a potential safety related defect in some 2005 model year Dodge Caravan, Dodge Grand Caravan, and Chrysler Town & Country vehicles. A very small number of passenger seatbelt retractors may have been improperly assembled. During a severe frontal impact there is a remote possibility that the belt performance may be affected.

DaimlerChrysler Corporation will conduct a voluntary safety recall to inspect the seat belt retractor and replace the retractor if necessary.

Sincerely,



Stephan J. Speth

Enclosures: Defect Information Report for DaimlerChrysler Corporation Recall # D04

cc: K. C. DeMeter, NHTSA
Division of Occupational Safety & Health
California Department of Industrial Relations

DEFECT INFORMATION REPORT FOR DAIMLERCHRYSLER RECALL # D04

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Submission date: February 3, 2004

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Identifying classification of vehicles potentially affected:

Make	Model	Model Year	Inclusive Dates of Manufacture	Vehicle Volume	Other
Dodge	Caravan, Grand Caravan	2005	10/20/2003 – 01/16/2004	3200 (est)	Without available "Stow 'n Go" seating option
Chrysler	Town & Country				

Estimated percentage containing defect: Less than 0.5%**Description of defect:**

The right front seat belt retractor assembly may have been improperly assembled. As a result, the seat belt may not properly restrain the occupant during certain crash conditions, which can increase the risk of injury.

The name, address and telephone number of the supplier who manufactured the subject components:

Key Safety Systems
7000 Nineteen Mile Rd.
Sterling Heights, MI 48314
(588) 726-3800

The following chronology of principal events occurred between mid January, 2004 and late January, 2004 and led to the determination of a defect:

- On January 12th, 2004, lower than typical front passenger shoulder belt loads were observed during a 2005 model year minivan frontal NCAP test conducted at DaimlerChrysler Corporation.
- Following the NCAP test, the front passenger retractor was returned to the seat belt supplier, Key Safety Systems, for review. Key's analysis established that a critical

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staking operation had been missed during their assembly process. This staking operation insures the position of the digressive load-limiter (DLL) and torsion bar sub-assemblies within the retractor. Without this positional assurance, the DLL on the NCAP test part had shifted, resulting in reduced seat belt torso restraint.

- On January 16th, 2004, DaimlerChrysler Corporation assembly plants were directed to stop shipment and inspect all contained vehicles for presence of the stake on front passenger retractors. During the inspection a small percentage of seat belt retractors were identified as missing the subject stake. All vehicles identified with suspect seat belts were retrofit prior to shipment.
- Investigation revealed that the DLL feature, new for the 2005 model year minivan front passenger retractor, could preclude existing assembly mistake proofing controls at Key from preventing assembly if the staking operation was missed.
- Mistake proofing controls were modified to assure presence of the stake. It was also verified that existing mistake proofing controls at Key would identify and result in a no-build situation for the retractor assemblies used at the other seating positions if the subject staking operation was missed.
- Six non-staked seat belt assemblies returned from the assembly plant inspection were subjected to a severe seatbelt integrity sled test. Results of the testing showed that, while a remote possibility, front passenger seat belt performance during a severe frontal impact may be compromised.
- This data was presented to the Vehicle Regulations Committee who on January 27th, 2004 decided to conduct a safety recall to inspect and repair affected vehicles.

Statement of measures to be taken to correct defect:

DaimlerChrysler Corporation will inspect the retractor assemblies on the affected vehicles for the presence of the stake. Any seat belt assembly that does not have the stake will be replaced. DaimlerChrysler expects to initiate national notification to both dealers and owners in March, 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.