

DAIMLERCHRYSLER

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OFFICE OF DEFECTS
INVESTIGATION

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

February 7, 2006

Mr. Daniel Smith
Associate Administrator of Enforcement, Office of Vehicle Safety
National Highway Traffic Safety Administration
400 Seventh Street, S.W.
Washington, D.C. 20590

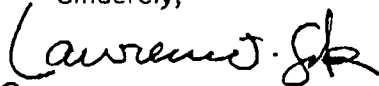
06V-037
(3 pages)

Dear Mr. Smith:

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 2006 model year Jeep Commander vehicles. The integrated retractor bracket edge on the third row seat may contact the seat belt during certain operating conditions and belt performance may be affected.

DaimlerChrysler Corporation will conduct a safety recall to add a cover to the retractor bracket.

Sincerely,


for Stephan J. Speth

Enclosure: Defect Information Report for DaimlerChrysler Corporation Recall F04

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

DEFECT INFORMATION REPORT FOR DAIMLERCHRYSLER RECALL F04

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Submission date: February 7, 2006

Identifying classification of vehicles potentially affected:

Make	Model	Model Year	Inclusive Dates of Manufacture	Vehicle Volume
Jeep	Commander	2006	07/01/05 - 10/06/05	24,058 (estimated)

Estimated percentage containing defect: 100%

Description of defect:

The integrated retractor bracket edge on the third row seat may contact the seat belt during certain operating conditions. As a result, the seat belt may not properly restrain the third row 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:

Johnson Controls, Inc.
49200 Haylard Drive
Plymouth, Michigan 48170
(734) 254-5000

The following chronology of principal events occurred between September of 2005 and January of 2006 and led to the determination of a defect:

- In September of 2005, during in-vehicle homologation testing of the Jeep Commander third row seat belt assembly, contact was noted between the edge of the retractor mounting bracket and the seat belt webbing.
- During this testing, which specified crossed rear seat belts, the webbing caught on the metal edge of the bracket. This seat frame integrated retractor bracket is only utilized in the third row seating configuration of the Jeep Commander.
- No issues with webbing to bracket contact had been noted on any previous durability or impact testing, but as a precautionary measure, the seat belt brackets were covered with a nylon coating beginning on October 6, 2005, while investigation continued.

DEFECT INFORMATION REPORT FOR DAIMLERCHRYSLER RECALL F04

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- Review of a Jeep Commander that had just completed durability simulation on a full vehicle shaker with 50th % male test dummies in the rear seating positions showed rear seat belt wear at the interface to the retractor bracket.
- Investigation revealed that the road profile used for this testing was a vehicle structure simulation of 150% of the typical proving grounds durability schedule, which represents 150,000 customer equivalent miles with a 50th % male occupants in the third row seating positions.
- Because of the severe nature of this durability simulation testing, a detailed review of all other available Jeep Commander testing data was undertaken between late October of 2005 and early January of 2006. This data showed that no vehicles running proving grounds durability testing with third row occupants demonstrated seat belt degradation from contact with the bracket, nor were any seat belt performance issues observed in any of the vehicle crash tests run with test dummies in the third row seats.
- DaimlerChrysler Corporation is unaware of any accidents or injuries attributed to this condition.
- This data was presented to the Vehicle Regulations Committee on January 31, 2006 who decided to conduct a safety recall to repair the affected vehicles.

Statement of measures to be taken to correct defect:

DaimlerChrysler Corporation will inspect the third row seat belts for damage and replace any damaged belts. In addition, an injection molded cover will be added to the retractor bracket on both third row seating positions to prevent the possibility of future damage from belt contact with the retractor bracket. Due to the potential for this condition to occur in the third row seating positions only, the need for unique and severe operating input to induce the condition and the lack of any field input to date, DaimlerChrysler Corporation has concluded that the three day dealer notification rule does not apply. DaimlerChrysler Corporation expects to initiate national notification to both dealers and to owners in February of 2006.

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.