## DAIMLERCHRYSLER

DaimlerChrysler Corporation

Stephan J. Speth

Director

Vehicle Compliance & Safety Attairs

June 6, 2006

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

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Dear Mr. Smith:

Attached is DaimlerChrysler Corporation's (DCC'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 2003 - 2004 model year Jeep Grand Cherokee vehicles equipped with heated seats. The front seat electric heater elements may overheat and could potentially cause a fire under certain operating conditions. DCC will conduct a voluntary safety recall to replace the heated seat elements.

for Stephan J. Speth

Enclosure: Defect Information Report for DaimlerChrysler Corporation Recall F17

K.C. DeMeter, NHTSA cc:

> Division of Occupational Safety & Health California Department of Industrial Relations

## DEFECT INFORMATION REPORT FOR DAIMLERCHRYSLER CORPORATION RECALL F17

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Submission date: June 6, 2006

### Identifying classification of vehicles potentially affected:

Make	Model	Model Years	Inclusive Dates of Manufacture	Volume	Other
Jeep	Grand Cherokee	2003 - 2004	09/10/02 - 06/30/04	111,687 (estimated)	with heated seats

#### Estimated percentage containing defect: unknown

#### Description of defect:

The front seat electric heater element may overheat and could potentially cause a fire under certain operating conditions.

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

- In January of 2005, a report was received of a 2004 model year Grand Cherokee (WJ) vehicle with heated seats that showed evidence of localized overheating of the front passenger seat heater element.
- A small number of similar reports for 2003 and 2004 model year WJ vehicles were received during the spring of 2005. No additional reports were received until the onset of colder weather in late 2005.
- Investigation and analysis in late 2005 and into 2006 determined that in September of 2002, the 2003 model year WJ vehicles began using carbon fiber seat heat elements in place of resistive wire heating elements. The WJ vehicles also utilize a latching hi-lo-off toggle switch which is manually cycled to the off position.
- Thermal imaging of WJ vehicles determined the unoccupied heated seat cover surface temperatures on some vehicles exceeded design intent. Additional testing determined that the heated seat module was operating at a temperature above design intent.
- Investigation also determined that a carbon fiber seat heating element exposed to higher temperature for prolonged periods of time could lead to adhesive degradation and migration. This migration could result in a compromised connection between the carbon fiber and contact leads, which could cause a loss of heated seat operation or potentially lead to a fire.

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- Subsequent testing determined that prolonged operation via the latching switch could lead to an overheating of the seat cover and the potential ignition of materials left on the unoccupied seat.
- Review of vehicles that allegedly exhibited an overheat condition in the unoccupied
  passenger seat determined that the heated seat switch was inadvertently latched to the on
  position. A switch inadvertently placed in this position allows continuous heating of the seat
  element while the vehicle is in operation.
- Investigation determined also determined that for the 2005 model year, the Grand Cherokee vehicle was completely redesigned. The 2005 model year vehicle uses a different heated seat module and resultant temperature as well as a non-latching toggle switch. A review of field data found no relevant input for the 2005 model year Grand Cherokee vehicle.
- DCC is aware of 32 field reports alleging fire in 2003 and 2004 model year WJ vehicles due to a heated seat element overheating.
- This data was presented to the Vehicle Regulations Committee on May 30, 2006 who decided to conduct a voluntary safety recall to replace the heated seat elements to repair the affected vehicles.

### Statement of measures to be taken to correct defect:

DCC will replace the heated seat elements in all affected vehicles with new elements that feed back temperature to the existing control module to regulate the temperature. Due to the need for certain conditions to occur to induce the overheat condition, and since heated seat usage significantly decreases during warmer weather, DCC has concluded that the three day dealer notification rule does not apply. DCC expects to initiate national notification to both dealers and to owners beginning in July of 2006.

DCC has a long-standing 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, DCC, 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.