DAIMLERCHRYSLER

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OFFICE OF DEFECTS INVESTIGATION DaimlerChrysler Corporation Stephan J. Speth

Director Vehicle Compliance & Safety Affairs

September 6, 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-353 (16 pages)

Dear Mr. Smith:

Attached is DaimlerChrysler Corporation's Noncompliance Information Report, complying with the requirements of 49 CFR Part 573, Defect and Noncompliance Reports, which contains details of a potential noncompliance in some 2006 model year Dodge Ram 1500 light duty pick up trucks. If certain model rear facing infant child seats are installed in the right front passenger seating position with the passenger seat in a full forward adjustment position and the passenger airbag deploys, the vehicle may not meet the requirements of FMVSS 208 – Occupant Crash Protection during certain crash conditions.

DaimlerChrysler Corporation has issued a safety recall to replace the passenger airbag cushion and reprogram the airbag control module.

Sincerely,

Stephan Speth

Enclosures: Noncompliance Information Report for DaimlerChrysler Corporation Recall F40 Dealer and Owner Notification letters for DaimlerChrysler Corporation Recall F40

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

NONCOMPLIANCE INFORMATION REPORT FOR DAIMLERCHRYSLER CORPORATION RECALL F40

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Submission date: September 6, 2006

Identifying classification of vehicles potentially affected:

Make	Model	Model Year	Inclusive Dates of Manufacture	Vehicle Volume
Dodge	Ram 1500	2006	09/20/05 - 06/30/06	144,750

Estimated percentage containing noncompliance: 100%

The involved Vehicle Identification Number range is:

Low	<u>High</u>
6J100890	6J248799
6S511224	6S718574

(VIN last eight characters) – 6 = 2006 model year; J = St. Louis North Assembly Plant, St. Louis, Missouri; S = Warren Truck Assembly Plant, Warren, Michigan; and last six digits = sequential number.

DaimlerChrysler Corporation cautions that the above range represents only the lowest and highest VIN sequential numbers included in the recall. This range cannot be used to determine conclusively that a vehicle is involved in the recall because most vehicles with a VIN within the range are not affected by the recall.

Description of noncompliance:

If certain model rear facing infant child seats are installed in the right front passenger seating position with the passenger seat in a full forward adjustment position and the passenger airbag deploys, the vehicle may not meet the requirements of FMVSS 208 – Occupant Crash Protection during certain crash conditions.

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

Takata 2500 Takata Drive Auburn Hills, MI 48326 (248) 373-8040

NONCOMPLIANCE INFORMATION REPORT FOR DAIMLERCHRYSLER CORPORATION RECALL F40

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The following chronology of principal events occurred between March and August of 2006 and led to the determination of a noncompliance:

- On October 3, 2005 DaimlerChrysler Corporation (DCC) made a mid-model year change to the 2006 MY Dodge Ram 1500 light duty pick up truck passenger air bag system to be compliant with the advanced airbag FMVSS 208 low risk deployment option for infants using the Takata New Concept Passenger Module 1 (NCPM1).
- A significant development and certification program for the NCPM1 in the Dodge Ram was completed prior to this launch, including no less than 10 tests using the Century Encore child seat that all demonstrated compliance to the regulation with a reasonable margin. It should be noted that the Century Encore child seat has been out of production since 2002.
- Subsequent NHTSA testing on March 27, 2006 at MGA Research Corporation in Burlington, WI indicated a potential noncompliance when the Century Encore child seat was tested. A HIC injury measure of 400 observed exceeded the allowable limit of 390 during a static airbag deployment with the passenger seat in the full forward adjustment position.
- On May 10, 2006 DCC responded to an Information Request from the Office of Vehicle Safety Compliance (OVSC) regarding the March 27, 2006 testing at MGA. It was determined that the March 27, 2006 test set up was in error and a re-test was agreed to by the OVSC.
- On June 22, 2006 a series of three NHTSA re-tests at MGA Research Corporation in Burlington, WI showed additional results that exceeded the allowable limit for HIC. These tests utilized the same vehicle and Century Encore child seat during a static passenger airbag deployment with the passenger seat in the full forward adjustment position.
- Following the June 22, 2006 re-tests, DCC and the air bag supplier Takata embarked on a substantial investigation program of testing and analysis to attempt to understand the differences between the test results at MGA and previously completed development and certification test results.
- This investigation ultimately determined that significant variability in the NCPM1 air bag module performance existed throughout the 2006 MY production. It was also confirmed that this test configuration is very sensitive to subtle differences in test set up and equipment.
- While this investigation continued, the initial 2007 MY Dodge Ram 1500 light duty pick up truck production was launched in early July of 2006 compliant to the FMVSS 208 sunset clause using remaining DCC credits.
- On July 31, 2006, the NCPM phase 2 (NCPM2) passenger airbag with active venting was implemented in the 2007 MY Dodge Ram 1500 light duty pick up truck. Testing has shown that this system is compliant with the advanced airbag FMVSS 208 low risk deployment option for infants with a greater margin to compliance requirements than the NCPM1 air bag and also has significantly less variability in performance.
- This issue was reviewed with the NHTSA OVSC during a technical meeting on August 10, 2006 in Washington, D.C.
- DCC is unaware of any accidents or injuries attributable to this condition.

NONCOMPLIANCE INFORMATION REPORT FOR DAIMLERCHRYSLER CORPORATION RECALL F40

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• This data was presented to the Vehicle Regulations Committee on August 29, 2006 who decided to conduct a safety recall to replace the passenger airbag cushion and reprogram the airbag control module.

Statement of measures to be taken to correct defect:

DCC will replace the passenger airbag cushion and reprogram the Occupant Restraint Controller on all affected vehicles. DCC has implemented national notification to dealers on September 6, 2006 and expects to begin notification to owners in October of 2006.

DCC 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, 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.

September 2006

Dealer Service Instructions for:

Safety Recall F40 Passenger Airbag Cushion

Models

2006 (DR) Dodge Ram Pick up Truck (1500 Series)

NOTE: This recall applies only to the above vehicles built with Advanced Multistage Front Airbags (sales code CG3).

IMPORTANT: Some of the involved vehicles may be in dealer new vehicle inventory. Federal law requires you to complete this recall service on these vehicles before retail delivery. Dealers should also consider this requirement to apply to used vehicle inventory and should perform this recall on vehicles in for service. Involved vehicles can be determined by using the VIP inquiry process.

Subject

The passenger airbag on about 144,000 of the above vehicles may deploy with excessive force when certain model rear facing child seats are installed in the right front passenger seat position. This can increase the risk of injury to a child seat occupant during certain crash conditions. As a result, these vehicles fail to conform to Federal Motor Vehicle Safety Standard (FMVSS) 208 - Occupant Crash Protection.

Repair

The passenger airbag cushion must be replaced and the Occupant Restraint Controller (ORC) must be reprogrammed (flashed).

NOTE: The owner notification for this recall will be delayed until an adequate quantity of parts is available.

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Parts Information

NOTE: Initially, the airbag cushion listed below will be in very limited supply. Your patience is requested as we expedite an adequate supply of parts for this recall. Due to the limited supply of parts, dealers are initially asked to only order airbag cushions for vehicles with a prospective buyer for installation prior to delivery.

<u>Part Number</u>	Description
CAM0F400	Cushion, Airbag

Special Tools

The following special tools are required to perform this repair:

≻ CH9401*	StarSCAN Tool
➤ CH9404*	StarSCAN Vehicle Cable
➤ CH9409*	StarSCAN Documentation Kit
➤ CH9410*	StarSCAN Ethernet Cable 12 ft.
≻ CH9412*	StarSCAN Software Update Device Kit
> NPN	TechCONNECT PC
> NPN	StarSCAN Software Update CD

* Part of CH9400 kit.

Service Procedure

1. Disconnect and isolate the negative battery cable. Wait two minutes for the system capacitor to discharge before further service.

WARNING: To avoid personal injury or death, on vehicles equipped with airbags, disable the supplemental restraint system before replacing the passenger airbag cushion. Disconnect and isolate the battery negative (ground) cable, then wait two minutes for the system capacitor to discharge. This is the only sure way to disable the supplemental restraint system. Failure to take the proper precautions could result in accidental airbag deployment.

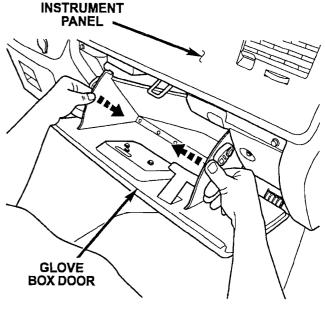
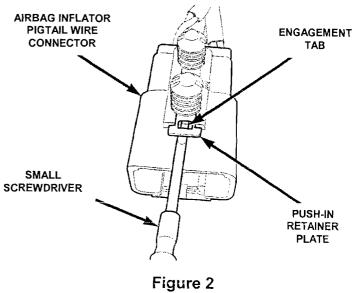


Figure 1

- 2. Using a plastic trim stick, remove the windshield trim bezel from the instrument panel.
- 3. Remove the glove box assembly from the instrument panel by squeezing the sides inward and rolling the door downward (Figure 1).
- 4. Disengage the airbag inflator pigtail wire connector from the plastic push-in retainer plate on the right side of the instrument panel airbag support bracket by:
 - a. Using a small screwdriver, carefully pry the leading edge of the push-in retainer plate away from the connector insulator far enough to clear the engagement tab on the insulator (Figure 2).
 - b. Pull the connector toward you to slide it off of the push-in retainer plate.



- 5. Disconnect the instrument panel wire harness connector from the yellow airbag inflator pigtail wire connector on the right side of the instrument panel airbag support bracket (Figure 3). To disconnect the connector:
 - a. Slide the red Connector Position Assurance (CPA) lock on the top of the connector toward the side of the connector.
 - b. Depress the connector latch tab and pull the two halves of the connector straight away from each other.

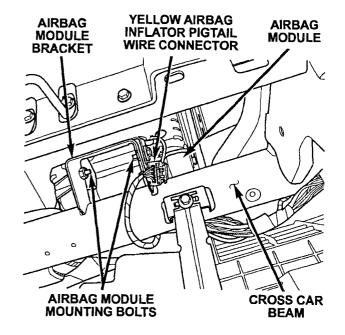


Figure 3 – View Looking into Glove Box Opening

- 6. Remove the two airbag module mounting bolts that secure the passenger airbag lower bracket to the instrument panel airbag support bracket (Figure 3).
- 7. Using a plastic trim stick, gently pry on the outboard edges of the passenger airbag door/cover to disengage the snap features from the receptacles in the instrument panel (Figure 4).
- 8. Remove the passenger airbag assembly from the instrument panel.

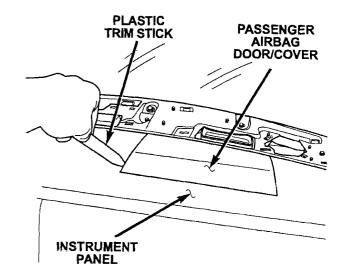
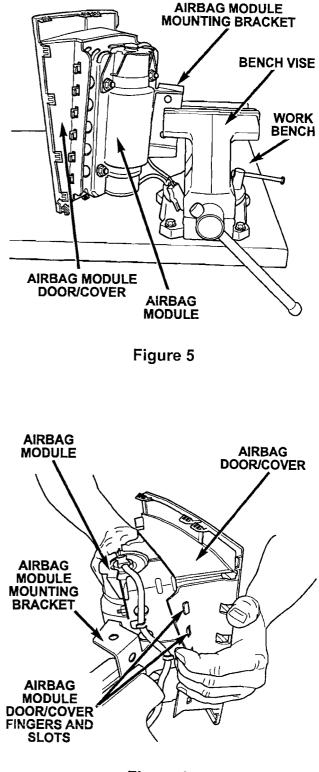


Figure 4

9. Mount the airbag assembly in a bench vise as shown in Figure 5.



10. Remove the airbag plastic door/cover by rolling the cover off the retaining fingers (Figure 6).



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AIRBAG MODULE

MOUNTING BRACKET

Service Procedure (Continued)

11. Remove and save the four airbag cushion retaining nuts (Figure 7).

- 12. Remove the inflator bracket (Figure 7).
- Œ Œ โล Ø AIRBAG CUSHION RETAINING NUTS Figure 7 AIRBAG MODULE AND INFLATOR AIRBAG CUSHION

INFLATOR BRACKET

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13. Carefully remove the airbag cushion from the inflator assembly (Figure 8).

Figure 8

14. Install the new airbag cushion into the airbag inflator assembly.

NOTE: The studs on the airbag cushion are offset to prevent incorrect installation.

- 15. Place the airbag inflator bracket into position (Figure 7).
- 16. Install the airbag cushion retaining nuts. Tighten the nuts to 55 in. lbs (6 N·m) in the sequence shown in Figure 9.
- 17. Install the airbag plastic door/cover.
- 18. Install the airbag assembly into the instrument panel opening.

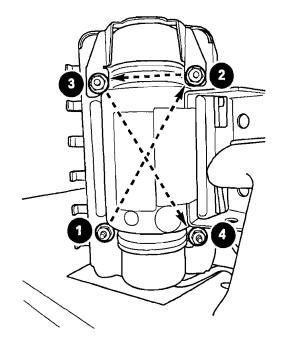


Figure 9

CAUTION: Be certain that the rear edge of the passenger airbag lower bracket is engaged in the hook formation of the instrument panel airbag support bracket or retaining bolt misalignment can occur.

- 19. Install the airbag inflator bracket retaining bolts and tighten to 55 in. lbs. (6 N·m).
- 20. Connect the yellow airbag connector to instrument panel harness and slide the red CPA lock into the locked position.
- 21. Install the glove box assembly.
- 22. Connect the StarSCAN scan tool to the 16-way Data Link Connector (DLC). The DLC is located on the driver side lower edge of the instrument panel, outboard of the steering column.

NOTE: Be certain that the diagnostic scan tool contains the latest version of the proper diagnostic software.

23. Turn the ignition switch to the "ON" position and exit the vehicle with the scan tool.

- 24. Check to be certain that no one is in the vehicle, then reconnect the negative battery cable.
- 25. Install a battery charger and verify that the charging rate provides approximately 13.5 volts.
- 26. Power up the StarSCAN tool.
- 27. Connect the StarSCAN to the internet.
- 28. From the "HOME" screen select "Flash Download".
- 29. Select "Download Files from DealerCONNECT" and press the "Next" button.
- 30. Select "**OK**".
- 31. Enter logon data requested by the StarSCAN and press the "OK" button.
- 32. Select "**Read Information from Connected Vehicle**" and then press the "**Next**" button.
- 33. Press the "Finish" button for search results.
- 34. Select "ORC" file and press "Download to Scan Tool" button.
- 35. Press the "Close" button after the download is complete.
- 36. Press the "Show Shortcuts" button.
- 37. Press the "Home" button.
- 38. Select "ECU View" button.
- 39. Select "ORC" from the list.
- 40. Select "More Options" button.
- 41. Select "ECU Flash" button.

- 42. Select the "ORC" flash file.
- 43. Select "**Update Controller**" button and follow the screen prompts to reprogram the ORC module.
- 44. After the reprogramming is complete, press the "Show Shortcuts" button.
- 45. Press the "Home" button.
- 46. From the "Home" screen select "System View".
- 47. Select "All DTC's" button.
- 48. Select "Clear All Stored DTC's" button and follow the screen prompts to clear codes.
- 49. After all codes are cleared, turn the ignition key to the "**Off**" position and disconnect the StarSCAN from the vehicle.
- 50. Turn off and disconnect the battery charger.

Completion Reporting and Reimbursement

Claims for vehicles that have been serviced must be submitted on the DealerCONNECT Claim Entry Screen located on the Service tab. Claims submitted will be used by DaimlerChrysler to record recall service completions and provide dealer payments.

Use the following labor operation number and time allowance:

	Labor Operation Time	
	<u>Number</u>	<u>Allowance</u>
Replace the passenger airbag		
cushion and reprogram the ORC Module	08-F4-01-82	0.5 hours

Add the cost of the recall parts package plus applicable dealer allowance to your claim.

NOTE: See the Warranty Administration Manual, Recall Claim Processing Section, for complete recall claim processing instructions.

Dealer Notification

All dealers will receive three copies of this dealer recall notification letter by mail. To view this notification on DealerCONNECT, select "Global Recall System" on the Service tab, then click on the description of this notification.

Owner Notification and Service Scheduling

All involved vehicle owners known to DaimlerChrysler are being notified of the service requirement by first class mail. They are requested to schedule appointments for this service with their dealers. A generic copy of the owner letter is attached.

Enclosed with each owner letter is an Owner Notification postcard to allow owners to update our records if applicable.

Dealers are encouraged to consider alternative scheduling and servicing approaches for this recall. This repair does not require hoists or other full service facility special equipment and is a DaimlerChrysler Mobile Service approved repair.

Vehicle Lists, Global Recall System, VIP and Dealer Follow Up

All involved vehicles have been entered into the DealerCONNECT Global Recall System (GRS) and Vehicle Information Plus (VIP) for dealer inquiry as needed.

GRS provides involved dealers with an <u>updated</u> VIN list of <u>their incomplete</u> vehicles. The owner's name, address and phone number are listed if known. Completed vehicles are removed from GRS within several days of repair claim submission.

To use this system, click on the "Service" tab and then click on "Global Recall System." Your dealer's VIN list for each recall displayed can be sorted by: those vehicles that were unsold at recall launch, those with a phone number, city, zip code, or VIN sequence.

Dealers <u>must</u> perform this repair on all unsold vehicles <u>before</u> retail delivery. Dealers should also use the VIN list to follow up with all owners to schedule appointments for this repair.

Recall VIN lists may contain confidential, restricted owner name and address information that was obtained from the Department of Motor Vehicles of various states. Use of this information is permitted for this recall only and is strictly prohibited from all other use.

Additional Information

If you have any questions or need assistance in completing this action, please contact your Service and Parts District Manager.

Customer Services Field Operations DaimlerChrysler Corporation

SAFETY RECALL F40 – PASSENGER AIRBAG CUSHION

Dear: (Name)

This notice is sent to you in accordance with the requirements of the National Traffic and Motor Vehicle Safety Act.

DaimlerChrysler Corporation has decided that some 2006 model year Dodge Ram 1500 Series Pick Up trucks fail to conform to Federal Motor Vehicle Safety Standard (FMVSS) No. 208 – Occupant Crash Protection.

The problem is	The passenger airbag on your truck (VIN: xxxxxxxxxxxxxxx) may deploy with excessive force when certain model rear facing child seats are installed in the right front passenger seat position. This can increase the risk of injury to a child seat occupant during certain crash conditions.	
What your dealer will do	DaimlerChrysler will repair your vehicle free of charge (parts and labor). To do this, your dealer will replace the passenger airbag cushion and reprogram the Occupant Restraint Controller. The work will take about ½ hour to complete. However, additional time may be necessary depending on how dealer appointments are scheduled and processed.	
What you must do to ensure your safety	Simply contact your dealer right away to schedule a service appointment. Ask the dealer to hold the parts for your vehicle or to order them before your appointment. Remember to bring this letter with you to your dealer.	
If you need help	If you have questions or concerns which your dealer is unable to resolve, please contact DaimlerChrysler at 1-800-853-1403.	

Please help us update our records, by filling out the attached prepaid postcard, if any of the conditions listed on the card apply to you or your vehicle.

If you have already experienced this condition and have paid to have it repaired, you may send your original receipts and/or other adequate proof of payment to the following address for reimbursement: DaimlerChrysler P.O. Box 4639 Oak Ridge, TN 37831, Attention: Reimbursement.

If your dealer fails or is unable to remedy this noncompliance without charge and within a reasonable time, you may submit a written complaint to the Administrator, National Highway Traffic Safety Administration, 400 Seventh Street, S.W., Washington, DC 20590, or call the toll-free Vehicle Safety Hotline at 1-888-327-4236 (TTY 1-800-424-9153), or go to http://www.safercar.gov.

We're sorry for any inconvenience, but we are sincerely concerned about your safety. Thank you for your attention to this important matter.

Backle aft for Safety

Customer Services Field Operations DaimlerChrysler Corporation Notification Code F40

Note to lessors receiving this recall: Federal regulation requires that you forward this recall notice to the lessee within 10 days.