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2007 MAY -3 A 8:30

DEFECTS INVESTIGATION
RECALL MGMT DIV.

DaimlerChrysler Corporation

Stephan J. Speth

Director

Vehicle Compliance & Safety Affairs

May 1, 2007

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

07V-192
(5 pages)

Dear Mr. Smith:

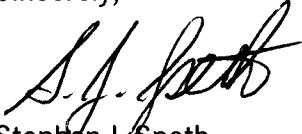
To resolve a pending investigation by the Office of Defects Investigation (ODI), DaimlerChrysler Corporation (DCC) has agreed to conduct a regional Customer Satisfaction Notification (CSN) to replace supplemental up front airbag sensors (UFSs) containing brass bushings on some 2005 MY Dodge Caravan, Dodge Grand Caravan and Chrysler Town & Country minivans. These vehicles were originally sold or are currently registered in the 20 salt belt state and District of Columbia region as previously defined by ODI, plus Kentucky, North Dakota, South Dakota, Utah, Nebraska, Kansas and Alaska. With respect to the minivans equipped with UFSs containing brass bushings that are not covered by the CSN, DCC will offer lifetime free replacement of any UFS that fails. This action by DCC does not constitute a determination of a safety-related defect, and DCC has not made such a determination. DCC understands that, in response to the above commitments, ODI will close investigation EA06-003.

Per agreement between our respective staffs, DCC will provide NHTSA with quarterly completion reports on the CSN containing the information required by 49 CFR 573.7 for six quarters following its launch.

To put this issue in context, DCC points to the following facts. UFSs were added to DCC's MY 2005 minivans to enhance their performance in deformable barrier tests, but are not needed to achieve compliance with regulatory requirements. The single-point sensor in these vehicles, which is present and operational even if both UFSs are inoperative, provides an adequate level of safety, and a malfunction of one or both of the UFSs will not adversely affect safety. Moreover, should a UFS become inoperative, the driver is immediately alerted via illumination of the airbag warning light that the vehicle should be serviced promptly.

Notwithstanding the above, DCC desires to resolve the pending ODI investigation. As agreed with your staff, to do so, DCC will conduct the actions described above. A report containing relevant information is attached.

Sincerely,

A handwritten signature in black ink, appearing to read 'S. J. Speth', written in a cursive style.

Stephan J. Speth

Enclosure: Information Report for DaimlerChrysler Corporation Actions G09/X16

cc: K.C. DeMeter, ODI

Submission date: May 1, 2007

Identification of vehicles potentially affected:

Customer Satisfaction Notification G09:

Make	Model	Model Year	Inclusive Dates of Manufacture	Volume	Other Info
Dodge	Caravan, Grand Caravan	2005	04/24/03 through 02/02/05	270,958 (estimated)	With brass bushing UFSs only, originally sold in or currently registered in 20 salt belt states plus DC, KY, ND, SD, UT, NE, KS and AK
Chrysler	Town & Country				

Extended Warranty X16:

Make	Model	Model Year	Inclusive Dates of Manufacture	Volume	Other Info
Dodge	Caravan, Grand Caravan	2005	04/24/03 through 02/02/05	133,128 (estimated)	With brass bushing UFSs only, not originally sold in or currently registered in 20 salt belt states plus DC, KY, ND, SD, UT, NE, KS and AK
Chrysler	Town & Country				

Estimated percentage containing issue: TBD

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

Robert Bosch Corporation
38000 Hill Tech Drive
Farmington Hills, MI 48331
248-876-1000

Description of Condition:

DCC has determined that the supplemental front airbag sensors may crack under certain conditions and allow water to enter into the sensor. This can cause the sensor to become inoperative and illuminate the airbag warning light. These sensors were added to enhance the performance of the airbag system in certain frontal crashes.

Background and chronology:

- On November 18, 2005, ODI opened investigation PE05-061 to investigate allegations of inoperative supplemental upfront airbag sensors (UFSs) on some 2005 MY Dodge and Chrysler (RS) minivans. The investigation was upgraded to EA06-003 on April 19, 2006 and was expanded to include 2006 MY RS minivans.
- The UFSs utilized at the launch of the 2005 MY RS minivans in January 2004 contained brass bushings and were molded of BASF Ultradur material. In response to a relatively high rate of warranty replacements during the first five months following the beginning of production, DCC made changes to the UFS molding process as well as to the attachment system. Although the overall UFS warranty rate decreased, it remained higher than expected in locations where road salt was used in harsh winter climates.
- In January of 2005, DCC implemented a design change to replace the brass bushings in the UFSs with steel bushings to minimize the possibility of failures due to corrosion.
- In April of 2006, additional modifications were made. These included a new mold design and deeper steel bushings, and the housing material was changed from Ultradur to DuPont Crastin material.
- DCC's investigation of these issues revealed that UFSs with brass bushings could crack and leak after environmental testing that included water, salt, and freeze/thaw temperature cycling. These test results correlated with the warranty field experience. However, DCC believed at that time, and continues to believe, that the failure of the UFSs in the subject minivans does not create a safety problem, and therefore the existence of such failures does not constitute a safety-related defect.
- The steel bushing/Ultradur and the steel bushing/Crastin UFS performed acceptably in all test configurations, and have a much lower rate of warranty replacements than the UFSs with brass bushings.
- There are no confirmed reports of accidents or injuries related to any failure of a UFS in the subject minivans.

- This information was presented to the Vehicle Regulations Committee (VRC) on April 24, 2007. The VRC decided that DCC would conduct a Customer Satisfaction Notification to replace brass bushing UFSs on 2005 MY RS minivans that were sold or are currently registered in the 20 salt belt state and District of Columbia region as previously defined by ODI, plus Kentucky, North Dakota, South Dakota, Utah, Nebraska, Kansas and Alaska. With respect to the minivans equipped with UFSs containing brass bushings that are not covered by the CSN, DCC will also offer lifetime free replacement of any UFS containing a brass bushing that fails.

Statement of measures to be taken:

DCC will replace supplemental up front airbag sensors (UFSs) containing brass bushings on 2005 MY Dodge Caravan, Dodge Grand Caravan and Chrysler Town & Country minivans that were originally sold or are currently registered in the 20 salt belt states as previously defined by the Office of Defects Investigation (ODI), plus the District of Columbia, Kentucky, North Dakota, South Dakota, Utah, Nebraska, Kansas and Alaska. With respect to the minivans equipped with UFSs containing brass bushings that are not covered by the CSN, DCC will offer lifetime free replacement of any UFS that fails. DCC expects to begin national notification to both dealers and to owners in July of 2007.

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.

These actions by DCC do not constitute the determination of a safety-related defect, and DCC has not made such a determination.