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10V-008
(3 Pages)

Mr. Daniel C. Smith
Associate Administrator for Enforcement
National Highway Traffic Safety Administration
1200 New Jersey Avenue, SE
West Building, Fourth Floor
Washington, D.C. 20590

Dear Mr. Smith:

To resolve a pending investigation by the Office of Defects Investigation (ODI), Chrysler Group LLC (Chrysler) has agreed to conduct a regional Customer Satisfaction Notification (CSN) to replace supplemental up front crash sensors (UFSs) with Ultradur plastic housings and steel bushings on some 2005 and 2006 MY Dodge Caravan, Dodge Grand Caravan and Chrysler Town & Country minivans. These vehicles were originally sold or are currently registered in the NHTSA defined salt belt (20 states plus District of Columbia) in addition to Kentucky, North Dakota, South Dakota, Utah, Nebraska, Kansas and Alaska. This action by Chrysler does not constitute a determination of a safety-related defect, and Chrysler has not made such a determination. Chrysler understands that, in response to the above commitments, ODI will close investigation RQ09-003.

Per agreement between our respective staffs, Chrysler 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, Chrysler points to the following facts. UFSs were added to Chrysler's MY 2005 minivans to enhance their performance in deformable barrier tests, but are not needed to achieve compliance with regulatory requirements. The primary crash 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 promptly serviced.

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

Sincerely,

David D. Dillon

Enclosure: Information Report for Chrysler CSN J38

cc: K.C. DeMeter, NHTSA

- The UFSs molded with Ultradur material and brass bushings which were in production for the 2005 MY subject minivans thru early February 2005. This version of UFS was subject to cracking, leaking, corroding and becoming inoperative in the Salt Belt.
- UFSs are auxiliary crash detection sensors that provide input to the occupant restraint controller (ORC). The ORC houses the primary crash sensor which remains functional without UFS input (but an airbag warning light will illuminate).
- On March 29, 2007 NHSTA agreed to close EA06-003 (upgraded from PE05-061), contingent on the proposed field actions, without the determination that a safety defect existed in the UFSs molded with Ultradur material and brass bushings.
- At the time of G09 / X16 launch, the subsequent UFS version which had been in production until April 2006 and was molded with Ultradur and steel bushings, exhibited relatively lower warranty rates and demonstrated significantly better results in environmental testing.
- In April 2006, Chrysler introduced a third version of UFS into production which superceded the previous version. These UFSs, which were of a redesigned shape and molded with DuPont Crastin material and steel bushings, were also used as a remedy for Chrysler actions G09 and X16.
- Since the opening of RQ09-003, investigation revealed that:
 - The warranty rates in the Salt Belt for UFSs molded with Ultradur material and steel bushings had climbed such that the projected fallout would reach 29% in 15 years.
 - The warranty rates in the non-salt belt and for UFSs molded with Crastin material and steel bushings in all regions are low.
- 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 December 22, 2009. The VRC decided that Chrysler would conduct a Customer Satisfaction Notification to replace the UFSs molded with Ultradur material and steel bushing on 2005 and 2006 MY RS minivans that were sold or are currently registered in NHTSA defined salt belt (20 states plus District of Columbia) in addition to Kentucky, North Dakota, South Dakota, Utah, Nebraska, Kansas and Alaska.

Statement of measures to be taken:

Chrysler will replace supplemental up front airbag sensors (UFSs), molded of Ultradur material and containing steel bushings, with UFSs molded of Crastin material and containing steel bushings, on 2005 and 2006 MY Dodge Caravan, Dodge Grand Caravan and Chrysler Town & Country minivans that were originally sold or are currently registered in the NHTSA defined salt belt (20 states plus District of Columbia) in addition to Kentucky, North Dakota, South Dakota, Utah, Nebraska, Kansas and Alaska. Chrysler expects to begin national notification to both dealers and to owners in February 2010.

Chrysler 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, Chrysler, 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 Chrysler do not constitute the determination of a safety-related defect, and Chrysler has not made such a determination.

Submission date: January 7, 2010

Identification of vehicles potentially affected:

Make	Model	Model Year	Inclusive Dates of Manufacture	Volume	Other Info
Dodge	Caravan, Grand Caravan	2005 2006	01/19/05 through 04/05/06	259,437 (estimated)	UFSs molded with Ultradur material and steel bushings, 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: 29% (Estimated over 15 year life)

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:

Chrysler has determined that the supplemental front crash sensors may crack under certain environmental 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.

The following chronology of events led to the Chrysler planned CSN J38:

- In July of 2009 NHTSA opened RQ09-003, a query on the scope of Chrysler Customer Satisfaction Notification (CSN) G09 / extended warranty X16 (NHTSA Campaign ID 07V192000) based on 45 customer complaints of airbag warning lamp illumination as a result of inoperative UFSs.
- G09 was a CSN launched in July 2007 for the replacement of UFSs molded with Ultradur material and brass bushings on 2005 MY subject (EA06-003) minivans in areas of the U.S. subject to road salt and colder climates ("Salt Belt")
- X16 was an extended lifetime warranty launched in July 2007 for the balance of geographic regions for the EA06-003 subject minivans built with UFSs molded with Ultradur material and brass bushings.