



July 19, 2017

Mr. Stephen Ridella
Director, Office of Defects Investigations
National Highway Traffic Safety Administration (NHTSA)
W41-326, West Building
1200 New Jersey Avenue SE
Washington, D.C. 20590

Reference: Takata ACRO, Paragraph 47 and Emails received from Elizabeth Mykytiuk on May 5, 2017 and June 9, 2017

Dear Mr. Ridella,

The purpose of this correspondence is to provide the required notification in reference to the "Other" category as defined within the vehicle reporting guidelines per Paragraph 47 of the Third Amendment to the Coordinated Remedy Order and Elizabeth Mykytiuk's Email instruction dated May 5, 2017 and June 9, 2017 entitled "Paragraph 47 Instructions."

FCA US LLC ("FCA US") intends to utilize the other category as identified in 49 CFR § 573.7(b)(5). FCA US has defined this category based on the criteria found in the Takata ACRO, Paragraph 45, items (a-c) shown below.

- a) ALL vehicles in the particular recall campaign are at least five years of age measured from their production dates; and
- b) a vehicle has not been registered in any state or territory, or has held an expired registration, for at least three continuous years; and
- c) at least one alternative, nationally recognized data source corroborates the vehicle is no longer in service. Examples of such data sources include: records from the National Motor Vehicle Title Information Service (NMVTIS); a license plate recognition data source; and a vehicle history report reflecting a lack of activity for at least three years (e.g., no repair or maintenance history, no transfer of title or purchase records, etc.). In utilizing this provision, a vehicle manufacturer shall not ignore information in its possession that indicates that the vehicle remains in service.



FCA US will comply with the requirements found in the Takata ACRO, Paragraph 48, items (a-d) shown below.

- a) keep records to substantiate the determination to count any vehicle in the “other” category; and
- b) in the initial notice, and with updates upon NHTSA’s request, provide written documentation identifying to NHTSA an estimate of the financial resources saved utilizing this approach and explaining how those resources are reallocated to improve recall completion rates for the recalled vehicle population that remains in service; and
- c) perform retroactive monitoring to identify any VIN reported as “other” but that was later serviced, for any reason, by a dealer. This recurring obligation shall be completed every quarter for which the vehicle manufacturer reports on the recall. Should the number of these VINs exceed five (5) percent of the total number of “other” reported VINs, the vehicle manufacturer must notify NHTSA and justify why the “other” category should remain available for use for that recall; and
- d) maintain ALL VINs as active, or “live”, in the VIN data systems such that any search for the VIN will reflect an open recall status on the NHTSA web tool, the manufacturer’s web tool, and any and all dealer and other data.

In response to the Takata ACRO, Paragraph 48(b), FCA US paid an independent third party to perform an advanced data enhancement activity. The cost of the activity greatly exceeded any cost savings resulting from the removal of VINs from the recall population, so FCA US did not save financial resources utilizing this approach. Further, FCA US pays the independent third party to perform multi-touch outreach on a per-VIN basis. While removing VINs through this activity reduced the amount FCA US must pay for multi-touch outreach, the actual total number of VINs removed was roughly half of the projected total number of VINs expected to be removed based on pilot data enhancement trials. Because of this, and ignoring the large initial investment for this activity, the multi-touch outreach savings that FCA US will realize is less than half of what it expected and the cost of multi-touch outreach will increase by more than the amount saved. All savings that FCA US realized by utilizing this approach will be reallocated to multi-touch outreach for the VINs that were projected to be removed from the recalls, but were not.

FCA US will amend the Defect Information Reports (“DIR”) for the following campaigns:

15V-312	16V-077	16V-947
15V-313	16V-081	
15V-354	16V-352	
15V-444	16V-379	



FIAT CHRYSLER AUTOMOBILES

FCA US will wait for your response before amending the noted DIRs.

Please contact Chris Freeman, of my staff, should there be any questions regarding this report.

Sincerely,

A handwritten signature in black ink, appearing to read 'Thomas McCarthy', written over a horizontal line.

Thomas McCarthy

Head of Vehicle Safety Compliance and Product Analysis

.cc

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