



U.S. Department
of Transportation
**National Highway
Traffic Safety
Administration**

1200 New Jersey Avenue SE.
Washington, DC 20590

JUL 29 2009

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Chris Fudala
Vice President of Engineering
Valley Towing Products
32501 Dequindre Road
Madison Heights, MI 48071

NVS-215/jtt
EQ09-006
09E-044

**Re: Distribution of Recalled Tow Assemblies Involved in
Safety Recall 09E-044**

Dear Mr. Fudala:

On July 7, 2009, Chrysler Group LLC (Chrysler) notified the National Highway Traffic Safety Administration (NHTSA) that certain Mopar aftermarket tow bar assemblies for use with model year 2007 and 2008 Jeep Wranglers can fail under certain driving conditions. This can result in the towed vehicle separating from the towing vehicle, possibly resulting in a crash. Chrysler further stated that Valley Towing Products was its supplier for the defective tow bar assemblies. NHTSA assigned recall number 09E-044 to this recall. A copy of Chrysler's Part 573 report is enclosed.

The Office of Defects Investigation, Recall Management Division (RMD) is investigating this safety recall and has assigned this investigation the number EQ09-006. The purpose of this letter is to determine whether the same tow bar assemblies as are involved in safety recall 09E-044, or assemblies substantially similar to those involved in that recall, and that might contain the same safety-related defect, were distributed to other companies. To the extent your company may have sold or distributed any such assemblies, it is also to request submission of a Part 573 report as to those assemblies pursuant to 49 CFR 573.3. (unless the company believes and provides supporting information to validate that the assemblies are not defective). Please provide answers to the following questions listed below. Please restate each question prior to providing the answer.

★★★★★
NHTSA
www.nhtsa.gov

1. Please state whether Valley Towing Products sold or shipped the same tow bar assemblies as are involved in safety recall 09E-044, or assemblies substantially similar to those involved in that recall, and that might contain the same safety-related defect, to anyone other than Chrysler. If your answer is "no," then please disregard the remaining questions. No further action other than supplying your answer is needed.

If your answer is "yes," then please state the total number of those assemblies and the beginning date and ending date of their manufacture. Identify design changes, supplier changes or other factors that indicate the beginning and ending period of production. Please provide the number of any of these assemblies that may still be within the control of Valley Towing Products.

2. Explain the nature of the defect and how Valley Towing Products believes it relates to motor vehicle safety. If Valley Towing Products does not believe this defect relates to motor vehicle safety, please so state and explain any reasoning, methodology, testing, or analysis that led to this conclusion.

3. List all Valley Towing Products customers that purchased or otherwise received the same or substantially similar assemblies, and provide their name, address, phone number, contact person, and state the quantity sold to each, the date(s) of sale, and whether that customer is a manufacturer of new motor vehicles.

4. To the extent any of the customers you identified in response to question 3 are not vehicle manufacturers, please advise us whether or not Valley Towing Products intends to notify those customers of the defect in accordance with 49 U.S.C. § 30118(c)(1) and 30119(d)(2).

Please provide the requested information no later than August 28, 2009.

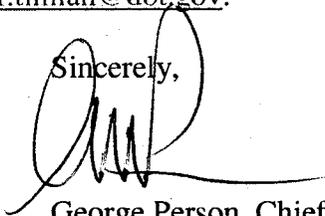
This letter is issued pursuant to 49 U.S.C. § 30166 which authorizes the NHTSA to request any information that it deems necessary in administering and enforcing the Motor Vehicle Safety Act of 1969, as amended, 49 U.S.C. 30101, et seq. Failure to respond promptly, truthfully, and completely to this letter and the inquiries made herein could subject Valley Towing Products to significant civil penalties and/or a claim for injunctive relief.

If Valley Towing Products claims that any of the information or documents provided in response to this information request constitute confidential commercial material within the meaning of 5 U.S.C. § 552(b)(4), or are protected from disclosure pursuant to 18 U.S.C. § 1905, the company must submit supporting information together with the materials that are the subject of the confidentiality request, to the Office of Chief

Counsel, National Highway Traffic Safety Administration, 1200 New Jersey Ave., SE, Washington, D.C. 20590. Please see 49 CFR Part 512 for further instructions as to what is required to properly file a request for confidential treatment.

Please note conspicuously on your response the inquiry number EQ09-006 related to this matter. Should you have any questions or concerns, please contact Ms. Jennifer Timian on (202) 366-0209 or by email at jennifer.timian@dot.gov.

Sincerely,

A handwritten signature in black ink, appearing to read 'G. Person', written over the word 'Sincerely,'.

George Person, Chief
Recall Management Division

Enclosure



July 8, 2009

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:

Attached is Chrysler Group LLC's ("Chrysler") 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 Mopar aftermarket tow bar assemblies. These assemblies were sold during the 2007 and 2008 calendar year for use as aftermarket equipment on 2007-2008 model year Jeep Wranglers. The tow bar kit, sold as a Mopar accessory to tow a Jeep Wrangler behind a tow vehicle, can fail under certain driving conditions. This can result in the Wrangler being towed to separate from the tow vehicle, only being retained by the safety cables.

Although only approximately 308 suspect aftermarket tow bar assemblies were sold, Chrysler will notify by mail all owners of 2007-2008 model year Jeep Wranglers who could have purchased a tow bar assembly. Owners who purchased a tow bar assembly will be requested to take their vehicle to a Chrysler dealer for replacement of the tow bar assembly.

Sincerely,

A handwritten signature in cursive script, appearing to read "David Bernier".

David Bernier

Enclosure: Defect Information Report for Chrysler Recall J24

cc: K.C. DeMeter, NHTSA

DEFECT INFORMATION REPORT FOR CHRYSLER GROUP LLC RECALL J24

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Submission Date: July 8, 2009

Identification of equipment potentially affected:

Approximately 308 subject tow bar assemblies were sold as Mopar aftermarket equipment. These assemblies can be identified by Chrysler part number 82209758.

Estimated percentage containing defect: 100%

Description of defect:

The tow bar kit can fail under certain driving conditions. This can result in the Jeep Wrangler being towed to separate from the tow vehicle, only being retained by the safety cables.

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

Valley Towing Products (formerly Thule Towing Systems LLC)
32501 Dequindre Road
Madison Heights, MI 48071
(248) 588-6900

The following chronology of principal events led to the determination of a defect:

- In the fall of 2007, a complaint was received that a Jeep Wrangler separated from the tow vehicle while using the Mopar tow bar kit. As a precautionary measure, a sales restriction was placed on the tow bar kits while an investigation began.
- Review of the customer complaint revealed an apparent detachment at one of the tow bar horizontal pin connections between the frame mounting bracket and the crossbar.
- Vehicle testing confirmed that during turn maneuvers, side-loading between the frame mounting brackets and the crossbar can result in deformation and/or shearing of the clip which retains the horizontal pin.
- A detached clip can result in a horizontal pin falling out; causing the crossbar connection to the vehicle's frame mounting bracket to detach. If a crossbar connection(s) become(s) detached, the towed-vehicle is only retained by the safety cables, potentially resulting in damage to both the Jeep Wrangler and the tow vehicle.
- To correct the issue, the crossbar was re-designed to engage to the frame mounting brackets via a 2-sided, clevis design that eliminates side-loading of the horizontal pin clips.
- Chrysler Group LLC is aware of seven customer complaints that appear related to this issue. There are no known injuries or fatalities, but three of the complaints reference property damage.
- This data was presented to the Chrysler Vehicle Regulations Committee on June 30, 2009 who decided to conduct an equipment safety recall.

DEFECT INFORMATION REPORT FOR CHRYSLER GROUP LLC RECALL J24

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Statement of measures to be taken to correct defect:

The owners of all 2007-2008 model year Jeep Wranglers vehicles who could have purchased a tow bar assembly will be contacted by mail. Owners who purchased a tow bar assembly will be requested to take their vehicle to a Chrysler dealer for replacement of the tow bar assembly. Chrysler expects to initiate national notification to both dealers and owners in late August of 2009.

Chrysler 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, 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 expense confirmation.