

DAIMLERCHRYSLER

January 24, 2005

Ms. Kathleen C. DeMeter, Director
Office of Defects Investigation
National Highway Traffic Safety Administration
400 Seventh Street, S.W.
Washington, D.C. 20590

DaimlerChrysler Corporation
Stephan J. Speth
Director
Vehicle Compliance & Safety Affairs

Dear Ms. DeMeter:

Reference: NVS-213gm; EA04-011

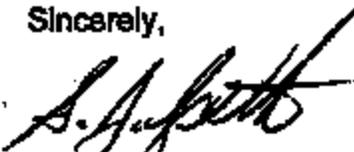
This document completes DaimlerChrysler Corporation's ("DCC's") response to the referenced inquiry dated November 18, 2004 regarding information concerning parking brake assembly experience on 1998 through 2003 Dodge Ram 1500 pickup truck vehicles.

DCC's review of complaints, warranty claims, field reports, and parts demand has not identified any issue with the parking brake assembly performance characteristics for the subject peer vehicles. The absence of these issues can be attributed to the design philosophy and adherence to stringent design standards, combined with comprehensive vehicle testing programs whereby vehicles undergo hundreds of thousands of miles of durability testing in a variety of environmental conditions prior to vehicle volume production. DCC has received only a very small number of complaints relating to parking brake function resulting from an issue at the wheel end of the parking brake assembly. This very small number of complaints comes from a population of over 1.3 million of the subject peer vehicles, and most of those complaints can be attributed to service brake lining wear in vehicles equipped with drum rear brakes.

Additionally, there are no allegations of unintended vehicle movement as a result of parking brake assembly performance issues for the subject peer vehicles for the 2002-2003 model years, which use a drum in hat cable actuated parking brake system.

In summary, DCC's review of this information has identified no indication of any parking brake assembly performance issue with the subject peer vehicles.

Sincerely,



Stephan J. Speth

Attachments and Enclosures

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- Q1. State, by model and model year, the number of subject vehicles DC has manufactured for sale or lease in the United States. Separately, for each subject vehicle manufactured to date by DC, state the following:**
- a. Vehicle identification number (VIN);**
 - b. Model;**
 - c. Transmission type;**
 - d. Two wheel or four wheel drive;**
 - e. Parking brake manufacturer, type, and model name;**
 - f. Date of manufacture;**
 - g. Date warranty coverage commenced; and**
 - h. The state in the United States where the vehicle was originally sold or leased (or delivered for sale or lease).**

Provide this information in five separate files, each file corresponding to one of the subject model years in Microsoft Access 2003, or a compatible format, entitled "EA04-011 RAM 1500 MY 20xx PRODUCTION DATA." See Enclosure 1, EA04-011 Data Collection Disc, for pre-formatted tables that provide further details regarding this submission.

- A1. Enclosure 1 (CD-rom) contains the requested vehicle volume information provided in the Microsoft Access 2000 format. There were 1,346,131 of the subject peer vehicles manufactured for sale or lease in the United States for the 1999-2003 model years. There were 772,636 of the subject peer vehicles manufactured for sale or lease in the United States for the 1999-2001 ("BR/BE" platform) model years, and there were 573,495 of the subject peer vehicles manufactured for sale or lease in the United States for the 2002-2003 ("DR" platform) model years. Although many of the specifications remained the same for the subject peer vehicles, there was a design change made to the parking brake system when the rear drum brake "BR/BE" platform was revised to the rear disc brake "DR" platform in the 2002 model year, which incorporated a drum in hat type cable actuated parking brake system.**
- Q2. State the number of each of the following, received by DC, or of which DC is otherwise aware, which relate to, or may relate to, the subject condition in the subject vehicles:**
- a. Consumer complaints, including those from fleet operators;**
 - b. Field reports, including dealer field reports;**
 - c. Reports involving a crash, injury, or fatality, based on claims against the manufacturer involving a death or injury, notices received by the manufacturer alleging or proving that a death or injury was caused by a possible defect in a subject vehicle, property damage claims, consumer complaints, or field reports;**
 - d. Property damage claims; and**
 - e. Third-party arbitration proceedings where DC is or was a party to the arbitration; and lawsuits, both pending and closed, in which DC is or was a defendant or codefendant.**

For subparts "a" through "e", state the total number of each item (e.g., consumer complaints, field reports, etc.) separately. Multiple incidents involving the same vehicle are to be counted separately. Multiple reports of the same incident are also to be counted separately (i.e., a consumer complaint and a field report involving the same incident in which a crash occurred are to be counted as a crash report, a field report and a consumer complaint).

In addition, for items "c" through "e", provide a summary description of the alleged problem and causal and contributing factors and DC's assessment of the problem, with a summary of the significant underlying facts and evidence. For items d and e, identify the parties to the action, as well as the caption, court, docket number, and date on which the complaint or other document initiating the action was filed.

In accordance with the verbal direction from Greg Magno, NHTSA ODI investigator assigned to this peer inquiry, DaimlerChrysler Corporation ("DCC") is providing all requested input as described in a - e above that alleges a report of parking brake performance concerns reported at the "wheel end" of the brake assembly and which affect the ability of the parking brake to hold the vehicle stationary. Additionally, some reports alleging cable or apply mechanism issues or water/mud intrusion damage which may affect on the parking brake performance are also provided in the spirit of complete cooperation.

DCC's search criteria for relevant reports, in accordance with direction from Greg Magno were as follows:

A word search which referenced any part of the parking brake, park brake, or emergency brake system, or any reports of a vehicle failing to remain stationary while the parking brake is applied. Additionally, a category search was also performed, which provided reports of parking brake system complaints categorized under braking system related reports.

- A2. a) There were 9 responsive reports provided to DCC which are designated as "CAIR" reports (Customer Assistance Information Report). Of those 9 reports provided to DCC, 6 of those reports have been investigated by an independent third-party investigator and are noted by the descriptor "SI-CAIR" (Special Investigation - Customer Assistance Information Report).
- b) There is one field report representing two newly delivered vehicles where the dealer alleged that the parking brake pedal went to the floor at delivery. The rear drums were removed and a brake adjustment was performed, although there was no further substantiation that a parking brake performance issue existed.

- c) There are no reports that allege a crash due to the failure of the parking brake assembly, and there are no injury or fatality incidents that allege parking brake ineffectiveness as the cause for the 1999-2003 DCC Ram 1500 Pickup truck vehicles.
- d) There is one third-party arbitration proceeding where DCC was a party to the arbitration that related to alleged parking brake failure on the subject peer vehicle population. This 47,000 mile automatic transmission "BR/BE" rear drum brake vehicle allegedly exhibited inadvertent vehicle movement while idling with the parking brake engaged, and DCC was not given an opportunity to inspect the vehicle prior to repair.
- e) There are three warranty litigation claims related to alleged parking brake failure for the subject peer vehicles, although none of these claims alleged inadvertent vehicle movement with the parking brake applied. These three claims were associated with "lemon law" issues, and listed the parking brake assembly among other alleged suspect components on the vehicle.

The following chart summarizes the customer complaints, field reports, and claims for the peer vehicle subject model years of the investigation. Although many of the specifications remained the same for the subject peer vehicles, there were one primary design change made when the "BR/BE" platform, which used a rear drum brake service brake assembly and a cable actuated parking brake assembly was revised in the 2002 model year to the "DR" platform, which used a rear disc brake assembly with a drum in hat cable actuated parking brake system.

Subject Peer Vehicle Population: 1,346,131
 1999-2001 Model Year "BR/BE" Vehicles/2002-2003 Model Year "DR" Vehicles

Category Description	CAIR	SI - CAIR	Field Reports	Claims / Lawsuits	Total
Alleged parking brake inability to hold vehicle in stationary position	2/0	5/0	0/0	1/0	8/0
Allegation of improper parking brake assembly function	0/1	0/0	1 ¹ /0	2/0	3/1
Contamination reported which may affect parking brake performance	0/1	0/0	0/0	0/1	0/2
Sub-Total	2/2	5/0	1/0	3/1	14
Total	7/2				

A) 1 field report represents two unique vehicles

There are a total of 14 reports representing 15 unique vehicles that either allege inability of the parking brake system to adequately hold the vehicle in a stationary position, or report an issue with the "wheel end" of the parking brake system which may be responsive to this inquiry. Of these reports, there are no substantiated reports of any parking brake systems which indicate any signs of performance degradation that are not associated with normal wear of the vehicle's brake system. Additionally, all of the reports alleging inability of the parking brake system to effectively hold the vehicle in a stationary position are from "BR/BE" platform vehicles, which use a parking brake system that is incorporated into the rear drum service brake assembly. This type of parking brake system is subject to the same wear that is associated with normal service brake usage. Failure of an owner to properly maintain the rear brake linings could affect parking brake performance. The remaining reports are provided for the "DR" vehicles, which use a cable actuated drum in hat type parking brake system. This extremely low level of input does not indicate any trend or pattern.

- Q3. Separately for each item (complaint, report, claim, notice, or matter) within the scope of your response to Request No. 2, state the following information:**
- a. DaimlerChrysler's file number or other identifier used;**
 - b. The category of the item, as identified in Request No. 2 (i.e., consumer complaint, field report, etc.);**
 - c. Vehicle owner or fleet name (and fleet contact person), address, and telephone number;**
 - d. Vehicle's VIN;**
 - e. Vehicle's make, model and model year;**
 - f. Vehicle's mileage at time of incident;**
 - g. Incident date;**
 - h. Report or claim date;**
 - i. Whether unintended movement of the vehicle occurred while the parking brake was engaged;**
 - j. Whether a crash is alleged;**
 - k. Whether property damage is alleged;**
 - l. Where an item was struck, identify the item;**
 - m. Number of alleged injuries, if any;**
 - n. Number of alleged fatalities, if any;**

Provide this information in Microsoft Access 2003, or a compatible format, entitled "EA04-011 RAM 1500 REQUEST NUMBER TWO DATA." See Enclosure 1, EA04-011 Data Collection Disc, for a pre-formatted table that provides further details regarding this submission.

- A3. Enclosure 3 contains the information detail requested for the incidents described in the answer to question 2 in the Microsoft Access 2000 format.**

- Q4. Produce copies of all documents related to each of items "c" through "e" within the scope of Request No. 2. Organize the documents separately by category (i.e., crash/injury/fatality reports, property damage claims, etc.) and describe the method DC used for organizing the documents.**
- A4. Enclosure 4 contains copies of all documents related to each item within the scope of response 2, categorized as Consumer Complaints, Field Reports, or Claims.**
- Q5. State, by model and model year, a total count for all of the following categories of claims, collectively, that have been paid by DaimlerChrysler to date that relate to, or may relate to, the subject condition in the subject peer vehicles: warranty claims; extended warranty claims; claims for good will services that were provided; field, zone, or similar adjustments and reimbursements; and warranty claims or repairs made in accordance with a procedure specified in a technical service bulletin or customer satisfaction campaign. Separately, for each such claim, state the following information:**
- a. DaimlerChrysler's claim number;**
 - b. Vehicle owner or fleet name (and fleet contact person) and telephone number;**
 - c. VIN;**
 - d. Repair date;**
 - e. Vehicle mileage at time of repair;**
 - f. Repairing dealer's or facility's name, telephone number, city and state or ZIP code;**
 - g. Labor operation number;**
 - h. Problem code;**
 - i. Replacement part number(s) and description(s);**
 - j. Concern stated by customer; and**
 - k. Comment, if any, by dealer/technician relating to claim and/or repair.**

Provide this information in Microsoft Access 2003, or a compatible format, entitled "EA04-011 RAM 1500 WARRANTY DATA." See Enclosure 1, EA04-011 Data Collection Disc, for a pre-formatted table that provides further details regarding this submission.

- A5. In addition to the information provided in Enclosure 5, in the file entitled "WARRANTY DATA", the chart below is a total collective count of claims separated by model year as requested.**

MODEL YEAR	Parking Brake System WARRANTY CLAIMS
1999	1,056
2000	239
2001	671
2002	270
2003	188

Further analysis of the warranty data provided indicates that there is an extremely low rate of warranty claims for a population of over 1.3 million vehicles, and upon further inspection, is primarily associated with repairs not associated with the alleged defect in the subject peer vehicles.

- Q6. Describe in detail the search criteria used by DaimlerChrysler to identify the claims identified in response to Request No. 5, including the labor operations, problem codes, part numbers and any other pertinent parameters used. Provide a list of all labor operations, labor operation descriptions, problem codes, and problem code descriptions applicable to the subject condition in the subject peer vehicles. State, by make and model year, the terms of the new vehicle warranty coverage offered by DaimlerChrysler on the subject peer vehicles (i.e., the number of months and mileage for which coverage is provided and the vehicle systems that are covered).**
- A6. The search criteria used by DCC to identify claims to Request No. 5, can be found in the charts below:**

1999-2001	BR/BE	1 and 6	05100502	-	Adjuster, Brake Shoe-Rear Drum Right
1999-2001	BR/BE	1 and 6	05100503	-	Adjuster, Brake Shoe-Rear Drum Left
1999-2001	BR/BE	1 and 6	05700606	-	Brake Shoe and Lining-Rear Right
1999-2001	BR/BE	1 and 6	05700607	-	Brake Shoe and Lining-Rear Left
1999-2001	BR/BE	1 and 6	05700609	-	Brake Shoe and Lining-Rear Axle Set
1999-2001	BR/BE	1 and 6	05001040	-	Parking Brake Adjust
1999-2001	BR/BE	1 and 6	05001041	-	Parking Brake Adjust-Rear Disc
2002-2003	DR	1 and 6	05001041	-	Parking Brake Adjust-Rear Disc
2002-2003	DR	1 and 6	05700606	-	Brake Shoe and Lining-Rear Right
2002-2003	DR	1 and 6	05700607	-	Brake Shoe and Lining-Rear Left
2002-2003	DR	1 and 6	05700609	-	Brake Shoe and Lining-Rear Axle Set
2002-2003	DR	1 and 6	05700610	-	Brake Shoe and Lining Parking Brake-Axle Set
2002-2003	DR	1 and 6	-	05080568AB	Shoe Kit-Park Brake Axle Set

Problem codes for the above referenced labor operations are provided below:

C1	Chipped	3X	Warped or Out Of Round
SE	Shortage Part	45	Grabs or Pulls
X3	Teeth Damaged or Worn	50	Improper Adjustment
X8	Stripped-Threads	51	Improperly Adjusted
OX	Wrong Part	68	Noisy
07	Binds, Sticks or Seized	79	Parking Brakes Overtightened
09	Brinnelled or Hard Spots	87	Rusted
11	Broken or Cracked	89	Scored or Scratched
2X	Vibration or Chatter		

The warranty provided by DCC for the 1999-2003 model year Ram 1500 pickup truck vehicles is covered under the "Basic Warranty" period, which is 3 years or 36,000 miles. Additionally, DCC dealers often perform repairs at no charge on out-of-warranty vehicles as a goodwill gesture. Customers can also purchase additional extended service contracts at their option.

- Q7.** Produce copies of all service, warranty, and other documents that relate to, or may relate to, the subject condition in the subject peer vehicles, that DaimlerChrysler has issued to any dealers, regional or zone offices, field offices, fleet purchasers, or other entities. This includes, but is not limited to, bulletins, advisories, informational documents, training documents, or other documents or communications, with the exception of standard shop manuals. Also include the latest draft copy of any communication that manufacturer's short name is planning to issue within the next 120 days.
- A7.** There are no service, warranty, and/or other documents that relate to, or may relate to, the alleged defect in the subject peer vehicles, that DCC has issued to any dealers, regional or zone offices, field offices, fleet purchasers, or other entities.
- Q8.** Describe each of the different parking brake systems used on the subject vehicles, whether they are traditional rear drum service brakes that incorporate a cable-actuated parking brake feature or a "drum in hat" rear disc arrangement. For each system identified, provide a schematic, model and manufacturer names, and swept area.
- A8.** Enclosure 8 contains a summary chart and the relevant schematics describing the parking brake systems on the subject peer vehicles. In the 2000 model year, the "BR/BE" platform rear drum brake assembly was redesigned and resourced by DCC. Although

many of the specifications remained the same for the subject peer vehicles, there was an additional design change made when the "BR/BE" platform, which used a rear drum brake service brake assembly and a cable actuated parking brake assembly was revised in the 2002 model year to the "DR" platform, which used a rear disc brake assembly with a drum in hat cable actuated parking brake system.

The total number of unique reports (14) is very low in aggregate for a population of over 1.3 million vehicles, especially considering most of these subject peer vehicles have been in service for at least 4 model years. Additionally, most of these reports are from vehicles with the type of parking brake system that is subject to the same wear that is associated with normal service brake usage. DCC believes that the data provided does not show any trend, and therefore any relationship between any specific brake system or model year.

Q9. Identify the five largest fleets in the United States that utilize the subject vehicles. Separately identify the five largest fleets within the region encompassed by Washington DC, Delaware, Maryland, New Jersey, Pennsylvania, Virginia, Ohio, and West Virginia that utilize the subject vehicles. For each of the fleets identified, state the following:

- a. Fleet name and address;**
- b. Point of contact name and telephone number; and**
- c. Number of subject peer vehicles sold to that fleet by model name.**

A9. Enclosure 9 contains a summary chart of the five largest fleets and the respective numbers of vehicles sold that utilize the subject peer vehicles within the United States, in addition to the region encompassed by Washington DC, Delaware, Maryland, New Jersey, Pennsylvania, Virginia, Ohio, and West Virginia.

The specific fleet name and address, in addition to point of contact name and telephone number is being summarized as requested and will be submitted to Ms. Jacqueline Glassman, Office of the Chief Counsel, under separate cover with a request for confidential treatment of information.

In summary, DCC's review of complaints, warranty claims, and parts demand has not identified any issue with the subject peer vehicle's parking brake assemblies. DCC believes the comprehensive development testing and vehicle durability testing that each new vehicle must complete prior to volume production has greatly contributed to the superior performance of the parking brake system on the subject peer vehicle population.