

# DAIMLERCHRYSLER

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OFFICE OF DEFECTS INVESTIGATION

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

August 19, 2005

Ms. Kathleen DeMeter  
Office of Defects Investigation  
National Highway Traffic Safety Administration  
U.S. Department of Transportation  
400 Seventh Street, SW  
Washington, D.C. 20590

Reference: NVS-214bby; EA05-005

Dear Ms. DeMeter,

This document contains DaimlerChrysler Corporation's (DCC) response to the referenced inquiry dated July 6, 2005 regarding information concerning the speed control deactivation switch (SCDS) in 1995 - 2001 Dodge Ram light duty pickup trucks. In reaching our analysis and conclusions, and by providing the information contained herein, DCC is not waiving its claim to attorney work product and attorney-client privileged communications.

As discussed between members of our respective staffs on multiple occasions, the SCDS utilized by Ford and the subject of investigation EA05-005 is completely different from that utilized by DCC in its design, functionality, packaging, and potential susceptibility to fire. Based on these substantial differences, exception is taken with the classification of DCC product as peer vehicles. Nonetheless, in the spirit of cooperation with the agency, DCC is providing the attached response.

As agreed to during conversation on July 13, 2005 between members of my staff and NHTSA ODI Investigator Bruce York, the scope of this response is limited to 1995-2001 model year light duty Dodge Ram pickup trucks (BR/BE models) manufactured for sale or lease in the United States. Also, as agreed to during conversation on July 15, 2005 between members of my staff and NHTSA ODI Chief Richard Boyd, the subject condition is defined for the scope of this request as "non crash, key-off, passive electrical (non fluid) underhood fires." As also agreed, DCC will include all known reports of non crash, key-off, fires for the subject peer population where the cause could not be determined.

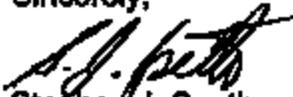
As can be seen in the attached response, DCC's review of complaints, field reports, warranty claims, legal proceedings, and lawsuits has not identified any speed control system integrity or performance characteristics for the greater than 1.75 million DCC vehicles in the subject population. This absence of issues can be

attributed to the design philosophy and adherence to stringent design standards, combined with comprehensive vehicle testing programs whereby DCC vehicles undergo hundreds of thousands of miles of durability testing in a variety of environmental conditions prior to vehicle volume production.

There are no reports of underhood fire attributable to the speed control system. Some of the reports contained within are likely attributable to issues already remedied by safety recalls conducted by DCC on the subject population. For much of the limited amount of remaining input that appeared to meet the definition of the subject condition, i.e., "non crash, key-off, passive electrical underhood fires," it is impossible to determine if the vehicle was indeed in a key-off condition or the exact origin of the fire. Nevertheless, these reports are included. The data also show that the limited amount of remaining input that does exist consists of random and isolated conditions in a subject vehicle population that ranges from four to eleven years in age, with no single universal cause and no evidence of any product defect or compromised vehicle safety.

In summary, DCC's review of this information has found no indication of any speed control system performance concerns or non crash, key-off, passive electrical underhood fire related trends in the subject peer population.

Sincerely,



Stephan J. Speth

Attachment and Enclosures

- Q1. State, by model and model year the number of subject peer vehicles DaimlerChrysler (DCC) has manufactured for sale or lease in the United States. Separately, identify how many of the vehicles were built with and without cruise control.**

**Provide the information for this request in a Microsoft Excel 2000 format (or a compatible format). Entitle the table "Peer Request Number 1 Data".**

- A1. During the 1995 to 2001 model years, DaimlerChrysler Corporation (DCC) manufactured 1,766,872 Dodge Ram light duty pickup trucks (BR/BE models) for the US market. 1,549,256 of these subject vehicles were equipped with cruise control.**

<b>MY / FAMILY</b>	<b>MAKE / MODEL</b>	<b>Built w/ Cruise Control</b>	<b>Built w/o Cruise Control</b>	<b>TOTAL U.S. VOLUME</b>
'95 BR / BE	Dodge Ram 1500	148,862	20,035	168,897
'96 BR / BE	Dodge Ram 1500	227,948	28,611	256,559
'97 BR / BE	Dodge Ram 1500	253,760	19,512	273,272
'98 BR / BE	Dodge Ram 1500	261,880	33,058	294,938
'99 BR / BE	Dodge Ram 1500	233,477	37,973	271,450
'00 BR / BE	Dodge Ram 1500	121,606	19,492	141,098
'01 BR / BE	Dodge Ram 1500	301,723	58,937	360,660

The detailed response that lists the production data is provided in Enclosure 1 as a Microsoft Access 2000 compatible format, titled "DCC Production Information".

- Q2. State, by model and model year, the number of each of the following, received by DaimlerChrysler, or of which DaimlerChrysler is otherwise aware, which relate to, or may relate to, the subject condition in the subject peer 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 the subject condition in a subject peer**

vehicle, property damage claims, consumer complaints, or field reports;

- d. Third-party arbitration proceedings where DaimlerChrysler is or was a party to the arbitration; and,
- e. Lawsuits, both pending and closed, in which DaimlerChrysler 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.) that occurred on vehicles built with cruise control and without cruise control separately. Also, identify how many of the items occurred while the ignition was in the off, on and unknown ignition position and how many of the incidents resulted in damage to a structure. 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).

Provide the information for this request in a Microsoft Excel 2000 format (or a compatible format). Entitle the table "Peer Request Number 2 Data".

- A2. The following summarizes the non-privileged reports received by DCC that relate to, or may relate to, the alleged condition in the subject vehicles. DCC has conducted a reasonable and diligent search of our normal repositories of such information.
  - a. There are a total of 34 customer complaints (26 unique vehicles) distributed over a volume of 1,766,872 subject vehicles and seven model years that allege passive electrical underhood fire with the key off. There are an additional 48 complaints (44 unique vehicles) that allege passive underhood electrical fire, but insufficient information is available to determine if the key was in the on or off position at the time of the incident. There are also six complaints (six unique vehicles) that allege passive electrical fire with the key in the off position that may be of underhood origin, but insufficient information is available to determine the exact location. Nevertheless, these are being included since they *may* relate to the subject condition. It can be seen in the chart below that the input received for these four to eleven year old subject vehicles appears random with no evidence of any trends. In addition, it is DCC's opinion that some of these inputs may have been related to conditions that have already been recalled in the field (see Question 6). DCC has received no customer complaints alleging vehicle fire that were related to the cruise control system.

<b>Criteria</b>	<b>'95</b>	<b>'96</b>	<b>'97</b>	<b>'98</b>	<b>'99</b>	<b>'00</b>	<b>'01</b>	<b>Total Reports</b>	<b>Unique VINs</b>
Key position: Off Origin: Underhood Source: Electrical	1	2	7	8	4	4	7	34	26
Key position: Unknown Origin: Underhood Source: Electrical	7	5	6	7	9	1	13	48	44
Key position: Off Origin: Unknown Source: Electrical	0	0	1	3	2	0	0	6	6
<b>Total Complaint Count</b>	<b>8</b>	<b>7</b>	<b>14</b>	<b>18</b>	<b>15</b>	<b>5</b>	<b>20</b>	<b>88</b>	<b>76</b>

- b. There are 19 field reports with 19 unique VINs that allege passive electrical underhood fire. Two of these field reports have corresponding customer complaints (reported in a. above). From the information provided with these field reports it is impossible to determine if these vehicles were in a key-off condition at the time of the alleged event.
- c. There are no reports involving crash, injury or fatalities for the subject peer vehicles. There are six reports involving property damage. For purposes of this response, property damage is considered to be any damage beyond the vehicle itself. Four of these six reports involved partial damage to an adjacent structure.
- d. There are no third-party arbitration proceedings involving DCC that are responsive to this inquiry.
- e. There are 15 legal claims against DCC, or notices received by DCC, that are responsive to this inquiry. 13 of the legal claims identified have corresponding customer complaints (reported in a. above).

<b>Criteria</b>	<b>'95</b>	<b>'96</b>	<b>'97</b>	<b>'98</b>	<b>'99</b>	<b>'00</b>	<b>'01</b>	<b>Total</b>
Key position: Off Origin: Underhood Source: Electrical	1	1	0	2	2	1	1	8
Key position: Unknown Origin: Underhood Source: Electrical	1	0	1	0	1	0	1	4
Key position: Off Origin: Unknown Source: Electrical	0	0	1	0	2	0	0	3
<b>Total Legal Count</b>	<b>2</b>	<b>1</b>	<b>2</b>	<b>2</b>	<b>5</b>	<b>1</b>	<b>2</b>	<b>15</b>

**Q3. 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, state the total number of claims that occurred on vehicles built with cruise control and without cruise control. Also, identify how many of the claims occurred while the ignition was in the off, on and unknown ignition position and how many of the incidents resulted in damage to a structure.**

**Provide the information for this request in a Microsoft Excel 2000 format (or a compatible format). Entitle the table "Peer Request Number 3 Data".**

<b>LOP</b>	<b>'95</b>	<b>'96</b>	<b>'97</b>	<b>'98</b>	<b>'99</b>	<b>'00</b>	<b>'01</b>
14-20-03-01	789	3902	3818	3546	4730	2264	2171
14-20-03-65	0	1	1	1	2	0	2
14-20-03-60	0	4	5	5	5	1	2
14-20-05-01	84	158	123	82	108	35	74
14-20-05-60	0	0	0	0	0	0	0
14-20-10-01	0	0	0	0	0	0	0
14-20-20-01	124	1164	1343	509	245	114	304
08-45-17-02	0	0	0	0	0	0	0
08-80-84-01	2780	2706	1982	1695	6005	2036	3011
08-80-84-61	0	0	0	0	0	0	0
08-85-30-01	337	0	0	0	00	0	0
28-90-07-01	0	0	0	0	0	0	0

**A3. It is impossible to determine what any particular warranty claim is for. There are other random issues that are not related to this group of subject peer vehicles. DCC has concluded that the warranty cannot be used to determine any trend related to the alleged condition.**

**The detailed response that lists the warranty claim detail is provided in Enclosure 3 as a Microsoft Access 2000 compatible format, titled "Peer Request Number 3 Data".**

- Q4. Describe in detail the search criteria used by DaimlerChrysler to identify the claims identified in response to Request Number 3, 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). Describe any extended warranty coverage option(s) related to the subject condition that DaimlerChrysler offered for the subject peer vehicles and state by option, model, and model year, the number of vehicles that are covered under each such extended warranty.**
- A4. The search criteria used by DCC to determine the claims identified in response to Request Number 3 can be found in the charts below:**

<b>Repair Description</b>	<b>Labor Operation</b>
Servo Assembly, Speed Control	14-20-03-01 / 85 / 80
Cable, Speed Control to Throttle Body	14-20-05-01 / 60
Reservoir, Speed Control Vacuum	14-20-10-01
Hose, Speed Control Vacuum	14-20-20-01
Module, Speed Control	08-45-17-02
Switch, Brake	08-80-84-01 / 81
Switch, Speed Control	08-85-30-01
Wiring Harness, Speed Control	08-90-07-01

<b>Failure Code</b>	<b>Description</b>	<b>Failure Code</b>	<b>Description</b>
SE	Shortage and/or Error	07	Binds, Sticks, or Seized
X9	Vacuum Leak	11	Broken or Cracked
14	Burned or Burned Out	08	Blocked
18	Circuit Open	X2	Split, Cut or Torn
51	Improperly Installed	0X	Wrong Part
83	Connection Loose	27	Damaged
48	Grounded or Shorted	50	Improper Adjustment
68	Noisy	D2	Cross or Early Cancel
3R	High / Low Operating Effort	85	Improperly Installed Wiring
X6	Terminals Damaged	9X	Routed Improperly

The standard warranty provided by DCC for the 1996 to 2001 model year Dodge Ram light duty pickup trucks was 3 years or 36,000 miles.

Additionally, DCC dealers often perform repairs at no charge to the customers on out-of-warranty vehicles as a goodwill gesture. Customers could also purchase additional extended service contracts at their option through third party providers not affiliated with DCC. These service contract data are not available to DCC and is not included with this response.

- Q5. 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.**
- A5. 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.**
- Q6. Provide copies of any Technical Bulletins, Customer Satisfaction Campaigns, or Recall Campaigns related to engine compartment fire on the subject peer vehicles.**
- A6. There are no Technical Service Bulletins or Customer Satisfaction Campaigns related to engine compartment fire for the subject peer vehicles.**

There are five Recall Campaigns that relate to potential engine compartment fire for the 1995 to 2001 model year Dodge Ram light duty pickup trucks (BR/BE modes). Copies of the customer and dealer notification letters are included in Enclosure 4.

**B04 (2001 model year) – The Power Distribution Center generator cable could loosen. NHTSA Campaign ID number 02V042000.**

**836 (1999 model year) – An incorrect underbody hydraulic clutch fluid line heat shield might not properly protect the line. NHTSA Campaign ID number 99V190000.**

**828 (1994-1999 model year 4WD) – The hydraulic clutch fluid line could melt. NHTSA Campaign ID number 99V115000.**

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737 (1997 model year) – The outer dash silencer pad could contact the exhaust pipe. NHTSA Campaign ID number 97V126000.

722 (1994-1997 model year) – The fluid temperature could cause the plastic retainer in the transmission cooler line quick connect fitting to melt. NHTSA Campaign ID number 97V084000.

None of these five Recall Campaigns involved the subject vehicle cruise control system.