



July 12, 2013

Mr. Jeffrey L. Quandt, Chief
Vehicle Controls Division (VCD), NVS-213
U.S. Department of Transportation

National Highway Traffic Safety Administration (NHTSA)
Office of Defects Investigation (ODI)
Room W48-312
1200 New Jersey Avenue SE
Washington, D.C. 20590

Reference: NVS-213krh; PE13-016

Dear Mr. Quandt:

Attached is Chrysler Group LLC's partial response to the referenced inquiry (Question 1- 8). In performing the analysis and reaching conclusions, and by providing the information contained herein, Chrysler Group LLC is not waiving its claim to attorney work product and attorney-client privileged communications. As agreed during the July 3, 2013 discussion, Chrysler Group LLC plans to provide the remainder of its response to this inquiry on August 9, 2013.

Sincerely,


Reginald Modlin

Attachment and Enclosures

Preliminary Statement

On April 30, 2009 Chrysler LLC, the entity that manufactured and sold the vehicles that are the subject of this Information Request, filed a voluntary petition for relief under Chapter 11 of Title 11 of the United States Bankruptcy Code.

On June 10, 2009, Chrysler LLC sold substantially all of its assets to a newly formed company now known as Chrysler Group LLC. Pursuant to the sales transaction, Chrysler Group LLC assumed responsibility for safety recalls pursuant to the 49 U.S.C. Chapter 301 for vehicles that were manufactured and sold by Chrysler LLC prior to the June 10, 2009 asset sale.

On June 11, 2009, Chrysler LLC changed its name to Old Carco LLC. The assets of Old Carco LLC that were not purchased by Chrysler Group LLC, as well as the liabilities of Old Carco that were not assumed, remain under the jurisdiction of the United States Bankruptcy Court – Southern District of New York (*In re Old Carco LLC, et al.*, Case No. 09-50002).

Note: Unless indicated otherwise in the response to a question, this document contains information through May 21, 2013, the date the information request was received.

This attachment contains Chrysler Group LLC's partial response to Questions 1 – 8.

1. **State, by model, engine and model year, the number of MY 2006 Chrysler 300C, Dodge Charger and Magnum vehicles Chrysler has manufactured for sale or lease in the United States and federalized territories. Separately, for each subject vehicle manufactured to date by Chrysler, state the following:**
 - a. **Vehicle identification number (VIN);**
 - b. **Model;**
 - c. **Engine (displacement and engine code)**
 - d. **Model Year;**
 - e. **Date of manufacture; Date warranty coverage commenced; and**
 - f. **The State in the United States (or federalized territory) where the vehicle was originally sold or leased (or delivered for sale or lease).**

Provide the table in Microsoft Access 2003, 2007, or a compatible format, entitled "PE13_016_ PRODUCTION DATA."

- A1. The 2006 model year (MY) Chrysler 300C, Dodge Charger and Dodge Magnum US market vehicles are designated as the LX model and are built in the Brampton Assembly Plant in Brampton, Ontario, Canada. Included in the subject vehicles are all SRT versions of each model (i.e. Chrysler SRT8 is a 300C). The total number of subject vehicles manufactured by Chrysler for sale or lease for the United States and federalized territories was 153,820.

The detailed response that lists the production data is provided in Enclosure 1 – Production Data as Microsoft Access 2010 tables titled "PE13_016_PRODUCTION DATA.mdb".

2. **State, by model and model year, the number of MY 2006 Chrysler 300C, Dodge Charger and Magnum vehicles Chrysler has manufactured for sale or lease in the United States and federalized territories for which Chrysler has sold an extended service plan. For vehicles with more than one extended service plan, list the vehicle separately for each plan. Separately, for each vehicle, state the following:**
 - a. **Vehicle Identification number (VIN);**
 - b. **Model;**
 - c. **Model Year;**
 - d. **Name of extended service plan;**
 - e. **Mileage at which the extended service plan expires; and**
 - f. **Number of months from the warranty start date at which the extended service plan expires.**

Provide this information in Microsoft Access 2003 or 2007, or a compatible format, entitled "PE13_016_SERVICE PLAN DATA."

- A2. The requested information is provided in Enclosure 2 - Service Contracts CONF BUS INFO, including PE13_016_Service_Plan Data CONF BUS INFO.msb, which has been submitted under separate cover to the NHTSA Chief Counsel's Office with a request for confidential treatment.
3. **State, by model, engine and model year, the number of each of the following, received by Chrysler, or of which Chrysler is otherwise aware, which relate to, or may relate to, the alleged defect in MY 2006 Chrysler 300C, Dodge Charger and Magnum 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;**
 - e. **Third-party arbitration proceedings where Chrysler is or was a party to the arbitration; and**
 - f. **Lawsuits, both pending and closed, in which Chrysler is or was a defendant or codefendant.**

For subparts "a" through "d," 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 "f," provide a summary description of the alleged problem and causal and contributing factors and Chrysler's assessment of the problem, with a summary of the significant underlying facts and evidence. For items "e" and "f," 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.

- A3. The following summarizes the reports identified by Chrysler that relate to, or may relate to, the alleged defect in the subject vehicles. Chrysler has conducted a reasonable and diligent search of the normal repositories of such information.
- a. There are 388 consumer complaints (Customer Assistance Inquiry Request (CAIR) and Customer Promoter Score (CPS) narratives) that may relate to the alleged condition for the subject vehicle, which represent 357 unique VINs.

- b. There are 1,127 field reports that may relate to the alleged condition which represent 1,032 unique VINs.
- c. There are three consumer complaints and three legal claims alleging a crash in the subject vehicles that may relate to the alleged condition, which represent four unique VINs. There is one consumer complaint injury claim.
- d. There are three consumer complaints and three legal claims alleging property damage in the subject vehicles that may relate to the alleged condition, which represent four unique VINs.
- e. There are no third-party arbitration proceedings involving Chrysler for the subject vehicles.
- f. There are 60 legal claims involving the subject vehicles that may relate to the alleged condition.

Based on the analysis of these complaints for the subject vehicles, Chrysler has determined that all of the responsive reported data relates to 1,348 unique VINs.

Summary descriptions of the alleged condition, causal and contributing factors, and Chrysler's assessment of the problem, to the extent available, are included in Enclosure 5 – Field Data. These summaries include the significant underlying facts and evidence, when available.

- 4. Separately, for each item (complaint, report, claim, notice, or matter) within the scope of your response to Request No. 3, state the following information:**
- a. Chrysler's file number or other identifier used;**
 - b. The category of the item, as identified in Request No. 3 (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 model and model year;**
 - f. Vehicle's mileage at time of incident;**
 - g. Incident date;**
 - h. Report or claim date;**
 - i. Whether a crash is alleged;**
 - j. Whether property damage is alleged;**
 - k. Number of alleged injuries, if any; and**
 - l. Number of alleged fatalities, if any..**

Provide this information in Microsoft Access 2003 or 2007, or a compatible format, entitled "PE13_016_REQUEST NUMBER FOUR DATA."

- A4. The detailed response that lists the consumer complaints, field reports and legal claims from Request No. 3, as requested in Items a. through l. is provided in Enclosure 4 – Request Number Three Data in a Microsoft Access 2010 table, titled “PE13_016_REQUEST NUMBER FOUR DATA.mdb”.
- 5. Produce copies of all documents related to each item within the scope of Request No. 3. Organize the documents separately by category (i.e., consumer complaints, field reports, etc.) and describe the method Chrysler used for organizing the documents.**
- A5. Copies of all documents within the scope of Question No. 3 are provided in Enclosure 5 – Field Data. The documents for the subject and peer vehicles contain consumer complaint reports, field reports and legal claims. The customer complaint summaries are submitted in one .pdf file and the related documents are arranged in folders by complaint number.
- 6. State, by model, engine and model year, total counts for all of the following categories of claims, collectively, that have been paid by Chrysler to date that relate to, or may relate to, the alleged defect in MY 2006 Chrysler 300C, Dodge Charger and Magnum 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. Chrysler’s claim number;
- b. Vehicle owner or fleet name (and fleet contact person) and telephone number;
- c. VIN;
- d. Repair date;
- e. Whether a claim for towing was made within five days of the claim date;
- f. Vehicle mileage at time of repair;
- g. Repairing dealer’s or facility’s name, telephone number, city and state or ZIP code;
- h. Labor operation number and description;
- i. Problem code and description;
- j. Replacement part number(s) and description(s);
- k. Concern stated by customer;
- l. Cause and Correction stated by dealer/technician; and
- m. Additional comments, if any, by dealer/technician relating to claim and/or repair.

Provide this information in Microsoft Access 2003 or 2007, or a compatible format, entitled "PE13_016_WARRANTY DATA."

- A6. The total number of warranty claims that may relate to the alleged defect for the subject vehicles are listed below.

Description of Repair	Labor Operation	Fail Code	Number of Warranty Claims
Module, powertrain control (PCM) - Test and replace All other engines	08190601	DO – Die Out	1,102
Sensor, Oxygen - Test and replace 2.7-3.5-3.7-4.7-5.7-6.1 Liter Engine - Upstream - Right Side	25017014	DO – Die Out	0
Sensor, Oxygen - Test and replace 2.7-3.5-3.7-4.7-5.7-6.1 Liter Engine - Upstream - Left Side	25017015	DO – Die Out	0
Sensor, Oxygen - Test and replace 2.7-3.5-3.7-4.7-5.7-6.1 liter engine - Downstream - Right side	25017016	DO – Die Out	0
Sensor, Oxygen - Test and replace 2.7-3.5-3.7-4.7-5.7-6.1 liter engine - Downstream - Left side	25017017	DO – Die Out	6
Engine, Trouble Not Found - No repair/Trouble Not Found Engine	85410900	Y2 – Stalls	106
Exhaust, Trouble Not Found - No repair/Trouble Not Found Exhaust	85411100	Y2 – Stalls	1

It should be noted that there are no specific failure codes for "stall while driving" or "stall following refueling" and the above list contains the only failure codes that could reasonably be related to the alleged condition.

Not all of the warranty claims are necessarily related to the alleged condition as there are other reasons to replace certain components, such as the powertrain control module and oxygen sensor. The number of warranty claims that are being reported may be artificially high with regard to the alleged condition. Thus, Chrysler has not drawn conclusions regarding trends from the warranty data alone.

The detailed response that lists the warranty claims is provided in Enclosure 6 – Warranty Data, “PE13_016_WARRANTY DATA .mdb”.

7. Describe in detail the search criteria used by Chrysler to identify the claims identified in response to Request No. 6, 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 alleged defect in the subject vehicles. State, by make and model year, the terms of the new vehicle warranty coverage offered by Chrysler on the subject vehicles (i.e., the number of months and mileage for which coverage is provided and the vehicle systems that are covered).

A7. Chrysler searched warranty labor operations that contained a failure code related to “die out” or “stall” and can be seen in the table below:

Description of Repair	Labor Operation	Fail Code
Module, powertrain control (PCM) - Test and replace All other engines	08190601	DO – Die Out
Sensor, Oxygen - Test and replace 2.7-3.5-3.7-4.7-5.7-6.1 Liter Engine - Upstream - Right Side	25017014	DO – Die Out
Sensor, Oxygen - Test and replace 2.7-3.5-3.7-4.7-5.7-6.1 Liter Engine - Upstream - Left Side	25017015	DO – Die Out
Sensor, Oxygen - Test and replace 2.7-3.5-3.7-4.7-5.7-6.1 liter engine - Downstream - Right side	25017016	DO – Die Out
Sensor, Oxygen - Test and replace 2.7-3.5-3.7-4.7-5.7-6.1 liter engine - Downstream - Left side	25017017	DO – Die Out
Engine, Trouble Not Found - No repair/Trouble Not Found Engine	85410900	Y2 – Stalls
Exhaust, Trouble Not Found - No repair/Trouble Not Found Exhaust	85411100	Y2 – Stalls

It should be noted that there are no specific failure codes for “stall while driving” or “stall following refueling” and the above list contains the only failure codes that could reasonably be related to the alleged condition.

The standard warranty coverage offered for the subject vehicles was 36 months / 36,000 miles. At the expiration of the 3 year/36,000 mile standard warranty, the manufacturer extended to the original purchaser or retail lessee of each 2006 model year subject vehicle sold and delivered on or after July 26, 2007 a limited powertrain warranty for the lifetime of that original purchaser or retail lessee.

- 8. Produce copies of all service, warranty, and other documents that relate to, or may relate to, the alleged defect in the subject vehicles, that Chrysler has issued to any dealers, regional or zone offices, field offices, fleet purchasers, or other entities. This includes, but is not limited to, bulletin, 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 Chrysler is planning to issue within the next 120 days.**
- A8. There are no GPOP tech tips, Technical Service Bulletins or informational documents related to the alleged condition for the subject vehicles that have been issued to Chrysler dealers, Business Centers, fleet purchasers or other such entities. There are also no such communications or informational documents currently planned for the next 120 days.