



FIAT CHRYSLER AUTOMOBILES

August 6, 2015

Mr. Scott Yon, Chief
Office of Defects Investigation, NVS-212
U.S. Department of Transportation

National Highway Traffic Safety Administration ("NHTSA")
Office of Defects Investigation ("ODI")
Room W48-314
1200 New Jersey Avenue SE
Washington, D.C. 20590

Reference: NVS-212sly; PE15-027

Dear Mr. Yon:

Attached is FCA US LLC's ("FCA US") response of the referenced information request. The attached constitutes a full submission to PE15-027.

By providing the information contained herein, FCA US is not waiving its claim to attorney work product and attorney-client privileged communications.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Stephen Williams', is written over the word 'Sincerely,'.

Stephen Williams
Head of Vehicle Safety Compliance and Product Analysis

Attachment and Enclosures

Preliminary Statement

On April 30, 2009 Chrysler LLC, the entity that manufactured and sold the certain vehicles that may be discussed in 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 later 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).

Effective December 15, 2014, Chrysler Group LLC changed its name to FCA US LLC (“FCA US”).

Note: Unless indicated otherwise in the response to a question, this document contains information up to June 23, 2015, the date this Information Request was received.

This attachment contains FCA US’ response to Questions 1 through 4 as clarified with the National Highway Traffic Safety Administration’s (“NHTSA”) Office of Defect Investigations (“ODI”) on July 23rd.

- **Response for Question #1 includes information requested for FCA US vehicles equipped with Driver Air Bags produced by ARC Automotive, Inc. between SOP and October 2004.**
- **Response for Questions #2, #3 and #4 includes information requested for FCA US vehicles equipped with Air Bags in every position produced by ARC Automotive, Inc.**

FCA US requested confirmation of the clarification to Mr. Scott Yon July 23, 2015.

FCA US received confirmation of the clarification from Mr. Scott. Yon July 23, 2015

1. **State, by model and model year, the number of subject vehicles equipped with the subject component Chrysler has manufactured, during the subject production time frame, for sale or lease in the United States. Separately, for each subject vehicle equipped with the subject component manufactured by Chrysler, during the subject production time frame, state the following:**
 - a. **Vehicle identification number (VIN);**
 - b. **Make;**
 - c. **Model;**
 - d. **Model Year;**
 - e. **Subject component part number and design version installed as original equipment;**
 - 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).**

Describe in detail the process Chrysler used to determine the subject vehicle population equipped with the subject component, including why Chrysler believes the process was thorough and comprehensive. Provide the table in Microsoft Access 2010, or a compatible format, entitled "PRODUCTION DATA."

- A1. The subparts (a) through (h) are located in ENCLOSURE 1 and titled PE15027_ PRODUCTION DATA.accdb.

2. **State 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 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;**
 - 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 "f" 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 item "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.

- A2. FCA US has conducted a reasonable and diligent search of the normal repositories of such information. FCA US has identified a total of two reports which relate to, or may relate to, the alleged defect in the subject vehicles representing two unique VINs.

- a. FCA US identified one consumer complaint (Customer Assistance Inquiry Request or CAIR and Customer Promoter Score or CPS) which relates to, or may relate to, the alleged defect in the subject vehicles, which represent one unique VIN.
- b. FCA US identified zero field reports which relate to, or may relate to, the alleged defect in the subject vehicles, which represent zero unique VINs.
- c. FCA US identified two reports involving a crash, which includes three injuries, and zero reports of fatality which relate to, or may relate to, the alleged defect in the subject vehicles, which represent two unique VINs.
- d. FCA US identified zero reports of property damage claims which relate to, or may relate to the alleged defect in the subject vehicles, which represent zero unique VINs.
- e. FCA US identified zero reports of third-party arbitration proceedings where FCA US is or was a party to the arbitration which relates to, or may relate to the alleged defect in the subject vehicles, which represent zero unique VINs.
- f. FCA US identified one legal claim, both pending and closed, in which FCA US is or was a defendant or codefendant that relate to, or may relate to the alleged defect in the subject vehicles, which represent one unique VIN.

FCA US is aware of only one field incident, involving a 2002 Town & Country, which occurred in Ashtabula, Ohio on January 29, 2009, that can, with a reasonable degree of certainty, be attributed to an ARC airbag inflator malfunction.

FCA US is including one other consumer complaint (CAIR #26037371) where the customer reported to FCA US that she was involved in an injury crash in January, 2014 (struck a snow bank with frontal air bag deployments), but she did not notify FCA US of the crash until 11 months later, in December 2014. By the time this alleged crash was reported to FCS US, the vehicle had been scrapped as a total loss by the insurer and FCA US was unable to inspect the vehicle (FCA US further notes this report was received after the well-publicized investigation involving Takata air bag inflators.) The complaint made to FCA US provides only limited detail regarding the crash and injury mechanism. FCA US conducted a preliminary VOQ search and was unable to identify any complaints to NHTSA from this owner. FCA US is pursuing additional information regarding the incident from the local authorities (police and/or EMS) and, if new information is obtained, FCA US will provide an update to ODI.

- 3. 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. **Chrysler'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), street address, email 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 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 2010, or a compatible format, entitled "REQUEST NUMBER TWO DATA."

- A3. The subparts (a) through (l) are located in ENCLOSURE 3 and titled REQUEST NUMBER THREE DATA.accdb.
- 4. Produce copies of all documents related to each item within the scope of Request No. 2. Organize the documents separately by category (i.e., consumer complaints, field reports, etc.) and describe the method Chrysler used for organizing the documents. Describe in detail the search methods and search criteria used by Chrysler to identify the items in response to Request No. 2.**
- A4. The copies of the available documents related to each item within the scope of Q2 can be found in ENCLOSURE 4, which includes one consumer complaint and one legal claim. The consumer complaint summary is submitted in one .pdf file and there are no other documents related to this consumer complaint. The legal summary and the available supporting materials are contained in a folder by the claimant's name.
- FCA US has conducted a reasonable and diligent search of the normal repositories of such information. The subject vehicle population for Q2 was defined by ARC airbag inflator usage charts contained in ENCLOSURE 4 (See Model and Model Year ARC Table.pdf), which contains the vehicle model, model year, and airbag position where ARC inflators were used. Words reasonably related to the reports sought by this Information Request were then applied in two steps (as noted in Figure 1, below): 1) an initial search was performed to gather consumer complaints containing both a word from Grouping 1 and a word from Grouping 2; and 2) the results of the initial search were then further refined using the words contained in Grouping 3. The results of this refined search were then subjected to an eyes-on review to determine if they relate to, or may relate to the alleged defect.

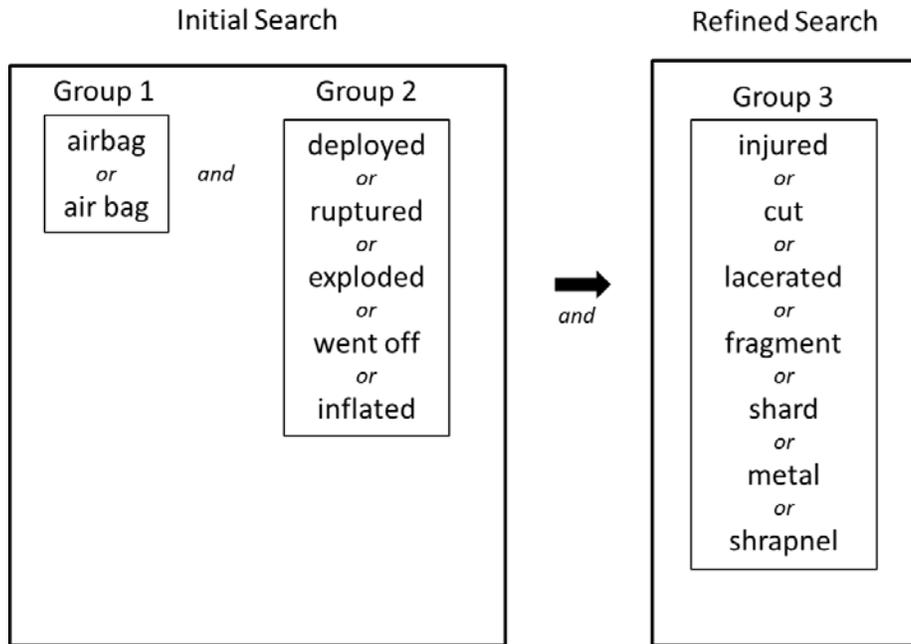


Figure 1: Word Search for PE15-027

The final result of this search is described in A2 and the available documents are contained in ENCLOSURE 4.