

Howell, Rosa (NHTSA)

From: Yon, Scott (NHTSA)
Sent: Thursday, June 09, 2011 8:11 AM
To: Howell, Rosa (NHTSA)
Cc: Reid, Randy (NHTSA); Hershman, Larry (NHTSA); Borris, Frank (NHTSA)
Subject: Please add to PE10-031
Attachments: NHTSA Review of FARS Data May 2011 PUBLIC.PDF

Rosa,

Can you add the attached file to the public repository for PE10-031 as a MEMO TO FILE with the following description "Non-confidential portion of the April 6, 2011 Chrysler presentation to ODI, see also INME-PE10031-45307P.pdf." Sorry for the rush but this needs to be done ASAP, and please let Larry and I know when it's up. Thanks Rosa.

Scott

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1993-2004 MY Grand Cherokee Chrysler's Analysis of FARS Data

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Background and History

- **October 2, 2009 –NHTSA Receives original Petition to Open an Investigation**
 - Alleged 44 crashes with fatalities where fire was the most harmful event (MHE)
- **August 23, 2010 – NHTSA Grants Original Petition and Opens Investigation**
 - Initial assessment of NHTSA fire database indicates:
 - 44 crashes of all types with occupant fatalities where fire was the MHE
 - 10 rear impact crashes with occupant fatalities where fire was the MHE
- **November 12, 2010 – Chrysler Group LLC “Chrysler” Submits Its Response**
 - Total of 26 unique rear impact crashes that appear responsive to the investigation
- **December 10, 2010 –NHTSA Receives Petition #2 to Modify Investigation Criteria**
 - Also include rollover accidents and fatalities that occurred in the bullet vehicle
 - Petition #2 now alleges that there would be 35 crashes with fatalities



Initial Submission (11-12-2010)

- **Initial Submission – Data Considered**

- **EWR (Rock Filter)**

- **NHTSA FARS** (rear impacts with fatalities in the SUV with fire = MHE)

- **State Databases**

- Using sort criteria less severe than events only involving fatality

- Larger Sample Size than FARS

- Chose states that can:

- Sort by tow away crashes (significant events, but not exclusive to events only involving fatality)

- Large vehicle population (sample size)

- Provides fire information at the vehicle level rather than the accident level



Initial Assessment - NHTSA's EWR Data

- Initial Rock Filter to assess if the subject vehicles are over-represented in fire events

Vehicles (1993-2004 MYs)	Total # Fire Events	Production Volumes	# Deaths	# Injuries
Jeep Grand Cherokee	26	2,968,914	8	21
GM Blazer*	45	2,771,241	22	45
Ford Explorer*	44	4,014,540	32	57
Toyota 4Runner*	3	1,128,360	0	3

NOTE:

- Includes ALL reports of fire
- Data is time limited in that data includes inputs since the 2nd quarter of 2003 and does not include vehicles more than ten years old

Chrysler Group examined the TREAD EWR data and confirmed that the 1993-2004 Jeep Grand Cherokee vehicles are not over-represented in the available EWR data.



11-12-2010

FARS Data Assessment

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Fatality Analysis Reporting System (FARS)

Analysis of Crash Data

- FARS data 1992-2009
- Model years cover 1993-2004
- ZJ platform and WJ platform data were combined for Grand Cherokee
 - 1993-1998, corresponding to the ZJ platform
 - 1999-2004, corresponding to the WJ platform
- Vehicles used in the analyses
 - Jeep Grand Cherokee
 - Ford Explorer
 - Ford Explorer
 - Mercury Mountaineer
 - Mazda Navajo
 - Honda Passport
 - Isuzu Rodeo
 - Isuzu Trooper
 - Mitsubishi Montero (includes Montero Sport)
 - Nissan Pathfinder
 - GM SUVs / S10 Blazer
 - Chevrolet S10 and T10 Blazer
 - GMC S15 and T15 Jimmy
 - Chevrolet Trailblazer
 - GMC Envoy
 - Oldsmobile Bravada
 - Toyota 4Runner

Note: Not all models of SUVs were made in all model years used in the analyses



Fatality Analysis Reporting System (FARS)

Analysis of Crash Data (continued)

- Vehicles were identified in crash data by using VIN derived information from R.L. Polk's Vina program
- Exposure data, Years of Use (also known as Registered Vehicle Years), were calculated by summing annual registered vehicle populations using R. L. Polk's National Vehicle Population Profile (NVPP)
- Rear impact collision was defined as either initial or principal impact point at clock points 05-07
- Most Harmful Event (MHE) fire was defined as a fire in the crash and the most harmful event code for the crash was 02 (fire)
- Post Collision fire requires any fire code in a vehicle that was involved in a collision, where a collision event precedes the fire
- Rollover if any of the following conditions are true:
 - Crash Year 1992-2009, rollover equals 1 or 2 (first or subsequent event rollover)
 - Crash Year 1992-2009, first harmful event equals 1 (rollover) and vehicle forms submitted equals 1
 - Crash Year 1992-2009, most harmful event equals 1 (rollover)
 - Crash Year 2004-2009, any sequence of event code equals 1 (rollover)



Sample Incident Rate Calculation

This table contains Jeep Grand Cherokee US registration data by Model Year and Year of Registration*

Reg. Year	Model Year												Total	
	1993	1994	1995	1996	1997	1998	1999	2000	2001	2002	2003	2004		
1992	15,557													15,557
1993	152,590													152,590
1994	201,380	185,063												386,443
1995	198,787	215,859	205,594											620,240
1996	192,146	206,275	247,874	213,115	417									859,827
1997	186,201	204,833	241,654	265,931	181,782									1,080,401
1998	180,411	199,728	239,394	254,131	234,468	187,003								1,295,135
1999	171,394	193,034	234,262	252,569	233,814	224,977	189,599							1,499,649
2000	163,764	185,538	225,554	245,998	229,968	224,297	258,487	200,214	1					1,733,821
2001	158,197	179,375	217,590	237,817	222,867	216,903	253,066	267,864	153,083	2				1,906,764
2002	151,247	172,498	209,726	230,680	215,784	214,271	245,484	265,797	196,984	149,021	4			2,051,496
2003	145,330	167,653	202,689	222,840	211,072	207,616	239,147	260,062	192,255	189,037	103,251	48,167		2,189,119
2004	139,625	162,542	196,462	218,004	204,903	203,983	233,767	254,016	190,969	186,545	103,478	238,700		2,332,994
2005	135,294	159,052	193,717	215,808	203,297	202,798	232,005	252,982	188,645	185,680	102,738	287,340		2,359,356
2006	126,766	151,248	186,154	208,635	198,872	198,465	225,851	246,550	184,349	180,885	100,191	281,213		2,289,179
2007	119,757	139,793	174,724	195,281	189,619	191,481	219,554	241,270	180,073	177,706	97,274	275,882		2,202,414
2008	107,796	127,157	161,633	179,930	175,855	181,922	211,157	234,336	174,475	171,644	94,248	266,164		2,086,317
2009	97,807	118,323	153,545	172,924	170,370	175,256	206,227	231,499	174,341	172,470	94,347	265,437		2,032,546
Total	2,644,049	2,767,971	3,090,572	3,113,663	2,673,088	2,428,972	2,514,344	2,454,590	1,635,175	1,412,990	695,531	1,662,903		27,093,848

Years of Use, or Registered Vehicle Years (RVY), found by summing registration data by model year and calendar year

Assume that for MY 1993-2004 Jeep Grand Cherokees, there are 12 incidents.
 Incident Rate = $12 / 27,093,848 * 1,000,000 = 0.44$ incidents per million years of use



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* Registration data from RL Polk and Company

Calculation of 95% Confidence Intervals

- Binomial Distribution Used
 - Trials (exposure, e.g., registered vehicle years)
 - Incidents (outcome of interest, e.g., rear collisions with MHE=fire)
 - Probability of an incident occurring per trial (estimated probability = # of incidents/# of trials)
- Calculation of Upper Limit of the Confidence Interval
 - If the number of incidents is non-zero, the upper limit is calculated as the population incident rate (probability) at which, in the given number of sample trials, the observed number of incidents (or fewer) would occur 2.5% of the time.
 - If the number of incidents is zero, the upper limit is calculated as the population incident rate (probability) at which, in the given number of sample trials the observed number of incidents (or fewer) would occur 5% of the time.
- Calculation of Lower Limit of the Confidence Interval
 - If the number of incidents is non-zero, the lower limit is calculated as the population incident rate (probability) at which, in the given number of sample trials, the observed number of incidents (or more) would occur 2.5% of the time.
 - If the number of incidents is zero, the lower limit is zero



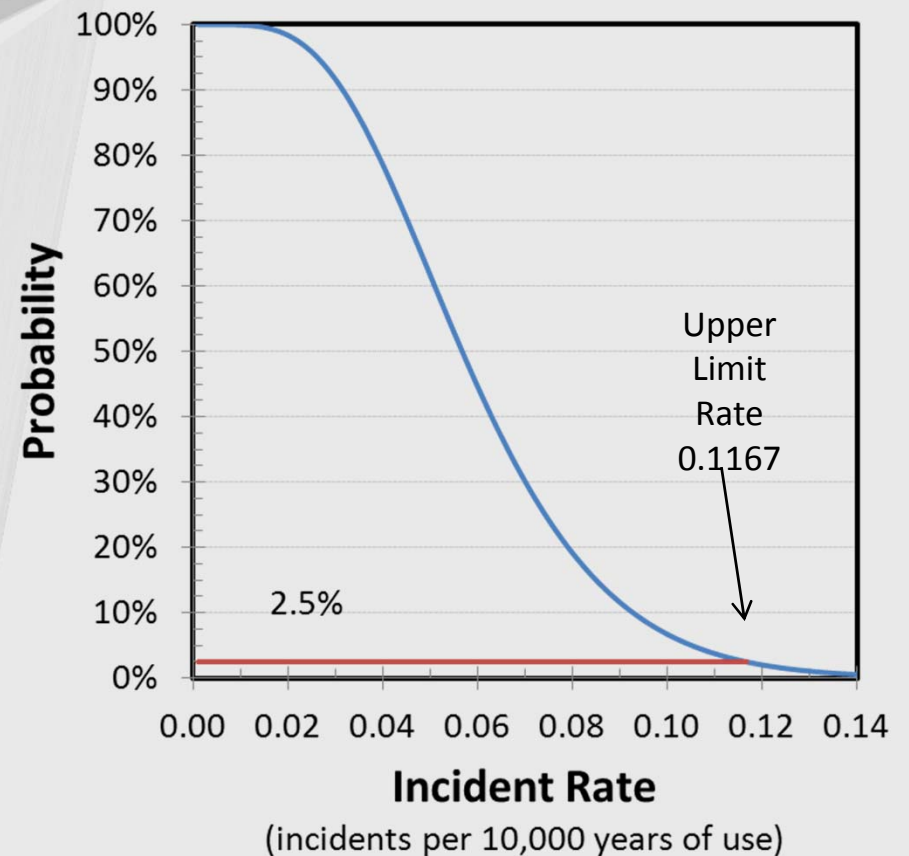
Calculation of 95% Confidence Intervals

Sample Calculation: Upper Limit

Sample calculation

- 5 incidents
- 1,000,000 years of exposure
- Estimated probability = 0.05 incidents/10,000 years of use
- The upper limit is calculated as the population incident rate at which five (5) or fewer incidents would occur 2.5% of the time in 1,000,000 years of exposure
- In this example, the upper limit of the 95% confidence interval corresponds to a rate of 0.1167 incidents per 10,000 years of use

Probability of having 5 or fewer incidents vs. incident rate



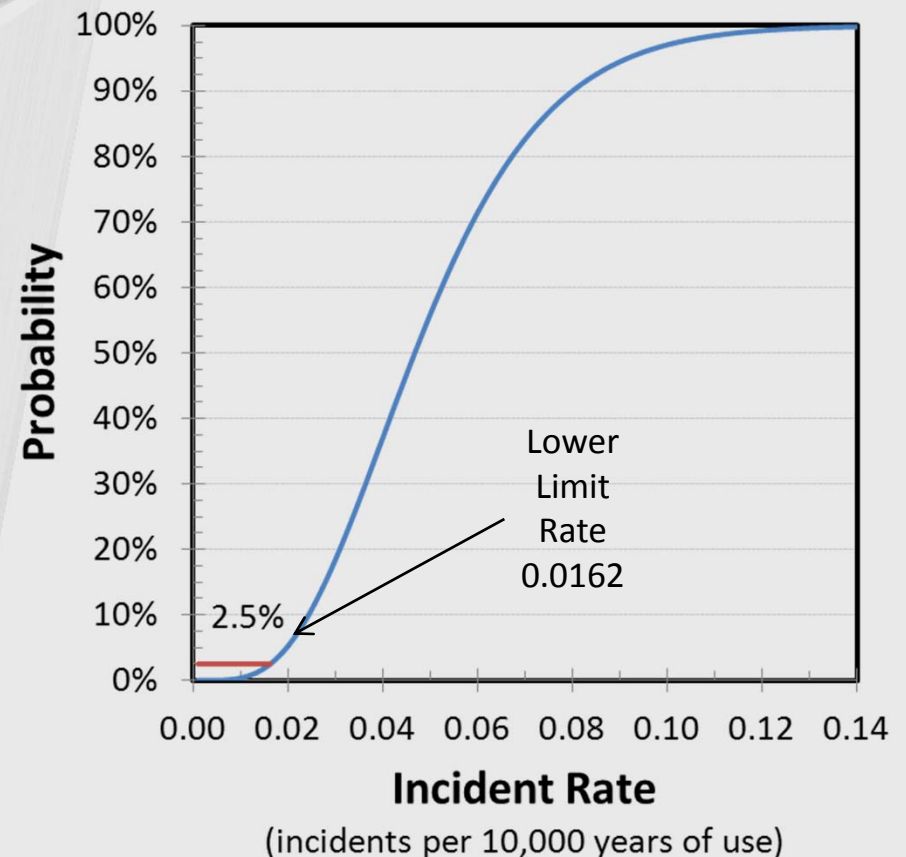
Calculation of 95% Confidence Intervals

Sample Calculation: Lower Limit

Sample calculation

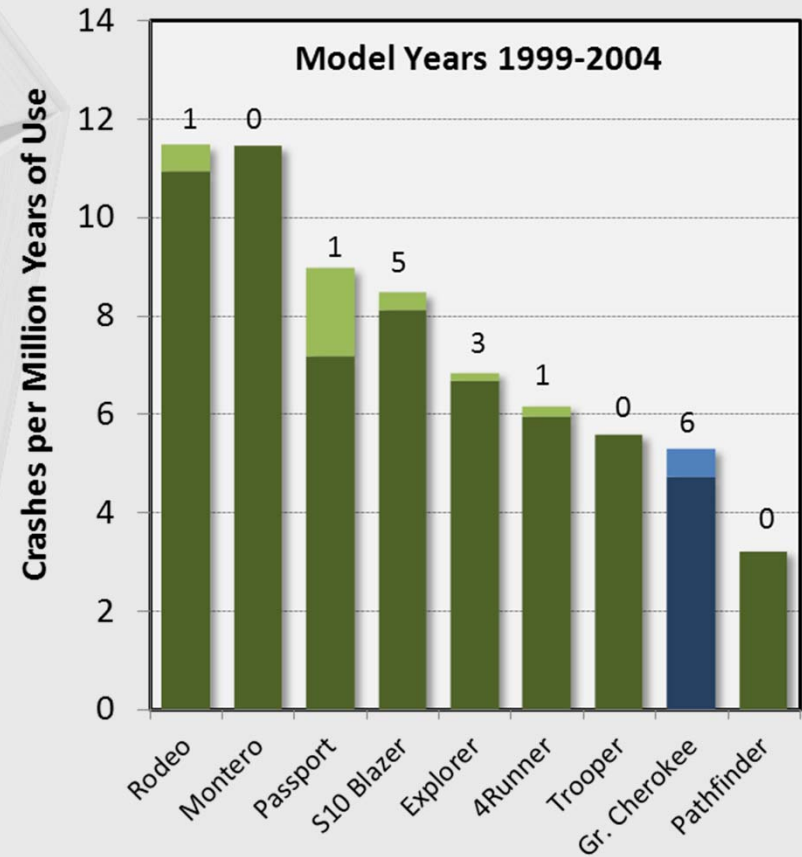
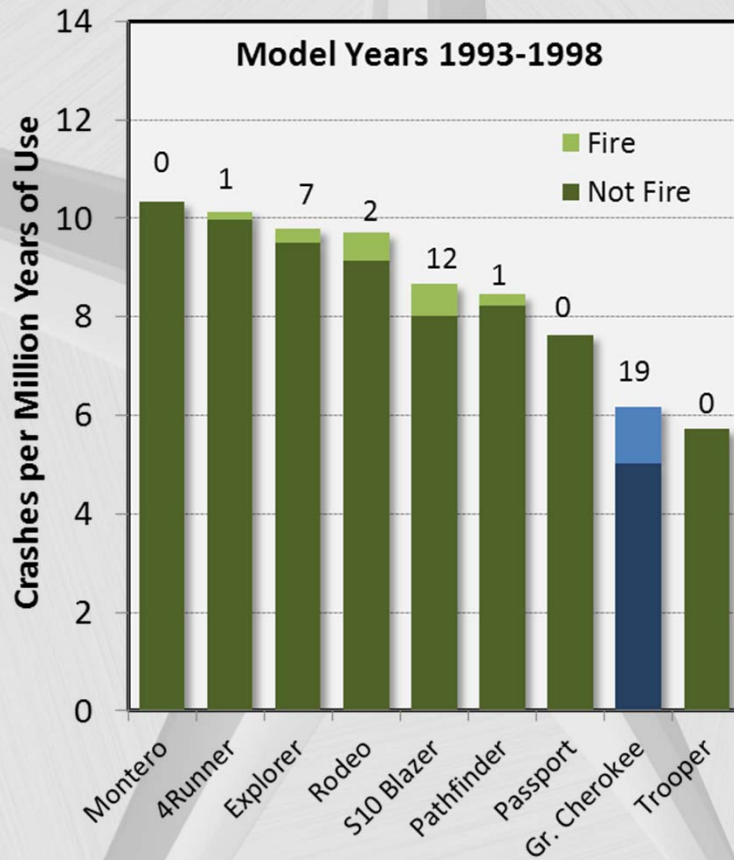
- 5 incidents
- 1,000,000 years of exposure
- Estimated probability = 0.05 incidents/10,000 years of use
- The lower limit is calculated as the population incident rate at which five (5) or more incidents would occur 2.5% of the time in 1,000,000 years of exposure
- In this example, the lower limit of the 95% confidence interval corresponds to a rate of 0.0162 incidents per 10,000 years of use

Probability of having 5 or more incidents vs. incident rate



Initial FARS Assessment – Rear Impacts

Assessment of all rear impacts with fatalities, where fire is not necessarily the MHE

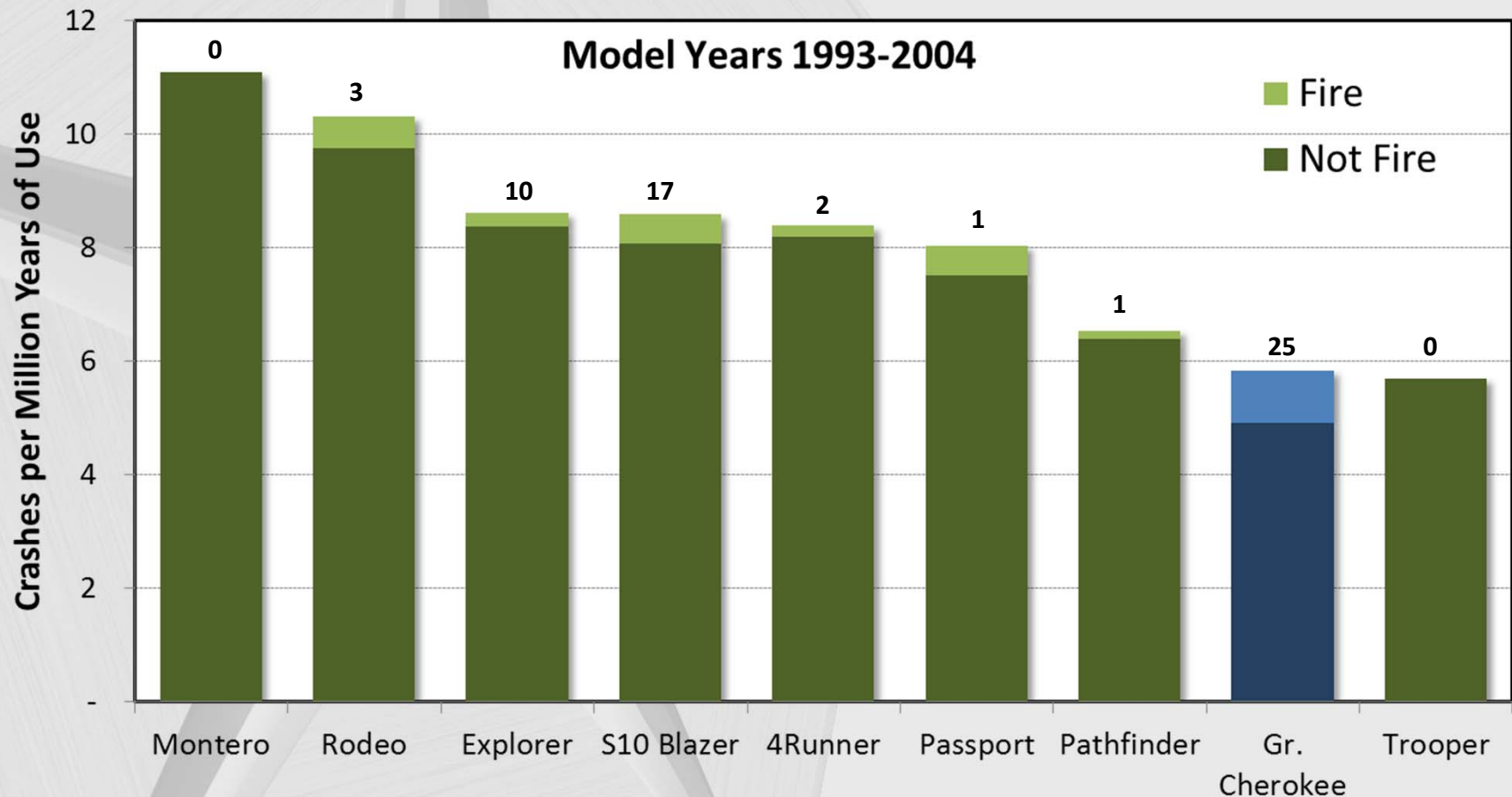


The 1993-2004 Jeep Grand Cherokee vehicles are no more likely to experience a fatality in a rear impact than peer vehicles

FARS data from 1992-2009. Registration data from RL Polk. Rates are not staggered. Includes crashes to the rear of the SUV where either initial or principal impact was coded as 5,6 or 7, with a fatality in the SUV, and where fire is not necessarily the Most Harmful Event. Explorer includes Mountaineer and Navajo. Montero includes Montero Sport. S10 Blazer includes T10 Blazer, Trailblazer, Jimmy, Envoy and Bravada. Numbers above bars are counts of rear fires.

Initial FARS Assessment – Rear Impacts

Assessment of all rear impacts with fatalities, where fire is not necessarily the MHE

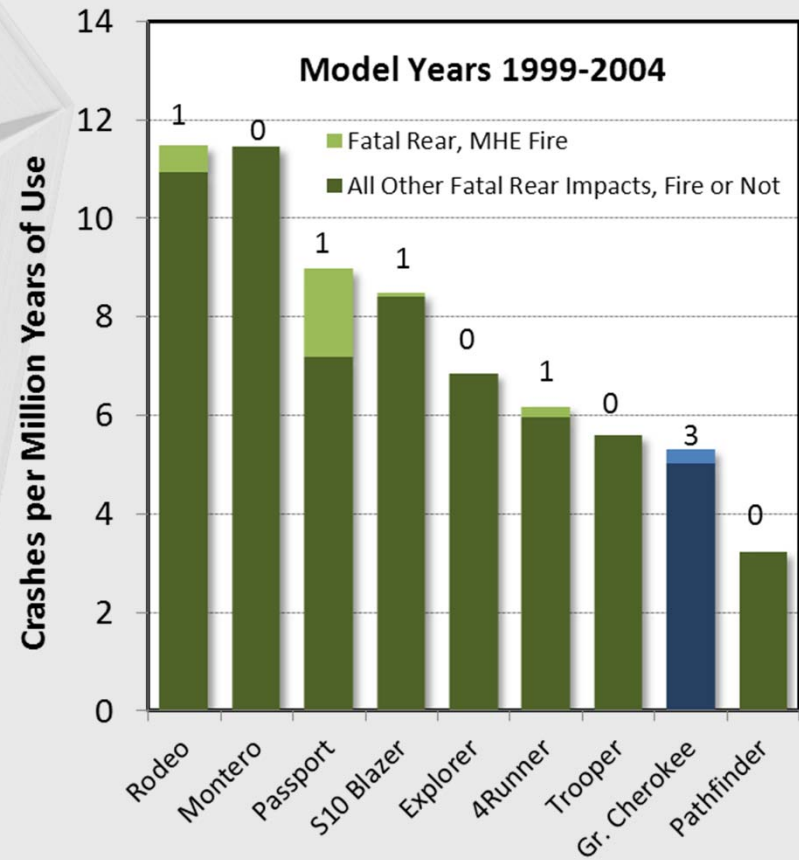
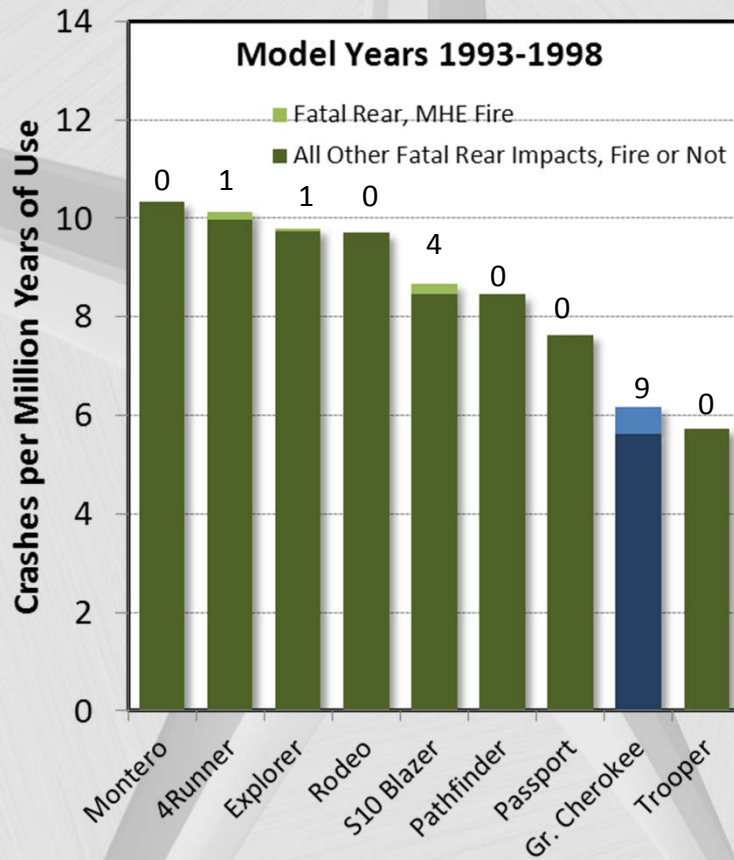


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Initial FARS Assessment – Rear Impacts

Assessment of all fatal rear impacts, identifying crashes with fire as the MHE

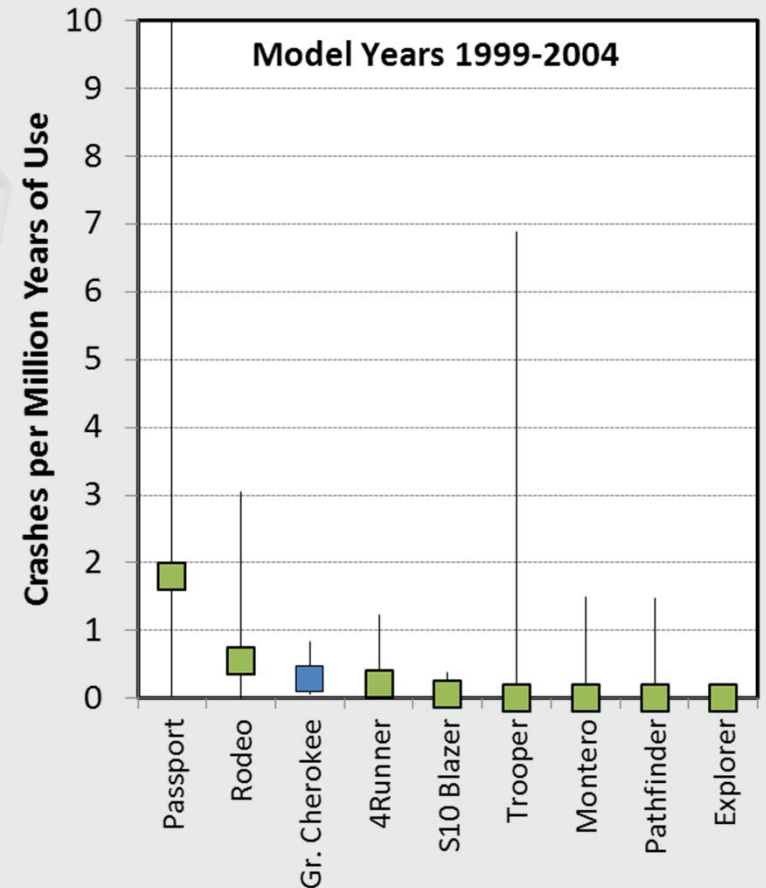
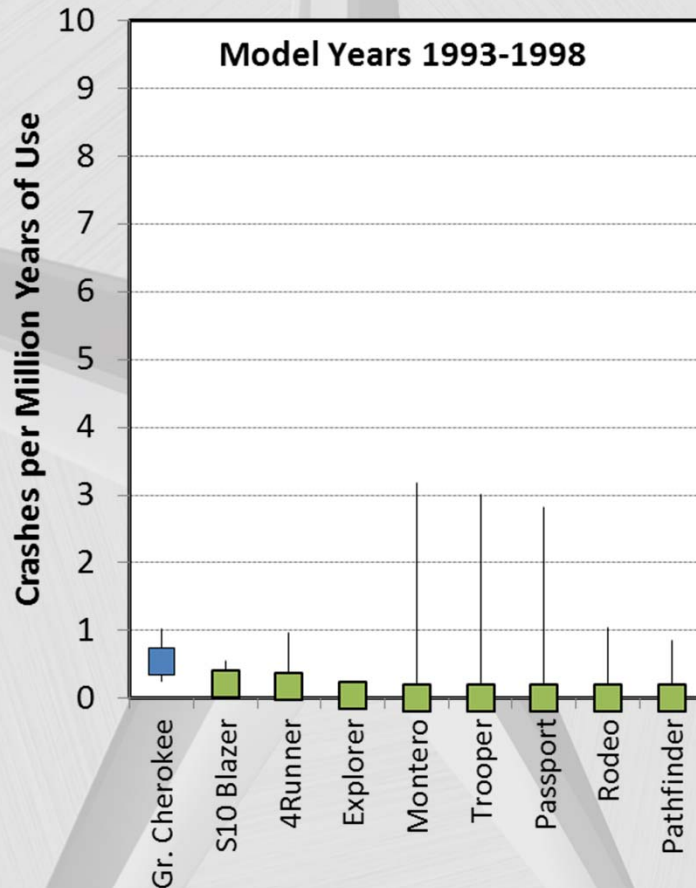


The 1993-2004 Jeep Grand Cherokee vehicles are no more likely to experience a fatality in a rear impact with a fire than the peer vehicles

FARS data from 1992-2009. Registration data from RL Polk. Rates are not staggered. Includes crashes to the rear of the SUV where either initial or principal impact was coded as 5,6 or 7, with a fatality in the SUV, and where fire is the Most Harmful Event. Explorer includes Mountaineer and Navajo. Montero includes Montero Sport. S10 Blazer includes T10 Blazer, Trailblazer, Jimmy, Envoy and Bravada. Numbers above bars are counts of rear fires.

Initial FARS Assessment – Rear Impacts with Fire as MHE

Assessment of rear impacts with fatalities and fire = MHE

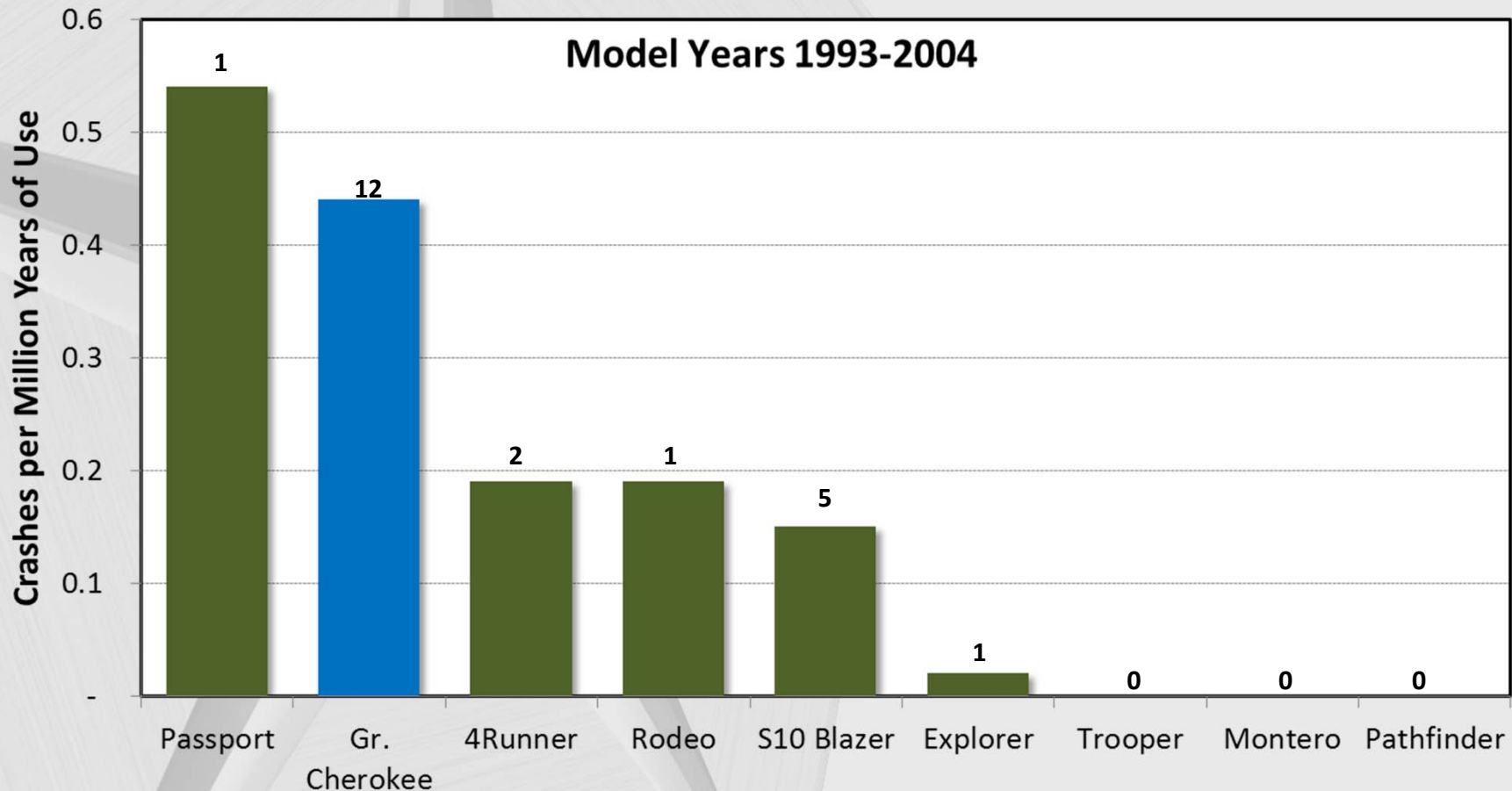


The 1993-2004 Jeep Grand Cherokee vehicles have rates of fatal rear impacts, where fire was the most harmful event, that are comparable to peer SUVs

FARS data from 1992-2009. Registration data from RL Polk. Rates are not staggered. Includes crashes to the rear of the SUV, with a fatality in the SUV, and with Most Harmful Event coded as Fire. Explorer includes Mountaineer and Navajo. Montero includes Montero Sport. S10 Blazer includes T10 Blazer, Trailblazer, Jimmy, Envoy and Bravada. Squares are the calculated rates, and the lines are the 95% confidence intervals about the rates.

Initial FARS Assessment – Rear Impacts with Fire

Assessment of rear impacts with fatalities and fire = MHE

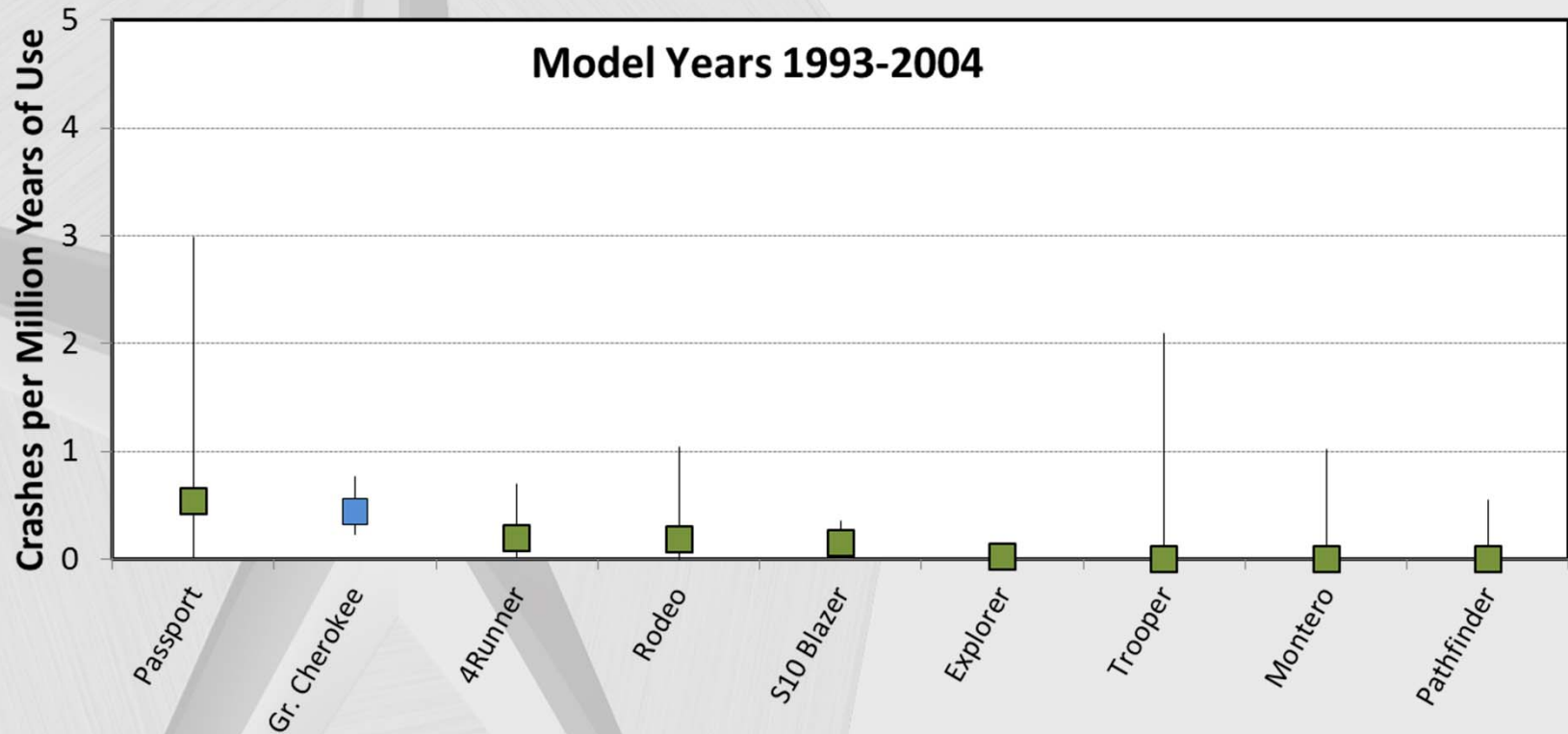


The 1993-2004 Jeep Grand Cherokee vehicles have rates of fatal rear impacts, where fire was the most harmful event, that are comparable to peer SUVs

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Initial FARS Assessment – Rear Impacts with Fire

Assessment of rear impacts with fatalities and fire = MHE



The 1993-2004 Jeep Grand Cherokee vehicles have rates of fatal rear impacts, where fire was the most harmful event, that are comparable to peer SUVs

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Chrysler's Assessment of the NHTSA FARS Data

Key Takeaways:

- Chrysler's assessment of FARS data for calendar years 1992-2009 provides empirical evidence that rear end collisions with a fatality in the SUV, where fire = MHE, are extremely rare for the subject and peer vehicles.
- More importantly, the analysis of FARS incidents demonstrates that the 1993-2004 Jeep Grand Cherokee vehicles are at no greater risk of fatal rear end collisions, where fire = MHE, than peer vehicles.

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State Data Assessment

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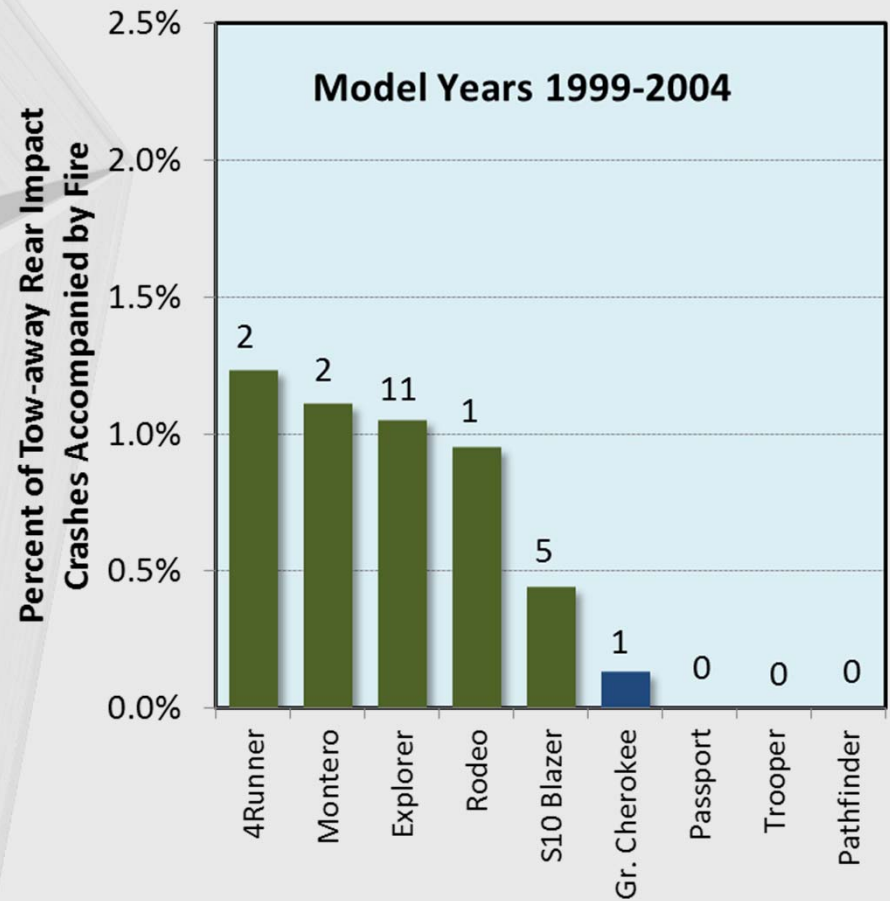
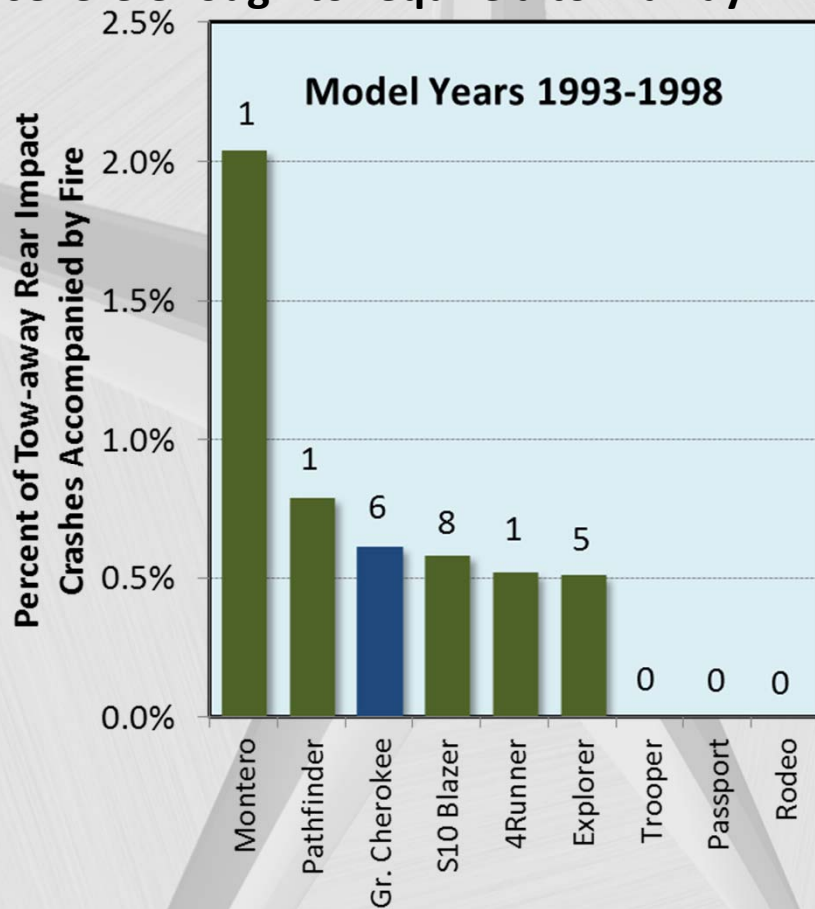
State Accident Data Analysis

- **Chrysler also analyzed multiple State crash databases**
 - Enables assessment to also include less severe events rather than just those that involved a fatality
 - Enables a much larger Sample Size than FARS assessment
 - Analysis includes States that:
 - Can sort by tow away crashes (significant events, but not exclusive to events only involving fatality)
 - Have large vehicle population (sample size)
 - Can provide fire information at the vehicle level rather than the accident level



State Crash Data Analysis - Illinois

Illinois State crash data analysis included over 7,400 rear impact events severe enough to require a tow-away

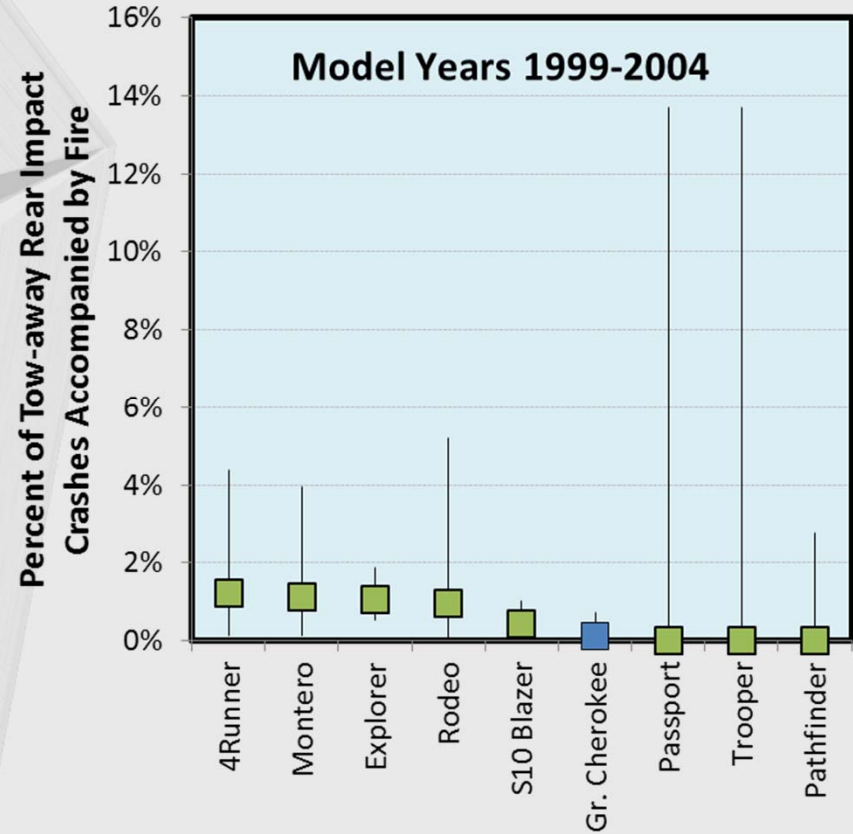
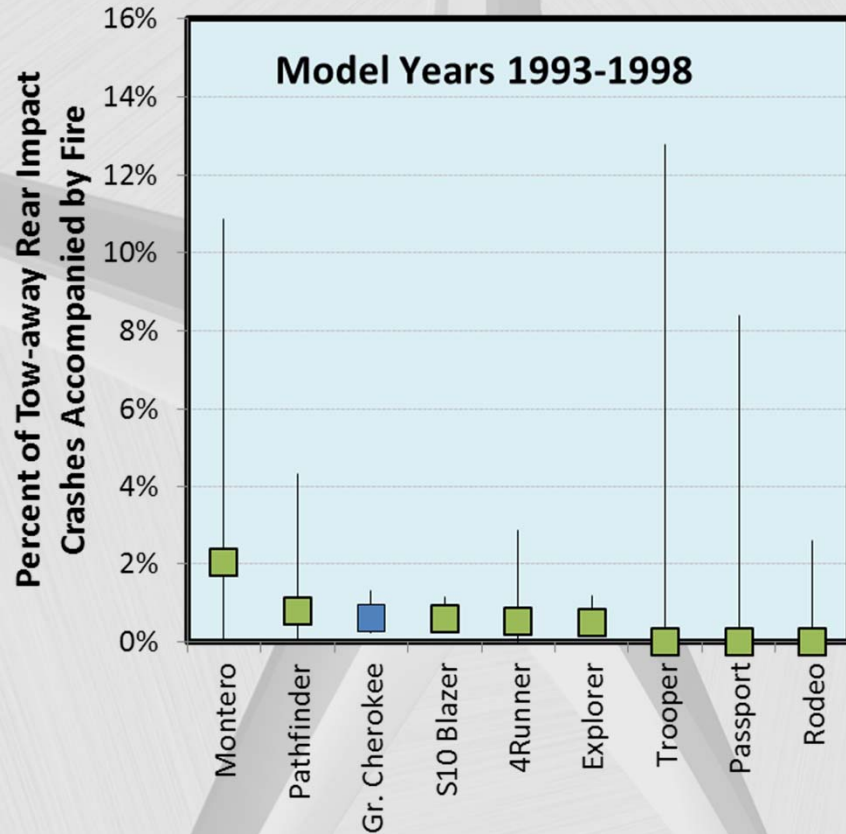


The 1993-2004 Jeep Grand Cherokee vehicles are no more likely to experience a fire in a rear impact crash than the peer vehicles

Illinois State data from 2000-2008. Includes crashes where initial impact to SUV was to the rear, and SUV required towing post-collision. Explorer includes Mountaineer and Navajo. Montero includes Montero Sport. S10 Blazer includes T10 Blazer, Trailblazer, Jimmy, Envoy and Bravada. Numbers above bars are counts of fire-involved rear impact crashes.

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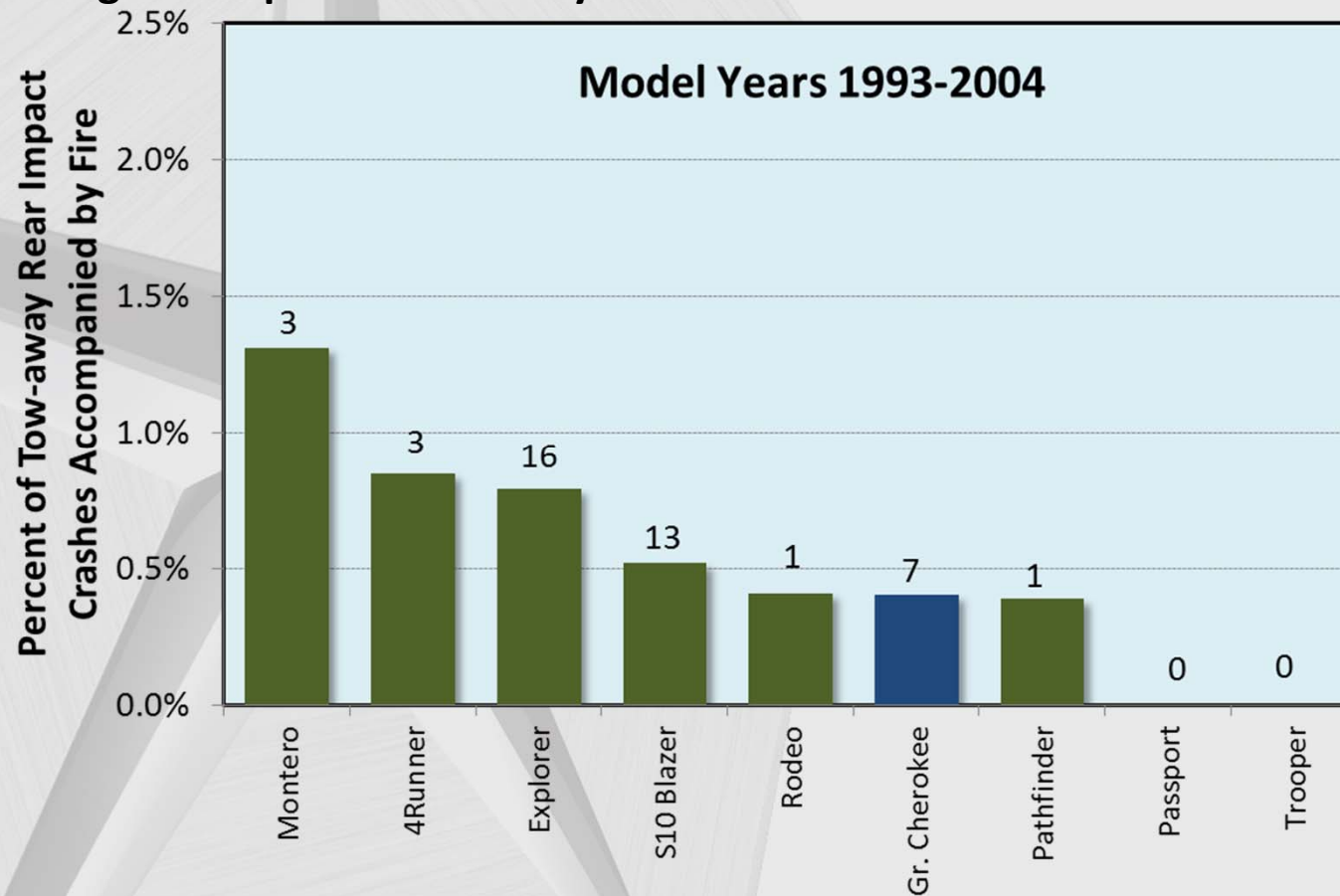


The 1993-2004 Jeep Grand Cherokee vehicles are no more likely to experience a fire in a rear impact crash than the peer vehicles

Illinois State data from 2000-2008. Includes crashes where initial impact to SUV was to the rear, and SUV required towing post-collision. Explorer includes Mountaineer and Navajo. Montero includes Montero Sport. S10 Blazer includes T10 Blazer, Trailblazer, Jimmy, Envoy and Bravada. Squares are the calculated percentage, and the lines are the 95% confidence intervals about the percentages.

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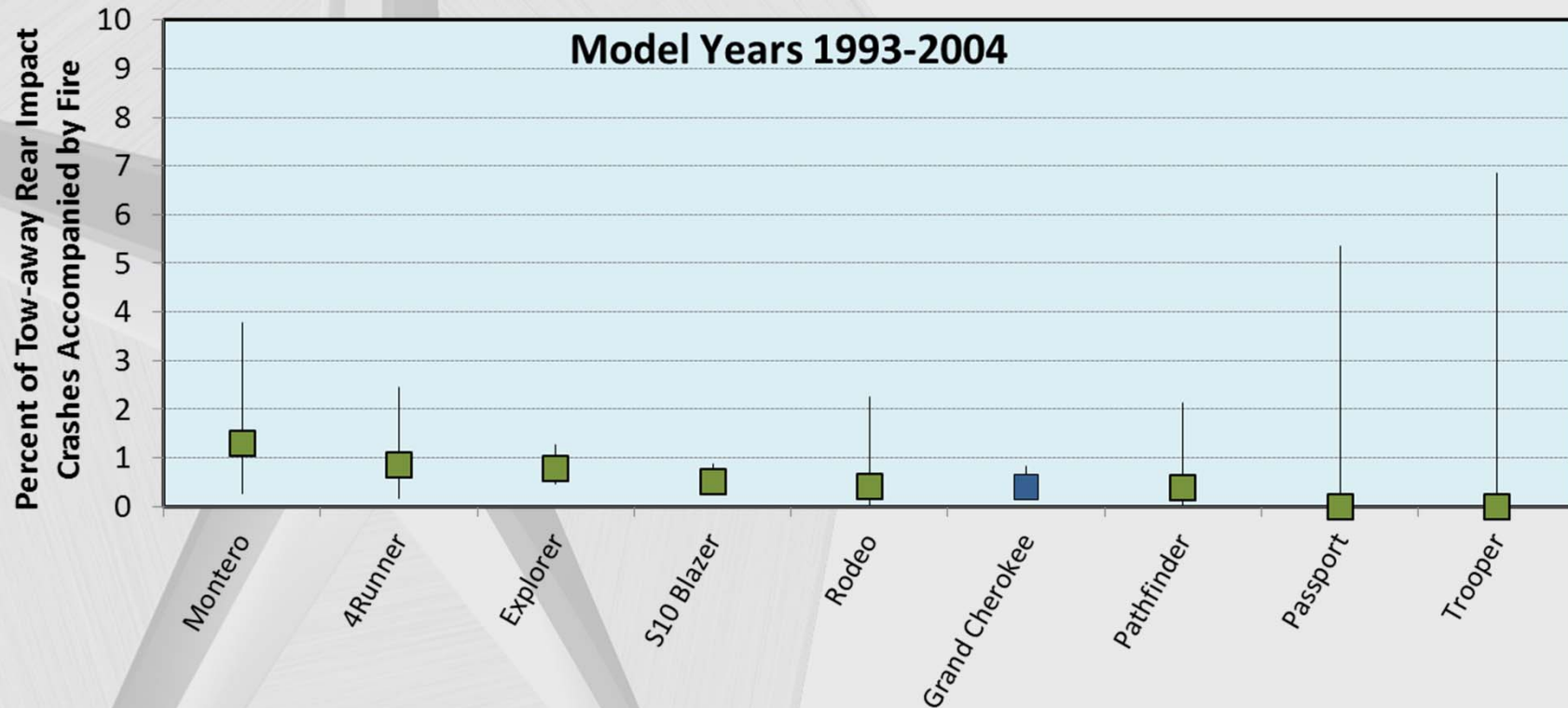


The 1993-2004 Jeep Grand Cherokee vehicles are no more likely to experience a fire in a rear impact crash than the peer vehicles

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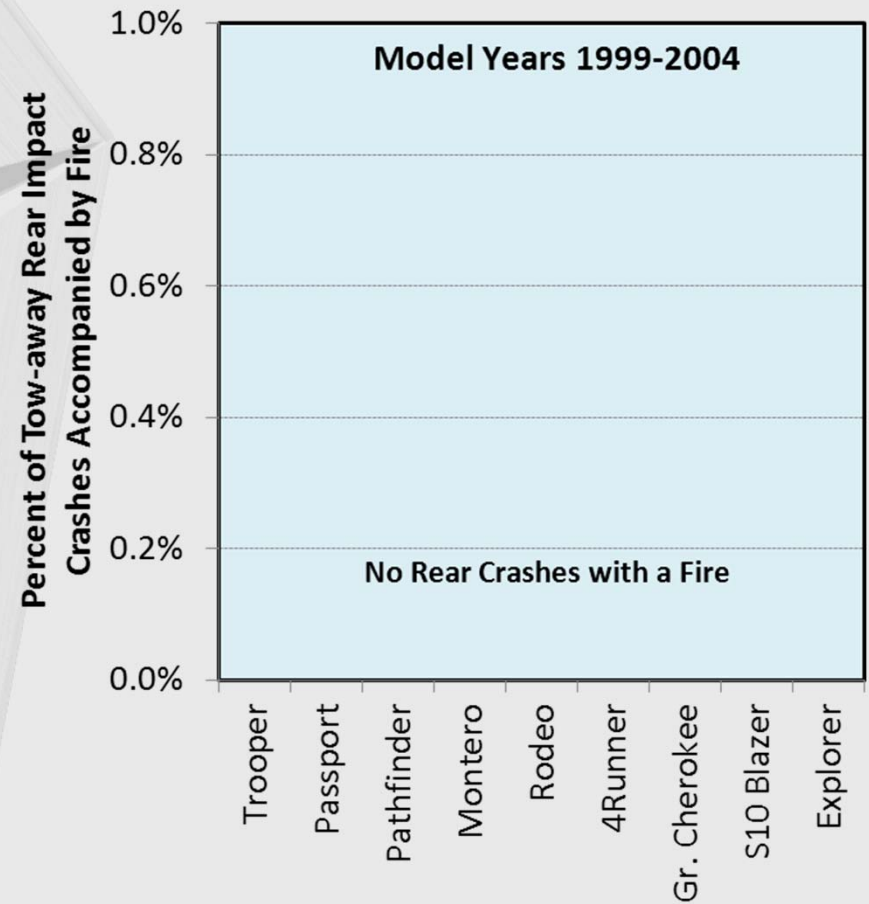
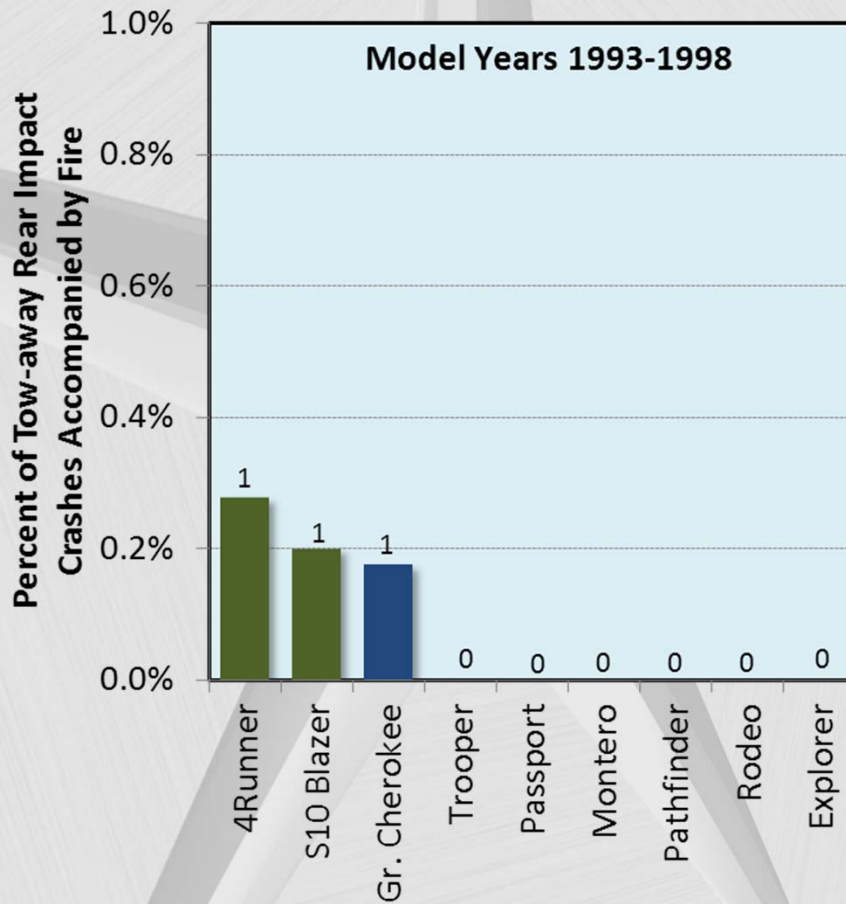


The 1993-2004 Jeep Grand Cherokee vehicles are no more likely to experience a fire in a rear impact crash than the peer vehicles

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State Crash Data Analysis - Florida

Florida State crash data analysis included over 6,000 rear impact events severe enough to require a tow-away

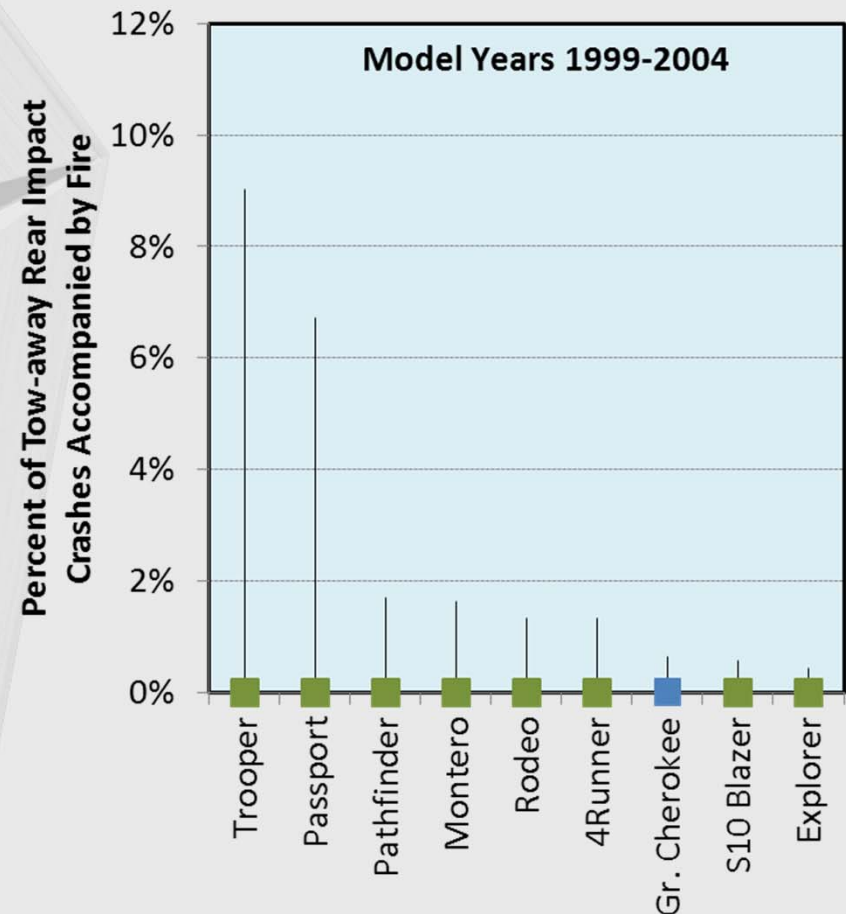
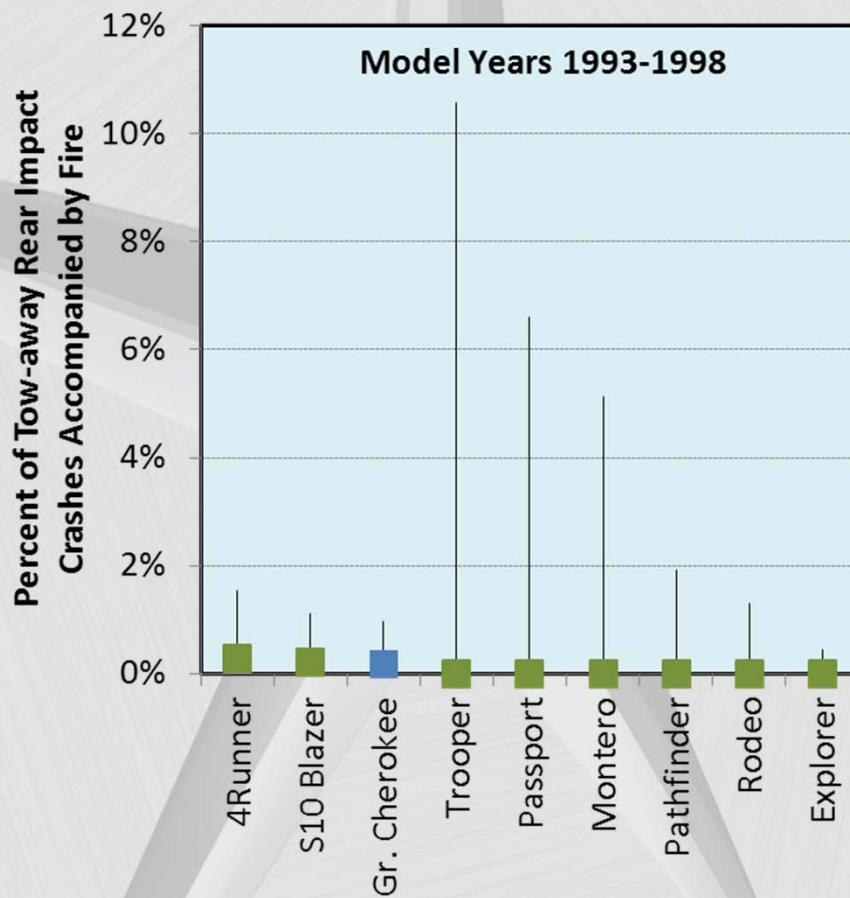


The 1993-2004 Jeep Grand Cherokee vehicles are no more likely to experience a fire in a rear impact crash than the peer vehicles

Florida State data from 2002-2008. Includes crashes where initial impact to SUV was to the rear, and SUV required towing post-collision. Explorer includes Mountaineer and Navajo. Montero includes Montero Sport. S10 Blazer includes T10 Blazer, Trailblazer, Jimmy, Envoy and Bravada. Numbers above bars are counts of fire-involved rear impact crashes. Grand Cherokee fire is crash #72772419, coded as fire in FARS, but not in Florida.

State Crash Data Analysis - Florida

Florida State crash data analysis included over 6,000 rear impact events severe enough to require a tow-away

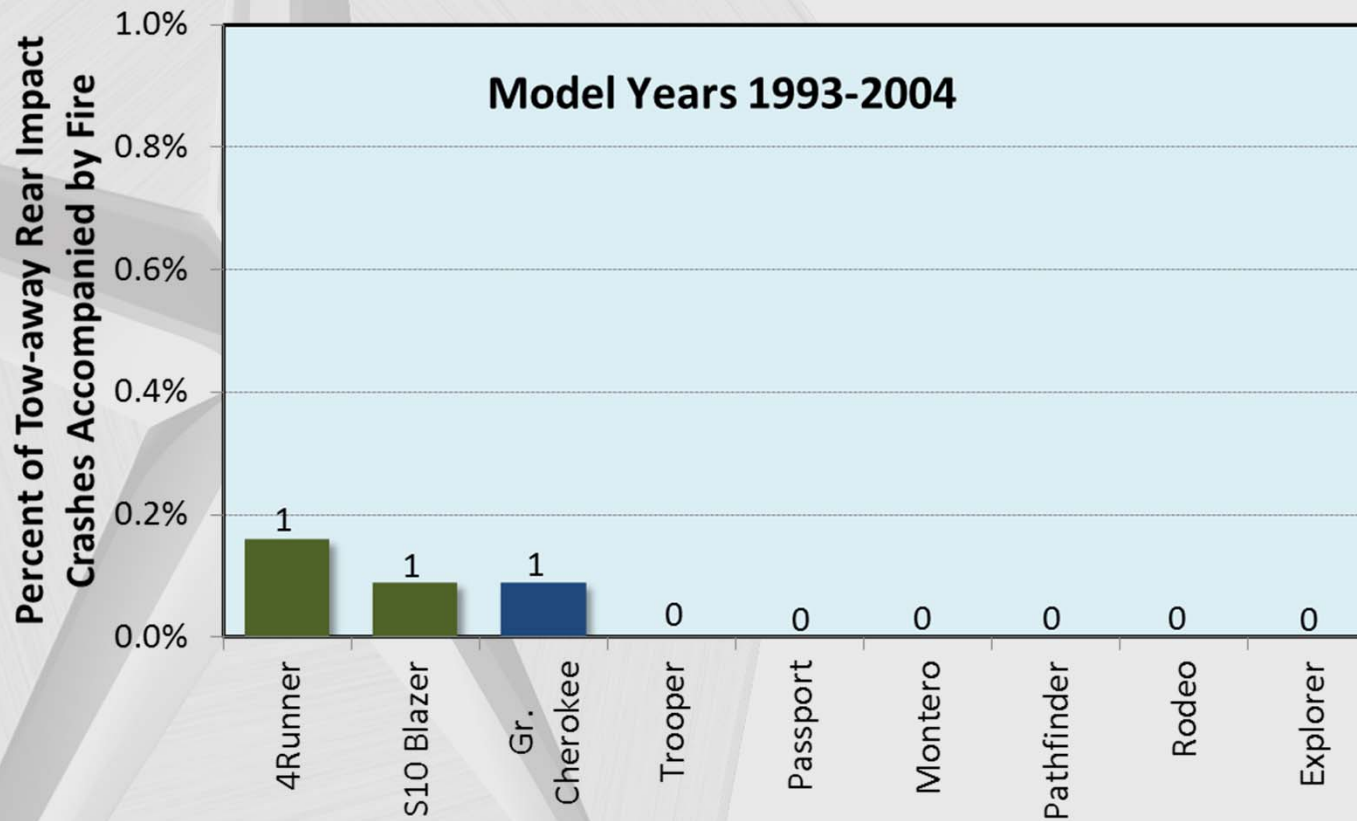


The 1993-2004 Jeep Grand Cherokee vehicles are no more likely to experience a fire in a rear impact crash than the peer vehicles

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State Crash Data Analysis - Florida

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The 1993-2004 Jeep Grand Cherokee vehicles are no more likely to experience a fire in a rear impact crash than the peer vehicles

Florida State data from 2002-2008. Includes crashes where initial impact to SUV was to the rear, and SUV required towing post-collision.

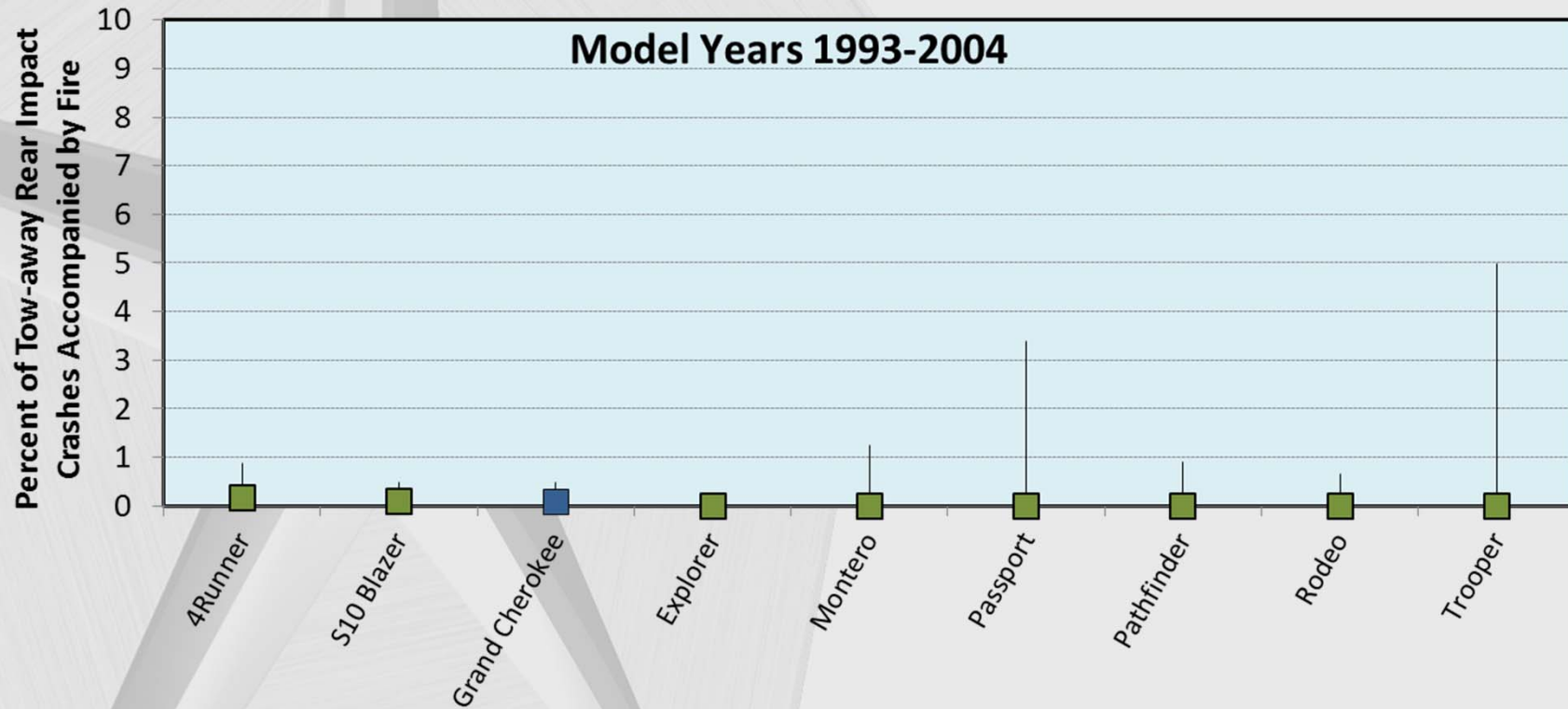
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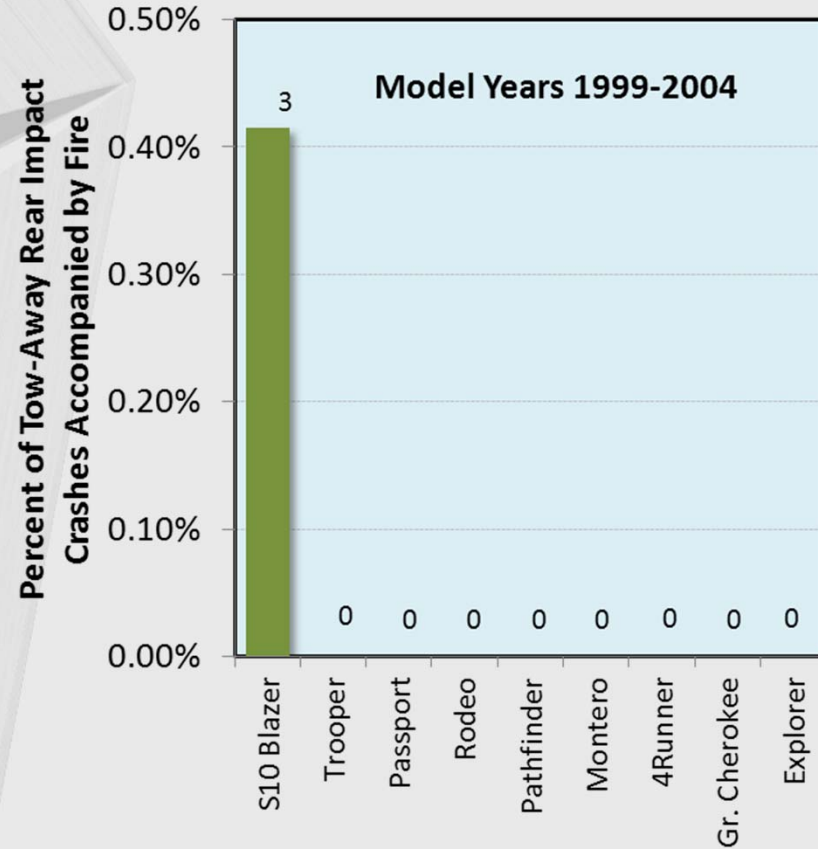
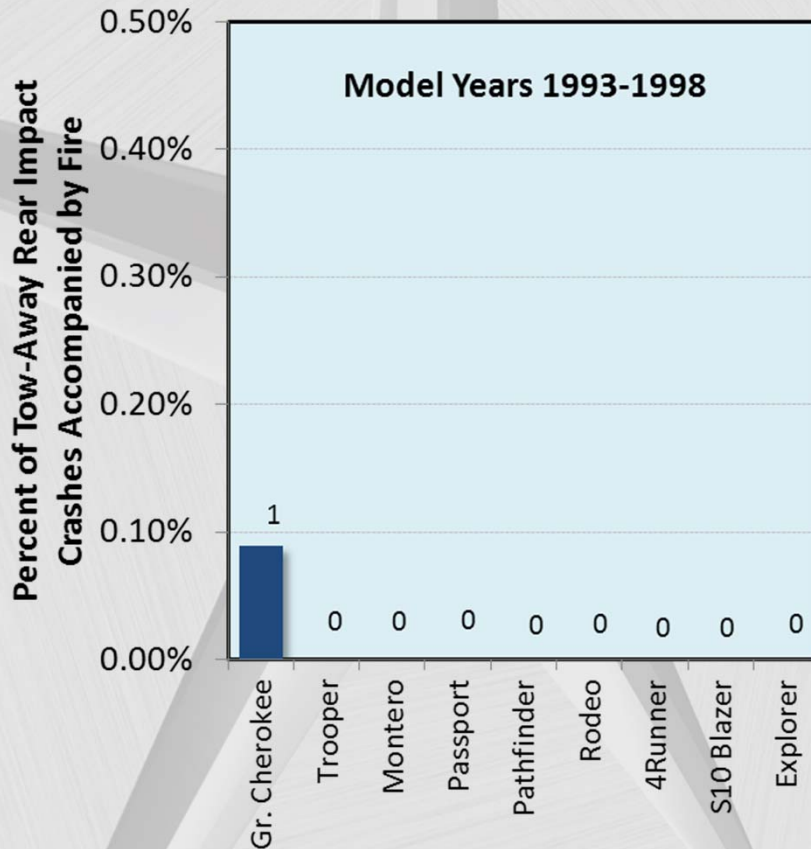


The 1993-2004 Jeep Grand Cherokee vehicles are no more likely to experience a fire in a rear impact crash than the peer vehicles

Florida state data from 2002-2008. Includes crashes where initial impact to SUV was to the rear, and SUV required towing post-collision. Explorer includes Mountaineer and Navajo. Montero includes Montero Sport. S10 Blazer includes T10 Blazer, Trailblazer, Jimmy, Envoy and Bravada. Squares are the calculated percentage, and the lines are the 95% confidence intervals about the percentages. Grand Cherokee fire is crash #72772419, coded as fire in FARS, but not in Florida.

State Crash Data Analysis – North Carolina

North Carolina State crash data analysis included over 7,700 rear impact events severe enough to require a tow-away

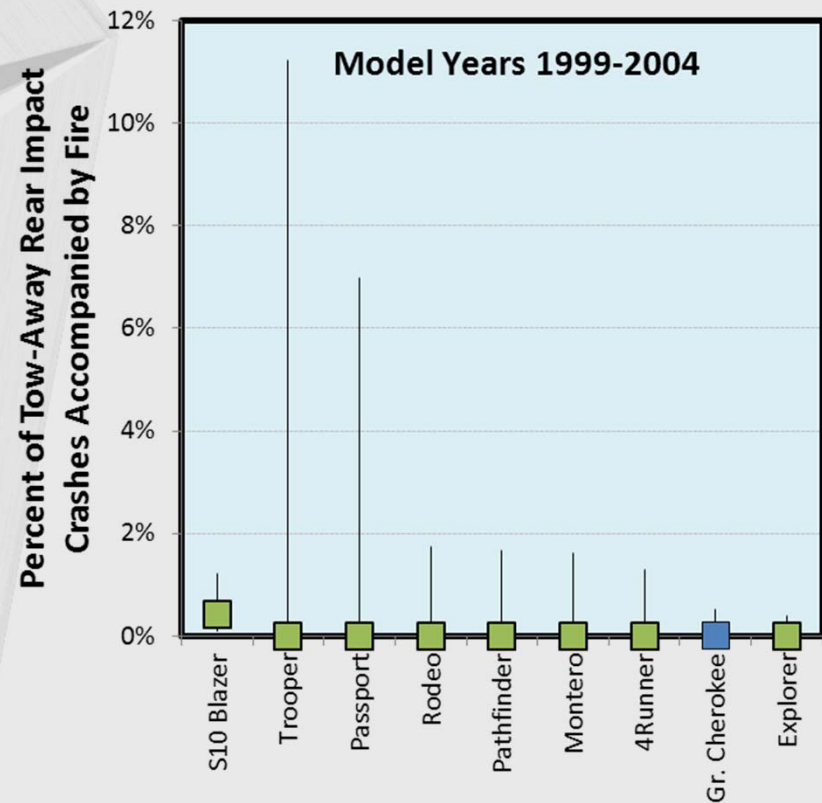
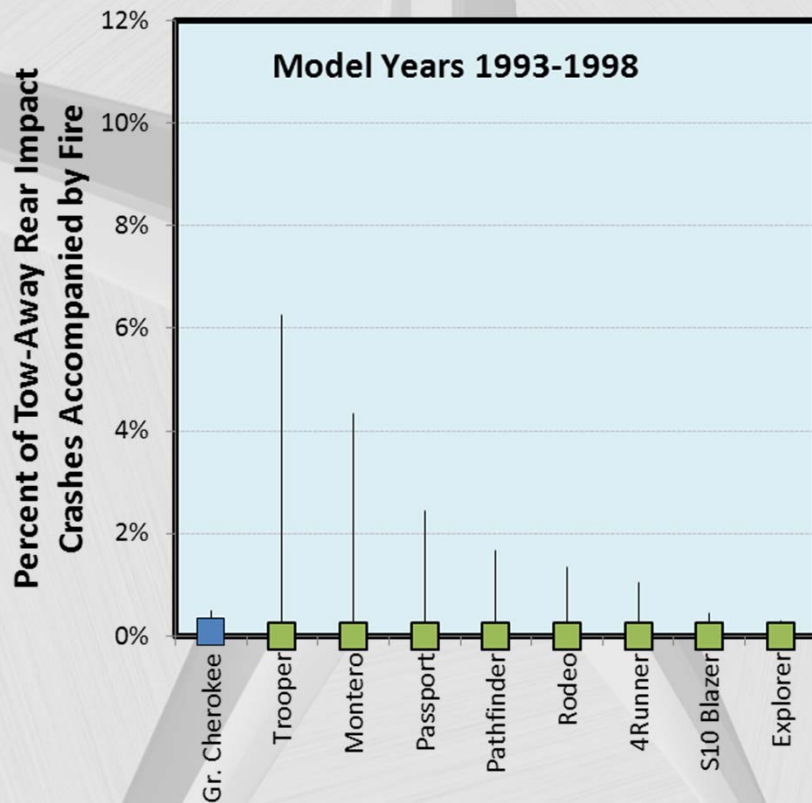


The 1993-2004 Jeep Grand Cherokee vehicles are no more likely to experience a fire in a rear impact crash than the peer vehicles

North Carolina State data from 2000-2008. Includes crashes where any impact to the SUV was to the rear and the vehicle was not coded as driven away. Explorer includes Mountaineer and Navajo. Montero includes Montero Sport. S10 Blazer includes T10 Blazer, Trailblazer, Jimmy, Envoy and Bravada. Numbers above bars are counts of fire-involved rear impact crashes.

State Crash Data Analysis – North Carolina

North Carolina State crash data analysis included over 7,700 rear impact events severe enough to require a tow-away

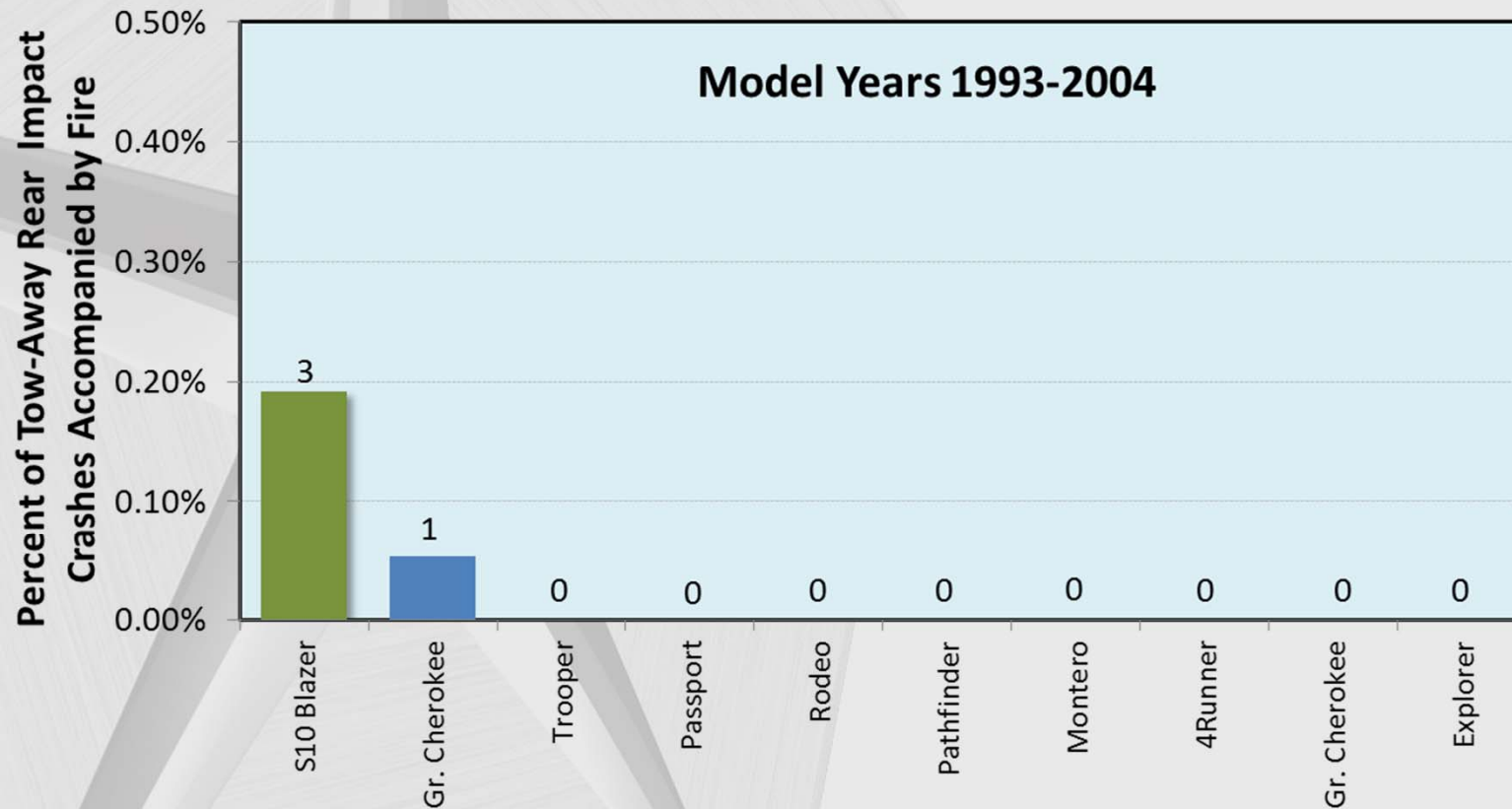


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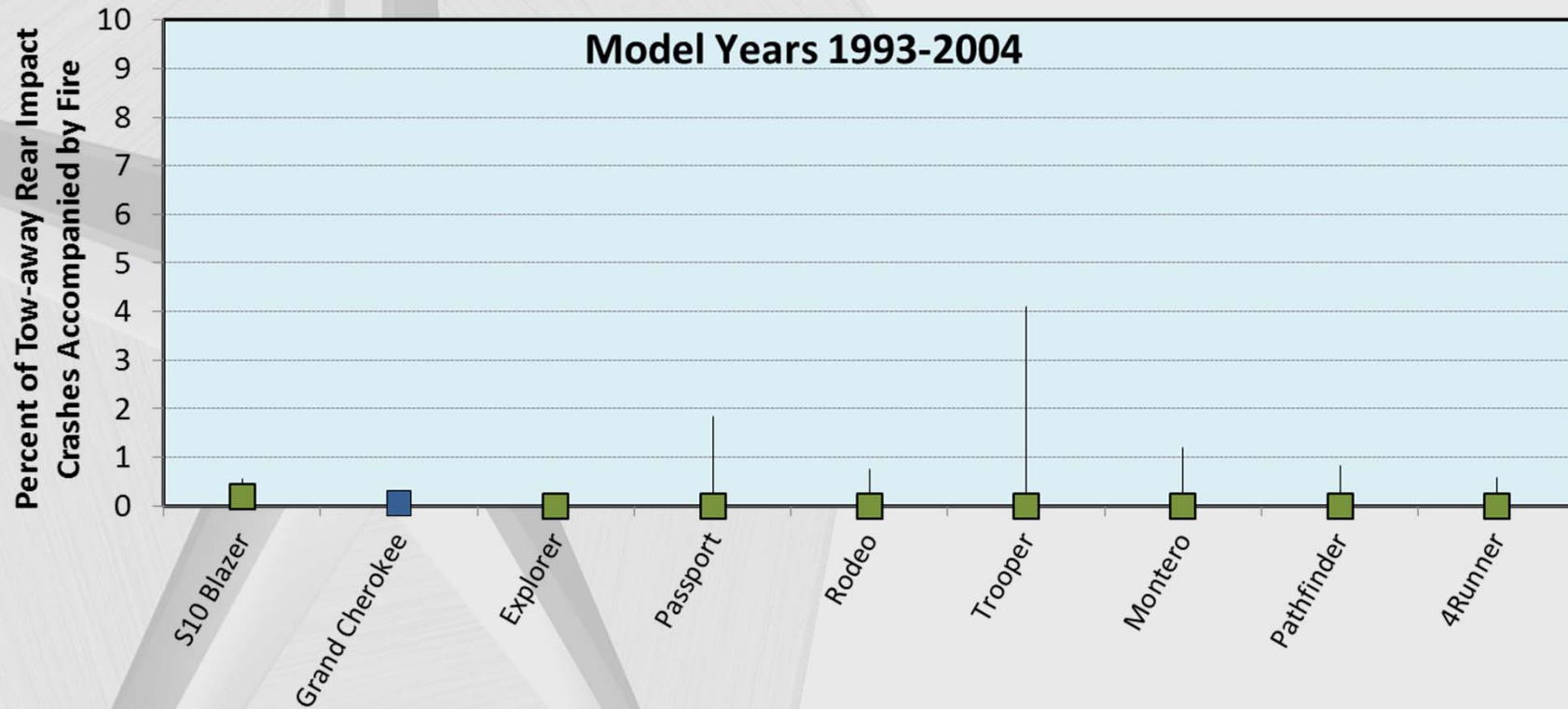


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State Crash Data Analysis Summary:

Key Takeaways:

- **As with the FARS data analysis, the state crash data analyses confirms that:**
 1. Rear impact events that result in fires are extremely rare for both the subject and peer vehicles; and
 2. That the 1993-2004 Jeep Grand Cherokee vehicles are no more likely to experience fire in a rear impact collision than the peer vehicles.

Vehicle Family	Number of Rear Impact Tow-Away Impacts	Number Resulting in Fire	Percentage Resulting in Fire
Chevy Blazer	5216	17	0.33%
Ford Explorer	5927	16	0.27%
Toyota 4Runner	1624	4	0.25%
Jeep Grand Cherokee	4752	9	0.19%

Notes: Includes summed crash data from Illinois, Florida, and North Carolina databases



Summary of Chrysler's PE10-031 Assessment

- In connection with this investigation, Chrysler Group studied publicly available data including NHTSA's EWR and FARS data as well as 3 state databases that enabled the assessment to also include less severe events rather than exclusively those that involved a fatality. It is apparent from this study that:
 1. Rear impacts resulting in a fire are extremely rare;
 2. Rear impacts resulting in a fire occur no more often in the 1993 – 2004 Jeep Grand Cherokee vehicles than in peer vehicles; and
 3. The 1993 – 2004 Jeep Grand Cherokee vehicles are at no greater risk of fire in rear end collisions than peer vehicles.
- Chrysler Group has concluded that the 1993-2004 Jeep Grand Cherokee vehicles are neither defective nor do their fuel systems pose an unreasonable risk to motor vehicle safety in rear impact collisions. Chrysler Group believes the investigation should be closed.



Analysis of Petition #2

Jeep

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THANK YOU!



Back Up Information

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Michigan Crash FARS # 260239

