
CENTER FOR AUTO SAFETY

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August 27, 2014

The Honorable David J. Friedman
Acting Administrator
National Highway Traffic Safety Administration (NHTSA)
1200 New Jersey Avenue SE, West Building
Washington, D.C. 20590

Dear Administrator Friedman:

The Center for Auto Safety (CAS) [filed a petition for defect investigation on August 21](#) regarding Chrysler Totally Integrated Power Modules (TIPM) failures. We write to you today in order to supplement our petition with information taken from NHTSA's Early Warning Reporting (EWR) database.

CAS has reviewed a number of complaints from both the CAS and NHTSA complaint databases. These complaints implicate the Chrysler TIPM in vehicle stalling, airbag non-deployment, random horn, headlight, taillight, power window, door lock, instrument panel and windshield wiper activity, failure of fuel pump shutoff resulting in unintended acceleration, and fires. Since the TIPM functions as the central gateway for all vehicle electronics, there are multiple EWR component codes that could point to the defect. These codes include airbags, electrical system, engine and engine cooling, exterior lighting, fire related, powertrain, service brake, speed control, and unknown.

[Attachment A](#) contains EWR information on all fatal crashes involving the components associated with TIPM failure. There are 24 such crashes involving 28 deaths that the agency must consider in reviewing our petition, at least twelve of which have been the subject of DI requests. There are also a large number of injury crashes reported to EWR that involve these components. Which of these crashes are related to TIPM failure is a matter that can only be known after an evaluation of each crash.

As [CAS has previously highlighted](#) in relation to GM ignition switch failures, the summary information provided in manufacturer EWR reporting is so general as to be functionally useless when evaluating a complex defect involving multiple vehicle components. There is simply no way for an analyst reviewing EWR reports to determine whether or not an individual EWR report relates to a defect under investigation. Until NHTSA expands EWR component coding, the agency has to obtain and look at the underlying documents for each and every crash reported to EWR when evaluating defect trends.

In the immediate case involving Chrysler TIPM failures, CAS requests that NHTSA place all DI records related to these crashes in the public file for the defect petition. Additionally, the agency must follow up on all EWR reports concerning death or injury in the subject vehicles in the Center's defect petition, particularly those involving any component likely to be associated with TIPM failure. Given the ability of manufacturers to select non-relevant components under EWR [as Toyota did in delaying the tie-rod recall 05V-389](#) that led to [a \\$16 million fine](#), the Center calls on NHTSA to obtain the underlying documents on all Chrysler EWR death reports on the subject vehicles for crashes related to TIPM failure and place them in the defect petition public file.

Sincerely,

A handwritten signature in black ink, appearing to read 'm/b' followed by a stylized flourish.

Michael Brooks
Staff Attorney