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10 *Attorneys for Intervenor Center for Auto Safety*

11 **UNITED STATES DISTRICT COURT**  
12 **FOR THE CENTRAL DISTRICT OF CALIFORNIA**

13 PETER VELASCO, *et al.*,

14 Plaintiffs,

15 v.

16 CHRYSLER GROUP LLC,

17 Defendant.

18 Case No. 2:13-cv-08080-DDP

19  
20  
21 **DECLARATION OF CLARENCE DITLOW IN SUPPORT OF MOTION**  
22 **TO INTERVENE OF THE CENTER FOR AUTO SAFETY**

23 I, CLARENCE DITLOW, hereby certify as follows:  
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1  
2 1. I am the Executive Director of the Center for Auto Safety (“the Center”) and  
3 have been since 1976. I have a B.S. degree in Chemical Engineering from  
4 Lehigh University (1965), a J.D. degree from the Georgetown University  
5 Law Center (1970), and an LL.M. degree from the Harvard Law School  
6 (1971). I am the author of numerous consumer publications including the  
7 “Lemon Book” (1980 and 1990 editions), which I co-authored with Ralph  
8 Nader, and “Little Secrets of the Auto Industry” (1994). I am the chief  
9 editor of “Automobile Design Liability,” a six-volume work published by  
10 West and supplemented annually, on state and federal regulation of the  
11 automobile industry, including all actions by the National Highway Traffic  
12 Safety Administration (NHTSA) and the Federal Trade Commission that  
13 affect motor vehicles. “Automobile Design Liability” summarizes every  
14 safety recall done under the National Traffic and Motor Vehicle Safety Act  
15 of 1966 and arranges them by manufacturer and component. It also lists  
16 every defect investigation conducted by NHTSA and arranges them by  
17 manufacturer and component.  
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24 2. The Center is a non-profit public interest organization founded by consumer  
25 advocate Ralph Nader and Consumers Union in 1970. The Center has over  
26 15,000 members nationwide. The Center is dedicated to promoting  
27 automobile and highway safety, ensuring that defective and unsafe  
28

1 automobiles and automobile equipment are removed from the road, and  
2 helping make roads safer for motor vehicles through safer designs and traffic  
3 controls. The Center provides information on safety hazards to alert the  
4 public, testifies before Congress, and petitions federal agencies for remedial  
5 action on safety issues.  
6  
7

8 3. The Center and I have a distinguished track record of petitioning NHTSA to  
9 recall motor vehicles and items of motor vehicle equipment that are  
10 defective, fail to meet an applicable Motor Vehicle Safety Standard, or are  
11 otherwise unsafe. The Center and I have played a substantial role in the four  
12 largest recalls ever – 7 million Chevrolets for defective engine mounts in  
13 1971, 15 million Firestone 500 tires for tread separation in 1978, 3.7 million  
14 Evenflo infant and child seats with defective latch buckles in 1990, and 7.5  
15 million Ford, Lincoln and Mercury vehicles for defective ignition switches  
16 in 1996. The Center was also the first to seek – and eventually obtained –  
17 the recall of 1.4 million Ford Pintos and Bobcats for gas tanks that ruptured  
18 and exploded in crashes. In October 2009, the Center filed a defect petition  
19 with NHTSA to investigate fuel tanks placed behind the rear axle in 1993-04  
20 Jeep Grand Cherokees that could rupture in rear impacts. That petition led  
21 to recall 13V-252 of the 1993-98 Jeep Grand Cherokee and 2002-07 Jeep  
22 Liberty on June 18, 2013.  
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- 1 4. The Center works to reduce the public's risk of injury on the highways by,  
2 among other things, educating the public about safety issues and serving as a  
3 clearinghouse for consumers who want to obtain information on vehicle and  
4 highway safety issues and members of the media who want to report on  
5 these issues. Each year, the Center receives more than 40,000 letters,  
6 telephone calls, and posts on its website from consumers and the media  
7 relating to these issues. The Center posts detailed information on safety  
8 investigations and recalls, as well as manufacturer documents on service  
9 campaigns and Technical Service Bulletins that enable consumers to get  
10 their cars repaired. The Center also posts research reports, technical  
11 documents, Congressional hearings and vehicle crash test results and ratings.  
12  
13 5. The Center first learned of problems with the Totally Integrated Power  
14 Module (TIPM) through complaints submitted on its website. The Center  
15 has received over 160 complaints from consumers on vehicles with TIPM  
16 failures. The Center confirmed the problem by looking at complaints filed  
17 with NHTSA and websites such as CarComplaints.com. The Center also  
18 found that Chrysler had conducted small safety recalls of TIPMs.  
19  
20 6. On August 21, 2014, the Center filed a Petition for Defect Investigation with  
21 NHTSA, requesting that the agency investigate Chrysler SUVs, trucks and  
22 vans with TIPMs from model years 2007-2014. The petition is attached as  
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1 Exhibit A to this declaration. The Center also issued an Action Alert about  
2 the defect, linked from the home page of the Center's web site, in order to  
3 make consumers who visit the web site aware of the problem. That Action  
4 Alert is attached to this declaration as Exhibit B.  
5

6  
7 7. On September 25, 2014 in response to the Center's petition, NHTSA issued  
8 an opening resume on an estimated 4.9 million Chrysler vehicles with a  
9 TIPM7 module. The resume is attached to this declaration as Exhibit C. If  
10 NHTSA grants the Center's petition, it must open a defect investigation,  
11 which is the first step toward instituting a recall.  
12

13  
14 8. Under the National Traffic and Motor Vehicle Safety Act, 49 U.S.C. §  
15 30162(d), NHTSA must grant or deny the Center's petition within 120 days  
16 of filing – that is, by December 19, 2014. During this time, the Center is  
17 continuing to gather and submit information to NHTSA with the goal of  
18 convincing the agency to grant the petition and open a defect investigation.  
19 The Center has already submitted more than 160 complaints from  
20 consumers.  
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22  
23 9. The Center learned about the Velasco lawsuit by searching the Internet for  
24 class actions on TIPMs. After finding the case, the Center contacted class  
25 counsel to obtain a copy of the complaint.  
26

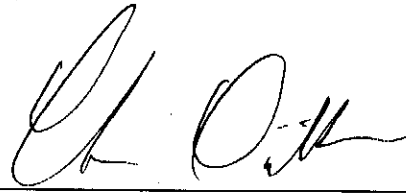
27  
28 10. The Center seeks to intervene into this matter for three reasons: First, it is

1 likely that the documents sealed in this proceeding will provide important  
2 information regarding the safety of the TIPM that the Center can submit to  
3 NHTSA in support of its petition. Second, if NHTSA grants the petition,  
4 access to documents sealed in this proceeding will help the agency  
5 determine whether the vehicles with the TIPM should be recalled for a  
6 safety defect. Finally, even if NHTSA does not grant the petition, access to  
7 the sealed documents will enable the Center to evaluate the safety of  
8 vehicles with the TIPM, educate the public on the issue, and, should there be  
9 hearings on the matter, better inform Congress.  
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15 I certify that the foregoing statements made by me are true. I am aware that if any  
16 of the foregoing statements made by me are willfully false, I am subject to  
17 punishment.  
18

19  
20 Dated:

Oct. 23, 2014



Clarence Ditlow

# **EXHIBIT A**

# CENTER FOR AUTO SAFETY

1825 CONNECTICUT AVENUE NW SUITE 330 WASHINGTON DC 20009-5708  
202-328-7700  www.autosafety.org

August 21, 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

## **PETITION FOR DEFECT INVESTIGATION**

Dear Administrator Friedman:

The Center for Auto Safety (CAS) hereby petitions the National Highway Traffic Safety Administration (NHTSA) to initiate a safety defect investigation into failures associated with the Totally Integrated Power Module (TIPM) installed in Chrysler SUV's, trucks, and vans beginning in the 2007 model year. Affected vehicle models include the Chrysler Grand Voyager, Chrysler Town & Country, Dodge Durango, Dodge Journey, Dodge Grand Caravan, Dodge Ram Cargo Van, Dodge Nitro, Dodge Ram 1500, Dodge Ram 2500, Dodge Ram 3500, Dodge Ram 4400/5500, Jeep Grand Cherokee, Jeep Liberty, and Jeep Wrangler.

Chrysler TIPM failures result in a variety of safety-related issues in multiple vehicle components, many of which have the potential for destructive results. The TIPM consists of a computer, electric relays, and fuses, and is responsible for distributing power throughout the entire vehicle. Not only do Chrysler's faulty TIPMs result in vehicle stalling, they have also been implicated in airbag non-deployment, random horn, headlight, taillight, door lock, instrument panel and windshield wiper activity, power windows going up and down on their own, failure of fuel pump shutoff resulting in unintended acceleration, and fires. CAS has received at least 70 complaints related to the Chrysler TIPM<sup>1</sup>, and there have been hundreds if not thousands of TIPM-related complaints filed with NHTSA. Complaints on Chrysler TIPMs are also flooding into other vehicle complaint websites. CarComplaints.com notes that TIPM complaints on 2011 Jeep Grand Cherokees are the number one most frequent complaint on their website, with 2011 Dodge Durango TIPM complaints coming in a close second.

Chrysler owners seeking relief of these conditions are currently being forced to pay for TIPM replacement, and wait weeks or months for the part to become available, due to incredible demand. In the interim, these owners remain at the mercy of a defect which many have likened to the vehicle being possessed and uncontrollable. A look at consumer complaints filed with CAS suggests a better name for the TIPM - Totally Inept Power Module:

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<sup>1</sup> [Attachment A](#) is a list of all TIPM-related complaints received by the Center for Auto Safety. Individual complaints may be retrieved by clicking the "View" link in each summary.



"The TIPM appears to be failing, the jeep has a mind of its own, wipers, washers and horn come on whenever they want, whether the key is in or not..power windows work when they want, dash lights go crazy when its having one of its seizures...dealer says they can change the TIPM for \$1000 but it may not solve the issue and their diagnostic did not reveal any issues with the TIPM." Dean Wittenberg, 2008 Jeep Wrangler

"Horn blares, wipers start running while off, won't shift out of 1st gear, A/C blower stops working, engine cooling fan stops running, brake, reverse, and park lights flickering, locks lock and unlock on own fob won't work on them, power steering goes out, gauges go nuts, ruined my battery the last time it happened, happens regularly about every 2 to 3 weeks have found it is faulty TIPM that is always on backorder or has been since 10/2012 when I first had the problem occur" Kristi Dodd, 2008 Dodge Grand Caravan

"This is my second episode with my Nitro. When I was leaving work and getting ready to put my key in to unlock my door, the horn starting blowing, wipers, front and back, came on including the water spraying out, doors locking and unlocking, gate open and closing, lights going on and off. I then opened the door and started the engine and it continued to do the same thing. When I turned it off it was still doing the same. It was doing this for about 15-20 mins. until I had someone take off the battery cable. I had to get a tow truck, rent a car for 2 days. The shop put my truck on the computer and tested everything. From the computer it was all fine. They put a new battery in and made a new key phoebe. Everything has been fine until not even 2 wks later. I was at a red light with a car in front of me and the horn went off and wipers came on for about 2mins. now I have to take it back. The first time this happened I was driving at 55 mph was almost in a accident and had to pull off the road." Louise Robinson, 2008 Dodge Nitro

"Radio system & lights, gauge lights, and turn signals cut off while in the middle of driving. AC/HEAT would not work. Vehicle had a hard time turning over to start. We were told it was because our battery was low. we replaced battery and all systems still periodically fail. Vehicle still fails to start sometimes." Katherine Romano, 2010 Dodge Journey

Additionally, a survey of complaints related to Chrysler TIPMs suggest that a stall/no-start condition is most reported outcome of TIPM failure, leaving drivers without power in traffic and stranded for unknown periods of time before the vehicle regains the capacity to be started. Even in the absence of bizarre behavior attributed to faulty TIPMs in these vehicles, the presence of stalling should itself be sufficient to support a recall. Over 300 safety recalls for stalling have occurred under the Safety Act.<sup>2</sup>

In the 1970's, NHTSA litigated a series of defect cases in the federal courts that established loss of vehicle power on the road as a safety defect. In U.S. v. General Motors Corp., 413 F.Supp. 933 (D.D.C. 1976), Judge June Green ruled:

Even if this "defect" were not per se related to "motor vehicle safety", the uncontested facts of this case establish that fuel inlet plug failure results in several obvious and undeniable safety hazards. First, once the plug fails, the car "will stop running". The driver must then either

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<sup>2</sup> [Attachment B](#) is a compendium of 329 safety recalls from 1966 through 2013 for safety defects ranging from ignition switches to ignition modules to fuel pumps and other components that cause vehicle stalling. Excluded from this list are recalls due to catastrophic engine failure.

abandon his vehicle in the midst of oncoming traffic or, if he can, pull over to the side of the road. Both situations are dangerous.

In U.S. v. Ford Motor Co., 453 F. Supp. 1240 (D.D.C 1978), Judge John L. Smith, Jr. reached a similar conclusion in finding vehicles stopping on the road due to windshield wiper failure was a safety defect.

At least two prior safety recalls have dealt with safety defects in the subject Chrysler TIPMs. In July of 2007, Chrysler filed a Part 573 for recall 07V-291, which addressed stalling problems in 2007 Jeep Wrangler and Dodge Nitro vehicles. In that recall, the TIPM was programmed with software that allowed engines to stall due to a TIPM reset timing error. In July of 2013, Chrysler filed a Part 573 for recall 13V-282, which sought to address airbag non-deployment in a number of Chrysler vehicles including the 2012 Jeep Liberty. TIPM reprogramming was required in a portion of the affected vehicle population.

Unfortunately, neither of these recalls was sufficient to address the TIPM problem throughout Chrysler's fleet, instead focusing on a highly limited set of vehicles and circumstances. The actual TIPM problem is far broader, as evidenced by the [recent filing of a class action lawsuit](#) in US District Court, Velasco et al vs. Chrysler LLC, incorporated herein by reference, covering fifteen different Chrysler models over a number of model years. Given the number and range of complaints related to Chrysler TIPMs, it is time for NHTSA to formally investigate TIPM failures across the board in 2007 and later models.

Sincerely,



Michael Brooks  
Staff Attorney

# **EXHIBIT B**



The Center for  
Auto Safety

## CAS Calls for NHTSA Investigation of Chrysler Totally Integrated Power Modules (TIPM)

NEWS

CENTER FOR AUTO SAFETY

1825 Connecticut Avenue, NW Suite 330 Washington, DC 20009-5708

August 21, 2014  
(202) 328-7700

### **CAS SEEKS NHTSA DEFECT INVESTIGATION OF MILLIONS OF 2007-14 CHRYSLER SUVs, TRUCKS & VANS WITH TOTALLY INTEGRATED POWER MODULES (TIPMs)**

The Center for Auto Safety today filed a petition for a defect investigation with the National Highway Traffic Safety Administration (NHTSA), requesting the agency open a formal investigation into safety-related issues associated with Chrysler's Totally Integrated Power Module (TIPM). Chrysler began installing the TIPM in a wide range of vehicles beginning in the 2007 model year that number in the millions. Thousands of owners have reported a wide range of serious safety failures related to the TIPM to CAS, NHTSA and complain forums such as carcomplaints.com. Consumers report frequent vehicle shutdowns with no restart capability on the highway, airbag non-deployment, random horn, headlight, taillight, door lock, instrument panel and windshield wiper activity, power windows going up and down on their own, failure of fuel pump shutoff resulting in unintended acceleration, and fires.

CAS Executive Director Clarence Ditlow said:

- **Chrysler's TIPM is a computer run amuck - owners report that their vehicles act as if possessed and leave them in dangerous situations - stalled vehicles stranded without warning on the highway, fuel pumps that won't shut off, windows that open and shut, airbags that won't deploy. The TIPM is in millions of 2007-14 Chrysler vehicles and fails at such high frequency that Chrysler has run out of replacement parts. Consumers are faced with a terrible dilemma - park the vehicle until parts are available or ride at risk of being in deadly crash. In a defect petition filed today, CAS seeks a recall of all Chrysler vehicles with defective TIPMs and replacement with a redesigned module that provides safe and reliable vehicle control.**
- **This is yet another electronic defect that shows how inadequate NHTSA's resources are to regulate today's modern automobile that is little more than a computer on wheels. NHTSA has no electronic research laboratory or any significant electronic staff capability. When NHTSA investigated unintended acceleration that involved defective computers, NHTSA went to Chrysler to run EMI tests. NHTSA even rents space from Honda for its Vehicle Research Test Center to conduct ongoing defect investigation testing and standards research.**
- **Chrysler conducted two small recalls on vehicles with defective TIPMs**

**but this was just the tip of the iceberg. All 2007-14 vehicles with TIPMs must be recalled to ensure Chrysler owners can ride without risk of stalling on the road, having the airbag fail to deploy in a crash, having the fuel pump continue to run and causing a fire or unintended acceleration.**

# # #

## CAS ACTIONS

[DP14-004 Opening Resume \(/sites/default/files/imce\\_staff\\_uploads/DP14-004%20Opening%20Resume.PDF\)](/sites/default/files/imce_staff_uploads/DP14-004%20Opening%20Resume.PDF) - 9/25/14

[Click here to view the Petition for Defect Investigation](http://www.autosafety.org/sites/default/files/imce_staff_uploads/Chrysler%20TIPM%20Defect%20Petition.pdf)

([http://www.autosafety.org/sites/default/files/imce\\_staff\\_uploads/Chrysler%20TIPM%20Defect%20Petition.pdf](http://www.autosafety.org/sites/default/files/imce_staff_uploads/Chrysler%20TIPM%20Defect%20Petition.pdf)) - 8/21/14

[EWR Supplement to Defect Petition](/sites/default/files/imce_staff_uploads/Chrysler%20TIPM%20Supplement%20to%20Defect%20Petition.pdf)

([/sites/default/files/imce\\_staff\\_uploads/Chrysler%20TIPM%20Supplement%20to%20Defect%20Petition.pdf](/sites/default/files/imce_staff_uploads/Chrysler%20TIPM%20Supplement%20to%20Defect%20Petition.pdf)) - 8/27/14

[CAS Complaint Supplement to Defect Petition](/sites/default/files/imce_staff_uploads/Chrysler%20TIPM%20Complaint%20Supplement%20to%20Defect%20Petition%20Full.pdf)

([/sites/default/files/imce\\_staff\\_uploads/Chrysler%20TIPM%20Complaint%20Supplement%20to%20Defect%20Petition%20Full.pdf](/sites/default/files/imce_staff_uploads/Chrysler%20TIPM%20Complaint%20Supplement%20to%20Defect%20Petition%20Full.pdf)) - 9/8/14

[CAS Complaint Supplement #2](/sites/default/files/imce_staff_uploads/Chrysler%20TIPM%20Second%20Complaint%20Supplement%20to%20Defect%20Petition%20Full%2009-30-14.pdf)

([/sites/default/files/imce\\_staff\\_uploads/Chrysler%20TIPM%20Second%20Complaint%20Supplement%20to%20Defect%20Petition%20Full%2009-30-14.pdf](/sites/default/files/imce_staff_uploads/Chrysler%20TIPM%20Second%20Complaint%20Supplement%20to%20Defect%20Petition%20Full%2009-30-14.pdf)) - 9/30/14

## NEWS

[Chrysler Recalling Nearly 189,000 SUVs \(http://hosted.ap.org/dynamic/stories/U/US\\_CHRYSLER\\_RECALL?SITE=AP&SECTION=HOME&TEMPLATE=DEFAULT\)](http://hosted.ap.org/dynamic/stories/U/US_CHRYSLER_RECALL?SITE=AP&SECTION=HOME&TEMPLATE=DEFAULT) - 9/20/14

[Auto group says nerve center defect behind Chrysler problems \(http://www.cbsnews.com/news/auto-group-says-nerve-center-defect-behind-chrysler-problems/\)](http://www.cbsnews.com/news/auto-group-says-nerve-center-defect-behind-chrysler-problems/) - 8/27/14

[Safety group demands answers about auto defect \(http://www.fox23.com/news/news/transportation/safety-group-demands-answers-about-auto-defect/nq9hT/\)](http://www.fox23.com/news/news/transportation/safety-group-demands-answers-about-auto-defect/nq9hT/) - 8/27/14

[Chrysler Owners Sound Off on a Power Defect \(http://www.nytimes.com/2014/08/23/automobiles/chrysler-owners-sound-off-on-defective-power-module.html\)](http://www.nytimes.com/2014/08/23/automobiles/chrysler-owners-sound-off-on-defective-power-module.html) - 8/22/14

## CLASS ACTION

[Chrysler TIPM Class Action Information \(http://www.autosafety.org/chrysler-totally-integrated-power-module-class-action\)](http://www.autosafety.org/chrysler-totally-integrated-power-module-class-action)

[Order Issued in TIPM Class Action \(/sites/default/files/imce\\_staff\\_uploads/TIPM%20Order.pdf\)](/sites/default/files/imce_staff_uploads/TIPM%20Order.pdf) - 8/22/14

## DOCUMENTS

[Stalling Recalls \(http://www.autosafety.org/sites/default/files/imce\\_staff\\_uploads/Stalling%20Recalls%20Detailed.pdf\)](http://www.autosafety.org/sites/default/files/imce_staff_uploads/Stalling%20Recalls%20Detailed.pdf)

[CAS TIPM Complaints](http://www.autosafety.org/sites/default/files/imce_staff_uploads/TIPM%20Complaint%20without%20email.pdf)

([http://www.autosafety.org/sites/default/files/imce\\_staff\\_uploads/TIPM%20Complaint%20without%20email.pdf](http://www.autosafety.org/sites/default/files/imce_staff_uploads/TIPM%20Complaint%20without%20email.pdf))

[2007 Jeep Wrangler, Dodge Nitro TIPM recall - 07V-291 \(http://www-](http://www-2007-Jeep-Wrangler,-Dodge-Nitro-TIPM-recall-07V-291)

# 2238

[odi.nhtsa.dot.gov/acms/cs/jaxrs/download/doc/ACM7090876/RCDNN-07V291-2882.pdf](http://odi.nhtsa.dot.gov/acms/cs/jaxrs/download/doc/ACM7090876/RCDNN-07V291-2882.pdf)

[2012 Jeep Liberty TIPM recall - 13V-282 \(http://www-odi.nhtsa.dot.gov/acms/cs/jaxrs/download/doc/UCM441123/RCDNN-13V282-6322.pdf\)](http://www-odi.nhtsa.dot.gov/acms/cs/jaxrs/download/doc/UCM441123/RCDNN-13V282-6322.pdf)

[Chrysler EWR Reports on TIPM-Related Components \(/sites/default/files/imce\\_staff\\_uploads/Chrysler%20EWR%20Deaths%20Possible%20TIPM%20Failure.pdf\)](http://sites/default/files/imce_staff_uploads/Chrysler%20EWR%20Deaths%20Possible%20TIPM%20Failure.pdf)

# EXHIBIT C



U.S. Department of Transportation  
**National Highway Traffic Safety Administration**

# ODI RESUME

OFFICE OF DEFECTS INVESTIGATION



Authentic US Government Information  
 National Highway Traffic Safety Administration  
 uses a digital certificate to ensure the content has remained unchanged

**Investigation:** DP 14-004  
**Prompted by:** Defect petition  
**Date Opened:** 09/25/2014  
**Investigator:** Kareem Habib **Reviewer:** Jeff Quandt  
**Approver:** Frank Borris  
**Subject:** Totally Integrated Power Module Failure

## MANUFACTURER & PRODUCT INFORMATION

**Manufacturer:** Chrysler Group LLC  
**Products:** 2007-2014 Chrysler/Dodge/Jeep SUV's, trucks & vans w/TIPM7  
**Population:** 4,900,000 (Estimated)  
**Problem Description:** The petitioner alleges Totally Integrated Power Module (TIPM) failures have resulted in engine stall, airbag non-deployment, failure of fuel pump shutoff resulting in unintended acceleration, fires and other symptoms.

## FAILURE REPORT SUMMARY

	ODI	Manufacturer	Total
<b>Complaints:</b>	1	TBD	TBD
<b>Crashes/Fires:</b>	0	TBD	TBD
<b>Injury Incidents:</b>	0	TBD	TBD
<b>Number of Injuries:</b>	0	TBD	TBD
<b>Fatality Incidents:</b>	0	TBD	TBD
<b>Number of Fatalities:</b>	0	TBD	TBD
<b>Other*:</b>	63	TBD	TBD

\*Description of Other: Complaints submitted with the petition that involve vehicles equipped with TIPM7 modules.

## ACTION / SUMMARY INFORMATION

**Action:** The petition will be evaluated for a grant or deny decision.

### Summary:

In a letter dated August 21, 2014, the Center for Auto Safety (CAS) petitioned the National Highway Traffic Safety Administration (NHTSA) to initiate a defect investigation into failures associated with the Totally Integrated Power Module (TIPM) installed in Chrysler SUVs, trucks, and vans beginning in the 2007 model year. The CAS alleges that TIPM failures have resulted in incidents of engine stall; airbag non-deployment; random horn, headlight, taillight, door lock, instrument panel and windshield wiper activity; failure of fuel pump shutoff resulting in unintended acceleration; and fires. The petition includes a list of 70 complaints received by CAS that are allegedly related to Chrysler TIPM failures. The petition references a class action lawsuit regarding TIPM7 module failure and 63 of the CAS complaints relate to vehicles equipped with TIPM7 body control modules (1 complaint involves a vehicle equipped with a TIPM6 module and 6 complaints involve vehicles that were not equipped with TIPM modules). This defect petition review will focus on vehicles equipped with TIPM7 modules.

Preliminary analysis of the 63 CAS complaints related to TIPM7 equipped vehicles identified 51 reports alleging incidents of engine stall (17) or no-start (34). Three complaints reported incidents of smoke (2) or fire (1). None of the reports provided alleged TIPM failures resulting in airbag non-deployment or unintended acceleration and none of the complaints alleged a crash. In a supplement to the petition, CAS identified 24 crashes from NHTSA's Early Warning Reporting (EWR) database that it believes may be related to TIPM failure and requested that NHTSA review these as part of its petition evaluation.



In a September 3, 2014 letter, Chrysler Group LLC notified NHTSA of a safety defect in the Totally Integrated Power Module-7 (TIPM 7) in approximately 188,723 MY 2011 Dodge Durango and Jeep Grand Cherokee vehicles equipped with 3.6L and 5.7L engines (Recall 14V-530). According to Chrysler, some Jeep Grand Cherokee and Dodge Durango vehicles may experience a failure in the fuel pump relay within the TIPM which can result in a no-start or stall condition. Thirty-six (36) of the complaints submitted with the petition involve MY 2011 Jeep Grand Cherokee and Dodge Durango vehicles equipped with 3.6L and 5.7L engines.

The petition will be evaluated for a grant or deny decision. A copy of the petition will be placed in the public file (NHTSA Ref. No. 10637920).