

August 18, 2015

Mr. Frank S. Borris II
Acting Associate Administrator, Enforcement
National Highway Traffic Safety Administration (NHTSA)
1200 New Jersey Avenue SE
Washington, DC 20590

Re: DP14-004 Chrysler TIPM-7 Defect Petition Denial

Dear Mr. Borris:

This responds to NHTSA's July 24, 2015 denial of the Center for Auto Safety's (CAS) August 21, 2014, petition for a defect investigation on Chrysler Totally Integrated Power Modules (TIPMs) introduced on 2007 trucks and SUVs. As shown by the attached Timeline, CAS and the attorneys in the *Velasco v Chrysler Group*¹ class action did what NHTSA could and should have done, but didn't do - i.e., force safety recalls of over a half million vehicles for defective TIPM-7 modules.

Even though the TIPM-7 went on national backorder in October 2013 with Chrysler SUVs stalling all over the country, NHTSA did nothing. Just one month later on November 11, a national class action was filed. NHTSA still did nothing. On April 11, 2014, Chrysler disclosed in [discovery in Velasco](#): "Engineering and Customer Satisfaction Team investigations of TIPM performance in the field began in April or May 2012." NHTSA never opened an investigation or indicated any knowledge of Chrysler's TIPM investigations, once again showing either how a manufacturer can pull the wool over NHTSA's eyes or NHTSA can ignore defect data. In contrast to NHTSA's inaction, attorneys in *Velasco* amended their complaint in view of Chrysler's discovery.

On August 21, 2014, CAS petitioned NHTSA to open a defect investigation into the TIPM installed in Chrysler SUV's, trucks, and vans beginning in the 2007 model year - i.e., the TIPM-7. While consumer reported a myriad of failures, CAS pointed out stalling was the most common problem:

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.

CAS also pointed out:

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.

Again, NHTSA did nothing despite its own complaint database showing a rampant safety defect.

¹ Case No. 2:13-cv-0808 (DCalCD, filed Nov. 11. 2013).

August 18, 2015

Page Two

On August 22, the [US District Court for the Central District of California denied Chrysler's motion](#) to dismiss *Velasco* noting that NHTSA safety complaints informed Chrysler of the TIPM defect::

Plaintiffs also allege that Chrysler learned of the defect through its monitoring of drivers' safety-related reports to the National Highway Traffic Safety Administration ("NHTSA"), which received complaints from drivers beginning in 2008 concerning electrical issues, including uncontrollable activity of the windshield wipers, horn, and alarm system, and the headlights and taillights not working. (Id. ¶ 38.) By the end of 2011, more than 100 drivers had filed reports with NHTSA about problems related to a defective TIPM. . . .

Plaintiff has identified the "who" (Chrysler); the "what" (knowing about yet failing to disclose to customers, at the point of sale or otherwise, that **the TIPM 7 installed in Plaintiffs' vehicles was defective and posed a safety hazard** (¶¶ 1-2, 19)); the "when" (from the time of the sale of the first Class Vehicle until the present day (¶¶ 28-40, 97)); and the "where" (the various channels through which Chrysler sold the vehicles, including the authorized dealers where Plaintiffs' purchased their vehicles). The court therefore concludes that Plaintiffs' factual averments are sufficient to allow Chrysler to prepare an adequate answer from the allegations. [Emphasis added.]

On September 3, 2014, after the Court effectively told Chrysler in *Velasco* it was headed for trial, Chrysler filed a Part 573 recall report on 188,757 2011 Dodge Durango's and Jeep Grand Cherokees for a defective Fuel Pump Relay in the TIPM-7 that caused stalling, the primary defect cited in CAS' Defect Petition. Chrysler omitted material information and knowingly misled NHTSA in the Part 573 report by failing to report the "Engineering and Customer Satisfaction Team investigations of TIPM performance in the field began in April or May 2012." Instead, Chrysler began the TIPM chronology almost a year and a half later in October 2013 in an effort to make NHTSA believe this was a timely recall and avoid a \$35 million civil penalty.

On October 23, 2014, CAS moved to [intervene](#) and [unseal](#) the discovery documents in *Velasco* to support the Center's defect petition. Unsealing of the documents was essential because the public court proceedings showed plaintiffs had discovered significant information on safety defects in the TIPM-7 and because NHTSA itself had already begun to withhold Chrysler's responses in its examination of CAS' petition. Incredibly, CAS could not find a single reference by NHTSA to *Velasco* or a request for any documents in *Velasco*, let alone requests for the all important discovery responses which Chrysler moved the District Court to seal. See Attachment B for an analysis of NHTSA Information Requests to Chrysler in DP14-004.

On January 7, 2015, plaintiffs and Chrysler conducted a Settlement Mediation before Judge Edward A. Infante in *Velasco* that resulted in a settlement contingent upon Chrysler agreeing to recall 2012-13 Jeep Grand Cherokees and Dodge Durango for the defective Fuel Pump Relay in the TIPM-7 that caused stalling, the primary defect cited in CAS' Defect Petition. (The proposed settlement was made final yesterday, August 17, 2015.) Both the [proposed Settlement Agreement](#) signed by Chrysler's lawyers and [Plaintiffs' Memorandum in Support of Motion for Preliminary Approval of Class Settlement](#) make note of this with the proposed Settlement Agreement stating:

WHEREAS, through the significant arm's-length settlement negotiations described above, the Parties ultimately reached an agreement to settle the Litigation contingent on FCA US thereafter agreeing to conduct a recall of model-years 2012 and 2013 Dodge Durango and Jeep Grand Cherokee vehicles to install an external fuel pump relay in alignment with the recall implemented for model-year 2011 Dodge Durango and Jeep Grand Cherokee vehicles;

August 18, 2015

Page Three

On February 27, 2015, after the mediation agreement in *Velasco* to do an expanded recall, Chrysler filed a Part 573 recall report on 338,216 2012-13 Dodge Durango's and Jeep Grand Cherokees for a defective Fuel Pump Relay in the TIPM-7 that caused stalling, the primary defect cited in CAS' Defect Petition. Again Chrysler omitted material information and knowingly misled NHTSA in the Part 573 report by failing to report the "Engineering and Customer Satisfaction Team investigations of TIPM performance in the field began in April or May 2012." Instead, Chrysler began the TIPM chronology almost a year and a half later in October 2013 in an effort to make NHTSA believe this was a timely recall and avoid a \$35 million civil penalty. In addition, Chrysler omitted any reference to the mediation agreement in *Velasco* to do this very recall.

The settlement agreement in *Velasco* is all the more important because it specifically includes the cost of rental cars and the \$1,100 to \$1,200 cost of replacement of the TIPM-7 in repairs before the recall and not just the \$100 to \$200 cost for the replacement of the defective Fuel Pump Relay in the TIPM-7 module.² In past recalls such as 12V-006 for the 2003-04 Ford Freestar and Mercury Monterey where the transmission failed catastrophically, Ford limited reimbursement to the failed part, not replacement of the transmission in the [owner notification letter](#):

Please note that this recall specifically addresses worn Torque Converter splines, which do not result in failure of other transmission components. Therefore, costs associated with replacement or repair of the transmission are not reimbursable under this recall. . . . [Only] eligibility for reimbursement for up to \$1,450 (reasonable and customary parts and labor charge for replacement of the Torque Converter).

The Part 577 [owner notification letter](#) in TIPM-7 recall 15V-115 limits reimbursement to "this specific condition . . . an internal fuel pump relay that could operate intermittently or fail without warning." Under NHTSA's recall regulation, 49 CFR § 573.13(e)(1)(i)(B), Chrysler can limit reimbursement to: "The cost of parts for the remedy, plus associated labor at local labor rates, miscellaneous fees such as disposal of waste, and taxes. Costs for parts may be limited to the manufacturer's list retail price for authorized parts." NHTSA itself washes its hands of any dispute between consumers and Chrysler over reimbursement: "Any disputes over the denial in whole or in part of a claim for reimbursement shall be resolved between the claimant and the manufacturer. NHTSA will not mediate or resolve any disputes regarding eligibility for, or the amount of, reimbursement." Id. at § 573.13(j). In sharp contrast to NHTSA's "it your problem" attitude to the consumer, the *Velasco* settlement provides:

In the event a Class Member has a properly-supported reimbursement request denied, he/she can contact Class Counsel identified in the Class Notice who will attempt to resolve the dispute amicably with counsel for FCA US.

NHTSA showed little interest in evaluating CAS' TIPM defect petition except to contrive reasons to deny it. First NHTSA violated both the National Traffic and Motor Vehicle Safety Act and its own regulations by taking 337 days to respond to the petition instead of the mandated 120 days.³

² Settlement II.C.3. "The offer made by FCA US in the recall notice to reimburse out-of-pocket costs for prior repairs includes an offer to reimburse part and labor costs for not only the fuel pump relay condition, but also related parts and labor and rental car costs that were reasonably incurred as a result of the condition,"

³ 49 USC § 30162 . Petitions by interested persons for standards and enforcement

(d) Actions of Secretary.-- The Secretary shall grant or deny a petition not later than 120 days after the petition is filed. If a petition is granted, the Secretary shall begin the proceeding promptly.

49 CFR § 552.8 Notification of agency action on the petition. . . .NHTSA will notify the petitioner of the decision to grant or deny the petition within 120 days after its receipt of the petition.

August 18, 2015

Page Four

Former NHTSA Administrator Joan Claybrook made it clear to agency staff almost 40 years on November 20, 1978, that the 120 day period is not optional. See [NHTSA Order 800-2: Procedures for Processing Petitions](#), [NHTSA Memo: Management of Engineering Analyses and Petitions](#) made it even more clear. “In the case of petitions, there are no exceptions.”

NHTSA has contorted the role of the defect petition. A defect petition is not an investigation and a petitioner is not required to present engineering proof that a defect exists. It is a mechanism through which the agency decides whether a defect investigation is warranted in the specified 120 day period. Again, the Act and regulations make it clear that all a petition requires is: (1) have a heading containing the word “Petition”, (2) be written in English, (3) set forth facts claimed establish an order is necessary and (4) describe order sought. NHTSA should have granted our petition within the statutory time limits, then proceeded with its engineering assessment as part of a preliminary evaluation or other formal defect investigation.

CAS’ petition relied on consumer complaints submitted to CAS, alleging a variety of safety problems and implicating Chrysler TIPMs. The petition was not crafted as a detailed engineering assessment of a complex electrical relay system, although the denial appears to treat it as such. The complaints on TIPM to CAS were submitted by vehicle owners who had either a chronic stall condition or a variety of odd electrical symptoms, and then discovered that the TIPM was at fault. Many of these owners were asked to pay for complete replacements of the entire TIPM, suggesting that these conditions were related to a total failure of the module.

In denying CAS’ defect petition NHTSA created a number of strawmen that concealed the fact that the CAS Petition along with the class action successfully forced the two TIPM recalls as discussed above. The first and largest strawman was to ignore the heart of the CAS Petition which was stalling. The vast majority of the CAS, NHTSA and other website complaints discussed above were on stalling. The agency totally misses the point emphasized in our November 13 letter which is that stalling is the dangerous condition but it can be accompanied by other lesser problems:

The most often cited TIPM failure is a loss of vehicle power that can create a dangerous stall condition at any speed. Additionally, there are numerous complaints alleging bizarre and unexplained headlight and taillight failure, windshield wiper activity, instrument panel failure, and door lock problems.

CAS pointed out that the agency had conducted at least 329 safety recalls for stalling through 2013. The agency couldn’t run away from stalling fast enough. Instead the agency focused on other, lesser problems to divert attention away from stalling. Just like GM ignition switch, the agency ignored the forest for the trees. Stalling is now and always will be a safety defect as established by the defect cases litigated by the agency in the 1970’s, cited in our petition and never discussed by the agency.

The CAS petition clearly emphasized this problem as the main focus of our petition. CAS continued to emphasize stalling dangers in our complaint supplements. For example, on September 10, 2014, CAS submitted a complaint supplement to NHTSA stating, “Although TIPM failure contributes to a range of problems in vehicle electric components, the safety issue which continues to present itself in complaints is stalling, often in traffic where the dangers are obvious.” As the denial recognizes, the stall condition described in a large majority of CAS complaints was a result of failure of the fuel pump relay module in the TIPM-7.

August 18, 2015

Page Five

Another strawman the agency pulled out of its bag of tricks is to define unintended acceleration as something that it isn't. The Center defined it as inadvertent movement where the vehicle continued to move or accelerate when the consumer didn't want it to. In the past the agency classified sudden acceleration as uncontrolled acceleration accompanied by brake failure, and then said it couldn't find brake failure to dismiss complaints when all along complaints did not say there was brake failure but that they couldn't stop the vehicle before a crash. By focusing on a few complaints of vehicles that continued to move, the agency tried to shift attention from what CAS said, and events proved, was the major safety problem - stalling.

Yet another strawman created by the agency is TIPM-6 which was never part of the CAS Petition:

Interpreted broadly, the CAS petition potentially affects approximately 10 million 7 vehicles equipped with TIPM -6 or TIPM-7 modules. The petition scope does not appear to recognize the functional distinctions between TIPM-6 and TIPM-7. The petition also does not distinguish between the significant electronics technology differences between the relay based TIPM-7 and an all solid-state Field Effect Transistors (FET) TIPM-6.

The CAS petition made the request that NHTSA open "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." The TIPM-7 was the only Totally Integrated Power Module installed in Chrysler vehicles beginning in the 2007 model year, as the TIPM-6 was introduced at least as early as the 2006 model year. See NHTSA Recall 05V-461 involving the 2006 Dodge Ram 1500. From the get-go, NHTSA itself identified the [scope of the CAS Petition](#) as 2007-14 Chrysler/Dodge/Jeep SUV's, trucks & vans w/TIPM-7. Yet eleven months later, we find NHTSA wasted time and resources into looking at TIPM-6 vehicles to the point at which it even calculated the number of vehicles by make and model if it opened a hypothetical investigation that the Center never requested.

Another strawman erected by the agency is to assume the Center had access to all the information gathered by the agency during its illegally long consideration of the Center Petition. The Center did not and could not because it was not available prior to the agency requesting the information from Chrysler. Indeed, given the reams of information gathered from Chrysler and withheld by the agency as documented in Attachment B, the Center could never know what information the agency had that supported the Petition.

One fact stands out in the agency's wrongful denial of the CAS Petition is there is not a single document in the record from the extensive discovery in *Velasco* nor is there anything to show NHTSA ever requested information on *Velasco* even though it obtained information on two minor lawsuits, *Marks and Cillo*. It is no wonder that Chrysler fought so hard to prevent CAS from doing what NHTSA didn't do, obtain and introduce the *Velasco* discovery in this petition.

Sincerely,



Michael Brooks
Staff Attorney

Attachment A - TIPM-7 Timeline

<p><i>Velasco v Chrysler</i> Class Action Filed in Federal District Court in California</p>	<p>November 11, 2013</p>
<p>Chrysler Interrogatory Response in <i>Velasco</i></p>	<p>April 11, 2014</p> <ul style="list-style-type: none"> • Engineering and Customer Satisfaction Team investigations of TIPM performance in the field began in April or May, 2012. • Regulatory Affairs began an investigation in October 2013.
<p><i>Velasco</i> Amended Complaint</p>	<p>May 5, 2014</p>
<p>Center for Auto Safety Defect Petition</p>	<p>August 21, 2014</p>
<p>Court Denies Chrysler Motion to Dismiss <i>Velasco</i></p>	<p>August 22, 2014</p>
<p>Chrysler TIPM-7 Recall 14V-530 2011 Dodge Durango, Jeep Grand Cherokee</p>	<p>September 3, 2014</p> <ul style="list-style-type: none"> • On October 1, 2013, an investigation was initiated after TIPM-7 parts went on national backorder. • In October of 2013, a preliminary review of field narratives and failed field vehicles appeared to indicate the fuel pump circuit in the TIPM-7 was not energizing the fuel pump. • On November 15, 2013, an analysis of ten WK fuel pump relays was completed during a tear down event. All ten of these relays showed contact spring deformation. • On November 20, 2013, analysis of a failed WK/WD fuel pump relay (not part of the 11/15/13 tear down) showed significant contact corrosion. • During December 2013 – February 2014, cycle testing was conducted to analyze the effect of inductance and current at the fuel pump relay, and to attempt to recreate the TIPM-7 failure mode as seen in field returns of parts. This Cycle testing was unable to recreate TIPM-7 fuel pump relay failures. • In March – April 2014, steady state load tests were conducted to analyze the effect of continuous high temperature and high current at the fuel pump relay, and to attempt to recreate the TIPM-7 failure mode as seen in field returns of parts. This steady state load testing was unable to recreate TIPM-7 fuel pump relay failures. • In May – August 2014, multiple fuel pump relay versions were tested in “worst case” WK/WD vehicle operating conditions with a more severe duty cycle. Testing was able to successfully recreate TIPM-7 fuel pump relay failures in an accelerated time frame, as well as confirm the reliability of the external relay solution. • The scope has been determined based on field data inputs and engineering analysis to be all 2011 3.6L and 5.7L WK and WD vehicles. • As of August 25, 2014, Chrysler is unaware of any accidents or injuries potentially related to this issue. • On August 26, 2014, Chrysler determined, through the Vehicle Regulations Committee, to conduct a voluntary safety recall.
<p><i>Velasco</i> CAS Motion to Unseal Chrysler Documents on TIPM-7</p>	<p>October 23, 2014</p> <ul style="list-style-type: none"> • The plaintiffs have moved for a preliminary injunction requesting this Court order Chrysler to warn its customers about the defect. But many of the documents relating to that motion have been sealed. Even the requested warning itself has been redacted. The Center for Auto Safety (“the Center”) has moved to intervene for the limited purpose of seeking access to these documents. As explained in the motion to intervene, the Center has a strong interest in these records: It plans to use them to support its petition to the National Highway Traffic Safety Administration to investigate the alleged defect and to educate the public about any safety concerns.

<p>14V-530 Part 577 Consumer Notice Mailed</p>	<p>December 19, 2014</p> <ul style="list-style-type: none"> • If you have already experienced this condition and have paid to have it repaired, please send your original receipts and/or other adequate proof of payment to the following address for reimbursement:
<p><i>Velasco</i> Settlement Mediation</p>	<p>January 7, 2015</p> <ul style="list-style-type: none"> •Chrysler agrees to recall 2012-13 Grand Cherokee & Durango as part of settlement.
<p>Chrysler TIPM-7 Recall 15V-115 2012-13 Dodge Durango, Jeep Grand Cherokee</p>	<p>February 27, 2015</p> <ul style="list-style-type: none"> • On Oct 1, 2013, an investigation was initiated after the safety office was notified that TIPM-7 parts were on national backorder due to high WK/WD demand. • In Oct of 2013, a preliminary review of field narratives & vehicles indicated a fuel pump circuit in the TIPM-7 was not energizing the fuel pump. • On Nov 6, 2013, in order to alleviate the TIPM backorder, an existing MOPAR kit, offering a standalone external replacement relay, was made available for vehicles exhibiting TIPM fuel pump relay symptoms. • In Nov 2013, 11 relays were analyzed and demonstrated both spring deformation and contact erosion. • During Dec 2013 – Feb 2014, cycle testing was conducted to analyze the effect of inductance and current at the fuel pump relay, but was unable to recreate TIPM-7 fuel pump relay failures. • In Mar 2014, vehicle level analysis identified the presence of a startup pulse, which momentarily turns the fuel pump relay off in some vehicles, increasing relay cycles. • In Mar – Apr 2014, steady state load tests were conducted to analyze the effect of continuous high temperature and high current at the fuel pump relay, but were unable to recreate TIPM-7 fuel pump relay failures. • In May – Aug 2014, multiple fuel pump relay versions were put under test replicating the worst case WK/WD vehicle operating conditions with a more severe duty cycle. Testing was able to successfully recreate TIPM-7 fuel pump relay failures in an accelerated time frame, as well as confirm the reliability of the external relay solution. • In Aug 2014, Chrysler's VRC authorized a voluntary safety recall for 2011 MY WK and WD 3.6L and 5.7L engines. • In Sept 2014 – Jan 2015, additional testing and field data analysis indicated that additional WK/WD vehicles may be susceptible to the same type of fuel pump relay malfunction. On Feb 17, 2015 the FCA US VRC authorized a voluntary safety recall for the 2012-2013 MY WK and WD 3.6L and 5.7L engines.
<p><i>Velasco</i> Settlement Memo in Support of Motion for Preliminary Approval of Class Settlement</p>	<p>June 10, 2015</p> <ul style="list-style-type: none"> • Finalization of the settlement terms were contingent on FCA US initiating a voluntary recall of the 2012 and 2013 Jeep Grand Cherokee and Dodge Durango, which it has done; this recall will proceed in parallel with the previously-announced recall of the 2011 model year. • In addition, FCA US will reimburse vehicle owners and lessees for any related repair and rental car expenses, and will extend its standard warranty from 3 years/36,000 miles to 7 years/70,000 miles for TIPM repairs conducted through the recall.
<p>NHTSA Denies CAS TIPM Defect Petition DP14-004</p>	<p>July 24, 2015</p>
<p>15V-115 Part 577 Consumer Notice to be Mailed</p>	<p>July 27 to August 3, 2015</p> <ul style="list-style-type: none"> • If you have already experienced this specific condition and have paid to have it repaired, please send your original receipts and/or other adequate proof of payment to the following address for reimbursement:
<p><i>Velasco</i> Settlement Approved</p>	<p>August 17, 2015</p>

Velasco Settlement
Notice to be Mailed

September 2015

- You can seek reimbursement for any part, labor, or rental costs reasonably incurred as a result of the TIPM defect described in Section 8. You can request reimbursement for any costs reasonably related to a failed TIPM, even if those costs are associated with the repair or replacement of parts other than the TIPM itself. You can request reimbursement of costs associated with renting a substitute vehicle if those costs are reasonably related to the alleged TIPM defect.

Attachment B - Documents Withheld in DP14-004 File

NHTSA Inquiry	Chrysler Response	Withheld
Sep 3, 2014 Email Request Not on Public Record from Unidentified Employee	Sep. 15, 2014 Letter With Summaries of EWR Death Claims, Attachments Redacted	Police Reports, Lawsuit Complaints, Insurance Claims, etc
Sep. 24, 2014 Email Request from Jeff Quandt for Materials from Sep. 23 Chrysler Presentation	Sep. 26, 2014 Cover Letter with Attached Materials Submitted to NHTSA Chief Counsel	Sep. 24, 2014 Email Request, All Sep. 23, 2014 Presentation Materials
Sep. 24, 2014 Email Request from Jeff Quandt for Materials from Oct 7 Chrysler Presentation [Not explained how Sep. 24 email can seek materials from Oct. 7 meeting]	Oct. 7, 2014 Cover Letter with Redacted Materials Submitted to NHTSA Chief Counsel	Sep. 24, 2014 Email Request, Confidentiality Request & Redacted Pages 3-6 & 8-22 of presentation & Cover Sheet, NHTSA Thermal Events
Oct. 20, 2014 Information Request Letter from NHTSA	Nov. 25, 2014 Cover Letter with Responses to Q's 1,2,8,9. Heavy Redactions to 8 & 9. (See attachment for details.)	Confidentiality Request & Redacted Answers to Q's 8, 9 plus personal identifiers in Q's 2 & 4-6.
Oct. 20, 2014 Information Request Letter from NHTSA	Dec. 12, 2014 Cover Letter with Responses to Q's 3-7 & 10 & repeat of 1,2,8,9 in Nov. 25 response. Heavy Redactions to 8 & 9. (See attachment for details.)	Confidentiality Request & Redacted Answers to Q's 8, 9 plus personal identifiers in Q's 2 & 4-6.
Undated Informal Information Request Not on Public Record & Oct. 31, 2014 Email Request from Jeff Quandt for Q's 1-5	Jan. 20, 2015 Narrative Cover Letter with Redacted Enclosures Provided in a Separate 22 page Document Submitted to NHTSA Chief Counsel with Exception of page 8	Informal Information Request & Oct. 31, 2014 Email Request from Jeff Quandt, Confidentiality Request & Withheld Enclosures
Undated Informal Information Request Not on Public Record for updated field data	Jan. 28, 2015 Cover Letter & Attachment	None
Undated Informal Information Request Not on Public Record from Jeff Quandt for updated TIPM field & warranty data	Feb. 4, 2015 Cover Letter with Redacted Materials Submitted to NHTSA Chief Counsel	Informal Information Request from Jeff Quandt, Confidentiality Request & Redacted Material;
Undated Informal Information Request Not on Public Record from Jeff Quandt for 37 VIN assessments, thermal event analysis report	Mar. 6, 2015 Cover Letter with pp 4-10, 14-19, 21-22 of Attached Presentation Redacted & Submitted to NHTSA Chief Counsel	Informal Information Request from Jeff Quandt, Confidentiality Request & Redacted Pages

Chrysler Responses of 11/25/14 and 12/12/14 to NHTSA Information Request of 10/20/14

Chrysler responded in two separate letters, one in November and one in December, to NHTSA's information request. The November letter answered questions 1, 2, 8, and 9. The December letter repeated answers 1, 2, 8, and 9, and also furnished responses to 3, 4, 5, 6, 7, and 10.

NHTSA Request	Chrysler Response	Withheld
1. Number of subject vehicles sold and TIPM parts No.	ENCLOSURE 1- TIPM-7 PART NUMBERS	No Redactions
2. Information on complaint vehicles	ENCLOSURE 2, titled DP14 004 PRODUCTION DATA.accdb.	Last 6 of VIN redacted.
3. Number of field reports, complaints, lawsuits, etc.	Provided in cover letter text	No Redactions
4. Information on each field report, complaint, lawsuit, etc.	ENCLOSURE 4, titled DP14 004_INCIDENT DATA.accdb	Redaction of Owner name, address, phone, and last 6 of VIN No information provided on <i>Velasco v. Chrysler</i>
5. Documents related to each field report, complaint, lawsuit, etc.	ENCLOSURE 5, titled DP14 004 Narrative data.pdf.	Redaction of owner name and address, and VIN last 6 No information provided on <i>Velasco v. Chrysler</i>
6. Claims related to repair/replacement of TIPM module	ENCLOSURE 6, titled DP14 004 - WARRANTY DATA.accdb, and Extended Warranty.xlsx	Last 6 of VIN redacted.
7. Service, warranty, and other documents related to defect	ENCLOSURE 7 – one Star Case	No Redactions
8. TIPM-7 Assembly Drawings and Return Parts Analysis	ENCLOSURE 8	Drawings heavily redacted but for 2 images, Return Parts Analysis completely redacted
9. Complaints, field reports, warranty claims related to recall decision; Pareto chart of failure modes (Fuel Relay); all documents related to field data analyses, returned parts, testing	ENCLOSURE 9	Heavily redacted
10. Chrysler assessment of field data for failures described in defect petition	ENCLOSURE 10, titled Engineering Assessment - 231 VINs.xlsx	Excel file corrupted, cannot open