



October 14, 2011

Clarence Ditlow
Executive Director
Center for Auto Safety
1825 Connecticut Ave NW
Suite 330
Washington, D.C. 20009-5708

Dear Mr. Ditlow:

Your letter to Sergio Marchionne of September 1, 2011 has been referred to me for response. As you know, NHTSA opened PE10-031 to investigate whether the fuel system of 1993-2004 Model Year Jeep Grand Cherokee vehicles presents an unreasonable fire hazard in rear impact crashes. The contentions you made in your letter to Mr. Marchionne have also been part of various submissions the Center for Auto Safety has made to the PE10-031 docket and, as such, are being evaluated by NHTSA.

Chrysler Group LLC (Chrysler Group) has responded to NHTSA's information requests in connection with PE10-031. Chrysler Group's examination of the fuel system design history of 1993-2004 Model Year Jeep Grand Cherokee vehicles supports its belief that sound engineering judgment and due care were used in the design and development of the fuel systems of these vehicles. The vehicles were tested to ensure that they exceeded the applicable rear impact requirements of FMVSS 301.


The vehicles' fuel system performance has been closely monitored in the field over the past nineteen years with over 300 billion miles driven by these vehicles. Rear impacts resulting in fire are extremely rare. All of the Jeep Grand Cherokee rear impact collision fires that Chrysler Group has investigated over the past nineteen years involved high energy rear impact collisions with substantially higher energy levels than the applicable FMVSS 301 energy levels. None of these fires were attributable to a design or manufacturing defect in the fuel system.

Further, Chrysler Group has analyzed publicly available statistical data involving over 21,000 rear impacts in the subject vehicles and their peers. It is apparent from this data that there is no meaningful statistical difference of rear impact and/or rollover crash events resulting in fire between the 1993-2004 Jeep Grand Cherokee and its peer vehicles.

Based on Chrysler Group's analysis of the design and testing of the vehicles, its investigation of accidents in the field, and its analysis of statistical data, 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 impacts.

Sincerely,

A handwritten signature in black ink, appearing to read "David D. Dillon". The signature is written in a cursive style with a large initial "D".

David D. Dillon
Senior Manager
Regulatory Affairs - Product Investigations and Campaigns