



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

1200 New Jersey Avenue SE.
Washington, DC 20590

OCT 20 2014

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Philip Hartnagel, Senior Manager
Product Investigation and Campaigns
Chrysler Group, LLC
800 Chrysler Drive, CIMS 482-00-91
Auburn Hills, MI 48326-2757

NVS-213krh
DP14-004

Dear Mr. Hartnagel:

This letter is to inform you that the Office of Defects Investigation (ODI) of the National Highway Traffic Safety Administration (NHTSA) has opened Defect Petition DP14-004 to review allegations of Totally Integrated Power Module (TIPM) failures resulting in engine stall while driving, airbag non-deployment incidents, unintended acceleration and/or vehicle fire in certain model year (MY) 2007-2014 Chrysler, Dodge and Jeep sport utility vehicles (SUVs), pickup trucks (trucks) and mini-vans (vans) equipped with TIPM-7 modules and manufactured by Chrysler Group LLC, and to request certain information.

This office has received a defect petition from The Center for Auto Safety (CAS) requesting an investigation of failures of TIPMs installed in Chrysler SUV's, trucks, and vans beginning in the 2007 model year. The petitioner alleges TIPM failures have resulted in engine stall, airbag non-deployment, failure of fuel pump shutoff resulting in unintended acceleration, fires and other symptoms. As supporting evidence, the CAS provided a list of complaints that CAS has received that are allegedly related to Chrysler TIPM failures. This information request is focused on the defect condition and vehicles equipped with TIPM-7 modules. A copy of the petition and supporting information are provided for your information.

Unless otherwise stated in the text, the following definitions apply to these information requests:

- **Subject vehicles:** MY 2007 through 2014 Chrysler, Dodge and Jeep SUV's, trucks & vans equipped with TIPM-7 modules and manufactured for sale or lease in the United States and federalized territories.
- **Subject complaint vehicles:** the petitioner's list of complaint vehicles including the petitioner two supplemental complaint vehicles and all vehicles associated with a Vehicle Owner's Questionnaire (VOQ) provided as an attachment to this letter.

- **Subject components:** all TIPM-7 modules used as original equipment or service replacement parts in the subject vehicles.
- **Subject recall:** NHTSA safety recall 14V-530 (Chrysler P54).
- **Chrysler:** Chrysler Group LLC (collectively, Chrysler), all of its past and present officers and employees, whether assigned to its principal offices or any of its field or other locations, including all of its divisions, subsidiaries (whether or not incorporated) and affiliated enterprises and all of their headquarters, regional, zone and other offices and their employees, and all agents, contractors, consultants, attorneys and law firms and other persons engaged directly or indirectly (e.g., employee of a consultant) by or under the control of Chrysler (including all business units and persons previously referred to), who are or, in or after January 1, 2000, were involved in any way with any of the following related to the alleged defect in the subject vehicles:
 - a. Design, engineering, analysis, modification or production (e.g. quality control);
 - b. Testing, assessment or evaluation;
 - c. Consideration, or recognition of potential or actual defects, reporting, record-keeping and information management, (e.g., complaints, field reports, warranty information, part sales), analysis, claims, or lawsuits; or
 - d. Communication to, from or intended for zone representatives, fleets, dealers, or other field locations, including but not limited to people who have the capacity to obtain information from dealers.
- **Alleged defect:** All allegations of TIPM-7 module failure or malfunction resulting in any one or more of the following symptoms or conditions:
 - a. Engine stall while driving;
 - b. Airbag non-deployment;
 - c. Unintended acceleration; or
 - d. Vehicle fire.
- **Document:** “Document(s)” is used in the broadest sense of the word and shall mean all original written, printed, typed, recorded, or graphic matter whatsoever, however produced or reproduced, of every kind, nature, and description, and all non-identical copies of both sides thereof, including, but not limited to, papers, letters, memoranda, correspondence, communications, electronic mail (e-mail) messages (existing in hard copy and/or in electronic storage), faxes, mailgrams, telegrams, cables, telex messages, notes, annotations, working papers, drafts, minutes, records, audio and video recordings, data, databases, other information bases, summaries, charts, tables, graphics, other visual displays, photographs, statements, interviews, opinions, reports, newspaper articles, studies, analyses, evaluations, interpretations, contracts, agreements, jottings, agendas, bulletin, notices, announcements, instructions, blueprints, drawings, as-builts, changes, manuals, publications, work schedules, journals, statistical data, desk, portable and computer calendars, appointment books, diaries, travel reports, lists, tabulations, computer printouts, data processing program libraries, data processing inputs and outputs, microfilms, microfiches, statements for services, resolutions, financial statements,

governmental records, business records, personnel records, work orders, pleadings, discovery in any form, affidavits, motions, responses to discovery, all transcripts, administrative filings and all mechanical, magnetic, photographic and electronic records or recordings of any kind, including any storage media associated with computers, including, but not limited to, information on hard drives, floppy disks, backup tapes, and zip drives, electronic communications, including but not limited to, the Internet and shall include any drafts or revisions pertaining to any of the foregoing, all other things similar to any of the foregoing, however denominated by Chrysler, any other data compilations from which information can be obtained, translated if necessary, into a usable form and any other documents. For purposes of this request, any document which contains any note, comment, addition, deletion, insertion, annotation, or otherwise comprises a non-identical copy of another document shall be treated as a separate document subject to production. In all cases where original and any non-identical copies are not available, "document(s)" also means any identical copies of the original and all non-identical copies thereof. Any document, record, graph, chart, film or photograph originally produced in color must be provided in color. Furnish all documents whether verified by Chrysler or not. If a document is not in the English language, provide both the original document and an English translation of the document.

- **Other Terms:** To the extent that they are used in these information requests, the terms "claim," "consumer complaint," "dealer field report," "field report," "fire," "fleet," "good will," "make," "model," "model year," "notice," "property damage," "property damage claim," "rollover," "type," "warranty," "warranty adjustment," and "warranty claim," whether used in singular or in plural form, have the same meaning as found in 49 CFR 579.4.

In order for my staff to evaluate the alleged defect, certain information is required. Pursuant to 49 U.S.C. § 30166, please provide numbered responses to the following information requests. Insofar as Chrysler has previously provided a document to ODI, Chrysler may produce it again or identify the document, the document submission to ODI in which it was included and the precise location in that submission where the document is located. When documents are produced, the documents shall be produced in an identified, organized manner that corresponds with the organization of this information request letter (including all individual requests and subparts). When documents are produced and the documents would not, standing alone, be self-explanatory, the production of documents shall be supplemented and accompanied by explanation.

Please repeat the applicable request verbatim above each response. After Chrysler's response to each request, identify the source of the information and indicate the last date the information was gathered.

1. State the number of subject vehicles sold by model, model year, and TIPM part number.
2. Provide the following information for each subject complaint vehicle:
 - a. Vehicle identification number (VIN);
 - b. Model;

- c. Model Year;
- d. Engine;
- e. TIPM part number;
- f. Date of manufacture;
- g. Date warranty coverage commenced;
- h. Applicability and completion date for all TIPM-related recalls; and
- i. The State in the United States where the vehicle was originally sold or leased (or delivered for sale or lease).

Provide the table in Microsoft Access 2010, or a compatible format, entitled "DP14_004_PRODUCTION DATA." See Enclosure 1, Data Collection Disc, for a pre-formatted table that provides further details regarding this submission.

3. State the number of each of the following, received by Chrysler, or of which Chrysler is otherwise aware, which relate to, or may relate to, the subject component in the subject complaint vehicles:
 - a. Consumer complaints, including those from fleet operators;
 - b. Field reports;
 - c. Reports involving a crash, fire, injury or fatality;
 - d. Property damage claims;
 - e. Third-party arbitration proceedings where Chrysler is or was a party to the arbitration; and
 - f. Lawsuits, both pending and closed, in which Chrysler is or was a defendant or codefendant.

For each subpart, separately state the total number of each item (e.g., consumer complaints, field reports, etc.). Multiple incidents involving the same vehicle are to be counted separately. Multiple reports of the same incident are also to be counted separately (i.e., a consumer complaint and a field report involving the same incident in which a crash occurred are to be counted as a crash report, a field report and a consumer complaint).

4. Separately, for each item (complaint, report, claim, notice, or matter) within the scope of your response to Request No.3, state the following information:
 - a. Chrysler's file number or other identifier used;
 - b. The category of the item, as identified in Request No. 3 (i.e., consumer complaint, field report, etc.);
 - c. Vehicle owner or fleet name (and fleet contact person), address, and telephone number;
 - d. Vehicle's VIN;
 - e. Vehicle's model and model year;
 - f. Vehicle's mileage at time of incident;
 - g. Incident date;
 - h. Report or claim date;
 - i. Whether a crash is alleged;
 - j. Whether a stall while driving incident is alleged;
 - k. Whether an airbag non-deployment or other airbag malfunction is alleged;
 - l. Whether an unintended acceleration incident is alleged;

- m. Whether a fire is alleged;
- n. Whether a thermal incident (e.g., smoking or heat damage) is alleged;
- o. Whether property damage is alleged;
- p. Number of alleged injuries, if any;
- q. Number of alleged fatalities, if any; and
- r. Whether the TIPM module was returned for analysis by Chrysler or the TIPM supplier.

Provide this information in Microsoft Access 2010, or a compatible format, entitled "DP14_004_INCIDENT DATA." See Enclosure 1, Data Collection Disc, for a pre-formatted table that provides further details regarding this submission.

- 5. Produce copies of all documents related to each item within the scope of Request No.3. Organize the documents separately by category (i.e., consumer complaints, field reports, event data recorder reports, police reports, etc.) and describe the method Chrysler used for organizing the documents. Describe in detail the search methods and search criteria used to identify the items in response to Request No.3.
- 6. State, for each subject complaint vehicle, a total count for all of the following categories of claims related to repair or replacement of the TIPM module, collectively, that have been paid by Chrysler to date in the subject complaint vehicles: warranty claims; extended warranty claims; claims for good will services that were provided; field, zone, or similar adjustments and reimbursements; and warranty claims or repairs made in accordance with a procedure specified in a technical service bulletin or customer satisfaction campaign.

Separately, for each such claim, state the following information:

- a. Chrysler's claim number;
- b. Vehicle owner or fleet name (and fleet contact person) and telephone number;
- c. VIN;
- d. Repair date;
- e. Vehicle mileage at time of repair;
- f. Repairing dealer's or facility's name, telephone number, city and state or ZIP code;
- g. Labor operation number and description;
- h. Problem code, DTC codes and description;
- i. Replacement part number(s);
- j. Replacement part supplier and description;
- k. Concern stated by customer;
- l. Cause and Correction stated by dealer/technician; and
- m. Additional comments, if any, by dealer/technician relating to claim and/or repair.

Provide this information in Microsoft Access 2003 or 2007, or a compatible format, entitled "DP14_004_WARRANTY DATA." See Enclosure 1, Data Collection Disc, for a pre-formatted table that provides further details regarding this submission.

- 7. Produce copies of all service, warranty, and other documents that relate to, or may relate to, the alleged defect in the subject vehicles, that Chrysler has issued to any dealers, regional or zone offices, field offices, fleet purchasers, or other entities. This includes, but is not limited

to, bulletin, advisories, informational documents, training documents, or other documents or communications, with the exception of standard shop manuals. Also include the latest draft copy of any communication that Chrysler is planning to issue within the next 120 days.

8. Provide the following information for the subject components:
 - a. TIPM-7 assembly drawings including PCB (printed circuit board) electrical schematics, stencil, layout, and BOM (Bill of Material) in PDF; and
 - b. Describe, and provide copies of all documents relating to, all return part analyses that relate to, or may relate to, the alleged defect in the subject complaint vehicles.
9. Provide the following information regarding the subject recall:
 - a. State the numbers of consumer complaints, field reports and warranty claims related to the recall condition in the subject components used in the recalled population that were received by Chrysler at the time of the recall decision;
 - b. Provide a Pareto chart of the failure modes/effects associated with the fuel pump relay defect condition (e.g., stall while driving, no start, etc.); and
 - c. Describe, and provide copies of all documents relating to, all field data analyses, testing, returned part analyses and design reviews performed by Chrysler to determine the root cause and scope of the fuel pump relay defect condition.
10. Furnish Chrysler's assessment of the field data relating to, and the technical basis for, each of the alleged failure effects identified in the defect petition (i.e., stall while driving, airbag non-deployment, unintended acceleration and fire) in the subject complaint vehicles.

Legal Authority for This Request

This letter is being sent to Chrysler pursuant to 49 U.S.C. § 30166, which authorizes NHTSA to conduct any investigation that may be necessary to enforce Chapter 301 of Title 49 and to request reports and the production of things. It constitutes a new request for information.

Civil Penalties

Chrysler's failure to respond promptly and fully to this letter could subject Chrysler to civil penalties pursuant to 49 U.S.C. § 30165 or lead to an action for injunctive relief pursuant to 49 U.S.C. § 30163. (Other remedies and sanctions are available as well.) The Vehicle Safety Act, as amended, 49 U.S.C. § 30165(b), provides for civil penalties of up to \$7,000 per day, with a maximum of \$17,350,000 for a related series of violations, for failing or refusing to perform an act required under 49 U.S.C. § 30166. *See* 49 CFR 578.6 (as amended by 77 Fed. Reg. 70710 (November 27, 2012)). This includes failing to respond completely to ODI information requests.

If Chrysler cannot respond to any specific request or subpart(s) thereof, please state the reason why it is unable to do so. If on the basis of attorney-client, attorney work product, or other privilege, Chrysler does not submit one or more requested documents or items of information in response to this information request, Chrysler must provide a privilege log identifying each

document or item withheld, and stating the date, subject or title, the name and position of the person(s) from, and the person(s) to whom it was sent, and the name and position of any other recipient (to include all carbon copies or blind carbon copies), the nature of that information or material, and the basis for the claim of privilege and why that privilege applies.

Confidential Business Information

All business confidential information must be submitted directly to the Office of Chief Counsel as described in the following paragraph and should not be sent to this office. In addition, do not submit any business confidential information in the body of the letter submitted to this office. Please refer to DP14-004 in Chrysler's response to this letter and in any confidentiality request submitted to the Office of Chief Counsel.

If Chrysler claims that any of the information or documents provided in response to this information request constitute confidential commercial material within the meaning of 5 U.S.C. § 552(b)(4), or are protected from disclosure pursuant to 18 U.S.C. § 1905, Chrysler must submit supporting information together with the materials that are the subject of the confidentiality request, in accordance with 49 CFR Part 512, as amended, to the Office of Chief Counsel (NCC-111), National Highway Traffic Safety Administration, Room W41-227, 1200 New Jersey Avenue, S.E., Washington, D.C. 20590. Chrysler is required to **submit two copies of the documents containing allegedly confidential information (except only one copy of blueprints) and one copy of the documents from which information claimed to be confidential has been deleted.** Please remember that the phrase "ENTIRE PAGE CONFIDENTIAL BUSINESS INFORMATION" or "CONTAINS CONFIDENTIAL BUSINESS INFORMATION" (as appropriate) must appear at the top of each page containing information claimed to be confidential, and the information must be clearly identified in accordance with 49 CFR 512.6. If you submit a request for confidentiality for all or part of your response to this IR, that is in an electronic format (e.g., CD-ROM), your request and associated submission must conform to the new requirements in NHTSA's Confidential Business Information Rule regarding submissions in electronic formats. *See* 49 CFR 512.6(c) (as amended by 72 Fed. Reg. 59434 (October 19, 2007)).

If you have any questions regarding submission of a request for confidential treatment, contact Otto Matheke, Senior Attorney, Office of Chief Counsel at otto.matheke@dot.gov or (202) 366-5253.

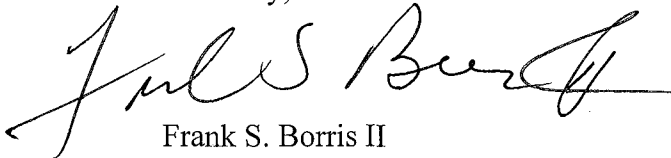
Due Date

Chrysler's response to this letter, in duplicate, together with a copy of any confidentiality request, must be submitted to this office by November 25, 2014. If Chrysler finds that it is unable to provide all of the information requested within the time allotted, Chrysler must request an extension from Jeff Quandt of my staff at (202) 366-5207 no later than five business days before the response due date. If Chrysler is unable to provide all of the information requested by the original deadline, it must submit a partial response by the original deadline with whatever information Chrysler then has available, even if an extension has been granted.

Please send email notification to Kareem Habib at Kareem.Habib@DOT.gov and to ODI_IRresponse@dot.gov when Chrysler sends its response to this office and indicate whether there is confidential information as part of Chrysler's response.

If you have any technical questions concerning this matter, please call Kareem Habib of my staff at (202) 366-8703.

Sincerely,

A handwritten signature in black ink, appearing to read "Frank S. Borris II". The signature is fluid and cursive, with a long horizontal stroke at the end.

Frank S. Borris II
Director, Office of Defects Investigation

Enclosure 1, one CD-ROM titled Data Collection Disc containing three Microsoft Access database template files.

Attachment A: VOQ Numbers

Attachment A

All CAS complaint vehicles including supplemental submissions:

NHTSA Ref. No. 10637920.

Engine stall while driving VOQs:

10616469, 10628311, 10621901, 10631277, 10547800, 10547852, 10610556, 10629936, 10615589, 10592802, 10630305, 10565069, 10588718, 10542104, 10548422, 10548810, 10616029, 10549729, 10549797, 10547388, 10546386, 10545162, 10631154, 10549560, 10551603, 10542179, 10630696, 10630033, 10549260, 10564004, 10595581, 10628357, 10618301, 10617618, 10617135, 10607654, 10559129, 10628797, 10545452, 10628378, 10616731, 10631221, 10626652, 10538015, 10615223, 10551202, 10551975, 10609792, 10631249, 10547976, 10621588, 10621853, 10618913, 10537814, 10547311, 10616069, 10576140, 10562104, 10541944, 10545663, 10586272, 10606925, 10555242, 10629035, 10620912, 10620950, 10546200, 10553999, 10573120, 10548766, 10558661, 10616359, 10558489, 10576610, 10626754, 10627366, 10619081, 10626936, 10626629, 10626636, 10538204, 10538292, 10544170, 10555153, 10558300, 10567835, 10597876, 10626235, 10630288, 10644349, 10643956, 10643924, 10643667, 10643530, 10641723, 10641231, 10640697, 10640370, 10639879, 10639643, 10638403, 10638052, 10638030, 10637694, 10637375, 10637368, 10637347, 10637296, 10637203, 10636919, 10633702, 10633668, 10633515, 10633027, 10632702, 10632436, 10632233, 10631747, 10640678, 10596370.

Airbag non-deployment VOQs: none found

Other airbag-related VOQs: 10628311, 10621901, 10546506, 10542104, 10619132, 10618301, 10541820, 10630164, 10619130, 10619133, 10538292, 10552140, 10644349, 10638403, 10637375, 10633702, 10618765, 10617657.

Unintended acceleration VOQs: none found

Fuel pump run-on VOQs: 10575894, 10615992, 10553338, 10607654, 10640951, 10639851, 10637925, 10637375, 10637368, 10636919, 10633702, 10633278, 10631928, 10640684.

Fire VOQs: none found

Smoke/thermal event VOQs: 10637171, 10592802, 10592772, 10573471, 10573426, 10561525, 10556461, 10542447, 10475785