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June 30, 2011

Mr. Bruce York, Acting Chief  
Medium & Heavy Duty Vehicles Division, NVS-214  
U.S. Department of Transportation  
National Highway Traffic Safety Administration (NHTSA)  
Office of Defects Investigation (ODI)  
Room W48-304  
1200 New Jersey Avenue SE  
Washington, D.C. 20590

Reference: NVS-214rw; PE11-009

Dear Mr. York:

Attached is Chrysler Group LLC's ("Chrysler") response to the referenced inquiry. In performing the analysis and reaching conclusions, and by providing the information contained herein, Chrysler is not waiving its claim to attorney work product and attorney-client privileged communications.

Pursuant to an agreement between Chrysler and ODI on June 24, 2011, Chrysler is submitting a limited response to include answers to Questions 1, 2, 3, 4, 9 and 12 for the subject vehicles.

Chrysler has conducted a reasonable and diligent search of its data repositories for complaints related to the alleged condition. On June 28, 2011, a summary of information relating to the subject vehicles in this investigation was presented to the Vehicle Regulation Committee, which decided to conduct a safety recall to inspect tie rod alignment and, if necessary, replace the left outer tie rod for subject vehicles built from February 14, 2008 to March 28, 2011 as well as any peer vehicles that received the cross-car linkage in service. Chrysler will provide a Part 573 Defect report to NHTSA on or before July 6, 2011.

Sincerely,

A handwritten signature in black ink that reads "David D. Dillon".  
David D. Dillon

Attachment and Enclosures

**Preliminary Statement**

On April 30, 2009 Chrysler LLC, the entity that manufactured and sold some of the vehicles that are the subject of this Information Request, filed a voluntary petition for relief under Chapter 11 of Title 11 of the United States Bankruptcy Code.

On June 10, 2009, Chrysler LLC sold substantially all of its assets to a newly formed company now known as Chrysler Group LLC. Pursuant to the sales transaction, Chrysler Group LLC assumed responsibility for safety recalls pursuant to the 49 U.S.C. Chapter 301 for vehicles that were manufactured and sold by Chrysler LLC prior to the June 10, 2009 asset sale.

On June 11, 2009, Chrysler LLC changed its name to Old Carco LLC. The assets of Old Carco LLC that were not purchased by Chrysler Group LLC, as well as the liabilities of Old Carco that were not assumed, remain under the jurisdiction of the United States Bankruptcy Court – Southern District of New York (*In re Old Carco LLC, et al.*, Case No. 09-50002).

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**Note: Unless indicated otherwise in the response to a question, this document contains information through May 2, 2011, the date the information request was received.**

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1. State, by model and model year, how many units of the subject and peer vehicles Chrysler has manufactured for sale or lease in the United States. For each vehicle provide the following:
  - a. VIN;
  - b. Make;
  - c. Model;
  - d. Model Year;
  - e. Date of manufacture;
  - f. Date warranty coverage commenced; and
  - g. The part number of the subject component installed on the vehicle as original equipment.

Provide the table in MS Access or a compatible format, entitled "PRODUCTION DATA." A pre-formatted table that provides further details regarding this submission will be emailed to you.

- A1. The subject vehicles have been limited to the "recirculating ball" steering system that is present on solid front axle applications on some Dodge Ram vehicles. Per agreement with ODI on May 4, 2011, the rack and pinion steering system present on many of the 4x2 trucks in the subject vehicle populations have been omitted in the response to this information request.

See the Model Table chart below for a listing of the model years, model designations, model descriptions and the corresponding manufacturing Chrysler assembly plants for each subject and peer vehicle.

**Model Table Chart**

Model Years:	2005	2006	2007	2008	2009	2010	2011
1500 MegaCab Pickup	none	DH6H81 DH6P81	DH6H81 DH6P81	DH6H81 DH6P81	none	none	none
2500 Pickup Truck	DH7	DH7	DH7	DH7	DH7	DJ7	DJ7
3500 Pickup Truck	DH8	D18	D18	D18	D18	D28	D28
3500 Cab Chassis	none	none	DC3, DC8	DC3, DC8	DC3, DC8	DC3, DC8	DD3, DD8
4500/5500 Cab Chassis	none	none	none	DM	DM	DM	DP

Subject Vehicles:	Crosscar Linkage System 1 with reverse pin on passenger side (limiting fore-aft rotation)
Peer Vehicle Group 1:	Haltenberger Linkage - no reverse pin limited fore - aft rotation
Peer Vehicle Group 2:	Crosscar Linkage System 2 with reverse pin on passenger side (limiting fore-aft rotation)
Note 1:	The 2008 Subject Vehicles began production with the Haltenberger linkage system
Note 2:	On Feb 14, 2011, steering linkage changed from Haltenberger system to crosscar system

The subject vehicles are the following 2008 thru 2011 MY vehicles:

- 1500 Ram Megacab pickup truck (DH6H81, DH6P81),
- 2500 Ram pickup (DH7, DJ7),
- 3500 Ram pickup truck (D18, D28), and
- 3500 Ram Cab Chassis (DC3, DC8, DD3, DD8).

The peer group 1 vehicles are the following 2005 thru 2007 MY vehicles:

- 1500 Ram Megacab pickup truck (DH6),
- 2500 Ram pickup (DH7),
- 3500 Ram pickup truck (DH8, D18), and
- 3500 Ram Cab Chassis (DC3, DC8).

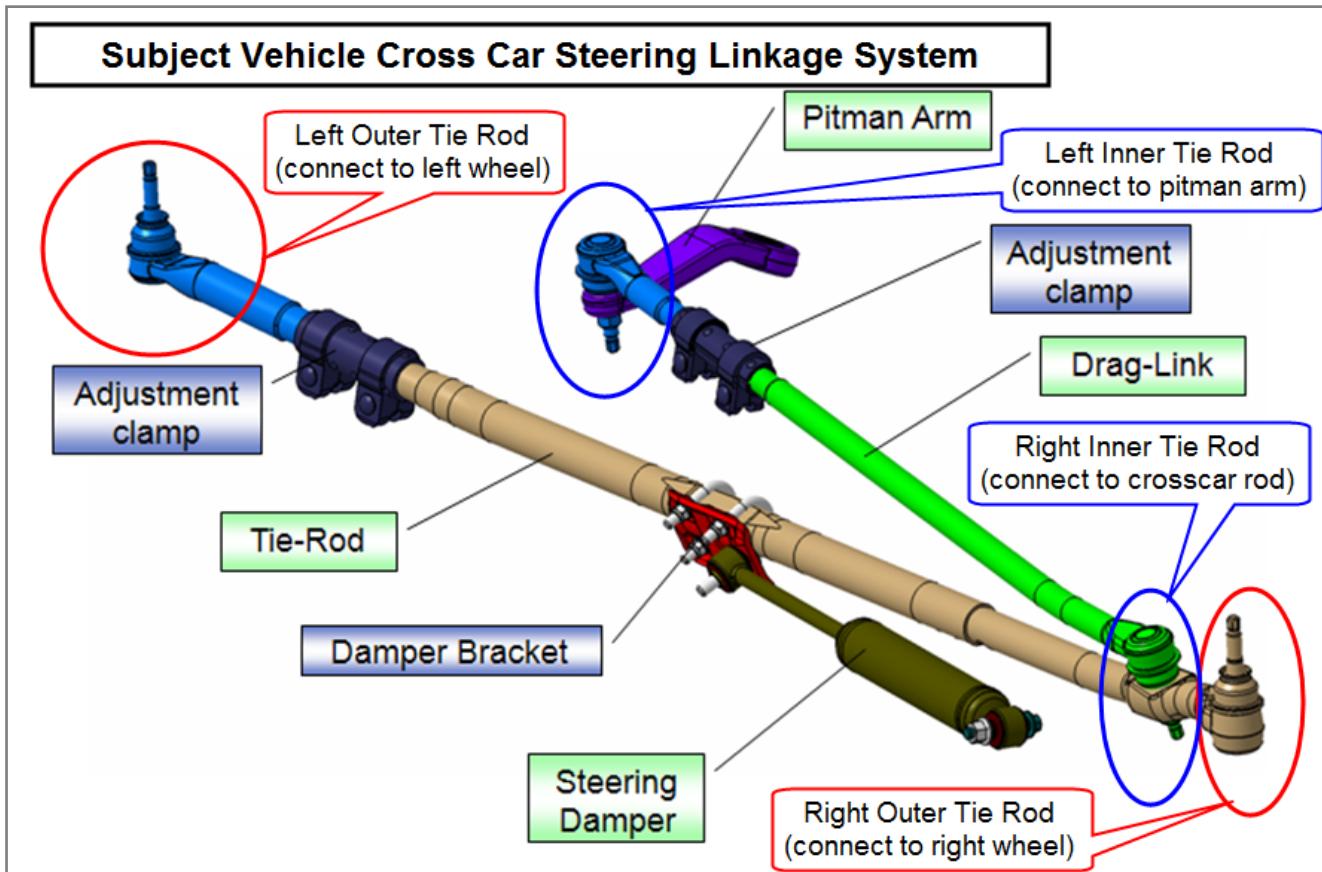
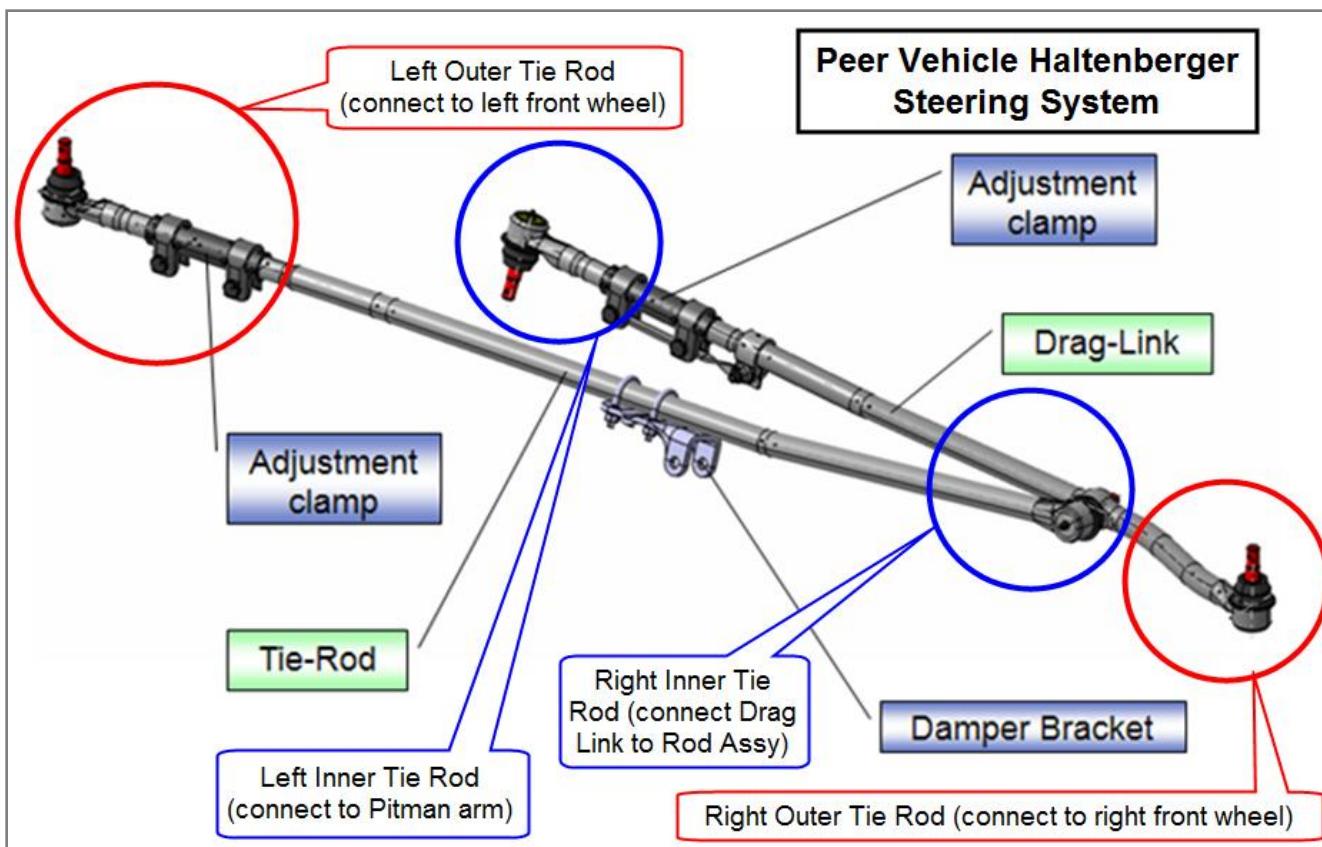
The peer group 2 vehicles are the following 2008 thru 2011 MY vehicles:

- 4500 Ram Cab Chassis (DM / DP), and
- 5500 Ram Cab Chassis (DM / DP)

The subject and peer components – the outer steering linkage tie rods and inner steering linkage tie rods, respectively – are standard equipment on the subject vehicles. The total number of subject vehicles manufactured by Chrysler for sale or lease for the US market was 232,920. There are two different steering linkage systems: most of the peer vehicles utilize a “Haltenberger” steering linkage system and most of the subject vehicles utilize a cross-car linkage system. The geometries differ between the two steering linkage designs in that the cross-car linkage configuration has both outer tie rods on the same link assembly. The Haltenberger system has the right outer tie rod on the drag link (which extends from the steering gear / pitman arm) and the left outer tie rod is on a link that extends from the drag link to the left wheel. See graphical representation below.

Note that ODI has defined the subject vehicles to include all of 2008 MY; however, the first part of the 2008 MY for the subject vehicles identified above utilize the Haltenberger system, not the subject cross car linkage system. The change to the cross car system occurred on Feb 14, 2008 in the Chrysler assembly plant. Nonetheless, Chrysler has answered the questions in this inquiry per ODI’s definition of subject vehicles.

The detailed response that lists the production data is provided in Enclosure 1 as Microsoft Access 2010 table titled “Production Data (PE11-009) Subject”. Additionally, there is a part number table provided in this Enclosure.



**2. State the number and provide copies of each of the following, received by Chrysler, which relate to, or may relate to, the alleged defect in either the subject or the peer vehicles:**

- a. Consumer / fleet complaints;
- b. Field reports;
- c. Reports involving a crash, injury, or fatality;
- d. Reports involving a fire;
- e. Property damage claims;
- f. Third-party arbitration proceedings where Chrysler is or was a party to the arbitration; and
- g. Lawsuits, both pending and closed, in which Chrysler is or was a defendant or codefendant.

For subparts “a” through “g,” state the total number of each item (e.g., consumer complaints, field reports, etc.) separately. Multiple incidents involving the same unit 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). For “f” and “g,” provide a summary of the event.

A2. The following summarizes the reports identified by Chrysler that relate to, or may relate to, the alleged condition in the subject vehicles. Chrysler has conducted a reasonable and diligent search of the normal repositories of such information.

- a. There are 377 consumer complaints (Customer Assistance Inquiry Request or CAIR) that may relate to the alleged condition for the subject vehicles, which represents 321 unique VINs.
- b. There are 8 field reports that may relate to the alleged condition for the subject vehicles, all of which are unique VINs.
- c. Within the reports of the alleged condition for the subject vehicles there are allegations of 15 crashes, 1 injury, and no fatalities.
- d. There are no reports for the subject vehicles that allege a fire.
- e. Within the reports of the alleged condition for the subject vehicles there are 7 allegations of property damage.
- f. There is one third-party arbitration proceeding involving Chrysler for the subject vehicles.
- g. There are 18 legal claims that may relate to the alleged condition for the subject vehicles, all of which represent unique VINs.

Across all complaint types there are 328 unique subject vehicle VINs that may relate to the alleged condition. Chrysler highlights the fact that the three factors listed below inflate the number of complaints and blur the distinction between the subject (cross-car) and peer vehicle (Haltenberger) steering systems.

- Many of the complaints for the subject vehicles involve inner tie rods (defined as peer components) for which Chrysler has already conducted safety recalls H36 and H46.
- Most of the vehicles referenced in the steering complaints have not been inspected by Chrysler to confirm that a broken tie rod was the cause.
- The subject vehicles built from the start of the 2008 MY up to February 14, 2008 utilize the Haltenberger steering linkage, not the cross-car linkage

Chrysler believes it is difficult to say exactly how many of the complaints provided in this response are attributable to the alleged condition for the subject vehicles. The requested report copies are provided in Enclosure 2 – Field Data.

**3. Separately, for each item (complaint, report, claim, notice, or matter) within the scope of your response to Request No. 2, state the following information:**

- a. **VIN;**
- b. **Vehicle's owner or fleet name (and fleet contact person), address, and telephone number;**
- c. **Vehicle's make, model and model year;**
- d. **Vehicle's mileage at time of incident, if known;**
- e. **Part number;**
- f. **Incident date;**
- g. **Date of manufacture;**
- h. **Indicate specific tie rod that failed (left, right or inner); and**
- i. **Date warranty coverage commenced.**

**Provide this information in MS Access or a compatible format, entitled “REQUEST NUMBER TWO DATA.” A pre-formatted table that provides further details regarding this submission will be emailed to you.**

- A3. The requested information regarding customer complaints, field reports and legal claims from Request No. 2 is provided in Enclosure 3 in a Microsoft Access 2010 table, titled “Request Number Two Data (PE11-009) - Subject”.

4. State, by make, model, and model year, a total count for all of the following categories of claims, collectively, that have been paid by Chrysler to date that relate to, or may relate to, the alleged defect in either the subject or the peer 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. VIN;
- c. Vehicle's owner or fleet name (and fleet contact person) and telephone number;
- d. Vehicle's make, model, and model year;
- e. Vehicle's build date;
- f. Warranty start date;
- g. Incident date
- h. Part number;
- i. Indicate specific tie rod that failed (left, right or inner);
- j. Vehicle's mileage at time of repair;
- k. Repairing facility's name, telephone number, and address;
- l. Labor operation number;
- m. Problem code;
- n. Replacement part number(s) and description(s);
- o. Concern stated by customer; and
- p. Comment, if any, by dealer/technician relating to claim and/or repair.

**Provide this information in MS Access or a compatible format, entitled "WARRANTY DATA." A pre-formatted table that provides further details regarding this submission will be emailed to you.**

- A4. The total number of warranty claims that may relate to the alleged condition, for the subject vehicles, are listed below.

Claim Description (may relate to alleged condition):	Number of Warranty Claims
Steering Linkage / Component Replacement (Subject Vehicles)	452

Chrysler notes that not all of the warranty claims are necessarily related to the alleged condition as there are other reasons for steering linkage / component replacements. For example, a claim for noisy linkage, which is unrelated to the alleged condition, could be binned with many of the same failure codes that could also potentially include claims that may be related to the alleged condition. Therefore, the number of responsive warranty claims may be artificially high with

regard to the alleged condition. Thus, Chrysler has not drawn conclusions regarding trends for the alleged condition in the subject vehicles based on warranty data alone.

The detailed response that lists the warranty claims and the search criteria is provided in Enclosure 4 – “Warranty Data (PE11-009) Subject Vehicles”.

The standard warranty coverage offered for the subject vehicles was 36 months / 36,000 miles. There was no extended warranty coverage for the subject or peer components, but there were service contract coverage options available for purchase through Chrysler's authorized dealers which extend coverage. Beyond standard warranty coverage, the LOPS listed in Enclosure 4B are covered by all Maximum Care service contract plans and for the first 3 months of coverage within the Certified Pre-Owned Vehicle Care options. Any service contract claims for the applicable warranty search filter criteria are included in the warranty data being provided in response to this question. Chrysler notes that owners may also have the opportunity to purchase additional service contract coverage through other third-party providers, but Chrysler does not have access to that data.

- 9. Describe all modifications or changes made by, or on behalf of, Chrysler in the design, material composition, manufacture, quality control, supply, or installation of the subject components, from the start of production to date, which relate to, or may relate to, the alleged defect in the subject vehicle. For each such modification or change, provide the following information:**
  - a. The date on which the change was incorporated into production;**
  - b. A detailed description of the change;**
  - c. The reason(s) for the change;**
  - d. The part numbers (service and engineering) of the original component;**
  - e. The part number (service and engineering) of the modified component;**
  - f. Whether the original unmodified component was withdrawn from production, inventory(s) and/or sale, and if so, when;**
  - g. When the modified component was made available as a service component; and**
  - h. Whether the modified component can be interchanged with earlier production components.**

- A9. The requested information is provided in Enclosure 9 – Subject Component Changes – CONF BUS INFO which has been submitted under separate cover to the NHTSA Chief Counsel's Office with a request for confidential treatment.**

Note that the change history of the subject vehicle steering linkage has been limited to the area of interest identified in an e-mail from ODI on May 4, 2011. Specifically, the change history is limited to those that could relate to ball stud shear or ball dislocation of the tie rod end.

**12. Furnish Chrysler's assessment of the alleged defect in the subject vehicle, including:**

- a. The causal or contributory factor(s);
- b. The failure mechanism(s);
- c. The failure mode(s);
- d. The risk to motor vehicle safety that it poses; and
- e. What warnings, if any, the operator and other people both inside and outside the vehicle would have that the alleged defect had occurred?

A12. On June 28, 2011, a summary of information relating to the subject vehicles in this investigation was presented to the Vehicle Regulation Committee, which decided to conduct a safety recall to inspect tie rod alignment and, if necessary, replace the left outer tie rod for subject vehicles built from February 14, 2008 to March 28, 2011 as well as any peer vehicles that received the cross-car linkage in service. Chrysler will provide a Part 573 Defect report to NHTSA on or before July 6, 2011.

**PE11-009**

**CHRYSLER**

**6/30/2011**

**Enclosure 1,**

**PRODUCTION DATA,**

**Part Number Table**

## PE11-009 Part Number Table (Subject & Peer Components)

(blue = peer vehicle, red = subject vehicle)

<u><b>Vehicle Description</b></u>	<u><b>Model</b></u>	<u><b>Model Yr</b></u>	<u><b>Linkage</b></u>	<b>Kit</b>			
				<u><b>Left Outer</b></u>	<u><b>Right Outer</b></u>	<u><b>Left Inner</b></u>	<u><b>Right Inner</b></u>
Dodge Ram 2500 Pickup	DH7	2005	n/a	05086146AC	05086144AC	05086143AB	05086145AC
Dodge Ram 2500 Pickup	DH6, DH7	2006	n/a	05086146AC	05086144AC	05086143AB	05086145AC
Dodge Ram 2500 Pickup	DH6, DH7	2007	n/a	05086146AC	05086144AC	05086143AB	05086145AC
Dodge Ram 2500 Pickup	DH6, DH7	2008	52122362AE	68038054AA	68038055AA	68036940AA	05086144AC
Dodge Ram 2500 Pickup	DH7	2009	n/a	68038054AB	68038055AB	68036940AB	68036726AB
Dodge Ram 2500 Pickup	DJ7	2010	52122362AF	68038054AC	68038055AC	68036940AC	68036726AB
Dodge Ram 2500 Pickup	DJ7	2011	52122362AF	68038054AC	68038055AC	68036940AC	68036726AC
Dodge Ram 3500 Pickup	DH8	2005	n/a	05086146AC	05086144AC	05086143AB	05086145AC
Dodge Ram 3500 Pickup	D18	2006	n/a	05086146AC	05086144AC	05086143AB	05086145AC
Dodge Ram 3500 Pickup	D18	2007	n/a	05086146AC	05086144AC	05086143AB	05086145AC
Dodge Ram 3500 Pickup	D18	2008	n/a	68038054AB	68038055AB	68036940AB	68036726AB
Dodge Ram 3500 Pickup	D18	2009	n/a	68038054AB	68038055AB	68036940AB	68036726AB
Dodge Ram 3500 Pickup	D28	2010	52122362AF	68038054AC	68038055AC	68036940AC	68036726AB
Dodge Ram 3500 Pickup	D28	2011	52122362AF	68038054AC	68038055AC	68036940AC	68036726AB
Dodge Ram 3500 Cab Chassis	DC3,DC8	2007	n/a	05086146AC	05086144AC	05086143AB	05086145AC
Dodge Ram 3500 Cab Chassis	DC3,DC8	2008	52122362AA	68038054AA	68038055AA	68036940AA	05086144AC
Dodge Ram 3500 Cab Chassis	DC3,DC8	2009	n/a	68038054AB	68038055AB	68036940AB	68036726AB
Dodge Ram 3500 Cab Chassis	DC3,DC8	2010	52122362AF	68038054AC	68038055AC	68036940AC	68036726AC
Dodge Ram 3500 Cab Chassis	DD3, DD8	2011	52122362AF	68038054AC	68038055AC	68036940AC	68036726AC
Dodge Ram 4500 / 5500 Cab Chassis	DM	2008	52014074AE	68045421AA	68041823AB	68045420AA	68041821AA
Dodge Ram 4500 / 5500 Cab Chassis	DM	2009	52014074AE	68045421AA	68041823AB	68045420AA	68041821AA
Dodge Ram 4500 / 5500 Cab Chassis	DM	2010	52014074AE	68045421AA	68041823AB	68045420AA	68041821AA
Dodge Ram 4500 / 5500 Cab Chassis	DP	2011	52014074AE	68045421AA	68041823AB	68045420AA	68041821AA

## PE11-009 Part Number Table (Subject & Peer Components)

### **Part Number Supercedence Chains**

Subject Vehicle - Steering Linkage	52122362AF,05086143AA,05086144AA,05086144AC,05086145AB,05086145AC,05086146AA,05086146AC,05154661AA,06505623AA
Subject Vehicle - Steering Linkage (cont'd)	52037600AB,52122362AA,52122362AB,52122362AC,52122362AD,52122362AE,52122362AG,52122370AA,52122370AB,68039930AA
Subject Vehicle - Left Outer	68038054AC,68038054AA
Subject Vehicle - Right Outer	68038055AC,68038055AA
Subject Vehicle - Left Inner	68036940AC,68036940AA,68036940AD
Subject Vehicle - Right Inner	68036726AC,68036726AA,68068152AA
* * Subject Vehicle - Right Inner 2008	05086144AC,05086144AA,05154661AA,06505623AA,52122362AA,52122362AB,52122362AC,52122362AD,52122362AE
* * Subject Vehicle - Right Inner 2008 (cont'd)	52122362AF,52122362AG,52122370AA,52122370AB,68039930AA
Peer Vehicle - Steering Linkage	n/a
Peer Vehicle - Left Outer	05086146AC,05086146AA,05154661AA,06505623AA,52122362AA,52122362AB,52122362AC,52122362AD,52122362AE
Peer Vehicle - Left Outer (cont'd)	52122362AF,52122362AG,52122370AA,52122370AB,68039930AA
Peer Vehicle - Right Outer	05086144AC,05086144AA,05154661AA,06505623AA,52122362AA,52122362AB,52122362AC,52122362AD,52122362AE
Peer Vehicle - Right Outer (cont'd)	52122362AF,52122362AG,52122370AA,52122370AB,68039930AA
Peer Vehicle - Left Inner	05086143AB
Peer Vehicle - Right Inner	05086145AC,05086145AB,05154661AA,06505623AA,52122362AA,52122362AB,52122362AC,52122362AD,52122362AE
Peer Vehicle - Right Inner (cont'd)	52122362AF,52122362AG,52122370AA,52122370AB,68039930AA
4500/5500 Peer Vehicle - Steering Linkage	52014074AE,52014074AC
4500/5500 Peer Vehicle - Left Outer	68045421AA
4500/5500 Peer Vehicle - Right Outer	68041823AB
4500/5500 Peer Vehicle - Left Inner	68045420AA
4500/5500 Peer Vehicle - Right Inner	68041821AA

PE11-009

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Enclosure 4,

Warranty Filter Criteria

## PE 11-009 Warranty Filter Criteria

### relevant LOPs

19630102	replace outer tie rod - right
19630103	replace outer tie rod - left
19630109	replace outer tie rod - both
19630110	replace inner tie rod - right
19630111	replace inner tie rod - left
19630112	replace inner tie rod - both

### relevant fault codes

6	bent
7	bind stick seize
11	broken or cracked
37	excessive wear
51	improperly installed
54	improperly assembled
FC	fastener broken or cracked
FG	fastener loose / improperly installed
K4	loose
UC	uncodeable

### replacement part numbers

05086143AA	Left Inner Tie Rod
05086143AB	Left Inner Tie Rod
05086144AB	Right Outer Tie Rod
05086144AC	Right Outer Tie Rod
05086145AA	Right Inner Tie Rod
05086145AC	Right Inner Tie Rod
05086146AB	Left Outer Tie Rod
05086146AC	Left Outer Tie Rod
52014074AE	Steering Linkage Assy
52122362AA	Steering Linkage Assy
52122362AB	Steering Linkage Assy
52122362AE	Steering Linkage Assy
52122362AF	Steering Linkage Assy
68036726AB	Right Inner Tie Rod
68036726AC	Right Inner Tie Rod
68036940AB	Left Inner Tie Rod
68036940AC	Left Inner Tie Rod
68038054AB	Left Outer Tie Rod
68038054AC	Left Outer Tie Rod
68038055AB	Right Outer Tie Rod
68038055AC	Right Outer Tie Rod
68041821AA	Right Inner Tie Rod
68041823AB	Right Outer Tie Rod
68045420AA	Left Inner Tie Rod
68045421AA	Left Outer Tie Rod
CBCCK280AA	Left Outer Tie Rod
CBFAH362	Left Inner Tie Rod