

Summary of Production Volumes

Chrysler Group notes that the production volumes for the 1993 - 1998 Jeep Grand Cherokee (ZJ) vehicles and the 1999 - 2004 Jeep Grand Cherokee (WJ) vehicles were previously indentified in Chrysler Group's October 15, 2010 submission to PE10-031, and then adjusted in the August 2, 2012 Supplemental Response to PE10-031 as follows:

| Vehicle Type                         | MY Total  |
|--------------------------------------|-----------|
| 1993 - 1998 Jeep Grand Cherokee (ZJ) | 1,506,288 |
| 1999 - 2004 Jeep Grand Cherokee (WJ) | 1,462,619 |
| Total Vehicle Volume = 2,968,907     |           |

The production volumes for the 1993 - 2001 Jeep Cherokee (XJ) and 2002 - 2007 Jeep Liberty (KJ) vehicles that were manufactured for sale or lease in the United States are as follows:

| Vehicle Type                     | MY Total  |
|----------------------------------|-----------|
| 1993 - 2001 Jeep Cherokee (XJ)   | 1,218,349 |
| 2002 - 2007 Jeep Liberty (KJ)    | 973,111   |
| Total Vehicle Volume = 2,191,460 |           |

The production volume for the 1984 - 1992 Jeep Cherokee/Wagoneer (XJ) vehicles totaled 1,029,770.

2. **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 alleged defect in the subject vehicles:**
- a. **Consumer complaints;**
  - b. **Field reports, including dealer field reports;**
  - c. **Reports involving a crash, fire, injury, or fatality, based on claims against the manufacturer involving a death or injury, and notices received by the manufacturer alleging that a death or injury was caused by a possible defect in a subject vehicle;**
  - 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 subparts “a” through “f” state the total number of each item (e.g., consumer complaints, field reports, etc.) separately. 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).**

**In addition, for items “c” through “f,” provide a summary description of the alleged problem and causal and contributing factors and Chrysler’s assessment of the problem, with a summary of the significant underlying facts and evidence including any and all photographic evidence, third-party post-crash/inspection reports, deposition materials, etc. For items “c” through “f” identify the parties to the action, as well as the caption, court, docket number, and date on which the complaint or other document initiating the action was filed, and details of the resolution of the matter.**

**Include reports in which the subject vehicle was struck in the rear by another vehicle, or the subject vehicle itself, through its own momentum or movement, struck another vehicle or object, such as a tree, pole, or bridge abutment. As used here, the term rear includes crashes in which the subject vehicle is struck by another vehicle, or strikes an object, at an angle that included the rear of the vehicle (i.e., clock points 5, 6, or 7), and is not limited to direct crashes to the rear of the subject vehicle. Fire reports where the ignition source was from other than the crash are responsive and are to be included in your response. Reports of fuel leaks or fires where no crash occurred, such as fuel leaks that occur in garages or from punctures from running over objects in the road (but unrelated to a crash), are not within the scope of this request. Also, reports in which the fuel leak or fire originated in the engine compartment area, or where the fire was caused by an electrical issue (e.g., dash wiring or seat heater) or from a non-vehicle related source (e.g., a lit cigarette, or a lit match), as opposed to a fuel leak, are also outside the scope of this request.**

- A2. The following summarizes the reports located by Chrysler Group that relate to, or may relate to, the alleged condition in the Subject Vehicles. Chrysler Group has conducted a reasonable and diligent search of records kept in the ordinary course of business for information responsive to this inquiry.
- a. There are a total of 22 customer complaints (17 unique VINs).
  - b. There are 14 field reports.
  - c. There are 54 unique reports involving a fuel leak or fire.

- d. There are no reports of alleged property damage.
- e. There are no third-party arbitration proceedings.
- f. There are 33 lawsuits (27 unique VINs) and 12 legal claims (5 unique VINs).

ODI sent Chrysler Group 15 VOQs<sup>2</sup> concerning the Subject Vehicles that it believes may be related to the inquiry. Fourteen of the VOQs reported that the vehicle was struck from the rear by another vehicle and a fuel leak or fire ensued. Chrysler Group notes that 9 of these 14 VOQs relate to lawsuits or customer complaints that are also included in the respective counts for those categories. The remaining VOQ provides insufficient information to discern whether it relates to the alleged defect as defined by NHTSA. Enclosure 3 includes Chrysler Group's summary and analysis of the VOQs. The chart below summarizes the number of reports to Chrysler Group related to the Subject Vehicles, by category:

| <b>Subject Vehicles Population 5,160,367</b>                                |                                    |                      |                            |                |                          |
|-----------------------------------------------------------------------------|------------------------------------|----------------------|----------------------------|----------------|--------------------------|
| <b>Category Description</b>                                                 | <b>Customer Complaints (CAIRs)</b> | <b>Field Reports</b> | <b>Lawsuits and Claims</b> | <b>Notices</b> | <b>Total Unique VINs</b> |
| Fire After Vehicle is Struck from Rear by Another Vehicle                   | 18                                 | 11                   | 44                         | 5              | 50                       |
| Fuel Leak After Vehicle is Struck from Rear by Another Vehicle With No Fire | 4                                  | 3                    | 1                          | 0              | 4                        |

One of the Subject Vehicles has been defined as the 1993 - 2001 Jeep Cherokee (XJ). As noted by Chrysler Group in its response to Q1, this Subject Vehicle was the continuation of a vehicle line that originated in the 1984 model year. The following summarizes the reports located by Chrysler Group that relate to, or may relate to, the alleged condition in the 1984 - 1992 Jeep Cherokee/Wagoneer (XJ). Chrysler Group has conducted a reasonable and diligent search of records kept in the ordinary course of business for information responsive to this inquiry.

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<sup>2</sup> As noted in the Opening Resumé, 2 of the 15 VOQs relate to the same incident.

- a. There are a total of 3 customer complaints (1 unique VIN).<sup>3</sup>
- b. There are no field reports.
- c. There are 9 reports involving fuel leak or fire.
- d. There are no reports of alleged property damage.
- e. There are no third-party arbitrations.
- f. There are 7 lawsuits (involving 7 unique VINs) and 1 legal claim.

The chart below summarizes the number of reports related to the 1984 - 1992 Jeep Cherokee (XJ), by category:

| <b>1984-1992 Jeep Cherokee (XJ) Population 1,029,770</b>                    |                                    |                      |                            |                |                          |
|-----------------------------------------------------------------------------|------------------------------------|----------------------|----------------------------|----------------|--------------------------|
| <b>Category Description</b>                                                 | <b>Customer Complaints (CAIRs)</b> | <b>Field Reports</b> | <b>Lawsuits and Claims</b> | <b>Notices</b> | <b>Total Unique VINs</b> |
| Fire After Vehicle is Struck from Rear by Another Vehicle                   | 3                                  | 0                    | 8                          | 0              | 9                        |
| Fuel Leak After Vehicle is Struck from Rear by Another Vehicle With No Fire | 0                                  | 0                    | 0                          | 0              | 0                        |

With respect to the incidents identified in subparts (a), (c), and (f) above that were not previously disclosed in connection with PE10-031, see Enclosure 3 for summary descriptions of the crashes involving both the Subject Vehicles and the 1984 - 1992 Jeep Cherokee/Wagoneer (XJ). Supporting back-up materials related to the causal and contributing factors for these incidents are included in Enclosure 3 to this submission. With respect to incidents involving the 1993 - 2004 Jeep Grand Cherokee that were part of Chrysler Group's submissions of October 15, 2010 and August 2, 2012, supporting back-up documents related to the causal and contributing factors were included in Enclosure 3 to those submissions.

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<sup>3</sup> The pre-1992 calendar year customer complaint legacy data is believed to be incomplete.

Chrysler Group notes that there are four new Jeep Grand Cherokee inputs (Ditlow, Hartsel, Sculfort, and Santor) that were not part of the submission or supplemental submission made to PE10-031. Summaries of those inputs and supporting back-up documents are included in Enclosure 3 to this submission. In addition, Chrysler Group has created revised summaries for three Jeep Grand Cherokee incidents (Diez, Landrum, and Wood) based on additional information received since August 2012 or on additional information requested in this information request that was not included in the initial summaries.

Among the lawsuits identified in the preceding paragraph is a class action that was filed against Chrysler Group on behalf of registered owners of 1993 - 2004 Jeep Grand Cherokee vehicles, alleging defects in the design of the vehicles' fuel systems. Plaintiffs seek a court order compelling Chrysler Group to recall the vehicles. See Enclosure 3 for the complaint related to the class action. In addition, Clarence Ditlow of the Center for Auto Safety has written four letters to Chrysler Group alleging fuel system defects in the 1993 - 2004 Jeep Grand Cherokee. Upon the receipt of the first letter, Chrysler Group created a CAIR, to which the first letter and all subsequent letters were attached. See Enclosure 3 for the CAIR and attachments, which include the letters from Clarence Ditlow, along with a responding letter from Chrysler Group. Neither the class action lawsuit nor the Ditlow letters identified incidents not already reported to Chrysler Group, nor did they provide any new or different information concerning the incidents known to Chrysler Group.<sup>4</sup>

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. **Chrysler's file number or other identifier used;**
  - b. **The category of the item, as identified in Request No. 2 (i.e., consumer complaint, field report, etc.);**
  - c. **Cause: 1) Whether the alleged defect occurred due to the failure of or damage to a subject component or 2) Chrysler's assessment of the cause of the fire or fuel leak, or 3) whether the alleged defect occurred due to an unknown, undetermined, or ambiguous causation.**
  - d. **Vehicle owner or fleet name (and fleet contact person), address, and telephone number;**
  - e. **Vehicle's VIN;**
  - f. **Vehicle's model;**
  - g. **Vehicle's model year;**
  - h. **Vehicle's mileage at time of incident;**
  - i. **Chrysler's estimate of the impact speed of the striking vehicle or object that contacted the rear of the subject vehicle;**

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<sup>4</sup> The CAIR and class lawsuit are included in the Enclosure 2 Microsoft Access 2007 table, but because these inputs are not associated with a specific event or VIN, Enclosure 2 does not contain specific vehicle information for these two inputs.