



June 18, 2013

Mr. Frank S. Borris II  
Director, Office of Defects Investigation  
Office of Enforcement  
National Highway Traffic Safety Administration  
1200 New Jersey Avenue, S.E.  
Washington, D.C. 20590

RE: NVS-212pco; EA12-005

Dear Mr. Borris:

Chrysler Group LLC (“Chrysler Group”) has received your letter of June 3 requesting a safety recall of MY 1993-1998 Jeep Grand Cherokee (ZJ), MY 1999-2004 Jeep Grand Cherokee (WJ) and Model Year 2002–2007 Jeep Liberty (KJ) vehicles (the “Subject Vehicles”) to address the risk of post-collision fires.

As we have discussed with you and your staff extensively over the past several days, most of the crashes identified in your recall request letter are high-speed, high-energy collisions. The performance of the Subject Vehicles in these severe crashes does not suggest that they contain a defect. Indeed, the resultant damage to the struck vehicles in most of these cases would not have been prevented by taking any reasonable countermeasure steps with respect to the vehicles, and would have occurred in vehicles of other makes and models. In Chrysler Group’s judgment, the Subject Vehicles do not contain a defect related to motor vehicle safety in either design or performance. Accordingly, by a letter being filed separately today, Chrysler Group will explain why it is declining your request for a safety recall to address the risks of post-collision fire in high-speed, high-energy crashes.

However, during the discussions between our staffs, we mutually identified an opportunity to incrementally improve the performance of certain of the Subject Vehicles in certain types of low-speed impacts. The purpose of this letter is to confirm Chrysler Group’s agreement to undertake a voluntary safety recall to offer owners of the Jeep Grand Cherokee (ZJ) and the Jeep Liberty (KJ) vehicles an upgrade to the rear structure of their vehicles by the addition of a trailer hitch to better manage the crash forces in such low-speed impacts.

With respect to the Jeep Grand Cherokee (WJ), Chrysler Group will contact owners and offer to inspect and, if necessary, replace aftermarket trailer hitches to ensure that any sharp edges or other puncture risks from the aftermarket mounting hardware are removed. As this latter program involves an effort to address safety risks potentially introduced by third parties, and not by our own design, this voluntary campaign will be undertaken as a customer satisfaction

notice, and not as a safety recall. Accordingly, information regarding the WJ campaign is not included in the information below.

Although Chrysler Group does not agree that the risk of fuel leakage in low-speed impacts constitutes a safety-related defect within the meaning of the federal safety laws, and has not determined that any such defect exists in the Subject Vehicles, Chrysler Group is willing to notify its customers of the safety recall for the Jeep Grand Cherokee (ZJ) and the Jeep Liberty (KJ) in voluntary compliance with the notification procedures contained in Section 577.7 of the agency's regulations, and will voluntarily provide six quarterly reports of campaign completion, consistent with Section 573.7 of the agency's regulations.

Two draft owner notification letters are enclosed for your review. The information specified in Part 573 of the agency's regulations is set forth below:

**573.6(c)(1): Manufacturer's Name, Brand Name**

Chrysler Group LLC will undertake this campaign on behalf of the manufacturers, Chrysler Corporation (ZJ), and DaimlerChrysler Corporation and DaimlerChrysler Company LLC (KJ). The brand name is Jeep.

**573.6(c)(2): Identification of Affected Vehicles**

Make	Model	Model Years	Inclusive Dates of Manufacture
Jeep	Grand Cherokee	1993-1998	1993MY Start of Production – 1998MY End of Production*
Jeep	Liberty	2002-2007	2002MY Start of Production – 2007MY End of Production*

\*Exact production dates to be supplied

**573.6(c)(2)(iv): Component manufacturer name, address, telephone number, and country of origin:**

N/A

**573.6(c)(3): Potentially Affected Vehicle Population**

Total population produced was approximately 2,490,000. However, due to the age of the affected vehicles, we are estimating the population of affected vehicles still in operation to be approximately 1,560,000 vehicles.

**573.6(c)(4): Percentage of Affected Vehicles**

100%

**573.6(c)(5): Description of Issue**

During recent discussions, ODI and Chrysler Group mutually identified an opportunity to improve incrementally the performance of the Subject Vehicles in certain types of low-speed impacts.

**573.6(c)(6): Chronology of Principal Events**

On June 3, 2013, ODI requested Chrysler Group to conduct a safety recall of certain Jeep Grand Cherokee and Liberty models to address the risk of post-collision fires, primarily resulting from high speed collisions.

Following receipt of that letter, ODI staff and Chrysler Group staff engaged in extensive discussions to understand better the information contained in the recall request letter. During those discussions, ODI and Chrysler Group staff mutually identified an opportunity to improve incrementally the performance of the vehicles identified above in certain types of low-speed impacts.

On June 18, 2013, Chrysler Group advised ODI of its decision to decline the recall request as it relates to high speed, high energy collisions, but also of the Vehicle Regulation Committee's willingness to conduct a voluntary safety recall to offer a structural improvement to certain of the vehicles, specifically the ZJ and KJ platforms, to mitigate the risks of fuel leakage in certain low-speed collisions.

**573.6(c)(7): Information Used in Determination of a Noncompliance**

N/A

**573.6(c)(8): Description of Remedy**

Chrysler Group will contact a voluntary safety recall on all affected vehicles to include the following:

- Written notification to all owners inviting them to bring in their vehicles for a free inspection of the rear structure
- For any affected vehicle that has no trailer hitch, a Chrysler trailer hitch will be installed free of charge, provided the condition of the vehicle can support proper installation.
- For any affected vehicle that has an aftermarket trailer hitch, the area surrounding the installation will be inspected for any evidence of sharp edges or other puncture risks. If any such issues are identified, a Chrysler trailer hitch will be installed free of charge, provided the condition of the vehicle can support proper installation.
- For any affected vehicle that has an original equipment trailer hitch installed, the area around the installation will be inspected and, if no installation problems are identified, the vehicle will be released. If the inspection identifies an installation issue, it will be remedied free of charge.

Chrysler has a longstanding policy and practice of reimbursing owners who have incurred the cost of repairing a problem that subsequently becomes the subject of a field action. To ensure consistency, Chrysler, as part of the owner letter, will request that customers send the original receipt and/or other adequate proof of payment to the company for confirmation of the expense.

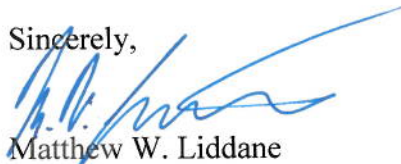
**573.6(c)(10): Dealer and Owner Communications**

Chrysler Group plans to begin notification of dealers and owners in July 2013. As noted above, two draft owner notifications are enclosed for your review.

**573.6(c)(11): Manufacturer's Campaign Number**

Chrysler has assigned recall number N45 to this action for the 1993-1998 Jeep Grand Cherokee (ZJ) vehicles. Chrysler has assigned recall number N46 to this action for the 2002-2007 Jeep Liberty (KJ) vehicles.

Sincerely,



Matthew W. Liddane

Vice President

Vehicle Concepts, Integration, Functional Sciences & Reg Affairs

Chrysler Group LLC