

David D. Dillon
Sr. Manager
Product Investigations & Campaigns

May 11, 2011

Mr. O. Kevin Vincent
Chief Counsel
National Highway Traffic Safety Administration
1200 New Jersey Ave., SE, Room W41-227
Washington, DC 20590

Re: Request for Confidential Treatment of a Voluntarily Submitted Presentation

Dear Mr. Vincent:

Chrysler Group LLC (“Chrysler”) is voluntarily submitting a presentation on CD that was presented to Mr. Scott Yon of the NHTSA Office of Defects Investigation on April 6, 2011. Based on a careful review of this presentation, Chrysler has determined that it includes information of the kind that Chrysler does not customarily disclose to the public. Therefore, Chrysler is requesting that this presentation be accorded confidential treatment pursuant to your regulations at 49 C.F.R. Part 512 and Exemption 4 of the Freedom of Information Act, 5 U.S.C. § 552(b)(4).¹

The information required by Part 512 is set forth below.

A. Description of the Information (49 C.F.R. § 512.8(a))

The business information for which confidential treatment is being sought is part of a presentation titled “NHTSA Review of FARS data May 2011 CONF BUS INFO.” This presentation contains detailed data analysis. The confidential business information can be found on Bates page # CHRYSLER 36-74, 77-80.

B. Confidentiality Standard (49 C.F.R. § 512.8(b))

This submission is subject to the confidentiality standard set forth in 49 C.F.R. § 512.15(d) for information submitted voluntarily to the agency.

¹ Chrysler has taken steps to assure that the CDs are free of any errors or defects that would prevent NHTSA from opening each file on the disc. If, however, the agency is unable to open any of the files, Chrysler respectfully requests that the agency inform Chrysler of the issue, so that Chrysler may take steps to supply NHTSA’s Office of Chief Counsel with a disc that is fully functional.

C. Justification for Confidential Treatment (49 C.F.R. § 512.8(c))

Information is voluntarily submitted if the agency did not invoke its authority to compel the submission of the information, even if the agency had such authority. *See Parker v. Bureau of Land Management*, 141 F. Supp. 2d 71, 78 n.6 (D.D.C. 2001) (“In addition to possessing the authority to compel submission, the agency must also exercise that authority in order for a submission to be deemed mandatory.”); U.S. Dept of Justice, Freedom of Information Act Guide, 2009 ed., Exemption 4, http://www.justice.gov/oip/foia_guide09/exemption4.pdf, at 279 (“Furthermore, the existence of agency authority to require submission of information does not automatically mean such a submission is ‘required’; the agency authority must actually be exercised in order for a particular submission to be deemed ‘required.’”) (footnote omitted); *id.* at 300 (noting that “the D.C. Circuit has made it clear than an agency’s unexercised authority, or mere ‘power to compel’ submission of information, does not preclude such information from being provided to the agency ‘voluntarily’”) (emphasis in original). At no time did NHTSA compel the submission of the information for which Chrysler is seeking confidential treatment.

Information submitted voluntarily should be accorded confidential treatment if it is the type of information that is not customarily disclosed by the submitter to the public. *See, e.g., Critical Mass Energy Project v. NRC*, 975 F.2d 871, 879 (D.C. Cir. 1992) (en banc). Chrysler does not disclose detailed data analysis to the public.

In addition, because manufacturers would be reluctant to provide information of this kind without confidence that it would be protected from premature disclosure, the disclosure of this information would be likely to impair the government’s interests in obtaining similar information in the future.

D. Class Determination (49 C.F.R. § 512.8(d))

The information for which confidential treatment is sought does not fit within a class determination.

E. Duration for Which Confidential Treatment is Sought (49 C.F.R. § 512.8(e))

Because the information for which confidential treatment is being sought is the kind of information that Chrysler does not anticipate ever disclosing to the public, Chrysler requests that the information be accorded confidential treatment indefinitely.

F. Contact Information (49 C.F.R. § 512.8(f))

Please direct all inquiries and responses to the undersigned at:
800 Chrysler Drive, CIMS 482-00-91
Auburn Hills, MI 48326

248-512-0087
dd28@chrysler.com

If you receive a request for disclosure of the information for which confidential treatment is being sought before you have completed your review of our request, Chrysler respectfully requests notification of the request(s) and an opportunity to provide further justification for the confidential treatment of this information, if warranted.

Sincerely,

A handwritten signature in cursive script that reads "David D. Dillon".

David D. Dillon

cc: Scott Yon

Attachment and Enclosures

Certificate in Support of Request for Confidentiality

I, David D. Dillon, pursuant to the provisions of 49 C.F.R. Part 512, state as follows:

- (1) I am Chrysler Group LLC's Senior Manager, Product Investigations & Campaigns and I am authorized by Chrysler Group LLC to execute documents on its behalf;
- (2) I certify that the information contained in the attached documents is confidential and proprietary data and is being submitted with the claim that it is entitled to confidential treatment under 5 U.S.C. 552(b)(4);
- (3) I hereby request that the information contained in the indicated documents be protected on a permanent basis;
- (4) This certification is based on the information provided by the responsible Chrysler Group LLC personnel who have authority in the normal course of business to release the information for which a claim of confidentiality has been made to ascertain whether such information has ever been released outside Chrysler Group LLC;
- (5) Based upon that information, to the best of my knowledge, information and belief, the information for which Chrysler Group LLC has claimed confidential treatment has never been released or become available outside Chrysler Group LLC, except to certain contractors of Chrysler Group LLC with the understanding that such information must be maintained in strict confidence;
- (6) I make no representations beyond those contained in this certificate and, in particular, I make no representations as to whether this information may become available outside Chrysler Group LLC because of unauthorized or inadvertent disclosure (except as stated in paragraph 5); and
- (7) I certify under penalty of perjury that the foregoing is true and correct.

Executed on this 11th day of May, 2011



David D. Dillon

1993-2004 MY Grand Cherokee Chrysler's Analysis of FARS Data

Jeep®



DODGE



RAM

Background and History

- **October 2, 2009 –NHTSA Receives original Petition to Open an Investigation**
 - **Alleged 44 crashes with fatalities where fire was the most harmful event (MHE)**
- **August 23, 2010 – NHTSA Grants Original Petition and Opens Investigation**
 - **Initial assessment of NHTSA fire database indicates:**
 - **44 crashes of all types with occupant fatalities where fire was the MHE**
 - **10 rear impact crashes with occupant fatalities where fire was the MHE**
- **November 12, 2010 – Chrysler Group LLC “Chrysler” Submits Its Response**
 - **Total of 26 unique rear impact crashes that appear responsive to the investigation**
- **December 10, 2010 –NHTSA Receives Petition #2 to Modify Investigation Criteria**
 - **Also include rollover accidents and fatalities that occurred in the bullet vehicle**
 - **Petition #2 now alleges that there would be 35 crashes with fatalities**



Initial Submission (11-12-2010)

- **Initial Submission – Data Considered**
 - **EWR (Rock Filter)**
 - **NHTSA FARS** (rear impacts with fatalities in the SUV with fire = MHE)
 - **State Databases**
 - Using sort criteria less severe than events only involving fatality
 - Larger Sample Size than FARS
 - Chose states that can:
 - Sort by tow away crashes (significant events, but not exclusive to events only involving fatality)
 - Large vehicle population (sample size)
 - Provides fire information at the vehicle level rather than the accident level



Initial Assessment - NHTSA's EWR Data

- Initial Rock Filter to assess if the subject vehicles are over-represented in fire events

Vehicles (1993-2004 MYs)	Total # Fire Events	Production Volumes	# Deaths	# Injuries
Jeep Grand Cherokee	26	2,968,914	8	21
GM Blazer*	45	2,771,241	22	45
Ford Explorer*	44	4,014,540	32	57
Toyota 4Runner*	3	1,128,360	0	3

NOTE:

- Includes ALL reports of fire
- Data is time limited in that data includes inputs since the 2nd quarter of 2003 and does not include vehicles more than ten years old

Chrysler Group examined the TREAD EWR data and confirmed that the 1993-2004 Jeep Grand Cherokee vehicles are not over-represented in the available EWR data.



11-12-2010

FARS Data Assessment



Fatality Analysis Reporting System (FARS)

Analysis of Crash Data

- FARS data 1992-2009
- Model years cover 1993-2004
- ZJ platform and WJ platform data were combined for Grand Cherokee
 - 1993-1998, corresponding to the ZJ platform
 - 1999-2004, corresponding to the WJ platform
- Vehicles used in the analyses
 - Jeep Grand Cherokee
 - Ford Explorer
 - Ford Explorer
 - Mercury Mountaineer
 - Mazda Navajo
 - Honda Passport
 - Isuzu Rodeo
 - Isuzu Trooper
 - Mitsubishi Montero (includes Montero Sport)
 - Nissan Pathfinder
 - GM SUVs / S10 Blazer
 - Chevrolet S10 and T10 Blazer
 - GMC S15 and T15 Jimmy
 - Chevrolet Trailblazer
 - GMC Envoy
 - Oldsmobile Bravada
 - Toyota 4Runner

Note: Not all models of SUVs were made in all model years used in the analyses



Fatality Analysis Reporting System (FARS)

Analysis of Crash Data (continued)

- Vehicles were identified in crash data by using VIN derived information from R.L. Polk's VINA program
- Exposure data, Years of Use (also known as Registered Vehicle Years), were calculated by summing annual registered vehicle populations using R. L. Polk's National Vehicle Population Profile (NVPP)
- Rear impact collision was defined as either initial or principal impact point at clock points 05-07
- Most Harmful Event (MHE) fire was defined as a fire in the crash and the most harmful event code for the crash was 02 (fire)
- Post Collision fire requires any fire code in a vehicle that was involved in a collision, where a collision event precedes the fire
- Rollover if any of the following conditions are true:
 - Crash Year 1992-2009, rollover equals 1 or 2 (first or subsequent event rollover)
 - Crash Year 1992-2009, first harmful event equals 1 (rollover) and vehicle forms submitted equals 1
 - Crash Year 1992-2009, most harmful event equals 1 (rollover)
 - Crash Year 2004-2009, any sequence of event code equals 1 (rollover)



Sample Incident Rate Calculation

This table contains Jeep Grand Cherokee US registration data by Model Year and Year of Registration*

Reg. Year	Model Year													Total		
	1993	1994	1995	1996	1997	1998	1999	2000	2001	2002	2003	2004	2004			
1992	15,557															15,557
1993	152,590															152,590
1994	201,380	185,063														386,443
1995	198,787	215,859	205,594													620,240
1996	192,146	206,275	247,874	213,115	417											859,827
1997	186,201	204,833	241,654	265,931	181,782											1,080,401
1998	180,411	199,728	239,394	254,131	234,468	187,003										1,295,135
1999	171,394	193,034	234,262	252,569	233,814	224,977	189,599									1,499,649
2000	163,764	185,538	225,554	245,998	229,968	224,297	258,487	200,214	1							1,733,821
2001	158,197	179,375	217,590	237,817	222,867	216,903	253,066	267,864	153,083	2						1,906,764
2002	151,247	172,498	209,726	230,680	215,784	214,271	245,484	265,797	196,984	149,021	4					2,051,496
2003	145,330	167,653	202,689	222,840	211,072	207,616	239,147	260,062	192,255	189,037	103,251	48,167				2,189,119
2004	139,625	162,542	196,462	218,004	204,903	203,983	233,767	254,016	190,969	186,545	103,478	238,700	238,700			2,332,994
2005	135,294	159,052	193,717	215,808	203,297	202,798	232,005	252,982	188,645	185,680	102,738	287,340	287,340			2,359,356
2006	126,766	151,248	186,154	208,635	198,872	198,465	225,851	246,550	184,349	180,885	100,191	281,213	281,213			2,289,179
2007	119,757	139,793	174,724	195,281	189,619	191,481	219,554	241,270	180,073	177,706	97,274	275,882	275,882			2,202,414
2008	107,796	127,157	161,633	179,930	175,855	181,922	211,157	234,336	174,475	171,644	94,248	266,164	266,164			2,086,317
2009	97,807	118,323	153,545	172,924	170,370	175,256	206,227	231,499	174,341	172,470	94,347	265,437	265,437			2,032,546
Total	2,644,049	2,767,971	3,090,572	3,113,663	2,673,088	2,428,972	2,514,344	2,454,590	1,635,175	1,412,990	695,531	1,662,903	1,662,903			27,093,848

Years of Use, or Registered Vehicle Years (RVY), found by summing registration data by model year and calendar year

Assume that for MY 1993-2004 Jeep Grand Cherokees, there are 12 incidents.
 Incident Rate = $12 / 27,093,848 * 1,000,000 = 0.44$ incidents per million years of use



Calculation of 95% Confidence Intervals

- Binomial Distribution Used
 - Trials (exposure, e.g., registered vehicle years)
 - Incidents (outcome of interest, e.g., rear collisions with MHE=fire)
 - Probability of an incident occurring per trial (estimated probability = # of incidents/# of trials)
- Calculation of Upper Limit of the Confidence Interval
 - If the number of incidents is non-zero, the upper limit is calculated as the population incident rate (probability) at which, in the given number of sample trials, the observed number of incidents (or fewer) would occur 2.5% of the time.
 - If the number of incidents is zero, the upper limit is calculated as the population incident rate (probability) at which, in the given number of sample trials the observed number of incidents (or fewer) would occur 5% of the time.
- Calculation of Lower Limit of the Confidence Interval
 - If the number of incidents is non-zero, the lower limit is calculated as the population incident rate (probability) at which, in the given number of sample trials, the observed number of incidents (or more) would occur 2.5% of the time.
 - If the number of incidents is zero, the lower limit is zero



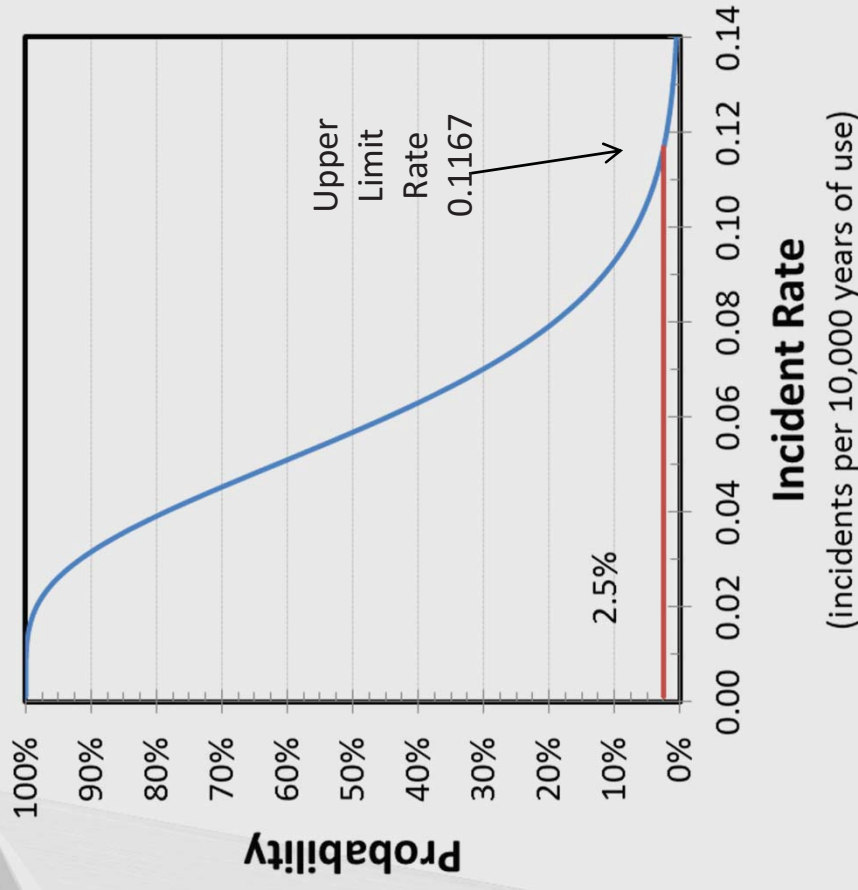
Calculation of 95% Confidence Intervals

Sample Calculation: Upper Limit

Sample calculation

- 5 incidents
- 1,000,000 years of exposure
- Estimated probability = 0.05 incidents/10,000 years of use
- The upper limit is calculated as the population incident rate at which five (5) or fewer incidents would occur 2.5% of the time in 1,000,000 years of exposure
- In this example, the upper limit of the 95% confidence interval corresponds to a rate of 0.1167 incidents per 10,000 years of use

Probability of having 5 or fewer incidents vs. incident rate

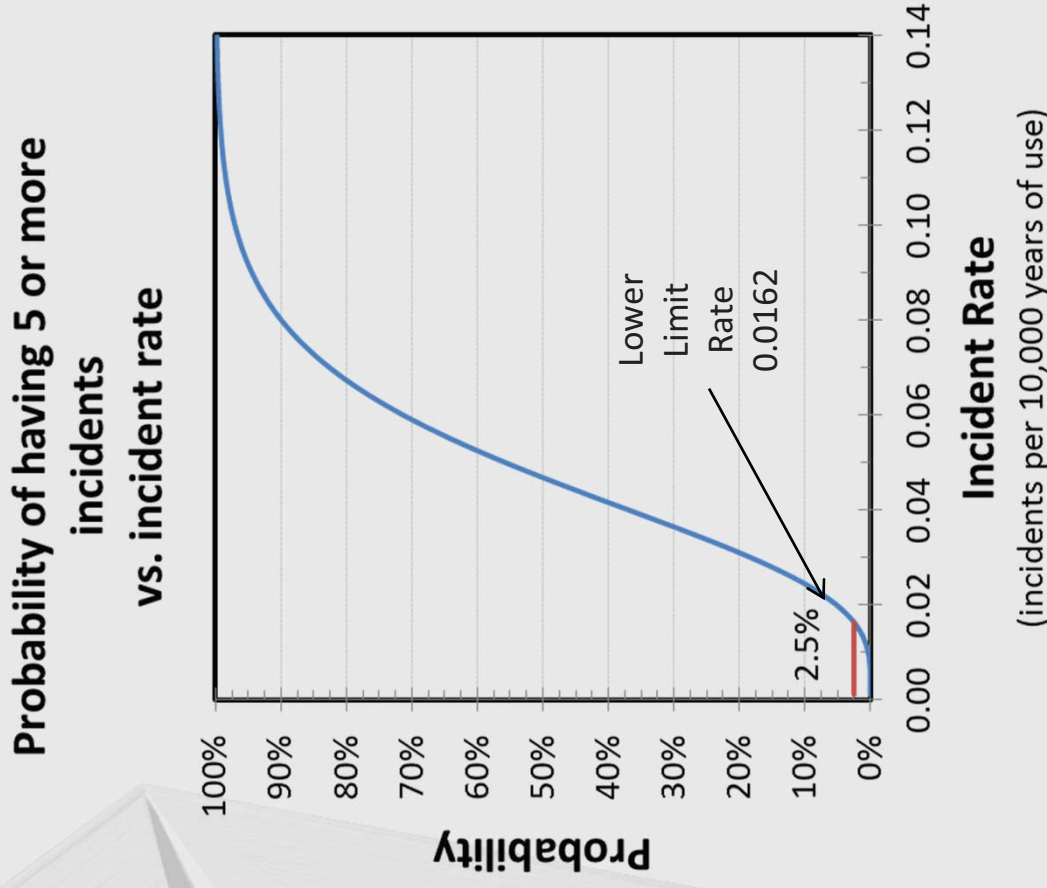


Calculation of 95% Confidence Intervals

Sample Calculation: Lower Limit

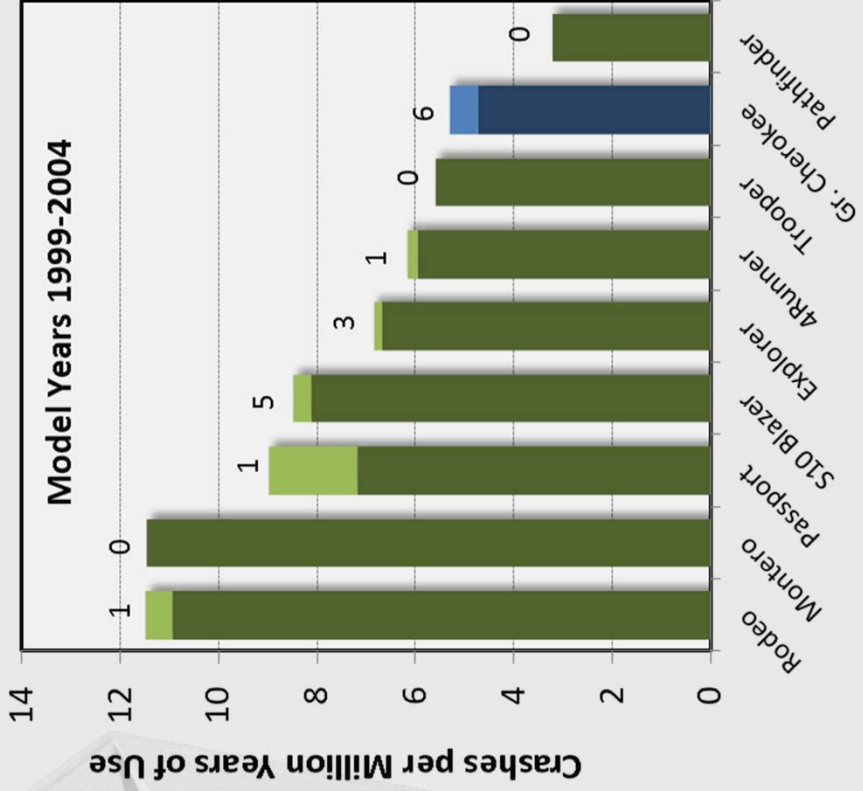
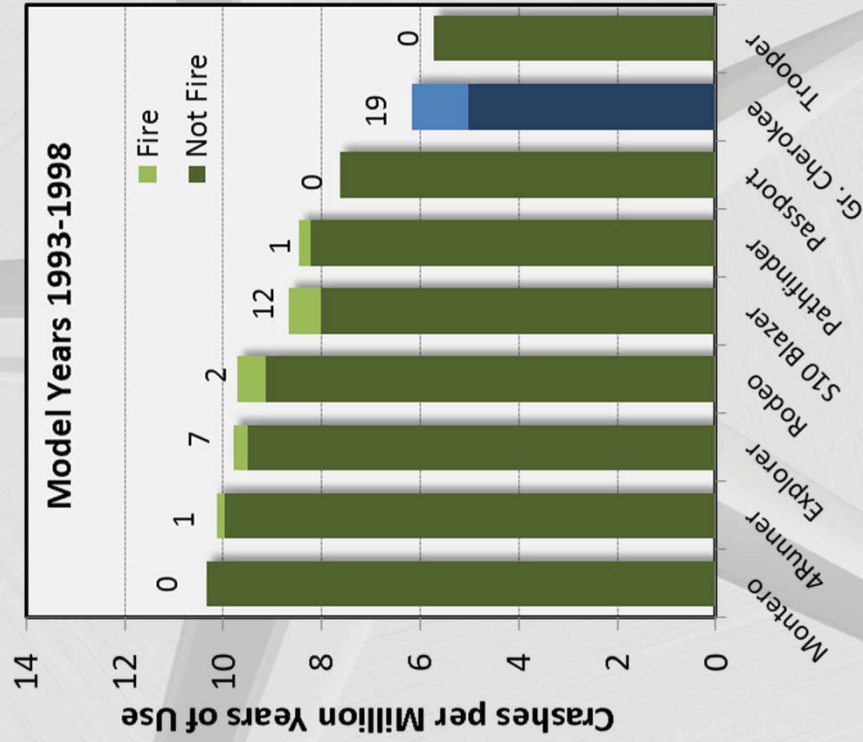
Sample calculation

- 5 incidents
- 1,000,000 years of exposure
- Estimated probability = 0.05 incidents/10,000 years of use
- The lower limit is calculated as the population incident rate at which five (5) or more incidents would occur 2.5% of the time in 1,000,000 years of exposure
- In this example, the lower limit of the 95% confidence interval corresponds to a rate of 0.0162 incidents per 10,000 years of use



Initial FARS Assessment – Rear Impacts

Assessment of all rear impacts with fatalities, where fire is not necessarily the MHE

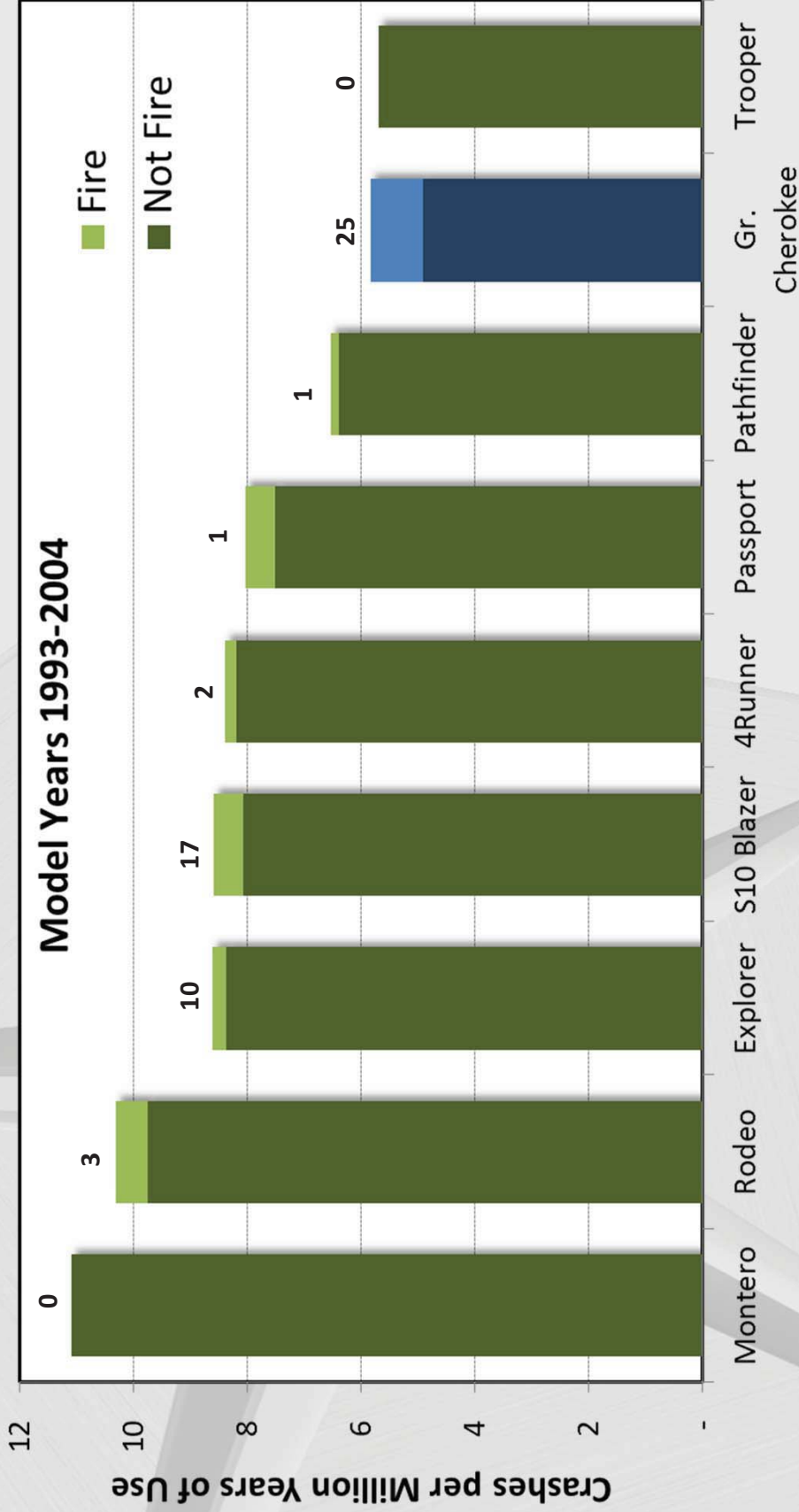


The 1993-2004 Jeep Grand Cherokee vehicles are no more likely to experience a fatality in a rear impact than peer vehicles

FARS data from 1992-2009. Registration data from RL Polk. Rates are not staggered. Includes crashes to the rear of the SUV where either initial or principal impact was coded as 5,6 or 7, with a fatality in the SUV, and where fire is not necessarily the Most Harmful Event. Explorer includes Mountaineer and Navajo. Montero includes Montero Sport. S10 Blazer includes T10 Blazer, Trailblazer, Jimmy, Envoy and Bravada. Numbers above bars are counts of rear fires.

Initial FARS Assessment – Rear Impacts

Assessment of all rear impacts with fatalities, where fire is not necessarily the MHE

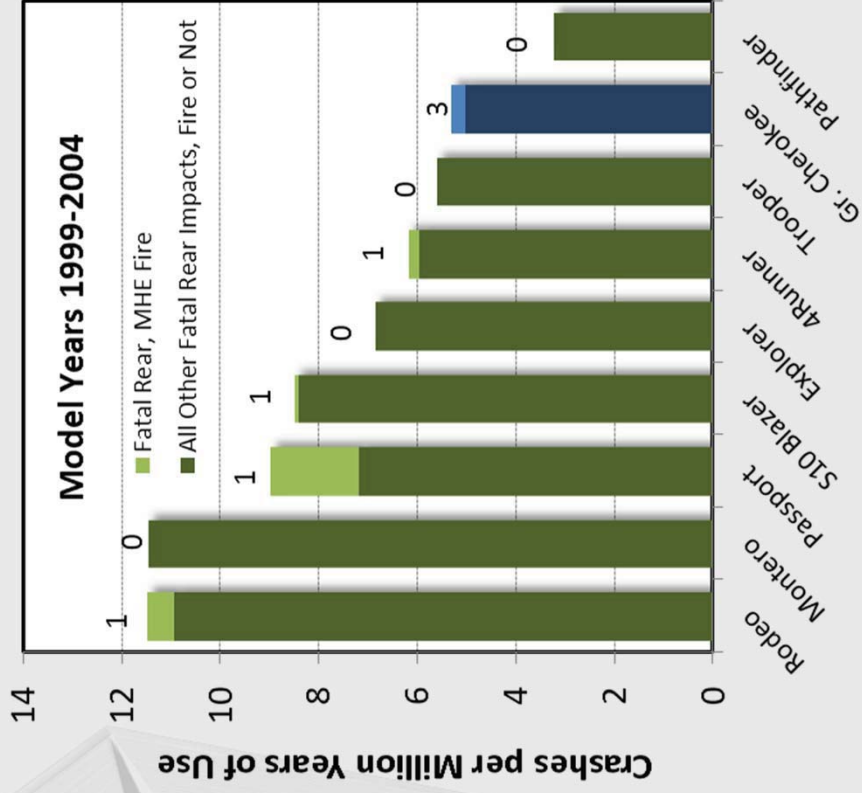
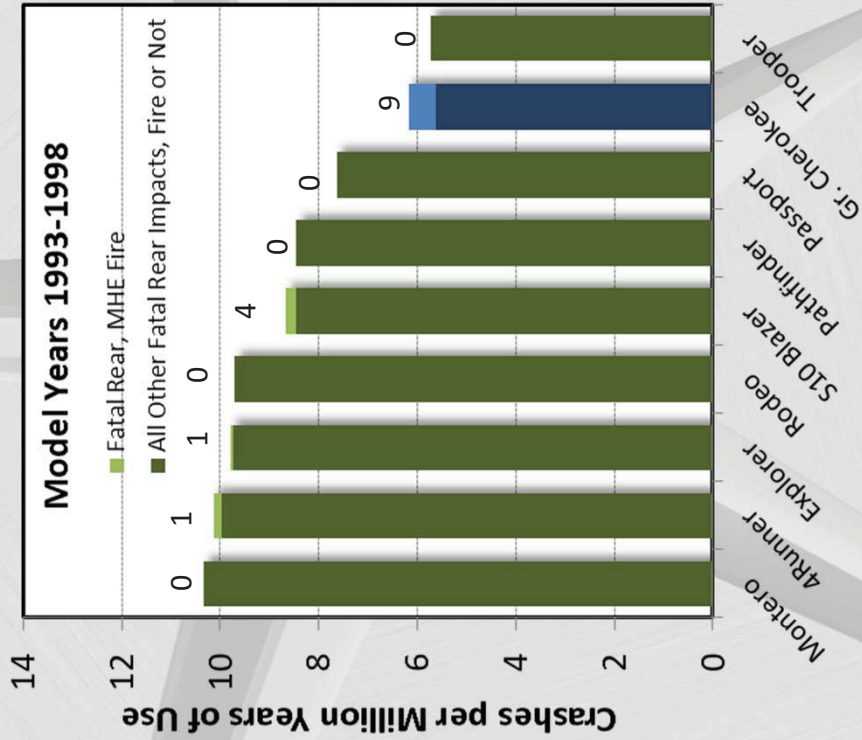


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Initial FARS Assessment – Rear Impacts

Assessment of all fatal rear impacts, identifying crashes with fire as the MHE

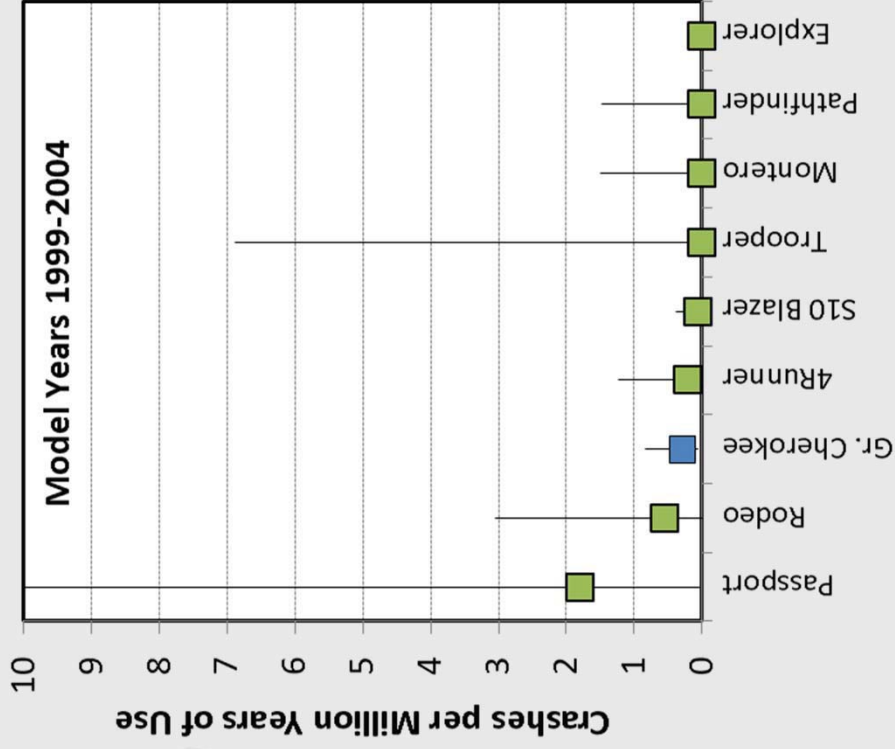
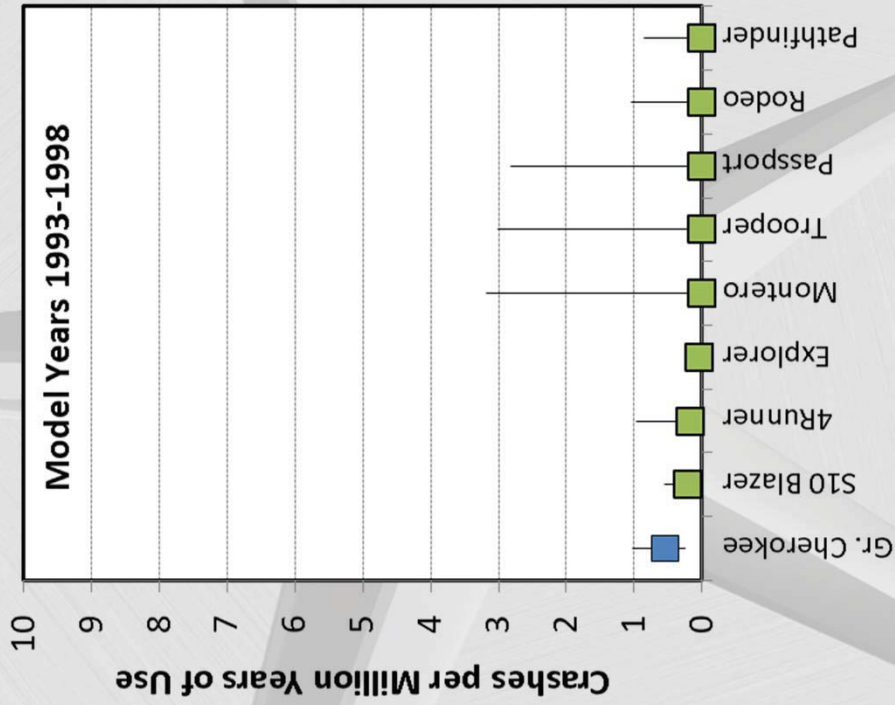


The 1993-2004 Jeep Grand Cherokee vehicles are no more likely to experience a fatality in a rear impact with a fire than the peer vehicles

FARS data from 1992-2009. Registration data from RL Polk. Rates are not staggered. Includes crashes to the rear of the SUV where either initial or principal impact was coded as 5,6 or 7, with a fatality in the SUV, and where fire is the Most Harmful Event. Explorer includes Mountaineer and Navajo. Montero includes Montero Sport. S10 Blazer includes T10 Blazer, Trailblazer, Jimmy, Envoy and Bravada. Numbers above bars are counts of rear fires.

Initial FARS Assessment – Rear Impacts with Fire as MHE

Assessment of rear impacts with fatalities and fire = MHE

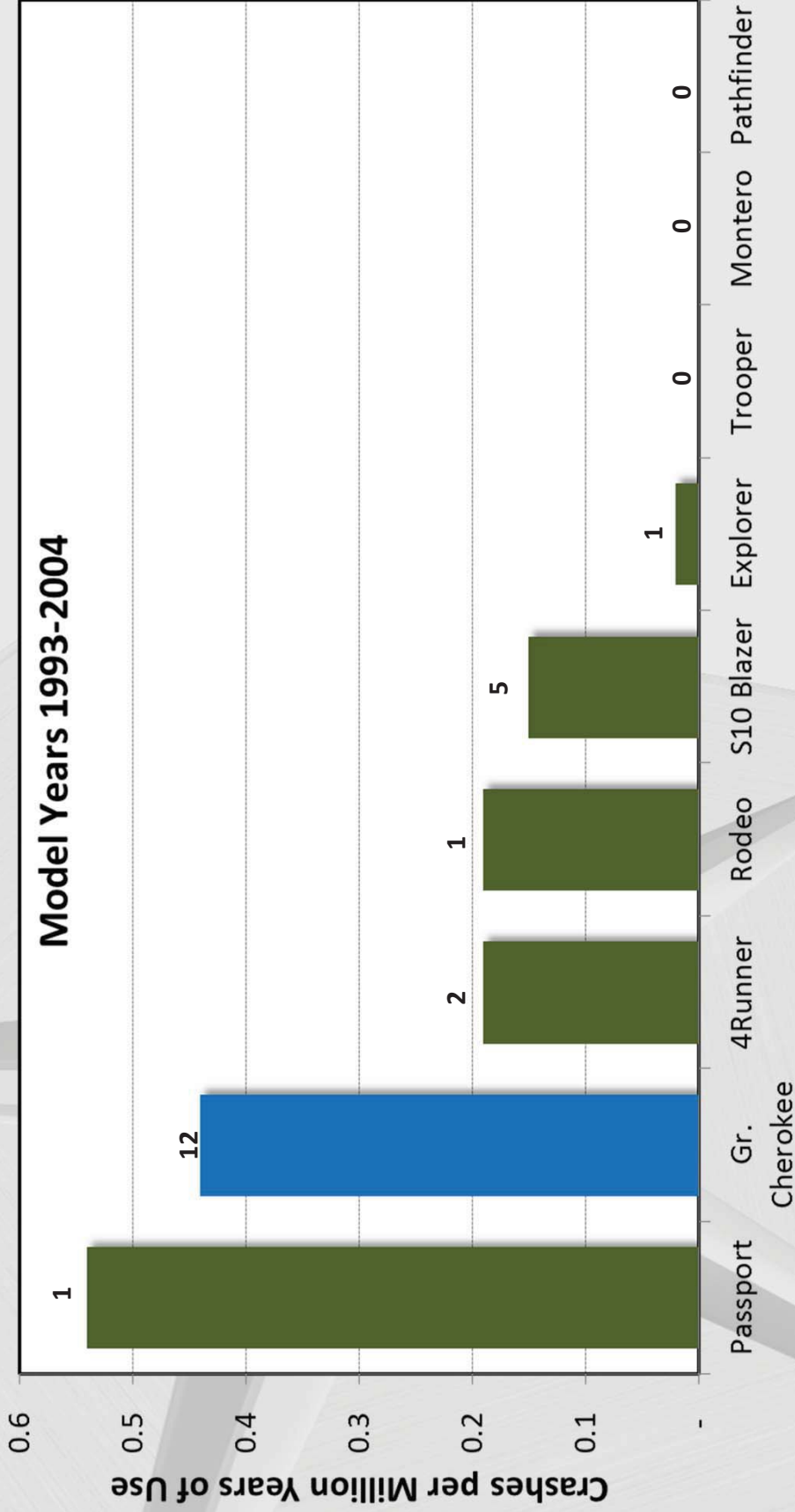


The 1993-2004 Jeep Grand Cherokee vehicles have rates of fatal rear impacts, where fire was the most harmful event, that are comparable to peer SUVs

FARS data from 1992-2009. Registration data from RL Polk. Rates are not staggered. Includes crashes to the rear of the SUV, with a fatality in the SUV, and with Most Harmful Event coded as Fire. Explorer includes Mountaineer and Navajo. Montero includes Montero Sport. S10 Blazer includes Trailblazer, Jimmy, Envoy and Bravada. Squares are the calculated rates, and the lines are the 95% confidence intervals about the rates.

Initial FARS Assessment – Rear Impacts with Fire

Assessment of rear impacts with fatalities and fire = MHE

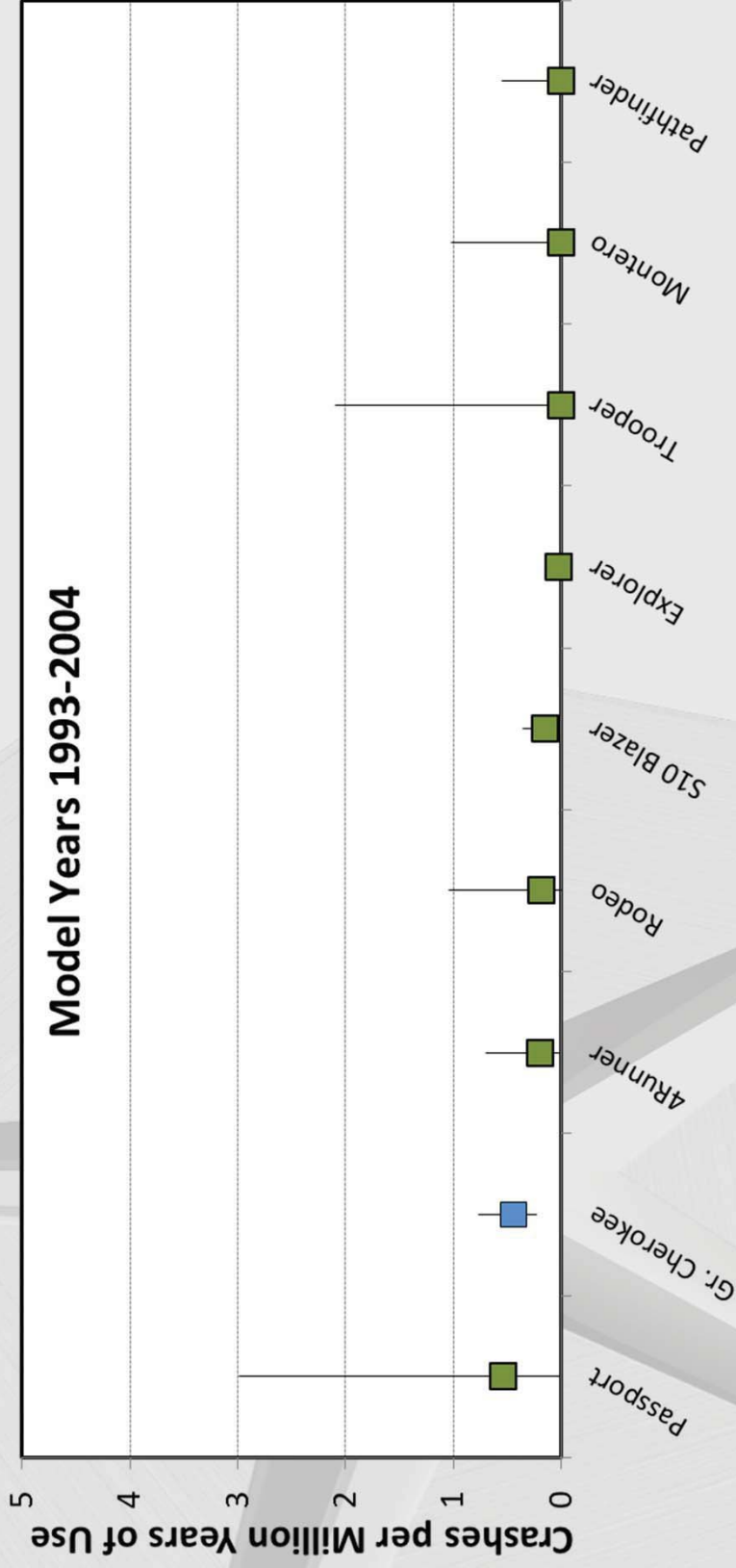


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Initial FARS Assessment – Rear Impacts with Fire

Assessment of rear impacts with fatalities and fire = MHE



The 1993-2004 Jeep Grand Cherokee vehicles have rates of fatal rear impacts, where fire was the most harmful event, that are comparable to peer SUVs

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Chrysler's Assessment of the NHTSA FARS Data

Key Takeaways:

- Chrysler's assessment of FARS data for calendar years 1992-2009 provides empirical evidence that rear end collisions with a fatality in the SUV, where fire = MHE, are extremely rare for the subject and peer vehicles.
- More importantly, the analysis of FARS incidents demonstrates that the 1993-2004 Jeep Grand Cherokee vehicles are at no greater risk of fatal rear end collisions, where fire = MHE, than peer vehicles.



11-12-2010

State Data Assessment



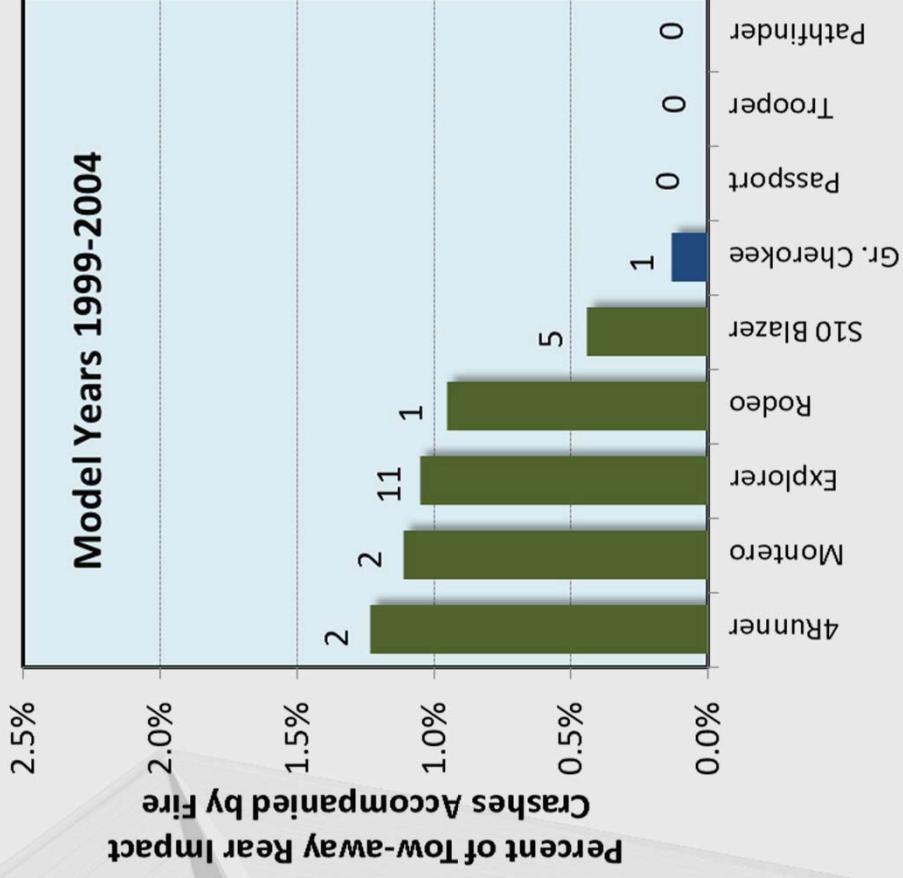
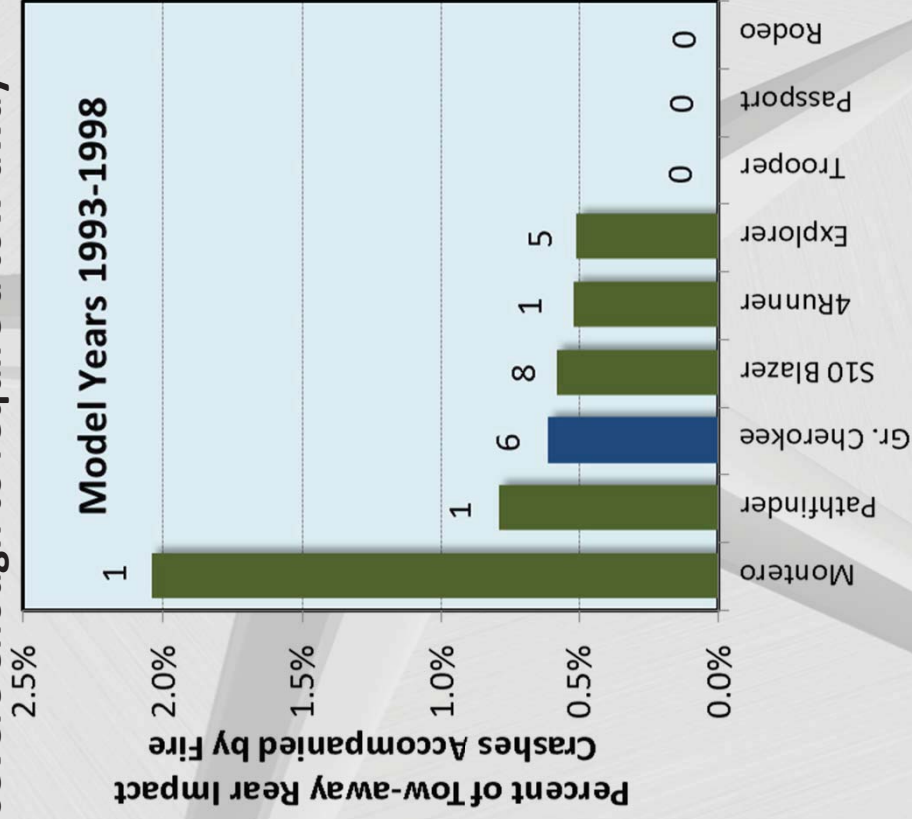
State Accident Data Analysis

- **Chrysler also analyzed multiple State crash databases**
 - Enables assessment to also include less severe events rather than just those that involved a fatality
 - Enables a much larger Sample Size than FARS assessment
 - Analysis includes States that:
 - Can sort by tow away crashes (significant events, but not exclusive to events only involving fatality)
 - Have large vehicle population (sample size)
 - Can provide fire information at the vehicle level rather than the accident level



State Crash Data Analysis - Illinois

Illinois State crash data analysis included over 7,400 rear impact events severe enough to require a tow-away

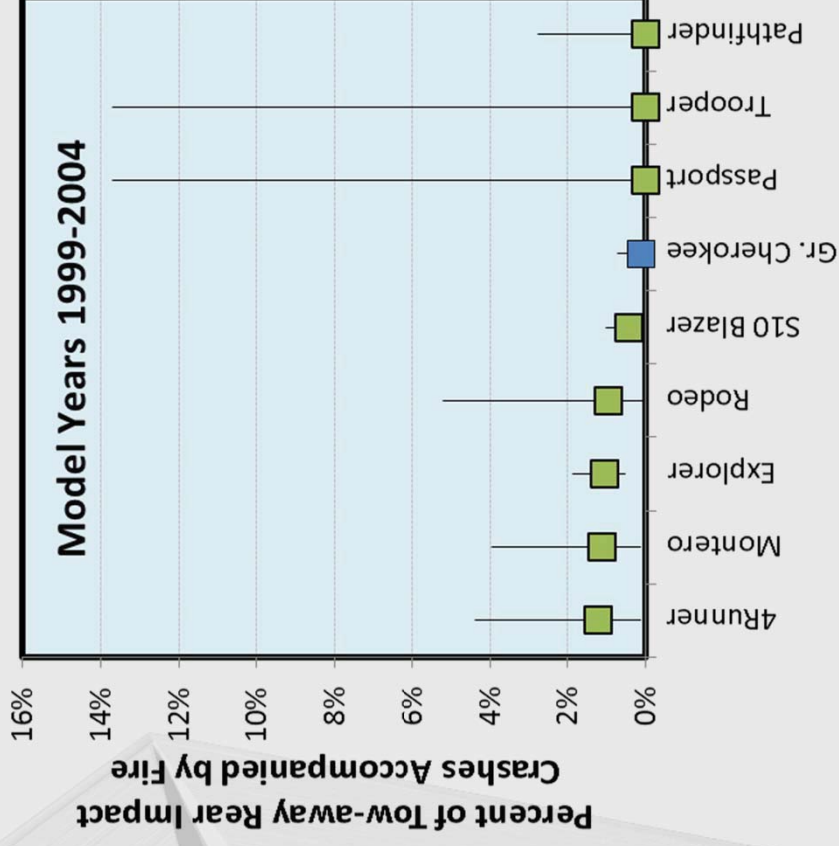
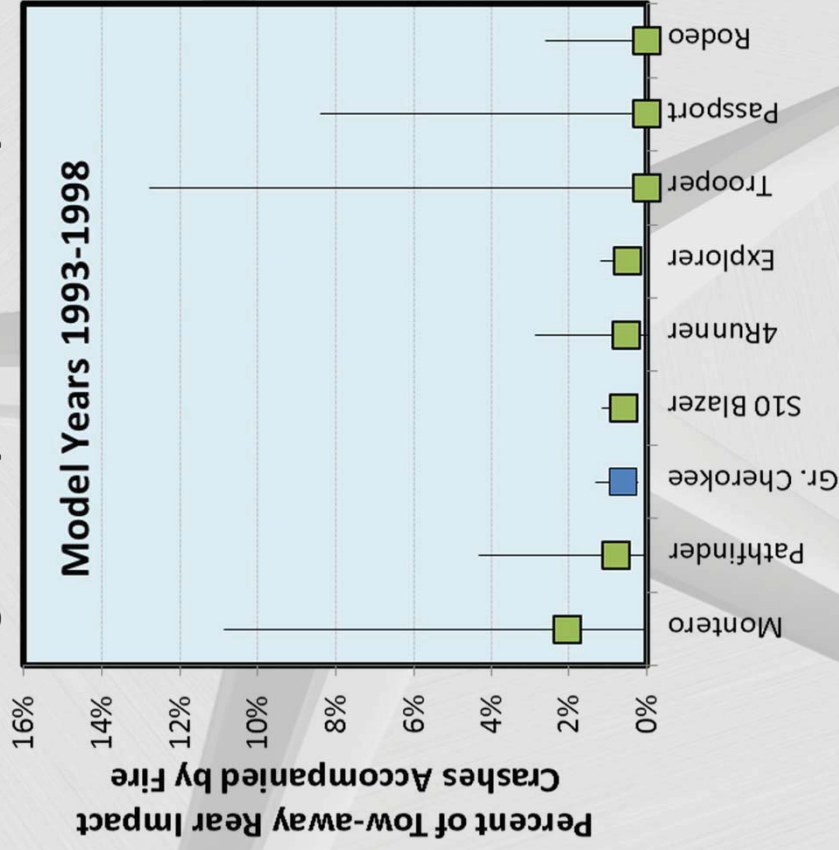


The 1993-2004 Jeep Grand Cherokee vehicles are no more likely to experience a fire in a rear impact crash than the peer vehicles

Illinois State data from 2000-2008. Includes crashes where initial impact to SUV was to the rear, and SUV required towing post-collision. Explorer includes Mountaineer and Navajo. Montero includes Montero Sport. S10 Blazer includes Trailblazer, Jimmy, Envoy and Bravada. Numbers above bars are counts of fire-involved rear impact crashes.

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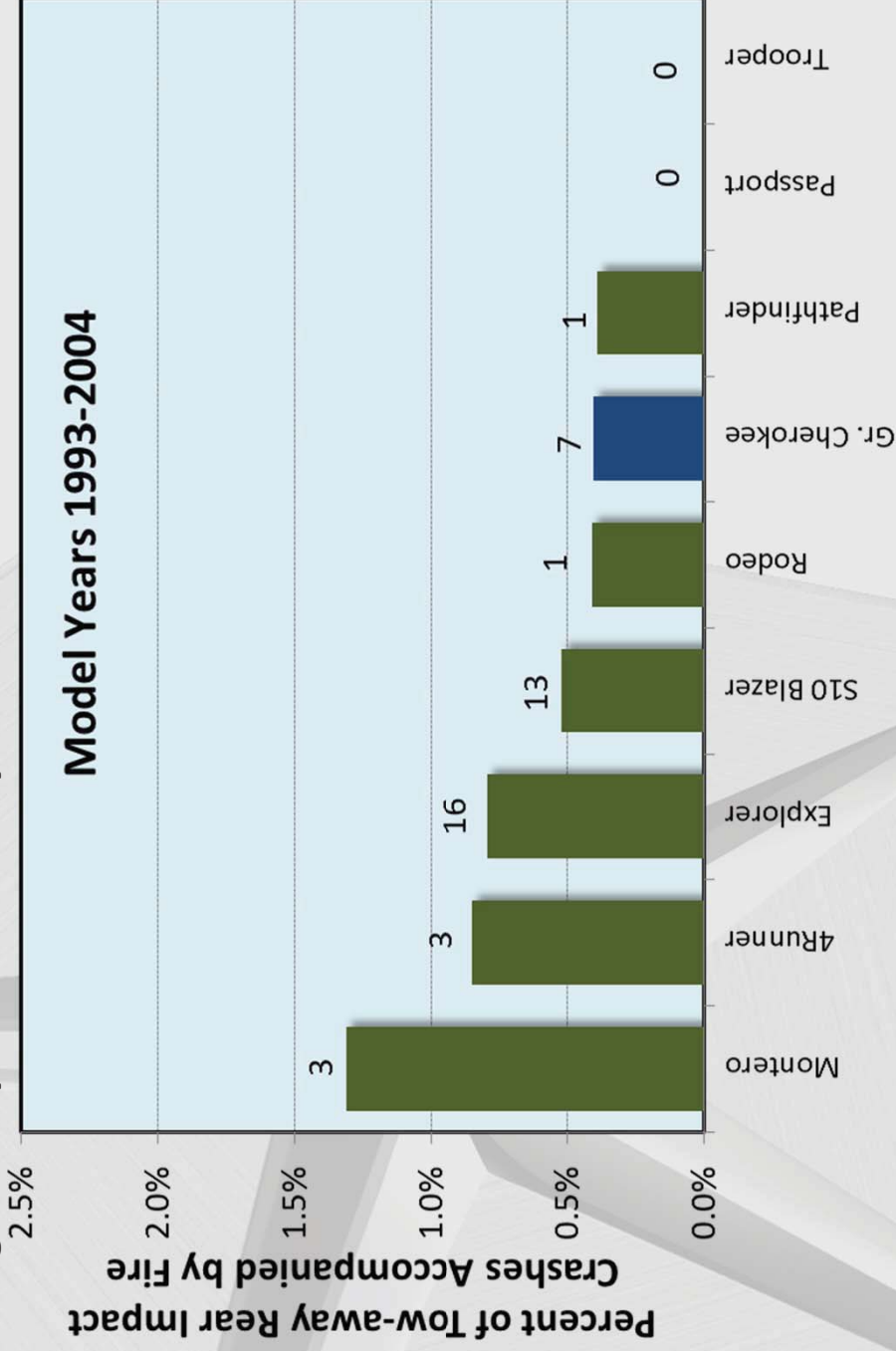


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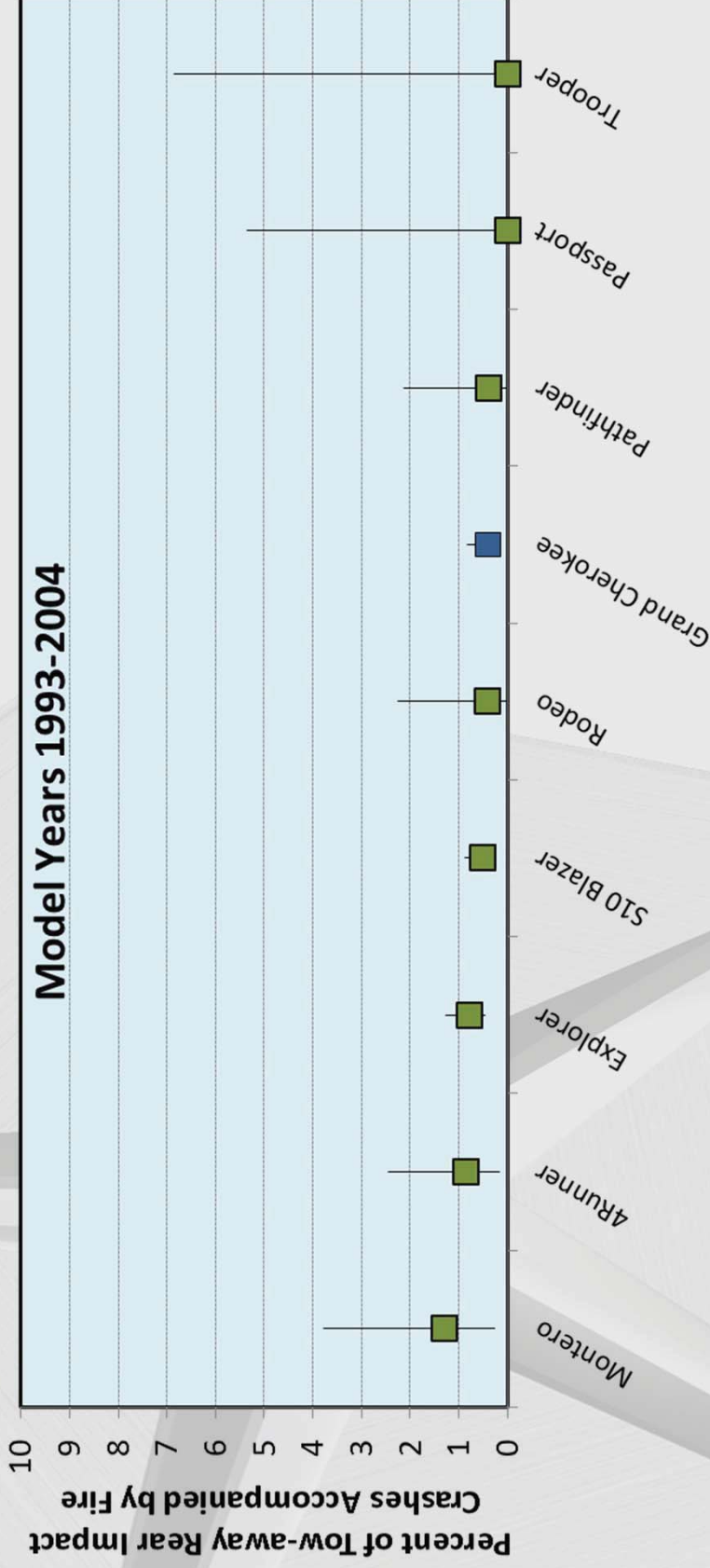


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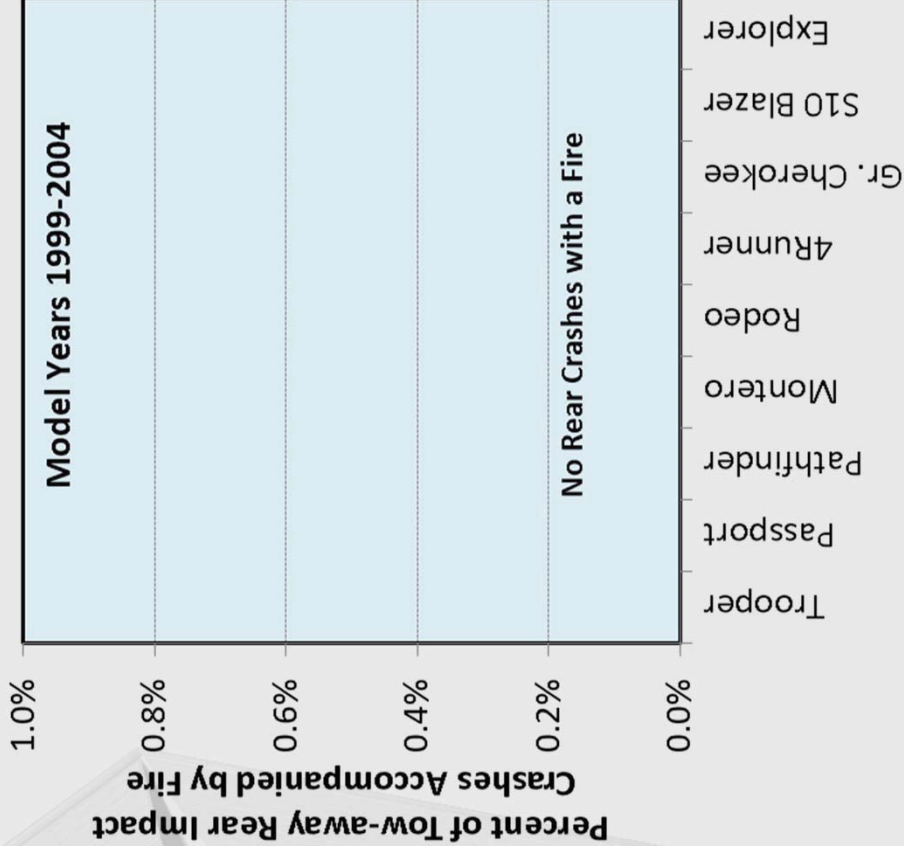
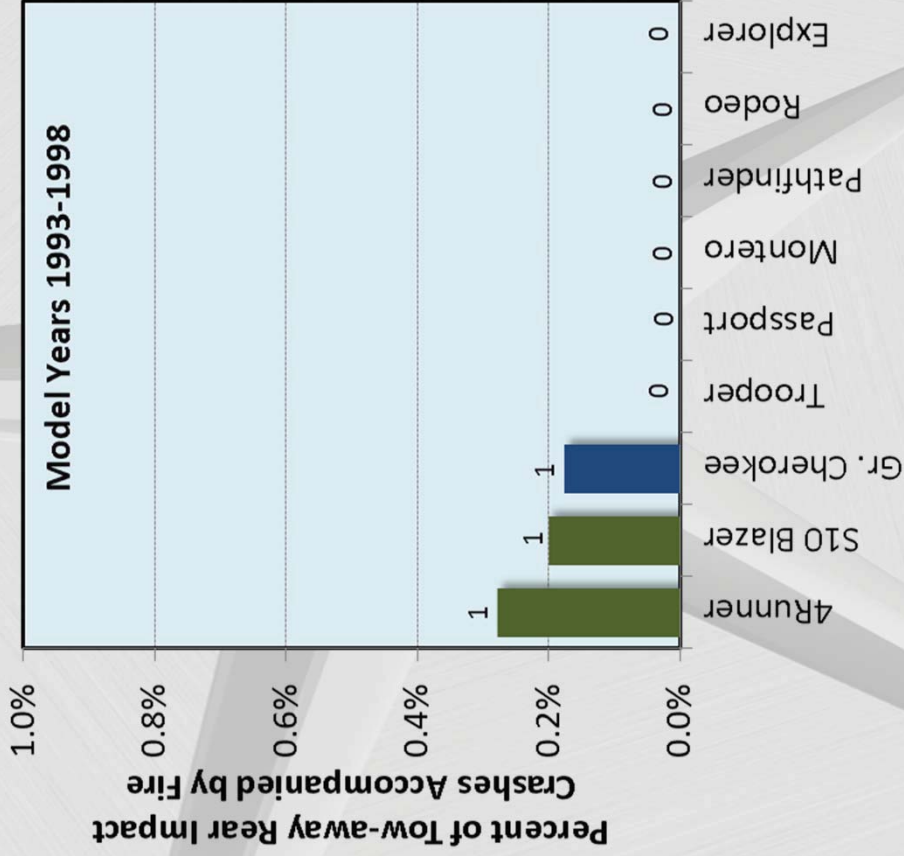
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State Crash Data Analysis - Florida

Florida State crash data analysis included over 6,000 rear impact events severe enough to require a tow-away

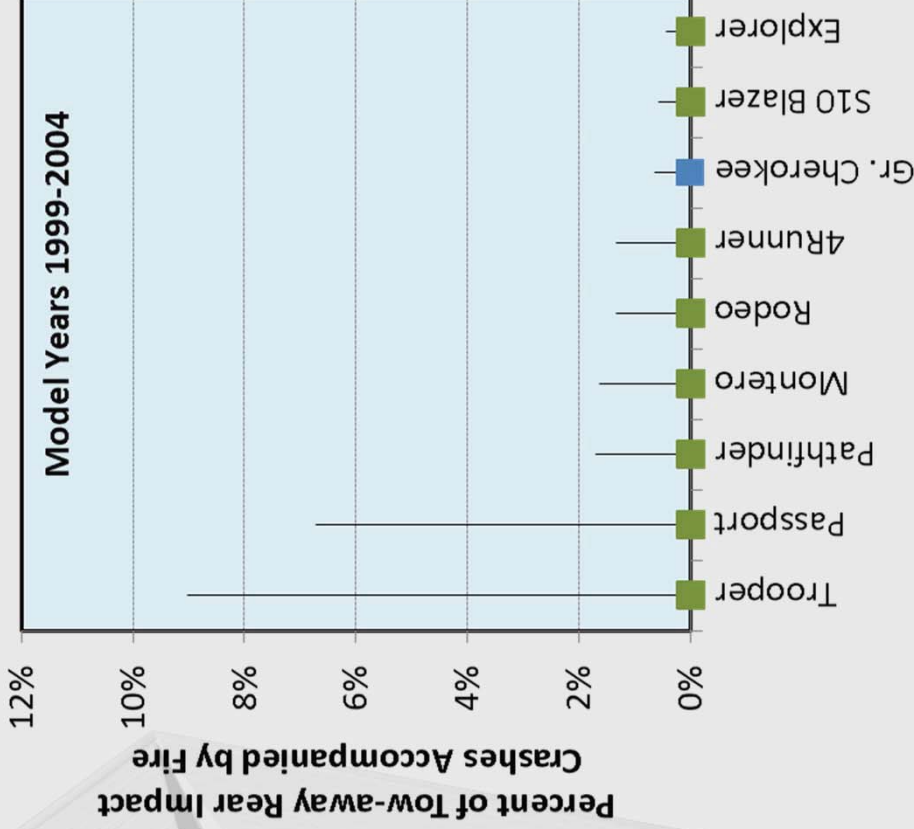
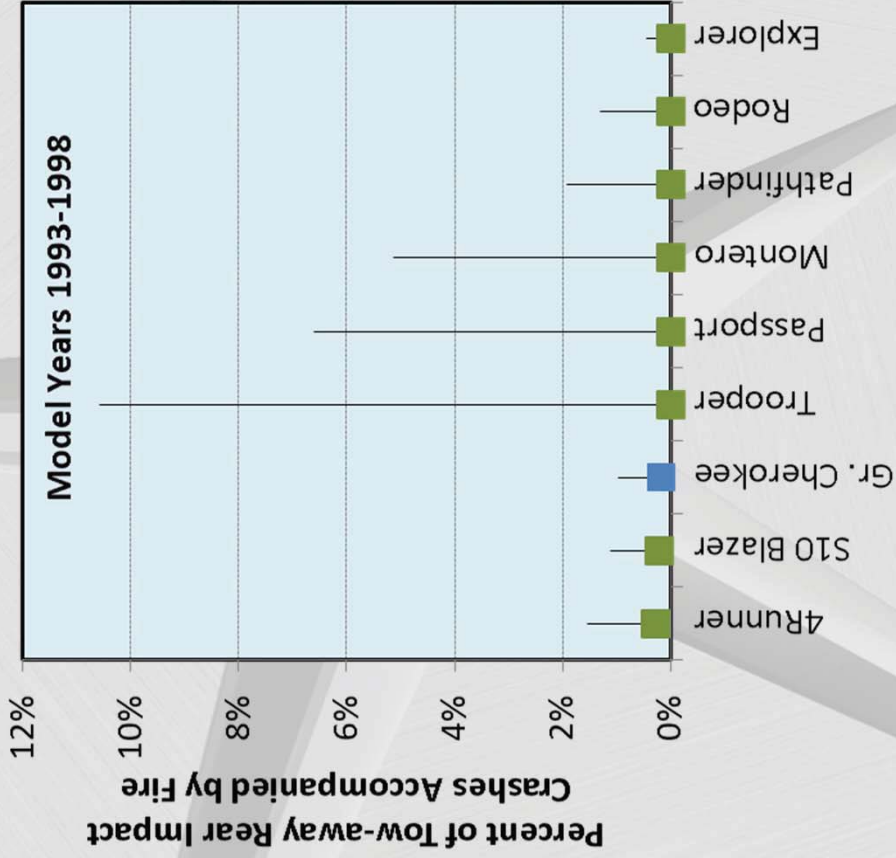


The 1993-2004 Jeep Grand Cherokee vehicles are no more likely to experience a fire in a rear impact crash than the peer vehicles

Florida State data from 2002-2008. Includes crashes where initial impact to SUV was to the rear, and SUV required towing post-collision. Explorer includes Mountaineer and Navajo. Montero includes Montero Sport. S10 Blazer includes T10 Blazer, Trailblazer, Jimmy, Envoy and Bravada. Numbers above bars are counts of fire-involved rear impact crashes. Grand Cherokee fire is crash #72772419, coded as fire in FARS, but not in Florida.

State Crash Data Analysis - Florida

Florida State crash data analysis included over 6,000 rear impact events severe enough to require a tow-away

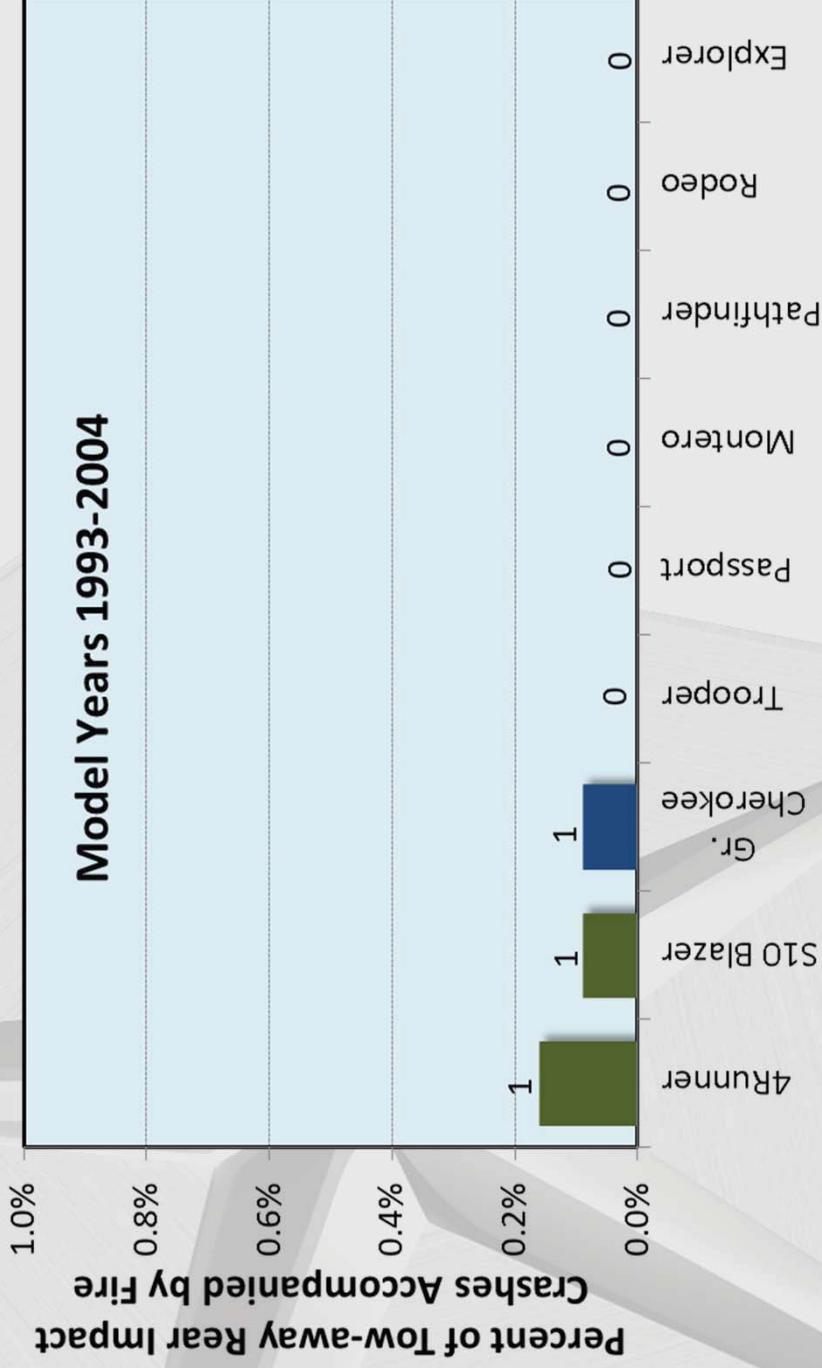


The 1993-2004 Jeep Grand Cherokee vehicles are no more likely to experience a fire in a rear impact crash than the peer vehicles

Florida state data from 2002-2008. Includes crashes where initial impact to SUV was to the rear, and SUV required towing post-collision. Explorer includes Mountaineer and Navajo. Montero includes Montero Sport. S10 Blazer includes Trailblazer, Jimmy, Envoy and Bravada. Squares are the calculated percentages, and the lines are the 95% confidence intervals about the percentages. Grand Cherokee fire is crash #7272419, coded as fire in FARS, but not in Florida.

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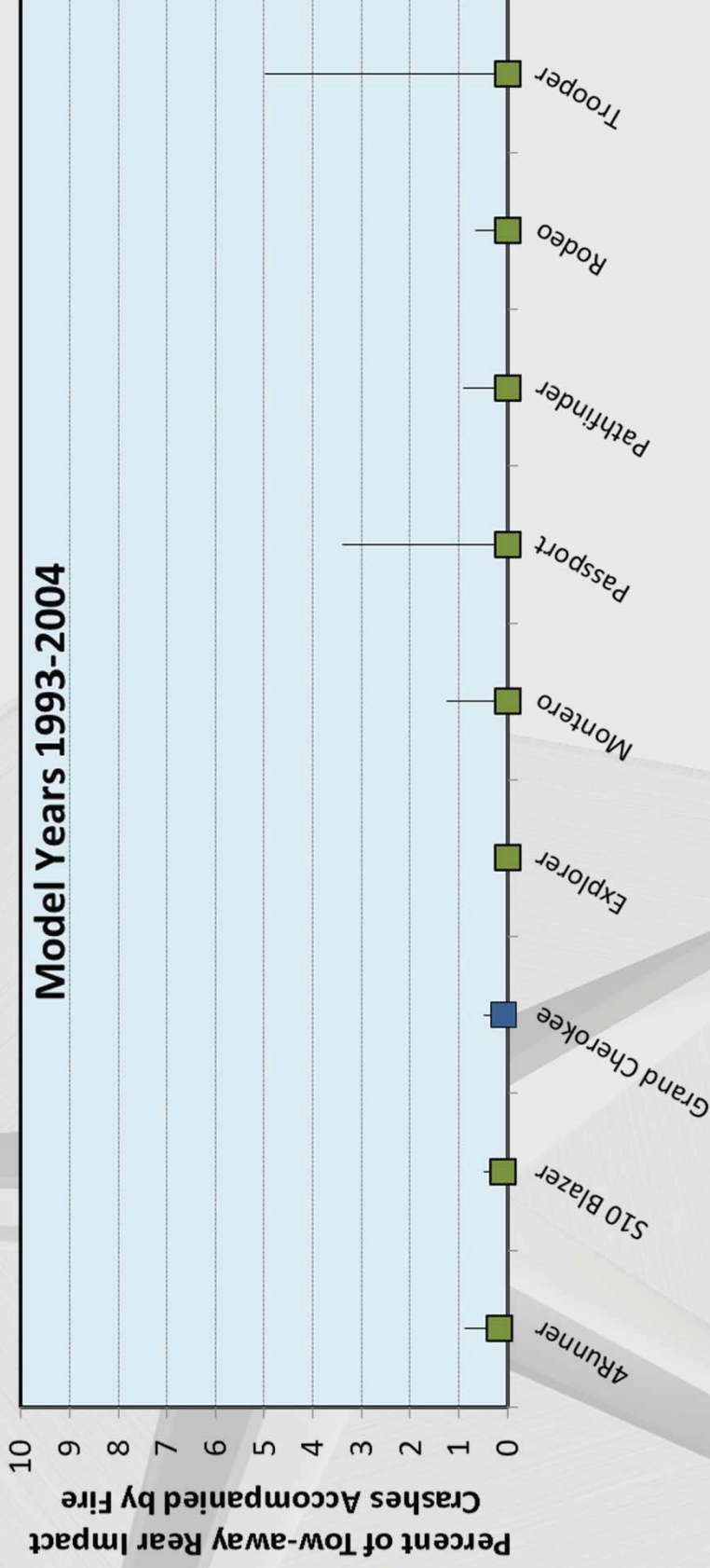


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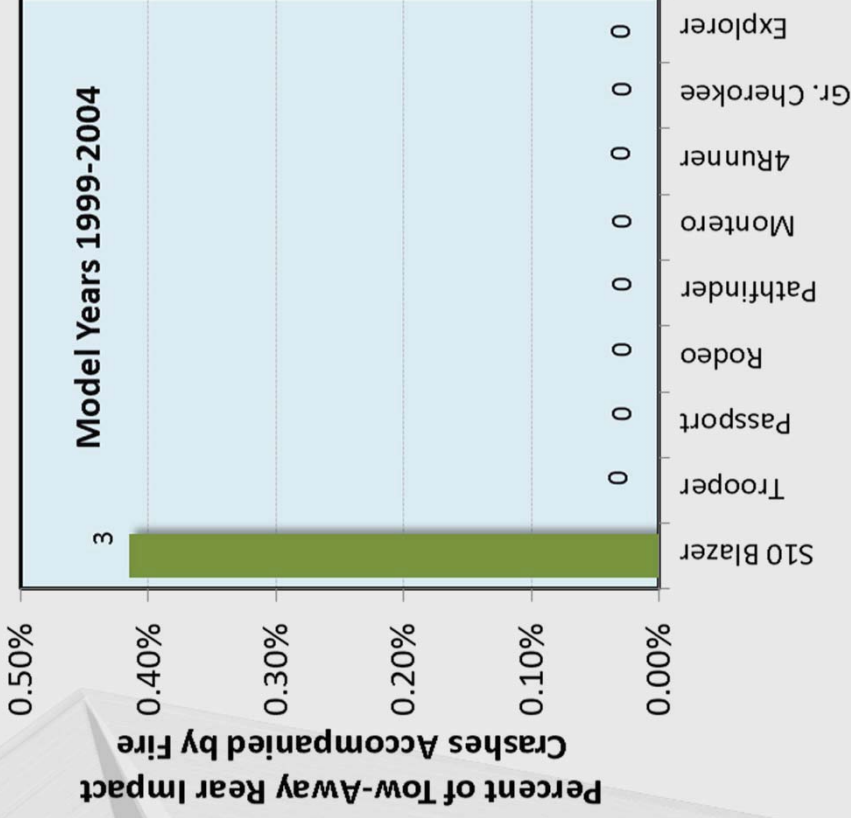
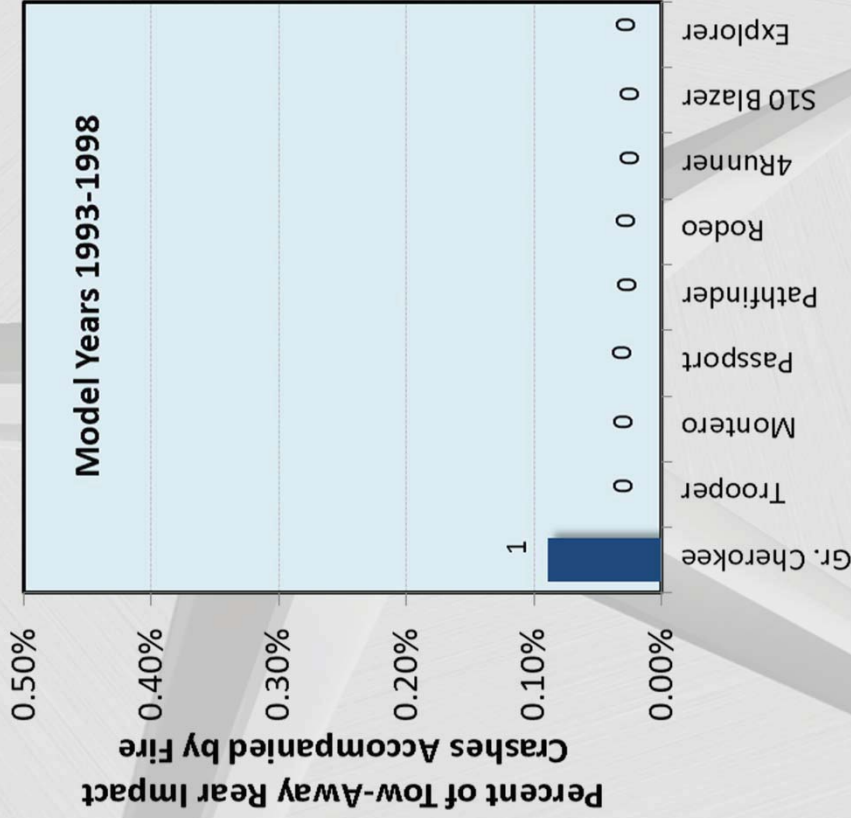


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State Crash Data Analysis – North Carolina

North Carolina State crash data analysis included over 7,700 rear impact events severe enough to require a tow-away

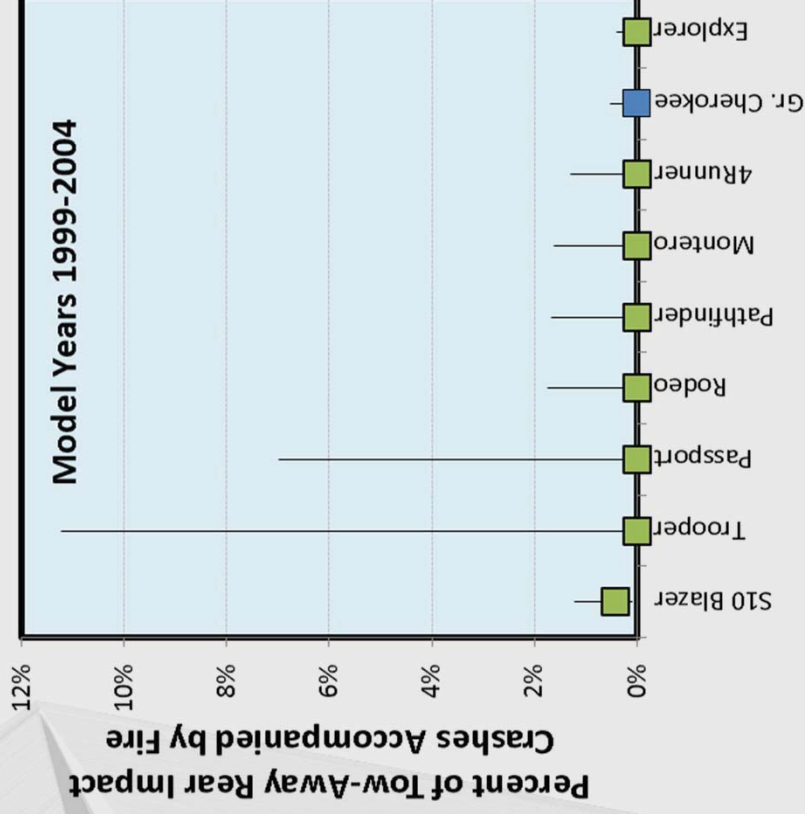
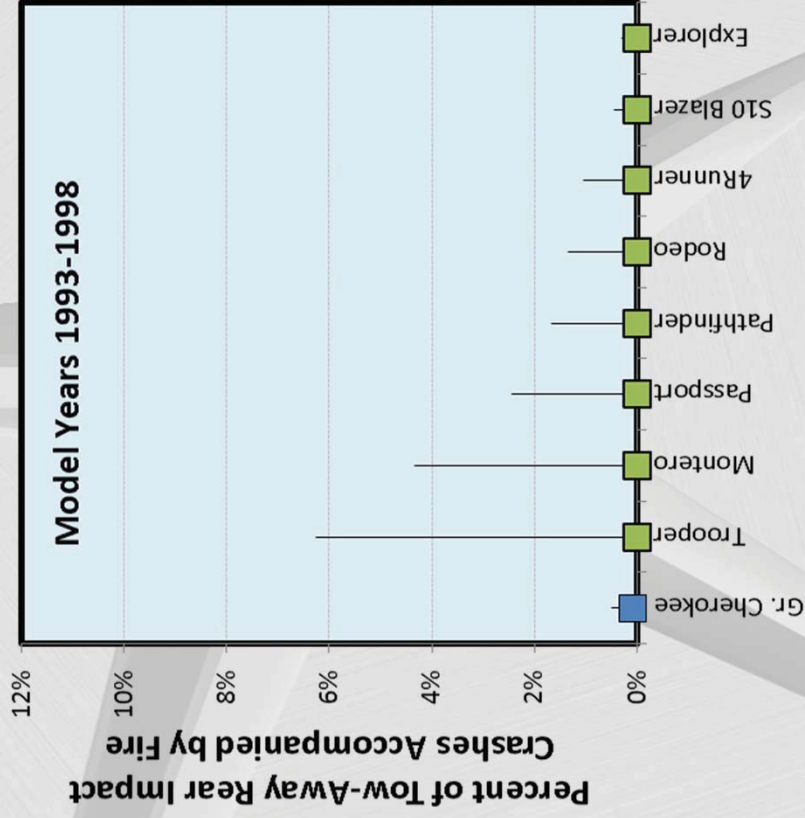


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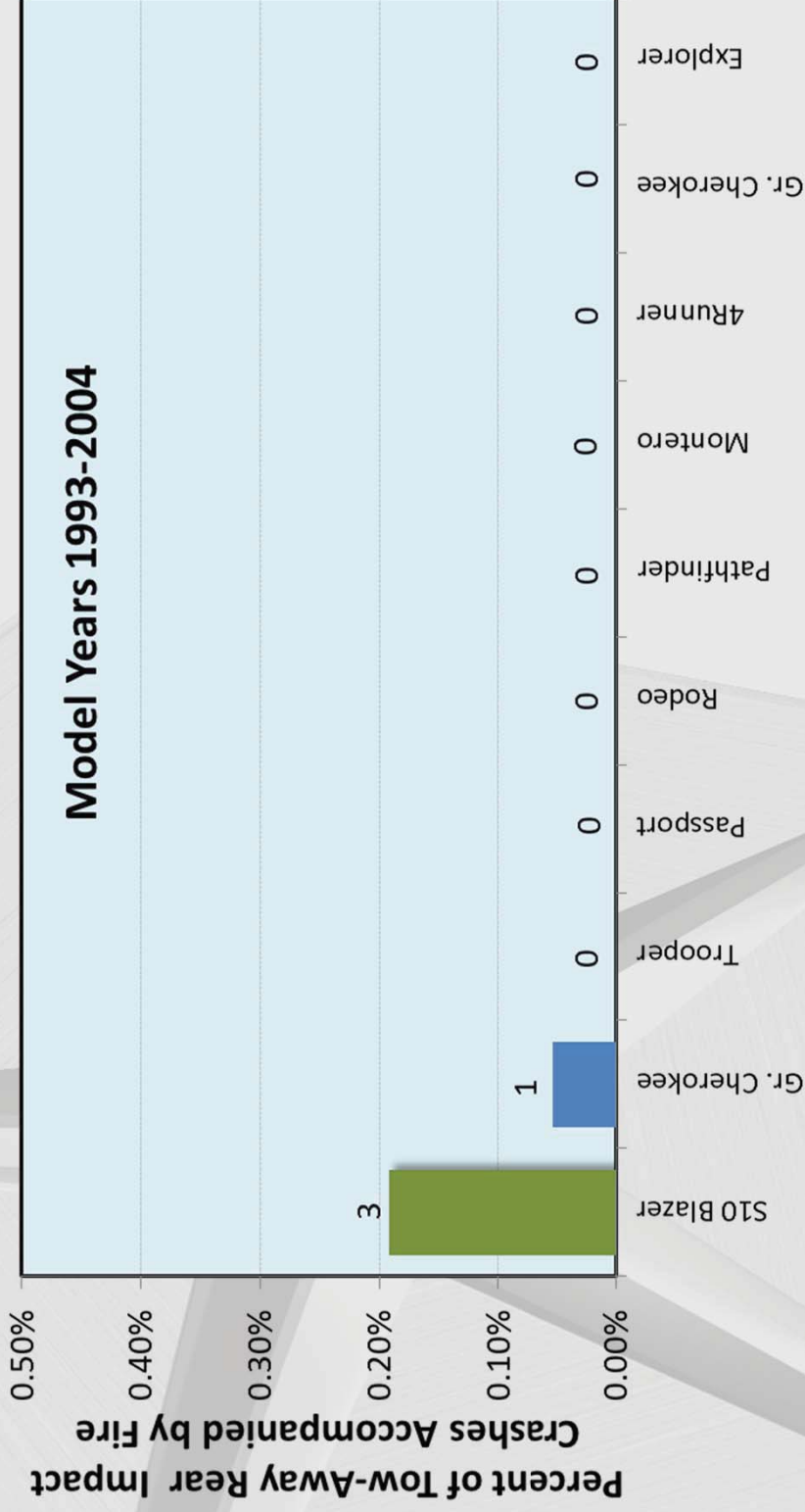


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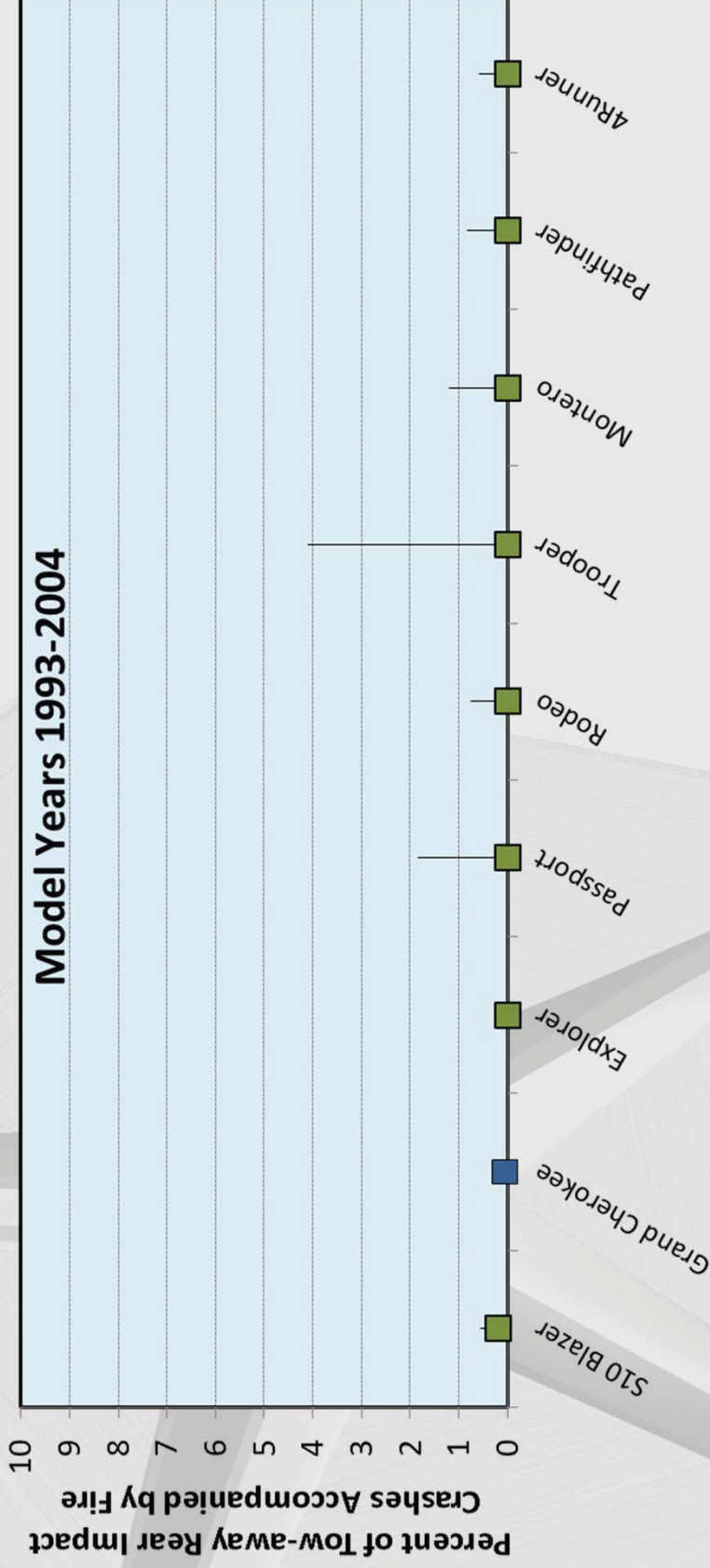


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State Crash Data Analysis Summary:

Key Takeaways:

- **As with the FARS data analysis, the state crash data analyses confirms that:**
 1. Rear impact events that result in fires are extremely rare for both the subject and peer vehicles; and
 2. That the 1993-2004 Jeep Grand Cherokee vehicles are no more likely to experience fire in a rear impact collision than the peer vehicles.

Vehicle Family	Number of Rear Impact Tow-Away Impacts	Number Resulting in Fire	Percentage Resulting in Fire
Chevy Blazer	5216	17	0.33%
Ford Explorer	5927	16	0.27%
Toyota 4Runner	1624	4	0.25%
Jeep Grand Cherokee	4752	9	0.19%

Notes: Includes summed crash data from Illinois, Florida, and North Carolina databases



Summary of Chrysler's PE10-031 Assessment

- In connection with this investigation, Chrysler Group studied publicly available data including NHTSA's EWR and FARS data as well as 3 state databases that enabled the assessment to also include less severe events rather than exclusively those that involved a fatality. It is apparent from this study that:
 1. Rear impacts resulting in a fire are extremely rare;
 2. Rear impacts resulting in a fire occur no more often in the 1993 – 2004 Jeep Grand Cherokee vehicles than in peer vehicles; and
 3. The 1993 – 2004 Jeep Grand Cherokee vehicles are at no greater risk of fire in rear end collisions than peer vehicles.
- 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 impact collisions. Chrysler Group believes the investigation should be closed.



Analysis of Petition #2

Jeep



DODGE



RAM



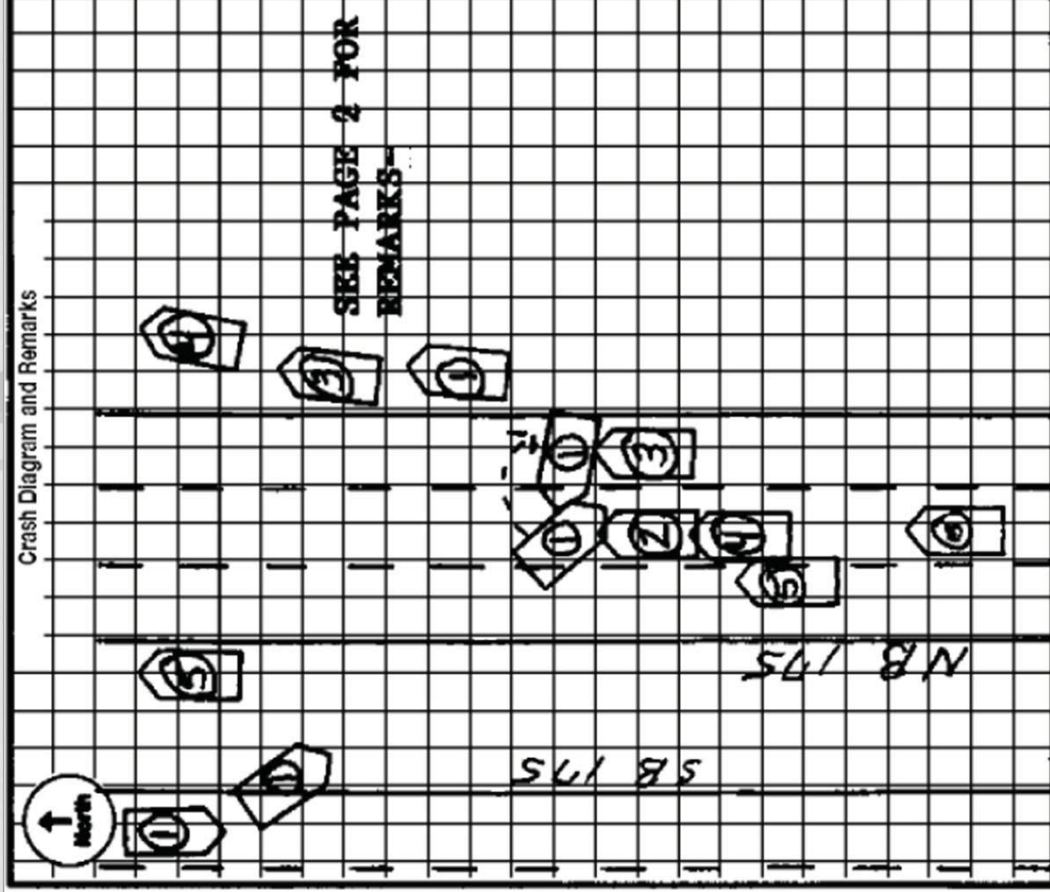
THANK YOU!




Back Up Information



Michigan Crash FARS # 260239



Crash Diagram and Remarks



 VEHICLE 1 TRAVELLING SB 175 IN THE LEFT
 LANE CROSSED THE MEDIAN IN NB TRAFFIC.
 VEHICLE 1 STRIKED VEHICLE 2 HEAD ON,
 VEHICLE 1 WAS AGAIN HIT BY VEHICLE 3,
 VEHICLE 2 WAS AGAIN HIT BY VEHICLE 4.
 VEHICLE 5 ATTEMPTED TO AVOID THE DEBRIS
 AND THE ACCIDENT BUT STILL WAS ENCULPED
 IN FLAMES

