DAIMLERCHRYSLER

02V-215

DaimlerChrysler Corporation
Stephan J. Speth
Director
Vehicle Compliance & Safety Affairs

September 13, 2002

Mr. Jon White
Office of Defects Investigation, Division Chief
National Highway Traffic Safety Administration
400 Seventh Street S.W.
Washington, D.C. 20590

Re: Campaign B23 Chrysler PT Cruiser Fuel Pump Module

Dear Mr. White:

On July 31, 2002 DaimlerChrysler met with NHTSA and reviewed Chrysler PT Cruiser Fuel Pump Module performance during NCAP testing. The Office of Defects Investigation requested the attached documents that were reviewed during the meeting. This submission includes slides 1-8 and 25 of the DaimlerChrysler Presentation (Attachment I) and a material properties specification sheet for the PT Cruiser fuel pump module secondary seal (Attachment II).

In connection with this submission, DaimlerChrysler has submitted certain documents and a videotape to the Office of Chief Counsel requesting that they be permanently protected from public release pursuant to 49 C.F.R. That submission includes a videotape of a Static Rollover evaluation of a Chrysler PT Cruiser equipped with a secondary seal on the fuel pump module and slides 9-24 of the DaimlerChrysler presentation which contain information concerning test procedures, test results, and the associated analyses.

Sincerely,

S. J. Speth

Stephan J. Speth

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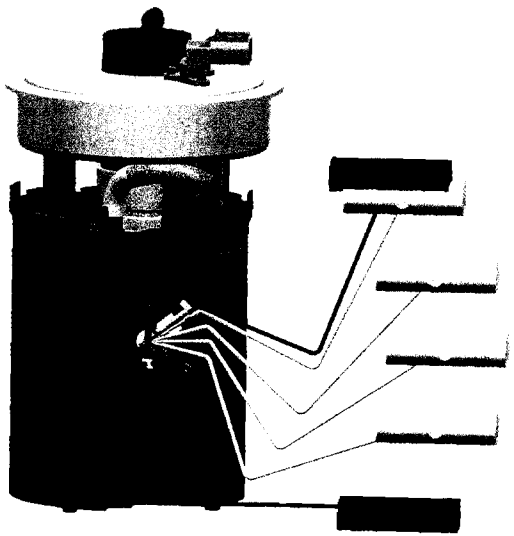
Attachment I

Chrysler PT Cruiser
Fuel Pump Module



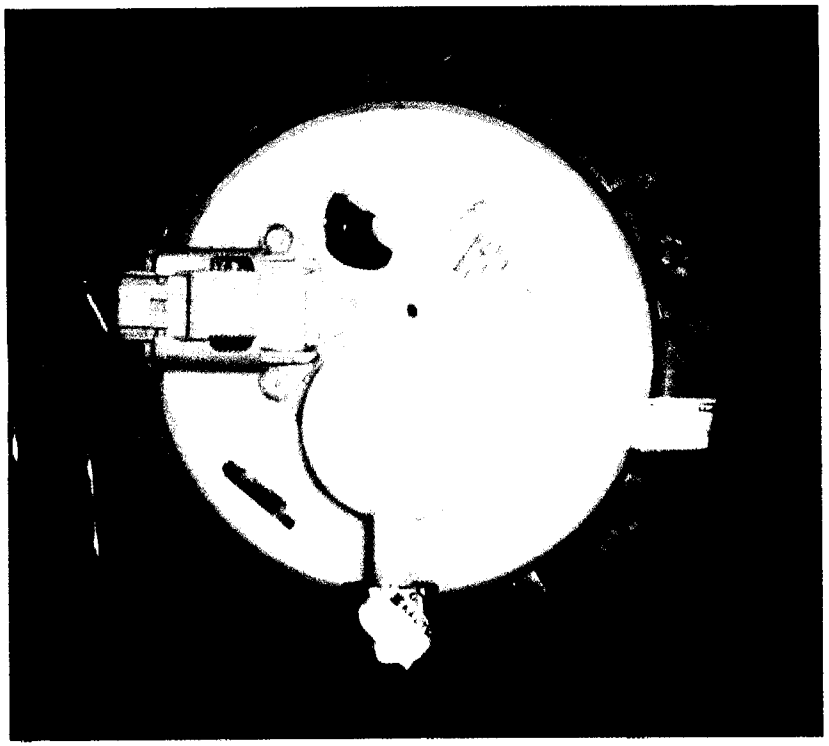
July 31, 2002

Agenda

- NHTSA NCAP Test Review
- DaimlerChrysler (DC) PT Cruiser Impact Experience
- Field Data
- PT Cruiser Fuel Systems Research
- Materials Analysis of NHTSA Test Flange
- Further Actions
- Product Improvement Investigation
  - Secondary Seal Technical Description
  - Secondary Seal Validation
- Summary

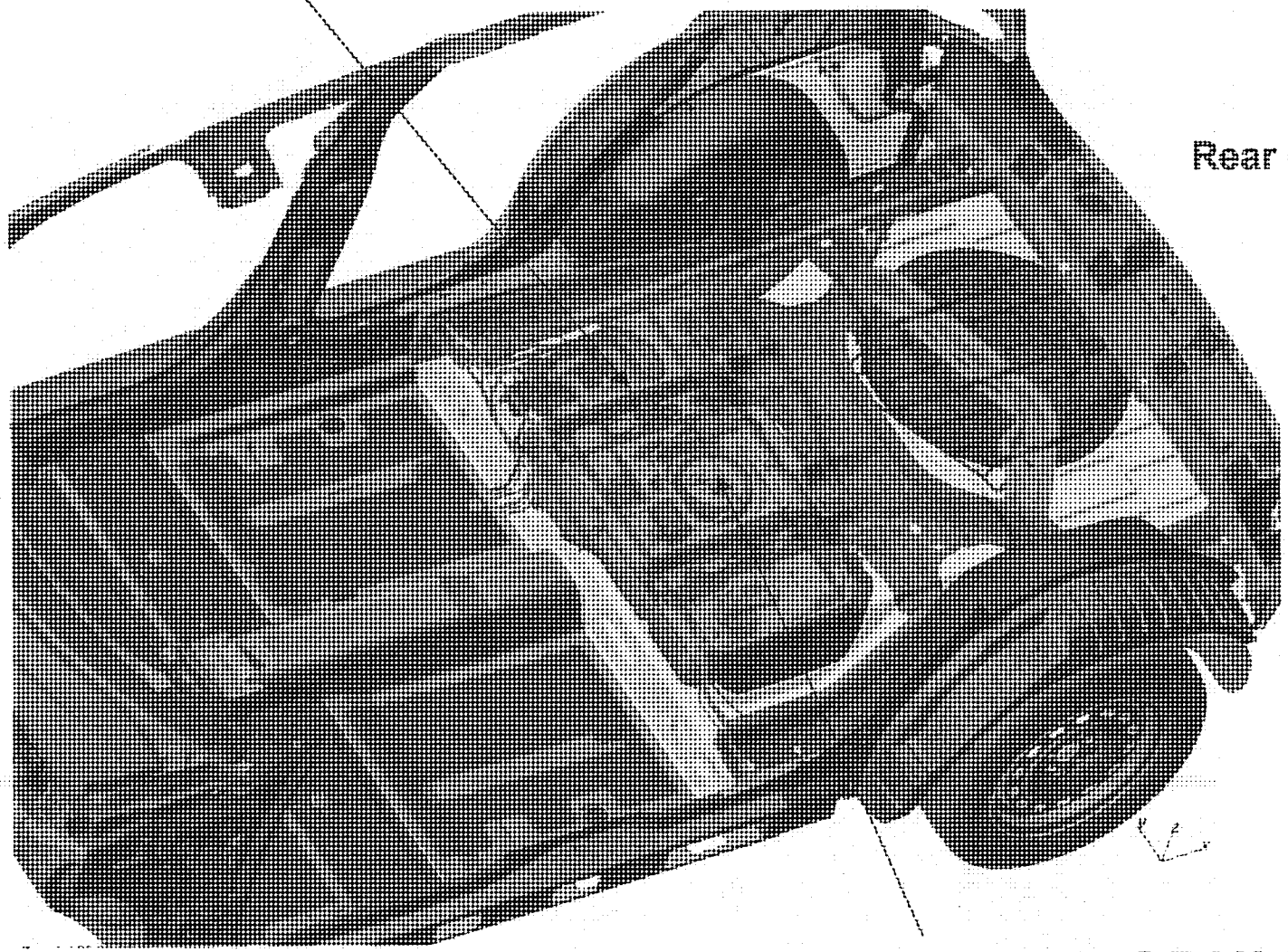
NHTSA NCAP Test

- NCAP test conducted at Veridian on 04/24/02
- Fuel leak detected during the post impact static rollover test
- Post-test vehicle inspection identified a hole on the flange of the fuel pump module
- The test had been run at a non-standard 6 gallon fuel level



PT Cruiser Fuel Pump

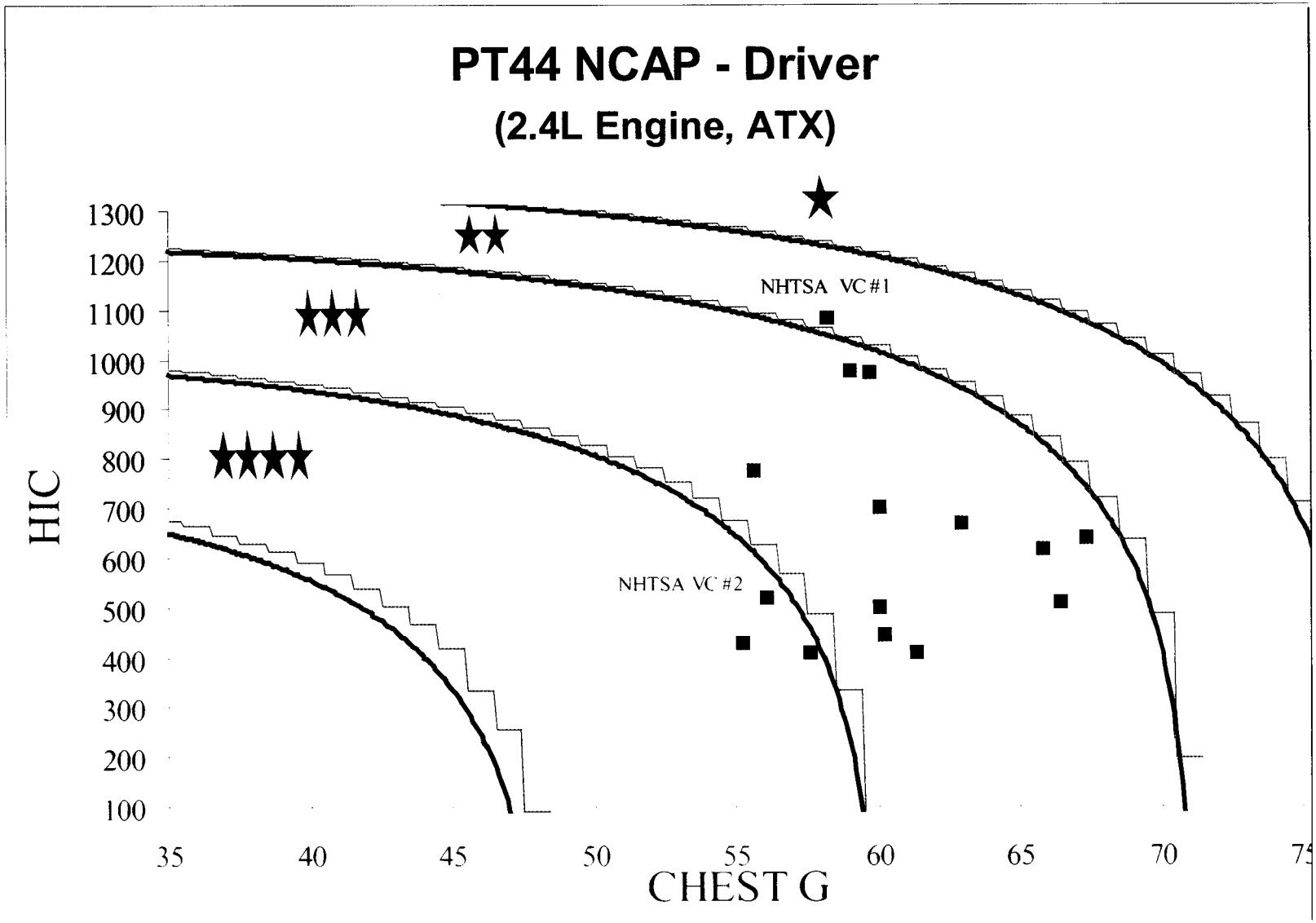
DaimlerChrysler



DC Impact Experience

- 27 NCAP Tests
- 11 IIHS 40mph Offset Frontal Tests
- 3 EuroNCAP tests
- No fuel systems integrity issues observed
- Tests were conducted at low and high fuel levels
  - 7 NCAP, 4 IIHS, and 1 EuroNCAP at 3 gallons
  - 20 NCAP, 7 IIHS, and 2 EuroNCAP at 14.3 gallons (90-95% tank capacity per FMVSS 301 protocol)
- Fifteen vehicles still available were reviewed. While there was evidence of stress on five of the NCAP parts, there was no leakage observed during static rollover.

PT Cruiser NCAP Experience



Field Data

- DC review of data found no occurrences of post-impact fires in the field
- The databases which were reviewed include:
  - DC internal databases
  - CY 2000 FARS and State Accident Databases of Alabama, Florida, Idaho, Illinois, Iowa, Maryland, Missouri
    - Approximately 19,000 PT Cruisers sold in the above states during the 2000 CY
  - CY 2001 Preliminary FARS and State of Florida Accident Database
    - Approximately 10,700 PT Cruisers sold in Florida during the 2001 CY

Field Data

- The following summarizes the results from the FARS and state databases:
  - 436 PT accidents were identified
  - 206 of these collisions were frontal
  - 0 resulted in a post-collision fire
- Based on this field data and previous impact experience, DC does not believe this NCAP test condition represents a real-world safety concern.

Closing Summary

- Secondary seal was implemented into production at launch of the 2003 Model Year PT Cruiser.
- Research of available field data shows that with approximately 460,000 vehicles in the field, no post-collision fires have been identified.
- Review of the 41 DC frontal consumer ratings tests run on PT Cruisers identified no fuel leakage.
- The proposed secondary seal contains any potential fuel leakage within the acceptable limits of MVSS 301 during a post-NCAP roll over evaluation.
- DC proposes to execute a Product Improvement action, as a Safety Recall, to add the secondary seal to the fuel pump module to all 2001-2002 MY PT Cruisers. In consideration of this action, DC requests that there be no reference to the NCAP fuel leak in the test results on the NHTSA website.

Attachment II

ENSOLITE®

Continuous Rolls/Sheets

PHYSICAL PROPERTIES

	Type	**ICF 400**
	Polymer	(NBR/PVC)
	Color	Black
	ASTM D-1056-98 Classification	2CO
1	25% Compression Resistance (psi)	1.0 max.
2	50% Compression Set (%)	5 max.
3	Density (lb/ft³)	3.5 - 5.5
4	Tensile (psi)	20 min.
5	Elongation (%)	100 min.
6	Flammability - MVSS302	Pass
	Standard Roll Widths (in)	48"
	Maximum Gauge (in)	1.00

1	25% COMPRESSION RESISTANCE	ASTM D-1056
2	50% COMPRESSION SET	ASTM D-1056
3	DENSITY	Water displacement method
4	TENSILE	ASTM D-412
5	ELONGATION	ASTM D-412

6 FLAMMABILITY - This item and any corresponding data refer to typical performances in the specific test indicated and should not be construed to imply this material's behavior in other fire conditions. UL 94 - test valid for specific rating and thickness only. See UL 94 listing for details.

NBR = Acrylonitrile Butadiene Rubber
PVC= Polyvinyl Chloride
Available skin two sides 3/8"-1" standard
Other gauges and widths may be available. Please refer to Customer Service.

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