

# DAIMLERCHRYSLER

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August 7, 2002

OFFICE OF DEFECTS  
INVESTIGATION

DaimlerChrysler Corporation

Stephan J. Speth

Director

Vehicle Compliance & Safety Affairs

Mr. Kenneth N. Weinstein  
Associate Administrator, Safety Assurance  
National Highway Traffic Safety Administration  
400 Seventh Street, S.W.  
Washington, D.C. 20590

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Dear Mr. Weinstein:

Attached is a report from DaimlerChrysler Corporation, containing the information specified in 49 CFR Part 573, Defect and Noncompliance Reports, regarding a field action on 2001 and 2002 model year Chrysler PT Cruiser vehicles. Following a recent NHTSA NCAP vehicle test, a hole was found on the top flange of the fuel pump module. Based on field data, and DaimlerChrysler's extensive testing of the PT Cruiser under a variety of fuel loading and impact conditions, DaimlerChrysler does not believe this NCAP test result predicts a real world safety risk or is evidence of a safety related defect.

In fact, given that NHTSA has established fuel tank integrity requirements, which include performance requirements following a 30 mph frontal barrier collision, a performance "failure" in a 35 mph frontal barrier collision does not constitute a "safety-related defect." NHTSA itself has concluded as much in a 1996 decision denying a defect investigation petition filed by Consumers Union:

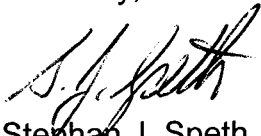
**"When a safety standard establishes minimum performance requirements for motor vehicles or items of motor vehicle equipment through the use of specific values for particular parameters, as is the case here, *NHTSA does not consider performance failures at higher levels to, in themselves, demonstrate that a safety-related defect exists.*"** (emphasis added). Denial of Petition for Defect Investigation, 61 Fed.Reg. 10059 (March 12, 1996).

DaimlerChrysler agrees with NHTSA's 1996 conclusion, and submits that any other conclusion would be inconsistent with the mandate of the National Traffic and Motor Vehicle Safety Act to establish performance standards at the level that "meets the need for motor vehicle safety," which in turn means the safety performance level "that protects the public against unreasonable risk" of accidents, injury, or death. Since the performance anomaly observed in the NCAP test was seen only under crash conditions far more severe

than those found necessary for fuel systems to “meet the need for motor vehicle safety” in FMVSS No. 301, DaimlerChrysler cannot agree that the NCAP test provided evidence of a safety-related defect in the PT Cruiser fuel pump.

Nevertheless, to allay potential consumer concerns about this unique test result, and to avoid unnecessary controversy, DaimlerChrysler has decided to conduct a recall to install a secondary seal on the affected vehicle population as if the issue were a “safety-related defect” under the National Traffic and Motor Vehicle Safety Act. DaimlerChrysler’s decision to do so on these facts does not indicate that DaimlerChrysler would make the same decision in the future on a different set of facts, and does not represent any concession or determination that anomalous performance observed in a consumer ratings test is appropriate evidence of a safety-related defect.

Sincerely,



Stephan J. Speth

Enclosures: Defect Information Report for DaimlerChrysler Corporation Recall # B23  
Dealer Service Instructions for Safety Recall # B23  
Owner Letter for Safety Recall # B23

cc: K. C. DeMeter, NHTSA  
Division of Occupational Safety & Health  
California Department of Industrial Relations

**DEFECT INFORMATION REPORT FOR DAIMLERCHRYSLER RECALL # B23**

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**Submission date:** August 7, 2002

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**Identifying classification of vehicles potentially affected:**

<u>Make</u>	<u>Model</u>	<u>Model Year</u>	<u>Inclusive Dates of Manufacture</u>	<u>US Market Volume</u>
Chrysler	PT Cruiser	2001 - 2002	October 4, 1999 June 2002	345,436

**The involved Vehicle Identification Number range is:**

<u>Low</u>	<u>High</u>
1T200022	1T699798
2T200010	2T389988

(VIN last eight characters) - 1 = 2001 Model Year; 2 = 2002 Model Year; T = Toluca Assembly Plant, Toluca, Mexico; and the last six digits = sequential number.

**We caution that the above range represents only the lowest and highest VIN sequential numbers included in the recall. This range cannot be used to determine conclusively that a vehicle is involved in the recall because many vehicles with a VIN within the range are not affected by the recall.**

**Estimated percentage containing defect:** none

**Description of defect:**

In a NHTSA Consumer Rating NCAP test, the top flange surface of the fuel pump module may crack. A fuel leak may result during the post-test static rollover. This condition is not known to have ever occurred in the field, nor in DaimlerChrysler's previous impact testing of the PT Cruiser. This unique NCAP test condition does not represent a defect, or predict a real world safety risk.

**The name, address and telephone number of the supplier who manufactured the fuel pump module:**

TI Automotive  
50695 Chesterfield Road  
Chesterfield, MI 48051  
(810) 598 - 4572

**The following chronology of principal events occurred between April 24, 2002 and August 1, 2002:**

- On April 24, 2002, NHTSA conducted an NCAP test on a 2002 PT Cruiser. During the

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post-test static rollover, a leak was identified in the fuel system.

- Review of the vehicle by DaimlerChrysler personnel at the test site, Veridian, established that a hole was present on the top flange of the fuel pump module. NHTSA would not release the part to DaimlerChrysler for evaluation and had it sent to the NHTSA offices in Washington.
- Since NHTSA was conducting research on child seats, the Veridian NCAP test was run at a non-standard fuel level (6 gallons) to reduce the vehicle weight to meet the target test weight.
- DaimlerChrysler fuel systems are designed to meet the MVSS 301 Standard. MVSS 301 requires 90-95% fuel capacity and a frontal impact test speed of 30mph. The NCAP test speed is 35mph.
- There were 41 internal NCAP, EuroNCAP, and IIHS tests conducted with no fuel systems integrity issues identified. Fifteen modules from these impact vehicles were reviewed. While there was evidence of stress on five of the NCAP parts, there was no leakage observed during static rollover.
- Review of the DaimlerChrysler's internal databases, the Fatal Analysis Reporting System (FARS), and seven different State Accident Databases identified no occurrences of post-impact fires in the field. Based on this data and the previous impact experience, DaimlerChrysler does not believe the NCAP test condition represents a real-world safety concern.
- The company initiated research to understand the effect of fuel level variation on the PT fuel pump module during NCAP testing. A steel test fixture simulating the PT fuel pump geometry was built with strain gages applied to measure fuel "slosh" loading during the test.
- Testing on the HYGE sled with this test fixture at various fuel levels using a simulated PT NCAP pulse established that the highest strains were detected at 12 gallons of fuel. Comparison to PT vehicle level testing has been inconclusive to date.
- On June 24, 2002, the subject fuel pump module was received from NHTSA for analysis. Review of the part by Materials Engineering did not identify any material or molding abnormalities that caused the condition.
- DaimlerChrysler concluded that the consumers may not understand the NCAP test result. To avoid unnecessary consumer concern, a secondary seal was developed to seal the fuel pump flange surface during NCAP tests.
- The company conducted two NCAP tests on PT Cruisers with secondary seals installed on the fuel pump module. The first test was run with 6 gallons of fuel to replicate the NHTSA test. The second test was run at 12 gallons because the research study indicated that the highest strains on the module may occur at this fuel level. Post-test static rollover evaluations on both test vehicles verified that the vehicle meets MVSS 301.
- As a precaution, the 2003 model year PT Cruiser was launched with this secondary seal installed and is unaffected by this recall.
- This information was presented to the Vehicle Regulations Committee on August 1,

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2002. It was agreed that this NCAP test condition does not predict a real world safety risk, or represent a vehicle defect. However, to allay potential consumer concerns about this unique test result, it was agreed that DaimlerChrysler would conduct a safety recall to install a secondary seal on the affected vehicle population.

**Statement of measures to be taken to correct defect:**

DaimlerChrysler Corporation will conduct a safety recall to install a secondary seal on the affected vehicle population. DaimlerChrysler expects to implement parts distribution on August 8, 2002. Dealer notification was sent August 5, 2002, and Owner Letters will begin mailing on August 12, 2002.

DaimlerChrysler Corporation has a long standing 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, DaimlerChrysler Corporation, as part of the owner letter, will request that customers send original receipt and/or other adequate proof of payment to the company for confirmation of the expense.

August 2002

Dealer Service Instructions for:

# **Safety Recall No. B23**

## **Fuel Pump Module Secondary Seal**

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### **Models**

2001-2002 (PT) Chrysler PT Cruiser

**IMPORTANT:** Some of the involved vehicles may be in dealer new vehicle inventory. **Federal law requires you to stop sale and complete this recall service on these vehicles before retail delivery.** Dealers should also consider this requirement to apply to used vehicle inventory and should perform this recall on vehicles in for service. Involved vehicles can be determined by using the DIAL VIP System.

### **Subject**

The fuel pump module mounting flange on about 345,000 of the above vehicles may leak if the vehicle is involved in a rollover collision. Fuel leakage in the presence of an ignition source can result in a fire.

### **Repair**

A secondary seal must be installed over the fuel pump module on all involved vehicles.

**Parts Information**

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<u>Part Number</u>	<u>Description</u>
<b>CBWAB230</b>	<b>Secondary Seal Package</b>

Each package contains four foam pieces.

Each dealer to whom vehicles in the recall were invoiced will receive enough Secondary Seal Packages to service about 10% of those vehicles.

**Service Procedure**

1. Raise the vehicle on an appropriate hoist.
2. Support the fuel tank with a suitable lifting device.
3. Remove the bolts from the fuel tank straps (Figure 1).

**NOTE:** It is not necessary to drain fuel from the tank or remove the driver's side fuel tank strap from behind the exhaust pipe.

4. Carefully lower the fuel tank about six inches, just enough to access the top of the fuel pump module.

**CAUTION:** Use care to not damage the fuel line and/or wiring.

5. Clean the top of the fuel pump module and lock ring with compressed air. Wipe off the top of the fuel pump module with a clean shop towel.
6. Disconnect the fuel pump module electrical connector.

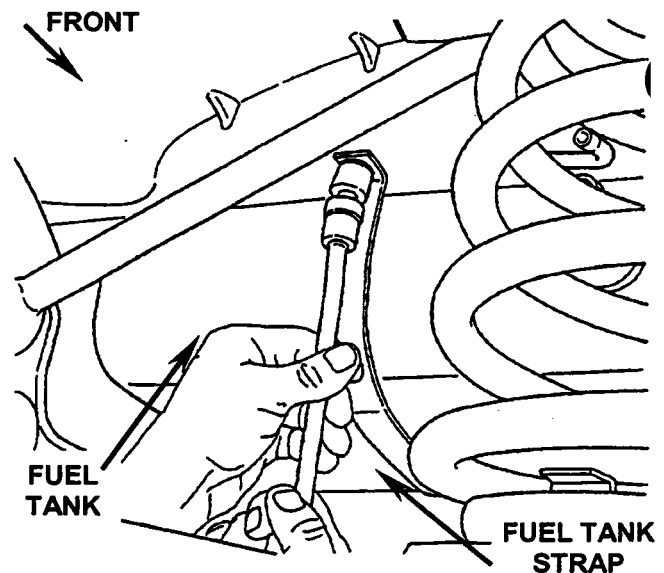


Figure 1

**Service Procedure (Continued)**

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7. Place the thin foam layer directly on top of the fuel pump module flange (Figure 2). Make sure that the appropriate sized cut-out is placed around the pump module electrical connector and fuel tube boss. Ensure that the foam lies flat on the pump module flange.

**NOTE: It is not necessary to disconnect the fuel line.**

8. Connect the fuel pump module electrical connector.

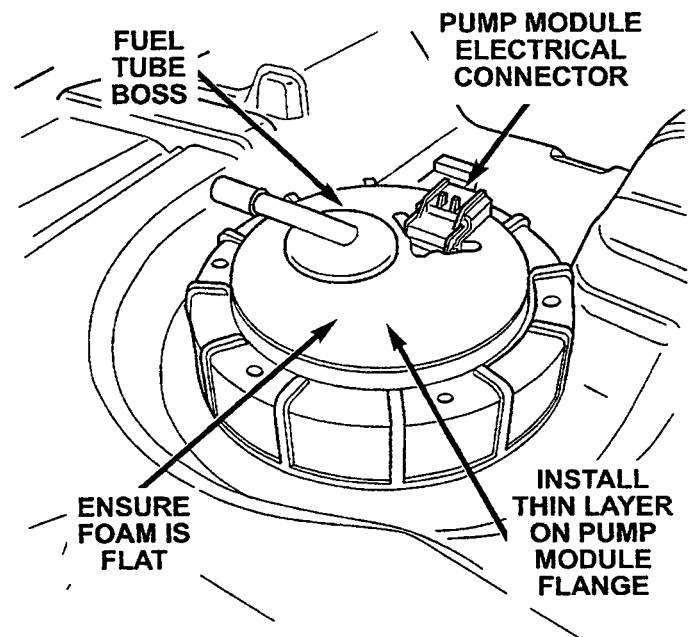


Figure 2

9. Install the thick foam layer with cut-outs on top of the pump module and thin foam layer (Figure 3). Make sure that the cut-out is placed around the pump module electrical connector and that the slit area is above the fuel tube boss.
10. Align the outer edge of the foam with the pump module lock nut and secure it to the fuel pump module with electrical tape as shown in Figure 3.

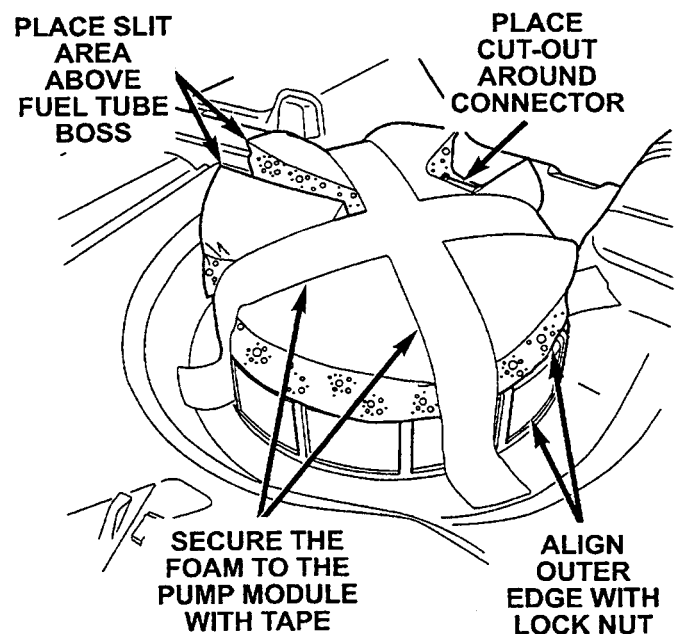


Figure 3



**Service Procedure (Continued)**

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11. Remove the protective paper from the adhesive on one of the solid thick foam layers (no cut-outs or slits). With the adhesive side facing downward, install the foam on top of the pump module and thick foam layer with cut-outs (Figure 4).

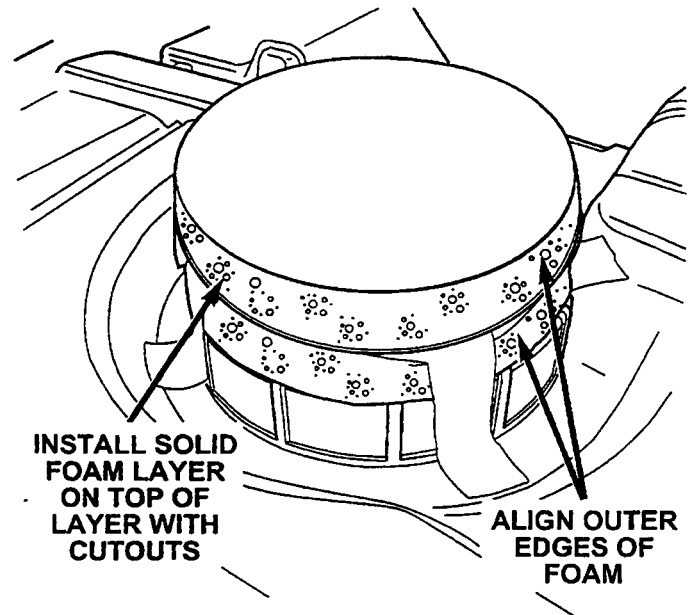


Figure 4

12. Remove the protective paper from the adhesive on the remaining solid thick foam layer. With the adhesive side facing downward, install the foam on top of the pump module and first solid thick foam layer (Figure 5).
13. Carefully raise the fuel tank into position. Make sure that the foam layers remain in place on top of the fuel pump module.

**NOTE** When the tank is raised into position, the foam pieces will be compressed between the floor pan and the top of the fuel pump module.

14. Install the fuel tank strap bolts. Tighten the bolts to 250 in-lbs (23 N·m).
15. Remove the fuel tank support.
16. Lower the vehicle.

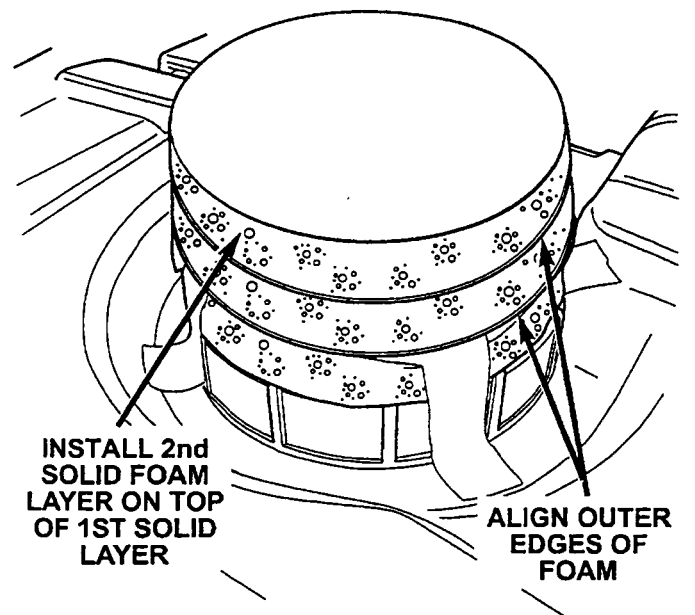


Figure 5

**Completion Reporting and Reimbursement**

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Claims for vehicles that have been serviced must be submitted on the DIAL System. Claims submitted will be used by DaimlerChrysler to record recall service completions and provide dealer payments.

Use the following labor operation number and time allowance:

	<b>Labor Operation Number</b>	<b>Time Allowance</b>
Install secondary seal on fuel pump module	14-B2-31-82	0.3 hours

Add the cost of the recall parts package plus applicable dealer allowance to your claim.

NOTE: See the Warranty Administration Manual, Recall Claim Processing Section, for complete recall claim processing instructions.

**Parts Return**

Not applicable.

**Dealer Notification and Vehicle List**

All dealers will receive a copy of this dealer recall notification letter by first class mail. Two additional copies will be sent through the DCMMS, and the MDS2 will be updated to include this recall in the near future. **Each dealer to whom involved vehicles were invoiced will receive a list of their involved vehicles.** The vehicle list is arranged in Vehicle Identification Number (VIN) sequence. Owners known to DaimlerChrysler are also listed. The lists are for dealer reference in arranging for service of involved vehicles.

**DIAL System Functions 53 and VIP**

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All involved vehicles have been entered to DIAL System Functions 53 and VIP for dealer inquiry as needed.

Function 53 provides involved dealers with an updated VIN list of their incomplete vehicles. The customer name, address and phone number are listed if known. Completed vehicles are removed from Function 53 within several days of repair claim submission. To use this system, type "53" at the "ENTER FUNCTION" prompt, then type "ORDB23".

**Owner Notification and Service Scheduling**

All involved vehicle owners known to DaimlerChrysler are being notified of the service requirement by first class mail. They are requested to schedule appointments for this service with their dealers. A copy of the owner letter is attached.

Enclosed with each owner letter is an Owner Notification Form. The involved vehicle and recall are identified on the form for owner or dealer reference as needed.

**Vehicle Not Available**

If a vehicle is not available for service, let us know by filling out the pre-addressed Owner Notification Form or describe the reason on a postcard and mail to:

DaimlerChrysler Corporation  
CIMS 482-00-85  
800 Chrysler Drive East  
Auburn Hills, Michigan 48326-2757

**Additional Information**

If you have any questions or need assistance in completing this action, please contact your Zone Service Office.

Customer Services Field Operations  
DaimlerChrysler Corporation

## SAFETY RECALL TO INSTALL A SECONDARY SEAL OVER YOUR VEHICLE'S FUEL PUMP MODULE

Dear PT Cruiser Owner:

This notice is sent to you in accordance with the requirements of the National Traffic and Motor Vehicle Safety Act.

DaimlerChrysler Corporation has determined that a defect, which relates to motor vehicle safety, exists in some **2001 and 2002 model year Chrysler PT Cruiser vehicles.**

*The problem is...*

**DaimlerChrysler has determined that the fuel pump module mounting flange on your PT Cruiser (identified on the enclosed form) may leak fuel if your vehicle is involved in a rollover collision. Fuel leakage in the presence of an ignition source can result in a fire.**

*What DaimlerChrysler and your dealer will do...*

**DaimlerChrysler will make improvements to your vehicle free of charge (parts and labor).** To do this, your dealer will install a secondary seal over the fuel pump module. The work will take about ½ hour to complete. However, additional time may be necessary depending on how dealer appointments are scheduled and processed.

*What you must do to ensure your safety...*

- **Simply contact your dealer** right away to schedule a service appointment. Ask the dealer to hold the parts for your vehicle or to order them before your appointment.
- **Bring the enclosed form with you to your dealer.** It identifies the required service to the dealer.

*If you need help...*

If you have questions or concerns which the dealer is unable to resolve, please contact the DaimlerChrysler Customer Assistance Center at 1-800-853-1403. A representative will assist you.

If your dealer fails or is unable to remedy this defect without charge and within a reasonable time, you may submit a written complaint to the Administrator, National Highway Traffic Safety Administration, 400 Seventh Street, S.W., Washington, DC 20590, or call the toll-free Auto Safety Hotline at 1-888-327-4236.

We're sorry for any inconvenience, but we are sincerely concerned about your safety. Thank you for your attention to this important matter.

Customer Services Field Operations  
DaimlerChrysler Corporation  
B23

*Buckle up  
for Safety*