

Thomas McCarthy
Head, Vehicle Safety Compliance and Product
Analysis

April 5, 2019

Ms. Heidi King, Deputy Administrator
National Highway Traffic Safety Administration
1200 New Jersey Ave. SE
Washington, DC 20590

**Re: Recall 19V-199 (2017-2018 MY Dodge Journey Reflex Reflector Noncompliance per FMVSS 108) and
Recall 19E-025 (Replacement Dodge Journey Headlamp Assembly Reflex Reflector Noncompliance per
FMVSS 108) Petition for Determination of Inconsequential Noncompliance**

Dear Ms. King:

FCA US LLC (f/k/a Chrysler Group LLC) ("FCA US") is a Delaware limited liability company with its principal place of business at 1000 Chrysler Drive, Auburn Hills, MI 48326.

Pursuant to 49 CFR Part 556, FCA US is petitioning for an exemption from the notification and remedy requirements of the National Traffic and Motor Vehicle Safety Act because the noncompliance described below is inconsequential to motor vehicle safety.

This petition relates to FCA US' safety non-compliance vehicle recall V22 (NHTSA recall 19V-199) and equipment recall V24 (NHTSA recall 19E-025), which involves an incorrect reflex reflector which does not fully meet the photometric requirements of S8.1.11 of FMVSS 108. The safety noncompliance defect information report was filed after it was discovered that approximately 84,908 Dodge Journey vehicles and approximately 16,604 replacement Dodge Journey headlamp assemblies built between August 2, 2017, and July 6, 2018, were assembled with headlamp assemblies with the noncompliant reflex reflector. Three copies of the 49 CFR Part 573 Defect Information Report for V22 (NHTSA recall 19V-199) filing are attached as Enclosure A and three copies of the 49 CFR Part 573 Defect Information Report for V24 (NHTSA recall 19E-025) filing are attached as Enclosure B.

Description of the Noncompliance

FCA US has determined that some 2017-2018 MY Dodge Journey vehicles with headlamp assemblies do not fully comply with the photometry requirements specified in FMVSS 108.

Dodge Journey vehicles are manufactured with an amber side reflex reflector integrated into the headlamp assembly. On the affected vehicles and affected headlamp assemblies, the reflex reflector does not meet the minimum photometry requirements at the observation angle of 0.2 degrees. (The reflex reflector does meet all of the minimum photometry requirements at the observation angle of 1.5 degrees.) See Appendix A of Enclosure C (FCA's Subjective Evaluation Report).

Potential Impact on Safety and Justification for Petition for a Determination of Inconsequentiality

NHTSA recently described the safety function of reflex reflectors as follows:

“For the purposes of FMVSS No. 108, the primary function of a reflex reflector is to prevent crashes **by permitting early detection of an unlighted motor vehicle at an intersection or when parked on or by the side of the road**. Because reflex reflectors are not independent light sources, their performance is wholly reliant upon the amount of illumination they receive from vehicle headlamps. Ideally, a reflex reflector would achieve its highest performance when the reflex reflector is mounted at the height of another vehicle's lower beam ‘hot spot.’ Due to the significant range of permissible mounting heights for headlamps (between 22 and 54 inches), achieving such ideal performance is impractical. FMVSS No. 108, which establishes minimum performance standards for reflex reflectors, specifies a range of acceptable reflector mounting heights (not less than 15 inches or more than 60 inches) to ensure that reflex reflectors are exposed to enough illumination to be effective. The standard also provides allowances in the fore and aft location of reflex reflectors (*e.g.*, as far to the front as practicable). This flexibility provides vehicle manufacturers with sufficient flexibility in mounting locations to ensure that the mounting height remains in the appropriate range to ensure adequate reflex reflector performance relative to headlamps that would illuminate them.” Decision on Petition for Inconsequential Noncompliance, 82 Fed. Reg. 24204, May 25, 2017. (emphasis added).

For reasons discussed below, and supported by a demonstration project conducted by FCA US, FCA US submits that the reflex reflectors on the subject vehicles perform adequately to meet the safety purpose of the standard because they permit the early detection of an unlighted motor vehicle at an intersection or when parked, notwithstanding their deviation from certain photometric requirements.

FCA US believes that the failure of these reflex reflectors to meet the photometric requirements does not reduce their effectiveness in providing the necessary visibility for oncoming vehicles, and that the difference between the reflectivity provided by a compliant reflector is not distinguishable from the reflectivity provided by a noncompliant reflector.

To demonstrate this point, FCA US conducted an informal evaluation comparing the performance of a Dodge Journey equipped with a known compliant reflex reflector with a Dodge Journey equipped with a known noncompliant reflex reflector. This evaluation was conducted with two Dodge Journey vehicles parked front end to front end across the road surface 100 feet (30.5 meters) away from vehicles that used their headlamps as a source of illumination for observers to evaluate the luminous intensity of each front side reflex reflector. The 100 feet (30.5 meter) distance was chosen because that is the distance specified in FMVSS 108 and CMVSS 108 for testing reflex reflectors using a goniometer in a photometric laboratory.

A 2019 Jeep Cherokee with LED projector headlamps and a 2019 Ram 1500 Pickup Truck with LED reflector headlamps were used as sources of illumination. Sixteen volunteer evaluators (who were FCA US or FCA Canada Inc. employees) stood immediately in front of, and at the centerline of, the vehicles whose headlamps were being used as the source of illumination. Evaluators were asked if they were able to distinguish a difference between the compliant and noncompliant reflex reflectors.

None of the evaluators were able to distinguish any luminous intensity differences of the light being reflected in any of the scenarios.

The details of the test setup and evaluated scenarios are described in more detail in the attached evaluation report (Enclosure C), which also contains photographs documenting the visibility of both vehicles. These photos were taken through a camera lens set at centerline of road, centerline of the Jeep Cherokee or Ram 1500, and height above ground equivalent to that of an average height female driver sitting in the driver's seat of the Jeep Cherokee or Ram 1500, based on vehicle being used.

The reflex reflectors in the subject vehicles are mounted 32.31 to 32.62 inches from the ground to the center of the devices. The headlamp mounting heights of the two vehicles used as sources of illumination in the evaluation are 34.89 inches for the Jeep Cherokee and 39.59 inches for the Ram 1500. FCA US believes that these vehicles cover the range of typical headlamp mounting heights for vehicles on the road today. Nevertheless, FCA US is undertaking another round of evaluations using a vehicle with a lower headlamp mounting height as a source of illumination to try to demonstrate a "worst case" scenario. FCA US expects to supplement this petition with the results of that further evaluation in the near future.

In consideration of the foregoing demonstration that the subject noncompliant condition is inconsequential as it relates to motor vehicle safety, FCA US petitions to be exempt from the notification and remedy provisions of the Motor Vehicle Safety Act as provided in 49 CFR Part 556.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Thomas McCarthy', is written over the typed name.

Thomas McCarthy

Enclosures

CC: Mr. Kareem Habib

Acting Chief, Recall Management Division

Zip/Postal Code: 48098

Chronology of Defect / Noncompliance Determination

Provide the chronology of events leading up to the defect decision or test data for the noncompliance decision.:

• On December 18, 2018, the FCA US LLC ("FCA US") Vehicle Safety and Regulatory Compliance ("VSRC") organization opened an investigation as a result of an audit of a front amber side reflex reflector performed by Transport Canada. • From December 2018 through February 2019, meetings were conducted between FCA US VSRC, FCA US Engineering and the supplier to review the issue, confirm the test results and root cause, understand the suspect part delivery dates to identify the suspect period and scope of vehicles affected, and understand the supplier corrective actions implemented. • As of March 14, 2019, FCA US identified zero CAIRs, zero VOQs, and zero field reports related to this issue. • As of March 14, 2019, total warranty is 0.0 c/1000. • As of March 14, 2019, FCA US is not aware of any accidents or injuries potentially related to this issue. • On March 7, 2019, FCA US determined, through the Vehicle Regulations Committee, to conduct a voluntary safety recall of the affected vehicles.

Identify the Remedy

Describe the defect/noncompliance remedy program, including the manufacturer's plan for reimbursement.

FCA US will conduct a Voluntary Safety Recall on all affected vehicles. The remedy for this item is currently under development. FCA US 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, FCA US, 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.

Describe what distinguishes the remedy component from the recalled component.

Part Name: HEADLAMP ASSY - FRT RT / HEADLAMP ASSY - FRT LT / HEADLAMP ASSY - FRT RT / HEADLAMP ASSY - FRT LT Part Description: Front Right Headlamp Assembly / Front Left Headlamp Assembly / Front Right Headlamp Assembly / Front Left Headlamp Assembly Part Number: 05116288AC / 05116289AC / 68200084AB / 68200085AB

Identify and describe how and when the recall condition was corrected in production.

Identify the Recall Schedule

Describe the recall schedule for notifications.:

** 3/14/2019: FCA US plans to submit a request for inconsequentiality on or before April 5, 2019.

Planned Dealer Notification Begin Date:

Planned Dealer Notification End Date:

Planned Owner Notification Begin Date:

Planned Owner Notification End Date:

Manufacturer's identification code for this recall (if applicable):

V22

Please be reminded that owner notification letters must be mailed no more than 60 days from submission of this report.

Manufacturer Comments to NHTSA Staff

Document Upload

There are 1 documents associated with this report.



Chrysler (FCA US LLC)

Equipment Report

NHTSA ID: 19E025 Transaction ID: 19-00273-22016-10 (Original Report)

Required fields indicated with *

Manufacturer: Chrysler (FCA US LLC)

800 Chrysler Drive
Auburn Hills MI 48326-2757

[Jennifer Shute](#) Sr Mgr Safety Recall Execution
2484942681,

This is a Noncompliance Report. Filing a petition pursuant to [49 CFR 556](#)

Equipment Information

Mopar Headlamp Assembly 05116288AC

* **Brand/Trade:** Mopar

* **Model:** Headlamp Assembly

Production Dates Begin: 08/02/2017
 End: 07/06/2018

* **Part No.:** 05116288AC

Size:

Function:

Headlamp Asmbly

Descriptive Information:

Some headlamp assemblies manufactured and sold as aftermarket equipment may be equipped with a front amber side reflex reflector that may not meet the photometric requirements of Federal Motor Vehicle Safety Standard ("FMVSS") 108. Supplier production records were used to identify the start and end dates of headlamp assemblies with a photometric noncompliant front amber side reflex reflector. The scope was determined by the number of parts shipped from the supplier to Mopar parts depots during the suspect period. Similar headlamp assemblies not included in the recall were manufactured before or after the suspect period with amber side reflex reflectors that meet the photometric requirements of FMVSS 108. The affected volume of part no. 05116288AC is 5,367.

Mopar Headlamp Assembly 05116289AC

* **Brand/Trade:** Mopar

* **Model:** Headlamp Assembly

Production Dates Begin: 08/02/2017
 End: 07/06/2018

* **Part No.:** 05116289AC

Size:

Function:

Headlamp Asmbly

Descriptive Information:

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Mopar Headlamp Assembly 68200084AB

* **Brand/Trade:** Mopar

* **Model:** Headlamp Assembly

Production Dates Begin: 08/02/2017
 End: 07/06/2018

* **Part No.:** 68200084AB

Size:

Function:

Headlamp Asmbly

Descriptive Information:

Some headlamp assemblies manufactured and sold as aftermarket equipment may be equipped with a front amber side reflex reflector that may not meet the photometric requirements of Federal Motor Vehicle Safety Standard ("FMVSS") 108. Supplier production records were used to identify the start and end dates of headlamp assemblies with a photometric noncompliant front amber side reflex reflector. The scope was determined by the number of parts shipped from the supplier to Mopar parts depots during the suspect period. Similar headlamp assemblies not included in the recall were manufactured before or after the suspect period with amber side reflex reflectors that meet the photometric requirements of FMVSS 108. The affected volume of part no. 68200084AB is 3,002.

Mopar Headlamp Assembly 68200085AB

* **Brand/Trade:** Mopar

* **Model:** Headlamp Assembly

Function:

Headlamp Asmbly

Descriptive Information:

Production Dates Begin: 08/02/2017
End: 07/06/2018

*** Part No.:** 68200085AB
Size:

Some headlamp assemblies manufactured and sold as aftermarket equipment may be equipped with a front amber side reflex reflector that may not meet the photometric requirements of Federal Motor Vehicle Safety Standard ("FMVSS") 108. Supplier production records were used to identify the start and end dates of headlamp assemblies with a photometric noncompliant front amber side reflex reflector. The scope was determined by the number of parts shipped from the supplier to Mopar parts depots during the suspect period. Similar headlamp assemblies not included in the recall were manufactured before or after the suspect period with amber side reflex reflectors that meet the photometric requirements of FMVSS 108. The affected volume of part no. 68200085AB is 2,557.

Number potentially involved: 16604 **Estimated percentage of involved with defect:** 100%

Defect / Noncompliance Description

For this Defect/Noncompliance:

*** Describe the defect or noncompliance:**

FMVSS 108 S8.1.11 requires amber side reflect reflectors to "conform to the photometry requirements of Table XVI-a when tested according to the procedure of S14.2.3 for the reflex reflector color as specified by this section." The amber side reflex reflector assembled into the suspect headlamp assemblies do not meet the applicable photometric requirements.

If a noncompliance, provide the applicable FMVSS:

108 - Lamps, reflective devices, and assoc. Equipment

If applicable, provide any further FMVSS affected:

Describe the cause:

*** Describe the safety risk:**

If the reflection of light from the reflector is below specification, the position and dimensions of the vehicle may not always be perceived by other drivers. FCA US believes that the noncompliance with FMVSS 108, in this instance, is inconsequential as it relates to motor vehicle safety, and will be submitting a petition under 49 CFR Part 556.

Identify any warning which can precede or occur:

This Recall affects all vehicles.

If applicable, identify the manufacturer of the defective or noncompliant component. If the manufacturer of the component is unknown, provide the information for the company that supplied the subject component.

Component manufacturer

Company Information

Company Name: HBPO North America Inc.

Country: United States

Address 1: 700 Tower Drive

Address 2:

City: Troy

State: MICHIGAN

Zip/Postal Code: 48098

Company Contact Information

First Name: Calvin

Last Name: Jennings

Position: Director, Sales & Marketing NAFTA

Email: calvin.jennings@hbpogroup.com

Phone: 2488237076

Purchaser Information

Chronology of Defect / Noncompliance Determination

Provide the chronology of events leading up to the defect decision or test data for the noncompliance decision.:

• On December 18, 2018, the FCA US LLC ("FCA US") Vehicle Safety and Regulatory Compliance ("VSR") organization opened an investigation as a result of an audit of a front amber side reflex reflector performed by Transport Canada. • From December 2018 through February 2019, meetings were conducted between FCA US VSR, FCA US Engineering and the supplier to review the issue, confirm the test results and root cause, understand the suspect part delivery dates to identify the suspect period and scope of parts affected, and understand the supplier corrective actions implemented. • As of March 14, 2019, FCA US identified zero CAIRs, zero VOQs, and zero field reports related to this issue. • As of March 14, 2019, total warranty is 0.0 c/1000. • As of March 14, 2019, FCA US is not aware of any accidents or injuries potentially related to this issue. • On March 7, 2019, FCA US determined, through the Vehicle Regulations Committee, to conduct a voluntary safety recall of the affected parts.

Identify the Remedy

Describe the defect/noncompliance remedy program, including the manufacturer's plan for reimbursement.

FCA US will conduct a Voluntary Safety Recall on all affected parts. The remedy for this item is currently under development. FCA US 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, FCA US, 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.

Describe what distinguishes the remedy component from the recalled component.

Part Name: HEADLAMP ASSY - FRT RT / HEADLAMP ASSY - FRT LT / HEADLAMP ASSY - FRT RT / HEADLAMP ASSY - FRT LT Part Description: Front Right Headlamp Assembly / Front Left Headlamp Assembly / Front Right Headlamp Assembly / Front Left Headlamp Assembly Part Number: 05116288AC / 05116289AC / 68200084AB / 68200085AB

Identify and describe how and when the recall condition was corrected in production.

Identify the Recall Schedule

Describe the recall schedule for notifications.:

** 3/14/2019: FCA US plans to submit a request for inconsequentiality on or before April 5, 2019.

Planned Dealer Notification Begin Date:

Planned Dealer Notification End Date:

Planned Owner Notification Begin Date:

Planned Owner Notification End Date:

Manufacturer's identification code for this recall (if applicable):

V24

Please be reminded that owner notification letters must be mailed no more than 60 days from submission of this report.

Manufacturer Comments to NHTSA Staff

Document Upload

There are 1 documents associated with this report.

1200 New Jersey Avenue, SE, West Building Washington DC 20590 USA 1.888.327.4236 TTY 1.800.424.9153
This application works best in IE9 and above and recent versions of Firefox, Chrome and Safari

Subject: FCA US LLC Subjective Evaluation of Dodge Journey Front Side Reflex Reflectors.

Location: FCA Canada Inc. Automotive Research and Development Center Lighting Tunnel, Windsor, Ontario, Canada.

Date: March 22, 2019.

Background:

Reflex reflectors are devices used on vehicles to give an indication to approaching drivers using reflected light from the lamps of the approaching vehicle. A subjective evaluation of the “on-vehicle” reflective performance of Dodge Journey Front Side Reflex Reflectors was conducted to determine if human eyes are capable of distinguishing between reflex reflectors known to not meet, and known to meet, the photometric requirements of FMVSS 108 and CMVSS 108.

Evaluation:

A subjective evaluation was conducted of a Dodge Journey with a headlamp assembly containing a front side reflex reflector known not to meet FMVSS 108 / CMVSS 108 photometric requirements compared to a Dodge Journey with a headlamp assembly containing a front side reflex reflector known to meet FMVSS 108 / CMVSS 108 photometric requirements. This evaluation was conducted at 6:30 am, Friday, March 22, 2019 in the Lighting Tunnel at the FCA Canada Inc. Automotive Research and Development Center in Windsor, Ontario, Canada. Sixteen FCA US LLC and FCA Canada Inc. employees, with various job responsibilities, participated in this subjective evaluation.

This evaluation was conducted with two Dodge Journey vehicles parked front end to front end across the road surface 100 feet (30.5 meters) away from vehicles that used their headlamps as a source of illumination for observers to evaluate the luminous intensity of each front side reflex reflector. The 100 feet (30.5 meter) distance was chosen because that is the distance that is specified in FMVSS 108 and CMVSS 108 for testing reflex reflectors using a goniometer in a photometric laboratory.

A black Dodge Journey was parked across the left side of the pavement with a passenger side headlamp containing a front side reflex reflector known to not meet FMVSS 108 and CMVSS 108 photometric requirements (see Appendix A). A red Dodge Journey was parked across the right side of the pavement with a driver side headlamp containing a front side reflex reflector known to meet FMVSS 108 and CMVSS 108 photometric requirements (see Appendix B). For reference, FMVSS 108 and CMVSS 108 photometric requirements are shown in Appendix C.

A 2019 Jeep Cherokee with LED projector headlamps and a 2019 Ram 1500 Pickup Truck with LED reflector headlamps were used as sources of illumination. Evaluators stood immediately in front of, and at the centerline of, the vehicles whose headlamps were being used as the source of illumination. Evaluators were asked if they were able to distinguish a difference between the reflex reflectors.

Five different scenarios were subjectively evaluated as described below:

Subjective Evaluation A: Jeep Cherokee Low beam Headlamps used as light source at center of the pavement shining towards the two Dodge Journey vehicles. See Figures 1 and 2.

Subjective Evaluation B: Jeep Cherokee High Beam Headlamps used as light source at center of the pavement shining towards the two Dodge Journey vehicles. See Figures 3 and 4.

Subjective Evaluation C: Jeep Cherokee Low beam Headlamps used as light source at the left edge of pavement (146 inches to the left of the centerline of pavement) shining towards the two Dodge Journey vehicles. See Figures 5 and 6.

Subjective Evaluation D: Jeep Cherokee Low beam Headlamps used as light source at the right edge of pavement (150 inches to the right of the centerline of pavement) shining towards the two Dodge Journey vehicles. See Figures 7 and 8.

Subjective Evaluation E: Ram 1500 Pickup Truck Low beam Headlamps used as light source at the center of the pavement shining towards the two Dodge Journey vehicles. See Figures 9 and 10.

Findings:

None of the sixteen evaluators were able to distinguish any luminous intensity differences of the light being reflected to their eyes from the Dodge Journey front side reflex reflectors that were being illuminated by the headlamps of the source vehicles in the 5 subjective evaluations that were conducted.

This report was compiled by:

Dennis Novack
Senior Technical Specialist
FCA US LLC Exterior Lighting Engineering

Subjective Evaluation A: Jeep Cherokee Low beam Headlamps used as light source at center of the pavement shining towards the two Dodge Journey vehicles. See Figures 1 and 2.

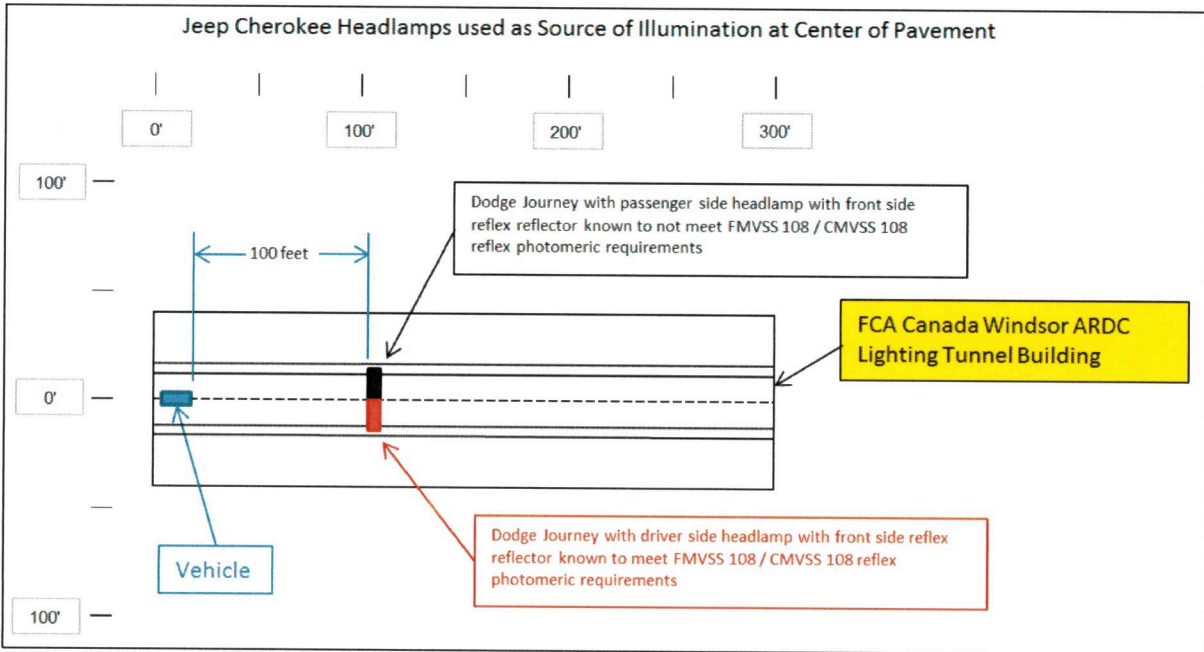


Figure 1 - Diagram of Subjective Evaluation of Dodge Journey Front Side Reflex Reflectors viewed from center of pavement with Low Beam Headlamps used as source of illumination.



Figure 2 - Photograph of Subjective Evaluation using Jeep Cherokee Low Beam Headlamps as light source. Camera lens set at centerline of road, centerline of the Jeep Cherokee, and height above ground equivalent to that of an average height female driver sitting in the driver's seat of the Jeep Cherokee.

Subjective Evaluation B: Jeep Cherokee High Beam Headlamps used as light source at center of the pavement shining towards the two Dodge Journey vehicles. See Figures 3 and 4.

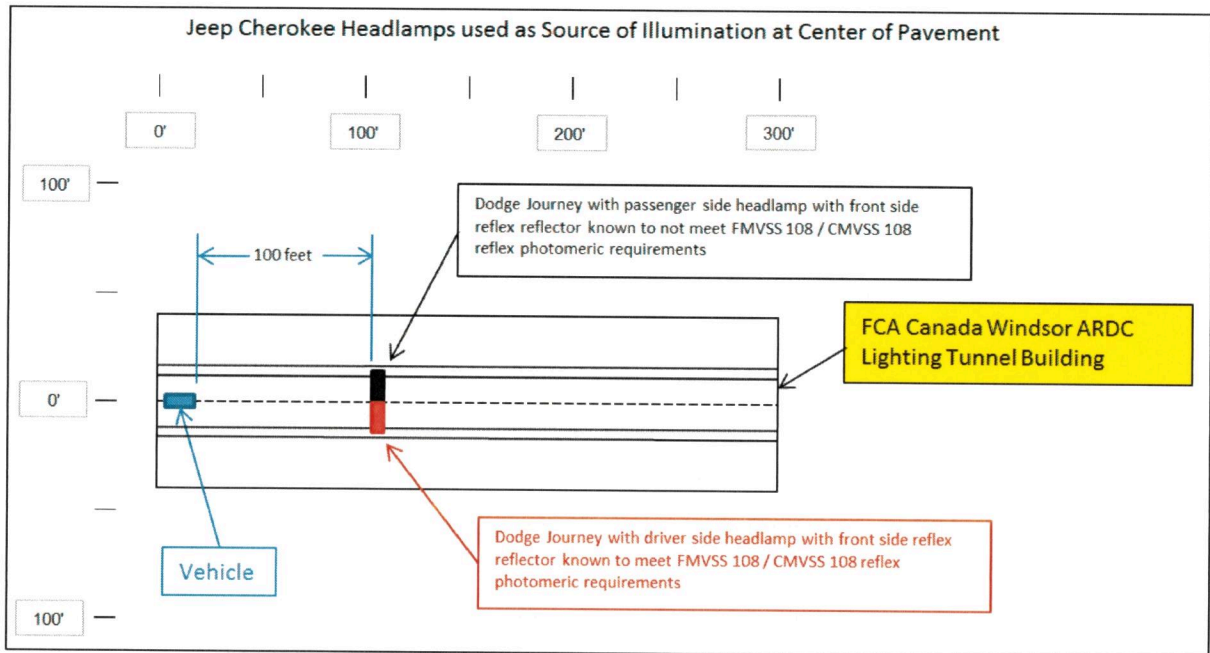


Figure 3 - Diagram of Subjective Evaluation of Dodge Journey Front Side Reflex Reflectors viewed from center of pavement with High Beam Headlamps used as source of illumination.



Figure 4 - Photograph of Subjective Evaluation using Jeep Cherokee High Beam Headlamps as light source. Camera lens set at centerline of road, centerline of the Jeep Cherokee, and height above ground equivalent to that of an average height female driver sitting in the driver's seat of the Jeep Cherokee.

Subjective Evaluation C: Jeep Cherokee Low beam Headlamps used as light source at the left edge of pavement (146 inches to the left of the centerline of pavement) shining towards the two Dodge Journey vehicles. See Figures 5 and 6.

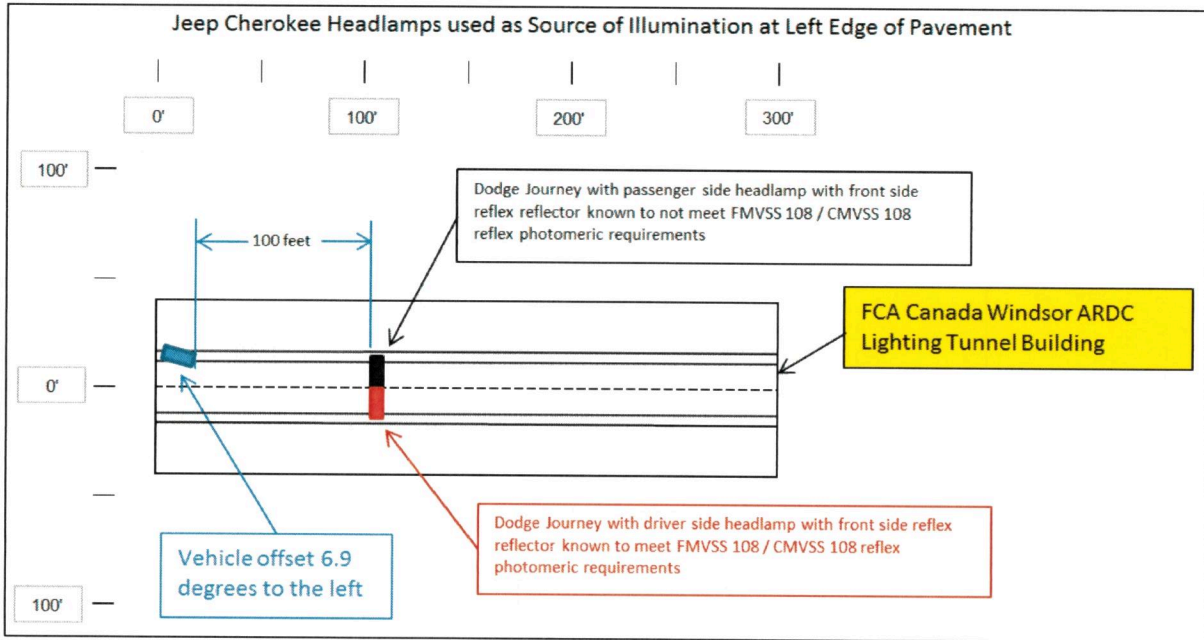


Figure 5 - Diagram of Subjective Evaluation of Dodge Journey Front Side Reflex Reflectors viewed from left edge of pavement with Jeep Cherokee Low Beam Headlamps used as source of illumination.

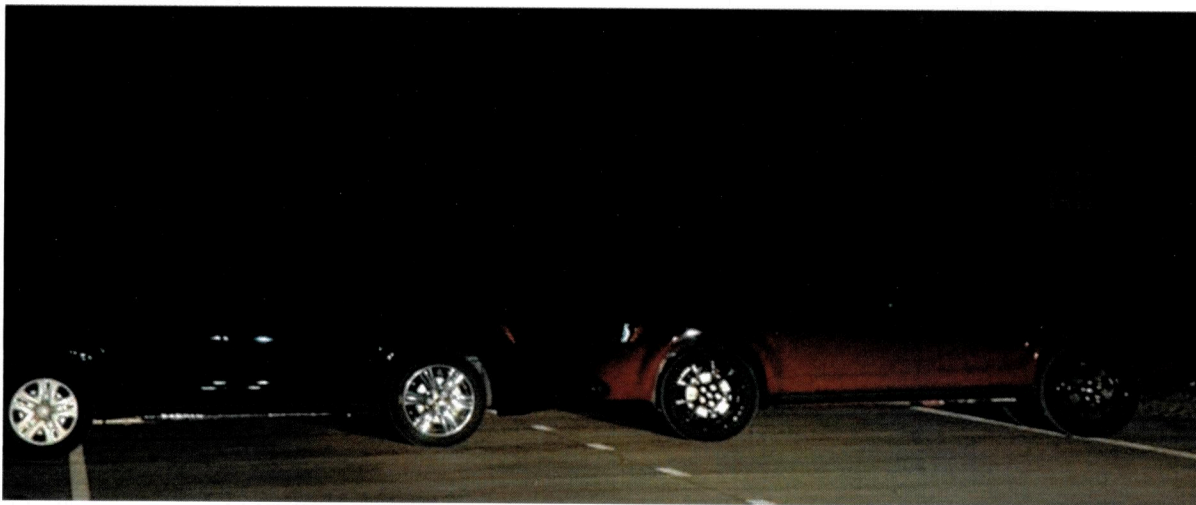


Figure 6 - Photograph of Subjective Evaluation using Jeep Cherokee Low Beam Headlamps as source of illumination. Camera lens set at left edge of pavement, centerline of the Jeep Cherokee, and height above ground equivalent to that of an average height female driver.

Subjective Evaluation D: Jeep Cherokee Low beam Headlamps used as light source at the right edge of pavement (150 inches to the right of the centerline of pavement) shining towards the two Dodge Journey vehicles. See Figures 7 and 8.

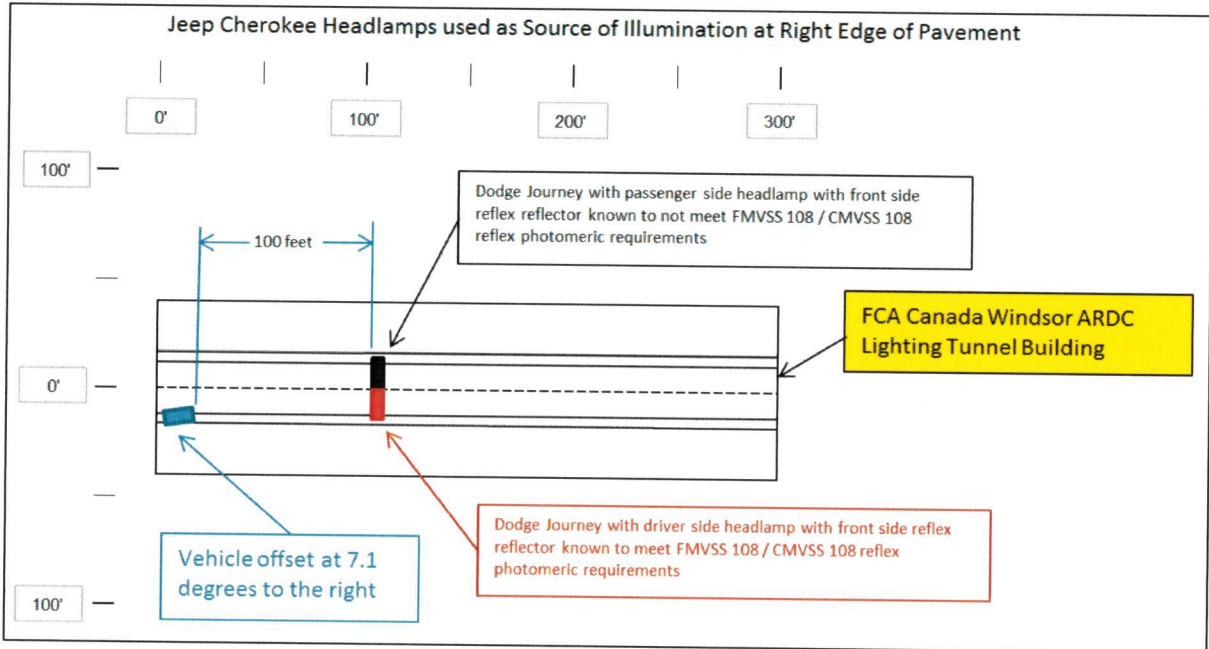


Figure 7 - Diagram of Subjective Evaluation of Dodge Journey Front Side Reflex Reflectors viewed from right edge of pavement Illumination with Low Beam Headlamps used as source of illumination.



Figure 8 - Photograph of Subjective Evaluation using Jeep Cherokee Low Beam Headlamps as source of illumination. Camera lens set at right edge of pavement, centerline of the Jeep Cherokee, and height above ground equivalent to that of an average height female driver.

Subjective Evaluation E: Ram 1500 Pickup Truck Low beam Headlamps used as light source at the center of the pavement shining towards the two Dodge Journey vehicles. See Figures 9 and 10.

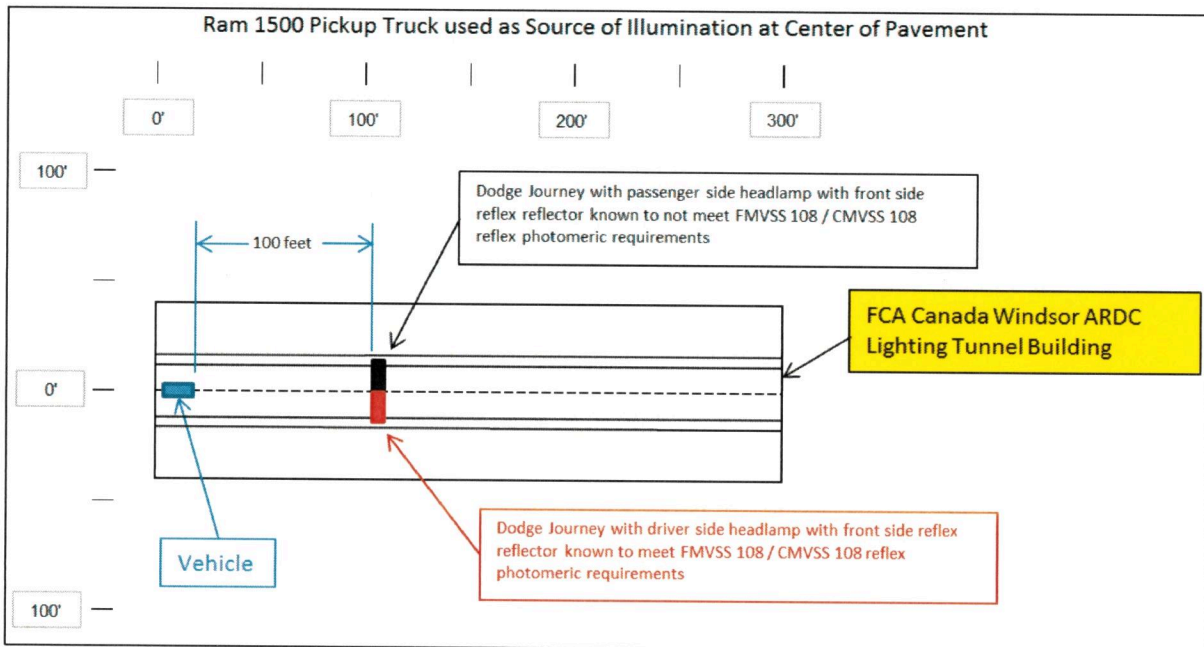


Figure 9- Diagram of Subjective Evaluation of Dodge Journey Front Side Reflex Reflectors viewed from center of pavement Illumination with Ram 1500 Pickup Truck Low Beam Headlamps used as source of illumination.



Figure 10- Photograph of Subjective Evaluation using Ram 1500 Pickup Truck Low Beam Headlamps as source of illumination. Camera lens set at right edge of pavement, centerline of Ram 1500 Pickup Truck, and height above ground equivalent to that of an average height female driver sitting in the driver's seat of the Ram 1500 Pickup Truck.

Appendix A: Photometric report for the right hand (passenger side) Front Side Reflex Reflector contained in the Headlamp Assembly installed in the black Dodge Journey used for the March 22, 2019 Subjective Evaluation at the FCA Automotive Research and Development Center Windsor Lighting Tunnel. Photometric report is from laboratory test conducted by Sapphire Technical Solutions.

Report No.: TR1143		March 09,2018						
STS Charlotte - 1553-01 RH Dodge Journey HL # SR895 - Photometric Test Report: Reflex Amber MVSS108 # TR3345								
Test Function	Date/Time	Operator			Equipment			
Reflex Amber MVSS108	2/27/2018 12:10:18 PM	REW			STS AP-OEM			
Work Order	Serial Number		Lamp					
1553-01	1553-01 (2017-0005)		RH dodge Journey Headlamp - Reflex					
Sales Order	Requisitioner			Color				
1603	Transport Canada			Amber				
Notes:								
Aiming Offset:	L/R = 0.00	U/D = 0.00						
Fixture Offset:	L/R = 89.17	U/D = -0.00		Height = 11.06	X = 8.20	Y = -0.22		
Multiplier:	1.0000							
Supply	Source Name	Set Voltage	Set Current	Meas. Voltage	Meas. Current			
4	PROJECTOR	18.00	8.168 (*)	15.343	8.167			
Pass/Fail Results:	Testpoints:	Req. = FAIL InHouse = PASS						
Description / Location	L/R Angle	U/D Angle	Cd/ft	Pass/Fail	Min	Max	InH Min	InH Max
H-V	0.00	0.00	2.216	F---	11.25	--	--	--
H-V 1.5Deg.	0.00	0.00	0.833	----	.175	--	--	--
10U-V	0.00	10.00	1.911	F---	7.5	--	--	--
10U-V 1.5Deg.	0.00	10.00	0.647	----	.125	--	--	--
10D-V	0.00	-10.00	1.816	F---	7.5	--	--	--
10D-V 1.5Deg.	0.00	-10.00	0.721	----	.125	--	--	--
H-20R	20.00	0.00	1.029	F---	3.75	--	--	--
H-20R 1.5Deg.	20.00	0.00	0.391	----	.075	--	--	--
H-20L	-20.00	0.00	1.177	F---	3.75	--	--	--
H-20L 1.5Deg.	-20.00	0.00	0.378	----	.075	--	--	--
2/27/2018 12:10:18 PM ----- Equipment: AP Series by Sapphire Technical Solutions L.L.C.								

Appendix B: Photometric report for the left hand (driver side) Front Side Reflex Reflector contained in the Headlamp Assembly installed in the red Dodge Journey used for the March 22, 2019 Subjective Evaluation at the Lighting Tunnel at the FCA Automotive Research and Development Center in Windsor, Canada. Photometric report is from laboratory test conducted by SL China (Yantai).

SL CHINA (YANTAI)
PHOTOMETRIC RESULTS



Program:	Jul 95	R/R NAS PHOTO AMBER
R/R NAS PHOTO_AMBER		
Name:	JC49 NAS RR ASSY LH 181106	
Number:		
Report:		
Test no.:		

R/R NAS PHOTO_AMBER

Function	Min	Max	H [jā]	V [jā]	R [mcd/lx]	Unit	N.O.K.
0.2jÆ at H - V	1050	-	0	0	1997.0	mcd/lx	OK
0.2jÆ at H - 10U	700	-	0	10	2010.0	mcd/lx	OK
0.2jÆ at H - 10D	700	-	0	-10	1691.0	mcd/lx	OK
0.2jÆ at 20L - V	350	-	-20	0	1187.0	mcd/lx	OK
0.2jÆ at 20R - V	350	-	20	0	1376.0	mcd/lx	OK
1.5jÆ at H - V	15	-	0	0	44.1	mcd/lx	OK
1.5jÆ at H - 10U	12.5	-	0	10	35.9	mcd/lx	OK
1.5jÆ at H - 10D	12.5	-	0	-10	32.5	mcd/lx	OK
1.5jÆ at 20L - V	7.5	-	-20	0	22.4	mcd/lx	OK
1.5jÆ at 20R - V	7.5	-	20	0	26.8	mcd/lx	OK

Appendix C: Reflex Reflector Photometry Requirements in FMVSS 108 and Canada Technical Standards Document (TSD) 108:

USA/FEDERAL: 49 CFR 571.108 (FMVSS 108) **Installation of lighting equipment; Operating instructions** **Page: 109**

Table XVI-a: Reflex Reflector Photometry Requirements

Observation angle (degrees)	Entrance angle (degrees)	Minimum performance					
		Red reflectors		Amber reflectors		White reflectors	
		(cd/incident ft-c)	(mcd/lux)	(cd/incident ft-c)	(mcd/lux)	(cd/incident ft-c)	(mcd/lux)
0.2	0	4.5	420	11.25	1050	18	1680
	10U	3.0	280	7.5	700	12	1120
	10D ⁽¹⁾	3.0	280	7.5	700	12	1120
	20L	1.5	140	3.75	350	6	560
	20R	1.5	140	3.75	350	6	560
	1.5	0	0.07	6	0.175	15	0.28
1.5	10U	0.05	5	0.125	12.5	0.2	20
	10D ⁽¹⁾	0.05	5	0.125	12.5	0.2	20
	20L	0.03	3	0.075	7.5	0.12	12
	20R	0.03	3	0.075	7.5	0.12	12

⁽¹⁾ Where reflex reflectors are mounted with their axis of reference less than 750 mm above the road surface, photometry requirements below 5° down may be met at 5° down rather than at the required specified downward angle.

Lamps, Reflective Devices, and Associated Equipment **TSD No. 108, Revision 6**

Table XVI-a—Reflex Reflector Photometry Requirements

Observation angle (degrees)	Entrance angle (degrees)	Minimum performance					
		Red reflectors		Amber reflectors		White reflectors	
		(cd/incident ft-c)	(mcd/lux)	(cd/incident ft-c)	(mcd/lux)	(cd/incident ft-c)	(mcd/lux)
0.2	0	4.5	420	11.25	1050	18	1680
	10U	3.0	280	7.5	700	12	1120
	10D ⁽¹⁾	3.0	280	7.5	700	12	1120
	20L	1.5	140	3.75	350	6	560
	20R	1.5	140	3.75	350	6	560
	1.5	0	0.07	6	0.175	15	0.28
1.5	10U	0.05	5	0.125	12.5	0.2	20
	10D ⁽¹⁾	0.05	5	0.125	12.5	0.2	20
	20L	0.03	3	0.075	7.5	0.12	12
	20R	0.03	3	0.075	7.5	0.12	12

⁽¹⁾ Where reflex reflectors are mounted with their axis of reference less than 750 mm above the road surface, photometry requirements below 5° down may be met at 5° down rather than at the required specified downward angle.

Part 573 Safety Recall Report

19E-025

Manufacturer Name : Chrysler (FCA US LLC)

Submission Date : MAR 14, 2019

NHTSA Recall No. : 19E-025

Manufacturer Recall No. : V24



Manufacturer Information :

Manufacturer Name : Chrysler (FCA US LLC)

Address : 800 Chrysler Drive
CIMS 482-00-91 Auburn Hills MI
48326-2757

Company phone : 1-800-853-1403

Population :

Number of potentially involved : 16,604

Estimated percentage with defect : 100 %

Equipment Information :

Brand / Trade 1 : Mopar

Model : Headlamp Assembly

Part No. : 05116289AC

Size : NR

Function : Headlamp Asmblly

Descriptive Information : Some headlamp assemblies manufactured and sold as aftermarket equipment may be equipped with a front amber side reflex reflector that may not meet the photometric requirements of Federal Motor Vehicle Safety Standard ("FMVSS") 108.

Supplier production records were used to identify the start and end dates of headlamp assemblies with a photometric noncompliant front amber side reflex reflector. The scope was determined by the number of parts shipped from the supplier to Mopar parts depots during the suspect period.

Similar headlamp assemblies not included in the recall were manufactured before or after the suspect period with amber side reflex reflectors that meet the photometric requirements of FMVSS 108.

The affected volume of part no. 05116289AC is 5,678.

Production Dates : AUG 02, 2017 - JUL 06, 2018

Brand / Trade 2 : Mopar

Model : Headlamp Assembly

Part No. : 05116288AC

Size : NR

Function : Headlamp Asmblly

Descriptive Information : Some headlamp assemblies manufactured and sold as aftermarket equipment may be equipped with a front amber side reflex reflector that may not meet the photometric requirements of Federal Motor Vehicle Safety Standard ("FMVSS") 108.

Supplier production records were used to identify the start and end dates of headlamp assemblies with a photometric noncompliant front amber side reflex reflector. The scope was determined by the number of parts shipped from the supplier to Mopar parts depots during the suspect period.

Similar headlamp assemblies not included in the recall were manufactured before or after the suspect period with amber side reflex reflectors that meet the photometric requirements of FMVSS 108.

The affected volume of part no. 05116288AC is 5,367.

Production Dates : AUG 02, 2017 - JUL 06, 2018

Brand / Trade 3 : Mopar

Model : Headlamp Assembly

Part No. : 68200084AB

Size : NR

Function : Headlamp Asmbly

Descriptive Information : Some headlamp assemblies manufactured and sold as aftermarket equipment may be equipped with a front amber side reflex reflector that may not meet the photometric requirements of Federal Motor Vehicle Safety Standard ("FMVSS") 108.

Supplier production records were used to identify the start and end dates of headlamp assemblies with a photometric noncompliant front amber side reflex reflector. The scope was determined by the number of parts shipped from the supplier to Mopar parts depots during the suspect period.

Similar headlamp assemblies not included in the recall were manufactured before or after the suspect period with amber side reflex reflectors that meet the photometric requirements of FMVSS 108.

The affected volume of part no. 68200084AB is 3,002.

Production Dates : AUG 02, 2017 - JUL 06, 2018

Brand / Trade 4 : Mopar

Model : Headlamp Assembly

Part No. : 68200085AB

Size : NR

Function : Headlamp Asmbly

Descriptive Information : Some headlamp assemblies manufactured and sold as aftermarket equipment may be equipped with a front amber side reflex reflector that may not meet the photometric requirements of Federal Motor Vehicle Safety Standard ("FMVSS") 108.

Supplier production records were used to identify the start and end dates of headlamp assemblies with a photometric noncompliant front amber side reflex reflector. The scope was determined by the number of parts shipped from the supplier to Mopar parts depots during the suspect period.

Similar headlamp assemblies not included in the recall were manufactured before or after the suspect period with amber side reflex reflectors that meet the photometric requirements of FMVSS 108.

The affected volume of part no. 68200085AB is 2,557.

Production Dates : AUG 02, 2017 - JUL 06, 2018

Description of Noncompliance :

Description of the Noncompliance : FMVSS 108 S8.1.11 requires amber side reflect reflectors to "conform to the photometry requirements of Table XVI-a when tested according to the procedure of S14.2.3 for the reflex reflector color as specified by this section." The amber side reflex reflector assembled into the suspect headlamp assemblies do not meet the applicable photometric requirements.

FMVSS 1 : 108 - Lamps, reflective devices, and assoc. Equipment

FMVSS 2 : NR

Description of the Safety Risk : If the reflection of light from the reflector is below specification, the position and dimensions of the vehicle may not always be perceived by other drivers. FCA US believes that the noncompliance with FMVSS 108, in this instance, is inconsequential as it relates to motor vehicle safety, and will be submitting a petition under 49 CFR Part 556.

Description of the Cause : NR

Identification of Any Warning that can Occur : NR

Supplier Identification :

Component Manufacturer

Name : HBPO North America Inc.

Address : 700 Tower Drive

Troy MICHIGAN 48098
Country : United States

Chronology :

- On December 18, 2018, the FCA US LLC ("FCA US") Vehicle Safety and Regulatory Compliance ("VSRC") organization opened an investigation as a result of an audit of a front amber side reflex reflector performed by Transport Canada.
- From December 2018 through February 2019, meetings were conducted between FCA US VSRC, FCA US Engineering and the supplier to review the issue, confirm the test results and root cause, understand the suspect part delivery dates to identify the suspect period and scope of parts affected, and understand the supplier corrective actions implemented.
- As of March 14, 2019, FCA US identified zero CAIRs, zero VOQs, and zero field reports related to this issue.
- As of March 14, 2019, total warranty is 0.0 c/1000.
- As of March 14, 2019, FCA US is not aware of any accidents or injuries potentially related to this issue.
- On March 7, 2019, FCA US determined, through the Vehicle Regulations Committee, to conduct a voluntary safety recall of the affected parts.

Description of Remedy :

Description of Remedy Program : FCA US will conduct a Voluntary Safety Recall on all affected parts. The remedy for this item is currently under development.

FCA US 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, FCA US, 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.

How Remedy Component Differs from Recalled Component : Part Name: HEADLAMP ASSY - FRT RT / HEADLAMP ASSY - FRT LT / HEADLAMP ASSY - FRT RT / HEADLAMP ASSY - FRT LT

Part Description: Front Right Headlamp Assembly / Front Left Headlamp Assembly / Front Right Headlamp Assembly / Front Left Headlamp Assembly

Part Number: 05116288AC / 05116289AC / 68200084AB / 68200085AB

Identify How/When Recall Condition was Corrected in Production : NR

Recall Schedule :

Description of Recall Schedule : ** 3/14/2019: FCA US plans to submit a request for inconsequentiality on or before April 5, 2019.

Planned Dealer Notification Date : NR - NR

Planned Owner Notification Date : NR - NR

Purchaser Information :

The following manufacturers purchased this defective/noncompliant equipment for possible use or installation in new motor vehicles or new items of motor vehicle equipment:

Name : NR

Address : NR

NR

Country : NR

Company Phone : NR

* NR - Not Reported

Part 573 Safety Recall Report

19V-199

Manufacturer Name : Chrysler (FCA US LLC)**Submission Date :** MAR 14, 2019**NHTSA Recall No. :** 19V-199**Manufacturer Recall No. :** V22**Manufacturer Information :**

Manufacturer Name : Chrysler (FCA US LLC)

Address : 800 Chrysler Drive
CIMS 482-00-91 Auburn Hills MI
48326-2757

Company phone : 1-800-853-1403

Population :

Number of potentially involved : 84,908

Estimated percentage with defect : 100 %

Vehicle Information :

Vehicle 1 : 2017-2018 Dodge Journey

Vehicle Type :

Body Style : SUV

Power Train : NR

Descriptive Information : Some 2017-2018 MY Dodge Journey vehicles may be equipped with a front amber side reflex reflector that may not meet the photometric requirements of Federal Motor Vehicle Safety Standard ("FMVSS") 108.

The suspect period began at Toluca Assembly Plant on August 2, 2017, when parts with a photometric noncompliant front amber side reflex reflector were introduced into vehicle production, to July 6, 2018, when suspect parts were no longer used in production. Supplier production records were used to identify the suspect period.

Similar vehicles not included in the recall were built before or after the suspect period with amber side reflex reflectors that meet the photometric requirements of FMVSS 108.

Production Dates : AUG 02, 2017 - JUL 06, 2018

VIN Range 1 : Begin :

NR

End : NR

 Not sequential**Description of Noncompliance :**

Description of the Noncompliance : FMVSS 108 S8.1.11 requires vehicles to "conform to the photometry requirements of Table XVI-a when tested according to the procedure of S14.2.3 for the reflex reflector color as specified by this section." Vehicles built with the affected amber side reflex reflector do not meet the applicable photometric requirements.

FMVSS 1 : 108 - Lamps, reflective devices, and assoc. Equipment

FMVSS 2 : NR

Description of the Safety Risk : If the reflection of light from the reflector is below specification, the position and dimensions of the vehicle may not always be perceived by other drivers. FCA US believes that the noncompliance with FMVSS 108, in this instance, is inconsequential as it relates to motor vehicle safety, and will be submitting a petition under 49 CFR Part 556.

Description of the Cause : NR

Identification of Any Warning that can Occur : NR

Supplier Identification :

Component Manufacturer

Name : HBPO North America Inc.

Address : 700 Tower Drive
Troy MICHIGAN 48098

Country : United States

Chronology :

- On December 18, 2018, the FCA US LLC ("FCA US") Vehicle Safety and Regulatory Compliance ("VSRC") organization opened an investigation as a result of an audit of a front amber side reflex reflector performed by Transport Canada.
- From December 2018 through February 2019, meetings were conducted between FCA US VSRC, FCA US Engineering and the supplier to review the issue, confirm the test results and root cause, understand the suspect part delivery dates to identify the suspect period and scope of vehicles affected, and understand the supplier corrective actions implemented.
- As of March 14, 2019, FCA US identified zero CAIRs, zero VOQs, and zero field reports related to this issue.
- As of March 14, 2019, total warranty is 0.0 c/1000.
- As of March 14, 2019, FCA US is not aware of any accidents or injuries potentially related to this issue.
- On March 7, 2019, FCA US determined, through the Vehicle Regulations Committee, to conduct a voluntary safety recall of the affected vehicles.

Description of Remedy :

Description of Remedy Program : FCA US will conduct a Voluntary Safety Recall on all affected vehicles. The remedy for this item is currently under development.

FCA US 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, FCA US, 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.

How Remedy Component Differs from Recalled Component : Part Name: HEADLAMP ASSY - FRT RT / HEADLAMP ASSY - FRT LT / HEADLAMP ASSY - FRT RT / HEADLAMP ASSY - FRT LT

Part Description: Front Right Headlamp Assembly / Front Left Headlamp Assembly / Front Right Headlamp Assembly / Front Left Headlamp Assembly

Part Number: 05116288AC / 05116289AC / 68200084AB / 68200085AB

Identify How/When Recall Condition was Corrected in Production : NR

Recall Schedule :

Description of Recall Schedule : ** 3/14/2019: FCA US plans to submit a request for inconsequentiality on or before April 5, 2019.

Planned Dealer Notification Date : NR - NR

Planned Owner Notification Date : NR - NR

* NR - Not Reported