



Thomas McCarthy
Head, Vehicle Safety Compliance and Product
Analysis

June 28, 2019

Ms. Heidi King, Deputy Administrator
National Highway Traffic Safety Administration
1200 New Jersey Ave. SE
Floor 4 Room W40 308
Washington, DC 20590

RECEIVED
JUL 1 2019
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Re: Recall 19V-420 (2017-2018 MY Alfa Romeo Tire Pressure Placard Noncompliance per Federal Motor Vehicle Safety Standard 110) 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 recall V43 (NHTSA recall 19V-420) which involves the incorrect values of recommended tire pressures on the vehicle placard that do not meet the tire pressure recommendation requirements of S4.3(c) of Federal Motor Vehicle Safety Standard ("FMVSS") 110. The Noncompliance Information Report was submitted to the National Highway Traffic Safety Administration ("NHTSA") after FCA US determined that approximately 16,332 Alfa Romeo Giulia vehicles built between September 7, 2016 and August 2, 2018, had noncompliant recommended tire pressure inflation values. Three copies of the 49 CFR Part 573 Noncompliance Information Report for V43 (NHTSA recall 19V-420) filing are attached as Enclosure A.

Description of the Noncompliance

FCA US has determined that some 2017-2018 MY Alfa Romeo Giulia have a vehicle placard with incorrect tire pressures, resulting in a 49 CFR 571.110 (FMVSS 110) non-compliance.

FMVSS 110, S4.3, requires a permanently affixed vehicle placard to display the "[v]ehicle manufacturer's recommended cold tire inflation pressure for front, rear and spare tires." The pressure shown is required to be appropriate for the load limits. The recommended pressures are below the pressure required for the displayed load limits.

The rear 225/45R18 91W and 91V has an incorrect label pressure of 35psi, the correct label pressure is 36psi. The rear 225/40R19 93V has an incorrect label pressure of 38psi, the correct label pressure is 39psi. The rear 225/35R19 92W and 92Y has an incorrect label pressure of 33psi, the correct label pressure is 35psi.

ES19-002471

Justification for Petition for a Determination of Inconsequentiality

For the reasons discussed below, and supported by tire manufacturers data, FCA US submits that this technical noncompliance is inconsequential to motor vehicle safety:

- The incorrect pressure values are all within the range of acceptable tire inflation, and would not cause a Tire Pressure Monitoring System ("TPMS") alert.
 - The affected Alfa Romeo Giulia vehicles are FMVSS 138 compliant.
 - Consistent with FMVSS 138, the TPMS illuminates at equal to or less than the pressure 25 percent below the *correct* vehicle manufacturer's recommended cold inflation pressure. The TPMS warning telltale will illuminate prior to the tire pressure dropping to the range of 26-29 PSI on the affected Alfa Romeo Giulia vehicles, which is significantly above the 20 PSI requirement called out and tested to in FMVSS 139 (discussed below). FCA US believes the warning provided by the TPMS will give drivers ample time to check and inflate tires well before low tire inflation becomes a safety concern.
- The subject tires passed a low inflation pressure performance test.
 - The affected Alfa Romeo Giulia vehicles are equipped with tires that are FMVSS 139 compliant.
 - Tire manufacturers are required to certify the tires meet all applicable requirements of FMVSS 139.
 - FMVSS 139 specifies a low inflation pressure performance test in which the tire is loaded to its maximum tire load capacity and inflated to only 140 kPa (20 PSI), significantly less than the TPMS telltale activation pressure for the subject Alfa Romeo Giulia vehicles. In order to pass this test, the tires are loaded to 100% of the tire's maximum load carrying capacity and then run on a test axle for 1.5 hours at 20 PSI.
- FCA US is not aware of any crashes, injuries, or customer complaints associated with the condition.
- NHTSA has previously granted inconsequential treatment for FMVSS 110 noncompliance for incorrect vehicle placard values; see examples below
 - 2018 MY Buick Regal Docket No. NHTSA-2018-0054
 - 2016 MY Volkswagen Beetle Convertible Docket No. NHTSA-2016-0028
 - 2016-2017 MY Mercedes Benz GLE and GLS Docket No. NHTSA-2016-0143

It is the belief of FCA US that the information described above satisfies the intent of CFR 49 Part 556 and operators can safely utilize their vehicles for the intended purposes. FCA US believes that, pursuant to 49 CFR Part 556, 49 USC §30118(d) and §30120(h), the FMVSS 110 S4.3, vehicle placard recommended pressure noncompliance is inconsequential to motor vehicle safety and FCA US should be exempted from the notification and remedy requirements of 49 USC Chapter 301, "Motor Vehicle Safety" for the reasons supporting exemption cited above.

Vehicle placard values in unsold vehicles are being updated to reflect the correct pressure values.

In consideration of the foregoing demonstration that 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 black ink, appearing to read 'Thomas McCarthy', with a long horizontal flourish extending to the right.

Thomas McCarthy

Enclosure

CC: Mr. Joshua Neff

Acting Chief, Recall Management Division



Chrysler (FCA US LLC)

Vehicle Report

NHTSA ID: 19V420 Transaction ID: 19-00273-22754-10 (Original Report)

Required fields indicated with *

Manufacturer: Chrysler (FCA US LLC)

800 Chrysler Drive
Auburn Hills MI 48326-2757

FCA VSO/NHTSA FCA VSO/NHTSA
2485762579,

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

Vehicle Information

Alfa Romeo Giulia 2017 - 2018

* Model Yr. Start: 2017

* Model Yr. End: 2018

Type:

* Make: Alfa Romeo

Body Style: 4-DOOR

* Model: Giulia

Powertrain:

Production Dates Begin: 09/07/2016
End: 08/02/2018

Descriptive Information:

Some 2017-2018 MY Alfa Romeo Giulia vehicles have a tire placard label with incorrect tire pressures. The vehicle population was identified as 2017-2018 MY Giulia vehicles produced between September 7, 2016 and August 2, 2018 and equipped with the following rear tires: 225/45R18 91W and 91V, 225/40R19 93V and 225/35R19 92W and 92Y. Similar 2017-2018 MY Alfa Romeo Giulia vehicles not included in the recall were built with correct tire pressures on the tire placard label.

VIN Range(s): Begin: End:

Number potentially involved: 16332

Estimated percentage of involved with defect: 100%

Defect / Noncompliance Description

For this Defect/Noncompliance:

*** Describe the defect or noncompliance:**

FMVSS No. 110, Tire Selection, requires a tire placard to display the vehicle manufacturer's recommended cold tire inflation pressure for front, rear and spare tires. The pressure shown is required to be appropriate for the load limits displayed. Due to errors during the conversion from metric units to pounds per square inch ("PSI"), the recommended pressures shown on the tire placards in question are below the pressure required for the displayed load limits. Vehicles with rear 225/45R18 91W and 91V tires incorrectly display 35 PSI instead of the correct 36 PSI. Vehicle with rear 225/40R19 93V tires incorrectly display 37 PSI instead of the correct 39 PSI. Vehicles with rear 225/35R19 92W and 92Y tires incorrectly display 33 PSI instead of the correct 35 PSI.

If a noncompliance, provide the applicable FMVSS:

110 - Tire selection and rims

If applicable, provide any further FMVSS affected:

Describe the cause:

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:

Country:

Address 1:

Address 2:

City:

State:

Zip/Postal Code:

Company Contact Information

First Name:

Last Name:

Position:

Email:

Phone:

Chronology of Defect / Noncompliance Determination

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

On January 30, 2019, the Alfa Romeo Vehicle Safety & Regulatory Compliance ("AR VSRC") organization received information from the Chassis team about a possible issue with the pressure values listed on the tire placards. During the months of February through May, AR VSRC confirmed the misalignment between actual and correct tire pressure values related to three specific tire configurations for 2017-2018 MY Giulia vehicles. On May 31, 2019, Alfa Romeo determined, through the Vehicle Regulations Committee ("VRC"), to conduct a voluntary safety recall for the noncompliance to 49 CFR FMVSS 571.110.

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 affected vehicles to replace the tire placard label as needed. FCA US intends to timely petition NHTSA, pursuant to 49 CFR Part 556, for exemption from the notification and remedy requirements for sold vehicles due to the inconsequentiality of the noncompliance as it relates to motor vehicle safety. FCA US will only replace tire placard labels of unsold vehicles prior to sale/delivery, until NHTSA makes a determination regarding FCA US' petition pursuant to 49 CFR Part 556. 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: Label Part Description: Tire Placard Label Comment: Tire Placard Label

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

Identify the Recall Schedule

Describe the recall schedule for notifications:

**06/06/2019: FCA US plans to submit a petition for inconsequentiality on or before July 1, 2019. FCA US will notify dealers regarding unsold vehicles on or about July 26, 2019.

Planned Dealer Notification Begin Date:	07/26/2019
Planned Dealer Notification End Date:	07/26/2019
Planned Owner Notification Begin Date:	
Planned Owner Notification End Date:	

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

V43

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

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

Part 573 Safety Recall Report

19V-420

Manufacturer Name : Chrysler (FCA US LLC)**Submission Date :** JUN 06, 2019**NHTSA Recall No. :** 19V-420**Manufacturer Recall No. :** V43**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 : 16,332

Estimated percentage with defect : 100 %

Vehicle Information :

Vehicle 1 : 2017-2018 Alfa Romeo Giulia

Vehicle Type :

Body Style : 4-DOOR

Power Train : NR

Descriptive Information : Some 2017-2018 MY Alfa Romeo Giulia vehicles have a tire placard label with incorrect tire pressures. The vehicle population was identified as 2017-2018 MY Giulia vehicles produced between September 7, 2016 and August 2, 2018 and equipped with the following rear tires: 225/45R18 91W and 91V, 225/40R19 93V and 225/35R19 92W and 92Y. Similar 2017-2018 MY Alfa Romeo Giulia vehicles not included in the recall were built with correct tire pressures on the tire placard label.

Production Dates : SEP 07, 2016 - AUG 02, 2018

VIN Range 1 : Begin :

NR

End : NR

 Not sequential**Description of Noncompliance :**

Description of the Noncompliance : FMVSS No. 110, Tire Selection, requires a tire placard to display the vehicle manufacturer's recommended cold tire inflation pressure for front, rear and spare tires. The pressure shown is required to be appropriate for the load limits displayed. Due to errors during the conversion from metric units to pounds per square inch ("PSI"), the recommended pressures shown on the tire placards in question are below the pressure required for the displayed load limits.

Vehicles with rear 225/45R18 91W and 91V tires incorrectly display 35 PSI instead of the correct 36 PSI. Vehicle with rear 225/40R19 93V tires incorrectly display 37 PSI instead of the correct 39 PSI. Vehicles with rear 225/35R19 92W and 92Y tires incorrectly display 33 PSI instead of the correct 35 PSI.

FMVSS 1 : 110 - Tire selection and rims

FMVSS 2 : NR

Description of the Safety Risk : The affected tire placard labels have incorrect tire pressures which does not meet the requirements of FMVSS 110. FCA US LLC ("FCA US") believes that this noncompliance with FMVSS 110, in this instance, is inconsequential as it relates to motor vehicle safety, and intends to petition the NHTSA, pursuant to 49 CFR Part 556, for exemption from the notification and remedy requirements.

Description of the Cause : NR

Identification of Any Warning that can Occur : NR

Supplier Identification :

Component Manufacturer

Name : NR

Address : NR

NR

Country : NR

Chronology :

- On January 30, 2019, the Alfa Romeo Vehicle Safety & Regulatory Compliance ("AR VSRC") organization received information from the Chassis team about a possible issue with the pressure values listed on the tire placards.
- During the months of February through May, AR VSRC confirmed the misalignment between actual and correct tire pressure values related to three specific tire configurations for 2017-2018 MY Giulia vehicles.
- On May 31, 2019, Alfa Romeo determined, through the Vehicle Regulations Committee ("VRC"), to conduct a voluntary safety recall for the noncompliance to 49 CFR FMVSS 571.110.

Description of Remedy :

Description of Remedy Program : FCA US will conduct a voluntary safety recall on affected vehicles to replace the tire placard label as needed. FCA US intends to timely petition NHTSA, pursuant to 49 CFR Part 556, for exemption from the notification and remedy requirements for sold vehicles due to the inconsequentiality of the noncompliance as it relates to motor vehicle safety. FCA US will only replace tire placard labels of unsold vehicles prior to sale/delivery, until NHTSA makes a determination regarding FCA US' petition pursuant to 49 CFR Part 556.

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: Label

Part Description: Tire Placard Label

Comment: Tire Placard Label

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

Recall Schedule :

Description of Recall Schedule : **06/06/2019: FCA US plans to submit a petition for inconsequentiality on or before July 1, 2019. FCA US will notify dealers regarding unsold vehicles on or about July 26, 2019.

Planned Dealer Notification Date : JUL 26, 2019 - JUL 26, 2019

Planned Owner Notification Date : NR - NR

* NR - Not Reported