

Jennifer Shute
Director, Safety Compliance &
Product Analysis
FCA US LLC

October 14, 2021

Dr. Steven Cliff, Acting Administrator
National Highway Traffic Safety Administration
1200 New Jersey Ave. SE
Washington, DC 20590

RE: Recall 21V-730 (2018-2022 MY Alfa Romeo Stelvio Rearview Camera Display Noncompliance per Federal Motor Vehicle Safety Standard (“FMVSS”) No. 111) Petition for Determination of Inconsequential Noncompliance

Dear Dr. Cliff:

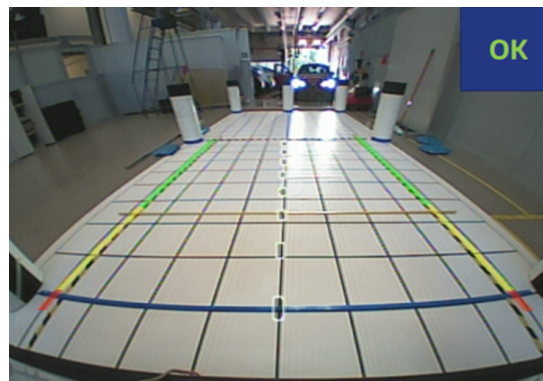
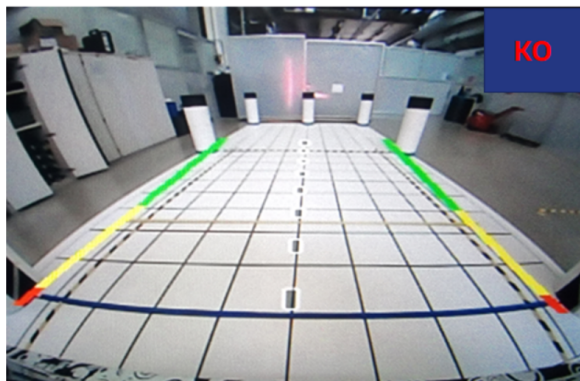
FCA US LLC (f/k/a Chrysler Group LLC) (“FCA US”) is a Delaware limited liability company with its principal place of business at 1000 Chrysler Drive, Auburn Hills, MI 48326.

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 noncompliance vehicle recall Y70 (NHTSA recall 21V-730) which involves a rearview camera display that includes dynamic guidelines which, in certain positions, may cover part of a required portion of a test object during FMVSS No. 111 testing. The Noncompliance Information Report was submitted to the National Highway Traffic Safety Administration (“NHTSA”) after FCA Italy SpA (“FCA Italy”) determined that 43,701 MY Alfa Romeo Stelvio vehicles, built between April 12, 2017 and August 27, 2021, may have been built with a noncompliant rearview camera display. Three copies of the 49 CFR Part 573 Noncompliance Information Report for Y70 (NHTSA recall 21V-730) filing are attached as Enclosure A.

Description of the Noncompliance

FCA Italy has determined that rearview cameras in some 2018-2022 MY Alfa Romeo Stelvio vehicles may have been built with a rearview camera display that includes dynamic guidelines which, in certain positions, may cover part of a required portion of a test object (less than 10%) during FMVSS No. 111 testing. Due to an incorrect calibration in certain vehicle configurations, the gridlines project the vehicle to be wider than it actually is which results in the gridlines partially covering the lower inside edges of the front test objects when the steering wheel is essentially straight. The “KO” image below shows the display seen during testing for the noncompliant vehicles and the “OK” image below shows the display from a correctly calibrated system. The gridlines are dynamic, which means that they move when the front wheels are turned to project the direction of travel of the vehicle when reversing based on the front wheel position. With a slight turn of the wheels in either direction, the portions of the test objects covered in testing conditions are visible.



Justification for Petition for a Determination of Inconsequentiality

FCA US submits that this technical noncompliance is inconsequential to motor vehicle safety for the following reasons:

- FMVSS No. 111 S2 states: “The purpose of this standard is to reduce the number of deaths and injuries that occur when the driver of a motor vehicle does not have a clear and reasonably unobstructed view to the rear.” For reasons discussed below FCA US submits that its noncompliance with this requirement does not create an unclear or unreasonably obstructed view to the rear and is therefore inconsequential to motor vehicle safety.
- FMVSS No. 111 S5.5.1 states: “Field of view. When tested in accordance with the procedures in S14.1, the rearview image shall include: (a) A minimum of a 150-mm wide portion along the circumference of each test object located at positions F and G specified in S14.1.4; and (b) The full width and height of each test object located at positions A through E specified in S14.1.4.”
 - Although the suspect gridlines do cover a small portion of the lower corners of the front test objects, the view to the rear is “clear and reasonably unobstructed.” The test objects are clearly visible and the obstruction created during FMVSS No. 111 testing is transitory based on the movement of the steering wheel during real-world use of the rearview camera system.
 - Further, the gridlines are positioned relative to the vehicle’s position, not to the test object or other objects shown in the display. As the vehicle begins to move rearward, the gridlines will also move rearward and the lower portions of the test objects, or any other objects, obstructed or partially obstructed by the gridlines will be displayed in full.
 - The gridlines do not significantly obstruct the view to the rear and are not large enough to obstruct an image of a person or object that could create an unreasonable risk to motor vehicle safety.
- NHTSA discussed overlays during its rulemaking process and acknowledged that overlays, such as gridlines, could provide safety-related benefits. See 79 FR 19178 at 19210: “The agency agrees with the commenters that video image overlays may have potential to add safety-related features to rear visibility systems. On the other hand, the agency is also conscious that such overlays have the potential to be applied to the rearview image in both safe and unsafe manners. Depending on their size, location, and orientation, overlays have the potential to create unsafe blind zones in the rearview image and to mask small obstacles, such as children.”



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- o While the gridlines in question do obstruct a small part (less than 10%) of two test objects during FMVSS No. 111 testing creating a noncompliant condition, the “size, location, and orientation” of the gridlines, in this instance, are not substantial enough to “create unsafe blind zones in the rearview image and to mask small obstacles, such as children.” This can clearly be seen by referencing the “KO” image above.
- Despite the technical noncompliance and considering the NHTSA’s comments during rulemaking, FCA US submits that the displayed view safely displays the image of the conditions to the rear of the vehicle and the gridlines provide an additional safety benefit while not obstructing the view of the objects in any meaningful way. The difference in the operation and effectiveness of the noncompliant rearview camera system operation is insignificant compared to the operation and effectiveness of the compliant version of the system.
- FCA Italy began vehicle production with compliant calibration of the rearview camera system on August 27, 2021.
- FCA US is not aware of any crashes, injuries, or customer complaints associated with the condition.

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,

Jennifer Shute
Director, Safety Compliance & Product Analysis
FCA US LLC

Vehicle Report

NHTSA ID: 21V730 Transaction ID: 21-00273-26670-10 (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 Stelvio 2018 - 2022

* **Model Yr. Start:** 2018 * **Model Yr. End:** 2022
* **Make:** Alfa Romeo
* **Model:** Stelvio

Type:
Body Style: SUV
Powertrain:

Production Dates Begin: 04/12/2017
 End: 08/27/2021

Descriptive Information:

Some 2018-2022 MY Alfa Romeo Stelvio vehicles may have been built with a rearview camera display that include dynamic guidelines which, in certain positions, may cover part of a required portion of a test object during Federal Motor Vehicle Safety Standard ("FMVSS") No. 111 testing. The suspect period began on April 12, 2017, when 2018 MY vehicle production began, and ended on August 27, 2021, when a new rearview camera with corrected gridlines was implemented in vehicle production. The suspect period was determined using vehicle production records. Vehicles not included in this recall are not equipped with the suspect rearview cameras or were built after the suspect period.

VIN Range(s): Begin: End:

Number potentially involved: 43701 **Estimated percentage of involved with defect:** 100%

Defect / Noncompliance Description

For this Defect/Noncompliance:

* Describe the defect or noncompliance:

FMVSS No. 111 S14.1 requires overlays generated automatically in the default rearview image at the beginning of the backing event cannot cover any of the required portions of the test objects. Suspect vehicles display dynamic gridlines, which in certain positions, may cover part of a required portion of a test object during FMVSS No. 111 testing.

If a noncompliance, provide the applicable FMVSS:

111 - Rearview mirrors

If applicable, provide any further FMVSS affected:

Describe the cause:

* Describe the safety risk:

FCA US LLC ("FCA US") believes that the noncompliance with FMVSS 571.111, in this instance, is inconsequential as it relates to motor vehicle safety, and intends to petition the NHTSA, pursuant to CFR Part 556, for exemption from the notification and remedy requirements.

Identify any warning which can precede or occur:

None

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: Robert Bosch GmbH
Country: Italy
Address 1: Colonna 35
Address 2:
City: Milano
State: FOREIGN STATES
Zip/Postal Code: 20149

Company Contact Information

First Name: Corsaro
Last Name: Fernando
Position: Technical Manager
Email: Fernando.corsaro@it.bosch.com
Phone: 393458703225

Involved Components

If the defect or noncompliance involves a specific component(s), identify that component(s) below.

Component Name: Camera, Rearview

Component Description: Rearview Camera

Component Part Number: 50562106

Chronology of Defect / Noncompliance Determination

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

• On September 8, 2021, FCA Italy SpA ("FCA Italy") Technical Safety and Regulatory Compliance recognized that certain rearview cameras had gridlines which covered a part of the required portion of test objects defined by FMVSS No. 111. • On September 14, 2021, FCA Italy determined, through its 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 intends to timely petition the NHTSA, pursuant to 49 CFR Part 556, for exemption from the notification and remedy requirements due to the inconsequentiality of the noncompliance as it relates to motor vehicle safety.

Describe what distinguishes the remedy component from the recalled component.

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

Identify the Recall Schedule

Describe the recall schedule for notifications.:

**09/21/2021: FCA US plans to submit a petition for inconsequentiality on or before 10/14/2021.

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):

Y70

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 0 documents associated with this report.

Part 573 Safety Recall Report

21V-730

Manufacturer Name : Chrysler (FCA US, LLC)**Submission Date :** SEP 21, 2021**NHTSA Recall No. :** 21V-730**Manufacturer Recall No. :** Y70**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 : 43,701

Estimated percentage with defect : 100 %

Vehicle Information :

Vehicle 1 : 2018-2022 Alfa Romeo Stelvio

Vehicle Type :

Body Style : SUV

Power Train : NR

Descriptive Information : Some 2018-2022 MY Alfa Romeo Stelvio vehicles may have been built with a rearview camera display that include dynamic guidelines which, in certain positions, may cover part of a required portion of a test object during Federal Motor Vehicle Safety Standard ("FMVSS") No. 111 testing.

The suspect period began on April 12, 2017, when 2018 MY vehicle production began, and ended on August 27, 2021, when a new rearview camera with corrected gridlines was implemented in vehicle production. The suspect period was determined using vehicle production records.

Vehicles not included in this recall are not equipped with the suspect rearview cameras or were built after the suspect period.

Production Dates : APR 12, 2017 - AUG 27, 2021

VIN Range 1 : Begin :

NR

End : NR

 Not sequential**Description of Noncompliance :**

Description of the Noncompliance : FMVSS No. 111 S14.1 requires overlays generated automatically in the default rearview image at the beginning of the backing event cannot cover any of the required portions of the test objects. Suspect vehicles display dynamic gridlines, which in certain positions, may cover part of a required portion of a test object during FMVSS No. 111 testing.

FMVSS 1 : 111 - Rear visibility

FMVSS 2 : NR

Description of the Safety Risk : FCA US LLC ("FCA US") believes that the noncompliance with FMVSS 571.111, in this instance, is inconsequential as it relates to motor vehicle safety, and intends to petition the NHTSA, pursuant to CFR Part 556, for exemption from the notification and remedy requirements.

Description of the Cause : NR

Identification of Any Warning that can Occur : None

Involved Components :

Component Name 1 : Camera, Rearview

Component Description : Rearview Camera

Component Part Number : 50562106

Supplier Identification :

Component Manufacturer

Name : Robert Bosch GmbH

Address : Colonna 35
Milano Foreign States 20149

Country : Italy

Chronology :

- On September 8, 2021, FCA Italy SpA ("FCA Italy") Technical Safety and Regulatory Compliance recognized that certain rearview cameras had gridlines which covered a part of the required portion of test objects defined by FMVSS No. 111.
- On September 14, 2021, FCA Italy determined, through its Vehicle Regulations Committee, to conduct a voluntary safety recall of the affected vehicles.

Description of Remedy :

Description of Remedy Program : FCA US intends to timely petition the NHTSA, pursuant to 49 CFR Part 556, for exemption from the notification and remedy requirements due to the inconsequentiality of the noncompliance as it relates to motor vehicle safety.

How Remedy Component Differs from Recalled Component : NR

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

Recall Schedule :

Description of Recall Schedule : **09/21/2021: FCA US plans to submit a petition for inconsequentiality on or before 10/14/2021.

Planned Dealer Notification Date : NR - NR

Planned Owner Notification Date : NR - NR

* NR - Not Reported