

INTRODUCTION

This is Issue No. 38 of "The Application of Federal and Canada Motor Vehicle Safety Standards/Regulations to Dodge trucks, SUVs, and minivans."

These pages discuss their respective Safety Acts, the Federal/Canada Motor Vehicle Safety Standards/Regulations (FMVSS/CMVSR), their applicability to the Multipurpose Passenger Vehicles (MPVs), trucks and buses manufactured by DaimlerChrysler Corporation and the standards that are in effect on September 1, 2000.

Revisions have been made to MVSS 105, 120, 135, 201, 203 (Canada), 208, 225, and CRFI (Canada) for the 2004 model year vehicles. Please reference current versions of these and all safety standards.

NOTICE TO DEALERS, DISTRIBUTORS AND OTHER PERSONS WHO ARE NOT EMPLOYEES OF DAIMLERCHRYSLER CORPORATION

The statements and other data contained herein are offered for informational purposes only, and are not intended to serve as a guide for conduct or action by anyone. Views or interpretations expressed herein merely represent opinions concerning certain effects of the National Traffic and Motor Vehicle Safety Act of 1966 and the Federal Motor Vehicle Safety Standards issued there under, except in those cases in which the act or standards are quoted verbatim. Please consult the entire Act and review all provisions of the standards with your legal counsel to determine your obligations.

SECTION I

THE SAFETY ACT UNITED STATES

Public Law 89-563, entitled "National Traffic and Motor Vehicle Safety Act of 1966" was enacted by Congress on September 9, 1966, with several amendments having been enacted thereafter.

Four basic obligations are imposed on manufacturers of automotive vehicles:

1. Vehicle must comply with applicable Federal Motor Vehicle Safety Standards (FMVSS).
2. Vehicle manufacturer must issue a certification of compliance.
3. Vehicle manufacturer must provide authorized government representatives access to manufacturing facilities and to records documenting compliance to applicable standards.
4. Vehicle manufacturer must furnish notification of any defect relating to motor vehicle safety or any noncompliance with a safety standard.

Unlike other federal, state or municipal regulatory legislation, this law controls the manufacture and sale of motor vehicles and not the application or operation of the vehicle. Compliance with the law affects the manufacturer, distributor, dealer, and anyone who completes a vehicle in all significant aspects and sells it to the end user. Therefore, it is extremely important that those involved in assembly, modification, distribution or selling of truck products become familiar with the law and related safety standards.

It is recommended that persons engaged in these activities who are not affiliated with DaimlerChrysler Corporation review the law and its obligations with their legal counsel. The law contains specific penalties. Violators of these provisions are subject to a civil penalty of up to \$5,000 per vehicle, or other violations up to a maximum of \$15,000,000 for related series of violations.

Copies of the "National Traffic and Motor Vehicle Safety Act of 1966" and the Federal Motor Vehicle Safety Standards may be obtained from any attorney, U.S. Congressman, or from the Superintendent of Documents, Washington, D.C.

THE SAFETY ACT — CANADA

Transport Canada has established Canada Motor Vehicle Safety Regulations (CMVSR) for various categories of motor vehicles and motor vehicle equipment under the provisions of the Motor Vehicle Safety Act, R.S.C. 1993. The Canadian standards generally coincide with those of the United States, except for speedometer callouts, cluster indicators, daytime running lamps, reflecting surfaces, steering control system, impact protection, occupant crash protection, occupant restraint systems, interior/exterior noise and radio interference (CRFI) requirements.

SECTION II

A. The 2005 standards

Below is a list of the safety standards applicable to 2005 Trucks and Multipurpose Passenger Vehicles that DaimlerChrysler Corporation manufactures.

FMVSS OR MCSR		Multipurpose Passenger Vehicles	Trucks
101	Controls and Displays	X	X
102	Transmission, Shift, Lever Sequence, Starter Interlock, etc.	X	X
103	Windshield Defroster and Defogging Systems	X	X
104	Windshield Wiping and Washing Systems	X	X
105	Hydraulic Brake Systems	As Applicable	As Applicable
106	Brake Hoses	X	X
108	Lamps, Reflective Devices, and Associated Equipment	X	X
110	Tire Selection & Rims	As Applicable	As Applicable
111	Rearview Mirrors	X	X
112	Headlamp Concealment Devices (if installed) (Canada only)	X	X
113	Hood Latch Systems	X	X
114	Theft Protection ⁽²⁾	X	X
115	Vehicle Identification Number (Canada only)	X	X
116	Motor Vehicle Brake Fluids	X	X
118	Power-Operated Window, Partition and Roof Panel Systems (if installed) ⁽²⁾	X	X
119	New Pneumatic Tires	X	X
120	Tire and Rim Selection	X	X
124	Accelerator Control Systems	X	X
125	Warning Devices ⁽³⁾	-	X
135	Hydraulic Brake Performance	As Applicable	As Applicable
201	Occupant Protection in Interior Impact ⁽²⁾	X	X
202	Head Restraints ⁽²⁾	X	X
203	Impact Protection for the Driver from the Steering Control System ⁽²⁾ (Canada only)	X	X
204	Steering Control Rearward Displacement ⁽⁴⁾	X	X
205	Glazing Materials	X	X
206	Door Locks and Door Retention Components	X	X
207	Seating Systems	X	X
208	Occupant Crash Protection	X	X
209	Seat Belt Assemblies	X	X
210	Seat Belt Assembly Anchorages	X	X
210.1	Tether Anchorages for Child Restraints (Canada)	X	X
212	Windshield Mounting ⁽⁵⁾	X	X
214	Side-Impact Protection ⁽⁶⁾ (static and dynamic)	X	X
216	Roof Crush Resistance ⁽⁷⁾	X	X
217	Bus Window Retention and Release	-	-
219	Windshield Zone Intrusion ⁽⁵⁾	X	X
225	225 Child Restraint Anchorage Systems (USA only)	X	X
301	Fuel System Integrity ⁽²⁾ (301.1 LPG and 301.2 CNG — Canada only)	X	X
302	Flammability of Interior Materials	X	X
303	Compressed Natural Gas Fuel System Integrity (USA only)	X	X
304	Compressed Natural Gas Fuel Containers (USA only)	X	X
	TOTAL	38	38

X = Standard applies.

(1) For 2004, DaimlerChrysler Corporation does not manufacture school buses. DaimlerChrysler does manufacture completed buses that can carry more than 10 passengers. These and other specific school bus standards (220, 221, and 222) apply to second-stage manufacturers converting Dodge Ram Conversion Vans into school buses. (2) 10,000-lb or less GVWR. (3) Greater than 10,000-lb GVWR. (4) 10,000-lb or less GVWR with 5,500-lb or less unloaded vehicle weight. (5) 10,000-lb or less GVWR; vehicles are tested to a maximum unloaded weight of 5,500-lb, forward control vehicles excluded. (6) 10,000-lb or less GVWR. For static and 6,000-lb or less GVWR for dynamic side-impact intrusion protection. Side door crush requirements apply to all doors except sliding door on Dodge Ram Vans. (7) 6,000-lb GVWR or less.

A. Definitions (Federal and Canada)

The following definitions are applicable to standards affecting multipurpose passenger vehicles, trucks and buses:

1. "Bus" means a motor vehicle with motive power except a trailer, designed for carrying more than 10 persons.
2. "Gross axle weight rating" (GAWR) means the value specified by the vehicle manufacturer as the load-carrying capacity of a single axle measured at the tire-ground interfaces.
3. "Gross vehicle weight rating" (GVWR) means the value specified by the manufacturer as the load weight of a single vehicle.
4. For Federal, "Incomplete vehicle" means an assemblage consisting, as a minimum, of frame and chassis structure, power train, steering system, suspension system, and brake system, to the extent that those systems are to be a part of the completed vehicle that requires further manufacturing operations, other than the addition of readily attachable components, such as mirrors or tire and rim assemblies, or minor finishing operations such as painting, to become a completed vehicle.

For Canada, an Incomplete vehicle is called "Chassis Cab" and is to mean a vehicle consisting of a chassis that is capable of being driven, drawn or self-propelled, upon which may be mounted a cab, and that is designed to receive (a) a passenger-carrying body including a body that incorporates a prime mover, or (b) a work-performing structure other than a fifth-wheel coupling.

5. "Multipurpose Passenger Vehicle" (MPV) means a motor vehicle with motive power, except a trailer, designed to carry 10 persons or less, that is constructed either on a truck chassis or with special features for occasional off-road operation.
6. "Overall width" refers to the nominal design dimensions of the widest part of the vehicle, exclusive of signal lamps, marker lamps, outside rearview mirrors, flexible fender extensions and mud flaps; determined with doors and windows closed, and the wheels in the straight-ahead position.
7. "School bus" means a bus that is sold or introduced in interstate commerce, for purposes that include carrying students to and from school or related events, but does not include a bus designed and sold for operation as a common carrier in urban transportation.
8. "Truck" means a motor vehicle with motive power, except a trailer, designed primarily for the transportation of property or special-purpose equipment.
9. "Unloaded vehicle weight" means the weight of a vehicle with maximum capacity of all fluids necessary for operation of the vehicle, but without cargo, occupants or accessories that are ordinarily removed from the vehicle when they are not in use.

SECTION III

**SAFETY COMPLIANCE
INFORMATION
COMPLETE VEHICLES**

A. Vehicle-Type Classification

The vehicle-type classifications for fully completed 2004 model year trucks and vans manufactured by DaimlerChrysler Corporation are as follows:

Vehicle	Type Classification
Ram 1500 2x4 and 4x4	Truck
Ram 2500 HD 2x4 and 4x4	Truck
Ram 3500 2x4 and 4x4	Truck
Dodge Dakota	Truck
Dodge Durango	MPV
Dodge Caravan/ Grand Caravan	MPV
Dodge Caravan/ Grand Caravan	Cargo Van

B. Certification Label

Vehicles manufactured by DaimlerChrysler Corporation will comply with applicable requirements of the standards insofar as permitted by the state of completion of the vehicle when shipped from the factory. Completed vehicles will be certified by DaimlerChrysler Corporation as complying with all applicable standards. This is accomplished by affixing a "permanent" label to each complete vehicle containing the following information:

- Name of Manufacturer
- Date of Manufacture
- Gross Vehicle Weight Rating (GVWR)*
- Gross Axle Weight Rating (GAWR)
- Tire Size(s), Rim Designations and Cold Inflation Pressures
- Compliance Statement
- Vehicle Identification Number (VIN)
- Type Classification of the Vehicle (i.e., Truck, MPV or Bus)

***NOTE:** The (GVWR) shall not be less than the sum of the unloaded vehicle weight, rated cargo load, and 150 pounds times the vehicle's designated seating capacity. The label will be affixed to the left front door lock pillar or inner door panel.

C. Subsequent Modifications of a Complete Vehicle

Complete vehicles, certified to be in compliance with all applicable standards, may be modified or altered, or have their vehicle-type classification changed prior to delivery of the vehicle, in its final form, to the end use. However, whoever modifies or alters the vehicle or changes its type classification is considered to be a vehicle alterer and is responsible for complying with the law and all applicable

standards. In addition, he must also certify on a vehicle alterer's certification label that the entire vehicle, in its final form, conforms to all applicable safety standards.

The following examples may serve to better illustrate these requirements:

Example 1. Removal of a component required for compliance from a complete and certified vehicle and the substitution of a different component, such as lamps, mirrors, glazing materials or windshield wiper arms and blades. The party making the changes is responsible for compliance of the substituted items and recertification of the vehicles.

Example 2. Addition of a slide-in camper unit to a complete and certified vehicle usually results in the vehicle in its final form becoming over 80" wide. The vehicle then would be required to comply with additional requirements in FMVSS/CMVSR 108. If the addition of the camper is made prior to the first sale of the basic vehicle, the party making the addition is responsible for compliance with the additional applicable standards.

Example 3. The modification or conversion of a complete and certified vehicle into another type of vehicle, such as a bus, an ambulance, a camper, or similar conversion, may change the type classification of the vehicle. For example, the addition of seats so that the vehicle has a seating capacity of more than 10 persons changes the vehicle's type classification from an MPV to a bus. The party performing the modification or conversion is responsible for compliance with the requirements applicable to the category of vehicle he has created and recertification of the vehicle. Additionally, this party is responsible for compliance of any components that have been altered or added. The addition of components covered by safety standards to a complete and certified vehicle, such as glazing materials, necessitates compliance with the applicable Federal/Canada Motor Vehicle Safety Standard/Regulation.

CAUTION: Modification of either complete or incomplete vehicles may also affect vehicle emissions. You should review your modifications to ensure that compliance with Federal, Canada and/or California Exhaust Emissions Regulations has not been affected.

SECTION IV

SAFETY COMPLIANCE INFORMATION INCOMPLETE VEHICLES

A. Vehicles — Type Classification

DaimlerChrysler Corporation manufactures several types of normally available incomplete vehicles. These include Dodge Ram 2500 HD and 3500 Pickup Trucks.

These vehicles can be completed by subsequent manufacturers into the following vehicle-type classifications:

Vehicle	Type Classification
Box Delete Trucks	Truck

Note: For 2004, All Heavy Duty Dodge Ram Pickups are equipped with Next Generation driver and front-passenger air bags.* Front-passenger air bag on/off switches will be installed on all Dodge Ram Pickups (excluding Quad Cab) as allowed by NHTSA rule making.

It is not appropriate to complete our chassis cab as buses or school buses.

In addition to the above incomplete vehicles, DaimlerChrysler Corporation from time to time will build other types of incomplete vehicles in response to purchaser request. These vehicles also are subject to federal regulation and as such will be accompanied by the documents described on the following pages. From these documents the subsequent manufacturer(s) will be able to determine into what type classification these vehicles can be appropriately completed, and the status of compliance of the incomplete vehicle with applicable safety standards.

*Certified to the Federal Regulations that allow less forceful air bags. Always use seat belts. Children 12 and under can be in the front seat only with the passenger air bag turned off Ram/Dakota pickups not including Dakota Quad Cab, or in the backseat of Durango, Dakota Quad Cab using an infant or child restraint system, or a seat belt that is right for their age and size.

B. Incomplete Vehicle Documents

When incomplete vehicles leave the factory they cannot be certified as complying with all applicable standards since certain required components have not been installed. Incomplete vehicles will be shipped with a document listing the standards in effect at the time of manufacture, followed by a statement concerning the degree of compliance with each standard listed. Included with the above-described document will be an incomplete vehicle label, which provides the following information:

- Name and Address of Manufacturer
- Date of Incomplete Vehicle Manufacture
- Vehicle Identification Number (VIN)
- Gross Vehicle Weight Rating (GVWR)
- Gross Axle Weight Rating (GAWR)
- Tire Size(s), Rim Designations and Cold Inflation Pressures
- Listing of the Vehicle Types (i.e., MPV or truck) into which the unit may appropriately be completed

The incomplete vehicle document and the incomplete vehicle label will be enclosed in a waterproof envelope attached to the steering column. In addition to the above compliance information, vehicles classified as chassis

cabs in the U.S.A. will have a "chassis cab certification label" applied to the left front door lock pillar. This label provides the following information:

- Status of compliance with respect to each applicable safety standard
- Name of Manufacturer
- Date of Manufacture

A. Compliance Status — Incomplete Vehicles

Dodge truck chassis cab models comply with all complete vehicle standards except FMVSS/CMVSR 108, portions of FMVSS 110 and 120, and FMVSS/CMVSR 111 as shown in the chart below, provided that the limitations set forth in the Incomplete Vehicle Documents are observed by subsequent manufacturers. Compliance with FMVSS/CMVSR 108 cannot be achieved for chassis cabs because certain rear lamp components must be body-mounted. Compliance to FMVSS/CMVSR 111 cannot be verified because the driver's view to the rear along both sides of the vehicle is affected by body width and configuration. Portions of FMVSS 110 and 120 including the labeling requirements cannot be completed until the final manufacturer completes his operations.

D. Federal and Canada Motor Vehicle Safety Standards/Regulations - Incomplete Vehicles

FMVSS OR MVSR	Standards	Trucks
101	Controls and Displays	X
102	Transmission, Shift, Lever Sequence, etc....	X
103	Windshield Defroster and Defogging Systems	X
104	Windshield Wiping and Washing Systems	X
105	Hydraulic Brake Systems	X
106	Brake Hoses	X
108	Lamps, Reflective Devices, etc....	X
111	Rearview Mirrors (if installed)	X
112	Headlamp Concealment Devices (if installed) (Canada only)	X
113	Hood Latch Systems	X
114	Theft Protection ⁽²⁾	X
115	Vehicle Identification Number (Canada only)	X
116	Motor Vehicle Brake Fluids	X
118	Power-Operated Window, Partition and Roof Panel Systems (if installed) ⁽²⁾	X
119	New Pneumatic Tires	X
120	Tire and Rim Selection	Partially / As Applicable
124	Accelerator Control Systems	X
125	Warning Devices ⁽³⁾	X
135	Hydraulic Brake Performance	X
201	Occupant Protection in Interior Impact ⁽²⁾	X
202	Head Restraints ⁽²⁾	X
203	Impact Protection for the Driver from the Steering Control System ⁽²⁾ (Canada only)	X
204	Steering Control Rearward Displacement ⁽⁴⁾	X
205	Glazing Materials	X
206	Door Locks and Door Retention Components	X
207	Seating Systems	X
208	Occupant Crash Protection	X
209	Seat Belt Assemblies	X
210	Seat Belt Assembly Anchorages	X
210.1	Tether Anchorages for Child Restraints (Canada)	X
212	Windshield Mounting ⁽⁵⁾	X
214	Side-Impact Protection ⁽⁶⁾ (static and dynamic)	X
216	Roof Crush Resistance ⁽⁷⁾	X
219	Windshield Zone Intrusion ⁽⁵⁾	X
225	225 Child Restraint Anchorage Systems (USA only)	X
301	Fuel System Integrity ⁽²⁾ (301.1 LPG and 301.2 CNG — Canada only)	X
302	Flammability of Interior Materials	X
303	Compressed Natural Gas Fuel System Integrity (USA only)	X
304	Compressed Natural Gas Fuel Containers (USA only)	X

(1) FMVSS 108 has different lighting requirements for vehicles under 80 inches in width than for vehicles 80 inches or more in width. The 2500 HD 4x2 and 4x4 chassis cab models with single rear tires are under 80 inches in width as manufactured. The 3500 chassis cab model with dual rear wheels and 3500 4x4 chassis cab model are 80 or more inches in width as manufactured. (2) Applicable to models with a GVWR of 10,000 lb or less. (3) Greater than 10,000 lb GVWR. (4) Applicable to models with an unloaded vehicle weight of 5,500 lb or less and a GVWR of 10,000 lb or less. (5) Applicable to models with a GVWR of 10,000 lb or less; vehicles are tested to a maximum of 5,500 lb. (6) 6,000 lb GVWR or less.

NOTE: It is the responsibility of any subsequent manufacturer who, in the process of his work, modifies, alters or removes any items installed by previous manufacturers covered by applicable Federal/Canada Motor Vehicle Safety Standards/Regulations to ensure function and compliance of these items with applicable requirements prior to the conclusion of his activity (I.e., Ref: 49CFR Part 568)