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To: Mr. David L. Strickland \*  
NHTSA Headquarters  
West Building  
1200 New Jersey Avenue, SE  
Washington, DC 20590  
202-366-4000

Date: 27 July 2012

VIA FEDEX GROUND 1283181-00003711

From: Mr. Paul V. Sheridan  
DDM Consultants  
22357 Columbia Street  
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313-277-5095 / [pvs6@Cornell.edu](mailto:pvs6@Cornell.edu)

**Subject: Alleged "Structural Protection" of Jeep Grand Cherokee Fuel Tank System**  
**Reference: EA12-005 File Update**

Courtesy Copy List

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\* Available with hyperlinks: <http://links.veronicachapman.com/Sheridan2Strickland-5.pdf>

\*\* By email or USPS (letter only)

DDM Consultants  
22357 Columbia Street  
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27 July 2012

VIA FEDEX AIRBILL # 8006-9341-5837

Mr. David L. Strickland, Administrator  
NHTSA Headquarters  
1200 New Jersey Avenue, SE  
Washington, DC 20590  
202-366-4000

**Subject:       Alleged “Structural Protection” of Jeep Grand Cherokee Fuel Tank System**  
**Reference:     EA12-005**

Dear Mr. Strickland:

I am writing to inform you of recent investigation activity I have conducted, which is prompted in-part by public/private statements made and testimony offered by Chrysler defense counsel, Chrysler dealership defense counsel, existing and former Chrysler employees, and various Chrysler product liability defense experts. These statements and testimony have alleged in a general sense that the “structure” in the rear of the Jeep Grand Cherokee offers crashworthiness to the rear-mounted, polyethylene fuel tank system. My investigation concentrated on the 1993-1998 ZJ-Body of the Jeep Grand Cherokee, but the following can also be applied to the 1999-2004 WJ-Body version; both of which are a portion of the referenced NHTSA engineering analysis.

The ruse that the “structure,” and to a lesser extent the rear bumper provides real-world crashworthiness is exacerbated by the appearance of the Jeep Grand Cherokee. That appearance, although aesthetically appealing, obscures the exact opposite reality. This is somewhat insidious when ostensibly inflicted upon the lay person (i.e. typical customer or bystander): The customer is essentially misled into perceiving that the fuel tank is protected by rear components, and most egregiously this perception may not even occur because the fuel tank location issue is esoteric for the typical lay person.

We first dispense with the rear bumper as it relates to the subject. To the best of my knowledge the ZJ rear bumper was never certified to offer the former minimal 2.5mph Insurance Institute for Highway Safety ([IIHS](#)) bumper rating. This is evidenced by the fact that the bumper uses a flimsy non-EAU mounting system. I have attached/enclosed photographs of the bumper, mounting bracket, and crash tests depicting this presumption.

But the focus of my recent investigations, which I will review in litigation, is the visual obscuration of non-existent structural protection, which is now alleged to offer fuel tank system crashworthiness (over FMVSS-301 compliance) to the ZJ-Body and WJ-Body vehicles. In support of EA12-005 I have attached eight PDF photo markups. Also, the enclosed cd contains all recent subject related photos (most in high resolution allowing for zoom inspection in a typical viewer program) for your review/file.

Please do not hesitate to contact me at any time.

Respectfully,

Paul V. Sheridan

Attachments/enclosure

**ZJ-Body Jeep Grand Cherokee:  
Typical Customer View (of Fuel Tank)**



**ZJ-Body Jeep Grand Cherokee:  
What Showroom Customer Would See if  
Fuel Tank was not colored to match rear  
underbody / rear suspension components.**





Approximate Lower Edge of "bumper," leaving over seven inches of fuel tank unprotected from direct or underride impact.

Open-ended frame rail where bumper bracket is inserted for mounting.

Unprotected Polyethylene fuel tank



Tire Size: LT235/75R15

Upper edge of "structure" at approximately 21.25 inches, which leaves over 7 inches of unprotected fuel tank; unprotected from/during up to 270 degrees of impact angles.

Approximate Lower edge of bumper

Distorted slightly by camera angle, lower portion of polyethylene fuel tank (for this vehicle) at approximately 14 inches above ground (when vehicle suspension is not burdened).

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ZJ-Body Rear Fuel Tank Fill  
Layout Underside View : fuel tank  
removed.

Frame Rail Hole for Fuel Tank Filler / Vent  
Hose for pass-through to Fuel Tank.

Left Side (inner surface) of Driver's Side Rear RIM Fascia.



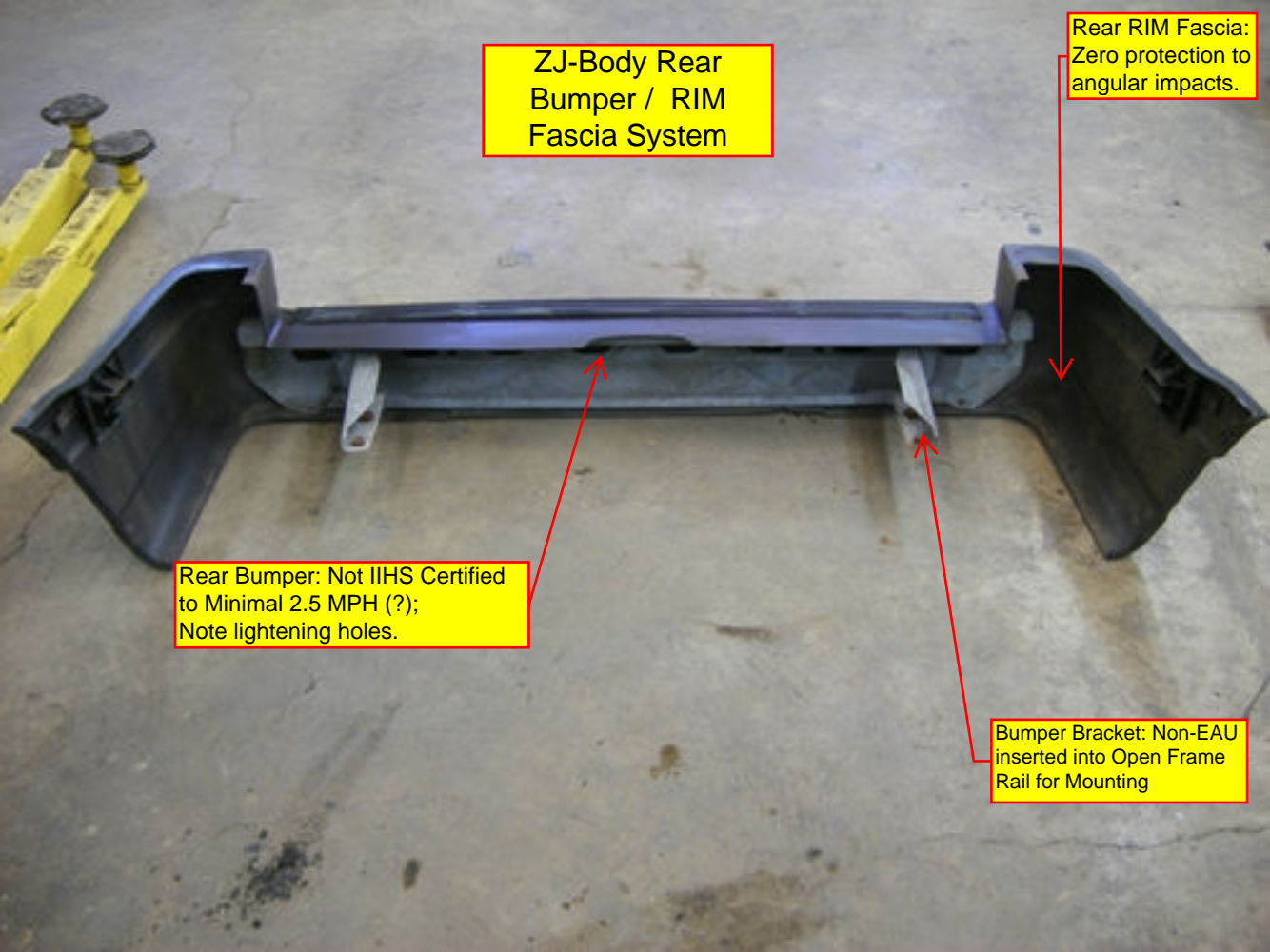


ZJ-Body Rear  
Bumper / RIM  
Fascia System

Rear RIM Fascia:  
Zero protection to  
angular impacts.

Rear Bumper: Not IIHS Certified  
to Minimal 2.5 MPH (?);  
Note lightening holes.

Bumper Bracket: Non-EAU  
inserted into Open Frame  
Rail for Mounting



**ZJ-Body Rear "Structure" / Bumper  
Fuel Tank Protection Performance  
Post Real World 40mph Impact.**



**Rear Bumper with lightening holes. High location of lower edge does not provide any direct impact protection for lower 7+ inches of polyethylene fuel tank. RIM Fascia covering exacerbates false impression of crash protection.**



**ZJ-Body Jeep Grand Cherokee Unprotected Fuel Tank System  
Real World Performance of Rear "Structure" and Bumper :  
Post 40mph impact test.**

# End of Document

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