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OF INFORMATION ACT (FOIA), 5 U.S.C. 552(B)(6)

Burke, VA

Nov 19, 2020

Administrator,  
National Highway Traffic Safety Administration  
1200 New Jersey Ave, SE  
Washington, DC 20690

Dear Sir or Madam,

I have enclosed a letter I wrote to the CEO of Ford regarding a serious safety issue pertaining to the Lane Keeping System's (LKS) operation while towing. I would appreciate NHTSA opening an investigation on the safety of the LKS on all vehicles that have the capability of towing. Specifically, when towing, the default setting for the LKS should be OFF. I have explained why in the enclosed letter to Ford Motor Company.

I have no reason to believe that Ford could have reasonably predicted this problem, and I ask that you work with them, as well as any other auto manufacturer, to design an effective solution. Only if your investigation finds that this problem was known and ignored or concealed, should there be any penalties assessed to the auto makers.

Technology can make autos safer, more comfortable, and increase convenience. Occasionally, there are times where it causes unforeseeable danger. I believe this is one of those times. Please have your engineers work with auto makers to address this problem.

I would appreciate a response from your agency once a suitable solution to this problem is decided by all parties. Thank you!



Burke, VA

Nov 19, 2020

Mr. James P. Hackett  
Chief Executive Officer, Ford Motor Company  
One American Road  
Dearborn, MI 48126

Dear Mr. Hackett,

I'm writing to notify you of a safety issue pertaining to Ford vehicles, that carries both serious property damage and deadly consequences. I will describe it below and I hope you will have your engineers address this. I don't expect every issue to be addressed in development, and I'm sure your engineering team will agree that something like this could be missed as I explain the situation below.

I would appreciate a reply from the company once your team has investigated this issue and found a solution. I've outlined several recommendations from which I hope your engineers can build upon. In addition, I will make myself available to any Ford representative who would like for me to demonstrate this problem.

FOR FORD'S ENGINEERS

This issue applies only to vehicles that have the lane keeping system that are also capable of towing.

I own a 2019 Ford Expedition, VIN 1FMUJ1JT6K [REDACTED] and I do enjoy the application of technology, such as with the ADAS – lane keeping system (LKS) and adaptive cruise control (ACC). I have not observed any problems with the ACC. However, there is a time when the LKS is extremely dangerous.

I also own a Heartland Mallard M32 camper trailer, which I tow with a weight distribution hitch. This RV unit is towable by the Expedition. When towing a unit this size, the driver has to make slight steering adjustments unique to towing due to road, weather, and traffic conditions. One must, for example, adjust for wind, harmonic resonance due to road bumps, Bernoulli effects when passing (or being passed by) other large vehicles. Being able to make slight, almost negligible, adjustments is critical to staying in your lane, keeping control of your vehicle, and avoiding the dreaded jackknife.

THE LANE KEEPING SYSTEM WORKS AGAINST THE DRIVER WHILE TOWING. When I'm towing, I have had wind pushing me in one direction, easily adjustable by slight turns in the opposite direction with the steering wheel. However, with the lane keeping system on, if you are too close to a lane line, the LKS will push the steering wheel in the opposite direction. If I need to adjust against the lane, I'm fighting the LKS. Furthermore, I can't tell the difference between LKS corrections, and the wind or other conditions that is causing the trailer to sway. This can whiplash the trailer into a dangerous sway, from which a driver may not be able to recover. From there, any variety of serious accidents can happen,

including death. This problem is made worse in rain, snow, steep hills, switchbacks, and any situation where friction between tire and road is reduced.

Your safety books and guides do not mention this problem. It is easily solved by turning off the LKS, which I have done, and recheck when hooking up for towing. However, you don't warn of this potential. I also believe it would be a good idea to update your software to turn off the LKS when the towing system detects a trailer – default for towing should be LKS OFF. With the amount of technology on vehicles today, drivers are easily overwhelmed and confused by all of the options available. It is imperative that Ford provide warnings, both in operating manuals, and on the dashboard, about how unsafe it is to tow with LKS on. A recall for software updates should be able to accomplish this.

I cannot imagine a situation where a driver would want to override LKS in the OFF position when towing. I feel as if the driver should be allowed to tow with it on at his choice, however this is only in the name of freedom of choice. I will defer to your engineers on whether or not to allow this feature.

I'm asking that you to take this action for any vehicle with LKS that is capable of towing, whether it is a hitch-attached trailer, or a truck bed mounted fifth wheel trailer. This likely includes Escapes, the new Ranger, Explorers, and the entire line of F-series pickups.

I have approximately 92,000 miles of towing experience with RV's and other trailers, and towed in a variety of situations which would make the average driver a panicked mess. Switchbacks, Tioga pass, snow, driving rain, steep grades with rocks/gravel, I have done it all.

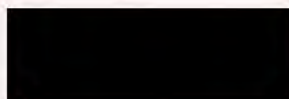
Please look into this. Although it's impossible to measure accidents that don't happen, rest assured you will prevent many. In addition, should there be an accident, I believe this issue will likely be taken up in legal proceedings. I hope that by solving the root cause of this problem, we can prevent any such unfortunate situation. I have taken care of it with my Ford, but I know that there are many towing drivers that may not understand the depth of this problem until after an accident that can be easily prevented.

With all of the new RV and camper owners this year due to COVID-19, I imagine that this issue has the potential to present itself in the form of an accident sooner rather than later.

Please also share this with the other auto makers – GM, FiatChrysler, Nissan, and anyone else who may be making towing vehicles with such features.

I write to you with safety and accident prevention in mind, ask respectfully request that you take this information to make Ford vehicles as safe as they can possibly be.

Sincerely,

A solid black rectangular box used to redact the signature of the sender.



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NHTSA  
1200 New Jersey Ave SE  
Washington, DC 20690

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