

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. L.W. Camp
Automotive Safety Engineering Standards Office
Ford Motor Company
Fairlane Plaza South, Suite 400
330 Town Center Drive
Dearborn, MI 48126

NSA-111sjm
SQ99-001

Dear Mr. Camp:

The Office of Defects Investigation (ODI) of the National Highway Traffic Safety Administration (NHTSA) reviews technical service bulletins and other communications submitted by manufacturers of motor vehicles and items of motor vehicle equipment for potential safety-related matters. ODI has reviewed technical service bulletin No. 98-23-5, which identifies a problem that can result in the overhead console separating from the ceiling on certain 1998 Ford Windstar vehicles. Although the console is located above and between the driver and passenger seat, ODI has received a complaint in which the owner alleges that when the console detached from the ceiling, it not only deflected off the right temple area of his head, but it came to rest in the middle portion on the windshield partially obstructing his field of vision. A copy of the complaint and the service bulletin are enclosed for your review.

The purpose of this letter is to understand the basis for Ford Motor Company to initiate a service bulletin rather than conducting a safety campaign and to evaluate any safety consequences associated with this type of failure.

In order to perform this analysis and to better understand the basis for Ford's actions, certain additional information is requested. For purposes of this information request, the following terms are defined:

- **Ford**: the Ford Motor Company, and all of its divisions, subsidiaries, and affiliated enterprises, including, but not limited to, any distributors of Ford products. The term also includes all headquarters, regional, zone, or other offices of Ford, or any of its divisions, subsidiaries, and affiliated enterprises, and all officers, employees, agents, contractors, and consultants of Ford or any of its divisions, subsidiaries, or affiliated enterprises.

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- **Service bulletin:** refers to the condition(s) described in service bulletin No. 98-23-5 which the overhead console is loose or hangs down.
- **Subject vehicles:** 1998 Windstar model vehicles and any other vehicles equipped with an overhead console.
- **Overhead console:** shall include all fixture(s) or attachment(s) affixed to the ceiling area above and/or between the driver and passenger seating position, or in the surrounding vicinity of the driver and passenger's head and any securing parts and hardware used on the subject vehicle.
- **Alleged defect:** any condition that would cause the overhead console to separate from the mounting fixture or become detached for the ceiling.

INSTRUCTIONS

In order for my staff to evaluate the performance of this safety recall, certain information is required. Pursuant to 49 U.S.C. § 30166, please provide numbered responses to the following requests, repeating the request verbatim above each response. Ford is required to respond to each request separately. Some requests require written response, some require the production of documents, and some require both. Where documents are produced, the documents shall be produced in an identified, organized manner that corresponds with the information request (including the subparts).

Where documents are produced and the documents would not, standing alone, be self-explanatory, (e.g., that does not identify what is being tested or reference a test methodology) the production of the document(s) shall be supplemented and accompanied by an explanation, with reference(s) to the document(s), so that the document(s) speak for themselves.

The submitted information is to include, but not be limited to, all written reports or documents; transcriptions, notes, or other documentation of oral communications; and information transmitted or contained in electronic or other storage media. The term documents is used in the broadest sense of the word and shall mean all original written, printed, typed, recorded, or graphic matter of every kind, nature, and description. Furnish all requested items, whether or not Ford has verified each one, including all papers, letters, correspondence, memoranda, communications, electronic mail messages (existing in hard copy or in electronic storage), faxes, telegrams, telex messages, photographs, film, notes, working papers, and other records pertaining or relating to each item, whether in draft or finalized. Also, any document, record, film, or photograph originally in color must be reproduced in color. In all cases where documents are in a language other than English, Ford must submit a copy of each non-English document and an English translation of the document.

1. Furnish the number of subject vehicles Ford has sold in the United States by model year, make, model.

2. State the number and provide copies of all the following, from all sources, of which Ford is aware and which relate, or could relate to the alleged defect in the subject vehicles:
 - a. owner complaints;
 - b. field reports;
 - c. crash/incident claims;
 - d. subrogation claims;
 - e. lawsuits; and
 - f. third-party arbitration proceedings (where Ford is a party to the arbitration).

Please list and collate your response for each category ("a" through "f") by date of claim. Please provide for each item in this response the incident date, mileage of vehicle at time of incident (if known), approximate age of vehicle or model year, disposition of matter, and, where a fleet vehicle is involved, the name of the fleet, and the name and telephone number of a contact person at that fleet. For items "a" through "d," please provide all related information and reports whether or not Ford has verified each one. For items "e" and "f," summaries are acceptable. Please identify in the summary the caption, court, docket number, and filing date of each lawsuit if a copy of the complaint initiating the lawsuit is not provided.

3. If Ford has issued any other service or technical bulletins, advisories, or other communications to dealers, zone offices, or field offices pertaining to the alleged defect in the subject vehicles, provide a copy of each such document. If no such documents have been issued, so state.
4. State the number of warranty claims, including extended warranty claims, and requests for "good will," field, or zone adjustments received by Ford that relate to the alleged defect in the subject vehicles, by model, model year, model series code, calendar month, and problem claim code. Each problem claim code must be identified. Also, provide a **copy** of each report.
5. Identify and provide copies of all documents pertaining to any studies, surveys, and investigations pertaining to the alleged defect that is known to Ford. Include all pertinent documents, regardless of whether they are in interim, draft, or final form.
6. Furnish a chronological summary of events which led to the issuance of service bulletin number 98-23-5.
7. Provide an illustration showing the location of the overhead console relative to the driver and passenger seating area. Also, identify the dimensions and weight of the overhead console and its attached components.
8. Provide a power distribution diagram showing each electrical circuit attached to the overhead console.

9. Identify and describe each and every modification or change made by, on behalf of, or known to Ford in the design, material composition, supplier, manufacture, testing, quality control, or installation of the overhead console, and all components thereof, originally installed in, or which can be installed in, the subject vehicles. The following information must be included for each modification or change:
 - a. the date, or approximate date on which the modification or change was incorporated into production;
 - b. a description of the modification or change;
 - c. the reason for the modification or change;
 - d. the part number of the modified part;
 - e. identify the suppliers of the original and the replacement parts;
 - f. whether the original unmodified component was withdrawn from sale, and if so, when; and
 - g. whether the modified or changed components can be interchanged with earlier production components.
10. Furnish Ford's opinion of the alleged defect.
11. Identify what action Ford intends to take on this matter.

Ford's response to this letter, in duplicate, must be submitted to this office April 30, 1999. Please include in your response the identification codes referenced on page 1 of this letter. If you find that you cannot provide all of the requested information within the time allotted, you must request an extension no later than 5 working days prior to the date on which your response is due. You may telephone me at (202) 366-5226 to request an extension, but must confirm your request in writing. If circumstances prevent you from submitting all information requested by the due date, you must submit by that date whatever information you then have available.

If you consider any portion of your response to be confidential information, submit that material to this office in a separate enclosure marked "Confidential." In addition, 49 CFR Part 512, "Confidential Business Information," requires that manufacturers "submit two copies of the document containing allegedly confidential information (except only one copy of blueprints) and one copy of the documents from which information claimed to be confidential has been deleted to the Office of Chief Counsel, National Highway Traffic Safety Administration, Room 5219, 400 Seventh Street, SW, Washington, DC 20590. Include the name, address, and telephone number of a knowledgeable company representative for receipt of a response from the Chief Counsel under this part. Ford is required to provide to the Office of the Chief Counsel supporting information for the request for confidential treatment as described in Part 512.

If you have any questions concerning this matter, please contact Mr. Sonny Murianka of my staff at (202) 366-5196.

Sincerely,

Jonathan D. White, Chief
Recall Analysis Division Office of Defects

Investigation

Safety Assurance

2 Enclosures:

TSB No. 98-23-5

Consumer complaint ODI No. 539945

NHTSA:NSA:ODI

NSA-111:SMuriank:kjs:6-5227:2-9-99

cc:NSA-11 Subject/Chron/JWhite

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