

**EA02-025**

**FORD 10/27/03**

**APPENDIX N**

**BOOK 14 OF 61**

**PART 1 OF 3**

PE 98-005 183

PE 98-055

1073



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L. W. Camp  
Director  
Automotive Safety Office  
Environmental And Safety Engineering

Ford Motor Company  
330 Town Center Drive  
Dearborn, Michigan 48126 USA

March 11, 1999

Mr. Thomas Z. Cooper, Chief  
Vehicle Integrity Division  
Office of Defects Investigations  
National Highway Traffic  
Safety Administration  
400 Seventh Street, S. W.  
Washington, DC 20590

Dear Mr. Cooper:

Subject: PE98-055:NSA12jfa

This letter completes Ford's response to the agency's November 24, 1998 letter concerning the subject investigation by providing additional information in response to Request No. 3. As the agency is aware, Ford is conducting an extensive investigation into this issue. We will keep the agency informed as that investigation progresses.

If you have any questions concerning this response please contact me.

Very truly yours,

Attachment

3713 0007

FORD'S RESPONSE TO PE98-055 Request No. 3

Ford's response to this Preliminary Evaluation inquiry was prepared pursuant to a diligent and good faith search for the information requested. While we have employed our best good faith efforts to provide responsive information, the breadth of the Agency's request and the requirement that information be provided on an expedited basis makes this a difficult task. We nevertheless have made every effort to provide thorough and accurate information and we would be pleased to meet with Agency personnel to discuss any aspect of this inquiry.

The scope of Ford's investigation conducted to locate responsive information focused on Ford employees most likely to be knowledgeable about the subject matter of this inquiry, and to reviewing Ford files in which responsive information ordinarily would be expected to be found and to which Ford ordinarily would refer, as more fully described in this response. To the extent that the Agency's definition of Ford includes suppliers, contractors and affiliated enterprises for which Ford does not exercise day-to-day operational control, we note that information belonging to such entities ordinarily is not in Ford's possession, custody or control. Ford has construed this request as pertaining to vehicles manufactured for sale in the United States.

Responses to your specific numbered requests follow. As requested, after each numeric designation, we have set forth verbatim the request for information, followed by our response to it.

Request No. 2

State the number incidents, known to Ford, in which the alleged defect has been reported to have occurred in the subject vehicles. Furnish copies of all documents, from any and all sources, including documents which may not originally have been submitted to Ford, which are in Ford's possession or control, or of which it is otherwise aware, that pertain, in any way, to any of these incidents. This should include, but is not limited to, all documents possessed by Ford, or of which it is otherwise aware, pertaining to the reports included with this letter. Furnish all documents whether or not Ford has verified the validity of each document. For each incident in this response please provide the vehicle owner's name, address, and telephone number; and identify all vehicles by vehicle identification number, model year, date of manufacture, date of retail sale, date of incident, mileage at the time of the incident, and problem description. For all incidents involving lawsuits please identify the caption, court, docket number, and filing date of each lawsuit and a copy of the complaint document initiating the lawsuit. Sort all incidents by cause and area or component of origin.

Request No. 3

State the total number vehicles sold in the United States by model name and model year that have engine compartment (sic) configurations (i.e., components and component location, wiring harnesses and harness location) the same as the subject vehicles. Provide a response to question number two for all vehicles identified in your answer to this question.

Answer

In accordance with the agency's January 11, 1999 letter and a January 21, 1999 telephone discussion between Ford Automotive Safety Office personnel and Messrs. Cooper and Abbott of NHTSA, Ford and the agency identified four components located in left side under hood of the subject vehicles which are of interest to the agency. The components identified were as follows:

1. Switch - speed control deactivation
2. Relay center
3. 12A581 wiring harness which connects to the EEC
4. EDIS ignition module.

Additional study of these components was conducted by Ford to determine their usage, package location, and design level. In a follow up telephone discussion on February 9 between Ford Automotive Safety Office personnel and Messrs. Cooper and Abbott of NHTSA, Ford and the agency agreed that vehicles using the speed control deactivation switch with a part number of F2VC-9F924-\*\*, vehicles with a 12A581 wiring harness that functions with a 60 pin EEC connector and has the relay center integrated as a part in assembly, and vehicles using an EDIS-8 the Electronic Distributorless Ignition System module (EQIS-8 12K072) are to be considered those vehicles as having "specific components identified" as described in the agency's January 11 letter. Therefore, Ford's response to Request Nos. 2 and 3 focuses on the vehicles with the "specific components...identified...following examination of vehicles."

A matrix of vehicles with the above identified components and the production volumes, as agreed to in the February 9, conversation with the agency, was provided in Appendix I to our February 15, 1999 response. Subsequent to our February 15, 1999 response we learned that a speed control deactivation switch with a part number F2AC-9F924-\*\* was also used in 1992-1993 model year Lincoln Town Cars and the vehicles already identified in Appendix I to our February 15 letter. The F2AC switch was used interchangeably with the F2VC switch; the vehicles identified in the matrix are correct and no other Ford vehicles use the F2AC or F2VC switch.

The following contains additional information that relates to the second part of Request No. 3, "Provide a response to question number two for all vehicles identified in your answer to this question."

For purposes of identifying reports of incidents potentially involving the alleged defect and any related documents, Ford has gathered "owner reports" and "field reports" maintained by Ford Customer Service Division ("FCSD"), and claim and lawsuit information maintained by Ford's Office of the General Counsel ("OGC").

Owner Reports. As the agency is aware, within FCSD's North American Customer Service Operations, there is a Customer Assistance Center ("CAC") that is responsible for facilitating communication between customers, dealerships and Ford Motor Company. Among other things, the CAC handles telephonic, electronic (via the Internet), and written inquiries, suggestions, informational requests, and concerns ("contacts") from Ford and Lincoln-Mercury vehicle owners about their vehicles or sales and service processes. The contacts are handled by CAC customer service representatives, who enter a summary of the customer contact into a database known as MORS (Master Owner Relations System). Certain contacts, such as letters from customers, are entered into the MORS database and also are copied to microfilm, or more recently, imaged and stored electronically.

The CAC assigns to each vehicle-related contact report a "symptom code" or category that generally reflects the nature of the customer contact or vehicle concern, as described by the owner. The CAC does not undertake to confirm the accuracy of the description provided by the owner; they simply record what is reported. Therefore, given the complexity of the modern motor vehicle, it is Ford's experience that a significant percentage of owner contacts do not contain sufficient information to make a technical assessment of the condition of the vehicle or the cause of the event reported. Accordingly, although MORS contact reports may be useful in identifying potential problems and trends, the records are not the empirical equivalent of confirmed incidents and/or dealership's diagnosis. The MORS database maintains customer contact information for five years.

In responding to this information request, Ford electronically searched MORS contact reports dated through February 17, 1999 for 1994-1997 model year Crown Victoria and Grand Marquis, 1996-1997 model year Lincoln Town Car, and 1993-1995 model year Lincoln Mark VIII vehicles with symptom codes 203\*\*\* (Electrical/Charging System-Low Charge, High Charge, Inoperative, Noise, Indicator, Wiring/Basic- Attachment, Routing, Trailer, Starting System-Drive Engage, Slow Crank, Ignition Switch, Inoperative, Noise, Battery-Low Fluid, Broken Terminal, Case Cracked, Leaks, Won't Hold Charge, Auxiliary (Dual), Circuit Protection-Fuse Box Internal, Distribution Box (External)); 301\*\*\* (Chassis/Service Brake System-ABS

Indicator, Noisy-Front, Rear, Front and Rear, Drag-Front, Rear, Front and Rear, Pull-Left, Right, Left or Right, Lock-Up/Grab-Front, Rear, Front and Rear, Pedal-Appearance, Attachment, ABS Self Actuating, High Efforts, Soft/Spongy, Pulsates, Low Pedal, Noise, Inoperative/Ineffective-Front, Rear, Front and Rear, Excessive Wear-Front, Rear, Front and Rear, Leaks-Air Pressure, Fluid); 304\*\*\* (Chassis/Suspension System/Suspension Ride Quality-Harsh, Soft/Float, Bottoming, Lean/Sag/Height-Both Ends Low, Both Ends High, Front Low, Front High, Leans Left, Leans Right, Suspension Dog Tracking, Suspension Leaks, Suspension Noise-Front, Rear, Both, Suspension Indicator, Suspension Shocks/Struts- Leaks); 403\*\* (Exhaust System Visual Smoke-Blue, Black, White); 404\*\*\* (Exhaust System/Fuel System/Leaks-Filter Area, Tank/Seams area, Filler Neck, Gas Cap Area, Pump/Seal Area, Lines, Tank Selector, Fuel System Odor-Engine Compartment, Passenger Compartment, Truck, Exterior, Fuel System Noise-Pump Assembly, Tank Area, Engine Compartment, Passenger Compartment, Trunk Area, Exterior, Fuel System Slow Fill, Fuel System Attachment- Filter, Tank, Filler Neck/Cap, Injector, Fuel System Routing-Filter, Tank, Filler Neck/Cap, Injector, Fuel System Expulsion/Press-When Refueling, When Running, When Turned Off, Fuel System Indicator-Low Fuel); 499\*\*\* (Engine Noise/Basic Engine/Engine General Concern, Appearance, Appearance Corrosion, Attach/Mounting, Missing Comps., Misassembly, Mechanical Failure, Indicator Check Engine); 704\*\*\* (Unknown Source/Fire Smoke/Visible Flame-Coll. Related, Trunk, Cargo/Bed Area, Passenger Area, Underhood, Under Vehicle, Fire/Smoke/Smoke-Coll. Related, Trunk, Cargo/Bed Area, Passenger Area, Underhood, Under Vehicle, Fire/Smoke Scorched/Burnt-Coll. Related, Trunk, Cargo/Bed Area, Passenger Area, Underhood, Under Vehicle); 705\*\*\* (Unknown Source/Odor/ Underhood, Trunk Area, Passenger Compartment, Under Vehicle, Cargo/Bed Area). The electronic search was performed with Concordance full-text information retrieval software, using the following search terms: smoke\*, fire, flam\*, burn\*, melt\*, thermal, underhood, smolder\*, hot, overheat\*, smell\*, odor\* and computer generated variations of those words. Contact reports obtained from the electronic search were reviewed for allegations concerning all under hood fires or other "thermal anomalies," from any source or origin, of any description, level, degree, or magnitude, occurring in the left, or drivers side, of the engine compartment, including fires in the area of the left front wheel, or left front fender. To the extent that the above records reflect reports or allegations of under hood fires or "thermal anomalies" occurring in the left, or the driver side which may relate to the "specific components," one report is contained in Appendix I-1 for the 1994-1997 model year Crown Victoria and Grand Marquis. No similar owner reports were located for the 1996-1997 model year Lincoln Town Car and 1993-1995 model year Lincoln Mark VIII vehicles.



March 11, 1999

Ford has also included owner reports which describe under hood fires but are ambiguous as to the cause or origin of the fire or whether they may relate to the above-mentioned components. Nineteen such owner reports are contained in Appendix I-B for the 1994-1997 model year Crown Victoria and Grand Marquis, two such owner reports are contained in Appendix II-B for the 1996-1997 model year Lincoln Town Car Vehicles and one such owner report is contained in Appendix III-B for the 1993-1995 model year Lincoln Mark VIII vehicles.

Ford has also included owner reports which described full vehicle fires but are ambiguous as to the alleged cause or origin of the fire or whether they may relate to the above-mentioned components. Thirty-three such owner reports are contained in Appendix I-C for the 1994-1997 model year Crown Victoria and Grand Marquis and two such owner reports are contained in Appendix II-C for the 1996-1997 model year Lincoln Town Car vehicles. No similar owner reports were located for the 1993-1995 model year Lincoln Mark VIII vehicles.

Ford has also included owner reports of other fires or "thermal anomalies," of any description, level, degree, or magnitude, occurring under hood in which it is alleged that the source of the fire was other than one of the "specific components." We have provided these owner reports in Appendix I-D for the 1994-1997 model year Crown Victoria and Grand Marquis and in Appendix II-D for the 1996-1997 model year Lincoln Town Car and in Appendix III-D for the 1993-1995 model year Lincoln Mark VIII vehicles as "non-specific allegations" for your review because of the broad scope of the request. Based on our judgment, the information in the reports in Appendices I-B, II-B, III-B, I-C, II-C, III-C, I-D, II-D, and III-D is insufficient to support a determination that they pertain to the alleged defect. We have not provided reports with specific allegations of smoke or burnt front brakes, brake rotors, calipers, etc. that initiate in a wheel well and not under hood.

For consistency, the four categories, Appendix \*-A through \*-D, used for classifying documents as they may relate to Request No. 2 will be used for all types of reports (owner, field, lawsuit, and claim) addressed in this response. When no documents have been identified, the appendix will exist, but contain only a statement that there are no responsive reports.

In the interest of responding promptly to this inquiry, Ford has not undertaken to gather the microfilm or electronic images related to these contacts because of the largely duplicative nature of the information contained in the microfilm and images, as well as the time and the burden associated with locating and producing those documents. The pertinent information related to those contacts generally would be included in the contact reports obtained from the MORS system. To the extent that those documents exist, they are reflected in the "Micro Nbr:" field of the MORS contact reports. Upon request, Ford will attempt to locate any specific items that are of interest to the agency.

3713 0012

Field Reports. Within FCSD, there is a Vehicle Service & Programs Office that has overall responsibility for vehicle service and technical support activities, including the administration of field actions. That Office is the primary source within Ford of vehicle concern information originating from Ford and Lincoln-Mercury dealerships, field personnel, and other sources. The information is maintained in a database known as the Common Quality Indicator System ("CQIS"). The CQIS database includes reports compiled from more than 40 Company sources (e.g., Company-owned vehicle surveys, service technicians, field service and quality engineers, and technical hot line reports, etc.) providing what is intended to be a comprehensive concern identification resource. As with MORS contact reports, CQIS reports are assigned a "symptom code" or category that generally reflects the nature of the concern. The CQIS database maintains information for five years.

In responding to this information request, Ford electronically searched CQIS reports dated through February 11, 1999 for 1994-1997 model year Crown Victoria and Grand Marquis, 1996-1997 model year Lincoln Town Car, and 1993-1995 model year Lincoln Mark VIII vehicles with the following symptom codes: Electrical/Start/Charge/Charging System-Other, Low Charge, High Charge, Inoperative, Noise, Indicator, Not Listed; Wiring-Basic-Other, Attachment, Routing, Insul/Shielding, Trailer, Not Listed; Starting System-Other, Drive Engage, Slow Crank, Ignition Switch, Air Systems, Inoperative, Noise, Not Listed; Battery-Other, Low Fluid, Broken Terminal, Case Cracked, Leaks, Won't Hold Charge, Auxiliary (Dual), Not Listed; Circuit Protection-Other, Fuse Box (Interior), Distribution Box (Exterior), In-Line Fuse, In-Line Breaker, Fuse Link, Diode, Relay, Resistor, Not Listed); 301\*\*\* (Chassis/Service Brake/Indicator-Other, Red Only, Amber Only, Red/Amber Only, Not Listed; Other-Other; Noisy-Other, Front, Rear, Front and Rear; Drag-Other, Front, Rear, Front and Rear; Pull-Other, Left, Right, Left or Right; Lock-Up/Grab-Other, Front, Rear, Front and Rear, Not Listed; Pedal-Other, Appearance, Attachment, ABS Self Act., High Efforts, Soft/Spongy, Pulsates, Low Pedal, Noise, Not Listed; Inoperative/Ineffective-Other, Front, Rear, Front and Rear, Not Listed; Excessive Wear-Other, Front, Rear, Front and Rear; Leaks-Other Air Pressure-Vacuum, Fluid, Not Listed; Not Listed Service Brake-Other, Not Listed); 304\*\*\* chassis/Suspension/Other-Other; Ride Quality-Other, Harsh, Soft/Float, Bottoming, Not Listed; Lean/Sag/Haight-Other, Both Ends Low, Both Ends High, Front Low, Front High, Leans Left, Leans Right; Dog Tracking-Other, Rear Tracks Left, Rear Tracks Right; Leaks-Other, Not Listed; Noise-Other, Front, Rear, Both, Not Listed; Indicator-Other, Not Listed; Shocks/Struts-Other, Leaks, Not Listed; Not Listed Suspension-Other, Not Listed); 403\*\*\* Engine/Exhaust System/Visual Smoke-Other, Blue, Black, White, Not Listed); 404\*\*\* Engine/Fuel System/Other-Other; Leaks-Other, Filter Area, Tank/Seams Area, Filler Neck, Gas Cap Area, Rail/Injector, Carburetor Area, Pump Seal Area, Lines, Tank Selector, Evaporative System, Not Listed; Odor-Other, Engine Compartment, Passenger Compartment, Trunk, Exterior, Not Listed; Noise-Other, Pump Assembly, Lines, Tank Area, Engine

Compartment, Passenger Compartment, Trunk Area, Exterior, Not Listed; Slow Fill-Other, Not Listed; Attachment-Other, Not Listed; Filter, Tank, Filler, Neck/Cap, Fuel Rail/Regulator, Injector Carburetor, Pump Assembly, Lines; Routing-Other, Not Listed; Filter, Tank, Filler Neck/Cap; Fuel Rail/Regulator, Injector, Carburetor, Pump Assembly, Lines; Expulsion/Press-Other, When Refueling, When Running, When Turned Off, Not Listed; Indicator-Other, Low Fuel, Not Listed; Not Listed Fuel System-Other, Not Listed); 409\*\*\* Engine/Power Components/Other-Other; Block-Other, Not Listed; Head-Other, Not Listed; Crank-Other, Not Listed; Cam-Other, Not Listed; Rod-Other, Not Listed; Piston-Other, Not Listed; Ring-Other, Not Listed; Oil Pump-Other, Not Listed; Power Components-Other, Not Listed); 499\*\*\* (Engine/General Concern/Other-Other; Appearance-Other, Corrosion, Not Listed; Attach/Mounting-Other, Concern Not Listed; Misassembly-Other, Mounts/Dampers, Not Listed; Mechanical Failure-Other, Concern Not Listed; Other-Other, Not Listed); 704\*\*\* (Unknown Source/Fire/Smoke/Other-Other; Visible Flame-Other, Coll. Related, Trunk, Cargo/Bed Area, Passenger Area, Under hood, Under Vehicle, Not Listed; Smoke-Other, Coll. Related, Trunk, Cargo/Bed Area, Passenger Area, Under hood, Under Vehicle, Not Listed; Not Listed Fire/Smoke-Other, Listed); 705\*\*\* (Unknown Source/Odor/Other-Other, Under hood-Other, Not Listed; Trunk Area-Other, Not Listed; Passenger Compartment-Other, Not Listed, Under Vehicle-Other, Not Listed; Cargo/Bed Area-Other, Not Listed); and containing the computer search terms: smoke, fire, flame, burn, melt, thermal, and computerized variations of those words. Reports were reviewed for allegations concerning all under hood fires or other thermal anomalies, from any source or origin, of any description, level, degree, or magnitude, occurring in the left, or drivers side, of the engine compartment, including fires in the area of the left front wheel, or left front fender. To the extent that the above records reflect reports or allegations of under hood fires or thermal anomalies occurring in the left, or the driver side which may relate to the "specific components," one field report is contained in Appendix IV-A for the 1994-1997 model year Crown Victoria and Grand Marquis vehicles. No similar field reports were located for the 1996-1997 model year Lincoln Town Car or 1993-1995 model year Lincoln Mark VIII vehicles.

Ford has also included field reports which describe under hood fires but are ambiguous as to the cause or origin of the fire or whether they may relate to the above-mentioned components. Seven such field reports are contained in Appendix IV-B for the 1994-1997 model year Crown Victoria and Grand Marquis; and one such field report is contained in Appendix V-B for the 1996-1997 model year Lincoln Town Car vehicles. No similar field reports were located for the 1993-1995 model year Lincoln Mark VIII vehicles.

Ford has also included field reports which describe under hood fires but are ambiguous as to the cause or origin of the fire or whether they may relate to the above-mentioned components. Five such field reports are contained in Appendix IV-C for the 1994-1997 model year Crown Victoria and Grand Marquis and two such field reports are contained in Appendix V-C for the 1996-1997 model year Lincoln Town Car vehicles. No similar field reports were located for the 1993-1995 model year Lincoln Mark VIII vehicles.

Ford has also included field reports of other fires or "thermal anomalies," of any description, level, degree, or magnitude, occurring under hood in which it is alleged that the source of the fire was other than one of the "specific components." We have provided these reports in Appendix IV-D for the 1994-1997 model year Crown Victoria and Grand Marquis and in Appendix V-D for the 1996-1997 model year Lincoln Town Car, and in Appendix VI-D for the 1993-1995 model year Lincoln Mark VIII vehicles as "non-specific allegations" for your review because of the broad scope of the request. Based on our judgment, the information in the reports in Appendices IV-B, V-B, VI-B, IV-C, V-C, VI-C, IV-D, V-D, and VI-D is insufficient to support a determination that they pertain to the alleged defect. We have not provided reports with specific allegations of smoke or burnt front brakes, brake rotors, calipers, etc. that reside in the wheel well and not under hood.

As requested, a listing of the above identified reports has been prepared and is provided in Appendix VII.

Lawsuits and Claims. Ford's Office of the General Counsel ("OGC") is responsible for handling product liability lawsuits and claims and consumer breach of warranty lawsuits against the Company.

Ford understands this request to only seek a copy of the complaint for these lawsuits. Therefore, Ford is providing, to the extent available, a copy of the complaint. Upon request, Ford also would be glad to produce to the agency Ford's answer to the complaint, Plaintiff's responses to Ford's and/or other parties' discovery requests, Ford's responses to Plaintiff's discovery requests, documents produced in discovery, Plaintiff's medical records, police/fire department/emergency medical service reports, vehicle recall history, vehicle warranty history, owner communications with Ford, photographs, and/or non-privileged vehicle inspections and expert reports.

Based on a reasonable and diligent search, no lawsuits, two claims, and no consumer breach of warranty lawsuits potentially related to the alleged defect in the "specific components" were located in the search.

To the extent that the lawsuit records reflect reports or allegations of under hood fires or "thermal anomalies" occurring in the left, or the driver side which may relate to the "specific components identified," no lawsuit complaints were located for the 1994-1997 model year Crown Victoria and Grand Marquis, 1996-1997 model year Lincoln Town Car, or 1993-1995 model year Lincoln Mark VIII vehicles.

Ford has also included lawsuit complaints which describe under hood fires but are ambiguous as to the cause or origin of the fire or whether they may relate to the above-mentioned components. One such lawsuit complaint is contained in Appendix VIII-B for the 1994-1997 model year Crown Victoria and Grand Marquis. No similar lawsuit complaints were located for the 1996-1997 model year Lincoln Town Car or 1993-1995 model year Lincoln Mark VIII vehicles.

No lawsuit complaints which described full vehicle fires but are ambiguous as to the alleged cause or origin of the fire or whether they may relate to the above-mentioned components were located for the 1994-1997 model year Crown Victoria and Grand Marquis, 1996-1997 model year Lincoln Town Car, or 1993-1995 model year Lincoln Mark VIII vehicles.

Ford has also included lawsuit complaints of other fires or "thermal anomalies," of any description, level, degree, or magnitude, occurring under hood in which it is alleged that the source of the fire was other than one of the "specific components." We have provided these reports in Appendix VIII-D for the 1994-1997 model year Crown Victoria and Grand Marquis vehicles. No such complaints were located for 1996-1997 model year Lincoln Town Car or 1993-1995 model year Lincoln Mark VIII vehicles. Based on our judgment, the information in these Appendices VIII-B, VIII-C, and VIII-D is insufficient to support a determination that they pertain to the alleged defect. We have not provided reports with specific allegations of smoke or burnt front brakes, brake rotors, calipers, etc. that initiate in the wheel well and not under hood.

For each claim, Ford is providing, to the extent available, the claimant's medical records, police/fire department/emergency medical service reports, vehicle recall history, vehicle warranty repair history, owner communications with Ford, photographs, claim disposition notification, Ford requests for information to claimant, non-privileged vehicle inspections and expert reports, and the owner or his/her attorney's description of incident/claim and accompanying information.

March 11, 1999

To the extent that the above records reflect reports or allegations of under hood fires or "thermal anomalies" occurring in the left, or the driver side which may relate to the "specific components," two claims are contained in Appendix IX-A for the 1996-1997 model year Lincoln Town Car vehicles. No such claims were located for the 1994-1997 model year Crown Victoria and Grand Marquis or the 1993-1995 model year Lincoln Mark VIII vehicles.

Ford has also included claims which described under hood fires but are ambiguous as to the cause or origin of the fire or whether they may relate to the above-mentioned components. One such claim is contained in Appendix IX-B for the 1994-1997 model year Crown Victoria and Grand Marquis and one claim is contained in Appendix IX-B for the 1996-1997 model year Lincoln Town Car vehicles. No such claims were located for the 1993-1995 model year Lincoln Mark VIII vehicles.

Ford has also included claims which describe full vehicle fires but are ambiguous as to the alleged cause or origin of the fire or whether they may relate to the above-mentioned components. Two such claims are contained in Appendix IX-C for the 1994-1997 model year Crown Victoria and Grand Marquis and one claim is contained in Appendix IX-C for the 1993-1995 model year Lincoln Mark VIII vehicles. No such claims were located for the 1996-1997 model year Lincoln Town Car vehicles.

Ford has also included claims of other fires or "thermal anomalies," of any description, level, degree, or magnitude, occurring under hood in which it is alleged that the source of the fire was other than one of the "specific components." We have provided these reports in Appendix IX-D for the 1994-1997 model year Crown Victoria and Grand Marquis, 1996-1997 Lincoln Town Car, and 1993-1995 model year Lincoln Mark VIII vehicles as "non-specific allegations" for your review because of the broad scope of the request. Based on our judgment, the information in Appendices IX-B, IX-C, and IX-D is insufficient to support a determination that they pertain to the alleged defect. We have not provided claims with specific allegations of smoke or burnt front brakes, brake rotors, calipers, etc. that reside in the wheel well and not under hood.

A listing of the identified lawsuits and claims has been provided in Appendix X.

Responsive documents that are privileged or attorney work product are reflected on the Privilege Log contained in Appendix X.

3713 0017

March 11, 1999

We note that the Agency's definition of Ford includes Ford's outside law firms. However, to the extent that Ford retained law firms in connection with the claims and lawsuits identified above, any files maintained by Ford's law firms ordinarily would contain voluminous duplicative documentation and take months to gather and process. Nevertheless, in the interest of ensuring the thoroughness of our production, we have contacted the law firms which handled the claims identified and asked them to provide, to the extent available, copies of documents produced in discovery and non-privileged reports of vehicle inspections and experts. As a result of this search, no additional documents were located. Ford understands this request to only seek a copy of the complaint for the lawsuits identified above, so Ford has not included similar information from its law firms' files related to those lawsuits.

A search of Ford's litigation prevention files located five files relating to a specific owner reports and has been provided in Appendix I-B.

Ford is providing additional information in Appendix XI which relates to lawsuit claims information previously provided in our January 22 and February 15 submissions to the agency.

3713 0018



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L. W. Camp  
Director  
Automotive Safety Office  
Environmental And Safety Engineering

Ford Motor Company  
330 Town Center Drive  
Dearborn, Michigan 48126

February 15, 1999

Mr. Thomas Z. Cooper, Chief  
Vehicle Integrity Division  
Office of Defects Investigations  
National Highway Traffic  
Safety Administration  
400 Seventh Street, S. W.  
Washington, DC 20590

Dear Mr. Cooper:

Subject: PE98-055:NSA12jfa

This letter supplements Ford's January 22, 1999 response concerning the subject agency investigation by providing additional information in response to Request No. 3. As the agency is aware, Ford is continuing to gather information necessary to complete our response to Request No. 3 for other models and model years of potentially affected vehicles. We expect to be able to provide additional information by March 12, 1999.

If you have any questions concerning this response please contact me.

Very truly yours,

  
L. W. Camp

Attachment

3713 0019



FORD'S RESPONSE TO #393-055 Request No. 1

Ford's response to this Preliminary Evaluation inquiry was prepared pursuant to a diligent and good faith search for the information requested. While we have employed our best good faith efforts to provide responsive information, the breadth of the Agency's request and the requirement that information be provided on an expedited basis makes this a difficult task. We nevertheless have made every effort to provide thorough and accurate information and we would be pleased to meet with Agency personnel to discuss any aspect of this inquiry.

The scope of Ford's investigation conducted to locate responsive information focused on Ford employees most likely to be knowledgeable about the subject matter of this inquiry, and to reviewing Ford files in which responsive information ordinarily would be expected to be found and to which Ford ordinarily would refer, as more fully described in this response. To the extent that the Agency's definition of Ford includes suppliers, contractors and affiliated enterprises for which Ford does not exercise day-to-day operational control, we note that information belonging to such entities ordinarily is not in Ford's possession, custody or control. Ford has construed this request as pertaining to vehicles manufactured for sale in the United States.

Responses to your specific numbered requests follow. As requested, after each numeric designation, we have set forth verbatim the request for information, followed by our response to it.

Request No. 2

State the number incidents, known to Ford, in which the alleged defect has been reported to have occurred in the subject vehicles. Furnish copies of all documents, from any and all sources, including documents which may not originally have been submitted to Ford, which are in Ford's possession or control, or of which it is otherwise aware, that pertain, in any way, to any of these incidents. This should include, but is not limited to, all documents possessed by Ford, or of which it is otherwise aware, pertaining to the reports included with this letter. Furnish all documents whether or not Ford has verified the validity of each document. For each incident in this response please provide the vehicle owner's name, address, and telephone number; and identify all vehicles by vehicle identification number, model year, date of manufacture, date of retail sale, date of incident, mileage at the time of the incident, and problem description. For all incidents involving lawsuits please identify the caption, court, docket number, and filing date of each lawsuit and a copy of the complaint document initiating the lawsuit. Sort all incidents by cause and area or component of origin.

Request No. 3

State the total number vehicles sold in the United States by model name and model year that have engine compartment (sic) configurations (i.e., components and component location, wiring harnesses and harness location) the same as the subject vehicles. Provide a response to question number two for all vehicles identified in your answer to this question.

Answer

In accordance with the agency's January 11, 1999 letter and a January 21, 1999 telephone discussion between Ford Automotive Safety Office personnel and Messrs. Cooper and Abbott of NHTSA, Ford and the agency identified four components located in left side under hood of the subject vehicles which are of interest to the agency. The components identified were as follows:

- 1. Switch.- speed control deactivation
- 2. Relay center
- 3. 12A581 wiring harness which connects to the EEC
- 4. EDIS ignition module.

Additional study of these components was conducted by Ford to determine their usage, package location, and design level. In a follow up telephone discussion on February 9 between Ford Automotive Safety Office personnel and Messrs. Cooper and Abbott of NHTSA, Ford and the agency agreed that vehicles using the speed control deactivation switch with a part number of P2VC-9P924-\*\*, vehicles with a 12A581 wiring harness that functions with a 60 pin EEC connector and has the relay center integrated as a part in assembly, and vehicles using an EDIS-8 the Electronic Distributorless Ignition System module (EQIS-8 12K072) are to be considered those vehicles as having "specific components identified" as described in the agency's January 11 letter. Therefore, Ford's response to Request Nos. 2 and 3 focuses on the vehicles with the "specific components...identified...following examination of vehicles."

A matrix of vehicles with the above identified components, as agreed to in the February 9, conversation with the agency, is contained in Appendix I. Information provided on this matrix also contains the approximate number of the identified vehicles produced for sale in the United States.

The following information relates to the second part of Request No. 3, "Provide a response to question number two for all vehicles identified in your answer to this question."

For purposes of identifying reports of incidents potentially involving the alleged defect and any related documents, Ford has gathered "owner reports" and "field reports" maintained by Ford Customer Service Division ("FCSD").

and claim and lawsuit information maintained by Ford's Office of the General Counsel ("OGC").

Owner Reports. As the agency is aware, within FCSD's North American Customer Service Operations, there is a Customer Assistance Center ("CAC") that is responsible for facilitating communication between customers, dealerships and Ford Motor Company. Among other things, the CAC handles telephonic, electronic (via the Internet), and written inquiries, suggestions, informational requests, and concerns ("contacts") from Ford and Lincoln-Mercury vehicle owners about their vehicles or sales and service processes. The contacts are handled by CAC customer service representatives, who enter a summary of the customer contact into a database known as MORS (Master Owner Relations System). Certain contacts, such as letters from customers, are entered into the MORS database and also are copied to microfilm, or more recently, imaged and stored electronically.

The CAC assigns to each vehicle-related contact report a "symptom code" or category that generally reflects the nature of the customer contact or vehicle concern, as described by the owner. The CAC does not undertake to confirm the accuracy of the description provided by the owner; they simply record what is reported. Therefore, given the complexity of the modern motor vehicle, it is Ford's experience that a significant percentage of owner contacts do not contain sufficient information to make a technical assessment of the condition of the vehicle or the cause of the event reported. Accordingly, although MORS contact reports may be useful in identifying potential problems and trends, the records are not the empirical equivalent of confirmed incidents and/or dealership's diagnosis. The MORS database maintains customer contact information for five years.

In responding to this information request, Ford electronically searched MORS contact reports dated through December 4, 1998 for 1992 and 1993 model year Crown Victoria and Grand Marquis and 1991, 1994-1995 Lincoln Town Car vehicles with symptom codes 203\*\*\* (Electrical/Charging System-Low Charge, High Charge, Inoperative, Noise, Indicator, Wiring/Basic- Attachment, Routing, Trailer, Starting System- Drive Engage, Slow Crank, Ignition Switch, Inoperative, Noise, Battery-Low Fluid, Broken Terminal, Case Cracked, Leaks, Won't Hold Charge, Auxiliary (Dual), Circuit Protection-Fuse Box Internal, Distribution Box (External)); 301\*\*\* (Chassis/Service Brake System-ABS Indicator, Noisy-Front, Rear, Front and Rear, Drag-Front, Rear, Front and Rear, Pull-Left, Right, Left or Right, Lock-Up/Grab-Front, Rear, Front and Rear, Pedal-Appearance, Attachment, ABS Self Actuating, High Efforts, Soft/Spongy, Pulsates, Low Pedal, Noise, Inoperative/ Ineffective-Front, Rear, Front and Rear, Excessive Wear-Front, Rear, Front and Rear, Leaks-Air Pressure, Fluid); 304\*\*\* (Chassis/Suspension System/Suspension Ride Quality-Marsh, Soft/Float, Bottoming, Lean/Sag/Height-Both Ends Low, Both Ends

High, Front Low, Front High, Leans Left, Leans Right, Suspension Dog Tracking, Suspension Leaks, Suspension Noise-Front, Rear, Both, Suspension Indicator, Suspension Shocks/Struts- Leaks); 403\*\* (Exhaust System Visual Smoke-Blue, Black, White); 404\*\*\* (Exhaust System/Fuel System/ Leaks-Filter Area, Tank/Seams area, Filler Neck, Gas Cap Area, Pump/Seal Area, Lines, Tank Selector, Fuel System Odor-Engine Compartment, Passenger Compartment, Truck, Exterior, Fuel System Noise-Pump Assembly, Tank Area, Engine Compartment, Passenger Compartment, Trunk Area, Exterior, Fuel System Slow Fill, Fuel System Attachment- Filter, Tank, Filler Neck/Cap, Injector, Fuel System Routing-Filter, Tank, Filler Neck/Cap, Injector, Fuel System Expulsion/Press-Whan Refueling, When Running, When Turned Off, Fuel System Indicator-Low Fuel); 499\*\*\* (Engine Noise/Basic Engine/Engine General Concern, Appearance, Appearance Corrosion; Attach/Mounting, Missing Comps., Misassembly, Mechanical Failure, Indicator Check Engine); 704\*\*\* (Unknown Source/Fire Smoke/Visible Flame-Coll. Related, Trunk, Cargo/Bed Area, Passenger Area, Underhood, Under Vehicle, Fire/Smokes/Smoke-Coll. Related, Trunk, Cargo/Bed Area, Passenger Area, Underhood, Under Vehicle, Fire/Smoke Scorched/Burnt-Coll. Related, Trunk, Cargo/Bed Area, Passenger Area, Underhood, Under Vehicle); 705\*\*\* (Unknown Source/Odor/ Underhood, Trunk Area, Passenger Compartment, Under Vehicle, Cargo/Bed Area). The electronic search was performed with Concordance full-text information retrieval software, using the following search terms: smoke\*, fire, flame\*, burn\*, melt\*, thermal, underhood, smolder\*, hot, overheat\*, smell\*, odor\* and computer generated variations of those words. Contact reports obtained from the electronic search were reviewed for allegations concerning all under hood fires or other "thermal anomalies," from any source or origin, of any description, level, degree, or magnitude, occurring in the left, or drivers side, of the engine compartment, including fires in the area of the left front wheel, or left front fender. To the extent that the above records reflect reports or allegations of under hood fires or thermal anomalies occurring in the left, or the driver side which may relate to the "specific components," four reports are contained in Appendix II-A for the 1992 and 1993 model year Crown Victoria and Grand Marquis and four reports are contained in Appendix III-A for the 1991, 1994-1995 model year Lincoln Town Car Vehicles.

Ford has also included owner reports which describe under hood fires but are ambiguous as to the cause or origin of the fire or whether they may relate to the above-mentioned components. Sixteen reports are contained in Appendix II-B for the 1992 and 1993 model year Crown Victoria and Grand Marquis and fifteen reports are contained in Appendix III-B for the 1991, 1994-1995 model year Lincoln Town Car Vehicles.

Ford has also included owner reports which described full vehicle fires but are ambiguous as to the alleged cause or origin of the fire or whether they may relate to the above-mentioned components. Twenty-four reports are contained in Appendix II-C for the 1992 and 1993 model year Crown Victoria

and Grand Marquis and fifteen reports are contained in Appendix III-C for the 1991, 1994-1993 model year Lincoln Town Car Vehicles.

Ford has also included owner reports of other fires or "thermal anomalies," of any description, level, degree, or magnitude, occurring under hood in which it is alleged that the source of the fire was other than one of the "specific components." We have provided these reports in Appendix II-D for the 1992 and 1993 model year Crown Victoria and Grand Marquis and in Appendix III-D for the 1991, 1994-1993 model year Lincoln Town Car Vehicles as "non-specific allegations" for your review because of the broad scope of the request. Based on our judgment, the information in the reports in Appendices II-B, III-B, II-C, III-C, II-D, and III-D is insufficient to support a determination that they pertain to the alleged defect. We have not provided reports with specific allegations of smoke or burnt front brakes, brake rotors, calipers, etc. that reside in the wheel well and not under hood.

For consistency, the four categories, Appendix \*-A through \*-D, used for classifying documents as they may relate to Request No. 2 will be used for all types of reports (owner, field, lawsuit, and claim) addressed in this response. When no documents have been identified, the appendix will exist, but contain only a statement that there are no responsive reports.

In the interest of responding promptly to this inquiry, Ford has not undertaken to gather the microfilm or electronic images related to these contacts because of the largely duplicative nature of the information contained in the microfilm and images, as well as the time and the burden associated with locating and producing those documents. The pertinent information related to those contacts generally would be included in the contact reports obtained from the MORS system. To the extent that those documents exist, they are reflected in the "Micro Nbr:" field of the MORS contact reports. Upon request, Ford will attempt to locate any specific items that are of interest to the agency.

Field Reports. Within FCSD, there is a Vehicle Service & Programs Office that has overall responsibility for vehicle service and technical support activities, including the administration of field actions. That Office is the primary source within Ford of vehicle concern information originating from Ford and Lincoln-Mercury dealerships, field personnel, and other sources. The information is maintained in a database known as the Common Quality Indicator System ("CQIS"). The CQIS database includes reports compiled from more than 40 Company sources (e.g., Company-owned vehicle surveys, service technicians, field service and quality engineers, and technical hot line reports, etc.) providing what is intended to be a comprehensive concern identification resource. As with MORS contact reports, CQIS reports are assigned a "symptom code" or

category that generally reflects the nature of the concern. The CQIS database maintains information for five years.

In responding to this information request, Ford electronically searched CQIS reports dated through December 8, 1998 for 1992 and 1993 model year Crown Victoria and Grand Marquis and 1991, 1994-1995 Lincoln Town Car vehicles with the following symptom codes: Electrical/Start/Charge/Charging System-Other, Low Charge, High Charge, Inoperative, Noise, Indicator, Not Listed; Wiring-Basic-Other, Attachment, Routing, Insul/Shielding, Trailer, Not Listed; Starting System-Other, Drive Engage, Slow Crank, Ignition Switch, Air Systems, Inoperative, Noise, Not Listed; Battery-Other, Low Fluid, Broken Terminal, Case Cracked, Leaks, Won't Hold Charge, Auxiliary (Dual), Not Listed; Circuit Protection-Other, Fuse Box (Interior), Distribution Box (Exterior), In-Line Fuse, In-Line Breaker, Fuse Link, Diode, Relay, Resistor, Not Listed; 301\*\*\* (Chassis/Service Brake/Indicator-Other, Red Only, Amber Only, Red/Amber Only, Not Listed; Other-Other; Noisy-Other, Front, Rear, Front and Rear; Drag-Other, Front, Rear, Front and Rear; Pull-Other, Left, Right, Left or Right; Lock-Up/Grab-Other, Front, Rear, Front and Rear, Not Listed; Pedal-Other, Appearance, Attachment, ABS Self Act., High Efforts, Soft/Spongy, Pulsates, Low Pedal, Noise, Not Listed; Inoperative/Ineffective-Other, Front, Rear, Front and Rear, Not Listed; Excessive Wear-Other, Front, Rear, Front and Rear; Leaks-Other Air Pressure-Vacuum, Fluid, Not Listed; Not Listed Service Brake-Other, Not Listed); 304\*\*\* chassis/Suspension/Other-Other; Ride Quality-Other, Harsh, Soft/Float, Bottoming, Not Listed; Lean/Sag/Height-Other, Both Ends Low, Both Ends High, Front Low, Front High, Leans Left, Leans Right; Dog Tracking-Other, Rear Tracks Left, Rear Tracks Right; Leaks-Other, Not Listed; Noise-Other, Front, Rear, Both, Not Listed; Indicator-Other, Not Listed; Shocks/Struts-Other, Leaks, Not Listed; Not Listed Suspension-Other, Not Listed); 403\*\*\* Engine/Exhaust System/Visual Smoke-Other, Blue, Black, White, Not Listed); 404\*\*\* Engine/Fuel System/Other-Other; Leaks-Other, Filter Area, Tank/Seams Area, Filler Neck, Gas Cap Area, Rail/Injector, Carburetor Area, Pump Seal Area, Lines, Tank Selector, Evaporative System, Not Listed; Odor-Other, Engine Compartment, Passenger Compartment, Trunk, Exterior, Not Listed; Noise-Other, Pump Assembly, Lines, Tank Area, Engine Compartment, Passenger Compartment, Trunk Area, Exterior, Not Listed; Slow Fill-Other, Not Listed; Attachment-Other, Not Listed, Filter, Tank, Filler, Neck/Cap, Fuel Rail/Regulator, Injector Carburetor, Pump Assembly, Lines; Routing-Other, Not Listed, Filter, Tank, Filler Neck/Cap; Fuel Rail/Regulator, Injector, Carburetor, Pump Assembly, Lines; Expulsion/Press-Other, When Refueling, When Running, When Turned Off, Not Listed; Indicator-Other, Low Fuel, Not Listed; Not Listed Fuel System-Other, Not Listed); 409\*\*\* Engine/Power Components/Other-Other; Block-Other, Not Listed; Head-Other, Not Listed; Crank-Other, Not Listed; Cam-Other, Not concern; Rod-Other, Not Listed; Piston-Other, Not Listed, Ring-Other, Not Listed; Oil Pump-Other, Not Listed; Power Components-Other, Not Listed); 499\*\*\* (Engine/General Concern/Other-Other; Appearance-Other,

Corrosion, Not Listed; Attach/Mounting-Other, Concern Not Listed; Misassembly-Other, Mounts/Dampers, Not Listed; Mechanical Failure-Other, Concern Not Listed; Other-Other, Not Listed); 704\*\*\* (Unknown Source/Fire/Smoke/Other-Other; Visible Flame-Other, Coll. Related, Trunk, Cargo/Bed Area, Passenger Area, Under hood, Under Vehicle, Not Listed; Smoke-Other, Coll. Related, Trunk, Cargo/Bed Area, Passenger Area, Under hood, Under Vehicle, Not Listed; Not Listed Fire/Smoke-Other, Listed); 705\*\*\* (Unknown Source/Odor/Other-Other, Under hood-Other, Not Listed; Trunk Area-Other, Not Listed; Passenger Compartment-Other, Not Listed, Under Vehicle-Other, Not Listed; Cargo/Bed Area-Other, Not Listed); and containing the computer search terms: smoke, fire, flame, burn, melt, thermal, and computerized variations of those words. Reports were reviewed for allegations concerning all under hood fires or other thermal anomalies, from any source or origin, of any description, level, degree, or magnitude, occurring in the left, or drivers side, of the engine compartment, including fires in the area of the left front wheel, or left front fender. To the extent that the above records reflect reports or allegations of under hood fires or thermal anomalies occurring in the left, or the driver side which may relate to the "specific components," two field reports are contained in Appendix IV-A for the 1992 and 1993 model year Crown Victoria and Grand Marquis and one field report is contained in Appendix V-A for the 1991, 1994-1995 model year Lincoln Town Car Vehicles.

Ford has also included field reports which describe under hood fires but are ambiguous as to the cause or origin of the fire or whether they may relate to the above-mentioned components. Three reports are contained in Appendix IV-B for the 1992 and 1993 model year Crown Victoria and Grand Marquis. No similar field reports were located for the 1991, 1994-1995 model year Lincoln Town Car Vehicles.

Unlike the owner complaints, no field reports which describe full vehicle fires but are ambiguous as to the alleged cause or origin of the fire or whether they may relate to the above-mentioned components were located for the 1992 and 1993 model year Crown Victoria and Grand Marquis or 1991, 1994-1995 model year Lincoln Town Car Vehicles.

Ford has also included field reports of other fires or "thermal anomalies", of any description, level, degree, or magnitude, occurring under hood in which it is alleged that the source of the fire was other than one of the "specific components." We have provided these reports in Appendix IV-D for the 1992 and 1993 model year Crown Victoria and Grand Marquis and in Appendix V-D for the 1991, 1994-1995 model year Lincoln Town Car Vehicles as "non-specific allegations" for your review because of the broad scope of the request. Based on our judgment, the information in these reports is insufficient to support a determination that they pertain to the alleged defect. We have not provided reports with specific allegations of smoke or burnt front brakes, brake rotors,

calipers, etc. that reside in the wheel well and not under hood.

As requested, a listing of the above identified reports has been prepared and is provided in Appendix XI.

Lawsuits and Claims. Ford's Office of the General Counsel ("OGC") is responsible for handling product liability lawsuits and claims and consumer breach of warranty lawsuits against the Company.

Ford understands this request to only seek a copy of the complaint for these lawsuits. Therefore Ford is providing, to the extent available, a copy of the complaint. Upon request, Ford also would be glad to produce to the agency Ford's answer to the complaint, Plaintiff's responses to Ford's and/or other parties' discovery requests, Ford's responses to Plaintiff's discovery requests, documents produced in discovery, Plaintiff's medical records, police/fire department/emergency medical service reports, vehicle recall history, vehicle warranty history, owner communications with Ford, photographs, and/or non-privileged vehicle inspections and expert reports.

Based on a reasonable and diligent search, Ford located ten lawsuits, 27 claims, and no consumer breach of warranty lawsuits potentially related to the alleged defect in the "specific components." To the extent that the above records reflect reports or allegations of under hood fires or "thermal anomalies" occurring in the left, or the driver side which may relate to the "specific components identified," no lawsuit complaints were located for the 1992 and 1993 model year Crown Victoria and Grand Marquis or for the 1991, 1994-1995 model year Lincoln Town Car Vehicles.

Ford has also included lawsuit complaints which describe under hood fires but are ambiguous as to the cause or origin of the fire or whether they may relate to the above-mentioned components. One lawsuit complaint is contained in Appendix VII-B for the 1992 and 1993 model year Crown Victoria and Grand Marquis and one lawsuit complaint is contained in Appendix VIII-B for the 1991, 1994-1995 model year Lincoln Town Car Vehicles.

Ford has also included lawsuit complaints which described full vehicle fires but are ambiguous as to the alleged cause or origin of the fire or whether they may relate to the above-mentioned components. No lawsuit complaints were located for the 1992 and 1993 model year Crown Victoria and Grand Marquis and two lawsuit complaints are contained in Appendix VIII-C for the 1991, 1994-1995 model year Lincoln Town Car Vehicles.

Ford has also included lawsuit complaints of other fires or "thermal anomalies", of any description, level,



degree, or magnitude, occurring under hood in which it is alleged that the source of the fire was other than one of the "specific components." We have provided these reports in Appendix VII-D for the 1992 and 1993 model year Crown Victoria and Grand Marquis and in Appendix VIII-D for the 1991, 1994-1995 model year Lincoln Town Car Vehicles as "non-specific allegations" for your review because of the broad scope of the request. Based on our judgment, the information in these Appendices VII-B, VIII-B, VII-C, VIII-C, VII-D, and VIII-D is insufficient to support a determination that they pertain to the alleged defect. We have not provided reports with specific allegations of smoke or burnt front brakes, brake rotors, calipers, etc. that reside in the wheel well and not under hood.

For each claim, Ford is providing, to the extent available, the claimant's medical records, police/fire department/emergency medical service reports, vehicle recall history, vehicle warranty repair history, owner communications with Ford, photographs, claim disposition notification, Ford requests for information to claimant, non-privileged vehicle inspections and expert reports, and the owner or his/her attorney's description of incident/claim and accompanying information.

To the extent that the above records reflect reports or allegations of under hood fires or "thermal anomalies" occurring in the left, or the driver side which may relate to the "specific components," four claims are contained in Appendix IX-A for the 1992 and 1993 model year Crown Victoria and Grand Marquis and no claims were located for the 1991, 1994-1995 model year Lincoln Town Car Vehicles.

Ford has also included claims which described under hood fires but are ambiguous as to the cause or origin of the fire or whether they may relate to the above-mentioned components. Six claims are contained in Appendix IX-B for the 1992 and 1993 model year Crown Victoria and Grand Marquis and four claims are contained in Appendix X-B for the 1991, 1994-1995 model year Lincoln Town Car Vehicles.

Ford has also included claims which describe full vehicle fires but are ambiguous as to the alleged cause or origin of the fire or whether they may relate to the above-mentioned components. Four claims are contained in Appendix IX-C for the 1992 and 1993 model year Crown Victoria and Grand Marquis and one claim is contained in Appendix X-C for the 1991, 1994-1995 model year Lincoln Town Car Vehicles.

Ford has also included claims of other fires or "thermal anomalies," of any description, level, degree, or magnitude, occurring under hood in which it is alleged that the source of the fire was other than one of the "specific components." We have provided these reports in Appendix IX-D for the 1992 and 1993 model year Crown Victoria and Grand Marquis and in Appendix X-D for the 1991, 1994-1995 model year

Lincoln Town Car Vehicles as "non-specific allegations" for your review because of the broad scope of the request. Based on our judgment, the information in Appendices IX-B, X-B, IX-C, X-C, IX-D, and X-D is insufficient to support a determination that they pertain to the alleged defect. We have not provided claims with specific allegations of smoke or burnt front brakes, brake rotors, calipers, etc. that reside in the wheel well and not under hood.

A listing of the identified lawsuits and claims has been provided in Appendix XI.

Responsive documents that are privileged or attorney work product are reflected on the Privilege Log contained in Appendix XI.

We note that the Agency's definition of Ford includes Ford's outside law firms. However, to the extent that Ford retained law firms in connection with the claims and lawsuits identified above, any files maintained by Ford's law firms ordinarily would contain voluminous duplicative documentation and take months to gather and process. Nevertheless, in the interest of ensuring the thoroughness of our production, we have contacted the law firms which handled the claims identified and asked them to provide, to the extent available, copies of documents produced in discovery and non-privileged reports of vehicle inspections and experts. These documents, to the extent that any exists, will be provided under separate cover in the near future. Ford understands this request to only seek a copy of the complaint for the lawsuits identified above, so Ford has not included similar information from its law firms' files related to those lawsuits.

A search of Ford's litigation prevention files located a single file relating to a specific owner report and has been provided in Appendix II-A.



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Schedule Number:	27.03

L. W. Camp  
Director  
Automotive Safety Office  
Environmental And Safety Engineering

Ford Motor Company  
330 Town Center Drive  
Dearborn, Michigan 48126

February 9, 1999

Mr. Thomas Z. Cooper, Chief  
Vehicle Integrity Division  
Office of Defects Investigations  
National Highway Traffic  
Safety Administration  
400 Seventh Street, S. W.  
Washington, DC 20590

Dear Mr. Cooper:

Subject: PE98-055:NSA12jfa

This letter supplements Ford's January 22, 1999 response concerning the subject agency investigation.

Request No. 2

State the number incidents, known to Ford, in which the alleged defect has been reported to have occurred in the subject vehicles. Furnish copies of all documents, from any and all sources, including documents which may not originally have been submitted to Ford, which are in Ford's possession or control, or of which it is otherwise aware, that pertain, in any way, to any of these incidents. This should include, but is not limited to, all documents possessed by Ford, or of which it is otherwise aware, pertaining to the reports included with this letter. Furnish all documents whether or not Ford has verified the validity of each document. For each incident in this response please provide the vehicle owner's name, address, and telephone number; and identify all vehicles by vehicle identification number, model year, date of manufacture, date of, retail sale, date of incident, mileage at the time of the incident, and problem description. For all incidents involving lawsuits please identify the caption, court, docket number, and filing date of each lawsuit and a copy of the complaint document initiating the lawsuit. Sort all incidents by cause and area or component of origin.

3713 0030

February 5, 1999

Answer

We have now completed the review of certain files, as indicated in my January 22, 1999 letter, to determine the relationship between these certain files provided in Appendix X and other owner reports, field reports etc. provided in Appendices I, III, VI, VII, and VIII. Copies of these litigation prevention files with the associated documents are being provided in Appendix I-A, I-B, and VI-A through VI-C. Two of the VIN's identified in the litigation prevention files did not have associated documents in Appendices I, III, VI, VII, and VIII. These two VIN's provided to the agency January 22, 1999 in Appendix X represent two additional incidents and have been identified in Appendix X-A.

Request No. 6

Identify and describe all inspections, tests or other analyses, conducted by Ford, its contractors suppliers, or by any other entities, regarding the inspection of any subject vehicles that relate to the alleged defect, to date. Identify, by name and address, the entity that conducted each such test or analysis. Furnish copies of all reports, surveys, notes, tables, graphs or other documents that pertain to each such test or analysis. State when each test or analysis was initiated and concluded, or whether it is still in progress. Include in your response a description of a worst case scenario.

Answer

Subsequent to our January 22, letter, on January 27, Ford reviewed 1991, 1992, 1993, and 1994 model year Lincoln Town car vehicles to identify and compare components in the left side under hood location. Photographs have been provided of this evaluation in Appendix XIII-A as potentially responsive to this request.

Request No. 8

Identify and describe all significant modifications or changes made by or on behalf of Ford in the manufacture, design, or material composition of all components in the subject vehicles that may relate to the alleged defect. The following information must be included for each such modification or change:

- a. the 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; and
- d. whether the modified or changed components can be interchanged with earlier production components;

Mr. Thomas Z. Cooper  
PE98-055

- 3 -

February 5, 1999

A summary of the significant design, manufacturing, design/material changes which may be related to your inquiry is provided in Appendix KV-A. This information supplements the previously provided drawing and design change information.

As the Agency is aware, Ford investigations of under hood fires on these Lincoln Town Cars is continuing.

If you have any questions concerning this response please contact me.

Very truly yours,

  
L. W. Camp

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Attachment

coveruppPE98-055.doc  
w/mattje

3713 0032



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L. W. Camp  
Director  
Automotive Safety Office  
Environmental And Safety Engineering

Ford Motor Company  
300 Town Center Drive  
Dearborn, Michigan 48126

January 26, 1999

Mr. Frank Seales, Jr., Esq.  
Chief Counsel  
National Highway Traffic  
Safety Administration  
400 Seventh Street, S. W.  
Washington, DC 20590

Dear Mr. Seales:

Subject: Request Under 49 C.F.R. Part 512 for  
Confidential Treatment of Information

Enclosed are two copies of documents contained in  
Appendix XV Ford's January 22 response to NHTSA's inquiry PE98-  
055:NSA-12jfa dated November 24, 1998.

Appendix XV contains documents of commercial  
proprietary information regarding design changes and tooling  
costs. This letter provides support for Ford's claim of  
confidentiality in accordance with 49 C.F.R. Part 512.4(b) for  
these documents.

Ford Motor Company requests confidential treatment  
for these documents in Appendix XV which contain privileged and  
confidential commercial information and financial information  
exempt from disclosure pursuant to 49 C.F.R. § 512.4-6, 5  
U.S.C. § 552(b) (4), and 15 U.S.C. § 1418.

Documents of the type included in Appendix XV are  
maintained under record keeping systems which intend to control  
dissemination of these materials within Ford Motor Company, and  
to assure that the materials are not disseminated outside of  
Ford Motor Company, except as described in the attached  
certification, which is made pursuant to 49 CFR Part 512.4(a).

Cognizant Ford personnel indicate that, to the best  
of their knowledge, neither NHTSA nor other Federal agencies  
nor Federal courts have made determinations relating to the  
confidentiality of the submitted information. However, similar  
discussion papers and financial information concerning other  
topics have previously been provided confidential treatment by  
NHTSA.

3713 0033

January 26, 1999

Ford requests that these documents be afforded confidential treatment by the agency for a period of ten years. Earlier disclosure of these documents, in Ford's opinion, would result in substantial competitive harm.

Further, Ford respectfully submits that provisions of the National Traffic and Motor Vehicle Safety Act, as amended, in particular Section 112(e), limit the exercise of NHTSA's discretion that otherwise might be available under FOIA exemption 4. Section 112(e) is a non-disclosure statute under FOIA exemptions 3, and it operates separately from, and in addition to, FOIA exemption 4. Consequently, for the Administration to disclose the documents in question would, we contend, be a denial of the rights to protection conferred by the Safety Act of Ford, as the submitter of this document, in violation of Section 112(e), as well as Section 1905 of Title 18 of the United States Code.

In the event that the Administration should conclude that all or part of the submitted information is not to be given confidential treatment, Ford asks the Administrator to provide reasonable notice of not less than ten working days prior to any contemplated disclosure in order that Ford may pursue such legal remedies as it may choose. Please direct all notices to Mr. Jay D. Logel, Ford Motor Company, Suite 300, Parklane Towers West, Three Parklane Blvd., Dearborn, MI 48126, telephone (313) 594-3723. Thank you for your continuing courtesy.

Very truly yours,



L. W. Camp

Attachment

whvntspets-002.doc  
wnc/tp

3713 0034

CERTIFICATE IN SUPPORT OF REQUEST  
FOR CONFIDENTIALITY

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Schedule Number:	27.03

I, W. J. Bohan, pursuant to the provisions of 49 C.F.R. PART 512, state as follows:

1. I am Manager, Production Vehicle Safety and Compliance Activity, Automotive Safety Office, and I am authorized by Ford Motor Company to execute documents of this nature on behalf of Ford Motor Company;
2. The information contained in the attachment to Ford's letter to NHTSA's Office of the Chief Counsel dated January 26, 1999 is confidential and proprietary data and is submitted with the claim that it is entitled to confidential treatment under 5 U.S.C., § 552(b)(4);
3. A member of my staff has personally inquired of the responsible Ford Motor Company personnel who have authority in the normal course of business to release the information for which a claim of confidentiality has been made to ascertain whether such information has ever been released outside Ford Motor Company;
4. Based upon such inquiries, to the best of my knowledge, information and belief, the information for which Ford Motor Company has claimed confidential treatment has never been released or become available outside Ford Motor Company except as submitted herewith to the NHTSA Chief Counsel; During the course of defending itself in litigation, Ford may have been, or may be required to produce some or all of the information for which confidential treatment has been requested. Ford's practice is to always attempt to produce such information in litigation only under the protection of a confidentiality order. Because the production of such information is likely to be limited to the parties in the litigation, it should not compromise the confidential nature of the information.
5. I make no representations beyond those contained in this certificate and, in particular, I make no representations as to whether this information may become available outside Ford Motor Company because of unauthorized or inadvertent disclosure, except as stated in Paragraph 4; and
6. I certify under penalty of perjury that the foregoing is true and correct. Executed on this the 26<sup>th</sup> day of January.

  
W. J. Bohan





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Schedule Number:	27.03

L. W. Camp  
Director  
Automotive Safety Office  
Environmental And Safety Engineering

Ford Motor Company  
300 Town Center Drive  
Dearborn, Michigan 48126

January 22, 1999

Mr. Thomas Z. Cooper, Chief  
Vehicle Integrity Division  
Office of Defects Investigations  
National Highway Traffic  
Safety Administration  
400 Seventh Street, S. W.  
Washington, DC 20590

Dear Mr. Cooper:

Subject: PE98-055:NSA12jfa

Attached is Ford's response to your letter dated November 24, 1998 concerning 1992 and 1993 model year Lincoln Town Car under hood fires. We expect to submit additional information responsive to this inquiry on February 2, and on February 15, 1999.

As the Agency is aware, Ford investigations of under hood fires on these Lincoln Town Cars is continuing.

If you have any questions concerning this response please contact me.

Very truly yours,

Attachment

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wma:ljg

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ATTACHMENT  
January 22, 1999FORD'S RESPONSE TO PE98-055

Ford's response to this Preliminary Evaluation inquiry was prepared pursuant to a diligent and good faith search for the information requested. While we have employed our best good faith efforts to provide responsive information, the breadth of the Agency's request and the requirement that information be provided on an expedited basis makes this a difficult task. We nevertheless have made every effort to provide thorough and accurate information and we would be pleased to meet with Agency personnel to discuss any aspect of this inquiry.

The scope of Ford's investigation conducted to locate responsive information focused on Ford employees most likely to be knowledgeable about the subject matter of this inquiry, and to reviewing Ford files in which responsive information ordinarily would be expected to be found and to which Ford ordinarily would refer, as more fully described in this response. To the extent that the Agency's definition of Ford includes suppliers, contractors and affiliated enterprises for which Ford does not exercise day-to-day operational control, we note that information belonging to such entities ordinarily is not in Ford's possession, custody or control. Ford has construed this request as pertaining to vehicles manufactured for sale in the United States.

Responses to your specific numbered requests follow. As requested, after each numeric designation, we have set forth verbatim the request for information, followed by our response to it.

Request No. 1

State the total number of subject vehicles sold in the United States by model year.

Answer

Ford records indicate that approximately 109,000 1992 model year Lincoln Town Cars and 113,500 1993 model year Lincoln Town Cars were produced for sale in the United States.

Request No. 2

State the number incidents, known to Ford, in which the alleged defect has been reported to have occurred in the subject vehicles. Furnish copies of all documents, from any and all sources, including documents which may not originally have been submitted to Ford, which are in Ford's possession or control, or of which it is otherwise aware, that pertain, in any way, to any of these incidents. This should include, but is not limited to, all documents possessed by Ford, or of which it is otherwise aware, pertaining to the reports included with this letter. Furnish all documents whether or not Ford has verified the validity of each

document. For each incident in this response please provide the vehicle owner's name, address, and telephone number; and identify all vehicles by vehicle identification number, model year, date of manufacture, date of retail sale, date of incident, mileage at the time of the incident, and problem description. For all incidents involving lawsuits please identify the caption, court, docket number, and filing date of each lawsuit and a copy of the complaint document initiating the lawsuit. Sort all incidents by cause and area or component of origin.

#### ANNEX

For purposes of identifying reports of incidents potentially involving the alleged defect and any related documents, Ford has gathered "owner reports" and "field reports" maintained by Ford Customer Service Division ("FCSD"), and claim and lawsuit information maintained by Ford's Office of the General Counsel ("OGC").

Owner Reports. As the agency is aware, within FCSD's North American Customer Service Operations, there is a Customer Assistance Center ("CAC") that is responsible for facilitating communication between customers, dealerships and Ford Motor Company. Among other things, the CAC handles telephonic, electronic (via the Internet), and written inquiries, suggestions, informational requests, and concerns ("contacts") from Ford and Lincoln-Mercury vehicle owners about their vehicles or sales and service processes. The contacts are handled by CAC customer service representatives, who enter a summary of the customer contact into a database known as MORS (Master Owner Relations System). Certain contacts, such as letters from customers, are entered into the MORS database and also are copied to microfilm, or more recently, imaged and stored electronically.

The CAC assigns to each vehicle-related contact report a "symptom code" or category that generally reflects the nature of the customer contact or vehicle concern, as described by the owner. The CAC does not undertake to confirm the accuracy of the description provided by the owner; they simply record what is reported. Therefore, given the complexity of the modern motor vehicle, it is Ford's experience that a significant percentage of owner contacts do not contain sufficient information to make a technical assessment of the condition of the vehicle or the cause of the event reported. Accordingly, although MORS contact reports may be useful in identifying potential problems and trends, the records are not the empirical equivalent of confirmed incidents and/or dealership's diagnosis. The MORS database maintains customer contact information for five years.

January 22, 1993

In responding to this information request, Ford electronically searched MORS contact reports dated through December 4, 1992 for 1992 and 1993 model year Lincoln Town Car vehicles with symptom codes 203\*\*\* (Electrical/Charging System-Low Charge, High Charge, Inoperative, Noise, Indicator, Wiring/Basic- Attachment, Routing, Trailer, Starting System-Drive Engage, Slow Crank, Ignition Switch, Inoperative, Noise, Battery-Low Fluid, Broken Terminal, Case Cracked, Leaks, Won't Hold Charge, Auxiliary (Dual), Circuit Protection-Fuse Box Internal, Distribution Box (External)); 301\*\*\* (Chassis/Service Brake System-ABS Indicator, Noisy-Front, Rear, Front and Rear, Drag-Front, Rear, Front and Rear, Pull-Left, Right, Left or Right, Lock-Up/Grab-Front, Rear, Front and Rear, Pedal-Appearance, Attachment, ABS Self Actuating, High Efforts, Soft/Spongy, Pulsates, Low Pedal, Noise, Inoperative/Ineffective-Front, Rear, Front and Rear, Excessive Wear-Front, Rear, Front and Rear, Leaks-Air Pressure, Fluid); 304\*\*\* (Chassis/Suspension System/Suspension Ride Quality-Harsh, Soft/Float, Bottoming, Lean/Sag/Height-Both Ends Low, Both Ends High, Front Low, Front High, Leans Left, Leans Right, Suspension Dog Tracking, Suspension Leaks, Suspension Noise-Front, Rear, Both, Suspension Indicator, Suspension Shocks/Struts- Leaks); 4034\*\* (Exhaust System Visual Smoke-Blue, Black, White); 404\*\*\* (Exhaust System/Fuel System/ Leaks-Filter Area, Tank/Seams area, Filler Neck, Gas Cap Area, Pump/Seal Area, Lines, Tank Selector, Fuel System Odor-Engine Compartment, Passenger Compartment, Trunk, Exterior, Fuel System Noise-Pump Assembly, Tank Area, Engine Compartment, Passenger Compartment, Trunk Area, Exterior, Fuel System Slow Fill, Fuel System Attachment- Filter, Tank, Filler Neck/Cap, Injector, Fuel System Routing-Filter, Tank, Filler Neck/Cap, Injector, Fuel System Expulsion/Press-When Refueling, When Running, When Turned Off, Fuel System Indicator-Low Fuel); 499\*\*\* (Engine Noise/Basic Engine/Engine General Concern, Appearance, Appearance Corrosion, Attach/Mounting, Missing Comps., Misassembly, Mechanical Failure, Indicator Check Engine); 704\*\*\* (Unknown Source/Fire Smoke/Visible Flame-Coll. Related, Trunk, Cargo/Bed Area, Passenger Area, Underhood, Under Vehicle, Fire/Smoke/Smoke-Coll. Related, Trunk, Cargo/Bed Area, Passenger Area, Underhood, Under Vehicle, Fire/Smoke Scorched/Burnt-Coll. Related, Trunk, Cargo/Bed Area, Passenger Area, Underhood, Under Vehicle); 705\*\*\* (Unknown Source/Odor/ Underhood, Trunk Area, Passenger Compartment, Under Vehicle, Cargo/Bed Area). The electronic search was performed with Concordance full-text information retrieval software, using the following search terms: smoke\*, fire, flam\*, burn\*, melt\*, thermal, underhood, smolder\*, hot, overheat\*, smell\*, odor\* and computer generated variations of those words. Contact reports obtained from the electronic search were reviewed for allegations concerning all under hood fires or other thermal anomalies, from any source or origin, of any description, level, degree, or magnitude, occurring in the left, or drivers side, of the engine compartment, including fires in the area of the left front wheel, or left front fender. To the extent that the above records reflect reports or allegations of under hood fires or other thermal anomalies,

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from any source or origin, of any description, level, degree, or magnitude, occurring in the left, or drivers side, of the engine compartment, including fires in the area of the left front wheel, or left front fender. 54 reports are contained in Appendix I.

Ford has also included owner reports which are ambiguous as to whether they meet the alleged defect criteria. Most of these ambiguous reports describe smoke, melted wiring harnesses or fires which do not identify a location. We have provided these reports in Appendix II as "non-specific allegations" for your review because of the broad scope of the request. Based on our engineering judgment, the information in these reports is insufficient to support a determination that they pertain to the alleged defect.

In the interest of responding promptly to this inquiry, Ford has not undertaken to gather the microfilm or electronic images related to these contacts because of the largely duplicative nature of the information contained in the microfilm and images, as well as the time and the burden associated with locating and producing those documents. The pertinent information related to these contacts generally would be included in the contact reports obtained from the MORS system. To the extent that those documents exist, they are reflected in the "Micro Nbr:" field of the MORS contact reports. Upon request, Ford will attempt to locate any specific items that are of interest to the agency.

Field Reports. Within FCSD, there is a Vehicle Service & Programs Office that has overall responsibility for vehicle service and technical support activities, including the administration of field actions. That Office is the primary source within Ford of vehicle concern information originating from Ford and Lincoln-Mercury dealerships, field personnel, and other sources. The information is maintained in a database known as the Common Quality Indicator System ("CQIS"). The CQIS database includes reports compiled from more than 40 Company sources (e.g., Company-owned vehicle surveys, service technicians, field service and quality engineers, and technical hot line reports, etc.) providing what is intended to be a comprehensive concern identification resource. As with MORS contact reports, CQIS reports are assigned a "symptom code" or category that generally reflects the nature of the concern. The CQIS database maintains information for five years.

In responding to this information request, Ford electronically searched CQIS reports dated through December 8, 1998 for 1992 and 1993 model year Lincoln Town Car vehicles with the following symptom codes: Electrical/Start/Charge/Charging System-Other, Low Charge, High Charge, Inoperative, Noise, Indicator, Not Listed; Wiring-Basic-Other, Attachment, Routing, Insul/Shielding, Trailer, Not Listed; Starting System-Other, Drive Engage, Slow Crank, Ignition Switch, Air Systems, Inoperative, Noise, Not Listed; Battery-Other, Low Fluid, Broken Terminal, Case Cracked, Leaks, Won't Hold Charge,

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Auxiliary (Dual), Not Listed; Circuit Protection-Other, Fuse Box (Interior), Distribution Box (Exterior), In-Line Fuse, In-Line Breaker, Fuse Link, Diode, Relay, Resistor, Not Listed); 301\*\*\* (Chassis/Service Brake/Indicator-Other, Red Only, Amber Only, Red/Amber Only, Not Listed; Other-Other; Noisy-Other, Front, Rear, Front and Rear; Drag-Other, Front, Rear, Front and Rear; Pull-Other, Left, Right, Left or Right; Lock-Up/Grab-Other, Front, Rear, Front and Rear, Not Listed; Pedal-Other, Appearance, Attachment, ABS Self Act., High Efforts, Soft/Spongy, Pulsates, Low Pedal, Noise, Not Listed; Inoperative/Ineffective-Other, Front, Rear, Front and Rear, Not Listed; Excessive Wear-Other, Front, Rear, Front and Rear; Leaks-Other Air Pressure-Vacuum, Fluid, Not Listed; Not Listed Service Brake-Other, Not Listed); 304\*\*\* chassis/Suspension/Other-Other; Ride Quality-Other, Harsh, Soft/Float, Bottoming, Not Listed; Lean/Sag/Height-Other, Both Ends Low, Both Ends High, Front Low, Front High, Leans Left, Leans Right; Dog Tracking-Other, Rear Tracks Left, Rear Tracks Right; Leaks-Other, Not Listed; Noise-Other, Front, Rear, Both, Not Listed; Indicator-Other, Not Listed; Shocks/Struts-Other, Leaks, Not Listed; Not Listed Suspension-Other, Not Listed); 4034\*\* Engine/Exhaust System/Visual Smoke-Other, Blue, Black, White, Not Listed); 404\*\*\* Engine/Fuel System/Other-Other; Leaks-Other, Filter Area, Tank/Spans Area, Filler Neck, Gas Cap Area, Rail/Injector, Carburetor Area, Pump Seal Area, Lines, Tank Selector, Evaporative System, Not Listed; Odor-Other, Engine Compartment, Passenger Compartment, Trunk, Exterior, Not Listed; Noise-Other, Pump Assembly, Lines, Tank Area, Engine Compartment, Passenger Compartment, Trunk Area, Exterior, Not Listed; Slow Fill-Other, Not Listed; Attachment-Other, Not Listed, Filter, Tank, Filler, Neck/Cap, Fuel Rail/Regulator, Injector Carburetor, Pump Assembly, Lines; Routing-Other, Not Listed, Filter, Tank, Filler Neck/Cap; Fuel Rail/Regulator, Injector, Carburetor, Pump Assembly, Lines; Expulsion/Press-Other, When Refueling, When Running, When Turned Off, Not Listed; Indicator-Other, Low Fuel, Not Listed; Not Listed Fuel System-Other, Not Listed); 409\*\*\* Engine/Power Components/Other-Other; Block-Other, Not Listed; Head-Other, Not Listed; Crank-Other, Not Listed; Cam-Other, Not concern; Rod-Other, Not Listed; Piston-Other, Not Listed, Ring-Other, Not Listed; Oil Pump-Other, Not Listed; Power Components-Other, Not Listed); 499\*\*\* (Engine/General Concern/Other-Other; Appearance-Other, Corrosion, Not Listed; Attach/Mounting-Other, Concern Not Listed; Misassembly-Other, Mounts/Dampers, Not Listed; Mechanical Failure-Other, Concern Not Listed; Other-Other, Not Listed); 704\*\*\* (Unknown Source/Fire/Smoke/Other-Other; Visible Flame-Other, Coll. Related, Trunk, Cargo/Bed Area, Passenger Area, Underhood, Under Vehicle, Not Listed; Smoke-Other, Coll. Related, Trunk, Cargo/Bed Area, Passenger Area, Underhood, Under Vehicle, Not Listed; Not Listed Fire/Smoke-Other, Listed); 705\*\*\* (Unknown Source/Odor/Other-Other, Underhood-Other, Not Listed; Trunk Area-Other, Not Listed; Passenger Compartment-Other, Not Listed, Under Vehicle-Other, Not Listed; Cargo/Bed Area-Other, Not Listed); and containing the computer search terms: smoke, fire, flame, burn, melt, thermal, and computerized variations of those words. Reports

January 22, 1993

were reviewed for allegations concerning all under hood fires or other thermal anomalies, from any source or origin, of any description, level, degree, or magnitude, occurring in the left, or drivers side, of the engine compartment, including fires in the area of the left front wheel, or left front fender. To the extent that the above records reflect reports or allegations of under hood fires or other thermal anomalies, from any source or origin, of any description, level, degree, or magnitude, occurring in the left, or drivers side, of the engine compartment, including fires in the area of the left front wheel, or left front fender, nine reports are contained in Appendix III representing seven incidents in addition to those in owner complaints, lawsuits and claims, and VOQ's and other agency contacts.

Ford has also included in Appendix IV field reports which are ambiguous as to whether they fully meet the alleged defect criteria. We have included these reports as "non-specific allegations" for your review because of the broad scope of the request. Based on our engineering judgment, the information in these reports is insufficient to support a determination that they pertain to the alleged defect.

As requested, a listing of the above identified reports has been prepared and is provided in Appendix V. This listing also contains all NHTSA VOQ's (or other contacts) provided to Ford from the agency to date.

Ford has also included in Appendix VI owner and field reports specific to VOQ's provided by the Agency.

Lawsuits and Claims. Ford's Office of the General Counsel ("OGC") is responsible for handling product liability lawsuits and claims and consumer breach of warranty lawsuits against the Company.

Based on a reasonable and diligent search, Ford located five lawsuits, 31 claims, and no consumer breach of warranty lawsuits potentially related to the alleged defect in the subject vehicles. Ford understands this request to only seek a copy of the complaint for these lawsuits. Therefore Ford is providing, to the extent available, a copy of the complaint in Appendix VII. Upon request, Ford also would be glad to produce to the agency Ford's answer to the complaint, Plaintiff's responses to Ford's and/or other parties' discovery requests, Ford's responses to Plaintiff's discovery requests, documents produced in discovery, Plaintiff's medical records, police/fire department/emergency medical service reports, vehicle recall history, vehicle warranty history, owner communications with Ford, photographs, and/or non-privileged vehicle inspections and expert reports.

January 22, 1999

For each claim, Ford is providing, to the extent available, the claimant's medical records, police/fire department/emergency medical service reports, vehicle recall history, vehicle warranty repair history, owner communications with Ford, photographs, claim disposition notification, Ford requests for information to claimant, non-privileged vehicle inspections and expert reports, and the owner or his/her attorney's description of incident/claim and accompanying information in Appendix VIII. Also enclosed are two video tapes showing the under hood of a Lincoln Town Car. The video tapes identify the involved vehicle.

A listing of the identified lawsuits and claims has been provided in Appendix IX.

Responsive documents that are privileged or attorney work product are reflected on the Privilege Log contained in Appendix IX.

We note that the Agency's definition of Ford includes Ford's outside law firms. However, to the extent that Ford retained law firms in connection with the claims and lawsuits identified above, any files maintained by Ford's law firms ordinarily would contain voluminous duplicative documentation and take months to gather and process. Nevertheless, in the interest of ensuring the thoroughness of our production, we have contacted the law firms which handled the claims identified and asked them to provide, to the extent available, copies of documents produced in discovery and non-privileged reports of vehicle inspections and experts. These documents, to the extent that any exists, will be provided under separate cover in the near future. Ford understands this request to only seek a copy of the complaint for the lawsuits identified above, so Ford has not included similar information from its law firms' files related to those lawsuits.

A search of Ford's litigation prevention files located additional documents relating to specific owner and field reports, VOQ's, and lawsuits and claims provided in Appendices I-VI. These documents are provided with their respective owner, field VOQ, etc., reports. Additionally, one litigation prevention file contained documents relating to multiple incidents. This complete file is provided in Appendix X. Ford is currently matching these documents to their associated specific owner and field reports, VOQ's, lawsuits, and claims. We have not verified at the time of this submission if all incidents located in this file are relevant to your request or if they have been previously identified in the documents contained in Appendices I-VI.

Request No. 3

State the total number vehicles sold in the United States by model name and model year that have engine compartment (sic) configurations (i.e., components and component location, wiring harnesses and harness

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January 22, 1999

location) the same as the subject vehicles. Provide a response to question number two for all vehicles identified in your answer to this question.

Answer

In accordance with the agency's January 11, 1999 letter and a January 21, 1999 telephone discussion between Ford Automotive Safety personnel and Messrs. Cooper and Abbott of NHTSA, it is planned to provide information pertinent to this request by February 15, 1999.

Request No. 4

State the number of all warranty claims, including extended warranty claims, and "goodwill," field or zone adjustments received by Ford that relate to the alleged defect in the subject vehicles by calendar year, calendar month, and problem identification. Identify all owners by name, address, and telephone number, and all vehicles by vehicle identification number, model name, model year, date of manufacture, date of retail sale, date of incident, mileage at the time of the incident, and problem description.

Answer

Ford's Analytical Warranty System was searched for all claims meeting the following criteria: 1992 and 1993 model year Lincoln Town Cars; Cost category - All vehicle coverages/contractual; Region sold - North America; Country sold/ repaired - USA/USA; Vehicle line WERS - Lincoln Town Car (FMS), condition codes - 46 = burned out, 85 = melted, H3 = melted wire harness or connector, and H5 = other unknown - describe type. The customer and technician comments in the identified claims were then reviewed for "all under hood fires, or other thermal anomalies, from any source or origin, of any description, level, degree, or magnitude, ..." using the key words \*fire\*, \*burn\*, \*melt\*, \*flame\*, \*smoke\*, \*blaze\*, \*ignite\*, not\*misfire\*, not\*backfire\*, and not\*light bulb burnt out\*. Three hundred twenty four claims that may relate to the alleged defect were located in these searches. A summary of these claims as requested by calendar year, calendar month, and problem identification is contained in Appendix XI. Owner name, address, and telephone number are not available in the AWS database that is used as the source of warranty information and is not readily available to Ford. Accordingly we are unable to provide this information. Should the Agency require this information for specific vehicles, Ford will attempt to locate it upon request. The summary of the warranty data provided contains information for all vehicles by vehicle identification number, model name, model year, date of manufacture, date of retail sale, date of incident, mileage at the time of the incident, and problem description in Appendix XI.

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January 22, 1999

Ford is continuing its review of warranty information to determine if additional components or condition codes contain warranty information that may relate to this investigation.

Request No. 5

Identify all electrical circuits by name, number, and wire color, located in the left side of the engine compartment that are, or remain, energized by the battery when the ignition key is in the off position. For all circuits identified, provide a schematic drawing which identifies the harness(es) in which they reside, the harness location(s), and the components to which power is supplied.

Answer

Ford has provided a listing of the circuits that remain energized at all times on the left hand side of the engine compartment for the subject vehicles in Appendix XII. The Appendix includes circuit diagrams showing the energized circuits and a diagram showing the components and the wire routing to these components. Additionally, Appendix XII contains electrical distribution system service information for the entire vehicle for the 1992 and 1993 model year Town Car. The Appendix also contains information pertaining to Crown Victoria and Grand Marquis vehicles which utilize essentially the same electrical distribution system.

Request No. 6

Identify and describe all inspections, tests or other analyses, conducted by Ford, its contractors suppliers, or by any other entities, regarding the inspection of any subject vehicles that relate to the alleged defect, to date. Identify, by name and address, the entity that conducted each such test or analysis. Furnish copies of all reports, surveys, notes, tables, graphs or other documents that pertain to each such test or analysis. State when each test or analysis was initiated and concluded, or whether it is still in progress. Include in your response a description of a worst case scenario.

Answer

Ford is construing this request broadly and providing not only non-privileged reports, surveys, and investigations related to the alleged defect in the subject vehicles, but also non-privileged notes, correspondence, and other communications that were located pursuant to a diligent search for the requested information. The Ford business units and/or affiliates from which responsive documents were located are as follows: Advanced Vehicle Technology-Chassis Electrical & Engineering Systems Applications/-Design Analysis/-Materials.

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January 22, 1999

Fasteners & Core; Ford Customer Service Division-Consumer Affairs/-Quicker Service Fix Support; Large/Luxury Car Vehicle Center-Ongoing Product Development Chassis Engineering; Office of the General Counsel-Consumer Litigation/-Product Litigation; FCSD Litigation Prevention. Ford is providing the responsive documentation in Appendices I, III, VI, VII and VIII.

Ford is also providing in Appendix XIII photographs of vehicles inspected in Texas on January 13 and 14, 1999 and information relating to an ongoing investigation of a field report from Memphis, Tennessee.

Request No. 7

If Ford has issued any bulletins, advisories, or other communications to distributors, retailers, consumers, or any other entity 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.

Answer

No Technical Service Bulletins (TSB's) advisories or other communications related to the alleged defect were located in searches of FCSD files.

One Special Service Message which concerns a fuse in the rear air-suspension system was located and is provided for your information in Appendix XIV. We assume this request does not seek information related to electronic communications between Ford and its dealers regarding the order, delivery, or payment for replacement parts, so we do not include this information in our answer.

Request No. 8

Identify and describe all significant modifications or changes made by or on behalf of Ford in the manufacture, design, or material composition of all components in the subject vehicles that may relate to the alleged defect. The following information must be included for each such modification or change:

- a. the 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; and
- d. whether the modified or changed components can be interchanged with earlier production components.

January 22, 1999

**Answer**

Ford respectfully objects to this request as being unduly broad and ambiguous as to all modifications or design changes made by or in the behalf of Ford in the manufacture, design, or material composition in the subject vehicles that may relate to the alleged defect. The left front under hood portion of the subject vehicles contains numerous systems and subsystems of the vehicle which govern virtually all aspects of the vehicle function including steering, braking, suspension, engine management, cruise control, etc. Identifying all the changes to these components and determining with certainty which, if any, may be related to the subject of your inquiry, when the causes of the reported fires have not been determined, is a daunting task, particularly in the time allotted by your inquiry. Nonetheless, in the interest of responding promptly to this inquiry, Ford has gathered information relating to design changes to the major components and wiring located in the left under hood area of the subject vehicles. We are currently reviewing this information to determine if any of the changes may be relevant to your inquiry. To the extent that any of the changes are determined to be relevant, we will provide the requested information for those changes by February 2, 1999. Although not requested, documentation related to these changes is provided in Appendix XV for your information. Certain materials to be included in Appendix XV are considered confidential and are being submitted separately to the Office of the Chief Counsel pursuant to 49 CFR Part 517.

**Request No. 2**

Provide Ford's assessment of the alleged defect in the subject vehicles, including:

- a. all causal or contributory factors;
- b. the failure mode;
- c. the risk to occupant safety it poses; and
- d. whether there are any circumstances that would provide the vehicle owner or others with warning of its existence.

**Answer**

At this time, Ford does not have sufficient data to determine the causes of the reported fires or whether there is any pattern of a defect. As the agency is aware we have a diligent investigation in progress in an effort to determine if a defect exists.

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January 22, 1999

As a part of this investigation, Ford is analyzing the information provided in this response and gathering additional information in the form of surveys and vehicle inspections on specific components, wiring and connectors located in the under hood area described previously. The investigations, which include the vehicles reviewed by the agency and Ford on January 13 and 14 of this year, are ongoing and Ford will provide the agency with updates as soon as the information can be collected and analyzed.

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U.S. Department  
of Transportation  
National Highway  
Traffic Safety  
Administration

400 Seventh Street, N.W.  
Washington, D.C. 20304

JAN 11 1989

**CERTIFIED MAIL  
RETURN RECEIPT REQUESTED**

W. J. Schae, Manager  
Automotive Safety Office  
Ford Motor Company, Room 500  
130 Town Center Drive  
Dearborn, MI 48124

NHA-1214  
FEPD-025

Dear Mr. Schae:

As you know, Ford's response to the Office of Defect Investigation's (ODI) Information Request (IR) letter dated November 24, 1988, is due January 15, 1989. Question 3 of the IR requests Ford to identify other vehicles that "have engine compartment (s) (s) configurations (i.e., components and component location, wiring harnesses and harness location) the same as the subject vehicle" and respond to Question 2 (providing incident-free information on) for those identified other vehicles. Mr. Newl called me to discuss the scope of questions 2 and 3. As a result of that discussion, I am modifying the IR letter.

I understand that while the Lincoln Town Car shares the same platform with the Ford Crown Victoria and Mercury Grand Marquis, specific components under the hood may be shared with many other Ford vehicles. In Mr. Newl's opinion, if Ford were to answer questions 2 and 3 at this time, without focusing in on certain components, the resulting response would contain a very complex matrix of vehicles and components, this vehicle resources and time from obtaining the information for ODI on the Lincoln Town Car vehicle, and would not likely provide more certainty in the identification of a specific component that may be responsible for the potential defect trend. Therefore, in the interest of providing a timely response to the IR letter, we agreed that Ford shall provide all information requested as it relates to the subject vehicles (the 1982 and 1985 Lincoln Town Cars) by the due date of January 23, 1989. We request that the additional information, in response to Question 2 as it relates to other identified vehicles, be provided by February 15, 1989 and focus on specific components to be identified by ODI following our examination of the damaged vehicles. This shall allow ODI to identify potential components that may exhibit a defect trend contributing to the risk of engine compartment fire.



AUTO SAFETY HOTLINE  
800 424-9288  
TOLL FREE, D.C. AREA CODE 202-475-0721

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