

Ford Motor Company

James P. Vondale, Director
Automotive Safety Office
Environmental & Safety Engineering

February 13, 2004

Ms. Kathleen C. DeMeter, Director
Office of Defects Investigation Safety Assurance
National Highway Traffic Safety Administration
400 Seventh Street, S.W.
Washington, DC 20590

Dear Ms. DeMeter:

Subject: EA02-025:NVS-213bby

The Ford Motor Company (Ford) response to the agency's January 7, 2004 e-mail requesting information related to alleged underhood fires on 1993 model year Lincoln Continental vehicles and updated information related to 1992-1995 model year Lincoln Town Car, Ford Crown Victoria, and Mercury Grand Marquis vehicles is attached.

Based on the data in the enclosed response, the rate of all alleged underhood fires for the 1993 model year Continental is 0.35 per 1,000 (9 in 25,747). This rate is low given the opportunities for modification, poor maintenance, improper repair, or abuse to which the vehicles may have been subjected over the past 11 years of service life. The rate of all alleged underhood fires for the subject vehicles in EA02-025 of 0.06 per 1,000 (46 in 809,363) is even lower than the Continental comparator. Ford notes the 1993 Continental uses a vacuum controlled speed control system and, therefore, does not use the electric speed control deactivation switch found on the subject vehicles in EA02-025.

If you have any further questions, please contact me.

Sincerely,

R. A. Nevi

James P. Vondale

Attachment

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OFFICE OF DEFECT
INVESTIGATION



FORD MOTOR COMPANY (FORD) RESPONSE TO EA02-025.

Ford's response to this Engineering Analysis Information request was prepared pursuant to a diligent search for the information requested. While we have employed our best efforts to provide responsive information, the breadth of the agency's request and the requirement that information be provided on an expedited basis make 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 Engineering Analysis.

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 on review of 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. Ford also notes that although electronic information was included within the scope of its search, Ford has not attempted to retrieve from computer storage electronic files that were overwritten or deleted. As the agency is aware, such files generally are unavailable to the computer user even if they still exist and are retrievable through expert means. 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, its protectorates and territories.

As requested, after each numeric designation, we have set forth verbatim the request for information, followed by our response. Unless otherwise stated, Ford has undertaken in this response to provide information dated up to and including January 7, 2004, the date of your e-mailed inquiry. Ford has searched business units and/or affiliates within the following offices for responsive documents: Ford Customer Service Division, Quality, Global Core Engineering, Automotive Safety Office, Manufacturing Executive Office, and Office of the General Counsel.

Request 1

Please provide the number of 1993 Model Year Lincoln Continental vehicles that Ford manufactured for sale or lease in the United States with a cruise control option. Please provide this data in a per month format.

Answer

Our records indicate that the approximate total number of 1993 model year Lincoln Continental vehicles manufactured by Ford for sale or lease in the United States is 25,747. Model year 1993 Continental vehicles are equipped with vacuum operated speed control as standard equipment. The requested vehicle monthly sales volume information is provided electronically in Appendix A (file: 2004-02-12_A) on the enclosed CD.

Request 2

State the number of each of the following, received by Ford, or of which Ford is otherwise aware, which relate to "key off" under hood fires in 1993 Model Year Lincoln Continental vehicles that were manufactured with a cruise control option:

- a. Consumer complaints, including those from fleet operators;

- b. Field reports, including dealer field reports;
- c. Reports involving a crash, injury, or fatality, based on claims against the manufacturer involving a death or injury, notices received by the manufacturer alleging or proving that a death or injury was caused by a possible defect in a subject vehicle, property damage claims, consumer complaints, or field reports;
- d. Third-party arbitration proceedings where Ford is or was a party to the arbitration; and, Lawsuits, both pending and closed, in which Ford is or was a defendant or codefendant;

Answer

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), Intensified Customer Concern Definition (ICCD) data maintained by Ford's Quality Office, fleet reports maintained in a Fleet Test Database, and claim and lawsuit information maintained by Ford's Office of the General Counsel (OGC).

Descriptions of the FCSD owner and field report systems, the ICCD and the Fleet Test Database systems, and the criteria used to search each of these are provided electronically in Appendix B (file: 2004-02-12_B) on the enclosed CD.

Categorizations developed for use in our September 26, 2003 response to the agency regarding alleged underhood fire in 1982-1995 model year Lincoln Town Car, Mercury Grand Marquis, and Ford Crown Victoria vehicles (EA02-025) were also used in preparation of this response. These categorizations are listed below:

<u>Category</u>	<u>Allegation</u>
F1	Alleged underhood fire, non-crash, key-off
F3	Alleged underhood fire, non-crash, unknown key position
FB4	Ambiguous fire source, non-crash, unknown key position*

*We are providing electronic copies of these ambiguous 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.

Owner Reports: The search and review of the Ford Master Owner Relations Systems (MORS) database records, as described in Appendix B, identified the following number of owner reports in accordance with the categories described above:

<u>Category</u>	<u>F1</u>	<u>F3</u>	<u>FB4</u>
<u>Reports</u>	1	4	1

Copies of these owner reports are provided in the MORS III portion of the electronic database contained in Appendix C (file: 2004-02-12_C) on the enclosed CD. The categorization of each report is identified in the "Category" field. The four reports categorized "F3" are included due to the allegation of an underhood fire; the position of the key could not be determined from the information available. The ambiguous report categorized "FB4" only noted a vehicle fire. No

other details were provided. We were able to identify a responsive (i.e., not ambiguous) duplicate owner report for an alleged incident, and this duplicate report is marked accordingly, but not included in the count above.

Legal Contacts: Ford is providing in Appendix B a description of Legal Contacts and the Litigation Prevention activity that is responsible for this information. To the extent that responsive (i.e., not ambiguous) owner reports reflect that they are Legal Contacts, Ford has gathered the related files from the Litigation Prevention section. Based on this search, three files corresponding to responsive owner reports were identified; the associated documents are provided in Appendix D. Ford notes it was unable to locate documents for one of the files.

ICCD Information: The ICCD database was not created until the 1998 model year and, therefore, was not searched.

Fleet Reports: In addition to fleet reports that may be contained in the owner reports or field reports identified in this response, Ford conducted a search of its Fleet Test Database, as described in Appendix B, for reports that may relate to the alleged defect in the subject vehicles. Ford did not identify any responsive fleet reports.

Field Reports: The search and review of the Ford Common Quality Indicator System (CQIS) as described in Appendix B, identified the following number of field reports in accordance with the categories described above:

Category	F1	F3	FB4
Reports	0	0	1

A copy of this field report is provided in the CQIS portion of the electronic database contained in Appendix C. The categorization of the report is identified in the "Category" field. This ambiguous report was included due to the implied fire under the hood, but the position of the key during the fire could be not determined from the information available.

Unified Database: Ford searched the unified database (UDB) as described in Appendix B and identified the following number of reports in accordance with the categories described above:

Category	F1	F3	FB4
Reports	0	4	4

Copies of these reports are provided in the UDB portion of the electronic database contained in Appendix C. The categorization of the reports is identified in the "Category" field. The four reports categorized "F3" are included due to the allegation of an underhood fire; the position of the key could not be determined from the information available. The ambiguous reports allege a fire, but the location of the fire in the "FB4" reports and the position of the key during the fire could be not determined from the information available.

Injury Incident Claims: For purposes of identifying alleged injuries potentially related to the alleged defect, Ford has reviewed responsive (i.e., not ambiguous) owner and field reports, lawsuits and claims. Based on a reasonable and diligent search, no reports were identified that alleged injuries.

Claims, Lawsuits, and Arbitrations: For purposes of identifying claims, lawsuits and arbitrations potentially related to the alleged defect, Ford searched claim and lawsuit information maintained

by Ford's OGC. Ford's OGC is responsible for handling product liability lawsuits, claims, and consumer breach of warranty lawsuits and arbitrations against the company.

Based on a reasonable and diligent search, Ford located one subrogation claim that appears to relate to the alleged defect in the subject vehicles. Ford has also located one lawsuit that is duplicative of a MORIS report and is also ambiguous as to whether it meets the alleged defect criteria. We have included this lawsuit as a "non-specific allegation" for your review because of the broad scope of the request. Based on our engineering judgment, the information in this lawsuit is insufficient to support a determination that it pertains to the alleged defect. We are providing the requested detailed information, where available, on the responsive claim and the ambiguous lawsuit in our Log of Lawsuits and Claims, as Appendix E (file: 2004-02-12_E) on the enclosed CD. Copies of responsive documents are provided in Appendix D. Ford notes that hand-written notes on one page were redacted.

During our search, we located a lawsuit for a vehicle that was reported to be a Lincoln Continental by the insurance company filing the claim, but our subsequent analysis of the VIN coding has identified the vehicle as a Lincoln Town Car. This lawsuit would not be responsive to the current inquiry, but would be responsive to the original EA02-25 inquiry. We are including the information in our Log of Lawsuits and Claims in Appendix F (file: 2004-02-12_F) on the enclosed CD. Copies of responsive documents from this lawsuit are provided in Appendix G.

With regard to these lawsuits and claims, Ford has not undertaken to contact outside law firms to obtain additional documentation.

Based on the data above, the rate of all alleged underhood fires for the 1993 model year Continental is 0.39 per 1,000 (10 in 25,747). This rate is low given all the opportunities for modification, poor maintenance, improper repair, or abuse to which the vehicles may have been subjected over the past 11 years of service life. The rate of all alleged underhood fires for the subject vehicles in EA02-025 of 0.06 per 1,000 (48 in 809,363) is even lower than the Continental comparator. Ford notes the 1993 model year Continental uses a vacuum controlled speed control system and, therefore, does not use the electric speed control deactivation switch found on the subject vehicles in EA02-025.

Request 3

Separately for each item (complaint, report, claim, notice, or matter) within the scope of your response to the previous request, state the following information:

- a. Ford's file number or other identifier used;
- b. Vehicle's VIN;
- c. Vehicle's make, model and model year;
- d. Vehicle's mileage at time of incident;
- e. Incident date;
- f. Report or claim date;
- g. Whether a fire is alleged;
- h. Alleged cause of the fire;
- i. Complaint summary; and,
- j. Consumer comments;

Answer

Appendices C and E contain the information requested as part of the electronic data.

Request 4

Please update the table "tblPopulationData" in the file 2003-09-26_Appendix_A.mdb that was provided by Ford in response to request number 1 of the July 30, 2003 Information Request Letter with a column that indicates if the vehicle was manufactured with an Anti Lock Braking System.

Answer

The updated table is provided in Appendix H (file: 2004-02-12_H) on the enclosed CD.

Request 5

Explain why the complaints / lawsuit (copies faxed to Ford by ODI on 1/7/04) that were provided in response to discovery questions that Ford has answered in various law suits were not identified and provided to ODI in response to the IR letter sent on 7/20/03.

Answer

As noted in our September 26, 2003 response and a July 31, 2003 telephone conversation with Messrs. Jeffrey Quandt and Bruce York of the agency, Ford provides copies of owner reports to the extent that they are available. The extreme age of some of the reports and the implementation of Ford's record management policies may cause some reports to become unavailable over time.

Ford understands this request to address the agency's July 30, 2003 letter to Ford (EA02-025). The "subject vehicles" in that letter were defined to be 1993-1995 model year Town Car, Grand Marquis, and Crown Victoria vehicles manufactured after November 30, 1992 (the end of the Safety Recall 99S15 population).

Four of the seven reports were apparently purged pursuant to customary data management practices after Ford's response to inquiry PE98-055, but before Ford's receipt of inquiry EA02-025. Ford notes that the discovery responses in question apparently included wholesale reproductions of Ford's responses to inquiry PE98-055 (i.e., the reports forwarded to Ford by the agency on January 7, 2004, were reproductions of Ford's prior responses to the agency's 1998 inquiry; they were not generated independently from new database searches for the lawsuit discovery productions).

The vehicle (VIN: 2FACP74WXPX119881) in the first report was manufactured on October 16, 1992, placing it inside the Safety Recall 99S15 population and, therefore, outside the definition of "subject vehicle" in the agency's July 30, 2003 letter.

The second report (VIN: 2MELM74W0RX852011) was opened in 1994 and would have been purged from our database in early 2000 in accordance with the 5-year record management procedures in place at that time. Accordingly, this report was not available for inclusion in our response to the agency's July 30, 2003 letter. However, this incident was reported in

Appendix VII of our March 11, 1999 response to PE98-055.

The third report (VIN: 2FALP74W2SX135653) pertained to an alleged alternator fire and was included in the MORS III data retrieved during the initial search for documents potentially related to EA02-025. It was not included in our September 28, 2003 response because it specifically identified some component other than the speed control deactivation switch as the cause of the alleged fire. However, based upon the categories we included in that response, we now believe that this report should have been categorized as F3 (Alleged underhood fire, non-crash, unknown key position, no alleged speed control deactivation switch failure). In doing so, the incident count in response to Request 2 of our September 26, 2003 response to EA02-025 (speed control related fires) would remain the same, and the total incident count in response to Request 4 (all alleged underhood fires) would now be 46 instead of the reported 45.

The fourth report (VIN: 2FALP74W5RX128231) was opened in 1994 and would have been purged from the database in early 2000 in accordance with the 5-year record management procedures in place at that time. Accordingly, this report was not available for inclusion in our response to the agency's July 30, 2003 letter. However, this report was provided in Appendix I-B of our March 11, 1999 response to PE98-055.

The fifth vehicle (VIN: 1LNLM81W5PY820823) was noted in a lawsuit. This vehicle was manufactured on September 3, 1992, placing it inside the Safety Recall 99S15 population and, therefore, outside the definition of "subject vehicle" in the agency's July 30, 2003 letter.

The sixth report (VIN: 1LNLM82W6RY739739) was opened in 1995 and would have been purged from the database in early 2001 in accordance with the 5-year record management procedures in place at that time. Accordingly, this report was not available for inclusion in our response to the agency's July 30, 2003 letter. However, this report was provided in Appendix III-D of our February 15, 1999 response to PE98-055.

The seventh and final report (VIN: 1LNLM81WXSYP10944) was opened in 1995 and would have been purged from the database in early 2001 in accordance with the 5-year record management procedures in place at that time. Accordingly, this report was not available for inclusion in our response to the agency's July 30, 2003 letter. However, this report was provided in Appendix III-B of our February 15, 1999 response to PE98-055.

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