

Ford Motor Company

9/30/05

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

September 26, 2005

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

Dear Ms. DeMeter:

Subject: EA04-034:NVS-213dsy

On September 8, 2005 your office requested additional information relating to steel wheels on 2003 - 2005 model year Crown Victoria police and taxi vehicles. The following information is being provided in response to your request. We have listed each of your requests and then provided our response.

Request 1

Supply the names and titles of the Ford personnel who were at the meeting we had at Ford's office on 8/30/05.

Answer

The following Ford personnel attended the meeting:

Pete Souchock	Manager, North American Safety Investigations
David Ott	Manager, External Safety Investigations
Eric Eiswerth	External Safety Investigations Engineer
Keith Campbell	Supervisor, North America Tire/Wheel Engineering
Scott Clark	Commercial Vehicle Operations Modified Vehicle Specialist
Steve LaRouche	Central Laboratory Product Materials Engineer
Patrick Nailos	Central Laboratory Development Analyst

Request 2

Send to me the tire from the New Stanton crash report (wheel A) and the subject wheel from the PA State police rapid deflation report (wheel B) which were reviewed during the 8/30/05 meeting at Ford's office. Please provide the shipping details (carrier, AWB/tracking number) when known.



Answer

The requested parts were sent to your office on September 21, 2005 via Action Freight Express, bill of lading number 1037423.

Request 3

Provide an electronic copy of the Excel spreadsheet HL (Hayes Lemmerz) is using to record data collected from subject wheel inspections and testing.

Answer

A copy of the spreadsheet is provided electronically in Appendix A (filename: 2005_09_28_Appendix_A) on the enclosed CD.

Requests 4 & 5

Have HL collect and package the failed subject wheels from the following 6 vehicles/warranty claims [REDACTED], and 3X114630. The first four wheels were identified and set aside during my visit. The last two were inspected during my visit but were placed back on pallets; HL will need to search for these two.

Have HL send the 6 failed subject wheels identified above to Bob Esser at VRTC/USDOT, PO Box B371, Building 60, 10820 State Rt. 347, East Liberty, OH 43319-0337, and phone 937-66-4511, x285. Please provide the shipping details (carrier, AWB/tracking number) when known.

Answer

Wheels were shipped to VRTC on September 9, 2005 via FedEx, tracking numbers are 138537281010386, 671920828136, 671920828147, 671920828158, 671920828169 and 671920828170. Tracking number records indicate the parts were delivered on September 13, 2005.

Request 6

As far as ODI is concerned, Ford and HL can discard; 1) any 'CD' level subject wheels that are currently at the HL facility or are received at any time in the future, and 2) any subject wheels of any design level that HL tested prior to 8/30/2005 and determined that no crack or air leak existed.

Answer

Ford and HL understand that NHTSA is not requesting these wheels to be retained.

Request 7

ODI requests that HL retain all other subject wheels currently at the HL facility for the time being.

Answer

These wheels will be retained in accordance with your request.

Request 8

For any future non-"CD" level subject wheels HL processes and or tests, ODI requests that these wheels be held at the HL facility for the time being (including those where no crack or leak was found).

Response

Any such non-"CD" wheels [3W73-CF, 4W73-AA, 3W73-CG or 5W73-AA] that are the subject of allegations of cracks, or that are associated with this subject will be retained in accordance with your request.

Request 9

As we discussed today, ODI is requesting an update of AWS, CQIS and MORSS3 complaint records Ford has received since the 4/19/05 EA IR response cutoff date. The AWS records are a priority for ODI. Please advise an approximate submission date for this data.

Response

A copy of updated warranty, field and customer reports is provided electronically in Appendix B (filename: 2005_09_26_Appendix_B) on the enclosed CD. Each report is categorized similar to our EA response dated June 1, 2005. Reports received from April 19, 2005 through August 31, 2005 were reviewed individually to identify reports alleging a cracked wheel, and categorized accordingly.

Our review of the reports in response to your request identified three allegations of rapid air loss.

VIN 2FAFP71W23X [REDACTED] CQIS report number 5GTD2106. This report was submitted by the Pennsylvania State Police and alleges that the left rear tire quickly deflated while traveling at 35 mph. There is no warranty claim involving this vehicle's wheels. This allegation is consistent with VOQ 10129318 in terms of incident date, vehicle owner, mileage and description. The VOQ alleges "...the trooper felt the left rear tire go flat, it was not a(n) instantaneous deflation, but once started, did deflate rather quickly."

VIN 2FAHP71W14X [REDACTED] CQIS report number 5HSAR350. This report alleges a sudden loss of air pressure in the right front tire while the vehicle was in pursuit, traveling at 70 mph. The servicing dealership was contacted and was unable to provide more information. Appendix C (filename: 2005_09_26_Appendix_C) on the enclosed CD includes four photos of the alleged cracked wheel. Analysis of the wheel photos is inconclusive as we are not able to identify if the wheel is cracked, or if a crack exists, if it caused a loss of tire pressure. In fact, photo number 4 (file 5HSAR350_4.jpg) appears to show a rim/disc interface that is inconsistent with a CF wheel design. Ford is unable to analyze the wheel as it was scrapped on September 1, 2005, shortly after the report was submitted. A warranty claim relating to this subject was submitted for this vehicle, but is not included in the updated warranty database.

provided in Appendix B because it was not loaded into the Ford AWS system prior to the August 31, 2005 cut-off used for the query. A copy of the warranty claim, which does not include an allegation of rapid air loss, is provided in Appendix C.

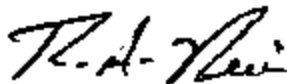
VIN 2FAFP71W03X[REDACTED]; CQIS report number 5EWAJ549, MORS report number 1483431435. The warranty history of this vehicle does not include a claim involving wheels after all five were replaced in accordance with Ford Safety Program 03S05, performed August 5, 2003. The CQIS and MORS reports allege the right front wheel developed a crack and resulted in "catastrophic air pressure loss." Reportedly, the vehicle came into contact with a guard rail and suffered body damage. This incident allegedly occurred at the California Highway Patrol's (CHP) EVOC test track during driver training exercises. We note that vehicles involved in this type of training service are frequently exposed to operating conditions that are even more extreme in both severity and frequency than typically harsh police vehicle service. Ford has attempted to retrieve the subject wheel for analysis, but CHP has been unable to locate it, and believes it has been scrapped.

As stated in our EA response, we note that inaccurate concern descriptions make an accurate analysis of concern rates very difficult. Our extended warranty program was intended to address wheels with cracks as evidenced by leaks or vibration. As you were able to observe during your visit, analysis of returned parts has found that many reports or claims involve wheels found upon inspection to have no crack or leak. We also again note that, without visually observing a wheel associated with a report or claim, there is uncertainty as to the design level of the actual affected wheel. Our analysis in support of this investigation has found that warranty claims have accurately identified the design of the wheel less than 25% of the time.

The data submitted with this response is consistent with the information previously submitted. Ford continues to believe that the actions already in place appropriately address any concerns that may arise related to this subject, and that no further action is warranted.

If you have questions, please contact me.

Sincerely,



R. A. Nevl
Assistant Director
Global Automotive Safety Compliance

Attachments