



5/30/06

James P. Vondale, Director
Automotive Safety Office
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Fairlane Plaza South
330 Town Center Drive
Dearborn, MI 48126-2738 USA

May 24, 2006

Mr. Jeffrey Quandt, Chief
Vehicle Control Division
Office of Defects Investigation Safety Assurance
National Highway Traffic Safety Administration
400 Seventh Street, S.W.
Washington D.C. 20590

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NHTSA

Dear Mr. Quandt:

Subject: EA04-034:NVS-213dsy

This is in response to the agency's April 21, 2006, May 12, 2006, and May 16, 2006, emails requesting additional information relating to the subject investigation. We have listed each of your requests, followed by our response.

April 21, 2006 email

Request 1

HL made a presentation to NHTSA describing their Sedalia operations. A copy of the presentation was offered to NHTSA; I declined the document and advised that I would rely on HL/Ford ASO to make a determination as to what to submit to NHTSA and whether it required confidentiality or not. I will leave that with you.

Response

The Hayes-Lemmerz (HL) presentation material offered to the agency during the April 18, 2006, review at the HL Sedalia facility contains confidential information describing the HL manufacturing operations and organization and does not contain information relating to the subject investigation or the alleged defect. Ford has elected not to submit a copy of the presentation to the agency at this time, but would be pleased to provide a copy should the agency desire a copy in the future.

Request 2

You advised that Ford was nearly ready to submit the data from the HL crack propagation study (which used a wheel from the PA State Police) including the wheel maps that were shown to us at Sedalia. Please advise when this has been mailed, including the shipping details, so that I can track its progress.



Response

Your office has confirmed receipt of the requested information that was submitted to the agency on April 20, 2006.

Request 3

I asked HL and Ford to see if the wheel from the Glynco, GA incident can be located; I provided details of the vehicle it was removed from and the dealership it was returned to. If the wheel can be located, Bill and I would like to inspect it during our visit to the Northville facility. Please do not do any destructive testing prior to this.

Response

The wheel from the Glynco, GA incident was returned to Ford and provided to HL as part of the warranty parts return program. The wheel was reviewed at HL during the agency's May 10 and 11, 2006, visit. We have instructed HL to process the wheel similar to other warranty return wheels. Ford and HL have no plans at this time to conduct any destructive testing.

Request 4 & 5

Bill and I need to change the date of our visit to HL's Northville facility to May 10 and 11 (not May 2 and 3); please advise any problems. The primary purpose of the trip is to review and inspect wheels returned from field service under the warranty extension programs. We can discuss and agree an agenda for the visit over the coming days.

For the visit to Northville, I requested that Ford/HL make the following 4 wheels available for inspection;

- a. CHP training facility incident.
- b. Pa State Police crash wheel (the remains that are left over from the CL analysis, Bill has not seen this).
- c. First crack propagation study performed by HL.
- d. Second crack propagation study by Ford (assuming it is completed).

Response

The wheels described above were reviewed during the agency's May 10 and 11, 2006, visit to HL's Northville facility, except the second crack propagation study wheel, which had not completed testing.

Request 6

You advised that HL will be producing wheel maps for each field return wheel they inspect; Bill and I will want to review these maps during our visit; at some point I will want to get copies of them.

Response

Preliminary copies of approximately 130 wheel maps that HL produced were provided during the agency's May 10 and 11, 2006, visit to the HL Northville facility. A complete copy of the wheel maps will be provided when the inspections are complete.

Request 7

Bill and I will want to review the process HL used to test for and identify multiple cracks in the field return wheels.

Response

The process was demonstrated to the agency during the May 10 and 11, 2006, visit to the HL Northville facility.

Request 8

Bill requested a new shot peen level wheel for assessment purposes at the VRTC facility. He can collect it during the Northville visit.

Response

HL provided a shot peen level wheel and wheel component parts to the agency on May 11, 2006.

Request 9

Per HL's request, we can discuss which wheels need to be retained at HL and which ones can be discarded.

Response

Ford will continue to work with the agency to determine the disposition of the warranty return parts.

Request 10

I made a request for an update to the warranty and complaint data for wheel fracture reports (similar to what was last provided on 9/26/2005); we discussed a pre-April 1, 2006, repair date cutoff (last submission was pre September 1, 2005, cutoff).

Response

A copy of updated warranty, field and customer reports is provided electronically in Appendix A (filename: 2006_05_24_Appendix_A) on the enclosed CD. Each report is categorized similar to our responses dated June 1, 2005, and September 26, 2005. Reports received from September 1, 2005, through April 1, 2006, were reviewed individually to identify reports alleging a cracked wheel, and categorized accordingly. None of the reports allege a rapid air loss or a loss of vehicle control.

May 12, 2006 email

Request 1

Per our discussion at Hayes yesterday, ODI is requesting a copy of the document we reviewed concerning weld inspection and repair processes used at the Sedalia facility. I understand the document is confidential and that Ford will submit the response to NHTSA's OCC per the usual practice.

Response

The weld inspection and repair specification will be submitted under separate cover with a request for confidentiality to the agency's Office of Chief Counsel.

May 16, 2006 email

Request A

Glynco wheel: I can confirm that the VIN of the Glynco, GA (FLETC) incident vehicle was 3X [REDACTED], RO mileage 5,298. The wheel we identified at HL appears to be the Glynco wheel; I labeled it NS11 with a white marker. After testing at HL (see item E), please ensure the wheel is retained until we can discuss further analysis/next steps.

Response

The Glynco wheel will be processed similar to the other warranty return wheels; no destructive testing is planned.

Request B

Warranty details: I was unable and or neglected to obtain the warranty details for the following 5 wheels (large crack wheels). Can you provide the dealer name/phone number and RO number for the following wheel claims (ASAP is possible)?

- 1) VIN 3X [REDACTED] (Omaha NE) – I marked this wheel NS2.
- 2) VIN 4X [REDACTED] (Omaha NE) – This wheel was marked by HL as WR83.
- 3) VIN 4X [REDACTED] - This wheel was marked by HL as WR89.
- 4) VIN 4X [REDACTED] - This wheel was marked by HL as WR2.
- 5) VIN 4X [REDACTED] - This wheel was marked by HL as WR61.

Response

The requested information is provided in the warranty claim data provided in Appendix A.

Request C

Manufacturing line layout/weld operations: On the morning of 5/11 (before you arrived) Chris Putz briefly described the layout and welder configurations for the S14, S15, and S16 assembly lines used at Sedalia. I need HL to provide a brief description of each line explaining the general operation, operator(s) process, and layout (drawing or

sketch would be helpful); additionally I need to know for each line: 1) what welder markings (numbers) would be stamped on the wheel; 2) where the welder mark would be stamped on the wheel; 3) where on the wheel (angular location) the 4 weld heads start the welding operation (i.e., where the weld overlap should be); and 4) the direction the welds are applied/laid down (or which way the wheel rotates). Apparently one of the lines was only used for production of wheels used for recall 03S05; please identify which line this was and the approximate dates it was in operation.

Response

The manufacturing line layout and weld operation information will be submitted under separate cover with a request for confidentiality to the agency's Office of Chief Counsel.

Request D

Complaint/Warranty update: Please advise likely timing for the submission of updated complaint and warranty data (requested 4/18 during visit to Sedalia, and by email 4/21).

Response

The updated warranty, customer and field report information is provided in Appendix A.

Request E

HL processing of wheels marked NS1 to NS20: In addition to the data HL is collecting during their inspection process (warranty details, leak test result, wheel part number, date of weld, welder stamp/assembly line, crack locations, damage locations, AS/CMM data, etc), I requested that they also record the location of the weld overlaps for the wheels I marked NS1 to NS20 (Chris said he would mark the overlaps on the wheel map and record my number markings in his spreadsheet).

Response

The requested information will be recorded on the wheel maps for those wheels. Wheel maps will be provided to the agency when the warranty parts return analysis is complete.

Request F

Re-inspection of 4 fractured survey wheels: There were one or two discrepancies in the results reported for the fractured wheels; these apparently involved the number of, locations of, and/or the length of the reported cracks. Chris was going to review this matter further; please resubmit any of the wheel maps that are revised as a result of his work.

Response

The four fractured survey wheels were inspected again at HL and one wheel map was determined to be mis-labeled with an area identified as flange damage instead of a crack. HL has revised the wheel map. That map is provided electronically in Appendix B (filename: 2006-05-24_Appendix_B).

Request G

Disposal of 'CD' Level Wheels: We spoke about this yesterday regarding 'CD' wheels currently occupying space at the Northville facility. When we first arrived, Chris advised that HL had tested about 130 wheels to date (using the process he later demonstrated to us). He subsequently provided 65 wheel maps and advised these were all of the 'CF' and 'AA' level wheels tested at this time. Per our discussion, can you have HL confirm that the other 65 wheels tested were 'CD' specification wheels? If this is the case, then ODI would request that HL retain two randomly chosen skids (~40 wheels) of untested 'CD' level wheels until further notice (with the return paperwork intact); ODI has no objection to Ford/HL discarding the remaining 'CD' level wheels (tested and untested) as you choose. You mentioned that you would have HL collect the warranty return paperwork prior to disposal of the 'CD' wheels.

Response

HL has confirmed that of the 130 warranty return wheels inspected, approximately 65 were CF or AA and 65 were CD design level. HL will collect the warranty return paperwork for the CD wheels, and retain 40 randomly selected CD wheels that have not been inspected.

If you have questions, please contact me.

Sincerely,



R. A. Nevi
Assistant Director
Global Automotive Safety and Compliance

Attachments