

*Ford Motor Company*

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4/4/07

Automotive Safety Office  
Environmental and Safety Engineering

December 14, 2006

Ms. Kathleen C, DeMeter, Director  
Office of Defects Investigation Safety Assurance  
National Highway Traffic Safety Administration  
400 Seventh Street, S.W., Room 5326 NVS-213  
Washington D.C. 20590

Dear Ms. DeMeter:

Subject: EA04-034:NVS-213dsy

This is in response to the agency's November 22, 2006, email requesting additional information relating to the subject investigation. We have listed each of your requests, followed by our response.

Request 1

Provide an update of the complaint and warranty information on this issue. The last update provided was through April 1, 2006. Please ensure that the updated claims data includes the number of wheels replaced/reimbursed on each claim.

Answer

A copy of updated warranty, field, and customer reports are provided electronically in Appendix A (filename: 2006-12-14 Appendix A) on the enclosed CD. Each report is categorized similar to our responses dated June 1, 2005, September 26, 2005, and May 24, 2006. Appendix B (filename: 2006-12-14 Appendix B) contains a list of the number of wheels replaced on each warranty claim from April 1, 2006, through October 31, 2006. Warranty claims not included in Appendix B did not have a wheel replaced.

Request 2

You advised that Ford was able to provide dynamic wheel loading data collected from an earlier model year CVPI vehicle for ODI review. In order to ensure we understand the data fully, I'd like to arrange a discussion between the NHTSA engineer who is familiar with this type data (Garrick Forkenbrock from VRTC) and the Ford person who understands how the data was collected. Please let me know when Ford is available for this discussion. After the discussion ODI will make a formal request for the data.



Answer

A discussion with Ford and NHTSA engineers familiar with road load data and data acquisition was held December 13, 2006. As discussed in that meeting, Ford will provide a description of vehicle durability procedures, data recorded and peak event values under separate cover to the agency's Office of Chief Counsel.

Request 3

ODI previously supplied CD-ROMs containing the information (photographs, etc.) produced by AFI from their analysis of the OSP incident wheel. Using this information, produce a wheel map which outlines Ford's assessment of the OSP wheel fracture surface in the same manner as was done for the PSP and CHP wheels (see Ford's 9/17/2006 submission to ODI, Appendix A).

Answer

Ford engineers examined the photographs provided by AFI from the OSP wheel and provided observations recorded on the wheel map provided electronically in Appendix C (filename: 2006-12-14 Appendix C) on the enclosed CD. The observations recorded on the wheel map are based on review of photographs, not actual parts.

Request 4

On November 7, 2006, I requested via email that Ford make arrangements to collect three wheels from a dealership in Virginia (Koons Sterling Ford) for possible additional analysis. Please advise the status of this request.

Answer

The wheels were received and reviewed by Hayes-Lemmerz, and the wheel maps, Akron Standard and CMM data is provided in Appendix D (filename: 2006-12-14 Appendix D) on the enclosed CD.

Request 5

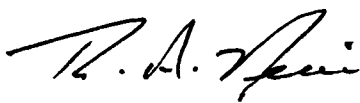
In a November 4, 2006, phone conversation, I advised you of an anomaly with the current warranty extension program (04M05) which excludes MY 2005 vehicles built after December 2004 on the base that these vehicles were manufactured with shot-peen wheels. In police use of the subject vehicles wheel assemblies get transferred from one vehicle to another. Some police agencies have told me that their request for replacement of a leaking (fractured) non-shot peen wheel under the 04M05 program was denied because the vehicle it was installed on was outside the scope of the program. During our discussion, I suggested that the program needs to be amended to ensure eligible wheels (regardless of the vehicle they are on) which have fractured and are leaking will be covered by 04M05; this is the only way the field experience of the wheels can be accurately tracked. You agreed to discuss this with your service colleagues; please provide a status on this issue.

Answer

The 04M05 warranty extension program applies only to 2003, 2004, and 2005 commercial Crown Victoria vehicles originally equipped with non-shot peened wheels. Owner letters for the 03S05 safety recall campaign and 04M05 extended warranty action strongly recommend not swapping wheel and tire assemblies among vehicles. If an owner does install wheels manufactured prior to the implementation of the shot-peen process on a vehicle originally equipped with shot-peened wheels, the vehicle three year/36,000 mile warranty applies.

If you have questions, please contact me.

Sincerely,



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

Attachments