

Ford Motor Company

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

May 14, 2004

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: PE04-022:NVS-212pco

The Ford Motor Company (Ford) response to Request 8 in the agency's March 10, 2004 Preliminary Evaluation (PE04-022) Information request concerning reports alleging that power sliding doors do not latch adequately and may open while a vehicle is in motion in model year 1999-2003 Ford Windstar vehicles is attached. As referenced in Ford's response, dated April 30, 2004, documents responsive to Request 8 were not provided with our April 30 response because the agency requested that the documents be provided in electronic format if possible; Ford required additional time to convert the documents into electronic files.

As the agency is aware, Ford has developed processes for identifying, investigating, and assessing potential safety or quality concerns in our products. In responding to this request, Ford has conducted a reasonably diligent search of those organizations that normally would be involved in our safety or quality investigation processes related to the alleged defect. Reports that alleged power sliding door (PSD) opening while driving on the subject vehicles were previously investigated through Ford's Critical Concern Review Group (CCRG) process. Ford is producing related CCRG investigation documents in response to this request. Documents concerning the CCRG activities for which Ford will request confidential treatment on the grounds that such items contain commercially sensitive business information and/or trade secrets will be submitted under separate cover to the agency's Office of Chief Counsel in Appendix J (file: 2004-05-14_Appendix_J). This appendix will also include a print copy of a fault tree diagram (bates number 15467) that was referenced in response to Request 10 in Ford's April 30, 2003 submission.

Further, Ford is voluntarily submitting additional documents that, while not directly related to Ford's CCRG investigation process, may assist in the agency's analysis of this matter. Copies of documents concerning such activities that are not customarily disclosed outside of Ford will be submitted to the agency's Office of Chief Counsel under separate cover with a request for confidentiality in Appendix K (file: 2004-05-14_Appendix_K).



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Documents for which Ford is not requesting confidentiality are submitted in Appendix L (file: 2004-05-14_Appendix_L). Eight videos and one CD containing instructions for servicing PSDs in the subject vehicles are part of this appendix and are included in the package.


Ford is not producing documents responsive to this request that are protected from disclosure by attorney-client privilege, work-product doctrine or other applicable immunity. Documents protected from disclosure on these bases are described in a privilege log submitted in Appendix M (file: 2004-05-14_Appendix_M).

Subsequent to our April 30, 2004 response to your March 10 inquiry, Ford identified additional owner and field reports that may relate to the alleged defect in the subject vehicles. These reports are provided in Appendix C1 (file: 2004-05-14_Appendix_C1) on the enclosed CD. The reports are categorized as described on page 3 (Request 2) of our April 30 response. Subsequent to our previous response, we also identified an additional internal service message (ISM 99-03-005) that was published in March 1999 to address sliding door alignment issues in model year 1999 Windstar vehicles; the ISM is provided in Appendix I1 (file: 2004-05-14_Appendix_I1).

As previously discussed in Ford's response to PE04-022, Ford first began an investigation into alleged unintended power sliding door opening on 1999 model year Windstar vehicles (first introduction of the PSD in Ford vehicles) based on a March 1999 report containing such an allegation. Subsequent in-depth investigation and analysis of reported unintended door openings included vehicle inspections, customer interviews and instrumentation of repurchased and customer vehicles that allegedly experienced one or more unintended door openings. The result of this intense investigation effort is Ford's determination that, when properly closed, the PSD cannot and will not open while a vehicle is being driven. Rather, Ford believes those reports to involve incidents of the PSD coming to the secondary latch position and not opening beyond that position. These earlier findings are consistent with our findings in a review of information and documents gathered in the preparation of this response. Ford believes incidents of power sliding doors coming to the secondary latch position are similar to incidents that the agency has investigated in SQ00-008 and concluded that the events of the sliding door rear latch popping open to a secondary latch position do not constitute a safety related defect.

If you have any questions concerning this response, please feel free to contact me.

Sincerely,



James P. Vondale

Attachment