

*Ford Motor Company*

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

June 11, 2004

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

Dear Ms. DeMéter:

Subject: PE04-033:NVS-212cag

The Ford Motor Company (Ford) response to the agency's April 23, 2004 letter concerning reports alleging rear door opening while the vehicle is in motion on 2000 model year Ford Focus vehicles is attached.

Ford understands the "alleged defect" to relate to rear door latches not engaging resulting in rear doors opening while a vehicle is in motion. Accordingly, Ford is providing information and reports concerning alleged door openings associated with latch engagement that allegedly occurred while a vehicle was in motion. In addition, this response also provides ambiguous reports of alleged door openings when the vehicle is in motion for which the cause of the alleged opening could not be specifically determined or for which we are unable to establish the location of the purported door opening. Alleged door openings in a stationary vehicle are not included in Ford's response.

As the agency is aware, Ford products sold in North America utilize latches with two levels of engagement: primary and secondary. In the course of preparing our response to this information request Ford has located 47 non-duplicative reports alleging that a rear door opened due to latch function while a vehicle was in motion. Ford is unable to state how many of the allegations involve complete door opening. In the unlikely event that all 47 reports are responsive, the number of responsive non-duplicative reports alleging rear door opening due to insufficient latch engagement results in an incident rate of only 0.180 R/1000. Even if the agency includes the ambiguous reports of alleged door openings, the incident rate rises to only 0.225 R/1000.

However, we believe that, as in prior investigations related to door latching, many of these allegations of doors opening that occurred while a vehicle was in motion may actually relate to a door opening to the secondary latch position. The agency has concluded in previous investigations that doors engaged in the secondary latch position while the vehicle is in motion are not "open" and, therefore, do not constitute an unreasonable risk to motor vehicle safety.

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Ford notes that customers observations that a door "opened" are typically based on the obvious indications that a door is not fully closed, such as the illuminated door ajar light and dome light, or noise, such as the increase in wind or road noise or the clunking of the latch against the striker that occurs when a door is not fully latched. The illuminated lights and the noises alert a customer that a door is not fully closed (not in the primary latch position) and are present when the door is securely latched in the secondary latch position. Accordingly, the warning light and overt indicators alert the customer to a potential concern even though the door is actually securely latched in the secondary position.

Ford's investigation reveals just one incident where the customer alleges a rear door opened and caused injuries to a passenger sitting in the second row. The injuries alleged in this event are minor: "bruising on his left side and wrist injury." As part of this investigation, Ford contacted the service manager at the servicing dealership in North Carolina, who stated that he personally inspected the vehicle and actuated the latch to verify the function of the mechanism and found no corrosion. He determined that the latch was functioning properly. (Ford also notes that vehicles in North Carolina do not typically experience corrosion with three years of service.) Other than this single report, no other allegation of injuries due to door opening was located.

In the course of its investigation, Ford noted that three VOQs allege door latch corrosion as a possible cause for the door latch engagement concern. In the 2000 Model Year Scheduled Maintenance Guide, Ford recommends checking all hinges, latches, and outside locks for proper operation and lubricating same every six-months. Any hardware component may experience corrosion. However, if a customer maintains a vehicle per the recommended maintenance procedure, it is highly unlikely the latch will malfunction due to corrosion.

As indicated above, Ford has identified only one report alleging minor injuries due to a rear door opening while the vehicle was in motion. Ford interviewed the service manager, who confirmed that the latch functioned properly upon inspection and that no corrosion was identified, which calls into question the cause of those alleged minor injuries. The lack of injuries indicates that this condition does not present an unreasonable risk to motor vehicle safety. Additionally, Ford believes that if the door latches are maintained per the recommended procedures, the doors will latch as designed. In the event that the door is not closed properly, there are obvious indicators to the driver and passengers that the door is not on the primary latch prior to moving the vehicle. This allows the customer to remedy the concern before driving.

If you have any questions, please call me.

Sincerely,

  
James P. Vondale

Attachment

**FORD MOTOR COMPANY (FORD) RESPONSE TO PE04-033**

Ford's response to this Preliminary Evaluation 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 substantial effort to provide thorough and accurate information, and we would be pleased to meet with agency personnel to discuss any aspect of this Preliminary Evaluation.

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 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.

In a May 12, 2004 telephone conversation, Tom Cooper of the agency informed Ford personnel that the "alleged defect" was to be redefined to be "One or both of the rear door latches do not engage, resulting in the rear doors opening while the vehicle is in motion."

Answers to your specific questions are set forth below. 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 to provide responsive documents dated up to and including April 23, 2004, the date of your inquiry. Ford has searched business units and/or affiliates within the following offices for responsive documents: Environmental and Safety Engineering, Ford Customer Service Division, North American Product Development, Quality, Research, Global Core Engineering, Office of the General Counsel, Vehicle Operations, and Ford of Europe Product Development.

**Request 1**

State, by model and model year, the number of subject vehicles Ford has manufactured for sale or lease in the United States. Separately, for each subject vehicle manufactured to date by Ford, state the following:

- a. Vehicle identification number (VIN);
- b. Make;
- c. Model;
- d. Model Year;
- e. Date of manufacture;
- f. Date warranty coverage commenced; and
- g. The State in the United States where the vehicle was originally sold or leased (or delivered for sale or lease).

Provide the table in Microsoft Access 2000, or a compatible format, entitled "PRODUCTION DATA." See Enclosure I, Data Collection Disc, for a pre-formatted table which provides further details regarding this submission.

**Answer**

Ford records indicate that the approximate total number of 2000 model year Focus models with rear doors, including both manual and power door lock assemblies, sold in the United States (the 50 states and the District of Columbia) and its protectorates and territories (American Samoa, Guam, Northern Mariana Islands, Puerto Rico, and Virgin Islands) is 281,015.

The number of subject vehicles sold in the United States by model and model year is shown below:

Model	2000 MY
Focus LX - 4 Door Sedan	62,676
Focus SE - 4 Door Sedan	128,610
Focus SE - 4 Door Wagon	38,228
Focus ZTS - 4 Door Sedan	31,301
Total	281,015

The requested data for each subject vehicle is provided electronically in Appendix A (filename: 2004-06-11\_Appendix\_A-Production\_Data) on the enclosed CD.

**Request 2**

State the number of each of the following, received by Ford, or of which Ford are otherwise aware, which relate to, or may relate to, the alleged defect in the subject vehicles:

- 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. Property damage claims; and
- e. Third-party arbitration proceedings where Ford is or was a party to the arbitration; and
- f. Lawsuits, both pending and closed, in which Ford is or was a defendant or codefendant.

For subparts "a" through "d," state the total number of each item (e.g., consumer complaints, field reports, etc.) separately. Multiple incidents involving the same vehicle are to be counted separately. Multiple reports of the same incident are also to be counted separately (i.e., a consumer complaint and a field report involving the same incident in which a crash occurred are to be counted as a crash report, a field report and a consumer complaint).

In addition, for items "c" through "f," provide a summary description of the alleged problem and causal and contributing factors and Ford's assessment of the problem, with

a summary of the significant underlying facts and evidence. For items "e" and "f," identify the parties to the action, as well as the caption, court, docket number, and date on which the complaint or other document initiating the action was filed.

### 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: 2004-06-11\_Appendix\_B) on the enclosed CD.

The following categorizations were used in the review of reports located in each of these searches:

<u>Category</u>	<u>Allegation</u>
A1	Rear door opened while in motion, due to latch not engaged
B1	Rear door opened while in motion, unclear if latch related*
B2	Unspecified door opened while in motion*

\* We are providing electronic copies of these 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.

Ford understands the "alleged defect" to relate to rear door latches not engaging resulting in the rear door(s) opening while the vehicle is in motion. Ford is not providing allegations of rear door latches not engaging with no allegation that the vehicle was in motion.

Owner Reports: The search and review of the Ford Master Owner Relations Systems (MORS) database records, as described in Appendix B, identified 19 responsive (i.e., not ambiguous) owner reports.

Copies of the responsive owner and ambiguous owner reports are provided in the MORS III portion of the electronic database contained in Appendix C (file: 2004-06-11\_Appendix\_C) on the enclosed CD. The categorization of each report is identified in the "Category" field. When we were able to identify that responsive (i.e., not ambiguous) duplicate owner reports for an alleged incident were received, each of these duplicate reports is marked accordingly, and the group is counted as one report. In other cases, certain vehicles may have experienced more than one incident and have more than one report associated with their VINs. These reports would be counted separately.

Legal Contacts: Ford is providing in Appendix B a description of Legal Contacts and the activity that is responsible for this information, Litigation Prevention. 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, one file was located; a copy of that file is provided in Appendix D. It is included as a responsive MORS report.

**ICCD Information:** A search of the ICCD database as described in Appendix B located no reports that relate to the alleged defect.

**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. No responsive fleet reports were identified in that search.

**Field Reports:** The search and review of the Ford Common Quality Indicator System (CQIS) as described in Appendix B, identified no responsive or ambiguous field reports.

**Unified Database:** The Unified Database (UDB) was created to facilitate parts availability by tracking part sales and is not intended as a problem reporting system. However, because a small percentage of the records may contain verbatim comments that could potentially relate to the agency's inquiry, we are including these in response to Request 2. A search of UDB, as described in Appendix B, was conducted. No responsive or ambiguous UDB reports were located.

**VOQ Data:** This information request had an attachment that included 17 Vehicle Owner's Questionnaires (VOQs). Ford made inquiries of its MORS database for customer contacts, and its CQIS database for field reports regarding the vehicles identified on the VOQs. Ford notes that in some instances, where the VOQ does not contain the VIN, or the owner's last name and zip code, it is not possible to query the databases for owner and field reports specifically corresponding to the VOQs. Any reports located on a vehicle identified in the VOQs related to the alleged defect are included in the MORS and CQIS portions of the electronic database provided in Appendix C and have been identified by a "Y" in the "VOQ Dup" field. Ford notes that three of the 17 VOQs are included in the responsive MORS counts.

**Crash/Injury Incident Claims:** For purposes of identifying alleged accidents or injuries potentially related to the alleged defect, Ford has reviewed responsive (i.e., not ambiguous) owner and field reports, lawsuits and claims, and warranty claims. Based on a reasonable and diligent search, Ford located one owner report and a related "legal claim" regarding one incident. VIN 1FAFP3432YW [REDACTED] alleging an injury that may be related to the alleged defect. The owner report is included in the MORS portion of the electronic database provided in Appendix C. Lawsuit and claim information is provided as described below.

**Claims, Lawsuits, and Arbitrations:** For purposes of identifying incidents potentially related to the alleged defect, Ford has gathered 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.

Based on a reasonable and diligent search, Ford located no lawsuits, one claim (duplicative of a MORS report), and one consumer breach of warranty lawsuit, and no arbitrations that appear to relate to the alleged defect in the subject vehicles. We are providing the requested detailed information, where available, on the responsive claims in our Log of Lawsuits and Claims, as Appendix E1 (file: 2004-06-11\_Appendix\_E1) on the enclosed CD. Copies of complaints, first notices, or MORS reports relating to matters shown on the Log are provided in Appendix E2.

With regard to the identified lawsuit and claim, Ford has not undertaken to contact outside law firms to obtain additional documentation.

### Request 3

Separately, for each item (complaint, report, claim, notice, or matter) within the scope of your response to Request 2, state the following information:

- a. Ford's file number or other identifier used;
- b. The category of the item, as identified in Request No. 2 (i.e., consumer complaint, field report, etc.);
- c. Vehicle owner or fleet name (and fleet contact person), address, and telephone number;
- d. Vehicle's VIN;
- e. Vehicle's make, model and model year;
- f. Vehicle's mileage at time of incident;
- g. Incident date;
- h. Report or claim date;
- i. Whether a crash is alleged;
- j. Whether a fire is alleged;
- k. Whether property damage is alleged;
- l. Number of alleged injuries, if any; and
- m. Number of alleged fatalities, if any.

Provide this information in Microsoft Access 2000, or a compatible format, entitled "COMPLAINT DATA." See Enclosure 1, Data Collection Disc, for a preformatted table which provides further details regarding this submission.

### Answer

The requested information, to the extent available, is provided in Appendix E1 as discussed in response to Request 2.

### Request 4

Produce copies of all documents related to each item within the scope of Request 2 and 3. Organize the documents separately by category (i.e., consumer complaints, field reports, etc.) and describe the method Ford used for organizing the documents.

Answer

Copies of reports and claims identified in our response to Request 2 are provided electronically, as identified below.

Category	Method of Organization
Owner Reports	Appendix C (electronic)
Field Reports	None
Unified Database Reports	None
VOQ Data	Appendix C (electronic)
Legal Contacts	Appendix D
ICCD Reports	None
Non-privileged Lawsuit and Claim Information	Appendix E1 and E2

Request 5

State, by model and model year, a total count for all of the following categories of claims, collectively, that have been paid by Ford to date that relate to, or may relate to, the alleged defect in the subject vehicles: warranty claims; extended warranty claims; claims for good will services that were provided; field, zone, or similar adjustments and reimbursements; and warranty claims or repairs made in accordance with a procedure specified in a technical service bulletin or customer satisfaction campaign.

Separately, for each such claim, state the following reformation:

- a. Ford's claim number;
- b. Vehicle owner or fleet name (and fleet contact person) and telephone number;
- c. VIN;
- d. Repair date;
- e. Vehicle mileage at time of repair;
- f. Repairing dealer's or facility's name, telephone number, city and state or ZIP code;
- g. Labor operation number;
- h. Problem code;
- i. Replacement part number(s) and description(s);
- j. Concern stated by customer; and
- k. Comment, if any, by dealer/technician relating to claim and/or repair.

Provide this information in Microsoft Access 2000, or a compatible format, entitled "WARRANTY DATA." See Enclosure 1, Data Collection Disc, for a pre-formatted table which provides further details regarding this submission.

Answer

In responding to this information request, Ford electronically searched its Analytical Warranty System (AWS) for all claims meeting the criteria described in Appendix B. The resulting claims were then reviewed individually for allegations that may relate to the alleged defect. This search and review of the Ford AWS database records identified 28 non-duplicative warranty claims that



may relate to the alleged defect. Ford notes that one responsive AWS claim is duplicative of one responsive owner report and is not included in this count.

Electronic copies of these claims and ambiguous claims are provided in the AWS portion of the electronic database contained in Appendix C. The categorization of each report is identified in the "Category" field. When we were able to identify that duplicate claims for an alleged incident were received, each of these duplicate claims is marked accordingly and the group is counted as one report. In other cases, certain vehicles may have experienced more than one incident and have more than one claim associated with their VINs. These claims would be counted separately.

The requested customer concern codes and the warranty condition codes are provided in Appendix B. Requests for "goodwill, field, or zone adjustments" received by Ford that relate to the alleged defect in the subject vehicles that were not honored, if any, would be included in the MORS reports identified above in response to Request 2. Requests for goodwill that were honored, if any, are contained in the warranty data provided.

#### Request 6

Describe in detail the search criteria used by Ford to identify the claims identified in response to Request 5, including the labor operations, problem codes, part numbers and any other pertinent parameters used. State by option (e.g., engine, transmission, etc), make and model year, the terms of the new vehicle warranty coverage offered by Ford on the subject vehicles (i.e., the number of months and mileage for which coverage is provided and the vehicle systems that are covered). Describe any extended warranty coverage option(s) that Ford offered for the subject vehicles and state by option, model, and model year, the number of vehicles that are covered under each such extended warranty.

#### Answer

The search criteria used by Ford to identify claims in response to Request 5 are listed in detail in Appendix B. For 2000 model year Focus vehicles, the New Vehicle Limited Warranty, Bumper to Bumper Coverage begins at the warranty start date and lasts for three years or 39,000 miles, whichever occurs first. Optional Extended Service Plans (ESPs) are available to cover various vehicle systems, time in service and mileage increments. The details of the various plans are provided electronically in Appendix J (filename: 2004-06-11\_Appendix\_J) on the enclosed CD. A review of the ESPs offered for 2000 model year Focus vehicles indicates the subject components are covered under the Premium Care Plan. As of the date of the inquiry, 22,032 Premium Care policies have been purchased on 2000 model year Focus vehicles equipped with rear doors.

#### Request 7

Produce copies of all service, warranty, and other documents that relate to, or may relate to, the alleged defect in the subject vehicles, that Ford has issued to may dealers, regional or zone offices, field offices, fleet purchasers, or other entities. This includes, but is not limited to, bulletins, advisories, informational documents, training documents, or other documents or communications, with the exception of standard shop manuals. Also include the latest draft copy of any communication that Ford is planning to issue within the next 120 days.

**Answer**

For purposes of identifying communications to dealers, zone offices, or field offices pertaining, that at least in part, relate to the alleged defect in the subject vehicles, Ford has reviewed the following FCSD databases and files: The On-Line Automotive Service Information System (OASIS) containing Technical Service Bulletins (TSBs) and Special Service Messages (SSMs); Internal Service Messages (ISMs) contained in the CQIS; and Field Review Committee (FRC) files. We assume this request does not seek information related to electronic communications between Ford and its dealers regarding the order, delivery, or payment for replacement parts, so we have not included these kinds of information in our answer.

A description of Ford's OASIS messages, Internal Service Messages, and the Field Review Committee files and the search criteria used are provided in Appendix B.

**OASIS Messages:** Ford has identified no SSMs and no TSBs that may relate to the alleged defect in the subject vehicles. Two SSMs that are ambiguous and, in our judgment, do not relate to the alleged defect were also located. They are being provided in Appendix F for your information due to the broad scope of the request.

**Internal Service Messages:** Ford has identified no ISMs that may relate to the alleged defect in the subject vehicles.

**Field Review Committee:** Ford has identified no field service action communications that may relate to the alleged defect in the subject vehicles.

**Request 8**

Describe all assessments, analyses, tests, test results, studies, surveys, simulations, investigations, inquiries and/or evaluations (collectively, "actions") that relate to, or may relate to, the alleged defect in the subject vehicles that have been conducted, are being conducted, are planned, or are being planned by, or for, Ford. For each such action, provide the following information:

- a. Action title or identifier,
- b. The actual or planned start date;
- c. The actual or expected end date;
- d. Brief summary of the subject and objective of the action;
- e. Engineering group(s)/supplier(s) responsible for designing and for conducting the action; and
- f. A brief summary of the findings and/or conclusions resulting from the action.

For each action identified, provide copies of all documents related to the action, regardless of whether the documents are in interim, draft, or final form. Organize the documents chronologically by action.

**Answer**

Ford has conducted a diligent search for the information and documents requested, and for other documents that may assist in the agency's analysis of this matter.

Ford wishes to advise the agency, that due to the uncommon format of certain electronic documents, Ford is in the process of converting such documents to a commonly recognized file

format. These documents will be provided to the agency under separate cover no later than June 24, 2004, as Appendix H1.

Further, Ford will voluntarily submit additional documents that 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 under separate cover with a request for confidentiality to the agency's Office of Chief Counsel in Appendix H2.

#### Request 9

Describe all modifications or changes made by, or on behalf of, Ford in the design, material composition, manufacture, quality control, supply, or installation of the subject component, from the start of production to date, which relate to, or may relate to, the alleged defect in the subject vehicles. For each such modification or change, provide the following information:

- a. The date or approximate date on which the modification or change was incorporated into vehicle production;
- b. A detailed description of the modification or change;
- c. The reason(s) for the modification or change;
- d. The part numbers (service and engineering) of the original component;
- e. The part number (service and engineering) of the modified component;
- f. Whether the original unmodified component was withdrawn from production and/or sale, and if so, when;
- g. When the modified component was made available as a service component; and
- h. Whether the modified component can be interchanged with earlier production components.

Also, provide the above information for any modification or change that Ford is aware of which may be incorporated into vehicle production within the next 120 days.

#### ANSWER

A table of the requested changes is provided electronically as Appendix G (file: 2004-06-11\_Appendix\_G) on the enclosed CD.

#### Request 10

Produce one of each of the following:

- a. Exemplar samples of each design version of the subject component (only for left-side rear passenger door, one sample for manual and one for power lock of each design version);
- b. Any kits that have been released, or developed, by Ford for use in service repairs to the subject component/assembly which relate, or may relate, to the alleged defect in the subject vehicles.

**Answer**

One tagged sample of the original passenger side rear power door latch is included in this submission. No service kits have been developed for repairs to the rear door latch assemblies. A tagged current service part has also been included in this submission. We are unable to locate a sample of the original manual rear door latch.

**Request 11**

State the number of each of the following that Ford has sold that may be used in the subject vehicles by component name, part number (both service and engineering/production), model and model year of the vehicle in which it is used and month/year of sale (including the cut-off date for sales, if applicable):

- a. Subject component;
- b. Similar or substantially similar components; and
- c. Any kits that have been released, or developed, by Ford for use in service repairs to the subject component/assembly.

For each component part number, provide the supplier's name, address, and appropriate point of contact (name, title, and telephone number)

**Answer**

As the agency is aware, Ford service parts are sold in the U.S. to authorized Ford and Lincoln-Mercury dealers. Ford has no means by which to determine how many of the parts were actually installed on vehicles, the vehicle model on which a particular part was installed, or the reason that the installation may have been made. In addition, service part sales on low volume parts may include parts supplied for Canadian dealers.

Ford is providing in electronic form in Appendix J (file: 2004-06-11\_Appendix\_J) on the enclosed CD the total number of Ford service replacement Focus rear door latch assemblies by part number (both service and engineering) and calendar month and year of sale where available. A list of models and model years for which these parts are released and supplier names and contacts are also provided in this appendix.

**Request 12**

Identify by make, model and model year, any other vehicles of which Ford is aware that contain the subject component, whether installed in production or in service, and state the applicable dates of production or service usage.

**Answer**

No other Ford vehicles utilize the same rear door latch as the 2000 model year Focus.

**Request 13**

Furnish Ford's assessment of the alleged defect in the subject vehicle, including:

- a. The causal or contributory factor(s);
- b. The failure mechanism(s);

- c. The failure mode(s);
- d. The effect(s) of the failure on the subject components and to mating components/systems;
- e. The risk to motor vehicle safety that it poses;
- f. What warnings, if any, the operator and the other persons both inside and outside the vehicle would have that the alleged defect was occurring or subject component was malfunctioning;
- g. A description of the analysis process used to assess "a" through "f," and;
- h. The reports generated as a result of this inquiry.

### **Answer**

As set forth above, Ford's response to this information request provides information and reports concerning alleged door openings due to door latch engagement while a vehicle is in motion. In addition, and as discussed previously, Ford's submission also includes ambiguous reports of alleged door openings when the vehicle is in motion where the cause could not be specifically determined or where the location of the purported open door could not be determined. Alleged door openings in a stationary vehicle are not included in Ford's response.

Ford's review of warranty claims, field reports, customer contacts, unified database, and lawsuits and claims identified 47 non-duplicative reports alleging that a rear door opened due to latch function while a vehicle was in motion. Ford is unable to state how many of the allegations involve complete door opening. Ford products sold in North America utilize latches with two levels of engagement: primary and secondary. In prior investigations concerning door latching, Ford contacted customers who had alleged that a door opened while their vehicle was in motion. In many cases, Ford discovered that the door was not actually opened but secured in the secondary latch position. In the unlikely event that all 47 reports are responsive, the number of responsive non-duplicative reports alleging rear door opening due to insufficient latch engagement results in an incident rate of only 0.160 R/1000. Even if the agency includes the ambiguous reports of alleged door openings, the incident rate rises to only 0.226 R/1000.

Ford's investigation reveals just one incident (MORS Report #1300052623 - Rosunda R. Rivers) where the customer alleges a rear door opened resulting in injuries to a passenger sitting in the second row. The injuries alleged in this event are minor: "bruising on his left side and wrist injury." Ford has not spoken with this customer but presumes that the occupant was not wearing a safety belt. The report contains no mention of restraint usage. As part of this investigation, Ford contacted the service manager (Charles Arnold) at the servicing dealership in North Carolina. Mr. Arnold stated that he specifically remembered the repair, which occurred on September 19, 2003. He recalled the customer because she alleged the rear driver side door opened while driving and that a person fell out of the vehicle. Mr. Arnold personally inspected the vehicle and actuated the latch to verify the function of the mechanism. At the time of the inspection, Mr. Arnold found no corrosion and noted the door latch was operating properly. Mr. Arnold opined that the customer "didn't like the vehicle." While Mr. Arnold determined that the latch was functioning properly, he explained he wanted to appease his customer and therefore installed a new door latch in the vehicle. (Ford also notes that vehicles in North Carolina do not typically experience corrosion with three years of service.) Other than this single report, no other allegation of injuries due to door opening were located.

Ford believes several obvious indicators would alert the customer to a latch concern prior to a door opening while the vehicle is in motion. For example, 2000 model year Ford Focus vehicles are equipped with a door ajar warning system for each door and the rear hatch. The door ajar switch, which is located on the striker, monitors the position of the door and, when the ignition is

In the "on" position, will illuminate the door ajar warning light on the instrument panel and overhead dome light when the door is in any position other than the primary latched position. Additionally, if a door is not properly latched or fully closed, a driver would notice an increase in wind noise, an increase in road noise, and/or a "chucking" or "clunking" noise emanating from the rear door as the latch contacted the striker on rough roads. Any of these indicators would alert a driver and a passenger to an "open door" condition.

In the course of its investigation, Ford noted three VOQs (ODI #: 10045328, 10033629, 8014180) that allege door latch corrosion as a possible cause for the door latch engagement concern. In the 2000 Model Year Scheduled Maintenance Guide, Ford recommends checking all hinges, latches, and outside locks for proper operation and lubricating same every six-months. Any hardware component may experience corrosion. However, if a customer maintains a vehicle per the recommended maintenance procedure, it is highly unlikely the latch will malfunction due to corrosion.

Ford does not believe that the rear door latch on 2000 model Ford Focus vehicles contains a safety related defect. As in prior investigations related to door latching, Ford believes that many of the allegations of doors opening in motion may be related to a door on the secondary latch. In prior investigations, the agency concluded that doors engaged in the secondary latch position while the vehicle is in motion are not open, and therefore, do not constitute an unreasonable risk to motor vehicle safety.

In the instant investigation, the customers observations that a "door opened" are typically based on the obvious indications that a door is open, such as the illuminated door ajar light and dome light or noise, such as the increase in wind or road noise or the clunking of the door against the striker that occurs when a door is not fully latched. The illuminated lights and the noises alert a customer that a door is not fully closed (not in the primary latch position) and are present when the door is securely latched in the secondary latch position. Accordingly, the warning light and overt indicators alert the customer to a potential concern even though the door is actually securely latched in the secondary position.

There are no alleged injuries related to this condition except for those alleged in the Rivers' report discussed above. Ford's interview of the service manager confirms that the latch functioned properly upon inspection and that no corrosion was identified, which calls into question the cause of those alleged minor injuries. The lack of injuries indicates that this condition does not present an unreasonable risk to motor vehicle safety. Additionally, Ford believes that if the door latches are maintained per the recommended procedures, the doors will latch as designed. In the event that the door is not closed properly, there are obvious indicators to the driver and passengers that the door is on the secondary latch prior to moving the vehicle. This allows the customer to remedy the concern before driving.

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