

Ford Motor Company

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

January 28, 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

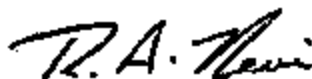
Dear Ms. DeMeter:

Subject: PE04-078:NVS-214bby

The Ford Motor Company response to the agency's December 3, 2004 letter concerning reports of alleged underhood fires on 1999-2001 model year Ford F-150 and Expedition vehicles is attached.

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

Sincerely,



James P. Vondale

Attachment



FORD MOTOR COMPANY (FORD) RESPONSE TO PE04-078

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 December 7, 2004 telephone conversation, Mr. Bruce York of the agency informed Ford personnel of the following: The investigation involves 1999 through 2001 model year F-150 and Expedition vehicles and also includes a peer group of 1997, 1998, 2002, and 2003 model year Ford F-150 and Expedition vehicles. Request 2 was clarified to exclude reports involving an accident prior to an alleged fire in the subject vehicle, and does not seek consumer cases (Lemon Law) as a source of reports of the alleged defects in the subject vehicles. Request 3 was clarified to remove subpart o, because Ford consumer complaints do not typically contain the requested component and system codes, and to request that Ford use categories similar to those used in Ford's response to EA02-025 as the manner to respond to subparts p and u. Request 5 was clarified as seeking information only on non-crash underhood fire allegations and to exclude consumer cases (Lemon Law) as a source of alleged defects in the subject and peer vehicles. Request 8 was clarified to exclude subpart j, because Ford warranty claims do not include a data field recording allegations of smoke, melting, or fire. Request 12 was clarified to exclude information previously submitted in EA02-025. Request 15 was clarified as seeking information only on the subject part and its replacement part, which was introduced in the 2003 model year.

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 December 3, 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, Marketing and Sales Operations, Quality, Research, Global Core Engineering, Office of the General Counsel, Vehicle Operations, and North American Truck 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 state the following:

- a. Vehicle identification number (VIN);
- b. Make;
- c. Model;
- d. Model Year;
- e. Date of manufacture;
- f. Date warranty coverage commenced;
- g. The plant where the vehicle was produced;
- h. If Anti-lock Brakes were installed as original equipment;
- i. If Traction Control was installed as original equipment;
- j. If Cruise Control installed as original equipment; and,
- k. 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 1, Data Collection Disc, for a pre-formatted table designed for this submission.

Answer

Ford records indicate that the approximate total number of subject vehicles 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 2,190,918. Ford records also indicate that traction control was not available on 1999 – 2001 model year F-150 and Expedition vehicles. Speed control and four-wheel anti-lock brake system (ABS) brakes were standard equipment on 1999 – 2001 model year Expedition vehicles, while 1999 – 2001 model year F-150 vehicles featured two-wheel ABS brakes as standard equipment and offered speed control and four-wheel ABS brakes as optional equipment.

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

	Model Year			Total
	1999	2000	2001	
Total F-150 Production	482,140	456,040	589,134	1,537,314
<i>F-150 With Speed Control</i>	<i>399,814</i>	<i>366,079</i>	<i>522,128</i>	<i>1,287,021</i>
Total Expedition Production	240,680	237,908	175,016	653,604
Total Subject Vehicle Production	732,820	693,948	764,150	2,190,918

The requested data for each subject vehicle is provided electronically in Appendix A (filename: 2005-01-28_Appendix_A) on the enclosed CD.

Request 2

State the number of each of the following, received by Ford, or of which Ford is otherwise aware, which relate to engine compartment fires 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. Third-party arbitration proceedings where Ford is or was a party to the arbitration; and,
- e. Lawsuits, both pending and closed, in which Ford is or was a defendant or codefendant.

For subparts "a" through "e," state the total number of each item (e.g., consumer complaints, field reports, etc.) separately for each model and model year. 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 "e," 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 "d" and "e," 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: 2005-01-28_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	Alleged underhood fire, non-crash, key-off, alleged speed control deactivation switch failure
A2	Alleged underhood fire, non-crash, key-on, alleged speed control deactivation switch failure
A3	Alleged underhood fire, non-crash, unknown key position, alleged speed

	control deactivation switch failure
A4	Alleged smoke/melt - alleged speed control deactivation switch failure*
B1	Alleged smoke/melt - ambiguous or unidentified source*
F1	Alleged underhood fire, non-crash, key-off, no alleged speed control deactivation switch failure
F2	Alleged underhood fire, non-crash, key-on, no alleged speed control deactivation switch failure
F3	Alleged underhood fire, non-crash, unknown key position, no alleged speed control deactivation switch failure
FB1	Alleged underhood fire, non-crash, key-off, ambiguous as to alleged speed control deactivation switch failure
FB2	Alleged underhood fire, non-crash, key-on, ambiguous as to alleged speed control deactivation switch failure
FB3	Alleged underhood fire, non-crash, ambiguous key position, ambiguous as to alleged speed control deactivation switch failure
FB4	Ambiguous alleged fire source, non-crash; ambiguous as to alleged fire source, ambiguous as to alleged crash*

*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.

Owner Reports: Ford searched its Ford Master Owner Relations Systems (MORS) database records, as described in Appendix B. The resulting records were then reviewed and categorized in accordance with the categories described above. The categorized records can be found in Appendix C1 for Expedition vehicles and Appendix C2 for F-150 vehicles (files: 2005-01-28_Appendix_C1 and 2005-01-28_Appendix_C2) on the enclosed CD. The categorization of each report is identified in the "Category" field. The requested total of each item (e.g., consumer complaints, field reports, etc.) separately for each model and model year is provided in Appendices C1 and C2.

Copies of these owner reports are provided in the MORS II and MORS III portions of the electronic database contained in Appendices C1 and C2. 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. In other cases, certain vehicles may have experienced more than one incident and have more than one report associated with their VINs. These reports are listed separately. In addition, Ford identified six category A1, one category F3, and two category FB1 MORS III reports that are duplicative of nine VOQ reports for 2000 model year F-150 vehicles; these reports are provided in Appendix C.

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 indicate that they are Legal Contacts, Ford has gathered the

related files from the Litigation Prevention section. Based on this search, 19 files were located and are provided in Appendix D.

ICCD Information: A search of the ICCD database as described in Appendix B located no reports that may relate to the alleged defect, and no reports that are ambiguous as to whether they 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 fleet reports were identified.

Field Reports: The number of field reports identified in a search and review of the Ford Common Quality Indicator System (CQIS) records, as described in Appendix B, is provided by model, model year and category in Appendices C1 and C2 for Expedition and F-150 vehicles respectively.

CQIS

Copies of these field reports are provided in the CQIS portion of the electronic database contained in Appendices C1 and C2. The categorization of each report is identified in the "Category" field. When we were able to identify that responsive (i.e., not ambiguous) duplicate field reports for an alleged incident were received, each of these duplicate reports is marked accordingly. In other cases, certain vehicles may have experienced more than one incident and have more than one report associated with their VINs. In addition, Ford identified one category FB1 (1999 model year F-150), one category A2 (2001 model year F-150), and one category F1 (2000 model year Expedition) CQIS report are duplicative of owner reports and are provided in Appendices C1 and C2.

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. Accordingly, a search of UDB, as described in Appendix B, was conducted, and the reports were marked in accordance with the categories described above. Copies of potentially relevant reports and ambiguous reports are provided in the UDB portion of the electronic database contained in Appendices C1 and C2 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 UDB reports for an alleged incident were received, each of these duplicate reports is marked accordingly. In other cases, certain vehicles may have experienced more than one incident and have more than one report associated with their VINs. The number of UDB reports identified in a search and review of the UDB database records, as described in Appendix B, is provided by model, model year and category in Appendices C1 and C2 for Expedition and F-150 vehicles respectively.

VOQ Data: This information request had an attachment that included 36 Vehicle Owner's Questionnaires (VOQs), three of which, were duplicative. Ford made inquiries of its MORS database for customer contacts, and its CQIS database for field reports regarding the vehicles identified in 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 C2 and have been identified by a "Y" in the "VOQ Dup" field.

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 2000 model year F-150 owner (MORS III) report [VIN: 1FTZX172XYN] alleging "On Sunday 1:30 in the morning his brother was driving down the road around 40-45MPH, the vehicle caught fire under the hood and the air bag came out" due to an alleged unidentified electrical problem. The driver alleged burns from the airbag deployment, but reported no accident prior to the deployment. After much difficulty in obtaining access to the vehicle, an inspection clearly showed impact damage, which Ford believes was the cause of the alleged fire and airbag deployment. The vehicle was only 8 months old at the time of the incident.

Ford has only recently received a suit on a 2000 model year F-150 [VIN: 1FTRX17L7YN] alleging an underhood fire while parked. The customer alleges unspecified injuries from the incident.

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 against the Company.

Based on a reasonable and diligent search, Ford located 20 lawsuits, 97 claims or consumer breach of warranty lawsuits, and no arbitrations that appear to relate to the alleged defect in the subject vehicles. There are also 9 claims and 44 lawsuits that are duplicates of responsive owner reports and are not included in the count above. Ford has also located other lawsuits, claims or consumer breach of warranty lawsuits each of which is ambiguous as to whether it meets the alleged defect criteria. We have included these lawsuits and claims as "non-specific allegations" for your review because of the broad scope of the request. Based on our engineering judgment, the information in these lawsuits and claims is insufficient to support a determination that they pertain to the alleged defect. We are providing the requested detailed information, where available, on the responsive and ambiguous lawsuits and claims in our Log of Lawsuits and Claims, as Appendix E (file: 2005-01-28_Appendix_E) on the enclosed CD. To the extent available, copies of complaints, first notices, or MORS reports relating to matters shown on the Log are provided in Appendix F. With regard to these lawsuits and claims, 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 No. 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. Incident state;
- i. Report or claim date;
- j. Whether a crash is alleged;
- k. Whether a fire is alleged;
- l. Whether property damage is alleged;
- m. Number of alleged injuries, if any;
- n. Number of alleged fatalities, if any;
- o. Ford component and system codes;
- p. Whether the item is related to the alleged defect;
- q. The alleged quadrant of the engine compartment where the fire started. (front left, front right, rear left, rear right, unknown)
- r. Whether the incident occurred with the engine "OFF" or the engine "ON;"
- s. Whether or not Ford received a subrogation claim regarding the incident (Y/N);
- t. Whether a fire investigation was performed by any party, that Ford is aware of, to determine the origin and cause (if so, please provide a copy of the report);
- u. Alleged cause of the fire,
- v. Complaint summary;
- w. Consumer comments; and,
- x. Ford's assessment of the allegation;

Provide this information in Microsoft Access 2000, or a compatible format, entitled "REQUEST NUMBER TWO DATA." See Enclosure 1, Data Collection Disc, for a preformatted table designed for this submission.

Answer

Ford is providing owner and field reports in the electronic database contained in Appendices C1 and C2 on the enclosed CD in response to Request 2. To the extent information sought in Request 3 is available for owner and field reports, it is provided in the database. As stated in the response to Request 2, Ford is providing the requested detailed information, where available, on the responsive and ambiguous lawsuits and claims in our Log of Lawsuits and Claims, as Appendix E. As discussed with the agency, the category assigned to each owner and field report in the database and each incident in the Log of Lawsuits and Claims will be used to respond to subparts p, r, and u.

Request 4

Produce electronic copies of all documents related to each item within the scope of Request No. 2. Organize the documents separately by category (i.e., consumer complaints, field reports, etc.) and describe the method Ford used for organizing the documents.

Answer

Ford is providing electronic copies of responsive, as well as ambiguous, owner and field reports in the database contained in Appendices C1 and C2 on the enclosed CD in response to Request 2. To the extent available, copies of complaints, first notices, or MORS reports relating to matters shown on the Log of Lawsuits and Claims are provided in Appendix F.

Request 5

State the number of each of the following, received by Ford, or of which Ford is otherwise aware, which relate to fires in the subject and peer vehicles:

- a. Consumer complaints, including those from fleet operators;
- b. Field reports, including dealer field reports;
- c. Third-party arbitration proceedings where Ford is or was a party to the arbitration; and,
- d. 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 for each model and model year. 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).

Answer

For purposes of identifying reports alleging fires in the subject and peer vehicles, 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 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	Alleged underhood fire, non-crash, key-off, alleged speed control deactivation switch failure
A2	Alleged underhood fire, non-crash, key-on, alleged speed control deactivation switch failure
A3	Alleged underhood fire, non-crash, unknown key position, alleged speed control deactivation switch failure
A4	Alleged smoke/melt - alleged speed control deactivation switch failure*
B1	Alleged smoke/melt - ambiguous or unidentified source*
F1	Alleged underhood fire, non-crash, key-off, no alleged speed control deactivation switch failure
F2	Alleged underhood fire, non-crash, key-on, no alleged speed control deactivation switch failure

- F3 Alleged underhood fire, non-crash, unknown key position, no alleged speed control deactivation switch failure
- FB1 Alleged underhood fire, non-crash, key-off, ambiguous as to alleged speed control deactivation switch failure
- FB2 Alleged underhood fire, non-crash, key-on, ambiguous as to alleged speed control deactivation switch failure
- FB3 Alleged underhood fire, non-crash, ambiguous key position, ambiguous as to alleged speed control deactivation switch failure
- FB4 Ambiguous alleged fire source, non-crash; ambiguous as to alleged fire source, ambiguous as to alleged crash*

*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.

Owner Reports: Ford searched its Ford Master Owner Relations Systems (MORS) database records, as described in Appendix B. The resulting records were then reviewed and categorized in accordance with the categories described above. The categorized records can be found in Appendices C1 and C2. The categorization of each report is identified in the "Category" field. The requested total of each item (e.g., consumer complaints, field reports, etc.) separately for each model and model year is provided in Appendices C1 and C2.

Copies of these owner reports are provided in the MORS II and MORS III portions of the electronic database contained in Appendices C1 and C2. 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. In other cases, certain vehicles may have experienced more than one incident and have more than one report associated with their VINs. These reports listed separately. In addition, Ford identified six category A1, one category F3, and two category FB1 MORS III reports that are duplicative of nine VOQ reports for 2000 model year F-150 vehicles; these reports are provided in Appendix C2. The number of owner reports identified in a search and review of the MORS II and MORS III database records, as described in Appendix B, is provided by model, model year and category in Appendices C1 and C2 for Expedition and F-150 vehicles respectively.

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 indicate that they are Legal Contacts, Ford has gathered the related files from the Litigation Prevention section. Based on this search, 34 files were located and are provided in Appendix D.

ICCD Information: A search of the ICCD database as described in Appendix B located no reports that may relate to the alleged defect, and no reports that are ambiguous as to whether they 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 fleet reports were identified.

Field Reports: The number of field reports identified in a search and review of the Ford Common Quality Indicator System (CQIS) records, as described in Appendix B, is provided by model, model year and category in Appendices C1 and C2 for Expedition and F-150 vehicles respectively.

CQIS

Copies of these field reports are provided in the CQIS portion of the electronic database contained in Appendices C1 and C2. The categorization of each report is identified in the "Category" field. When we were able to identify that responsive (i.e., not ambiguous) duplicate field reports for an alleged incident were received, each of these duplicate reports is marked accordingly. In other cases, certain vehicles may have experienced more than one incident and have more than one report associated with their VINs. In addition, Ford identified two category FB1 (1997 & 1999 model year), two category F3 (2002 & 2003 model year), one category F2 (2003 model year), and one category A2 (2001 model year) CQIS reports that are duplicative of F-150 owner reports. One category F1 (2000 model year) and one category F3 (1997 model year) CQIS report are duplicative of Expedition owner reports. The duplicative reports are provided in Appendices C1 and C2.

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 5. Accordingly, a search of UDB, as described in Appendix B, was conducted, and the reports were marked in accordance with the categories described above. Copies of potentially relevant reports and ambiguous reports are provided in the UDB portion of the electronic database contained in Appendices C1 and C2 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 UDB reports for an alleged incident were received, each of these duplicate reports is marked accordingly. In other cases, certain vehicles may have experienced more than one incident and have more than one report associated with their VINs. In addition, one category FB3 (2002 model year) and two category A3 (1997 model year) CQIS reports are duplicative of F-150 owner reports. The duplicative reports are provided in Appendix C2. The number of UDB reports identified in a search and review of the UDB database records, as described in Appendix B, is provided by model, model year and category in Appendices C1 and C2 for Expedition and F-150 vehicles respectively.

VOQ Data: This information request had an attachment that included 36 Vehicle Owner's Questionnaires (VOQs), three of which, were duplicative. Ford made inquiries of its MORS database for customer contacts, and its CQIS database for field reports regarding the vehicles identified in 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 C2 and have been identified by a "Y" in the "VOQ Dup" field.

Claims, Lawsuits, and Arbitrations: For purposes of identifying incidents potentially related to alleged fires in the subject and peer vehicles, 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 against the Company.

Based on a reasonable and diligent search, Ford located 46 lawsuits, 163 claims or consumer breach of warranty lawsuits, and no arbitrations that appear to relate to the alleged defect in the subject and peer vehicles. There are also 32 claims and 46 lawsuits that are duplicates of responsive owner reports and are not included in the count above. Ford has also located other lawsuits, claims or consumer breach of warranty lawsuits, each of which is ambiguous as to whether it meets the alleged defect criteria. We have included these lawsuits and claims as "non-specific allegations" for your review because of the broad scope of the request. Based on our engineering judgment, the information in these lawsuits and claims is insufficient to support a determination that they pertain to the alleged defect. We are providing the requested detailed information, where available, on the responsive and ambiguous lawsuits and claims in our Log of Lawsuits and Claims, as Appendix E on the enclosed CD. To the extent available, copies of complaints, first notices, or MORS reports relating to matters shown on the Log are provided in Appendix F. With regard to these lawsuits and claims, Ford has not undertaken to contact outside law firms to obtain additional documentation.

Request 6

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 where the subject component was replaced 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 information:

- 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. Causal part (if identified);
- j. Whether smoke, melting or fire is identified (if fields exist in warranty data);
- k. Replacement part number(s) and description(s);
- l. Concern stated by customer; and
- m. Comments, 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 designed for 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. All claims coded for the selected part number were included in this search regardless of labor operation or problem codes. The number of warranty claims involving replacement of the subject component in the subject vehicles that were identified in a search of the Ford AWS database records is provided in Appendix G (file: 2005-01-28_Appendix_G) on the enclosed CD.

In an additional search, Ford electronically searched its Analytical Warranty System (AWS) for all claims meeting the criteria described in Appendix B. All claims coded for the selected part number were included in this search regardless of labor operation or problem codes. The resulting claims were then reviewed individually for allegations that may relate to the alleged defect.

As discussed with the agency, Ford warranty claims do not include a data field recording allegations of smoke, melting, or fire that can be used to respond to subpart j. The category definition described in our response to Request 2 have been used to respond to subpart j.

Electronic copies of these claims are provided in the AWS portion of the electronic database contained in Appendices C1 and C2. 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. In other cases, certain vehicles may have experienced more than one incident and have more than one claim associated with their VINs. The number of AWS claims identified in a search and review of the AWS database records, as described in Appendix B, is provided by model, model year, and category in Appendices C1 and C2 for Expedition and F-150 vehicles, respectively.

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 to date that relate to the alleged defect in the subject vehicles that were not honored, if any, would be indicated in the MORS reports identified above in response to Request 5. Requests for goodwill that were honored, if any, are contained in the warranty data provided.

Request 7

Describe in detail the search criteria used by Ford to identify the claims identified in response to Request No. 6, including the labor operations, problem codes, part numbers and any other pertinent parameters used. Provide a list of all labor operations, labor operation descriptions, problem codes, and problem code descriptions applicable to the alleged defect in the subject vehicles. State, by 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) related to the alleged defect 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 criteria used for searching Ford's Analytical Warranty System (AWS) are described in Appendix B. All claims coded under the selected part number was included in this search regardless of labor operation or problem codes.

The standard new vehicle warranty coverage for 1999-2001 model year Ford vehicles is three years or 36,000 miles, whichever occurs first. A list of Extended Service Plans (ESP) that cover the subject component is provided in Appendix H (file: 2005-01-28_Appendix_H) on the enclosed CD along with time-in-service and mileage coverage by plan. This appendix also includes the count of subject vehicles that are covered by each ESP.

Request 8

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 where the subject component was replaced in peer 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. Provide a sub total count of these claims that list the subject component as the causal part for the claim and a sub total count of the different problem codes attributed to these claims.

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. All claims coded for the selected part number were included in this search regardless of labor operation or problem codes. This search of the Ford AWS database records identified the following number of warranty claims involving the replacement of the subject component, as well as when the technician identified the subject component as the "causal part" for the customer's concern. Ford is reporting the technician's identification of "causal part", but did not attempt to validate the technician's rationale for the identification. The number of warranty claims involving replacement of the subject component in the subject and peer vehicles that were identified a search of the Ford AWS database records is provided in Appendix G (file: 2005-01-28_Appendix_G) on the enclosed CD.

Request 9

Produce electronic 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 any 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 manufacturer's short name is planning to issue within the next 120 days.

Answer

For purposes of identifying communications to dealers, zone office, or field offices pertaining, at least in part, 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 QASIS messages, Internal Service Messages, and the Field Review Committee files, and the search criteria used, are provided in Appendix B.

QASIS Messages: Ford has identified no TSBs that may relate to the alleged defect in the subject vehicles.

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 10

Describe the Circuit that contains the SCDS in the subject vehicles. Include in this description the other components that are powered on this circuit.

Answer

Documents that describe the circuit that contains the subject component in the subject vehicles are provided in Appendix I.

Request 11

Identify all of the components in the engine compartment that are powered when the key is in the off position on the subject vehicles. Identify the quadrant in the engine compartment where the component is located (front left, front right, rear left, or rear right).

Answer

A document identifying all of the components in the engine compartment that are powered when the key is in the off position on the subject vehicles is provided in Appendix J.

Request 12

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 or any of the subject components installed 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 electronic 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

As the agency is aware, we have recently initiated Safety Recall 05S28 which includes 2000 model year Ford F-150, Ford Expedition and Lincoln Navigator vehicles, as well as 2001 model year F-150 Supercrew vehicles built through August 7, 2000. We have done so because we identified an increasing number of fires allegedly related to the speed control deactivation switch on these vehicles. We will continue to cooperate with this investigation and we will keep the agency informed of our actions.

Ford is in the process of collecting and examining speed control deactivation switches from subject and peer vehicles, as well as examining some of the vehicles themselves. In addition, Ford is also researching other aspects of the subject vehicles and subject component such as: changes in vehicle assembly processes in each vehicle assembly plant, the assembly processes of the tier one and tier two suppliers of the subject component, underhood temperature data, and design changes to the subject component and surrounding components. Engineering comparisons between the subject vehicles and other Ford vehicles are also planned. No examinations of switches or vehicles has been completed as of the date of this response. Due to the complexities of determining the root cause of underhood fires, the expected end date of subject vehicle and switch analysis is not known at this time. However, Ford intends to keep the agency informed of our progress as the examination and analysis process continues.

Further, 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.

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 K.

Documents for which Ford is not requesting confidentiality are included in Appendix L.

Ford has divided documents responsive to request 12 in to four groups: 1) Field Data, 2) Surveys, 3) Correspondence, and 4) Miscellaneous. The locations of these documents are noted in the table below:

Category	Location of Non-Confidential Material
Field Data: Copies	Appendix L1
Filed Data: Electronic	Appendix L2 (2005-01-28_Appendix_L2) on CD
Surveys: Copies	Appendix L3
Surveys: Electronic	Appendix L4 (2005-01-28_Appendix_L4) on CD
Correspondence: Copies	Appendix L5
Correspondence: Electronic	Appendix L6 (2005-01-28_Appendix_L6) on CD

Miscellaneous: Copies	Appendix L7
Miscellaneous: Electronic	Appendix L8 (2005-01-28_Appendix_L8) on CD

Confidential documents responsive to this request will be submitted under separate cover to the agency's Office of Chief Counsel as Appendix K.

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 contained in Appendix M1 (file: 2005-01-28_Appendix_M1) on the enclosed CD. Non-confidential copies of the redacted copies are provided in Appendix M2. Confidential redacted copies of the documents will be provided under separate cover with a request for confidentiality to the agency's Office of Chief Counsel as Appendix M3 (file: 2005-01-28_Appendix_M3).

Request 13

Identify and describe all significant modifications or changes made by or on behalf of Ford in the manufacture, design, or material composition of the SCDS, the electrical circuit containing the SCDS, the Electrical Connector to the SCDS, and the seal used between the SCDS and the Electrical Connector used in subject and peer vehicles. The following information must be included for each such modification or change:

- a. The make and model year of the vehicle that the design applies to;
- b. The date, or approximate date on which the modification or change was incorporated into production;
- c. A description of the modification or change;
- d. The reason for the modification or change;
- e. The part number of the modified part;
- f. Whether the original unmodified component was withdrawn from sale, and if so, when; and;
- g. Whether the modified or changed components can be interchanged with earlier production components.

Answer

A table of the requested changes is provided electronically as Appendix N (file: 2005-01-28_Appendix_N) on the enclosed CD.

Request 14

State the number of each of the following that Ford has sold that may be used in subject and peer 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. Speed Control Deactivation Switches; and
- b. 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) Also identify by make, model and

model year, any other vehicles of which Ford is aware that contain the same part number component, whether installed in production or in service, and state the applicable dates of production or service usage.

Provide this information in Microsoft Access 2000, or a compatible format, entitled "REQUEST NUMBER FOURTEEN DATA." See Enclosure 1, Data Collection Disc, for a pre-formatted table designed for this submission.

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 was made.

Ford is providing in electronic form in Appendix O (file: 2005-01-28_Appendix_O) on the enclosed CD the total number of Ford service replacement speed control deactivation switches by part number (both service and engineering) and calendar month and year of sale, where available. The subject component is also included in some master cylinders sold for service. The total number of master cylinder service parts sold that contained the subject component is also included in Appendix O. A list of models and model years for which these parts are released and supplier names and contacts are also provided in this appendix. The subject component and master cylinder service parts are capable of servicing a range of vehicles larger than the subject and peer vehicle group; Ford is unable to identify the specific model or model year of the vehicle in which the service parts are installed, only the total volume of service parts sold.

Request 15

Furnish a copy of the design, test, and quality assurance specifications and drawings for the subject components and any other device used as a method of cruise control deactivation on subject and peer vehicles. Include in this information any part numbers used to identify the different designs and how to interpret that part number.

Answer

The requested part drawings are provided in Appendix P. The requested specification (ES-F2VC-9F924-AA) has been provided to agency in Confidential Appendix G in Ford's response to EA02-025.

Request 16

Provide the speed control strategies for any Ford model vehicles that contain a SCDS similar in design to the subject component for the 1992 through 2002 model years.

Answer

A document describing the requested speed control strategies is provided in Appendix Q (file: 2005-01-28_Appendix_Q) on the enclosed CD.

Request 17

Provide the peak operating and hot soak temperatures in the area of the subject component on subject and peer vehicles.

Answer

A document describing the underhood temperatures is provided in Appendix R (file: 2005-01-28_Appendix_R) on the enclosed CD.

Request 18

State whether Ford has ever conducted, or is aware of, any returned part analyses in subject vehicles related to the alleged defect. If so, describe, and provide electronic copies of all documents relating to, any and all returned part analyses of subject components. Include in your description the total number of such parts returned, the number analyzed, a description of how they were analyzed. Include any and all material showing the frequencies of failed components as a function of service life or mileage.

Answer

Ford has not located any returned part analysis of the subject components used in the subject vehicles in its searches. See Ford's response to request 12 for future subject component testing.

Request 19

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

- a. All causal or contributory factors;
- b. Any warning symptoms;
- c. The failure mode;
- d. The root cause of the failures;
- e. Its potential effect on occupant safety;
- f. The potential for future occurrences of the alleged defect in the subject vehicles;
- g. The relative contribution of Kapton diaphragm failures to the total number of subject component failures, including how this changes over the service life of the parts (e.g., state whether it is considered a greater contributor later in life than it is early in life);
- h. The risk of under hood fire in each of the subject models as a function of time in comparison to other medium to large-sized passenger cars at similar ages; and,
- i. The relative contribution of the subject component to the incidence of under hood fires in the subject models over the service life of the vehicle and state the bases for the assessment.

Answer

As the agency is aware, we have recently initiated Safety Recall 05S28 which includes 2000 model year Ford F-150, Ford Expedition and Lincoln Navigator vehicles, as well as 2001 model year F-150 Supercrew vehicles built through August 7, 2000. We have done so because we identified an increasing number of fires allegedly related to the speed control deactivation switch on these vehicles. We will continue to cooperate with this investigation and we will keep the agency informed of our actions.

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