

Ford Motor Company

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

February 21, 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

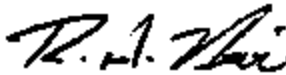
Dear Ms. DeMeter:

Subject: PE04-081:NVS-212pcc

The Ford Motor Company (Ford) response to the agency's January 5, 2005, letter requesting certain information concerning Ford Focus vehicles is attached. Ford understands that there is no alleged defect with respect to any of its vehicles and is providing this information as part of the agency's investigation of another manufacturer's vehicles.

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

Sincerely,



James P. Vondale

Attachment

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OFFICE OF DEFECTS INVESTIGATION

FORD MOTOR COMPANY (FORD) RESPONSE TO PE04-081

Ford's response to this Preliminary Evaluation peer vehicle 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 February 2, 2005 telephone conversation, Thomas Cooper of the agency informed Ford personnel that the subject peer vehicles are 2001 to 2003 model year Ford Focus vehicles equipped with side air bags.

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 January 19, 2005, the date of your inquiry. Ford has searched for responsive documents within the following offices: Ford Customer Service Division, Marketing and Sales Operations, Purchasing, Quality, Research, Global Core Engineering, Office of the General Counsel, Vehicle Operations, and North American Car Product Development.

Request 1

State, by model and model year, the number of subject peer vehicles Ford has manufactured for sale or lease in the United States. If there are multiple side air bag system designs or versions for a given subject peer vehicle, please identify under section "e." Separately, for each model subject vehicle manufactured to date by Ford, state the following:

- a. Vehicle identification number (VIN);
- b. Make;
- c. Model;
- d. Model Year;
- e. Air bag system model version (if more than one);
- f. Date of manufacture;

- g. Date warranty coverage commenced; and
- h. 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."

Answer

Ford records show that the approximate total number of 2001 to 2003 model year Ford Focus vehicles equipped with side air bags 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 71,191.

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

Model	2001 MY	2002 MY	2003 MY
Focus	23,703	28,466	21,022

The requested data for each subject peer vehicle is provided electronically in Appendix A (filename: 2005-02-21 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 is otherwise aware, which relate to, or may relate to, the subject condition in the subject peer 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 (including own vehicle); 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). Identify reports that have a duplicate with either other mfg reports/claims or with ODI.

In addition, for items "b" 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 along with any photographs

and air bag control module diagnostic result/readout/printout (along with explanation/description). For items f and g, 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 subject condition and any related documents, Ford has gathered "owner reports" and "field reports" maintained by Ford Customer Service Division (FCSD), Internalized 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: 2005-02-21 Appendix B) on the enclosed CD.

Each relevant report was identified as a category A.

Owner Reports: Records identified in a search and review of the Master Owner Relations Systems (MORS) database, as described in Appendix B, were reviewed for relevance and categorized as described above. The number of relevant owner reports identified in this search and review is provided in the MORS III portion of the electronic database contained in Appendix C (filename: 2005-02-21 Appendix C) on the enclosed CD. Copies of these categorized owner reports also are provided in Appendix C. The categorization of each report is identified in the "Category" field.

When we were able to identify that duplicate responsive owner reports for an alleged incident were received, each of these duplicate reports was marked accordingly, and the group counted as one report.

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 owner reports indicate that they are Legal Contacts, Ford has gathered the related files from the Litigation Prevention section. Non-privileged documents for files related to the category "A" owner reports that were located are provided electronically in Appendices D and D1 (filenames: 2005-02-21 Appendix D/D1) on the enclosed CD.

ICCD Information: A search of the ICCD database as described in Appendix B located no reports that may relate to the subject condition.

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 subject condition in the subject peer vehicles. No fleet reports were identified that match the subject condition.

Field Reports: Records identified in a search and review of the Common Quality Indicator System (CQIS) database, as described in Appendix B, were reviewed for relevance and categorized as described above. The number of relevant field reports identified in this search and review is provided in Appendix C on the enclosed CD. Copies of these categorized field

reports are provided in the CQIS portion of the electronic database that is also contained in Appendix C. The categorization of each report is identified in the "Category" field.

When we were able to identify that responsive duplicate field reports for an alleged incident were received, each of these duplicate reports was marked accordingly, and the group counted as one report. In addition, CQIS reports that are duplicative of owner reports are provided in Appendix C but are not included in the report count provided in Appendix C.

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 searched UDB for reports responsive to Request 2. A search of UDB, as described in Appendix B, was thus conducted. The number of UDB reports identified in this search and review is provided in Appendix C on the enclosed CD. Copies of these categorized reports are provided in the UDB portion of the electronic database also contained in Appendix C. The categorization of each report is identified in the "Category" field.

When we were able to identify that responsive duplicate UDB reports for an alleged incident were received, each of these duplicate reports was marked accordingly, and the group counted as one report. In addition, UDB reports that are duplicative of owner and field reports are provided in Appendix C, but are not included in the report count provided in Appendix C.

Crash/Injury Incident Claims: For purposes of identifying allegations of accidents or injuries that may have resulted from the subject condition, Ford has reviewed responsive owner and field reports, lawsuits and claims, and warranty claims. A chart identifying potentially relevant allegations is being provided electronically as Appendix H (filename: 2005-02-21 Appendix H) on the enclosed CD. Copies of corresponding reports are provided in Appendix C.

Based on a reasonable and diligent search, Ford located one owner (MORS) report alleging an accident that may be related to the subject condition. The owner made the allegation of an accident during the initial contact with Ford and no details were provided. It is noteworthy that subsequent contacts contain no further mention of the alleged accident. Ford notes that all of the injuries alleged were minor in nature.

Claims, Lawsuits, and Arbitrations: For purposes of identifying incidents potentially related to the subject condition, 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 no lawsuits, one claim (duplicative of an owner report- VIN: 1FAHP34P91W[REDACTED]), and no arbitrations that appear to relate to the subject condition in the subject peer vehicles. It is noteworthy that the subrogation claim was subsequently closed after the claimant failed to provide any information after the initial contact with Ford. A copy of the claim is provided electronically in Appendix E (filename: 2005-02-21 Appendix E) of the enclosed CD.

As described in Ford's June 13, 2003 response to PE03-011 and December 11, 2003 response to EA03-014, Ford's side air bag sensing systems are very complex in nature and were designed to provide head, neck and thorax protection in a wide variety of impact events. Due to the relative closeness of the occupant's body to the side of a vehicle, the head/thorax side air

bag sensor system must determine whether to deploy the air bag within just a few milliseconds of the start of the impact event in order to provide enhanced levels of head and thorax protection in severe side impacts. This is a significantly shorter period of time than is required for some other side air bag systems because the combination head/thorax bag must inflate to provide protection before the relatively narrow gap between the vehicle and the occupant is closed sufficiently to prevent the head portion of the bag from providing protection. Because there is only an extremely short period of time for data gathering and analysis, in some circumstances, the system may not be able to discriminate a side impact from other types of extraordinary events. Certain events that would not ordinarily be considered accidents may provide sufficient impact acceleration to simulate the initial onset of a side impact significant enough to require side air bag deployment. To balance the need for early deployment with the risk of injury from bag deployment, Ford's side air bag systems are designed to make deployment decisions early while deploying with relatively benign force. Consequently, Ford's side air bag systems have excellent occupant out of position performance.

Of the responsive reports provided in Appendix C that indicate a potential cause for the alleged deployment in 2001-2003 model year Focus peer vehicles, approximately 82% appear to be the result of the vehicle striking an object in the road (specific examples include pieces of concrete and wood) or contain evidence of vehicle damage, some of which was severe (specific examples include damaged lower control arms, holes in floor pans, and bent wheels). In the remaining reports, no explanation for the alleged deployment is indicated. Ford has not undertaken to investigate such reports and therefore is uncertain if evidence of a preceding event exists in these incidents. Omission in a report of indication of damage or impact does not mean there was no impact. For instance, in the CQIS report related to VIN 1FAHP36372W [REDACTED] the operator alleges the air bag deployed while the vehicle was "sitting in traffic." However, inspection performed by a dealership technician identified underbody damage. It is noteworthy that many instances report simply hitting a pothole; however, additional information related to those events frequently shows that the impact was sufficiently severe to damage wheels, tires and suspension components.

Request 3

State, by model and model year, the number and 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 subject condition in the subject 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 this information in Microsoft Excel table, or a compatible format, entitled "WARRANTY DATA COUNT."

Answer

Records identified in a search and review of the AWS database, as described in Appendix B, were reviewed for relevance and categorized in accordance with the category described in the response to Request 2. The number of relevant warranty claims identified in this search and review is provided in Appendix C on the enclosed CD. Copies of these categorized warranty

claims are provided in the AWS portion of the electronic database that are also contained in Appendix C. The categorization of each report is identified in the "Category" field.

Electronic copies of these claims are provided in the AWS portion of the electronic database contained in Appendix C. When we were able to identify that duplicate warranty claims for an alleged incident were received, each of these duplicate claims was marked accordingly and the group counted as one report. Also, warranty claims that are duplicative of field reports are provided in Appendix C, but are not included in the report count provided in Appendix C.

Requests for "goodwill, field, or zone adjustments" received by Ford to date that relate to the subject condition in the subject peer vehicles that were not honored, if any, would be indicated 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 4

Describe in detail the search criteria used by Ford to identify the claims identified in response to Request No. 3, 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 subject condition in the subject peer vehicles. State, by make and model year, the terms of the new vehicle warranty coverage offered by Ford on the subject peer vehicles (i.e., the number of months and mileage for which coverage is provided and the vehicle systems that are covered) and if it covers inadvertent side-air bag deployments (without an actual side crash, but sensors did sense a shock pulse). Describe any extended warranty coverage option(s) that Ford offered for the subject peer vehicles and state by option, model, and model year, the number of vehicles that are covered under each such extended warranty and if it covers inadvertent side-air bag deployments.

Answer

Detailed descriptions of the search criteria, including all pertinent parameters, used to identify the claims provided in response to Request 2 are described in Appendix B. The 2001 to 2003 model year Focus peer vehicles include the following warranty coverages:

- 36 month/36,000 miles bumper-to-bumper
- 60 month/50,000 miles safety restraint system
- 60 month/unlimited miles corrosion (perforation only)

The safety restraint system warranty coverage warrants the vehicle's safety belts and air bag system against defects in factory-supplied materials and workmanship. The extended warranty programs that Ford offered, as well as the number of owners who chose to participate in those programs is provided electronically in Appendix F (filename: 2005-02-21 Appendix F) on the enclosed CD.

As provided in Ford's December 11, 2003 response to EA03-014, Ford's policy (as stated in the ISM provided in Appendix F to that response) is to repair vehicles under warranty where the vehicle is within the warranty period and there is no indication of evidence of any underbody or

impact damage. For those vehicles falling outside the warranty period, Ford is aware that its dealerships may, on a case-by-case basis, choose to make a business decision to financially assist the owners with repairs when no indication of impact or damage is found. Dealerships provide this assistance at their discretion. When indication of an underbody impact or other non-side impact events are discovered, the owner's insurance company covers the repairs, with full right of subrogation.

Request 5

Provide a table showing the following information concerning the side-impact air bag systems in the subject peer vehicles by model and model year:

- a. type of side air bag system (thorax, head, curtain or combination thereof);
- b. location of each seating position at which a side air bag system is installed;
- c. the number of side air bags at each of those seating positions; and
- d. bag location (seat mounted, door mounted, etc.)

Answer

All 2001 to 2003 model year Focus vehicles equipped with side air bags are equipped with:

- a. A combination head and thorax air bag
- b. Air bags are located at the front, outboard seat positions
- c. One combination air bag is located at each of those positions
- d. The air bags are seat mounted

Request 6

For each model, model year of the subject peer vehicles, identify the supplier of the side-impact crash sensing system and electronic restraint module. Please provide a complete street address, contact name, and telephone number for each supplier identified.

Answer

The information provided in response to this information inquiry is provided electronically in Appendix G (filename: 2005-02-21 Appendix G) on the enclosed CD.

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