



NHTSA
WASHINGTON, DC 20590

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

2005 NOV 25 A 11: 37

Fairlane Plaza South
330 Town Center Drive
Dearborn, MI 48126-2738 USA

OFFICE OF CHIEF
COUNSEL

November 22, 2005

Mr. Stephen Wood, Esq.
Acting Chief Counsel
National Highway Traffic Safety Administration
400 Seventh Street, S.W.
Washington, D.C. 20590

Dear Mr. Wood:

Subject: Request Under 49 CFR Part 512 for Confidential Treatment of Information

Two copies of confidential information referenced in the Ford Motor Company (Ford) November 22, 2005 response to the agency's October 13, 2005 inquiry, PE05-054, are attached. Also attached for your reference is a copy of the non-confidential portion of Ford's response to the ODI's information request.

This letter and the attached supplier certificate provide support for the Ford and Visteon claims of confidentiality in accordance with 49 CFR Part 512.8. Ford and Visteon request confidential treatment for the documents included in Appendix F on the enclosed CD because the documents are not customarily released to the public by Ford or Visteon and because the documents contain confidential business information, the disclosure of which would likely cause substantial competitive harm to Ford or Visteon (as contemplated in 49 CFR § 512.15, and 5 U.S.C. § 552(b)(4)). In response to direction provided by your office concerning prior confidentiality submissions, the confidential documents in this submission are organized into categories as set forth in Attachment I.


Ford documents of the types listed are maintained under a record keeping system which is intended to control dissemination of this material within Ford, and to assure that the material is not disseminated outside of Ford, except as described in the attached certification, which is made pursuant to 49 CFR Part 512.4(b). Neither NHTSA nor other Federal agencies nor Federal courts have made determinations relating to the confidentiality of the submitted information or similar information, to the best of Ford's knowledge. Documents provided in Appendix F are labeled "ENTIRE PAGE CONFIDENTIAL" or "CONFIDENTIAL" if Ford is claiming only a portion of the document as confidential.

Ford requests that these documents be granted confidential treatment by the agency for a period of ten years. Earlier disclosure of these documents, in Ford's opinion, would result in substantial competitive harm.



In the event that the agency should conclude that all or part of the submitted information is not to be given confidential treatment, Ford asks the agency to provide reasonable notice of not less than ten working days prior to any contemplated disclosure in order that Ford may pursue such legal remedies as it may choose. Please direct all written communication to Mr. Ray Nevi, Ford Motor Company, Suite 500, Fairlane Plaza South, 330 Town Center Drive, Dearborn, Michigan 48126. Please direct all non-written communication to Mr. Paul Fabien who may be contacted by telephone at (313) 621-1858. Thank you for your continuing courtesy.

Sincerely,



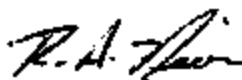
James P. Vondale

Attachments

**CERTIFICATE IN SUPPORT OF REQUEST
FOR CONFIDENTIALITY**

I, R. A. Nevi, pursuant to the provisions of 49 CFR Part 512, state as follows:

1. I am Assistant Director, Global Automotive Safety Compliance, Automotive Safety Office, and I am authorized by Ford Motor Company (Ford) to execute documents of this nature on behalf of Ford;
2. The information contained in the attachment to Ford's letter to NHTSA's Office of the Chief Counsel dated November 22, 2005 contains confidential and proprietary data and is submitted with the claim that it is entitled to confidential treatment under 5 U.S.C., § 552(b)(4);
3. A member of my staff has inquired of the responsible Ford personnel who have authority in the normal course of business to release the type of information for which a claim of confidentiality has been made to ascertain whether such information has ever been released outside Ford;
4. Based upon such inquiries, to the best of my knowledge, information and belief, the information for which Ford has claimed confidential treatment has never been released or become available outside Ford except as hereinafter specified:
 - Portions of these documents may have been or may be shared with Ford suppliers with the expectation that they will be kept confidential.
 - During the course of defending itself in litigation, Ford may have been, or may be required to produce such information.
5. I make no representations beyond those contained in this certificate and, in particular, I make no representations as to whether this information may become available outside Ford because of unauthorized or inadvertent disclosure, except as stated in Paragraph 4; and
6. I certify under penalty of perjury that the foregoing is true and correct. Executed on this the 22nd day of November 2005.



R. A. Nevi

**CERTIFICATE IN SUPPORT OF REQUEST
FOR CONFIDENTIALITY**

I, Tom Hutchison, pursuant to the provisions of 49 CFR Part 512, state as follows:

1. I am Director, Corporate Safety and Environment and I am authorized by Visteon Corporation to execute documents of this nature on behalf of Visteon Corporation;
2. The information identified by Bates Label Range PE05-054 01 00003; PE05-054 01 00010; and PE05-054 01 00015-16 in Attachment I to Ford's Request for Confidentiality regarding NHTSA Inquiry PE05-054 contains confidential and proprietary data and is submitted with the claim that it is entitled to confidential treatment under 5 U.S.C., § 552(b)(4);
3. I hereby request that the information contained in (pertinent document(s)) be protected for a period of Ten (10) Years;
4. A member of my staff has inquired of the responsible Visteon Corporation personnel who have authority in the normal course of business to release the type of information for which a claim of confidentiality has been made to ascertain whether such information has ever been released outside Visteon Corporation;
5. Based upon such inquiries, to the best of my knowledge, information and belief, the information for which Ford and Visteon Corporation have claimed confidential treatment has never been released or become available outside Visteon Corporation except as hereinafter specified:
 - Portions of these documents may have been or may be shared with Ford and/or other customers or suppliers of Visteon Corporation with the expectation that they will be kept confidential.
 - During the course of defending itself in litigation, Visteon Corporation may have been, or may be required to produce such information.
6. I make no representations beyond those contained in this certificate and, in particular, I make no representations as to whether this information may become available outside Visteon Corporation because of unauthorized or inadvertent disclosure, except as stated in Paragraph 5; and
7. I certify under penalty of perjury that the foregoing is true and correct. Executed on this the 16 day of November 2005.



Tom Hutchison
Director, Corporate Safety and Environment

Request for Confidential Treatment of Documents

Appendix	Document Type	Document Description	Reason for Confidential Treatment
F	Test Procedures or Specifications	Internal test procedures developed by Ford Motor Company to be used by Ford and its suppliers to during the design and development of its vehicles.	Information concerning or revealing Ford's testing programs, including test requests, specifications and results could be used by competitors to improve their own products and processes without the need to invest the substantial resources invested by Ford.
F	Engineering Design Specifications	Internal Ford Motor Company document containing necessary information to be used by Ford and its suppliers to produce or evaluate parts which are usually issued in conjunction with engineering drawings during the design and development of its vehicles.	Information concerning Ford's engineering design processes could be used by competitors to develop or improve their own products and processes without the need to invest the substantial resources invested by Ford.
F	Engineering Design Drawings	Ford Motor Company's and its suppliers' release level drawings of its vehicles, systems, sub-systems, and components.	The details contained in release level drawings contain Ford proprietary intellectual property and could be used by competitors to develop or improve their own products and processes without the need to invest the substantial resources invested by Ford.
F	Design Verification Plan and Report (DV&R)	Internal Ford Motor Company documents reflecting test plans, procedures and results conducted by Ford Motor Company, or on behalf of Ford Motor Company by a third party vendor or supplier.	Information concerning or revealing Ford's testing programs, including test requests, specifications and results could be used by competitors to improve their own products and processes without the need to invest the substantial resources invested by Ford.
F	Design Failure Mode and Effects Analysis (DFMEA)	Internal studies by Ford Motor Company engineers, or on behalf of Ford Motor Company by a supplier conducted in an effort to improve Ford's product design, or to determine the root cause of the alleged defect which is the basis of this investigation.	Information concerning Ford's engineering design processes could be used by competitors to develop or improve their own products and processes without the need to invest the substantial resources invested by Ford.
F	Test Results / Reports / Analysis	Documents reflecting the results of engineering testing conducted by Ford Motor Company, or on behalf of Ford Motor Company by a third party vendor or supplier.	Information concerning or revealing Ford's testing programs, including test requests, specifications and results could be used by competitors to improve their own products and processes without the need to invest the substantial resources invested by Ford.



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

Fairlane Plaza South
330 Town Center Drive
Dearborn, MI 48126-2738 USA

November 22, 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: PE05-054:NVS-213dlr

The Ford Motor Company (Ford) response to the agency's October 13, 2005, letter requesting certain information concerning alleged rear coil spring fracture on 2000 and 2001 model year Taurus and Sable sedans is attached.

While the alleged defect is an apparent source of dissatisfaction to owners, it has not posed any risk for the safe operation of vehicles. This is supported by the fact that there are no allegations of accidents or injuries in the population of responsive reports related to the alleged defect in the subject vehicles, some of which have been in service for over six years.

The majority of the responsive reports allege that a rear coil spring fractured with no resulting tire contact. Other reports may allege damage to a tire, but approximately half of these do not allege loss of air. In reports where loss of air from a tire due to contact from a fractured rear coil spring is alleged, Ford believes that the most likely event is coil spring rub against the sidewall of the tire for a period of time until the sidewall is eventually penetrated and a slow loss of air occurs. Ford believes that this slow loss of air is not unlike a typical flat tire that can occur from any number of causes. Such events are consistent with Ford's belief that the rear suspension design on the subject vehicles minimizes the opportunity for tire interaction from a fractured spring.

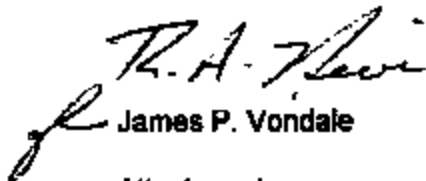
Even in the unlikely event of a rapid air loss, passenger cars, such as the Taurus and Sable, are very stable. The lack of any reported accidents or injuries as a result of alleged rear coil spring fracture on the subject vehicles is consistent with the agency's statement in its PE00-040 closing resume "that some classes of vehicles are more sensitive to loss of stability with catastrophic tire failures... In this instance, full-size vans are disproportionately involved in the severe crashes." The agency also noted in its closing resume for PE00-046, related to Goodyear tires, that failures of [subject] tires other than on large vans have only rarely had serious safety consequences.



Based on the complete lack of accidents on vehicles with up to six years in service, the position of the spring relative to the tire, and the controllability of the vehicle, the data show that rear coil spring fracture in the subject vehicles has not posed any risk to motor vehicle safety.

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 PE05-054

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. 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.

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 October 13, 2005, the date of your inquiry. Ford has searched within the following offices for responsive documents: Environmental and Safety Engineering, Ford Customer Service Division, Marketing and Sales Operations, 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 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 2003, or a compatible format, entitled "PRODUCTION DATA." See Enclosure 1, Data Collection Disc, for a pre-formatted table that provides further details regarding this submission.

Answer

Ford records indicate that the approximate total number of 2000 and 2001 Ford Taurus and Mercury Sable sedans 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 831,931.

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

Model	2000 MY	2001 MY
Ford Taurus sedan	321,323	334,466
Mercury Sable sedan	83,777	92,365

The requested data for each subject vehicle is provided electronically in Appendix A (filename: 2005-11-22 Appendix A) 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 of, or requests for, roadside assistance or recovery
- d. 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;
- e. Property damage claims,
- f. Third-party arbitration proceedings where Ford is or was a party to the arbitration; and
- g. Lawsuits, both pending and closed, in which Ford is or was a defendant or codefendant.

For subparts "a" through "g" 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 "d" through "g", 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 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 that may be related to the alleged defect and any related documents, Ford has gathered "owner reports" and "field reports" maintained by Ford

Customer Service Division (FCSD), fleet reports maintained in a Fleet Test Database, and claim and lawsuit information maintained by Ford's Office of the General Counsel (OGC). The agency will note that we are not referencing searches of the Intensified Customer Concern Definition (ICCD) files as in previous responses to other of the agency's information requests. ICCD records are now maintained in Ford owner report files. Therefore, our searches of the owner report files include ICCD records.

Descriptions of the FCSD owner and field report systems, and the Fleet Test Database system, and the criteria used to search each of these are provided electronically in Appendix B (filename: 2005-11-22 Appendix B) on the enclosed CD.

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

Category	Allegation
A1	Alleged rear suspension coil spring fracture with tire contact and indication of loss of air
A2	Alleged rear suspension coil spring fracture with tire contact and no indication of loss of air
A3	Alleged rear suspension coil spring fracture with no allegation of tire contact
B	Ambiguous condition of rear suspension coil spring, or unable to determine if front or rear spring

We are providing electronic copies of reports categorized as "B" 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: Records identified in a search of the Master Owner Relations Systems (MORS) database, as described in Appendix B, were reviewed for relevance and categorized in accordance with the categories described above. The number of relevant owner reports identified in this review that may relate to the agency's investigation is provided in Appendix C (filename: 2005-11-22 Appendix C) on the enclosed CD. Copies of these categorized owner reports are provided in the MORS III 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 (i.e., not ambiguous) duplicate owner reports for an alleged incident were received, each of these duplicate reports was marked accordingly, and the group 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 have been 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 indicate that they are Legal Contacts, Ford has gathered the related files from the Litigation Prevention section. Non-privileged documents for files that were located that are related to the responsive owner reports are provided electronically in Appendix D (filename: 2005-11-22 Appendix D) on the enclosed CD.

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 that may relate to the subject defect.

Field Reports: Records identified in a search of the Common Quality Indicator System (CQIS) database, as described in Appendix B, were reviewed for relevance and categorized in accordance with the categories described above. The number of relevant field reports identified in this 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 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 other cases, certain vehicles may have experienced more than one incident and have more than one report associated with their VINs. These reports have been counted separately. In addition, field reports that are duplicative of owner reports are provided in Appendix C but are not included in the report count.

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 as described in Appendix B. The number of reports identified in this review that may relate to the agency's investigation is provided in Appendix C. Copies of these categorized field 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 (i.e., not ambiguous) 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 other cases, certain vehicles may have experienced more than one incident and have more than one report associated with their VINs; these reports have been counted separately. UDB records that are duplicative of owner or field reports are provided in Appendix C but are not included in the report count.

Roadside Assistance: The general nature of the data maintained by Ford for the Roadside Assistance Program is not intended to and is not sufficiently specific to identify whether any request for roadside assistance is related to the alleged defect. No information regarding the specific circumstances that precipitated the request of assistance is recorded. In an October 24, 2005 phone conversation Mr. Derek Rinehardt of the agency informed Ford personnel that Ford was not required to conduct a review of the Roadside Assistance Program information in an effort to identify reports that could be related to the alleged defect.

VOQ Data: This information request had an attachment that included 131 Vehicle Owner's Questionnaires (VOQs), five 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 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. VOQs 10066843 and 10121962 did not contain sufficient information that could be used in a search of Ford's files for related reports, and VOQs, 10115498 and 10051705 contained invalid VINs. 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.

Crash/Injury Incident Claims: For purposes of identifying allegations of accidents or injuries that may have resulted from the alleged defect, Ford has reviewed responsive owner and field reports, and lawsuits and claims. No reports alleging crash or injury resulting from the alleged defect were identified.

Claims, Lawsuits, and Arbitrations: For purposes of identifying incidents that may relate to the alleged defect, Ford has searched 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, claims, consumer breach of warranty lawsuits, or arbitrations that appear to relate to the alleged defect in the subject vehicles. Further, Ford located no lawsuits, claims, or consumer breach of warranty lawsuits that are ambiguous as to whether they meet the alleged defect criteria.

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. Report or claim date;
- i. Spring Position (driver, passenger or both sides)
- j. Whether a crash 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 2003, or a compatible format, entitled "REQUEST NUMBER TWO DATA." See Enclosure 1, Data Collection Disc, for a pre-formatted table that provides further details regarding this submission.

Answer

Ford is providing owner and field reports in the electronic database contained in Appendix C 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. When we were able to identify the spring position of the alleged fractured spring(s) (driver, passenger, or both sides) as requested, this information is included for responsive (i.e., not ambiguous) reports in Appendix C.

Request 4

Produce 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 owner and field reports in the electronic database contained in Appendix C on the enclosed CD in response to Request 2. To the extent information sought in Request 4 is available, it is provided in the referenced appendix.

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 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. Spring Position (Driver, Passenger or Both Sides)
- f. Vehicle mileage at time of repair;
- g. Repairing dealer's or facility's name, telephone number, city and state or ZIP code;
- h. Labor operation number;
- i. Problem code;
- j. Replacement part number(s) and description(s);
- k. Concern stated by customer; and
- l. Comment, if any, by dealer/technician relating to claim and/or repair.

Provide this information in Microsoft Access 2003, or a compatible format, entitled "WARRANTY DATA." See Enclosure 1, Data Collection Disc, for a pre-formatted table that provides further details regarding this submission.

Answer

Records identified in a search of the AWS database, as described in Appendix B, were reviewed for relevance and categorized in accordance with the categories described in the response to Request 2. The number of relevant warranty claims identified in this search 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 also 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 have been counted separately. Warranty claims that are duplicative of owner and field reports are provided in Appendix C but are not included in the report count.

Requests for "goodwill, field or zone adjustments" received by Ford to date that relate to the alleged defect that were not honored, if any, would be included in the MORS reports identified above in response to Request 2. Requests for such adjustments that were honored are included in the warranty claims provided in Appendix C.

When we were able to identify the spring position of the alleged fractured spring(s) (driver, passenger, or both sides) as requested, this information is included for responsive (i.e., not ambiguous) reports in Appendix C. Ford assumes that providing the categorized warranty claims in the electronic database format meets the requirements of this request because the agency can review or order the claims as desired.

Request 6

Describe in detail the search criteria used by Ford to identify the claims identified in response to Request No. 5, 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

Detailed descriptions of the search criteria, including all pertinent parameters, used to identify the claims provided in response to Request 5 are described in Appendix B.

For 2000 and 2001 model year Taurus and Sable vehicles, the New Vehicle Limited Warranty, Bumper-to-Bumper Coverage begins at the warranty start date and lasts for three years or 36,000 miles, whichever occurs first. Optional Extended Service Plans (ESPs) were available to cover various vehicle systems, time in service and mileage increments. Rear coil springs are covered under the PremiumCare ESP. Details of the various time in service and mileage options are provided electronically in Appendix E (filename: 2005-11-22 Appendix E) on the enclosed CD. As of October 13, 2005, 105,565 PremiumCare ESP policies had been purchased for 2000 and 2001 Ford Taurus and Mercury Sable sedans.

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 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 Ford is planning to issue within the next 120 days.

Answer

For purposes of identifying communications to dealers, zone offices, or field offices pertaining, at least in part, to rear coil spring fractures on 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 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 or 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 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 is construing this request broadly and providing not only studies, surveys, and investigations related to the alleged defect, but also notes, correspondence, and other communications that were located pursuant to a diligent search for the requested information. Ford is submitting responsive documentation in Appendix F with a request for confidentiality under separate cover to the agency's Office of the Chief Counsel pursuant to 49 CFR, Part 512.

To the extent the information requested is available, it is included in the documents provided. If the agency should have additional questions concerning any of the documents, please advise.

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 in Appendix G (filename: 2005-11-22 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;
- b. Pictures of field return samples of the subject component exhibiting the subject failure mode; including identification of the spring position (driver, passenger or both) and damage to any other vehicle components as a result of the alleged defect. And;
- c. 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

The subject component is no longer used in production or available in service. A substantially similar sample of a rear coil spring (part number 3F1C-5560-CA) is included with this submission.

Pictures of field return samples of the subject component exhibiting fracture and their respective field reports are provided electronically in Appendix H (folder name: 2005-11-22 Appendix H) on the enclosed CD. Identification of the spring position and any damage to other vehicle components as a result of the alleged defect, if available, is included in the field reports. Additional pictures of the subject component exhibiting fracture are provided electronically in Appendix I (folder name: 2005-11-22 Appendix I) on the enclosed CD. These additional

pictures are organized by their respective field report number. The field reports associated with the pictures in Appendix I are provided in the CQIS portion of Appendix C.

Ford has identified no kits that have been released, or developed, by Ford for use in service repairs to the subject component on the subject vehicles.

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; 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 identical component, whether installed in production or in service, and state the applicable dates of production or service usage.

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 the installation was made. Nevertheless, the requested service part information for the subject component is provided electronically in Appendix J (filename: 2005-11-22 Appendix J) on the enclosed CD. Monthly sales are not readily available for service parts that have been replaced and are no longer available.

Ford has identified no kits that have been released, or developed, by Ford for use in service repairs to the subject component on the subject vehicles.

The subject component was also used in production on 2002, 2003 and certain 2004 model year Taurus and Sable sedans.

Request 12

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 risk to motor vehicle safety that it poses;
- e. 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; and

The reports included with this inquiry.

Answer

While the alleged defect is an apparent source of dissatisfaction to owners, it has not posed any risk for the safe operation of vehicles. This is supported by the fact that there are no allegations of accidents or injuries in the population of responsive reports related to the alleged defect in the subject vehicles, some of which have been in service for over six years.

The majority of the responsive reports allege that a rear coil spring fractured with no resulting tire contact. These reports typically indicate that the customer noticed noise from the area of the rear suspension of the vehicle, that the vehicle leaned or sagged, or the fractured spring may have been discovered during routine maintenance or a vehicle inspection. Other reports may allege damage to a tire, but approximately half of these do not allege loss of air, and again the typical customer complaint was noise from the rear of the vehicle, or that the vehicle leaned or sagged. This indicates that the customer had sufficient time to have the vehicle serviced before any loss of air from the tire occurred. When reported, the alleged tire damage is typically described as a groove in the sidewall on the inboard side of the tire. Photos illustrating this condition are provided in Appendix H for field report 5KCBN002 and Appendix I for field report numbers 4DOHE001, 4EXBA463, 5BIBS068, and 5BODE209.

In reports where loss of air from a tire due to contact from a fractured rear coil spring is alleged, Ford believes that the most likely event is coil spring rub against the sidewall of the tire for a period of time until the sidewall is eventually penetrated and a slow loss of air occurs. This period of time between spring fracture and loss of air from the tire makes it difficult to determine when the coil spring actually fractured on vehicles that have reportedly experienced a flat tire. Photos illustrating this condition are provided in Appendix H for field report 5J5EE002. Also, when tire damage was alleged to have occurred due to a fractured rear coil spring, the customer again often reported hearing a noise from the rear of the vehicle or that there was other evidence of a rubbing tire, giving the customer warning of a problem with the vehicle. Ford believes that slow loss of air is not unlike a typical flat tire that can occur from any number of causes.

Such events are consistent with Ford's belief that the rear suspension design on the subject vehicles, which consists of a fixed upper spring seat, a straight cylindrical coil spring, and a lower spring seat designed with minimal side load compensation, minimizes the opportunity for tire interaction from a fractured spring. In comparison, the front coil spring design on the subject vehicles includes a rotating upper spring seat, a semi-barrel shaped coil spring, and a lower spring seat with greater side load compensation than the rear spring seat. The design of the rear coil spring is likely to inhibit rotation of a fractured spring, inhibit a fractured spring from falling below the spring seat, and limit the outboard movement of the fractured spring end.

Even in the unlikely event of a rapid air loss event, passenger cars, such as the Taurus and Sabre, are very stable. Ford believes the lack of any reported accidents or injuries as a result of alleged rear coil spring fracture on the subject vehicles is consistent with agency's statement in its PE00-040 closing resume "that some classes of vehicles are more sensitive to loss of stability with catastrophic tire failures... In this instance, full-size vans are disproportionately involved in the severe crashes." The agency also noted in its closing resume for PE00-048, related to Goodyear tires, that failures of [subject] tires other than on large vans have only rarely had serious safety consequences.

Ford believes the recent increase in consumer complaints is primarily due to the announcement in 2004 of field service actions regarding the front coil springs on the subject vehicles.

Customers whose vehicles have required rear coil spring replacement are contacting Ford to inquire about opportunities for financial assistance or if their rear coil springs are covered by any field service actions because they are aware of the programs on the front coil springs.

Based on the complete lack of accidents on vehicles with up to six years in service, the position of the spring relative to the tire, and the controllability of the vehicle, Ford does not believe that rear coil spring fracture in the subject vehicles presents an unreasonable risk to motor vehicle safety. Rear spring fractures have posed no safety risk of any kind in the past six years and there is no basis to believe that they will pose any additional risk in the future.

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