

Ford Motor Company

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

July 29, 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: EA05-007 & 008:NVS-214gtb

The Ford Motor Company (Ford) response to the agency's June 15, 2005, letter requesting certain information concerning 1998 through 2004 model year Ford vehicles equipped with tailgate support cables 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



FORD MOTOR COMPANY (FORD) RESPONSE TO EA05-007 & 008

Ford's response to this Engineering Analysis peer vehicle information request was prepared pursuant to a diligent search for the information requested. We have made every effort to provide thorough and accurate information, and we would be pleased to meet with agency personnel to discuss any aspect of this peer vehicle information request.

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.

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 June 15, 2005, the date of your inquiry. Ford has searched within the following offices for responsive documents: Ford Customer Service Division, Marketing and Sales Operations, Purchasing, Quality, Global Core Engineering, Office of the General Counsel and North American Truck Product Development.

Request 1

Identify by model, model year, and by manufacturing location, the number of subject vehicles (vehicles equipped with tailgate support cables) that Ford has manufactured for sale or lease in the United States since model year 1998.

Provide the table in Microsoft Access or Excel 2000, or a compatible format, entitled "Request Number 1 – Ford, Production Information."

Answer

The approximate total number of subject peer 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 provided in Appendix A (file: 2005-07-29_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, or may relate to, the alleged defect (*) in the subject vehicles received by Ford since January 1, 1998, pertaining to:

- a. Consumer complaints, including those from fleet operators;
- b. Field reports, including dealer field reports;

- c. Reports involving an 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. Reports 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; and
- 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.

(*) ODI has defined the alleged defect as "tailgate support cable breakage." ODI requests that Ford confine its investigation to complaints that are consistent with this failure mode. Reports of tailgate cable breakage may be described by such terms as, "broken," "fractured," "cracked," "cut," "sheared," "separated," "inoperative," etc. Please exclude complaints pertaining to tailgate cables for such issues as cosmetic appearance, fitment, accidental damage, etc. that do not indicate a broken or compromised tailgate support cable or the imminent possibility that the tailgate support cable may lose load-carrying integrity.

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 are to be counted as a field report and a consumer complaint).

In addition, for items "c" 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.

Provide this information in Microsoft Access or Excel 2000, or a compatible format, entitled "Request Number Two - Complaint Summary Data."

Answer

For purposes of identifying reports of incidents potentially involving tailgate support cable breakage 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).

Descriptions of the FCSD owner and field report systems, and the Fleet Test Database systems, and the criteria used to search each of these are provided electronically in Appendix B (file: 2005-07-29_Appendix_B) on the enclosed CD.

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

Category Allegation

A1	One Tailgate Support Cable Broke/Fractured.
A2	Both Tailgate Support Cable Broke/Fractured.

As requested by the agency, Ford confined its searches to reports that are consistent with the breakage or fracture of a tailgate support cable. Detailed search criteria, including keywords used in Ford's searches, are provided in Appendix B. Consistent with the agency's request, we have not provided reports that allege concern with the plastic sheathing or attachment bolts of the support cable, or simply indicate that the cable was replaced but make no mention of cable breakage.

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 C (file: 2005-07-29_Appendix_C) 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.) is also provided in Appendix C. When we were able to identify that responsive (i.e., not ambiguous) duplicate owner reports for an alleged incident were received, each of these duplicate reports is marked accordingly, and the group is counted as one report.

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, four files were located and the copies are provided in Appendix D (file: 2005-05-03_Appendix_D). Ford is not providing confidential documents from these files. If requested by the agency, Ford can provide those documents.

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 category in the CQIS portion of the electronic database contained in Appendix C. Copies of these field reports are also provided in the 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 field reports for an alleged incident were received, each of these duplicate reports is marked accordingly.

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 potentially relevant UDB reports is provided by category in the UDB portion of the electronic database contained in Appendix C. Copies of these UDB reports are also provided in this appendix.

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. These reports have been counted separately. UDB records that are duplicative

of owner or field reports or warranty claims are provided in Appendix C but are not included in the report count.

VOQ Data: This Information request had an attachment that included five Vehicle Owner's Questionnaires (VOQs). Ford made inquiries of its MORS database for customer contacts, and its CQIS database for field reports concerning the vehicles included 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 tailgate support cable breakage 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 alleged accidents or injuries potentially related to tailgate support cable breakage, Ford reviewed owner and field reports, lawsuits and claims, UDB and warranty claims. Reports that contain such allegations are provided in the MORS portion of the electronic database contained in Appendix C and are marked in the "Alleged Injury" field.

Ford notes that the incident pertaining to VIN 1FTYR14V0YF [REDACTED] happened when the complainant was riding on the tailgate while the vehicle was being driven. Ford notes that the owner guide for this vehicle states "It is extremely dangerous to ride in a cargo area..." and further recommends appropriate usage of a safety belt.

Though VOQ 10073188 indicates an injury, the owner simply says "THE TAILGATE DROPPED TO THE BUMPER AND I FELL TO THE GROUND." Ford notes that there is no specific description of any injury in this report. We further note that there is no mention of injury in the provided MORS report relating to this incident.

Claims, Lawsuits, and Arbitrations: For purposes of identifying incidents that may relate to tailgate support cable breakage, 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. Lawsuits and claims gathered in this manner were reviewed for relevance and categorized in accordance with the categories described above.

Based on a reasonable and diligent search, Ford identified one legal claim that appears to relate to the tailgate support cable breakage in the subject peer vehicles. Ford notes that this claim pertains to the incident [VIN 1FTYR14V0YF [REDACTED]] that was referenced in the Accident/Injury section above. Ford is providing the requested information on this claim in the Log of Lawsuits and Claims, as Appendix E (file: 2005-07-29_Appendix_E) on the enclosed CD.

Request 3

Separately, for each item (complaint, report, claim, notice, or matter) within the scope of the 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. Whether property damage is alleged;
- j. Number of alleged injuries, if any; and
- k. Number of alleged fatalities, if any.

Provide this information in Microsoft Access or Excel 2000, or a compatible format, entitled "Request Number Three - Complaint Details."

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. To the extent information sought in Request 3 is available for lawsuits and claims, it is provided in the Log of Lawsuits and Claims in Appendix E1.

Request 4

State, by model and model year, a total count for all of the following categories of claims, collectively, whether reimbursed, adjusted, or not reimbursed 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.

(*) ODI has defined the alleged defect as "tailgate support cable breakage." ODI requests that Ford confine its investigation to complaints that are consistent with this failure mode. Reports of tailgate cable breakage may be described by such terms as, "broken," "fractured," "cracked," "cut," "sheared," "separated," "inoperative," etc. Please exclude complaints pertaining to tailgate cables for such issues as cosmetic appearance, fitment, accidental damage, etc. that do not indicate a broken or compromised tailgate support cable or the imminent possibility that the tailgate support cable may lose load-carrying integrity.

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. Replacement part number(s) and description(s);
- j. Concern stated by customer; and
- k. Comment, if any, by dealer/technician relating to claim and/or repair.
- l. Claim disposition (reimbursed, adjusted, or not reimbursed).

Provide this information in Microsoft Access 2000, or a compatible format, entitled "Request Number Four – Warranty Information."

Answer

In responding to this information request, Ford electronically searched its Analytical Warranty System (AWS) for all claims meeting the criteria described in Appendix B. The resulting claims were searched using the criteria as described in Appendix B and then reviewed individually for allegations that may relate to tailgate support cable breakage. The number of warranty claims and electronic copies of the claims that may relate to tailgate support cable breakage are provided in the AWS portion of the electronic database contained in Appendix C. The categorization of each report is identified in the "Category" field. When we were able to identify that duplicate claims for an alleged incident were received, each of these duplicate claims is marked accordingly and the group is counted as one report. In other cases, certain vehicles may have experienced more than one incident and have more than one claim associated with their VINs. These claims have been counted separately.

Ford assumes that providing the warranty claims in the electronic database format meets the requirements of this request, because the agency can review or order the claims as desired.

Requests for "claims for good will services that were provided; field, zone, or similar adjustments and reimbursements" received by Ford to date that relate to the alleged defect in the subject vehicles that were honored would be provided in the warranty section of Appendix C. Such requests that were not honored, if any, would be included in the MORS reports identified above in response to Request 2.

Request 5

Describe in detail the search criteria used by Ford to identify the claims identified in response to Request No. 4, 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) 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 numbers were included in this search regardless of labor operation or problem codes. The resulting claims were searched using the criteria as described in Appendix B and then reviewed individually for allegations that may relate to tailgate support cable breakage.

The standard new vehicle warranty coverage for 1998-2004 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 components is provided in Appendix F (file: 2005-07-29_Appendix_F) 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 6

List all tailgate support cable part number(s) or the part number of subassemblies containing a tailgate support cable which were sold as replacement parts for the vehicles listed in response to Request No 1, and state the quantity of each aftermarket or replacement tailgate support cable that Ford has sold by year from 1998 to the present.

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 identifying in electronic form in Appendix G (file: 2005-07-29_Appendix_G) on the enclosed CD the total number of Ford service replacement tailgate support cable assemblies sold by part number (both service and engineering) and calendar month and year of sale where available.

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