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10/2/06

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September 27, 2006

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

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NHTSA

Dear Ms. DeMeter:

Subject: EA05-017

The Ford Motor Company (Ford) response to the agency's August 28, 2006, letter requesting information concerning steering knuckles on certain Ford 4x4 trucks and sport utility 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



FORD MOTOR COMPANY (FORD) RESPONSE TO EA05-017

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. 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 September 19, 2006 telephone conversation, Peter Kivett of your staff informed Ford personnel that the scope of the investigation is 2003 and 2004 model year F-250 4x4 and Excursion 4x4 vehicles.

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 September 15, 2006. Ford has searched within the following offices for responsive documents: Environmental and Safety Engineering, Ford Customer Service Division, Quality, Office of the General Counsel, and North American Truck Product Development.

Request 1

State the population for the subject peer vehicles by model and model year.

Answer

Ford records indicate that 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 335,222.

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

Model	2003 MY	2004 MY
Excursion 4x4	19,178	16,638
F-250 4x4	144,847	154,559

Request 2

State the number and provide copies of all of the following information that relates or potentially relates to the subject condition in the subject vehicles. This should include all information in Ford's possession or control or of which it is otherwise aware:

- a. owner complaints;
- b. repair shop claims;
- c. field reports;
- d. crash/injury incident reports;
- e. subrogation claims;
- f. lawsuits; and
- g. Third-party arbitration proceedings where Ford is a party to the arbitration.

List and collate your response separately for each category ("a" through "g") by date the incident was filed with Ford. Provide for each item in this response the incident date, model, model year, wheel size, problem code, vehicle identification number, repair mileage, property damage, and injuries.

For "d," identify all crashes by date, location, and names of parties involved. For "f," identify all the lawsuits by caption, court, and docket number. Provide a separate analysis and description of each item "e" through "g" identifying the vehicle (by model year, build date, and VIN) and the vehicle owner (by name, address, and telephone number). Include all police reports that relate to the subject condition known to Ford. Clearly describe the sequence of events leading up to any accident(s), the approximate vehicle speed, approximate vehicle mileage, and any personal injuries, vehicle damage, or property damage that may have occurred.

Answer

For purposes of identifying reports of incidents that may be related to the subject condition 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, the Fleet Test Database systems, and the criteria used to search each of these are provided electronically in Appendix B (filename: 2006-09-27 Appendix B) on the enclosed CD.

The following categorization was used in the review of reports located in each of these searches:

Category	Allegation
A	Steering Knuckle Failure

Owner Reports: Records identified in a search of the Master Owner Relations Systems (MORS) database, as described in Appendix B, were reviewed for relevance. There were no identified reports of incidents that relate or potentially relate to the subject condition.

Legal Contacts: Ford is providing in Appendix B a description of Legal Contacts and the activity that is responsible for this information, Litigation Prevention. There were no responsive owner reports that relate or potentially relate to the subject condition and, accordingly, there are no related files from Litigation Prevention.

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 category described above. One potentially relevant field report was identified in this search that may relate to the agency's peer investigation. A copy of the report is provided in the CQIS portion of the electronic database contained in Appendix C on the enclosed CD.

Crash/Injury Incident Claims: For purposes of identifying allegations of accidents or injuries that may have resulted from the subject condition, Ford has reviewed the potentially responsive field report. This field report alleges an accident resulted from the tie rod mounting hole breaking off the knuckle assembly during a high speed turn. A search of owner reports, lawsuits, and claims found no related contacts corresponding to this alleged incident. This report is provided in the CQIS portion of the electronic database contained in Appendix C on the enclosed CD.

Claims, Lawsuits, and Arbitrations: For purposes of identifying incidents that may relate 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.

Lawsuits and claims gathered in this manner were reviewed for relevance. There were no lawsuits or claims that relate or potentially relate to the subject condition.

### Request 3

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 subject condition for the subject peer Platform: warranty claims; extended warranty claims; claims for good will services that were provided; field, zone, or similar adjustments and reimbursements; and warranty claims or repairs made in accordance with a procedure specified in a technical service bulletin or customer satisfaction campaign.

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

- a. Ford's claim number;
- b. Vehicle owner or fleet name (and fleet contact person) and telephone number;
- c. VIN;
- d. Repair date;
- e. Vehicle mileage at time of repair;
- f. Repairing dealer's or facility's name, telephone number, city and state or ZIP code;
- g. Labor operation number;
- h. Problem code;
- i. Replacement part number(s) and description(s);
- j. Whether the vehicle was towed to the dealer for the repair (y/n);
- k. Secondary component damage (y/n) – Whether there were coincident repairs to secondary components that can be damaged when steering knuckle fracture

occurs. For example, repairs to the following components at the same front wheel position as the subject component on or about the same date as the subject component repair ( $\pm 2$  days): brake rotor, brake hose, axle (four-wheel drive), body damage, tie rod, etc. (state the specific criteria used by Ford);

- i. Concern stated by customer; and
- m. Comment, if any, by dealer/technician relating to claim and/or repair.

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

#### Answer

Records identified in a search 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. Three potentially relevant warranty claims were identified in this search that may relate to the agency's peer investigation and are provided in the AWS portion of the electronic database contained in Appendix C (filename: 2006-09-27 Appendix C) on the enclosed CD. The categorization of each report is identified in the "Category" field.

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