

*Ford Motor Company*

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*8/29/05*

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

August 24, 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: PE05-038:NVS-213swm


The Ford Motor Company (Ford) response to the agency's July 13, 2005 letter concerning reports of alleged interference between the floor carpet and the accelerator pedal in 2003 through 2004 model year Mustang SVT Cobra vehicles is attached.

While Ford has received a number of reports of accelerator pedal contact with the carpet, the majority describe intermittent contact but do not allege that the pedal would not return on its own. Further, the majority of customers who experienced carpet contact with the pedal elected to bring their vehicle in for repair when the condition was experienced.

During the course of its investigation, Ford has identified several causes that could intermittently affect ability of the pedal to return to its nominal position, including bracket deformation due to pedal overload or improper use of aftermarket floor mats. While a few reports describe a pedal stuck in a wide open throttle position, we note that Mustang SVT Cobras are equipped with a manual transmission that provide the driver the ability to quickly disengage the engine from the drive train by shifting into neutral and bringing the vehicle to a controlled stop. Furthermore, the pedal could only stick in the wide open position if the operator had already desired full throttle acceleration and had initially fully depressed the pedal. Typically an operator would not be expected to use wide open throttle acceleration in inappropriate areas, such as parking lots. Based on the above, Ford does not believe there is an unreasonable risk to motor vehicle safety.

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

Sincerely,

  
James P. Vondala

Attachment



**FORD MOTOR COMPANY (FORD) RESPONSE TO PE05-038**

Ford's response to this Preliminary Evaluation (PE) 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 a substantial effort to provide thorough and accurate information, and we would be pleased to meet with agency personnel to discuss any aspect of this PE.

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.

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 July 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, Quality, Global Core Engineering, Office of the General Counsel, Vehicle Operations, 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. Date of manufacture;
- c. Date warranty coverage commenced; and
- d. The State in the United States where the vehicle was originally sold or leased (or delivered for sale or lease).

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

Answer

Ford records indicate that the approximate total number of 2003-2004 model year Mustang SVT Cobra 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 18,216.

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

Model	2003 MY	2004 MY
Mustang SVT Cobra	12,973	5,243

The requested data for each subject vehicle is provided electronically in Appendix A (filename: 2005-08-24\_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:

- 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; 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).

In addition, for items "c" 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. For items "e" and "f," 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: 2005-08-24\_Appendix\_B) on the enclosed CD.

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

Category	Allegation
A	Carpet/floor mat interference with accelerator pedal
B	Non-specific accelerator pedal or carpet complaint

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 is provided electronically in Appendix C1 (filename: 2005-08-24\_Appendix\_C1) 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 C1. The categorization of each report is identified in the "Category" field. Ford operates a separate SVT Hotline specifically for SVT vehicle owners. A search of the SVT Hotline database for potentially responsive records was conducted, as described in Appendix B. Records identified were reviewed for relevance and categorized in accordance with the categories described above. These reports are provided in Appendix C2 (filename: 2005-08-24\_Appendix\_C2) on the enclosed CD.

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 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 relating to one responsive owner report involving VIN 1FAFP48Y54F [REDACTED] were located. Those documents are provided electronically in Appendix D (filename: 2005-08-24\_Appendix\_D). There was one potentially relevant. This report alleges unexplained acceleration of a vehicle that resulted in impact with a shopping cart corral, presumably in a parking lot where a wide open throttle operation would not normally be expected. The servicing dealership concluded the accelerator pedal interference resulted from installation of non-Ford floor mats.

**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 C1 on the enclosed CD. Copies of these categorized field reports are provided in the CQIS portion of the electronic database also contained in Appendix C1. 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 Appendices C1 and C2 but are not included in the field report count provided in those appendices.

**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, Ford searched UDB for reports responsive to Request 2 as described in Appendix B. No responsive UDB reports were identified.

**VOQ Data:** This information request had an attachment that included 13 Vehicle Owner's Questionnaires (VOQs). On July 19, 2005, the agency provided an additional 15 VOQs. Four of these VOQs were outside of the subject vehicle population. 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. Of the 24 VOQs that pertain to the subject vehicle population, Ford has identified five that were duplicative of warranty claims, owner reports, or field reports. Any reports located on a vehicle identified in the VOQs that relate to the alleged defect are included in the MORS and CQIS portions of the electronic database provided in Appendix C1 and have been identified by a "Y" in the "VOQ Dup" field. Ford notes that one VOQ (10128850) did not contain sufficient vehicle information that could be used in a search of Ford files for related reports.

**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. A chart listing two potentially responsive allegations is being provided electronically as Appendix E (filename: 2005-08-24\_Appendix\_E) on the enclosed CD. Copies of corresponding reports are provided in the MORS and CQIS portions of the electronic database provided in Appendix C1.

**Claims, Lawsuits, and Arbitrations:** For purposes of identifying incidents that may relate to the alleged defect, Ford has gathered claim and lawsuit information maintained by Ford's Office of General Counsel (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 2, state the following information:

- a. Ford's file number or other identifier used;
- b. The category of the item, as identified in Request 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 mileage at time of incident;
- f. Incident date;
- g. Report or claim date;
- h. Whether a crash is alleged;
- 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 2000, or a compatible format, entitled "REQUEST NUMBER TWO DATA." See Enclosure 1, Data Collection Disc, for a pre-formatted table which provides further details regarding this submission.

### Answer

Ford is providing owner and field reports in the electronic database contained in Appendices C1 and C2 on the enclosed CD in response to Request 2. To the extent information sought in Request 3 is available for owner and field reports, it is provided in the database.

### Request 4

Produce copies of all documents related to each item within the scope of Request 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 Appendices C1 and C2 on the enclosed CD in response to Request 2.

### 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 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. Concern stated by customer; and
- k. 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 and review 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 review is provided in Appendix C1 on the enclosed CD. Copies of these categorized warranty claims are provided in the AWS portion of the electronic database also contained in Appendix C1. 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 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 C1 but are not indicated in the report count above.

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 provided 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 C1.

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.

#### Request 6

Describe in detail the search criteria used by Ford to identify the claims identified in response to Request 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) 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 2003-2004 model year Mustang SVT Cobra 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. The details of the various plans are provided electronically in Appendix F (filename: 2005-08-24\_Appendix\_F) on the enclosed CD. As of the date of the information request, 3,935 new vehicle ESP policies had been purchased on 2003-2004 model year Mustang SVT Cobra vehicles.

#### 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 office, or field offices pertaining, at least in part, to accelerator pedal interference of 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 not identified any TSBs or SSMs that may relate to the alleged defect in the subject vehicles.

**Internal Service Messages:** Ford has identified one ISM that relates to carpet fit in the subject vehicles and is providing a copy of it electronically in Appendix G (filename: 2005-08-24\_Appendix\_G) on the enclosed CD.



**Field Review Committee:** Ford has not identified any 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 providing the responsive non-confidential Ford documentation in Appendix H (file: 2005-05-03\_Appendix\_H).

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

Ford is submitting additional responsive documentation as Appendix I with a request for confidentiality under separate cover to the agency's Office of the Chief Counsel pursuant to 49 CFR, Part 512.

**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. Include in your response a detailed description of the subject components used in MY 2005 subject models and all differences between those vehicles and the subject vehicles that may relate to the alleged defect. 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 as Appendix J (file: 2005-08-24\_Appendix\_J) on the enclosed CD.

The throttle on the subject vehicles is controlled by the accelerator cable, which is connected to the accelerator pedal and shaft. The accelerator cable mechanically operates the throttle of the engine in response to throttle pedal movements initiated by the driver. The 2005 model year system differs significantly from the mechanical system used in the 2003 and 2004 model year vehicles. For the 2005 model year Mustang, the accelerator control has been totally redesigned and incorporates an electronic throttle control system that consists of two components: an accelerator pedal and an electronic sensor assembly. The engine management system electronically operates the throttle of the engine in response to throttle pedal movements initiated by the driver. For the 2005 model year Mustang, the carpeting has been redesigned to fit an entirely new body sheet metal design.

#### Request 10

Describe all actions Ford has taken to address complaints of accelerator pedal-carpet interference in the subject vehicles, including all instructions or advice regarding how to address the concern in vehicles in which the condition was reported. Provide the following additional information concerning Ford's response to reported incidents of the alleged defect:

- a. State whether Ford is aware of any incident vehicles in which the carpeting was cut to address concerns with accelerator pedal-carpet interference in any subject vehicles;
- b. State whether Ford has instructed or advised dealer service personnel or consumers to cut carpeting in the vicinity of the accelerator pedal in any subject vehicles to address concerns with pedal-carpet interference; and
- c. If Ford has so instructed or advised, explain the reasons why.

#### Answer

Ford reviewed its databases for reports where the carpeting was cut to address allegations of accelerator pedal-carpet interference. One responsive AWS claim (VIN: 1FAPP48Y84F[REDACTED]) indicated the technician cut the carpet to address the complaint. In one MORS III report (VIN: 1FAPP48Y84F[REDACTED]), the customer reported that he was going to cut the carpet himself without recommendation by Ford. In one CQIS report (VIN: 1FAPP48Y84F[REDACTED]), the customer had his vehicle initially serviced for a jammed accelerator pedal at which time the

carpet was repositioned. Upon experiencing the condition again the customer advised that he was going to cut the carpet on his own to eliminate the condition.

Ford reviewed SSMs, TSBs and ISMs for any service instructions that might direct a technician to cut or remove the carpet to address an accelerator pedal-carpet interference condition. The SVT Hotline was also contacted and questioned whether such instruction was provided for these types of reports. Ford found that no such instructions were provided.

Ford notes that five of the VOQs supplied by the agency indicate that the customer had cut the carpet to alleviate the interference (ODI: 10125548, 10126983, 10128668, 10129035, 10128709). None of the reports indicate the dealer service technicians performed this operation.

#### Request 11

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
- f. The reports included with this inquiry.

#### Answer

##### Report Analysis

The reports that were identified in Ford's investigation into this subject describe a variety of conditions pertaining to accelerator pedal and carpet interaction. The majority of reports simply describe some type of intermittent contact with the carpet, in some cases affecting the accelerator pedal movement. A few reports allege that carpet interference with an accelerator pedal resulted in a wide-open throttle condition. Some of the alleged interferences result from aftermarket floor mats installed in the vehicles and excessive loading of the accelerator pedal.

Ford analyzed the 77 warranty claims provided in this response to determine what types of repairs were performed to eliminate the complaints. Seventeen of the 77 vehicles were repaired via accelerator pedal replacement due to accelerator pedal arm deformation - most likely due to excessive customer loading. For example, through discussion with the servicing dealer regarding one vehicle (VIN: 1FAFP48YX4F [REDACTED]) we found that the accelerator pedal had been deformed toward the transmission tunnel and was replaced. Following this replacement, the customer returned shortly thereafter having again deformed the pedal assembly. With such deformation the pedal could be forced nearer to the tunnel area where the pedal might contact the carpet on the side of the tunnel during its sweep. This condition would be readily noticeable to a vehicle operator and would be unlikely to result in an inability of the pedal to return completely to its nominal position without significant and continuous overloading and deformation.

Customer modifications were also found to play a role in the reports of accelerator pedal to carpet interaction. For example, the servicing dealer for VIN 1FAFP48Y64F [REDACTED] noted that the customer installed three layers of floor mat or carpeting (the standard Ford floor mat, a

rubber mat, and a piece of carpeting) in the driver foot well area. This condition would significantly increase the potential for the pedal to contact the carpeting.

#### Vehicle Review

Ford was able to locate a few subject vehicles within its fleet for review of the accelerator pedal package. Some of the vehicles exhibited no carpet contact with the accelerator pedal through the range of pedal motion, while others exhibited a limited amount of carpet contact. In each vehicle that exhibited some type of contact however, we were unable to position the pedal such that the carpet could retain it and not return the pedal to its a nominal position.

All Mustang SVT Cobra vehicles are equipped with a manual transmission. Instances in which the accelerator pedal alleged to have stuck at full throttle could only do so if an operator had already desired full throttle acceleration and had fully depressed the pedal. In the event that a customer experiences a jammed accelerator pedal that does not return completely to its nominal position on its own, the customer can simply keep the vehicle from accelerating by depressing the clutch pedal to disengage the engine from the transmission, shift into neutral and bring the vehicle to a controlled stop. Under these conditions, the power steering and power brakes remain fully functional and the engine RPM will simply increase to the limiter.

#### Vehicle Owner Questionnaire (VOQ) Review

The agency provided 13 VOQs with its July 13 information request. On July 19, 2005, the agency provided an additional 15 VOQs alleging accelerator pedal interference. Ford notes that four of these 28 VOQs (10128590, 10128592, 10128602, 10128601) are not part of the subject vehicle population.

Ford believes a significant number of the 24 VOQ reports associated with this information request resulted directly from an SVT enthusiast website where postings encouraged readers to submit reports to NHTSA pertaining to this subject. We note that five of the 24 VOQs concern incidents had occurred from 8 months to 30 months before the customer submitted a report to the agency. Also of note is that 17 of the remaining 24 VOQ incidents on the 2003 and 2004 model year vehicles were reported to have occurred in May, June or July of 2005. Though these VOQs typically allege some type of accelerator pedal interference, the vast majority of the VOQs have no previous report history with Ford. A search of Ford's databases found that only five of these customers had previously contacted Ford regarding their concerns. As all of the VOQ vehicles that pertain to this inquiry would still be expected to be covered under Ford's 3 year/36,000 mile bumper-to-bumper warranty, it is reasonable to expect that a customer would bring their vehicle in to the dealership for repair if the condition was of notable concern.

#### Accident and Injury Allegations

Ford has identified two accidents allegedly related to this subject. The CQIS report associated with VIN 1FAPP48Y14F [REDACTED] indicates that the complaint is due, in part, to deformation of the accelerator pedal towards the tunnel carpet. The customer indicates that the vehicle went into a ditch, but acknowledged that he had time to shift during the event. It is not clear whether the customer shifted into neutral to disengage the transmission from the engine, at which point the customer would still have had full brake and steering function. A MORS report pertaining to VIN 1FAPP48Y54F [REDACTED] noted a minor injury to the customer's fingers. A Litigation Prevention report related to this accident is also provided. This report mentions that the incident occurred in a parking lot where the vehicle had spun into a shopping cart corral. The servicing dealership inspected the vehicle and concluded that non-Ford floor mats had contributed to the condition.

The agency also supplied three VOQs that allege some type of accident. Two reports (ODI: 10128590 and 101286691) are not part of the subject vehicle population. One report (ODI: 10128584), was filed a year and a half after the incident and does not list any details regarding the incident. Ford searched its databases for additional information regarding this vehicle and located one unrelated CQIS report requesting a return envelope for an owner survey.

The materials collected and reviewed in response to this Information Request do not indicate a safety defect trend exists in 2003 or 2004 Mustang SVT Cobras. Ford believes the recent increase in customer complaints is due in large part to postings through SVT enthusiast websites that encouraged readers to submit complaints to the agency. Absent that unique element, the number of VOQs would be substantially less. As practically all of these vehicles are still covered by the original warranty, we believe that the vast majority of customers who have experienced some type of carpet interaction with the accelerator pedal have elected to bring their vehicles in for repair when the condition was experienced. There is no indication of a continuing, latent risk of carpet interference in the subject vehicles. Additionally, pedal overload and improper use of the aftermarket floor mats have been found to adversely affect the ability of the accelerator pedal to return to its nominal position in several of these complaints.

To the extent that a carpet to accelerator pedal interference condition has existed on some population of vehicles, the data does not indicate that it poses a risk to motor vehicle safety. In the vehicles immediately available to Ford, we were not able to duplicate a carpet interference condition that could cause the accelerator pedal to remain at wide open throttle. Our experience indicated that if there was an interference condition, it was easily overcome with a slight movement of the accelerator pedal. Additional vehicles will be evaluated to further assess the potential for the pedal to be held in place. In the unlikely event that a customer experiences a pedal that will not return to its nominal position, Mustang SVT Cobras are equipped with a manual transmission that provides the driver the ability to quickly disengage the engine from the drive train (as demonstrated in some of the reports provided) by shifting into neutral and bringing the vehicle to a controlled stop. Typically the operator would not be expected to use wide-open throttle acceleration in inappropriate areas such as parking lots. Based on the above, Ford does not believe there is an unreasonable risk to motor vehicle safety.

###