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OFFICE OF DEFECTS
INVESTIGATION

October 18, 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: RQ05-002:NVS-212cag

The Ford Motor Company (Ford) response to the agency's September 1, 2005 letter concerning reports of alleged headlamp switch knob separation from the headlamp switch on certain 2000 model year Excursion vehicles manufactured for sale or lease in the United States that were not part of Ford's safety recall 01S09 (NHTSA Recall No. 01V075) is attached.

The complete lack of reports claiming that any accident or injury occurred as the result of the "alleged defect" in over five years of operation of the subject vehicles is compelling evidence that the headlamp switch knob in the subject vehicles does not contain a defect that presents an unreasonable risk to safety. Ford recognizes that there have been numerous replacements of the headlamp switch knob in the population not included in the recall 01S09. Based on five years of service, the data clearly demonstrates that customers are able to function their headlamp switch even with a broken knob and that these conditions have not caused a single customer to suffer any safety related consequences due to the condition of the knob. Furthermore, none of the customers in these incidents identified that the condition posed any risk to motor vehicle safety.

Based on Ford's review of the VOQ's and owner reports, it is apparent that the cost of repair is a predominant customer concern. Even in those reports in which cost was not specifically mentioned, many customers inquired if the knob was eligible for free remedy under the recall, with no expression of concern for vehicle safety. Based on customer comments and vehicle service history it is apparent that the customers do not feel that the performance of the knob is impaired, because they had the repair completed at their next preventive maintenance service.



Ford conducted safety recall 01S09 based on an extremely high projected failure rate and a desire to take a preventative measure to avoid any potential, but unproven safety risk. As stated in our March 2, 2001 Part 573 notification to the agency, we did not believe the condition presented an unreasonable risk to motor vehicle safety. Now, years of real world experience has shown that we were correct in our assessment that fracture of the knob does not present an unreasonable risk of accident or injury.

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 RQ05-002

Ford's response to this Recall Query (RQ) 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 Recall Query.

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 September 1, 2005, the date of your inquiry. Ford has searched within the following offices for responsive documents: Environmental and Safety Engineering, Global Core Engineering, Office of the General Counsel, Ford Customer Service Division and North American Truck Product Development.

Request 1

State the number of MY 2000 Ford Excursion vehicles Ford has manufactured for sale or lease in the United States. Separately, subtotal the subject pre-recall vehicles, recalled vehicles and post-recall vehicles. For each subject vehicles, state the following:

- a. Vehicle identification number (VIN);
- b. Model;
- c. Model Year;
- d. Date of manufacture;
- e. Whether the vehicle is part of the original recall (01V-075)
- f. Whether the recall remedy procedure was performed;
- g. Whether the headlamp switch knob was replaced;
- h. Date warranty coverage commenced
- i. The State in the United States where the vehicle was originally sold or leased (or delivered for sale or lease).

Provide the table in Microsoft Access 2000, or a compatible format, entitled "PRODUCTION DATA."

Answer

Ford records indicate that the approximate total number of 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:

Model	2000MY Population Built Prior to October 8, 1999	2000MY Recall Population	2000 MY Population Built After October 30, 1999	2000 MY Total Population
Excursion	13,287	4,107	48,006	65,400

The data for each vehicle, as requested in items a, b, c, d, e, h, and i is provided electronically in Appendix A (filename: 2005-10-18 Appendix A_Production Data) on the enclosed CD. The vehicles that are the subject of your request were not included in the original recall population; therefore, our response to e and f does not include information pertaining to those vehicles. The request in item g will be answered later in the response to Request 5.

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 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 the 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 database and the criteria used to search each of these are provided electronically in Appendix B (filename: 2005-10-18 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	Allegations of headlamp switch knob fracture and/or separation from the switch.
B	Allegations of a loose headlamp switch knob, no mention of separation from the switch.

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: 2005-10-18 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. We note that none of the responsive or ambiguous owner reports are classified as Legal Contacts. Accordingly, a search of the Litigation Prevention activity for information was not necessary and was not conducted.

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 alleged 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 field reports identified in this review that may be related to the agency's investigation 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.

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.

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.

VOQ Data: This information request had an attachment that included eight Vehicle Owner's Questionnaires (VOQs). Ford made inquiries of its MORS database for customer contacts, and its CQIS database for field reports regarding the vehicles identified on the VOQs. 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 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. Ford did not locate any lawsuits, claims or consumer breach of warranty lawsuits that relate to the alleged defect in the subject vehicles.

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. Whether a crash is alleged;
- j. Whether a fire 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 2000, or a compatible format, entitled "COMPLAINT DATA."

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.

Request 4

Produce copies of all documents related to each item within the scope of Request No. 2 and 3. 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 appendices.

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, "subsequent recall claim", or headlamp switch knob replacements made in accordance with the procedure specified in the original recall 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. Vehicle mileage at time of repair;
- f. Repairing dealer's or facility's name, telephone number, city and state or ZIP code;

- g. Whether the recall remedy procedure was previously performed;
- h. Whether the headlamp switch knob was replaced;
- i. Labor operation number;
- j. Problem code;
- k. Replacement part number(s) and description(s);
- l. Concern or statements 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."

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 pertaining to knob replacement identified in Ford's review is provided in Appendix C on the enclosed CD. Copies of these categorized warranty claims are provided in the AWS portion of the electronic database also contained in Appendix C. The categorization of each report is identified in the "Category" field. The database contains reports for the subject vehicles which were not included in the 01S09 recall; therefore, none of these vehicles had the recall remedy procedure performed.

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 provided in Appendix C.

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.

Because Ford has provided the warranty claims in an electronic database format 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. State by option (e.g., engine, transmission, etc), 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. No special warranty extensions have been issued on the subject components. The headlamp switch and knob are covered under the new vehicle three year or 36,000 mile "bumper to bumper" warranty. A description of the optional coverage plans and numbers of vehicles involved is provided electronically in Appendix D (filename: 2005-10-18 Appendix D).

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 may 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 fractured headlamp knobs in 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 did not identify any SSMs or TSBs that may relate to the alleged defect in the subject vehicles. Ford plans to issue a TSB communication to remind dealerships that the headlamp switch knob is a serviceable item and that headlamp switch assembly replacement is not necessary if the customer's concern pertains to the knob only.

Internal Service Messages: Ford did not identify any ISMs that relate to the alleged defect in the subject vehicles.

Field Review Committee: Ford did not identify any field service action communications that relate to the alleged defect in the subject vehicles. Field service action communications that relate to Ford recall 01S09 are not being provided as they relate to non-subject vehicles manufactured for sale or lease between October 8, 1999 and October 30, 1999 and are not within the scope of this inquiry. The agency has previously received copies of the materials related to 01S09 in Ford's monthly reports.

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 electronically in Appendix G (file: 2005-10-18 Appendix G) and responsive confidential Ford documentation electronically in Appendix H (file: 2005-10-18 Appendix H) on the enclosed CD. 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 H with a request for confidentiality under separate cover to the agency's Office of the Chief Counsel pursuant to 49 CFR, Part 512.

In the interests of ensuring a timely and meaningful submission, Ford is not providing documents identified as containing little substantive information. Examples of the types of documents not being produced are meeting notices, raw data lists (such as part numbers or VINs) without any analytical content, duplicate copies, and draft electronic files for which later versions of the materials are being submitted. Through this method, Ford is seeking to provide the agency with all of the substantive materials in our possession in the timing set forth for our response. We believe our response meets this goal. Should the agency request additional materials, Ford will cooperate with the request.

Request 9

Describe all modifications or changes made by, or on behalf of, Ford in the design, material composition, manufacture, quality control, supply, installation or location in the subject vehicles of the subject components, 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 as Appendix E (filename: 2005-10-18 Appendix E) on the enclosed CD.

Request 10

Produce one of each of the following:

- a. Exemplar samples of the pre-and post- recall design versions of the subject component;
- b. Field return samples of the subject component exhibiting the subject failure mode; and
- c. Functional "half-section" sample (one only) of the subject component.

Answer

Upon receipt of this inquiry and in support of this request, a request was made for field return parts from Ford dealers. Due to the short time frame available to collect and retain field return samples, we are not able to furnish field return parts that exhibit the subject alleged defect at this time. In an effort to support the agency's request, we are furnishing a knob from a recalled vehicle that is representative of a fractured knob. Due to the length of time that these vehicles have been in service, we have not been able to obtain more samples in order to fulfill your request. We are also providing a switch assembly from a later model year vehicle with a switch stem similar to that used in the subject vehicles for evaluation of the fit and function of a fractured knob. In addition, the supplier has furnished the requested "half section" parts as well as representative cutaways of the knob and mating switch stem for your review.

Request 11

State the number of headlamp switch knobs that Ford has sold subsequent to the recall notification of March 2, 2001, 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.)

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 F (filename: 2005-10-18 Appendix F) on the enclosed CD the total number of Ford service replacement knobs used on the subject vehicle and other platforms, that were sold, by calendar month and year of sale, where available. As the agency is aware, the headlamp knob was involved with campaign 01S09 launched in March 2001.

Request 12

Answer the following for the subject component;

- a) Describe the plant installation procedure. Include sketches and documentation.
- b) Identify the mating components and describe how the subject component mates to the mating components.
- c) List any tools use in production or service for installation and removal.

Answer

The headlamp switch knob is assembled onto the headlamp switch by the switch supplier prior to delivery to Ford. Once the knob is inserted onto the stem of the switch, the knob is retained by means of an interference fit with the stem as well as by a locking tab that secures it to the assembly.

There are no special tools required to service the subject headlamp knob, other than a pocket screwdriver. In order to remove the knob from the factory installed switch on the subject vehicles, the knob must be rotated to the "headlamp" function so that the knob can be pulled outward. Once pulled outward, a "window" is visible at the bottom of the knob that provides access to the stem of the switch. With the assistance of a pocket screwdriver, the locking tab on the stem can be pressed which will unlock the knob from the stem.

Request 13

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 effect(s) of the failure;
- e. The risk to motor vehicle safety that it poses;
- f. What warnings, if any, the driver would have that the alleged defect was occurring or subject component was malfunctioning;
- g. A description of the analysis process used to assess "a" through "f" and;
- h. The reports generated as a result of this inquiry.

Answer

Ford's review of the information and materials presented in this response has found no evidence that the "alleged defect" describes a condition that presents an unreasonable risk to motor vehicle safety on the subject vehicles. Rather, reports concerning the alleged defect typically relate to the cost of repair of the condition because some dealers are not aware that the knob can be replaced individually at minimal cost, but instead replace the entire headlamp switch assembly. The owner reports, field reports, and warranty claims identified in our searches concerning the alleged defect express no concern regarding safe operation of the vehicles. To further our understanding of customer concerns relating to this issue, we contacted nine dealerships regarding recent knob repairs on subject vehicles. In each case, knob replacement was just one of several repair or preventive maintenance items requested by the customer for their vehicle. This further supports our understanding that customers view a broken knob as a routine maintenance item requiring repair and not a safety defect. These customer satisfaction complaints do not describe a safety defect.

Component Review

Analysis of components returned from vehicles in service in connection with Ford's previous investigation into this subject found the predominant cause for headlamp knob separation from the switch was a fracturing of the knob material where the base of the knob attaches to the switch assembly. Should the knob material fracture in this area, the knob becomes loose but will still function the headlamp switch. If left unrepaired the knob eventually may separate from the switch stem when the driver actuates the switch. Analysis of parts previously returned from the field typically found that one of the four "cross" shaped profiles on the knob may fracture creating the looseness and/or separation leaving the remaining cross profile intact. (This can be observed on the field return knob provided in response to Request 10.) Consequently, even if a knob separates from the switch a driver may activate the headlamps simply by reinserting the knob over the switch stem and rotating the knob to the desired position. In fact, a field return knob with fracture and separation of 50% of the "cross" material could still be reinserted onto the switch and rotate the knob without difficulty. Several of the reports provided in this response indicate that customers actuated their headlamps in this fashion after the knob separated from the stem, allowing them to continue to operate the vehicle headlamps until the vehicle could be serviced.

It should be noted that a fractured knob that separates from the switch is likely to do so when a driver turns the vehicle's headlamps on or off. Should a knob separate from the switch while the vehicle is still parked, the driver will have clear indication that the headlamp knob is not functioning normally, allowing the driver to manually reinsert the knob over the switch to actuate the headlamp switch to the desired position. Should a knob separate from the switch during driving as dusk approaches, a driver again has immediate indication that the knob is not functioning normally and can pull the vehicle to a safe parking location at which time the knob can be manually reinserted to actuate the headlamp switch. In either case, the vehicle's headlamps can still be turned on.

Reports Analysis

Warranty claims provided in this response were reviewed to evaluate the types of comments or concerns expressed by customers when vehicles were brought to a dealership for repair. Review of the warranty claim comments found that most simply indicate the knob was replaced with no stated concerns from the customer regarding safe operation of the vehicle. In fact, fewer than 10% of the warranty claims even mention any resulting effect on headlamp operation resulting from a fractured knob. This is consistent with our analysis that the switch continues to be functional even with a fractured knob. It would be inaccurate to characterize a repair of a headlamp switch assembly or fractured knob as evidence of a non-functioning headlamp. Analysis of the warranty claims also found that the warranty repairs peaked around 24 months in service and then declined through the remainder of the warranty period, suggesting a declining trend.

Of the 66 owner reports provided in this response, 25 specifically relate to concerns of the cost of repair where a dealer recommended replacement of the switch rather than less expensive knob replacement. The other reports that did not specifically mention cost concerned inquiries as to whether the knob was eligible for free remedy under the recall, with no expression of concern for vehicle safety. In fact, one customer stated that he was "not too concerned about it," and had forgotten to ask the dealer about repair when the vehicle was in for unrelated service. Prior to March 2001, the headlamp knob was not available individually for service and repairs prior to this date typically required replacement of the entire headlamp switch assembly. Some dealer personnel still may be unaware that the knob for the subject vehicles can now be serviced separately from the switch and that more expensive replacement of the entire switch assembly is not necessary to simply address a knob concern. In order to address this concern Ford plans to initiate a Technical Service Bulletin to remind dealers of the availability of the knob as an individual repair option. Nevertheless, Ford believes concern for repair cost between the customer and the dealer constitutes a customer satisfaction issue rather than any type of concern related to vehicle safety.

Further, we note that Ford has not received any reports of accidents, injury allegations, property damages or lawsuits related to the alleged defect on the subject vehicles that have typically been in service for well over five years further supporting that the condition does not pose an unreasonable risk of accident or injury.

Vehicle Owner Questionnaire (VOQ) Review

The agency provided eight VOQs related to the subject vehicles and alleged defect. It is noteworthy that none of the VOQs alleged an accident or near accident as a result of any of the reported issues. The customers submitting three of the VOQs conveyed disappointment in the cost of repair as their primary concern. Four other customers primarily note that their vehicle was not covered in the previous recall, with only one of those four expressing any type of safety concern. Notably, however, this customer's May 10, 2005 contact to Ford made no reference to any safety related concern associated with the knob, but instead inquired as to eligibility for repair coverage under the recall. Rather than reporting a safety concern, it appears that owners report either a concern regarding repair cost or, similarly express disappointment that their knob is not eligible for free remedy under recall.

Recall 01S09

In March 2001, Ford Motor Company issued a voluntary recall largely based on our supplier's notification that the headlamp knob used on select platforms was made with an incorrect material. At that time, it was reported that the material used in some knobs had a higher flex modulus (less rubber content) that could cause the knobs to be more brittle and as a result the knob base may fracture. At that time Ford's switch supplier believed that nearly all knobs manufactured with the incorrect material were likely to fail. Further, the failure mode and resulting impact on knob functionality was not clear.

Ford conducted the safety recall based on an extremely high projected failure rate and a desire to take a preventative measure to avoid any potential, but unproven safety risk. As stated in our March 2, 2001 Part 573 notification to the agency, we did not believe the condition presented an unreasonable risk to motor vehicle safety. Now, years of real world experience has shown that we were correct in our assessment that fracture of the knob does not present an unreasonable risk of accident or injury.

Ford acknowledges that a larger than expected number of warranty repairs relating to knob replacement on vehicles not included in recall 01S09 have occurred. While the number of reports relating to knob concerns outside the recall population is larger than expected, the review of the reports provided in this response determined that the knob concern rates are well below the levels projected by the switch supplier at the time of the original recall. This is true even for the vehicle production months immediately following the recall timeframe where the number of reports of knob concerns is highest. Our analysis of parts returned from vehicles in service has found that knob fracture is not likely to result in loss of knob functionality. Instead, a fractured knob can still be used to actuate the headlamps, providing the customer opportunity to have the vehicle serviced.

Summary

While the condition described by the alleged defect may be a source of dissatisfaction to owners, it does not present an unreasonable risk to the safe operation of the vehicles. This is supported by the fact that there are no allegations of accidents, or even near accidents, in the population of responsive reports related to the alleged defect, on vehicles that have been in service for over five years. Although Ford recognizes that some dealers appear to be unaware as to the availability of knobs for service on the subject vehicles, which can result in customer concerns relating to cost of repair, we do not believe that these concerns are a basis for evaluating whether the matter relates to vehicle safety, particularly when evidence suggests that the operation of the Excursion's headlamp switch can be maintained as previously described.

Based on the failure mode described above, customers who experience a fractured knob are aware of the knob's condition through looseness in the knob. The switch can be operated with the fractured knob allowing a customer to make appropriate arrangements for service. Based on the observed failure mode that provides for continued switch function, the lower failure rate than was projected for knobs on the recalled vehicles, the total lack of allegations of accidents, injuries or even near accidents in the population of responsive reports in the subject vehicles that have been in service for over five years, there is no indication that the condition represents an unreasonable risk to the safe operation of these vehicles.

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