



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

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

January 26, 2007

Ms. Kathleen C. DeMeter, Director
Office of Defects Investigation Safety Assurance
National Highway Traffic Safety Administration
400 Seventh Street, S.W., Room 5326
Washington, DC 20590

Dear Ms. DeMeter:

Subject: DP06-005:NVS-211aa

The Ford Motor Company (Ford) response to the agency's December 8, 2006, letter concerning reports of alleged engine stall while driving, attributable to the fuel delivery system with the use of E85 fuel in 2003 to 2005 Taurus and Sable vehicles, is attached.

Ford has conducted an extensive search for reports of allegations of stalling while driving, attributable to the use of E85 fuel, in 2003 to 2005 model year Taurus and Sable flex fuel vehicles, and found no indication of any issue relating to stalling while driving. Ford acknowledges that some Taurus and Sable vehicles, when running on E85 fuel, may exhibit a long crank/hard start condition on the first cold start of the day. On December 6, 2006, Ford released Extended Coverage Program 06N07, for 2004 to 2006 model year Taurus and Sable vehicles, to provide a one time calibration software update of the PCM in recognition of customer concerns related to longer than expected crank time. This calibration update is effective in addressing the undesirable start up conditions experienced by some users of E85 fuel.

The absence of allegations of stalling while driving, as well as an absence of accidents and injuries, demonstrates that Ford flex fuel vehicles are capable of operating on a mixture of alternative fuel and gasoline. The release of Extended Coverage Program 06N07 shows Ford's commitment to further improve those vehicle's capabilities. The total dearth of reports associated with this condition substantiates Ford's belief that there is no condition where the subject vehicles are not capable of operating on a mixture of alternative fuel and gasoline, nor is there any related unreasonable risk to motor vehicle safety.

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

Sincerely,

James P. Vondale

Attachment



FORD MOTOR COMPANY (FORD) RESPONSE TO DP06-005

Ford's response to this Defect Petition 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 Defect Petition.

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.

Ford notes that some of the information being produced pursuant to this inquiry may contain personal information, such as customer names, addresses, telephone numbers, and complete vehicle identification numbers. Ford is producing such personal information in an unredacted form to facilitate the agency's investigation, and with the understanding that the agency will not make such personal information available to the public under FOIA Exemption 6, 5 U.S.C. 552(b)(6).

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 December 8, 2006, 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, Office of the General Counsel, and North American Car Product Development.

Request 1

State, by model and model year, the number of subject and peer vehicles Ford has manufactured for sale or lease in the United States. Separately, for each vehicle manufactured to date by Ford, state the following:

- a. Vehicle identification number (VIN);
- b. Make;
- c. Model;
- d. Model Year;
- e. Flex Fuel E-85 usage;

- f. Transmission details (manual or automatic type, and model number);
- g. Date of manufacture;
- h. Date warranty coverage commenced; and
- 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 subject and 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 882,558 (227,914 subject vehicles and 654,644 peer vehicles). While Ford has provided the number of flex fuel capable subject vehicles, it cannot determine which of those vehicles actually use E85 fuel.

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

Model	2003 MY	2004 MY	2005 MY
Taurus/Sable Flex Fuel Capable	92,598	45,109	90,207
Taurus/Sable Gas	306,397	200,435	147,812

The requested data for each subject and peer vehicle is provided electronically in Appendix A (filename: 2007-01-26 Appendix A.zip) on the enclosed CD. Each of the subject and peer vehicles were built with an automatic transmission, although Ford cannot readily determine which of the two available automatic transmissions is installed in each vehicle. Such information can be retrieved, for a specific vehicle, upon request from the agency.

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 and peer 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;
- 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 engine stall while driving that are attributable to the use of E85 fuel in subject vehicles, as well as allegations of stalling while driving in peer vehicles that are attributable to the fuel delivery system, and any related documents for either subject or peer vehicles, Ford has gathered "owner reports" and "field reports" maintained by Ford Customer Service Division (FCSD) 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 criteria used to search each of these are provided electronically in Appendix B (filename: 2007-01-26 Appendix B.pdf) on the enclosed CD.

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

Subject Vehicles:

Category	Allegation
A	Alleged stall while driving, related to fuel delivery system and use of E85.
B	Ambiguous allegation of either stall while driving, whether related to fuel delivery system, or whether E85 is being used.

Peer Vehicles:

Category	Allegation
A	Alleged stall while driving, related to fuel delivery system.
B	Ambiguous allegation of either stall while driving or if related to fuel delivery system.

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 in subject vehicles or allegations of stalling while driving, related to the fuel delivery system in peer vehicles.

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 and copies of relevant owner reports identified in this search that may relate to the agency's investigation are provided in the

MORS III portion of the electronic databases contained in Appendix C (filenames: 2007-01-26 Appendix C Flex.mdb and 2007-01-26 Appendix C Gas.mdb) on the enclosed CD. The categorization of each report is identified in the "Category" field.

When we were able to identify that 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. No responsive (i.e., not ambiguous) owner reports indicate that they are Legal Contacts.

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 and copies of relevant field reports identified in this search that may relate to the agency's investigation are provided in the CQIS portion of the electronic databases contained in Appendix C on the enclosed CD. The categorization of each report is identified in the "Category" field.

When we were able to identify that responsive duplicate field reports for an alleged incident were received, each of these duplicate reports was marked accordingly, and the group counted as one report. In other cases, certain vehicles may have experienced more than one incident and have more than one report associated with their VINs. These reports have been counted separately. In addition, field reports that are duplicative of owner reports are provided in Appendix C but are not included in the field report count.

Unified Database: The Unified Database (UDB) was created to facilitate parts availability by tracking part sales and is not intended as a problem reporting system. However, because a small percentage of the records may contain verbatim comments that could potentially relate to the agency's inquiry, we searched UDB for reports responsive to Request 2 as described in Appendix B. There were no responsive records found for either the subject or peer vehicles.

VOQ Data: This information request had an attachment that included one Vehicle Owner's Questionnaire (VOQ). Ford made inquiries of its MORS database for customer contacts, and its CQIS database for field reports regarding the vehicle identified on the VOQ. Ford located one MORS report filed by the writer of the VOQ, but the report alleges, "WHEN STARTING THE VEH WITH A COLD ENGINE, VEH REVVES UP THEN DIES-CRANKS BUT DOESN'T START WITH A COLD ENGINE-NORMALLY TAKES 3-4 TIMES OF TURNING THE KEY TO START THE VEH-HESISTATION WITH ACCELERATION WITH A COLD ENGINE ..." Because this report does not allege a condition of vehicle stall while driving, Ford has not included it with the submission of responsive and ambiguous claims.

Crash/Injury Incident Claims: For purposes of identifying allegations of accidents or injuries that may relate to the agency's investigation, Ford has reviewed responsive owner and field reports, and lawsuits and claims. One ambiguous allegation of a minor crash with no injury associated with a peer vehicle is provided in the Legal Claims / Lawsuits portion of the electronic database contained in Appendix C on the enclosed CD. The categorization of this report is identified in the "Category" field. Copies of reports corresponding to this alleged incident are provided in the

MORS and CQIS portions of the electronic database provided in Appendix C. Ford's research did not locate any potentially relevant allegations of a crash or injury associated with engine stall while driving attributable to the fuel delivery system and use of E85 fuel in the subject vehicles.

Claims, Lawsuits, and Arbitrations: For purposes of identifying incidents that may relate to the agency's investigation, 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 has also located other lawsuits, claims or consumer breach of warranty lawsuits that are ambiguous as to whether they meet the criteria. We have included these lawsuits and claims as "non-specific allegations" for your review because of the broad scope of the request. Based on our engineering judgment, the information in these lawsuits and claims is insufficient to support a determination that they pertain to the agency's investigation.

We are providing the requested detailed information, where available, on the responsive and ambiguous lawsuits and claims in the Legal Claims / Lawsuits portion of the electronic databases contained in Appendix C on the enclosed CD. The categorizations of these reports are identified in the "Category" field. To the extent available, electronic copies of complaints, first notices, or MORS reports relating to matters shown on the log are provided electronically in Appendix G (filenames: 2007-01-26 Appendix G Flex.pdf and 2007-01-26 Appendix G Gas.pdf) on the enclosed CD. With regard to these lawsuits and claims, Ford has not undertaken to contact outside law firms to obtain additional documentation.

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 property damage is alleged;
- k. Number of alleged injuries, if any; and
- l. Number of alleged fatalities, if any.
- m. Summary description of complaint, 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 databases 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 databases. To the extent information sought in Request 3 is available for lawsuits and claims, it is provided in the Legal Claims / Lawsuits portion of the electronic databases contained in Appendix C on the enclosed CD.

Request 4

Produce copies of all documents related to each item within the scope of Request No. 2. Organize the documents separately by category (i.e., consumer complaints, field reports, etc.) and describe the method Ford used for organizing the documents.

Answer

Ford is providing owner and field reports in the electronic databases contained in Appendix C on the enclosed CD in response to Request 2. Copies of complaints, first notices, or MORS reports relating to matters shown in the Legal Claims / Lawsuits portion of the electronic databases contained in Appendix C are provided in Appendix G. 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, replacement of the subject component in the subject and peer 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."

In addition to the total counts requested above, provide Ford's assessment, by model and model year, of the number of claims within each of the counts given that relate to, or may relate to, the alleged defect.

Answer

Records identified in a search of the AWS database, as described in Appendix B, were reviewed for relevance and categorized in accordance with the categories described in the response to Request 2. The number and copies of relevant warranty claims identified in this search that may relate to the agency's investigation are provided in the AWS portion of the electronic databases contained in Appendix C (filenames: 2007-01-26 Appendix C Flex.mdb and 2007-01-26 Appendix C Gas.mdb) on the enclosed CD. 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 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 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 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 included in the MORS reports identified above in response to Request 2. Such claims that were honored are included in the warranty data provided.

Ford's assessment of the number of claims within each of the counts will be discussed in Ford's response to Request 9.

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 to 2005 model year Taurus and Sable (subject and peer) 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 available plans, as well as the number of vehicles under each plan, are provided electronically in Appendix H (filename: 2007-01-26 Appendix H.pdf) on the enclosed CD.

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. Additionally, please furnish an electronic listing of subject vehicles (VINs and service dates) that have received the software remedy described in Ford TSB 06-5-5 (enclosed).

Provide this information in Microsoft Access 2000, or a compatible format, entitled "TSB DATA."

Answer

For purposes of identifying communications to dealers, zone offices, or field offices pertaining to stalling while driving, attributable to the use of E85 fuel in 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, ISMs, and the Field Review Committee files and the search criteria used are provided in Appendix B.

OASIS Messages: Ford has identified no SSMs and no TSBs that may relate to the alleged defect in the subject vehicles. Ford notes that TSB 06-05-05, Flex Fuel – Long Crank/Hard Start (a copy which was included with this information request) was published February 27, 2006, to address cold start conditions on 2004 to 2006 Taurus and Sable flex fuel vehicles operating on E85 fuel.

Internal Service Messages: Ford has identified no ISMs that may relate to the alleged defect in the subject vehicles. However, Ford found two ISMs that relate to start or driveability conditions, including stalling, but are not linked to use of E85 fuel in subject vehicles. One communication requests engineering contact for hard start/stall/stumble conditions in either subject or peer vehicles and another provides technician assistance for stalls/quits, crank/no start, no fuel pressure conditions in subject or peer vehicles. Copies of the ISMs are provided electronically in Appendix I1 (filename: 2007-01-26 Appendix I1.pdf) on the enclosed CD.

Field Review Committee: Ford has identified no field service action communications that may relate to the alleged defect in the subject vehicles. However, Ford notes that Extended Warranty Coverage Program 06N07, was issued December 6, 2006, to address a hard start

January 26, 2007

condition in 2004 to 2006 Taurus and Sable vehicles operating on E85 fuel. A copy of the Extended Warranty Coverage Program is provided electronically in Appendix I2 (filename: 2007-01-26 Appendix I2.pdf) on the enclosed CD.

As requested by the agency, Ford is furnishing an electronic listing of subject vehicles (VINs and service dates) that have received the software remedy described in Ford TSB 06-5-5 in Appendix I (filename: 2007-01-26 Appendix I3.xls).

Request 8

Provide a list of the five largest fleets of subject vehicles in each of the following regions listed below. For each fleet identified, furnish a contact name, telephone number and business address.

- a. Minnesota;
- b. Illinois;
- c. Iowa;
- d. Nebraska; and
- e. Wisconsin.

Answer

The names and contact addresses of large fleets of subject vehicles are provided in Appendix J (filename: 2007-01-26 Appendix J.pdf). Ford is unable to verify with certainty if the listed fleets are the five largest in each of the five states. Ford also notes that it cannot determine which of the vehicles actually use E85 fuel.

Request 9

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;
- f. The report included with this inquiry;
- g. Engine stall event alleged within the petition, and
- h. The ability to restart a vehicle that has experienced engine stall while driving during E-85 fuel usage;

Answer

Ford has conducted an extensive search for reports of allegations of stalling while driving, attributable to the use of E85 fuel, in 2003 to 2005 model year Taurus and Sable flex fuel vehicles, and found no indication of any issue relating to stalling while driving. Ford found only one claim in which the customer alleged "Possible E85 issue dies at stops." This vehicle was repaired by replacement of the idle air control valve and powertrain control module. Nothing specifically attributable to use of E85 fuel was found to be the cause of this complaint. Ford has also provided claims of stalling in the subject vehicles when it is unclear whether the claims relate to an allegation of stall while driving, to the fuel delivery system, or to usage of E85

fuel. Ford notes that vehicles stall for a wide variety of reasons and it is likely that these reports were in fact the result of a concern caused by some other factor. For example, in a review of 97 warranty claims in which some type of vehicle stall while driving was alleged, Ford found that all were reported to be related to some factor other than use of E85 fuel, such as PCM assembly, air induction system, or miscellaneous electrical issues.

Ford acknowledges that some Taurus and Sable vehicles, when running on E85 fuel, may exhibit a long crank/hard start condition on the first cold start of the day. The VOQ provided with this information request alleges such a condition, but does not, on its face, allege stalling while driving. On December 6, 2006, Ford released Extended Coverage Program 06N07, for 2004 to 2006 model year Taurus and Sable vehicles, to extend the warranty coverage for the Powertrain Control Module (PCM) calibration to 10 years of service or 100,000 miles from the warranty start date of the vehicle, whichever occurs first. This additional coverage provides a one time calibration software update of the PCM in recognition of customer concerns related to longer than expected crank time. This calibration update is effective in addressing the undesirable start up conditions experienced by some users of E85 fuel.

As requested by the agency, Ford also searched for allegations of stall while driving, related to the fuel system, for peer 2003 to 2005 model year Taurus and Sable gasoline fueled vehicles. Ford notes that the number of reports, even on these peer vehicles, is low. The majority of these reports are ambiguous whether they relate to a stall while driving due to the fuel delivery system. As with the subject vehicles, further review found that many were remedied by service of components other than the fuel delivery system.

Ford notes that no allegations of accidents or injuries were found in the reports relating to the subject vehicles. The absence of allegations of stalling while driving demonstrate that Ford flex fuel vehicles are capable of operating on a mixture of alternative fuel and gasoline. The release of Extended Warranty Coverage Program 06N07, to address customer concerns with longer than expected crank times, shows Ford's commitment to further improve those vehicle's capabilities. The total dearth of reports associated with this condition substantiates Ford's belief that there is no condition where the subject vehicles are not capable of operating on a mixture of alternative fuel and gasoline, nor is there any related unreasonable risk to motor vehicle safety.