



JUL-6

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June 29, 2007

Ms. Kathleen C. DeMeter, Director
Office of Defects Investigation Safety Assurance
National Highway Traffic Safety Administration
1200 New Jersey Avenue, SE
Room W45-302
Washington, DC 20590

Dear Ms. DeMeter:

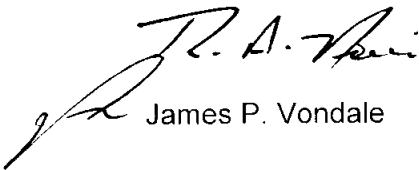
Subject: EA06-020:NVS-212mjl

The Ford Motor Company (Ford) response to the agency's May 24, 2007, letter concerning reports of alleged unexpected closing of the power liftgates in 2004 through 2006 model year Ford Freestar and Mercury Monterey vehicles is attached. We understand these vehicles are being used as a peer comparator in the agency's investigation EA06-020.

As the agency is aware, Ford announced a voluntary safety recall (06S42) in March, 2006, involving 2005 and certain 2006 model year Ford Freestar and Mercury Monterey vehicles equipped with a power liftgate. Customers were instructed to bring their vehicles to a Ford or Lincoln/Mercury dealer to have the Power Liftgate Control Module reprogrammed to sound an audible warning and control lowering of the liftgate to the closed position should the struts have inadequate strength to hold the liftgate open. Prior to the recall service, the liftgate could fall freely to the closed position with no prior warning. Reports provided in response to this peer vehicle information request include those reports that led to Ford's decision to conduct the recall.

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 EA06-020

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

The scope of Ford's investigation conducted to locate responsive information focused on Ford employees most likely to be knowledgeable about the subject matter of this inquiry and on review of Ford files in which responsive information ordinarily would be expected to be found and to which Ford ordinarily would refer, as more fully described in this response. Ford notes that although electronic information was included within the scope of its search, Ford has not attempted to retrieve from computer storage electronic files that were overwritten or deleted. As the agency is aware, such files generally are unavailable to the computer user even if they still exist and are retrievable through expert means. To the extent that the agency's definition of Ford includes suppliers, contractors and affiliated enterprises for which Ford does not exercise day-to-day operational control, we note that information belonging to such entities ordinarily is not in Ford's possession, custody or control.

Ford has construed this request as pertaining to vehicles manufactured for sale in the United States, its protectorates and territories.

As the agency is aware, Ford announced a voluntary safety recall (06S42) in March, 2006, involving 2005 and certain 2006 model year Ford Freestar and Mercury Monterey vehicles equipped with a power liftgate. Customers were instructed to bring their vehicles to a Ford or Lincoln/Mercury dealer to have the Power Liftgate Control Module reprogrammed to sound an audible warning and control lowering of the liftgate to the closed position should the struts have inadequate strength to hold the liftgate open. Prior to the recall service, the liftgate could fall freely to the closed position with no warning. Reports provided in response to this peer vehicle information request include those reports that led to Ford's decision to conduct the recall.

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 May 24, 2007, the date of your inquiry. Ford has searched within the following offices for responsive documents: Environmental and Safety Engineering, Ford Customer Service Division, Office of the General Counsel, 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. Make;
- b. Model;
- c. Model Year;
- d. Vehicle identification number (VIN);
- e. Date of manufacture;
- f. Date warranty coverage commenced.; and
- g. 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 I, 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 peer 2004 through 2006 model year Ford Freestar and Mercury Monterey vehicles equipped with power liftgates 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 13,999.

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

| Model | 2004 MY | 2005 MY | 2006 MY |
|------------------|---------|---------|---------|
| Ford Freestar | 4 | 4967 | 3975 |
| Mercury Monterey | 1 | 3070 | 1982 |

The requested data for each subject vehicle is provided electronically in Appendix A (filename: 2007-06-29 Appendix A) on the enclosed CD.

Request 2

State the number of each of the following, received by Ford, or of which Ford is otherwise aware, which relate to, or may relate to, the subject condition in the subject peer vehicles, by model and model year:

- 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 peer 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).

Answer

For purposes of identifying reports of incidents that may be related to this subject and any related documents, 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: 2007-06-29 Appendix B) on the enclosed CD.

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

Alleged failure or malfunction of the liftgate struts, their attachment components or mounting brackets, unexpected closing of the liftgate, or liftgate does not open properly or remain open properly.

| Category | Population |
|----------|---|
| A1 | Report related to a vehicle within the recall 06S42 population that predates the recall remedy on that vehicle. |
| A2 | Report related to a vehicle within the recall population in which the vehicle was repaired in accordance with the recall prior to the reported concern. |
| A3 | Report related to a vehicle outside the recall population. |

Owner Reports: Records identified in a search of the Master Owner Relations System (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 peer investigation are provided in the MORS III portion of the electronic database contained in Appendix C (filename: 2007-06-29 Appendix C) on the enclosed CD. The categorization of each report is identified in the "Category" field.

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 owner reports indicate that they are Legal Contacts, Ford has gathered the related files from the Litigation Prevention section. Non-privileged documents for files that were located that are related to the responsive owner reports are provided electronically in Appendix D (filename: 2007-06-29 Appendix D).

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 peer investigation are provided in the CQIS portion of the electronic database 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 owner or 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 report count above.

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 identifying potentially relevant allegations is being provided electronically as Appendix E (filename: 2007-06-29 Appendix E) on the enclosed CD. Copies of reports corresponding to these alleged incidents are provided in the MORS, CQIS, and Analytical Warranty System (AWS) portions of the electronic database provided in Appendix C.

Ford identified five reports with allegations of an injury resulting from unexpected closing of the power liftgate due to strut failure. Three relate to incidents that occurred prior to Ford's recall. The remaining two reports (VIN: 2FMZA58255BA00553 and 2MRDA232X5BJ03680) relate to incidents that occurred after the recall notifications were mailed but before the vehicles had been taken to a dealership for the remedy. There are no alleged injuries related to vehicles not included in Ford's recall.

Claims, Lawsuits, and Arbitrations: Ford has identified no claims, lawsuits or arbitrations that relate or may relate to the subject vehicles with alleged the defect.

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 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 preformatted table which provides further details regarding tiffs submission.

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

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 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." See Enclosure 1, Data Collection Disc, for a pre-formatted table which provides further details regarding this submission.

Answer

Records identified in a search of the AWS database, as described in Appendix B, were reviewed for relevance and categorized in accordance with the 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 peer investigation are provided in the AWS portion of the electronic database contained in Appendix C (filename: 2007-06-29 Appendix C) 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.

Request 5

Describe in detail the search criteria used by Ford to identify the claims identified in response to Request No. 4, including the labor operations, problem codes, part numbers and any other pertinent parameters used. Provide a list of all labor operations, labor operation descriptions, problem codes, and problem code descriptions applicable to the alleged defect in the subject vehicles. State, by make and model year, the terms of the new vehicle warranty coverage offered by Ford on the subject vehicles (i.e., the number of months and mileage for which coverage is provided and the vehicle systems that are covered). Describe any extended warranty coverage option(s) that Ford offered for the subject vehicles and state by option, model, and model year, the number of vehicles that are covered under each such extended warranty.

Answer

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 2004 through 2006 model year Ford Freestar and Mercury Monterey 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: 2007-06-29 Appendix F) on the enclosed CD. As of the date of the information request, approximately 32,000 new vehicle ESP policies that provide coverage for liftgate struts and the optional power liftgate mechanism (if equipped) had been purchased on 2004 through 2006 model year Ford Freestar and Mercury Monterey vehicles.

Request 6

Describe the design and operation of the power liftgate feature in the subject peer vehicles including any built-in safety and failsafe features.

Answer

The optional power liftgate system on Freestar and Monterey vehicles can be actuated using the overhead console button, the key fob button, the outside release handle or the liftgate trim mounted switch. The power liftgate controls will operate without having the key in the ignition. When the key is in the ignition and in the "On" position, the transaxle must be in "Park" to power operate the liftgate. When the liftgate is power closed, a chime will sound three times before the liftgate begins to power close. A single chime indicates some type of problem with the power close function.

The customer has the option to manually operate the power liftgate by activating the power door lockout control located in the overhead console. With the control in the "Off" position, power operation is disabled from the liftgate handle and from the liftgate trim switch. The overhead console switch and key fob will operate the liftgate regardless of the position of the lockout switch. To operate the power liftgate manually, the customer needs to disable the liftgate power function by placing the Power Door Lockout Control in the "Off" position. The liftgate can then be manually operated.

If the power liftgate encounters a solid obstacle while opening, it will stop. Ford directs the customer to close the liftgate manually and remove the obstruction. The liftgate can then be opened under power. If the power liftgate encounters an obstacle while closing, it will reverse to the full open position. Once the obstacle is removed, the liftgate can again be closed under power.

Ambient temperature may affect the performance of the power liftgate function. For example, when operating the power liftgate at temperatures below 32°F (0°C), the power liftgate may stop up to five inches from the full open position. The power liftgate can be fully opened by pushing it upward to the maximum open position. Ford recommends manual operation of the power liftgate in extreme cold conditions -40 °F (-40 °C), or on extreme inclines in the vehicle Owner Guide.

The power liftgate system will also inform the customer when the liftgate is not fully latched by displaying a Liftgate Ajar message on the instrument panel. A detailed description of the components of the Power Liftgate System summarized from the 2005 Ford Freestar Service Manual is enclosed for your review in Appendix G (filename: 2007-06-29 Appendix G).

As noted above, Ford announced a voluntary safety recall (06S42) in March, 2006, involving 2005 and certain 2006 model year Ford Freestar and Mercury Monterey vehicles equipped with a power liftgate. Customers were instructed to bring their vehicles to a Ford or Lincoln/Mercury dealer to have the Power Liftgate Control Module reprogrammed to sound an audible warning and control lowering of the liftgate to the closed position should the struts have inadequate strength to hold the liftgate open. Prior to the recall service, the liftgate on these vehicles could previously fall freely to the closed position with no prior warning.

After powering the door open, the power liftgate motor automatically disengages. The upgraded software briefly monitors the position of the liftgate after the power liftgate motor disengages. If the system detects a rapid movement of the liftgate in the closing direction, the power liftgate enters a fail-safe mode in which the motor clutch will re-engage to brake the liftgate and prevent it from closing in an uncontrolled manner. Testing conducted to validate the repair indicated the liftgate may descend approximately four to five inches until the motor clutch fully re-engages. The system then continuously sounds a unique chime and the Power Liftgate motor performs a normal controlled power close. Should this condition occur, the power liftgate module will set an internal flag to indicate the fail-safe mode was activated. In the event that the fail-safe mode is activated on three consecutive openings, the Power Liftgate system will be deactivated and will set a Diagnostic Trouble Code. In the event the system is deactivated, the customer can still operate the liftgate manually.

Ford notes that many of the reports provided in this response relate to unexpected movement of the liftgate on vehicles that have already had the recall remedy performed. These reports likely relate to this programmed feature that will automatically sound a chime and conduct a normal controlled power close function should one of the liftgate struts malfunction and have inadequate strength to hold the liftgate open. There are no alleged injuries in vehicles that had the recall service performed or that are outside the recall population.