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February 9, 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: EA06-010:NVS-213swmc

The Ford Motor Company (Ford) response to the agency's December 12, 2006, letter requesting certain information concerning 2005-2006 model year Freestyle vehicles is attached. Ford understands that there is no alleged defect with respect to any of its vehicles and is providing this information as part of the agency's investigation of another manufacturer's vehicles.

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

Sincerely,

James P. Vondale

Attachment



FORD MOTOR COMPANY (FORD) RESPONSE TO EA06-010

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.

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 (VINs). 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).

In a December 18, 2006, telephone conversation, Jeffrey Quandt of the agency informed Ford personnel that the scope of the information request includes the 2005-2006 model year Ford Freestyle, and that a request for information on 2004-2006 model year Mazda RX-8 vehicles would be sent separately to Mazda Corporation.

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 12, 2006, the date of your inquiry. Ford has searched within the following offices for responsive documents: Environmental and Safety Engineering, Ford Customer Service Division, Global Core Engineering, Office of the General Counsel, and North American 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 peer vehicle manufactured to date by Ford, state the following:

- a. Vehicle identification number (VIN);
- b. Make,

- c. Model;
- d. Model Year;
- e. Date of manufacture;
- f. Date warranty coverage commenced;
- g. The State in the United States where the vehicle was originally sold or leased (or delivered for sale or lease)
- h. Whether there was any shielding used on the fuel tank assembly.

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

#### Answer

Ford records indicate that the approximate total number of subject peer vehicles sold in the United States (the 50 states and the District of Columbia) and its protectorates and territories (American Samoa, Guam, Northern Mariana Islands, Puerto Rico, and Virgin Islands) is 129,558.

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

Model	2005 MY	2006 MY
Ford Freestyle	75,566	53,992

The requested data for the subject peer vehicle is provided electronically in Appendix A (filename: 2007-02-09 Appendix A) on the enclosed CD.

The 2005-2006 model year Freestyle has a heat shield which covers the fuel tank assembly in the area of the exhaust.

#### Request 2

State the number of each of the following, received by Ford, or of which Ford is otherwise aware, which relate to, or may relate to, the alleged defect in the subject vehicles:

- a. Consumer complaints, including those from fleet operators;
- b. Field reports, including dealer field reports;
- c. Reports involving a crash, injury, or fatality, based on claims against the manufacturer involving a death or injury, notices received by the manufacturer alleging or proving that a death or injury was caused by a possible defect in a subject vehicle, property damage claims, consumer complaints, or field reports;
- d. Reports involving a fire, based on claims against the manufacturer involving 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;
- e. Property damage claims; and
- f. Third-party arbitration proceedings where Ford is or was a party to the arbitration; and
- g. 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 "g," 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 "f" and "g," 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 subject condition and any related documents, Ford has gathered "owner reports" and "field reports" maintained by Ford Customer Service Division (FCSD), fleet reports maintained in a Fleet Test Database, and claim and lawsuit information maintained by Ford's Office of the General Counsel (OGC).

Descriptions of the FCSD owner and field report systems and the Fleet Test Database systems and the criteria used to search each of these are provided electronically in Appendix B (filename: 2007-02-09 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	Alleged Fuel tank punctures from contact by road debris

We are not providing electronic copies of reports categorized "non-specific allegation" for your review because, based on our engineering judgment, the information in these reports is insufficient to support a determination that they pertain to the subject condition.

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 category described above. The number and copies of relevant reports identified in this search are provided in the MORS III portion of the electronic database contained in Appendix C (filename: 2007-02-09 Appendix C). The categorization of each report is identified in the "Category" field.

When we were able to identify that responsive duplicate owner reports for an alleged incident were received, each of these duplicate reports was marked accordingly, and the group counted as one report.

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 owner reports indicating that they are Legal Contacts were identified, and thus, no files have been gathered from the Litigation Prevention section.

Fleet Reports: Ford is providing in Appendix B a description of the Fleet Test Database. This database contains reports only for 2002 and prior model year vehicles. Because the subject

Fleet Reports: Ford is providing in Appendix B a description of the Fleet Test Database. This database contains reports only for 2002 and prior model year vehicles. Because the subject peer vehicles fall outside of this scope, the Fleet Test Database was not searched for relevant reports.

Field Reports: Records identified in a search of the Common Quality Indicator System (CQIS) database, as described in Appendix B, were reviewed for relevance and categorized in accordance with the category described above. No relevant field reports were identified in this search.

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 and copies of relevant reports identified in this review that may relate to the agency's investigation based on the verbatim comments is provided in Appendix C.

Crash/Injury Incident Claims: For purposes of identifying allegations of accidents or injuries that may have resulted from the subject condition, Ford has reviewed responsive owner reports. No relevant claims of crashes or injuries were identified in this search.

Claims, Lawsuits, and Arbitrations: For purposes of identifying incidents that may relate to the subject condition, Ford has gathered claim and lawsuit information maintained by Ford's OGC. Ford's OGC is responsible for handling product liability lawsuits, claims, and consumer breach of warranty lawsuits and arbitrations against the Company. Lawsuits and claims gathered in this manner were reviewed for relevance. No relevant lawsuits, claims or arbitrations were identified in this search.

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

Answer

Ford is providing 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 these reports, it is provided in the database. No relevant field reports, lawsuits or claims were identified in this search.

Request 4

Produce copies of all documents related to each item within the scope of Request Number Two. Organize the documents separately by category (i.e., crash/injury/fatality report property damage claims, etc.) and describe the method Ford used for organizing the documents.

Answer

No relevant reports containing allegations of crashes, injuries, fatalities, fire or property damage were identified. Therefore, there are no documents responsive to this request.

Request 5

State, by model and model year, a total count for all of the following categories of claims, collectively, that have been paid by Ford to date that relate to, or may relate to, the alleged defect in the subject vehicles: warranty claims; extended warranty claims; claims for good will services that were provided; field, zone, or similar adjustments and reimbursements; and warranty claims or repairs made in accordance with a procedure specified in a technical service bulletin or customer satisfaction campaign.

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

- a. Ford's claim number;
- b. Vehicle owner or fleet name (and fleet contact person) and telephone number;
- c. Vehicle owner or mailing address;
- d. Vehicle make;
- e. Vehicle Model;
- f. Vehicle Model Year;
- g. VIN;
- h. Repair date;
- i. Vehicle mileage at time of repair;
- j. Repairing dealer's or facility's name, telephone number, city and state or ZIP code;
- k. Labor operation number;
- l. Problem code;
- m. Replacement part number(s) and description(s);
- n. Concern stated by customer; and
- o. Complaint, cause, correction and comments, if any, by dealer/technician relating to claim and/or repair.

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

Answer

Records identified in a search of the AWS database, as described in Appendix B, were reviewed for relevance and categorized in accordance with the category described in the response to Request 2. There were no relevant warranty claims pertaining to the subject condition.

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

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. Provide a list of all labor operations, labor operation descriptions, problem codes, and problem code descriptions applicable to the subject condition in the subject peer 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 peer 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 2005 through 2006 model year Ford Freestyle 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. Ford notes that the subject condition is considered to be the result of a road hazard and is not covered under Ford's bumper-to-bumper warranty. Optional Extended Service Plans (ESPs) were available to cover various vehicle systems, time in service and mileage increments. The details of the various plans, as well as the number of vehicles participating in the plans is provided electronically in Appendix D (filename: 2007-02-09 Appendix D) on the enclosed CD.

Request 7

Provide the following information concerning the subject fuel tank assemblies (information previously supplied in response to PE05-050 need not be duplicated):

- a. Drawings showing the design ground clearance of the subject fuel tank assembly;
- b. Identify all subject vehicle components that have lower ground clearances than the subject peer fuel tanks and state the location and the ground clearance for each;

- c. Provide a bottom view drawing or picture showing the undercarriage of the vehicle in the fully built configuration with the fuel tank and the locations of all components identified in "8.b,"
- d. Copies of all engineering specifications relating to the packaging, shielding, ground clearance, and/or puncture resistance of the subject peer fuel tanks;
- e. Copies of all engineering standards, design guides, or similar documents that relate in any way to the packaging, shielding, ground clearance, and/or puncture resistance of fuel tanks in passenger cars or light trucks;
- f. State what material the subject peer fuel tank is composed of (e.g., HDPE plastic), and
- g. State the supplier and/or maker of the subject peer fuel tank assemblies.

#### Answer

Requests 7a, 7b, and 7c are addressed in the drawings provided electronically as Appendix E1 (filename: 2007-02-09 Appendix E1). These drawings are of a 2005 model year Freestyle; they are also representative of the 2006 model year Freestyle design. The ground clearances provided are based on the smallest wheel and tire combination and with the vehicle at design load (5 occupants weighing 150 pounds each and 150 pounds of cargo).

As requested in 7b and 7c, the components that have a lower ground clearance than the fuel tank and their locations are also identified in Appendix E1. These components include the stabilizer bar and portions of the exhaust pipe. In a December 20, 2006, telephone conversation, Stephen McHenry of the agency informed Ford personnel that item 7.c which references "8.b" should instead reference "7.b."

Documents relevant to Requests 7d and 7e will be submitted under separate cover with a request for confidentiality to the agency's Office of Chief Counsel. These documents pertain to the subject fuel tank's in-vehicle ground clearance requirements, as well as the test requirement pertaining to the tank's puncture resistance. These documents are referenced as Appendices E2, E3 and E4 (filenames: 2007-02-09 Appendix E2, 2007-02-09 Appendix E3, 2007-02-09 Appendix E4).

As requested in 7f and 7g the 2005-2006 model year Freestyle fuel tank is predominantly comprised of HDPE plastic and is manufactured by Visteon Corporation.

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