



U.S. Department
of Transportation
**National Highway
Traffic Safety
Administration**

NOV 26 2007

1200 New Jersey Avenue SE
Washington, DC 20590

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. James Vondale, Director
Automotive Safety Office, Environmental and Safety Compliance
Ford Motor Company
Fairlane Plaza South
330 Town Center Drive, Suite 400
Dearborn, MI 48126

NVS-214bby
PE07-057

Dear Mr. Vondale:

This letter is to inform you that the Office of Defects Investigation (ODI) of the National Highway Traffic Safety Administration (NHTSA) has opened a Preliminary Evaluation (PE07-057) to investigate severe oscillations occurring in the steering and suspension systems of 2005 thru 2007 Model Year (MY) Ford F-250 and F350 Super Duty 4x4 vehicles manufactured by Ford Motor Company, and to request information from Ford related to this issue.

This office has received 78 reports of steering or suspension system oscillations in 2005 thru 2007 Model Year (MY) Ford F-250 and F-350 Super Duty 4x4 and 4x2 vehicles after having traveled across rough or uneven road surfaces. One of these reports alleges that the driver lost control of the vehicle resulting in the vehicle leaving the road and running off into a wooded area after driving over a sewer grate.

In addition, ODI has received Early Warning aggregate data submitted to NHTSA by Ford that suggests that a steering (EWR code 01) and suspension (EWR code 02) problem exists for the 2005 thru 2007 F-250 and F-350 Super Duty 4x4 vehicles. Review of the EWR data found a number of field reports that described steering and suspension system oscillations.

Steering and suspension system oscillations like the ones described in the consumer and field reports submitted to NHTSA could lead to steering difficulties, unintended lane changes, loss of vehicle control or a crash resulting in injury or death. ODI considers steering difficulties and loss of vehicle control of a motor vehicle to be a safety related issue. A copy of each of the reports referenced above is enclosed for your information.

Unless otherwise stated in the text, the following definitions apply to these information requests:

- **Subject Vehicles:** All MY 2005 through 2007 F-250 and F350 Super Duty 4x4 model vehicles.



- **Peer Vehicles:** All MY 2005 through 2007 F-250 and F350 Super Duty 4x2 model vehicles.
- **Ford:** Ford, all of its past and present officers and employees, whether assigned to its principal offices or any of its field or other locations, including all of its divisions, subsidiaries (whether or not incorporated) and affiliated enterprises and all of their headquarters, regional, zone and other offices and their employees, and all agents, contractors, consultants, attorneys and law firms and other persons engaged directly or indirectly (e.g., employee of a consultant) by or under the control of Ford (including all business units and persons previously referred to), who are or, in or after 1996, were involved in any way with any of the following related to the alleged defect in the subject vehicles:
 - a. Design, engineering, analysis, modification or production (e.g. quality control) of subject and peer vehicles;
 - b. Testing, assessment or evaluation of subject and peer vehicles;
 - c. Consideration, or recognition of potential or actual defects, reporting, record-keeping and information management, (e.g., complaints, field reports, warranty information, part sales), analysis, claims, or lawsuits.
- **Alleged defect:** Oscillations occurring in the steering and suspension systems on a subject vehicle following front or rear wheel impacts in the road surface including but not limited to potholes, sewer tops, manhole covers, expansion joints “drop offs” and delamination areas.
- **Document:** “Document(s)” is used in the broadest sense of the word and shall mean all original written, printed, typed, recorded, or graphic matter whatsoever, however produced or reproduced, of every kind, nature, and description, and all non-identical copies of both sides thereof, including, but not limited to, papers, letters, memoranda, correspondence, communications, electronic mail (e-mail) messages (existing in hard copy and/or in electronic storage), faxes, mailgrams, telegrams, cables, telex messages, notes, annotations, working papers, drafts, minutes, records, audio and video recordings, data, databases, other information bases, summaries, charts, tables, graphics, other visual displays, photographs, statements, interviews, opinions, reports, newspaper articles, studies, analyses, evaluations, interpretations, contracts, agreements, jottings, agendas, bulletins, notices, announcements, instructions, blueprints, drawings, as-builts, changes, manuals, publications, work schedules, journals, statistical data, desk, portable and computer calendars, appointment books, diaries, travel reports, lists, tabulations, computer printouts, data processing program libraries, data processing inputs and outputs, microfilms, microfiches, statements for services, resolutions, financial statements, governmental records, business records, personnel records, work orders, pleadings, discovery in any form, affidavits, motions, responses to discovery, all transcripts, administrative filings and all mechanical, magnetic, photographic and electronic records or recordings of any kind, including any storage media associated with computers, including, but not limited to, information on hard drives, floppy disks, backup tapes, and zip drives, electronic communications, including but not limited to, the Internet and shall

include any drafts or revisions pertaining to any of the foregoing, all other things similar to any of the foregoing, however denominated by Ford, any other data compilations from which information can be obtained, translated if necessary, into a usable form and any other documents. For purposes of this request, any document, which contains any note, comment, addition, deletion, insertion, annotation, or otherwise comprises a non-identical copy of another document shall be treated as a separate document subject to production. In all cases where original and any non-identical copies are not available, "document(s)" also means any identical copies of the original and all non-identical copies thereof. Any document, record, graph, chart, film or photograph originally produced in color must be provided in color. Furnish all documents whether verified by the manufacturer or not. If a document is not in the English language, provide both the original document and an English translation of the document.

- **Other terms:** To the extent that they are used in these information requests, the terms "claim," "consumer complaint," "dealer field report," "field report," "fire," "fleet," "good will," "make," "model," "model year," "notice," "property damage," "property damage claim," "rollover," "type," "warranty," "warranty adjustment," and "warranty claim," whether used in singular or in plural form, have the same meaning as found in 49 CFR 579.4.

In order for my staff to evaluate the alleged defect, certain information is required. Please provide numbered responses to the following information requests. When documents are produced, the documents shall be produced in an identified, organized manner that corresponds with the organization of this information request letter (including all individual requests and subparts). When documents are produced and the documents would not, standing alone, be self-explanatory, the production of documents shall be supplemented and accompanied by explanation.

Please repeat the applicable request verbatim above each response. After Ford's response to each request, identify the source of the information and indicate the last date the information was gathered. If requested information is unavailable, so state and provide a brief explanation. Along with your written response, please provide this information in Microsoft Word 2000, or a compatible format, entitled "IR Response."

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 subject vehicle manufactured to date state the following:
 - a. Vehicle Identification Number;
 - b. Model;
 - c. Model Year;
 - d. Date of manufacture;
 - e. Date warranty coverage commenced;
 - f. The State in the United States where the vehicle was originally sold or leased (or delivered for sale or lease).

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

2. State the number of each of the following, received by Ford, or of which Ford is otherwise aware, which 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. Third-party arbitration proceedings where Ford is or was a party to the arbitration; and,
 - e. Lawsuits, both pending and closed, in which Ford is or was a defendant or codefendant.

For subparts "a" through "e," state the total number of each item (e.g., consumer complaints, field reports, etc.) separately for each model and model year. 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 "e," provide a summary description of the alleged problem and causal and contributing factors and Fords assessment of the problem, with a summary of the significant underlying facts and evidence. For items "d" and "e", 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.

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. Fords 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. Incident state;
 - i. Report or claim date;
 - j. Whether a crash is alleged;
 - k. Whether property damage is alleged;
 - l. Number of alleged injuries, if any;
 - m. Number of alleged fatalities, if any;

- n. Alleged cause of the failure;
- o. Complaint summary;
- p. Consumer comments; and,
- q. Fords assessment of the allegation;

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 designed for this submission.

- 4. Produce electronic 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.
- 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, which relate to the alleged defect, 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. Separately, for each such claim, state the following information:
 - a. Fords claim number;
 - b. Vehicle owner or fleet name (and fleet contact person) and telephone number;
 - c. VIN;
 - d. Vehicle's make, model, and model year;
 - e. Repair date;
 - f. Vehicle mileage at time of repair;
 - g. Repairing dealer's or facility's name, telephone number, city and state or ZIP code;
 - h. Labor operation number;
 - i. Problem code;
 - j. Causal part (if identified);
 - k. Replacement part number(s) and description(s);
 - l. Repair procedure performed;
 - m. Technical Service Bulletin performed;
 - n. Concern stated by customer; and
 - o. Comments, 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 designed for this submission.

- 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 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) related to the alleged defect 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.

7. Produce electronic copies of all service, warranty, and other documents that relate to, or may relate to, the alleged defect in the subject vehicles, that Ford has issued to any dealers, regional or zone offices, field offices, fleet purchasers, or other entities. This includes, but is not limited to, bulletins, advisories, informational documents, training documents, or other documents or communications, with the exception of standard shop manuals. Also include the latest draft copy of any communication that Ford is planning to issue within the next 120 days.
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 or any of 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 electronic 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.

9. State whether Ford has ever conducted, or is aware of, any returned part analyses in subject vehicles related to the alleged defect. If so, describe, and provide electronic copies of all documents and photographs relating to, any and all returned part analyses of subject components. Include in your description the total number of such parts returned, the number analyzed, a description of how they were analyzed, a listing of all such components that were inspected, tested, evaluated, or assessed by stating the vehicle's VIN, recall repair date, mileage at the recall repair date, date of build, anomalies detected, and reason for specific component analysis. Include any and all material showing the frequencies of failed components as a function of service life or mileage.
10. Provide copies of all documents transmitted internally within Ford that relate to the alleged defect in the subject vehicles. Organize the document copies in chronological order.
11. Provide copies of all failure mode and effects analyses related to the alleged defect in the subject vehicles.

12. Furnish Fords assessment of the alleged defect in the subject vehicles, including:

- a. An assessment of the failure mechanism including all causal or contributory factors;
- b. An assessment of the design factors of the subject vehicles that may contribute to or influence the existence of the alleged defect;
- c. An assessment of the manufacturing factors that may contribute to or influence the existence of the alleged defect;
- d. An assessment of the vehicle assembly factors that may contribute to or influence the existence of the alleged defect;
- e. An assessment of the vehicle use factors of the subject component that may contribute to or influence the existence of the alleged defect;
- f. Being as specific as possible in your answers, please provide engineering explanations for how various factors affect the suspension and steering systems resulting in the alleged defect;
- g. Any warning symptoms;
- h. The root cause of the failures;
- i. Its potential effect on occupant safety; and
- j. The potential for future occurrences of the alleged defect in the subject vehicles;

If Ford cannot respond to any specific request or subpart(s) thereof, please state the reason why it is unable to do so. If on the basis of attorney-client, attorney work product, or other privilege, Ford does not submit one or more requested documents or items of information in response to this information request, Ford must provide a privilege log identifying each document or item withheld, and stating the date, subject or title, the name and position of the person(s) from, and the person(s) to whom it was sent, and the name and position of any other recipient (to include all carbon copies or blind carbon copies), the nature of that information or material, and the basis for the claim of privilege and why that privilege applies.

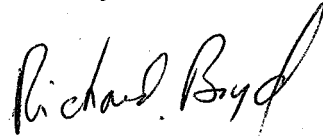
Fords response to this letter, in duplicate, together with a copy of any confidentiality request, must be submitted to this office by **February 4, 2008**. Please refer to **PE07-057** in Fords response to this letter. If Fords finds that it is unable to provide all of the information requested within the time allotted, Fords must request an extension from Mr. Richard Boyd at (202) 366-4933 no later than five business days before the response due date. If Ford is unable to provide all of the information requested by the original deadline, it must submit a partial response by the original deadline with whatever information Ford then has available, even if an extension has been granted.

If Ford claims that any of the information or documents provided in response to this information request constitute confidential commercial material within the meaning of 5 U.S.C. § 552(b)(4), or are protected from disclosure pursuant to 18 U.S.C. § 1905, Ford must submit supporting information together with the materials that are the subject of the confidentiality request, in accordance with 49 CFR Part 512, as amended (69 Fed. Reg. 21409 et seq; April 21, 2004), to the Office of Chief Counsel (NCC-110), National Highway Traffic Safety Administration, Room W41-227, 1200 New Jersey Avenue, S.E., Washington, D.C. 20590. Ford is required to submit two copies of the documents containing allegedly confidential information (except only one copy

of blueprints) and one copy of the documents from which information claimed to be confidential has been deleted.

If you have any technical questions concerning this matter, please call Bruce York of my staff at (202) 366-6938.

Sincerely,

A handwritten signature in cursive script that reads "Richard P. Boyd". The signature is written in black ink and is positioned above the typed name.

Richard P. Boyd, Chief
Medium and Heavy Duty Vehicle Division
Office of Defects Investigation

Attachment 1, List of 78 consumer complaints received by ODI related to the subject investigation PE07-057.

Attachment 1

(List of consumer complaints received by ODI related to the subject investigation PE07-057)

ODI_ID

10204604	10193596
10206135	10192463
10205071	10194071
10204597	10191566
10205394	10192183
10205448	10189494
10206556	10190731
10205044	10186834
10206998	10188890
10202327	10187238
10203175	10185954
10204193	10184079
10204049	10183420
10204337	10183574
10204198	10183787
10203396	10183429
10198445	10177882
10198529	10181271
10200428	10179080
10198736	10177891
10198252	10176370
10200557	10176685
10198977	10173548
10200771	10174494
10198762	10174591
10199973	10169666
10198430	10170444
10196039	10164642
10195484	10166185
10197626	10162191
10197717	10161126
10196519	10155324
10196232	10154404
10195622	10145578
10197931	10145946
10196082	10144546
10197301	10142088
10197033	10134178
10192570	10114952