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7/5/07

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June 27, 2007

7/5/07

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

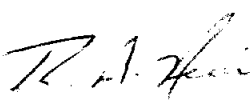
Dear Ms. DeMeter:

Subject: PE07-025PIR:NVS-212pco

The Ford Motor Company (Ford) response to the agency's May 18, 2007, peer vehicle information request concerning allegations of failure, tearing, bending or loosening of the trailer hitch receiver on 2002 through 2003 F150/250 and Navigator/Expedition/Excursion vehicles is attached. We understand these vehicles are being used as a peer comparator in the agency's investigation PE07-025.

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 PE07-025

Ford's response to this Preliminary Evaluation 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.

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 18, 2007, the date of your inquiry. Ford has searched within the following offices for responsive documents: Environmental and Safety Engineering, Ford Customer Service Division, Quality, Office of the General Counsel, North American Truck Product Development, and Lincoln Mercury Product Development.

Request 1

State within the body of the response letter and in an electronic spreadsheet format, by model, model year, the total number of subject 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. Make;
- b. Model;
- c. Model Year;
- d. Vehicle identification number (VIN);
- e. Date of manufacture (in :yyyy/mm/dd" date format);
- f. Date warranty coverage commenced (in yyyy/mm/dd" format) or "Unsold" if not sold; and;
- g. The State in the United States where the vehicle was originally sold or leased (or delivered for sale or lease).

In addition, provide within the body of the response letter, a table containing the subject peer vehicles by model, model year, GVWR, GCWR, and the corresponding hitch rating(s) including the trailer towing capacity and tongue weight (with and without the

weight distribution hitch). Describe which of these vehicle towing attributes can be deciphered from within the vehicle's VIN code. Provide this spreadsheet table also in a file in Microsoft Excel, or a compatible format, entitled "VEHICLE TOW RATINGS."

Provide a separate population file for each MY of the peer vehicle and within each MY file, a separate population table for each GVWR group in Microsoft Access 2000, or a compatible format, entitled "MY XX PEER VEHICLE PRODUCTION DATA." If there are multiple tow ratings for the same model year/GVWR vehicle, denote them.

Answer

Ford records indicate that the approximate total number of subject peer vehicles equipped with trailer hitch receivers and 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 1,188,203.

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

Model	2002 MY	2003 MY
F150	237,718	238,429
Expedition	41,795	244,517
Navigator	17,869	47,097
F250	143,935	163,385
Excursion	26,895	26,563

In order to determine gross combination weight rating (GCWR) and the corresponding vehicle trailer tow rating, the gross vehicle weight rating (GVWR), engine, transmission, body style, and rear axle ratio of the vehicle must be known. Due to the large number of engine, transmission, body style and rear axle ratio combinations in the subject peer vehicle population, a summary table, in this response letter, would be impractical.

In a June 13, 2007, telephone conversation with Mr. Peter Ong of the agency, it was agreed that specific vehicle information necessary to determine GCWR and trailer tow ratings would be provided electronically (Appendix A, filename: 2007-06-27 Appendix A.zip) on the enclosed CD.

Request 2

State, within the body of the response letter and in an electronic spreadsheet format, a table each showing 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 MY and GVWR group:

- 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 (including own vehicle); 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). Identify reports that are duplicates of other mfg reports/claims.

Provide the table in Microsoft Excel 2000, or a compatible format, entitled "MANUFACTURER REPORT COUNT."

Answer

For purposes of identifying reports of incidents that may be related to failure, tearing, bending or loosening of the hitch receiver, 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: 2007-06-27 Appendix B.pdf) on the enclosed CD.

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

Category	Allegation
A	Breaking, tearing, bending of, or weld integrity concerns with, the hitch receiver, or loosening, stripping, or breaking of the hitch receiver attachment bolts

Owner Reports: Records identified in a search of the Master Owner Relations Systems (MORS) database, as described in Appendix B, were reviewed for relevance in accordance with the category described above. No such records were found.

Legal Contacts: Ford is providing in Appendix B a description of Legal Contacts and the activity that is responsible for this information, Litigation Prevention. Because there are no responsive owner reports, there are no related 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 category described above. Ford identified two non-duplicative reports. A summary by model year, model, and GVWR class is as follows:

Model Year	Model	GVWR Class	Count
2002	Excursion	9,001-10,000	1
2002	F150	6,001-7000	1

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 (filename: 2007-06-27 Appendix C.mdb) on the enclosed CD. The categorization of each report is identified in the "Category" field.

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 and field reports, and lawsuits and claims. No field reports with related allegations were found.

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 and categorized in accordance with the category described above. No lawsuits or claims with related allegations were found.

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 for the subject peer vehicle and each MY by GVWR groups:

- 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 (in "yyyy/mm/dd" date format);
- h. Report or claim date (in "yyyy/mm/dd" date format);
- 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.

Provide a separate complaint table for each model and for each MY of the subject peer vehicle. Provide this information in Microsoft Access 2000, or a compatible format, entitled "REQUEST NUMBER TWO DATA,"

Answer

Ford is providing 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 field reports, it is provided in the database.

Request 4

State within the body of the response letter and in an electronic spreadsheet format, by model, model year and GVWR groups, 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 a separate warranty data table for the subject peer vehicles for each MY. Provide this information in Microsoft Access 2000, or a compatible format, entitled "WARRANTY DATA."

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. Ford identified 16 non-duplicative reports. A summary by model year, model, and GVWR class is as follows:

Model Year	Model	GVWR Class	Count
2002	F150	5,001-6,000	1
2002	F150	6,001-7,000	6
2002	Navigator	7,001-8,000	1
2002	F250	8,501-9,000	3
2002	Excursion	9,000-10,000	1
2003	Expedition	6,001-7,000	1
2003	Expedition	7,001-8,000	1
2003	Navigator	7,001-8,000	2

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 on the enclosed CD. The categorization of each report is identified in the "Category" field.

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 this subject 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 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 peer vehicles. State, by make and model year, the terms of the new vehicle warranty coverage (including the OEM hitch receiver) offered by Ford on the subject peer 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 4 are described in Appendix B.

For 2002-2003 model year F150, Expedition, Navigator, F250, and Excursion 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 D (filename: 2007-06-27 Appendix D.pdf) on the enclosed CD.

Request 6

Describe the towing option(s) that are available to the owners for which the hitch receiver is installed as original equipment (OEM) on the vehicle including a description of other towing related accessories included in the package. Provide a copy of the owner manual towing section(s) and other available towing literatures that is provided to an owner of an OEM hitch receiver equipped vehicle and any other material that is available to the owner (on request or purchase) concerning towing limits and guides. If the material differs for GVWR groupings please specify.

Answer

Ford offered trailer tow features in a variety of combinations for the subject peer vehicles during the subject model years. A trailer tow option package was offered for 2002 and 2003 model year F150 and 2002 model year Expedition vehicles. The package included a class III receiver (capable of towing in excess of 5,000 lbs. with the addition of a weight distributing hitch), 7-pin trailer wiring harness and connector, auxiliary engine and/or transmission oil cooling, and other

features as appropriate for the specific model (e.g. heavy duty battery, heavy duty shock absorbers, load leveling rear suspension). The 2002 and 2003 model F250 included the trailer tow package (less the trailer hitch receiver) as standard equipment and offered the receiver as a stand alone option. For all Navigators, Excursions, and the 2003 model year Expedition, a complete trailer tow package (including the frame mounted class III/IV trailer hitch receiver) was included as standard equipment.

Annually, Ford publishes the "RV and Trailer Towing Guide." Provided within the guide is a list of the hardware contents of various trailer tow packages, by model. A copy of both the 2002 and 2003 guides is provided electronically in Appendix E (filenames: 2007-06-27 Appendix E 2002.pdf and 2007-06-27 Appendix E 2003.pdf) on the enclosed CD.

In addition to hardware, the "RV and Trailer Towing Guide" provides information on safe towing techniques as well as maximum loaded trailer weights based on vehicle model and powertrain and driveline configurations. It also identifies recommended and required equipment to safely tow up to the maximum capability of the vehicle.

Towing information for the specific model is also provided in the vehicle owner's manual. In addition to educational and safe towing information, the owner's manual also lists the maximum loaded trailer weights for the various configurations of the vehicle model. A copy of each of the towing sections from the owner's manuals of the subject vehicles and model years is provided electronically in Appendix F (various filenames) on the enclosed CD.