

**2007 Model Year Vehicles Using TR413 or TR414 Tire Valves
Inadequate Ozone Protection**

OWNER REPORTS

As the agency is aware, within FCSD's North American Customer Service Operations, there is a Customer Relationship Center (CRC) that is responsible for facilitating communication between customers, dealerships and Ford Motor Company. Among other things, the CRC handles telephonic, electronic, and written inquiries, suggestions, informational requests, and concerns ("contacts") from Ford and Lincoln-Mercury vehicle owners about their vehicles or sales and service experience. The contacts are handled by CRC customer service representatives who enter a summary of the customer contact into a database known as CuDL (Customer Data Link). Certain contacts, such as letters from customers, are entered into the CuDL database. Those that were entered into the earlier MORS II system were also microfilmed. More recently, the records in MORS III/CuDL are imaged and stored electronically.

The CRC assigns to each vehicle-related contact report a "symptom code" or category that generally reflects the nature of the customer contact or vehicle concern, as described by the owner. The CRC does not undertake to confirm the accuracy of the description provided by the owner; they simply record what is reported. Therefore, given the complexity of the modern motor vehicle, it is Ford's experience that a significant percentage of owner contacts do not contain sufficient information to make a technical assessment of the condition of the vehicle or the cause of the event reported. Accordingly, although MORS contact reports may be useful in identifying potential problems and trends, the records are not the empirical equivalent of confirmed incidents and/or dealership's diagnosis. In the interest of responding promptly to this inquiry, Ford has not undertaken to gather the electronic images related to these contacts because of the largely duplicative nature of the information contained in the images, as well as the time and the burden associated with locating and producing those documents. The pertinent information related to those contacts generally would be included in the contact reports obtained from the CuDL system. To the extent that those documents exist, they are reflected in the comments of MORS III contact reports. Upon request, Ford will attempt to locate any specific items that are of interest to the agency.

In responding to this information request, Ford electronically searched CuDL using the following criteria:

<u>Model Year:</u>	2006 through 2008
<u>Subject Vehicle:</u>	Vehicles manufactured for sale or lease in the United States, District of Columbia, Puerto Rico, Northern Mariana Islands, Guam, American Samoa and the Virgin Islands equipped with TR413, TR414 or TR418 snap-in tire valves.
<u>Date Parameters:</u>	January 1, 2005 through October 16, 2008 (the date of this inquiry)
<u>Types of Contacts:</u>	All, including suspended data, canceled contacts and inquiries

MORS III Symptom Code(s):

Symptom Category	Symptom Code	Symptom Description
Tires wheels	306000	Any contact related to tires or wheels
Tires wheels	306200	Air loss
Tires wheels	306201	Air loss/slow leak
Tires wheels	306202	Air loss/puncture
Tires wheels	306600	Tire failure
Tires wheels	306602	Tire failure/blown tire
Tires wheels	306609	Tire failure/valve stem concerns
Tires wheels	306A14	Indicator low pressure

MORS III Reason Code(s):

Reason Code	Description
07	Legal contacts

The reports located using the search criteria described above were then searched using the Electronic Data Download System.

LEGAL CONTACTS

Since early 2008, most consumer complaints and all legal claim processing has been centralized in OGC within the Consumer Litigation team. Since that time a transition has occurred such that all legal contacts (including those formerly handled by "Litigation Prevention") are coordinated through this team.

Prior to the transition, there was a Consumer Affairs Department within FCSD that managed customer concerns, which could not be resolved by the Customer Relationship Center (CRC). Among other things, the Consumer Affairs Department had a section, known as "Litigation Prevention," that handled a variety of informal (i.e., non-litigation) claims, such as property damage claims or attorney demand claims.

The Litigation Prevention section had been centralized in the Consumer Affairs Department since 1995, in Dearborn, Michigan. Prior to that time, Litigation Prevention personnel operated on a regional basis. For matters that the Litigation Prevention section handled, there were typically paper files that reflected the handling, investigation and resolution of property damage claims.

The claims, known as "Legal Contacts" are entered into the CuDL database that the CRC uses to enter other customer communications. When a customer contact is designated as a Legal Contact, it is so indicated near the top of the contact report.

FIELD REPORTS

Within FCSD, there is a Vehicle Service & Programs Office that has overall responsibility for vehicle service and technical support activities, including the administration of field actions. That Office is the primary source within Ford of vehicle concern information originating from Ford and Lincoln-Mercury dealerships, field personnel, and other sources. The information is maintained in a database known as the Common Quality Indicator System (CQIS). The CQIS

database includes reports compiled from more than 40 Company sources (e.g., Company-owned vehicle surveys, service technicians, field service and quality engineers, and technical hot line reports, etc.) providing what is intended to be a comprehensive concern identification resource. As with MORS contact reports, CQIS reports are assigned a "symptom code" or category that generally reflects the nature of the concern.

In responding to this information request, Ford electronically searched CQIS using the following criteria:

Model Year: 2006 through 2008

Subject Vehicle: Vehicles manufactured for sale or lease in the United States, District of Columbia, Puerto Rico, Northern Mariana Islands, Guam, American Samoa and the Virgin Islands equipped with TR413, TR414 or TR418 snap-in tire valves.

Date Parameters: January 1, 2005 through October 16, 2008 (the date of this inquiry)

Symptom Code(s): .

Symptom Category	Symptom Code	Symptom Description
Chassis/Tires wheels	306200	Air loss/unknown
Chassis/Tires wheels	306201	Air loss/slow leak
Chassis/Tires wheels	306299	Air loss/not listed
Chassis/Tires wheels	306600	Tire failure/unknown
Chassis/Tires wheels	306609	Tire failure/valve stem
Chassis/Tires wheels	306699	Tire failure/not listed

The reports located using the search criteria described above were then searched using the Electronic Data Download System.

OASIS MESSAGES

FCSD is responsible for communicating a variety of vehicle and service information, such as warranty information for up to the past 360 days, Extended Service Plan part coverage information, and technical repair information, to North American Ford and Lincoln Mercury dealers. This information is communicated primarily through OASIS, which serves as an electronic link between Ford Motor Company and the dealers. OASIS covers all North American Ford and Lincoln Mercury cars and light trucks, and medium and heavy-duty Ford trucks, for the ten most current model years. Technical diagnostic and repair information on OASIS is contained in Special Service Messages (SSMs) and Technical Service Bulletin (TSBs) titles and brief summaries. It should be noted that dealers cannot access brief summaries.

SSMs and TSB titles are coded in OASIS by model year and vehicle line, and may be coded to other specific vehicle attributes (body style, engine code, or vehicle identification number) and one or more OASIS Service Code(s). The dealers with access to OASIS usually search for information on the database by entering a VIN and the applicable Service Codes. SSMs and TSB titles that become inactive or superseded continue to be accessible by Ford employees, but no longer are accessible by the dealers. Dealers also are able to determine the recalls

applicable to a particular vehicle by searching a particular VIN in OASIS. Recall information available on OASIS cannot be searched by Service Codes.

In 1998, the OASIS system was upgraded from the "OASIS 2" system to the new "Global OASIS." At that time, OASIS 2 was removed from service and is no longer used to communicate with dealers. During the upgrade, inactive information (such as inactive SSMs or superseded TSB titles) was not transferred to Global OASIS.

In responding to this information request, Ford searched Global OASIS for active, inactive, and superseded TSB titles and SSMs using the following search criteria:

Model Year: 2006 through 2008

Subject Vehicle: Vehicles manufactured for sale or lease in the United States, District of Columbia, Puerto Rico, Northern Mariana Islands, Guam, American Samoa and the Virgin Islands equipped with TR413, TR414 or TR418 snap-in tire valves.

Date Parameters: January 1, 2005 through October 16, 2008 (the date of this inquiry).

OASIS Service Code(s):

Code	Description
306XXX	Chassis/Tires Wheel

OASIS 2 and Global OASIS are not capable of performing electronic word searches, so the search results are reviewed manually to determine their applicability to the alleged defect in the subject vehicles.

The OASIS database also contains Broadcast Messages. Typically, these messages are directed to all dealerships and either are notifications of new SSMs/TSBs, or announcements with non-technical information (for example, "the Dealer Hotline will be closed today"). Broadcast Messages cannot be searched by OASIS service codes, and can be retrieved only while active (approximately 2 to 4 days). Ford has not undertaken to search for Broadcast Messages because Ford expects that any responsive information obtained with such a search generally would be non-substantive in nature or duplicative of the information obtained with the TSB title and SSM search described above.

INTERNAL SERVICE MESSAGES

FCSD, as part of its technical support activities, maintains fleet and technical telephone "hotlines." During the early stages of Ford's efforts to identify and resolve potential vehicle concerns, hotline personnel may draft Internal Service Messages (ISMs) on CQIS for their internal use. The ISMs are assigned a CQIS "symptom code" or category that generally reflects the nature of the concern. An ISM can form the basis for an oral response over the technical hotline to an inquiry from an individual dealer or fleet technician. The ISMs, however, are not made available electronically to fleets and dealers. Therefore, although ISMs are not "issued" to dealers like OASIS messages, Ford is construing this request broadly to include ISMs that may be related to the alleged defect in the subject vehicles.

In responding to this information request, Ford searched CQIS for active ISMs using the following search criteria:

Model Year: 2006 through 2008

Subject Vehicle: Vehicles manufactured for sale or lease in the United States, District of Columbia, Puerto Rico, Northern Mariana Islands, Guam, American Samoa and the Virgin Islands equipped with TR413, TR414 or TR418 snap-in tire valves.

Date Parameters: January 1, 2005 through October 16, 2008 (the date of this inquiry).

CQIS Symptom Code(s):

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Chassis/Tires wheels	306200	Air loss/unknown
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Chassis/Tires wheels	306299	Air loss/not listed
Chassis/Tires wheels	306600	Tire failure/unknown
Chassis/Tires wheels	306609	Tire failure/valve stem
Chassis/Tires wheels	306699	Tire failure/not listed

The CQIS database in which the ISMs reside is not capable of performing word searches, so the search results were reviewed manually to determine their applicability to the alleged defect in the subject vehicles.

FIELD REVIEW COMMITTEE

Ford's Field Review Committee reviews all potential field service actions, including safety recalls and customer satisfaction programs, and recommends appropriate actions to corporate management. A Vehicle Service & Programs representative serves as Secretary to the Field Review Committee. Following approval of a field service action, the Vehicle Service & Programs Office prepares and launches the action. A representative copy of the communication to Ford's dealers, fleets, and Regional offices announcing the field service action is maintained in the Field Review Committee files.

WARRANTY

Ford's Analytical Warranty System (AWS) contains warranty claims and vehicle information for model years 1991 and forward for North America, and model years 1992 and forward for Europe and Jaguar.

Ford performed a search of AWS for potentially responsive reports using the following search criteria:

Model Year: 2006 through 2008

Subject Vehicle: Vehicles manufactured for sale or lease in the United States, District of Columbia, Puerto Rico, Northern Mariana Islands, Guam, American Samoa and the Virgin Islands equipped with TR413, TR414 or TR418 snap-in tire valves.

Base Part Number(s):

Reported base part number of -1700-

Customer Concern Code(s):

CCC	Description
TB6	Slow leaks/valve stem troubles
A40	Tire pressure monitoring trouble

The reports located using the search criteria described above were then searched using the Electronic Data Download System.