



Automotive Safety Office
Environmental and Safety Engineering

Fairlane Plaza South
330 Town Center Drive
Dearborn, MI 48126-2738 USA

July 24, 2009

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

Dear Ms. DeMeter:

Subject: EA08-018:NVS-213kmb

The Ford Motor Company (Ford) response to the agency's June 30, 2009, letter concerning reports of alleged front coil spring fractures in 2002 and 2003 model year Taurus and Sable vehicles is attached.

Ford believes that the fracture of a front coil spring (even with a tire puncture and rapid air loss) does not represent an unreasonable risk to motor vehicle safety. If a coil spring fractures without puncturing a tire, as it does in many cases, it will not impede vehicle performance and may not even be detected by the vehicle operator. If tire contact with air loss does occur, both Ford and NHTSA FMVSS testing has consistently shown that, even if air loss is rapid, passenger cars like the Taurus and Sable, with their lower centers of gravity, remain controllable.

In July, 2004, Ford announced programs 04M04 and 04S17 in response to a known condition of corrosion pitting in front coil springs. These actions extended the warranty on front coil springs for the 1999 through 2001 model year Taurus and Sable vehicles (04M04) and provided spring catchers for vehicles in the 21 corrosion states plus Kentucky (04S17). Ford agreed to conduct the action as a safety recall to avoid a protracted dispute with the agency despite the benign consequence of this condition to vehicle control, supported by a complete absence of allegations of accidents or injuries attributed to the condition (despite a significant vehicle population and number of associated reports of spring fracture). At the time of those campaigns, and as verified in Ford's response to the agency's inquiry PE04-044, field data repeatedly supported the conclusion that a front spring fracture in these vehicles does not pose an unreasonable risk to motor vehicle safety. Ford's position remains unchanged after review of the reports gathered in the preparation of this response and the vehicle evaluations we have conducted to date.

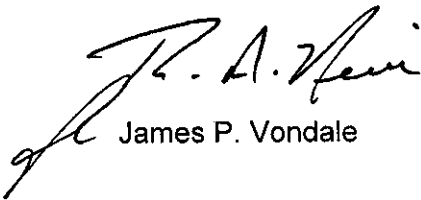
Ford recognizes that front coil spring fracture in 2002 and 2003 model year Taurus and Sable vehicles has resulted in significant customer dissatisfaction, particularly in light of Ford's previous action providing coverage for fractured front coil springs on 1999 through 2001 model



year Taurus and Sable vehicles. Even if spring fracture does not damage a tire, the cost of repair can be high. Ford is deeply committed to the satisfaction of all Ford customers and regrets any inconvenience this condition may cause. However, years of real world data clearly supports a conclusion that fracture of a front coil spring in the subject vehicles, even in the unlikely event that it may puncture a tire at higher speeds, should not result in any loss of vehicle control. The likelihood of a related accident or injury is extremely low. Despite the fact that front coil spring fractures have been addressed via safety recalls by Ford and other manufacturers in the past, there is no evidence to establish or support that this condition presents any unreasonable risk to motor vehicle safety in these vehicles.

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

Sincerely,

A handwritten signature in black ink, appearing to read "J. P. Vondale", written in a cursive style.

James P. Vondale

Attachment

FORD MOTOR COMPANY (FORD) RESPONSE TO EA08-018

Ford's response to this Engineering Analysis information request was prepared pursuant to a diligent search for the information requested. While we have employed our best efforts to provide responsive information, the breadth of the agency's request and the requirement that information be provided on an expedited basis make this a difficult task. We nevertheless have made substantial effort to provide thorough and accurate information, and we would be pleased to meet with agency personnel to discuss any aspect of this Engineering Analysis.

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. 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 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).

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 received between September 29, 2008 (the date of the agency's original EA08-018 information request) and June 30, 2009, the date of this information request. Ford has searched within the following offices for responsive documents: Environmental and Safety Engineering, Ford Customer Service Division, Office of the General Counsel, and North American Car Product Development.

Request 1

State the number of each of the following, received by Ford, or of which Ford are 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. Property damage claims;
 - 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).

In addition, for items "c" through "f," 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 "e" and "f," 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 alleged defect 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: 2009-07-23 Appendix B.pdf).

The following categorizations were used in the review of reports located in each of these searches:

Category	Allegation
A1	Allegation of front coil spring fracture with loss of air in tire
A2	Allegation of front coil spring fracture with no loss of air in tire
B	Allegation that is ambiguous whether related to front coil spring fracture

We are providing electronic copies of reports categorized as "B" as "non-specific allegations" for your review because of the broad scope of the request. Based on our engineering judgment, the information in these reports is insufficient to support a determination that they pertain to the alleged defect.

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 categories described above. The number and copies of relevant owner reports identified in this search that may relate to the agency's investigation are provided in the MORS III portion of the electronic database contained in Appendix C (filename: 2009-07-23 Appendix C.mdb). The categorization of each report is identified in the "Category" field.

When we were able to identify that responsive (i.e., not ambiguous) duplicate owner 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.

Legal Contacts: No new responsive Legal Contacts that relate to this request were identified.

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 investigation are provided in the CQIS portion of the electronic database contained in Appendix C. The categorization of each report is identified in the "Category" field.

VOQ Data: This information request had an attachment that included approximately 226 VOQs. Ford notes that a small number of these complaints are associated with allegations of rear coil spring fracture, which is not the subject of this investigation.

Ford made inquiries of its MORS database for customer contacts, and its CQIS database for field reports regarding the vehicles identified on the VOQs. Ford notes that in some instances where the VOQ does not contain the VIN or the owner's last name and zip code, it is not possible to query the databases for owner and field reports specifically corresponding to the VOQs. Any reports located on a vehicle identified in the VOQs related to the alleged defect are included in the MORS and CQIS portions of the electronic database provided in Appendix C and have been identified by a "Y" in the "VOQ Dup" field.

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, VOQs, and lawsuits and claims. Ford received one allegation that a vehicle went into a ditch following a front coil spring fracture, but there was no reported vehicle or property damage. In fact, an earlier communication by this customer regarding the incident made no reference to the vehicle leaving the roadway. Information regarding this allegation is being provided electronically as Appendix G (filename: 2009-07-23 Appendix G.pdf). Copies of any available reports related to this allegation is provided in the MORS, CQIS, and Analytical Warranty System (AWS) portions of the electronic database provided in Appendix C.

In addition, one VOQ complainant (ODI# 10250709) alleged that their vehicle went into a ditch following a front coil spring fracture. However, no contact with Ford was initiated by this complainant with respect to the allegation.

Claims, Lawsuits, and Arbitrations: For purposes of identifying incidents that may relate to the alleged defect, Ford 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 sorted by the categories described above.

We are providing the requested detailed information, where available, on the responsive claims in our Log of Lawsuits and Claims in Appendix C, in the Legal Claim/Lawsuits tab. The number of relevant claims identified (two) is also provided in this log. To the extent available, electronic

copies of complaints, first notices, or MORS reports relating to the matter shown on the log is provided electronically as Appendix E (filename: 2009-07-23 Appendix E.pdf). Ford has not undertaken to contact outside law firms to obtain additional documentation related to these claims.

Request 2

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 coil spring/ tire contact is alleged;
- j. Whether a tire puncture is alleged;
- k. Whether a crash is alleged;
- l. Whether property damage is alleged;
- m. Number of alleged injuries, if any; and
- n. 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 this submission.

Answer

Ford is providing owner and field reports in the electronic database contained in Appendix C in response to Request 1. To the extent information sought in Request 2 is available for owner and field reports, it is provided in the database. To the extent information sought in Request 2 is available, it is provided in the Legal Claims/Lawsuits tab in Appendix C.

Request 3

Produce 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.

Answer

Ford is providing owner and field reports in the electronic database contained in Appendix C in response to Request 1. A copy of the complaint, first notice, or MORS report relating to the matter shown on the Log of Lawsuits and Claims (Appendix C) is provided in Appendix E. To the extent information sought in Request 3 is available, it is provided in the referenced appendices.

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 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 information:

- 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;
- k. Comment, if any, by dealer/technician relating to claim and/or repair.
- l. Whether coil spring/ tire contact is alleged; and
- m. Whether a tire puncture is alleged.

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 sorted according to the categories described in the response to Request 1. The number and copies of relevant warranty claims identified in this search that may relate to the agency's investigation are provided in the AWS portion of the electronic database contained in Appendix C (filename: 2009-07-23 Appendix C.mdb). 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 also provided in Appendix C but are not included in the AWS count.

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 1. 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 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 4 are described in Appendix B.

For 2002 through 2007 model year Taurus/Sable 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 were provided previously in Ford's November 21, 2008, response to request 6 of the agency's September 30, 2008, EA08-018 information request [Appendix F (filenames: 2008-11-21 Appendix F (Taurus).pdf and 2008-11-21 Appendix F (Sable).pdf)].

Request 6

Produce 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.

Answer

Ford reported in its November 21, 2008, response to the agency that no Technical Service Bulletins (TSBs), Special Service Messages (SSMs), Internal Service Messages (ISMs), or Field Review Committee (FRC) field service action communications related to the alleged defect in the subject vehicles had been identified. Since that response, there have been no related messages or communications issued, and there are currently no plans to issue any in the next 120 days.

Request 7

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 in 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 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.

Answer

There are no new documents, responsive to this request, identified in our searches.

SUMMARY

The complaint data and our testing-to-date continue to show that the fracture of a front coil spring in the subject vehicles does not pose a risk of loss of vehicle control. The vast majority of front coil spring fractures occur at low speeds, such as negotiating ramps or aprons in driveways or parking lots, where the force on the spring is increased. Ford has received some reports where the vehicle operator was unaware that the vehicle had a fractured front coil spring until it was inspected for an unrelated purpose.

Further, evaluations of the real world data, in addition to our vehicle testing, continue to confirm that subject vehicles remain controllable even during spring fracture at higher speeds, even with associated tire damage. Only a small number of VOQ's report a front coil spring fracture at higher speeds. One of those VOQ's alleged that the vehicle went into a ditch as a consequence, but the report does not allege any vehicle damage. Because no report to Ford was made concerning the alleged event, we are unable to offer any further assessment of the allegation.

The agency reports 80 percent of the VOQ complainants allege that the broken coil spring punctured the adjacent tire. Because the vast majority of customer complaints are initiated by a desire for financial reimbursement, a customer whose vehicle also had collateral tire damage is more likely to complain to the agency than one who encountered a less costly repair in the hopes that Ford will take some action. A review of all reports to Ford finds approximately 50% of reports allege that the broken coil spring punctured the adjacent tire.

Subsequent to our last response to the agency Ford has received only one report arguably alleging an "accident" due to a front coil spring fracture; allegedly the vehicle went into a ditch. Again, there were no injuries and no vehicle damage. A hand written note from the claimant (filed with his legal case and included in Appendix E of this submission) stated, "I pulled out of the driveway, the left front tire blew", which would indicate that this was not a higher-speed event. The claimant did not even allege an accident in this hand written note, but simply requested reimbursement for the coil spring and tire repair.

As the agency is aware, Ford has spent considerable time and resources developing a method to simulate a tire puncture due to a fractured spring. A tool that was developed allows us to damage a tire under a variety of vehicle speeds and handling situations. For example, numerous times the inside sidewall of the tire was cut completely around the 360 degree circumference while the vehicle was traveling in excess of 60 mph, separating the sidewall from the rest of the tire. Even under these conditions there was no loss of control or even noticeable deviation from the vehicle's intended path, with only minor, low effort steering correction required, not unlike driving over bumpy roads or during windy conditions. The tire puncture, under these extreme conditions, was nearly identical to the most severe samples we found in tires returned from vehicles in service that had experienced a fractured spring and associated tire damage. We would be happy to have the agency participate in evaluations at our Dearborn test track. We understand that the agency is also conducting vehicle evaluations.

We would also be pleased to meet with agency personnel to review and discuss their independent testing and observations at any time.

As previously stated, our detailed review of real world data suggests front coil spring fractures in the subject vehicles should not present a risk of loss of vehicle control and does not present an unreasonable risk of accident or injury, even in the event that a fractured coil spring interacts with the vehicle tire. Ford recognizes that front coil spring fractures in 2002 and 2003 model year Taurus and Sable vehicles has resulted in significant customer dissatisfaction and in some cases high repair costs. Ford is deeply committed to the satisfaction of our customers and regrets any inconvenience this condition may cause. However, years of real world data and substantial vehicle testing indicate that the fracture of a front coil spring in the subject vehicles does not present an unreasonable risk of accident or injury, even in the event that the fractured spring damages a vehicle tire sidewall.

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