James P. Vondale. Director
Automotive Safety Office
Environmental & Safety Engineering

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

September 17, 2010

Mr. Richard P. Boyd, Acting Director
Office of Defects Investigation Safety Assurance
National Highway Traffic Safety Administration
1200 New Jersey Avenue, S.E. W45-302
Washington, DC 20590

Dear Mr. Boyd:

Subject: EA08-018:NVS-213kmb

On August 20, 2010, the agency requested that Ford Motor Company provide an update for owner and field reports, warranty claims, and lawsuit and claim information for Engineering Analysis EA08-018, which concerns allegations of front suspension coil spring fracture in 2002 through 2003 model year Ford Taurus and Mercury Sable vehicles. Ford's response to the agency's request is enclosed.

In response to this request, Ford gathered owner reports, field reports, and warranty claims, maintained by Ford Customer Service Division (FCSD), and searched claim and lawsuit information, maintained by Ford's Office of the General Counsel (OGC), from the date of the last search provided to the agency (December 14, 2009) through the date of the agency's current request (August 20, 2010). Consistent with previous responses, Ford searched 2002 through 2007 model year Ford Taurus and Mercury Sable vehicles.

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, field reports, and warranty claims, both responsive to the categories noted above and ambiguous, are provided in Appendix C.

Ford notes that some of the information being produced pursuant to this request 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).

Ford acknowledges that it has conducted previous coil spring actions as safety recalls involving earlier model year Taurus, Sable, Windstar, Contour, and Mystique vehicles, despite the absence of accidents and injuries. However, at the time of each of those actions Ford informed the agency, in each recall notification, that Ford did not consider spring fracture, even with tire puncture, to present an unreasonable risk of accident or injury. Ford testing that simulated a tire puncture due to a front coil spring fracture, the report data on Ford vehicles that are the subject of this current investigation, and the agency's recent closure of a similar investigation on Saab vehicles (EA08-026), continue to support these conclusions.

As the agency is aware, Ford spent considerable time and resources developing a method to simulate a tire puncture due to a fractured spring. Ford conducted extensive vehicle handling evaluations using this tool to puncture a tire under a variety of 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 in a curve; 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. Although we have not been provided with details or results, we believe the agency conducted similar testing. Insofar as we are aware, that testing did not produce any results materially different than those in the Ford testing.

More than half of all the reports of coil spring fracture in the Taurus and Sable vehicles, that are the subject of the agency's current investigation, do not involve air loss. If a coil spring fractures with no air loss, it does not affect the operation of the vehicle. In the agency's closing resume to EA08-026, the agency states that "...a front suspension coil spring fracture itself has little safety consequence, as evidenced by the minimal impact on vehicle ride and handling and by the number of drivers who were unaware of the failure condition for some time until alerted by service personnel." We concur with that conclusion.

If spring contact with a tire does occur and results in air loss, the data continue to confirm that it often occurs either while the vehicle is parked, or at low speed. In fact, the majority of reports that indicate some type of air loss on Taurus and Sable vehicles pertain to low speed conditions (e.g. driveways and parking lots), or even while the vehicle is stationary. Nevertheless, even if tire contact with rapid air loss does occur at higher speed, Ford's extensive vehicle evaluations, as discussed above, in addition to NHTSA FMVSS testing, have both consistently shown that passenger cars like the Taurus and Sable, with their low centers of gravity, remain controllable. Again, the data continue to support this conclusion.

The rate of coil spring fracture resulting in air loss in these 2002-2003 model year vehicles compares favorably to the rate on notably newer 2003-2006 model year Saab 9-3 vehicles, for which the agency recently closed its investigation without action. With this latest data update, Ford has provided reports for up to nine winters of vehicle operation (for the oldest of the 2002

model year vehicles), including the 2009-2010 winter. When adjusted for years in service (we believe the Saab data exclude reports for the 2009-2010 winter), the tire puncture rate on the 2002-2003 Taurus and Sable vehicles is actually less than the rate on the 2003-2006 Saab 9-3 vehicles. Given an average 96 months in service, the Ford rate of tire puncture is 44 per 100,000 vehicle years. With an average 60 months in service for the Saab vehicles, the tire puncture rate is 48 per 100,000 vehicle years.

More than 1.5 million subject Taurus and Sable vehicles have been in service for up to nine years and have accumulated tens of billions of miles. Ford has received a total of seven allegations of accidents related to front coil spring fracture in the subject vehicles; five of these were previously reported to the agency. Two accident allegations were received by Ford since our January 2010 update. One of these two reports was received in March 2010 and concerns an alleged event that occurred over two and one half years earlier (provided in Appendix E). A customer alleged that a front coil spring fracture on a 2002 Taurus punctured a front tire in September 2007 disabling the vehicle's brakes, resulting in a loss of control and crash, with a resulting injury. The contact was closed by Ford in July 2010 when the claimant failed to respond to Ford's attempts to gather additional information. A search of the Ford owner report system (MORS) found no contact with the owner of the vehicle associated with the VIN in this claim. Ford has insufficient information to speculate as to the nature of this September 2007 alleged accident, why the claimant waited two and a half years to file a claim, or why the claimant did not maintain contact after the first notice. The second new report is a MORS contact (included in Appendix C) that states, "There was a minor accident that didn't no [sic] result in any sort of property damage or personal damage – went to the dlr without the veh, and checked into the recall..." Though this incident was characterized as an "accident", there is no indication of spring contact with a tire or loss of air pressure, of any contact with another object or vehicle, and the customer stated there was no property or personal damage. It appears that this complaint may consider the spring fracture to be an "accident." Ford is also providing one additional ambiguous report that contains an allegation that a "strutt [sic] assembly broke," that the "tire near the area were shredded [sic]" and the vehicle "swerved and went into a ditch." It is not clear whether this report pertains to a coil spring, and if so, whether it was a front or rear spring. Nevertheless, this customer stated that no police report or insurance claim was filed. Similar to other Ford contacts, this claimant contacted Ford seeking financial assistance for the repair of the strut assembly with no reference to other vehicle damage or repair costs. No further contact has been received from this customer.

As stated in Ford's previous responses to the agency, the vast majority of reports to Ford, including allegations of accidents or loss of control, were established to pursue reimbursement for spring replacement and collateral damage. With this update, which includes up to nine years of vehicle operation, there is only one, non-specific allegation of an injury (discussed above). Further, there is no indication that any of the complainants filed insurance claims. Only one contact indicated that a police report was filed; and that individual only contacted Ford after discovering a broken front coil spring well after the alleged accident.

The accident and loss of control allegations do not contradict Ford's belief and vehicle testing as earlier described, or the agency's FMVSS testing that found the subject vehicle remains controllable, even with rapid air loss in a front tire. Further, Ford finds that allegations of loss of control are not unique to Ford vehicles. Review of VOQs associated with allegations of loss of control in Saab 9-3 vehicles finds them to be quite similar to allegations of loss of control in Taurus and Sable vehicles. In fact, the agency

acknowledged in the closing Saab resume that "[t]he small numbers of reports that allege deviation from the intended direction of travel, following a front coil spring fracture, are likely not vehicle induced, but rather the result of an improper driver response to a loss of air pressure in a front tire." We know of no reason that 2002-2003 Taurus and Sable vehicles would behave differently than the Saab 9-3 vehicles.

The allegations against Ford continue to suggest that customers are understandably aggravated by a condition that is covered under Ford warranty for certain customers and not others. And as discussed in Ford's previous responses, most of these allegations can be questioned as to whether they were indeed accidents, or at least, raise suspicion that they were unrelated to a fractured coil spring.

The preponderance of real world data on vehicles that are up to nine years old continue to support a conclusion that front coil spring fractures in the subject vehicles is not expected to result in any loss of vehicle control, even in the event that a fractured coil spring interacts with the vehicle tire. When considering time in service, the tire puncture rate on the 2002 through 2003 Taurus and Sable vehicles is actually lower than the tire puncture rate on the 2003 through 2006 Saab 9-3 vehicles, for which the agency recently closed their investigation without action. Ford recognizes that front coil spring fractures in 2002 through 2003 model year Taurus and Sable vehicles has resulted in significant customer dissatisfaction and in some cases high repair cost. However, despite the fact that front coil spring fractures have been addressed via safety recalls by Ford and other manufacturers in the past, there continues to be no credible evidence to establish or support that this condition presents any unreasonable risk of accidents or injury, as acknowledged in the agency's closing of EA08-026.

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

Sincerely,

James P. Vondale

Attachment

EA08-018

FORD

9-17-2010

Appendix E

ROBERT W. ROE
NATHAN H. BJERKE*+
KIMBERLY G. BEHM*
*ALSO ADMITTED IN WISCONSIN
+ALSO ADMITTED IN CALIFORNIA

CHAMPION LAW LLC
YOUR CASE OUR CAUSE

March 16, 2010

CERTIFIED MAIL 7009 2820 0004 0156 0912

Ford Motor Company
100 S 5th Street #1075
Minneapolis, MN 55402

FORD MOTOR COMPANY
RECEIVED
CLAIMS UNIT
MAR 19 2010
OFFICE OF THE
GENERAL COUNSEL

Re: Our Client: [redacted]s
Our File No.: 3744-10-02
D/Incident: September 13, 2007

Dear Sir or Madam:

Please be advised that our office has been retained to represent Elaine Marie Parsons for injuries she sustained on September 13, 2007.

Enclosed and service upon you by certified mail, as provided for in Stat. § 604.04, please find a Notice of Claim regarding the above-referenced matter. It is important that we receive the information requested in the Notice.

Very truly yours,

Nate H. Bjerke

NHB/mmm
Enclosure
cc: [redacted] w/out attachments)

NOTICE OF CLAIM
PURSUANT TO MINN. STAT. §604.04 SUBD. 1 (1998)

TO: C T CORPORATION SYSTEM INC AS AGENT FOR FORD MOTOR COMPANY, 100 S 5TH STREET #1075, MINNEAPOLIS, MN 55402.

Pursuant to Minn. Stat. §604.04, Subd. 1, [redacted] hereby presents a Notice of Claim against Ford Motor Company for serious injuries received on or about September 13, 2007 when a front coil spring on her 2002 Ford Taurus snapped, cutting open the tire, and disabling her brakes causing her to lose control and crash.

This incident occurred as a result of the carelessness and negligence of Ford Motor Company in the design, fabrication, manufacture, testing, inspection and sale of the 2002 Ford Taurus with a VIN of 1FAHP56SX2A[redacted].

In addition, this incident occurred as a result of the breach of express and implied warranties made by Ford Motor Company and the breach of, an absolute duty not to supply a defective vehicle which was unusually dangerous to the user.

[redacted]s hereby makes a claim against Ford Motor Company in an amount greater than Fifty Thousand and No/100ths ($50,0000.00) Dollars.

You are further notified that pursuant to Minn. Stat. §604.04, Subd. 1, [redacted] demands that you furnish to her through her attorneys, the names and addresses of all persons or entities in the chain of manufacture and distribution of the front coil springs on the subject 2002 Ford Taurus, and that a failure to do so will subject you to the penalties provided for in Minn. Stat. §604.04, Subd. 3 (1998).

Dated: 3/17/10

Nathan H. Bjerke