



Automotive Safety Office
Environmental and Safety Engineering

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June 19, 2009

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

Dear Ms. DeMeter:

Subject: RQ09-002:NVS-213kmb

The Ford Motor Company (Ford) response to the agency's May 7, 2009, letter concerning reports of alleged ABS module issues in 2001 through 2004 model year Escape vehicles remedied under Ford's safety recall 07S51 (NHTSA recall number 07V-056) is attached.

As the agency is aware, Ford voluntarily conducted safety recall 07S51 for certain 2001 through 2004 model year Ford Escape vehicles equipped with ABS. The recall was issued after an investigation found that some ABS wiring harnesses in the vehicles were manufactured with missing or mis-installed seals that could, over time, allow contaminants to enter the ABS electrical connector interface and cause corrosion of the electrical terminals. With additional time, the corrosion could result in an illuminated ABS warning indicator, an open fuse, and in some rare instances smoking, melting or burning of the electrical connector.

Through its normal course of business, Ford has closely monitored the implementation of this field service action (FSA) in order to verify that trends and observations used to develop the remedy were valid, and to look for any indication that the procedures were at all inadequate. Prior to the agency's inquiry Ford had been aware of a small number of reports involving illumination of ABS warning lights, localized connector melting, and fire. Based on photographs provided by dealers and a small number of parts that were obtained from the field, Ford believes that reports relating to post recall incidents result from improper or incomplete inspection of the connector wire seals.

Ford notes that many of the contacts relate to the cost of repair. In fact, several reports indicate that the vehicle was not fully insured at the time of the incident due to its age and mileage (where mileage information is available, the average vehicle mileage for these contacts is approximately 94,000 miles, including several that are over 150,000 miles). These contacts are typically motivated by a request for financial assistance rather than any safety concern, suggesting that any damage was minor.



The reports that allege any type of issue relating to this subject represent approximately 0.03 percent of the vehicles repaired as part of the FSA. This percentage is low and is not inconsistent with the small percentage of vehicles that are either misdiagnosed or repaired improperly for any concern. Based on this low rate and the very localized and repairable nature of the damage, Ford remains confident that the recall service procedure is appropriate and there is no associated unreasonable safety risk.

Along with a issuing a communication to dealers reemphasizing the importance of following proper seal inspection procedures, Ford also intends to continue monitoring reports to identify any other clarifications, changes or actions that are determined to be necessary.

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 RQ09-002

Ford's response to this Recall Query 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 Recall Query.

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.

In a May 13, 2009, telephone conversation, Mr. Kyle Bowker of the agency informed Ford personnel that the scope of the investigation would be limited to vehicles subject to NHTSA Recall Number 07V-156 that have had the recall action completed.

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 dated up to and including May 7, 2009, the date of your inquiry. Ford has searched within the following offices for responsive documents: Sustainability, Environment and Safety Engineering, Ford Customer Service Division, Research, Global Core Engineering, Office of the General Counsel, and North American Product Development.

Request 1

State, by model and model year, the number of subject vehicles Ford has manufactured for sale or lease in the United States. Separately, for each subject vehicle manufactured to date by Ford, state the following:

- a. Vehicle identification number (VIN);
- b. Make;
- c. Model;
- d. Model Year;
- e. Date of manufacture;
- f. Date warranty coverage commenced;
- g. Date subject recall repairs completed;
- h. Labor operation for subject recall repairs; and
- i. 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 I, Data Collection Disc, for a pre-formatted table which provides further details regarding this submission.

Answer

Ford records indicate that the approximate total number of 2001 through 2004 model year Ford Escape vehicles subject to NHTSA recall number 07V-156 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 446,460.

The requested data for each subject vehicle is provided in Appendix A. For part h. the following explanation of labor operation codes is provided.

Description	Labor Operation
PASSED INSPECTION: - Pass ABS module inspection. - Pass ABS harness connector inspection. - Apply electrical grease to ABS module connector cavity.	07S51A
PASS MODULE INSPECTION AND FAIL CONNECTOR INSPECTION (Missing Seals or Wrong Connector Number) - Install pig-tail connector and apply electrical grease to ABS module connector cavity. - Perform "Key-On" test.	07S51C
PASS MODULE INSPECTION AND FAIL CONNECTOR INSPECTION (Seals Out of Position): Seat seal(s) and apply electrical grease to ABS module connector cavity.	07S51D
FAIL MODULE INSPECTION (Corroded Connector Pins): - Install new ABS module. - Install pig-tail connector. - Apply electrical grease to ABS module connector cavity. - Perform "Key-On" test.	07S51E

INSTALL NEW MODULE (Interim Repair Was Performed): - Identify two yellow "X" marks on ABS cover indicating that the interim repair was performed. - Install new ABS module. - Apply electrical grease to ABS module connector cavity. - Perform "Key-On" test.	07S51F
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Labor operation code 07S51B was available for a short time at the beginning of the Field Service Action (FSA) to avert a potential shortage of ABS modules when the campaign was launched. This labor operation code was to be used when an ABS module was inspected and contamination was found, though the module was still functional and did not require immediate replacement. Repairs using this labor operation code included installation of a new pig-tail connector, application of dielectric grease and the module was marked with two yellow "X" marks. The vehicle owner was made aware of the interim repair and that they would be contacted to return for repair completion when modules were available. After a short period of time when an adequate supply of modules were in stock, this interim labor operation code was made unavailable; all vehicles that were subsequently identified as needing a new module received a complete repair at that time. Owners of vehicles identified as having the interim repair with labor operation code 07S51B were notified to return to their dealers to receive a new ABS module; those repairs were then completed using labor operation code 07S51F to finalize the FSA.

Vehicles that have not had an interim or final FSA repair completed are indicated with "unknown" for the labor operation code in Appendix A. Vehicles that have a blank labor operation code field (approximately 470 vehicles) have had the FSA completed, but there are special circumstances related to the repair such that the labor operation code was not provided. For example, some of the vehicles are included because they were originally sold in the United States, but the vehicles are now located in Russia where the FSA was completed and only a record that it was completed has been provided. Another example is that some vehicles were located in remote areas such as Alaska and only a request for reimbursement for the services at a remote location was provided.

Request 2

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:

- Consumer complaints, including those from fleet operators;
- Field reports, including dealer field reports;
- Reports involving a fire, 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;
- Property damage claims;
- Third-party arbitration proceedings where Ford is or was a party to the arbitration; and
- Lawsuits, both pending and closed, in which Ford is or was a defendant or codefendant.

For subparts "a" through "f," 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). 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 in Appendix B.

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

Category	Allegation
A1	Alleged under hood fire involving ABS module, post FSA, Key-off
A2	Alleged under hood fire involving ABS module, post FSA, Key-on
A3	Alleged under hood fire involving ABS module, post FSA, Key-ambiguous
B1	Alleged under hood fire, ambiguous if ABS module related, post FSA, Key-off
B2	Alleged under hood fire, ambiguous if ABS module related, post FSA, Key-on
B3	Alleged under hood fire, ambiguous if ABS module related, post FSA, Key-ambiguous
B4	Alleged vehicle fire with insufficient detail to determine the vehicle, source or origin

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 database contained in Appendix C. 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: Ford is providing, in Appendix B, a description of Legal Contacts and the activity that is responsible for this information. To the extent that responsive (i.e., not ambiguous) owner reports indicate that they are Legal Contacts, Ford has gathered the related files from the Office of General Counsel (OGC). Non-privileged documents for files that were located and related to the responsive owner reports are provided in Appendix D. Ford notes that it was unable to locate 23 files.

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 database contained in Appendix C. The categorization of each report is identified in the "Category" field.

When we were able to identify that responsive duplicate field 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. In addition, field reports that are duplicative of owner reports are provided in Appendix C but are not included in the field report count.

VOQ Data: This information request had an attachment that included six Vehicle Owner's Questionnaires (VOQs). Ford made inquiries of its MORS database for customer contacts, and its CQIS database for field reports regarding the vehicles identified in 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 database provided in Appendix C and have been identified by a "Y" in the "VOQ Dup" field.

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, and lawsuits and claims. Copies of reports corresponding to these alleged incidents are provided in the MORS section of the database provided in Appendix C and in the lawsuit and claim documents in Appendix F and are marked with a number in the "injury" field.

Claims, Lawsuits, and Arbitrations: For purposes of identifying incidents that may relate to the alleged defect, 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 categories described above. Ford has also located other lawsuits, claims or consumer breach of warranty lawsuits, each of which is ambiguous as to whether it meets the alleged defect criteria. We have included these lawsuits and claims as "non-specific allegations" for your review because of the broad scope of the request. Based on our engineering judgment, the information in these lawsuits and claims is insufficient to support a determination that they pertain to the alleged defect.

We are providing the requested detailed information, where available, on the responsive and ambiguous lawsuits and claims in our Log of Lawsuits and Claims, as Appendix E. The number of relevant lawsuits and claims identified is also provided in this log. To the extent available, copies of complaints, first notices, or MORS reports relating to matters shown on the log are provided in Appendix F. With regard to these lawsuits and claims, Ford has not

undertaken to contact outside law firms to obtain additional documentation. Ford notes that it was unable to locate three claim files and, therefore, is unable to determine if the cases are related to the alleged defect.

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:

- 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. Incident location;
- i. Report or claim date;
- j. Whether a vehicle fire is alleged;
- k. Whether a structure fire is alleged;
- l. Whether property damage is alleged;
- m. Number of alleged injuries, if any;
- n. Number of alleged fatalities, if any;
- o. Whether Ford received a subrogation claim regarding the incident (If so, please provide the name of the business and/or person who submitted the claim, their address, and telephone number;
- p. Whether a fire investigation was performed by any party, that Ford is aware of, to determine the origin and cause (if so, please provide a copy of the report);
- q. Alleged origin of the fire;
- r. Alleged cause of the fire;
- s. Whether the incident occurred with the engine "OFF" or the engine "ON";
- t. Ignition key position at time of incident;
- u. Complaint summary;
- v. Consumer comments; and
- w. Ford's assessment of the allegation, including causal and contributing factors and a summary of the significant underlying facts and evidence.

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 database contained in Appendix C in response to Request 2. To the extent information sought in Request 3 is available for owner and field reports, it is provided in the database. To the extent information sought in Request 3 is available for lawsuits and claims, it is provided in the Log of Lawsuits and Claims in Appendix E.

Request 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.

Answer

Ford is providing owner and field reports in the database contained in Appendix C in response to Request 2. Copies of complaints, first notices, or MORS reports relating to matters shown on the Log of Lawsuits and Claims (Appendix E) are provided in Appendix F. To the extent information sought in Request 4 is available, it is provided in the referenced appendices.

Request 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 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 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; and
- h. Comment, if any, 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 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 categorized in accordance with the categories described in the response to Request 2. 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 database contained in Appendix C. 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 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 the alleged defect 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.

Ford assumes that providing the warranty claims in the electronic database format meets the requirements of this request because the agency can review or order the claims as desired.

Request 6

Describe in detail the search criteria used by Ford to identify the claims identified in response to Request 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) 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 5 are described in Appendix B.

For 2001 through 2004 model year Ford Escape 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) are available to cover various vehicle systems, time in service and mileage increments. Ford understands this request to pertain to vehicles after the FSA was completed. Ford provides warranty for FSA repairs for defects or workmanship for a period of 12 months or 12,000 miles, whichever occurs first. There are no separate ESPs available for repairs completed as part of a FSA. If the agency desires additional information related to ESPs on the subject vehicles please advise.

Request 7

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

For purposes of identifying communications to dealers, zone offices, or field offices pertaining, at least in part, to post recall remedy procedure concerns related to 07V-156 (07S51), Ford has reviewed the following FCSD databases and files: The On-Line Automotive Service Information System (OASIS) containing Technical Service Bulletins (TSBs) and Special Service Messages (SSMs); Internal Service Messages (ISMs) contained in CQIS; and Field Review Committee (FRC) files. We assume this request does not seek information related to electronic communications between Ford and its dealers regarding the order, delivery, or payment for replacement parts, so we have not included these kinds of information in our answer.

A description of Ford's OASIS messages, ISMs, and the Field Review Committee files and the search criteria used are provided in Appendix B.

OASIS Messages: Ford has identified no SSMs and no TSBs that may relate to the alleged defect in the subject vehicles.

Internal Service Messages: Ford has identified no ISMs that may relate to the alleged defect in the subject vehicles.

Field Review Committee: Ford has identified no field service action communications that may relate to the alleged defect in the subject vehicles.

Ford Customer Service Division intends to issue a communication to dealers as described in response to Request 9 within the next 120 days.

Request 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 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

Ford is construing this request broadly and is providing not only studies, surveys, and investigations related to the alleged defect, but also notes, correspondence, and other

communications that were located pursuant to a diligent search for the requested information. Ford is providing the responsive non-confidential Ford documentation in Appendix G.

To the extent that the information requested is available, it is included in the documents provided. If the agency should have questions concerning any of the documents, please advise.

In the interest of ensuring a timely and meaningful submission, Ford is not producing non-responsive materials or items containing little substantive information. Examples of the types of materials not being produced are meeting notices, raw data lists (such as part numbers or VINs) without any analytical content, duplicate copies, non-responsive elements of responsive materials, and draft electronic files for which later versions of the materials are being submitted. Through this method, Ford is seeking to provide the agency with substantive responsive materials in our possession in the timing set forth for our response. We believe our response meets this goal. Should the agency request additional materials, Ford will cooperate with the request.

Request 9

Furnish Ford's assessment of the alleged defect in the subject vehicles, including:

- a. The causal or contributory factor(s);
- b. The failure mechanism(s);
- c. The failure mode(s);
- d. The risk to motor vehicle safety that it poses; and
- e. The reports included with this inquiry.

Answer

As the agency is aware, Ford voluntarily conducted safety recall 07S51 (NHTSA number 07V-156) for certain 2001 through 2004 model year Ford Escape vehicles equipped with ABS. The recall was issued after an investigation that found some ABS wiring harnesses in the vehicles were manufactured with missing or mis-installed seals that could, over time, allow contaminants to enter the ABS electrical connector interface and cause corrosion of the electrical terminals. With additional time, the corrosion could result in an illuminated ABS warning indicator, an open fuse, and in some rare instances smoking, melting or burning of the electrical connector.

The field service action required an inspection of the ABS electrical connector to identify any seal concerns and then provided various repair procedures depending on the inspection results. If the seal inspection identified that the seals were present and fully seated, dielectric grease was applied to the connector and the vehicle was returned to service. If seals were either missing or not fully seated, the ABS electrical connector area was inspected for any signs of contamination, corrosion or damage. If contamination, corrosion or damage were found, the ABS module and the harness connector were replaced. If seal issues were identified but there was no indication of contamination, corrosion or damage then the wiring harness connector was to be repaired either by simply fully seating the seals or replacing the connector.

Through its normal course of business, Ford has closely monitored the implementation of this FSA in order to verify that trends and observations used to develop the remedy were valid, and to look for any indication that the procedures were at all inadequate. Prior to the agency's

inquiry, Ford had been aware of a small number of reports involving illumination of ABS warning lights, localized connector melting, and fire. Some reports are not clear as to the actual observations. For instance, some warranty repairs state only "repair burnt connector" without any further clarification of the actual event after completion of the FSA repair. All of the reports identified and reviewed in response to this information request relate to vehicles repaired using labor operation code 07S51A, meaning the technician deemed that neither the ABS module nor connector needed to be repaired or replaced. Ford identified no reports of allegations on vehicles that were repaired using any other labor operation code.

Based on photographs provided by dealers and a small number of parts that were obtained from the field, Ford believes that reports relating to post recall incidents result from improper or incomplete inspection of the connector seals. In some cases when the event occurred within a few weeks after the recall completion, a subsequent analysis of the components found evidence of corrosion and improper seal installation. It is likely that the seal issue and corrosion had not been properly diagnosed at the time of the initial recall inspection. While it is desirable that all repairs performed by every technician, for any concern, are thorough and complete, it can be expected that a small percentage involve either misdiagnosis, or incomplete or improper repair. Repairs performed on several hundred thousand vehicles by thousands of individual technicians, are no different. Nevertheless, Ford will issue a communication to dealers reaffirming the importance of completely and thoroughly following the instructions provided in the FSA.

The reports relating to this inquiry typically involve only minor damage that was easily repaired. The photographs and reports indicate that the post recall events are typically very localized and are contained within the immediate area of the ABS components. In fact, of reports on 65 vehicles that are alleged to have experienced a smoking, melting, or fire condition following completion of the FSA, 61 were clearly repaired and returned to service. The other four have unclear final disposition. The vehicle identified by VIN 1FMYU04142KB85540 had been issued a "Salvaged/Rebuilt title" in December, 2004, (prior to the original FSA). The physical condition of the vehicle is unclear at the time of the alleged fire in September, 2008, and another "Salvage Title/Certificate" was issued in January, 2009. The vehicle identified by VIN 1FMYU93133KB54240 was reported to both Ford and the agency as a "total loss." The vehicle owner alleged that the vehicle insurer was informed by Ford that parts were no longer available to repair the vehicle. Ford has not been able to locate any information indicating that this vehicle has been removed from service, scrapped or salvaged. In fact, the Ford dealership that had been servicing this vehicle until shortly before the alleged event has no record of any contact by the owner after the alleged event. Ford is unable to confirm the conversation or the customer's allegation, however; it is noteworthy that the vehicle was apparently repairable if parts were located. While it is unclear whether the vehicle insurer repaired or scrapped this vehicle, Ford has not received any subrogation claim alleging a product defect on this vehicle. Ford has no information regarding final disposition of the other two vehicles.

Though a few reports that Ford is providing in this response indicate more extensive vehicle damage, these reports are typically ambiguous in nature and are unclear whether they relate to this subject. For example, the claim related to VIN 1FMCU93114KA52124 indicates the vehicle had been experiencing electrical issues (frequently drained battery and ABS warning light) for some period of time prior to the fire. The vehicle owner reported first seeing flames in the passenger compartment. An investigator reportedly confirmed this statement by the owner and indicated that the inspection supported this observation since the heaviest heat damage appeared to be in the passenger compartment. However, the investigator also said that since he was aware of the subject ABS recall he could "not rule that out."

A number of reports mention the vehicle had either an ABS warning light or some other indication prior to the event. For example, the VOQ related to VIN 1FMYU04181KB59750 concludes with "[t]he ABS light had been going off and on recently." Ford identified two owner reports related to this event that were received several weeks prior to the date of the VOQ, though none of the contacts to Ford mention the ABS light, or even allege that the fire began in the engine compartment. The VOQ related to VIN 1FMYU04192KA3760 also reports an ABS warning indicator illuminated for some period prior to the fire. The owner report related to VIN 1FMYU03162KA70214 indicates the owner observed the ABS warning light "had been on for a month or so."

Ford notes that many of the contacts relate to the cost of repair. In fact, several reports indicate that the vehicle was not fully insured at the time of the incident due to its age and mileage (where mileage information is available, the average vehicle mileage for these contacts is approximately 94,000 miles, including several that are over 150,000 miles). These contacts are typically motivated by a request for financial assistance rather than any safety concern, suggesting that any damage was minor.

Ford did not identify any allegations of damage to structures, and only two reports allege minor injury; one "a little burned" and one report of smoke inhalation. Both were reported to have occurred while extinguishing a fire, but Ford does not have any further information indicating whether medical treatment was sought.

The reports that allege any type of issue relating to this subject represent approximately 0.03 percent of the vehicles repaired as part of the FSA. This percentage is low and is not inconsistent with the small percentage of vehicles that are either misdiagnosed or repaired improperly for any concern. Based on this low rate and the very localized and repairable nature of the thermal damage, Ford remains confident that the recall service procedure is appropriate and there is no associated unreasonable safety risk.

Along with issuing a communication to dealers reemphasizing the importance of following proper seal inspection procedures, Ford also intends to continue monitoring reports to identify any other clarifications, changes or actions that are determined to be necessary.

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