



U.S. Department
of Transportation

**National Highway
Traffic Safety
Administration**

1200 New Jersey Avenue SE.
Washington, DC 20590

MAY - 4 2010

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. James Vondale, Director
Automotive Safety Office
Environmental and Safety Compliance
Ford Motor Company
330 Town Center Drive, Suite 400
Dearborn, MI 48126

NVS-212pco
EA10-001

Dear Mr. Vondale:

This letter responds to the April 22, 2010, letter from you on behalf of the Ford Motor Company ("Ford") regarding the March 23, 2010, information request ("IR") from the National Highway Traffic Safety Administration ("NHTSA" or "Agency"). The IR sought information from Ford regarding allegations of inadvertent air bag deployment in certain model year ("MY") 2004-2006 F-150 series vehicles and other vehicles manufactured by Ford.

In the IR, the Agency identified the MY 2004-2006 F-150/F-150 Heritage/MARK LT vehicles, the MY 2002-2005 Explorer/Explorer Sport Trac/Mountaineer vehicles, and the MY 2003-2004 Aviator vehicles as subject vehicles. The Agency identified these vehicles as being equipped with a driver-side frontal 2-stage inflator air bag module connected to the clockspring assembly (Engineering PN 4L2T-14A664-XX) as used in the MY2004 F-150 vehicle. In the IR, the Agency also sought information regarding related peer vehicles manufactured by Ford with a similar 2-stage inflator design and clockspring assembly ("subject peer component"). The Agency requested information on all Light Truck ("LT") and Multi-Purpose Vehicles ("MPV") manufactured by Ford equipped with the subject peer component ("subject peer vehicles").

In your letter, you stated that Ford's review of the IR revealed that certain vehicle models originally listed in the IR do not contain an air bag design that meets the Agency's definition of either the subject component or subject peer component. You state that certain requested subject vehicles and subject peer vehicles are equipped with a single-stage air bag, and not a 2-stage air bag design. Furthermore, you state that certain requested subject peer vehicles are either passenger cars or contain a fixed horn plate design.

Ford proposed to exclude four requested subject vehicle models from Ford's IR response. In addition, Ford proposed that ten requested subject peer vehicle models be excluded from Ford's IR response.



In light of the information provided by Ford, including photographs of the different air bag modules in the requested vehicles, the Agency's Office of Defects Investigation ("ODI") determined that certain listed vehicle models would not meet the subject vehicle definition in the IR. The excluded subject vehicles are equipped with a single-stage air bag design, and are configured differently than the requested 2-stage inflator, floating horn plate air bag module. The revised subject vehicle models that Ford must provide information on are the MY 2004-2006 F-150, the MY 2004-2006 Mark LT, the MY 2002.5-2005 Explorer, the MY 2002.5-2005 Mountaineer, and the MY 2003-2004 Aviator.

The Agency also agrees to exclude certain subject peer vehicle models. These vehicles have a different horn plate design (fixed versus floating), and, in one instance, is a passenger car, not a LT or MPV. The revised subject peer vehicle models are the MY 2007 F-150, MY 2007 Mark LT, and the MY 2004-2006 Navigator.

A copy of the April 22, 2010, letter has been enclosed with this response. With the exception of the changes outlined in the previous paragraphs, there are no other modifications to the March 23, 2010 IR.

If Ford finds that it is unable to provide all of the information requested within the time allotted, Ford must request an extension from Mr. D. Scott Yon at (202) 366-0139 no later than five business days before the response due date. If Ford is unable to provide all of the information requested by the above deadlines, it must submit a partial response by the above deadlines with whatever information Ford then has available, even if an extension has been granted.

Please send email notification to Peter Ong (peter.ong@dot.gov) and to ODI_IRresponse@dot.gov when Ford sends its response to this office and indicate whether there is confidential information as part of Ford's response.

Sincerely,



Richard Boyd, Acting Director
Office of Defects Investigation
Enforcement

Enclosure



OFFICE OF DEFECTS &
INVESTIGATIONS

2010 APR -0 A 10: 36

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

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

April 22, 2010

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

Dear Ms. DeMeter:

Subject: EA10-001:NVS-212pco

In an April 19, 2010, telephone call, Ford Motor Company representatives and Scott Yon and Peter Ong of the agency discussed the agency's definition of the "alleged defect or the alleged problem condition" and the vehicles that are to be included in the subject and subject peer vehicle populations for EA10-001. Ford also reviewed the driver frontal air bag designs for the subject and peer vehicle populations as specified in the agency's letter dated March 23, 2010.

In the March 23, 2010, information request for EA10-001, the agency defined the "alleged defect or problem condition" as:

The illumination of the air bag light² or the inadvertent deployment of the driver side frontal air bag³.

²Ford identifies this as category A2 in the IR response to NHTSA letter of 09/19/09.

³Ford identifies this as categories A1 and B1 in the IR response to NHTSA letter of 9/19/09.

The agency indicated that the footnotes are intended to clarify that the alleged defect or problem condition relates to *air bag wiring chafing/shorting* resulting in the inadvertent deployment of the driver side frontal air bag or the illumination of the air bag light.

In addition, the agency's information request defined the subject and peer vehicle populations as Light Truck (LT) and Multi-Purpose Vehicles (MPV) equipped with 2-stage driver frontal air bags. During the April 19, 2010, telephone call, Ford reviewed the driver side frontal air bag designs in the agency's list of subject and peer vehicles and informed the agency that the following vehicles do not meet the agency's definitions for the reasons identified in the following table.



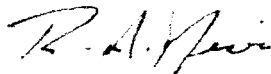
Vehicles Outside of Scope			
Subject/Peer Population	Vehicle	Affected MY's	Reason
Subject	F-150 Heritage	2004	Equipped with a Single Stage Air Bag
Subject	Explorer Mountaineer	2002 - 2002.5	Equipped with a Single Stage Air Bag
Subject	Explorer Sport Trac	2002 - 2005	Equipped with a Single Stage Air Bag
Subject	Explorer Sport	2002 - 2003	Equipped with a Single Stage Air Bag
Peer	Montego	2005 - 2006	Defined as a Passenger Car
Peer	E-150, E-250, E-350	2004 - 2006	Equipped with a Single Stage Air Bag
Peer	Escape Escape HEV	2004	Equipped with a Single Stage Air Bag
		2005 - 2006	2-Stage Air Bag no Horn Plates
Peer	Mariner Mariner HEV	2005 - 2006	2-Stage Air Bag no Horn Plates
Peer	Excursion	2004 - 2005	Equipped with a Single Stage Air Bag
Peer	Expedition	2004 - 2006	2-Stage Air Bag no Horn Plates
Peer	F-250, F-350	2004 - 2006	Equipped with a Single Stage Air Bag
Peer	Freestar Monterey	2004 - 2006	2-Stage Air Bag no Horn Plates
Peer	Freestyle	2005 - 2006	2-Stage Air Bag no Horn Plates
Peer	Ranger	2004 - 2006	Equipped with a Single Stage Air Bag

Additionally, Ford and the agency reviewed photographs and the driver air bag designs for the remaining subject and peer vehicle populations equipped with 2-Stage driver frontal air bags. In particular, Ford informed the agency that the 2004 through 2007 model year F-150 is equipped with a driver frontal air bag module that incorporates the supplemental inflatable restraint and horn switch functions in a single assembly. After the review, the agency indicated that our response should include the following vehicles, model years, and driver side frontal air bag designs.

Subject & Peer Vehicles			
Population	Vehicle	Affected MY's	Rationale
Subject	F-150	2004 - 2006	• 2-Stage Air Bag with Horn Plates
	Mark LT		
	Explorer	2002.5 – 2005	• 2-Stage Air Bag no Horn Plates
	Mountaineer		
Aviator	2003 - 2004	• Similar Clockspring	
Peer	F-150	2007	• Revised 2-Stage Air Bag
	Mark LT		• Revised Clockspring
	Navigator	2004 – 2006	• 2-Stage Air Bag with Horn Plates

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

Sincerely,



James P. Vondale