



MAR 13 2011

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

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

March 11, 2011

Mr. Frank S. Borris, Director
Office of Defects Investigation
National Highway Traffic Safety Administration
1200 New Jersey Avenue SE, Room W45-302
Washington, DC 20590

Dear Mr. Borris:

Subject: EA10-001:NVS-212pco

The Ford Motor Company (Ford) response to the agency's February 18, 2011 letter requesting additional information pertaining to the subject Engineering Analysis is attached.

On February 25, 2011, Ford requested an extension of the agency's due date for the request. In a February 25, 2011 email, the agency directed Ford to provide responses to Questions 1 through 6 by March 4, 2011, and responses to the remaining questions by March 11, 2011. Accordingly, Ford is providing responses to Questions 7 through 9 as an attachment to this letter.

Please feel free to contact me if you have any questions concerning this response.

Sincerely,

James P. Vondale

Attachment



FORD MOTOR COMPANY (FORD) RESPONSE SUPPLEMENT TO EA10-001

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.

In a February 22, 2011 telephone conversation, Peter Ong of the agency informed Ford personnel that the scope of the investigation would be limited to 2004 through 2006 model year Ford F-150, 2006 model year Lincoln Mark LT, 2002.5 through 2005 model year Ford Explorer, 2002.5 through 2005 model year Mercury Mountaineer, and 2003 through 2004 model year Lincoln Aviator vehicles.

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 agency's request for information, followed by our response. Unless otherwise stated, Ford has undertaken to provide responsive documents dated up to and including February 18, 2011, the date of your inquiry. Ford has searched within the following offices for responsive documents: Environment and Safety Engineering, Ford Customer Service Division, North American Product Development.

Request 7

For each vehicle VIN identified in Request No. 1, provide the assembly plant work shift period and the name of the assembly plant from which the vehicle was manufactured. This information can be supplied in an updated "Q1_PRODDATA.accdb" file or separately in a Microsoft Access 2007, or a compatible format, entitled "Q7_PLANTID.accdb"

Answer

The assembly plant from which the vehicle was manufactured can be identified from the eleventh character in the VIN. The vehicle line, VIN code, and assembly plant are summarized in the table below.

Vehicle	Model Year	VIN Position 11	Assembly Plant
F-150	2004 - 2006	F K N	Dearborn: Dearborn, Michigan Kansas City: Kansas City, Missouri Norfolk: Norfolk, Virginia
Mark LT	2006	F	Dearborn: Dearborn, Michigan
Explorer	2002.5 - 2005	U Z	Louisville: Louisville, Kentucky (Lt Truck) St. Louis: Hazelwood, Missouri
Mountaineer	2002.5 - 2005	U Z	Louisville: Louisville, Kentucky (Lt Truck) St. Louis: Hazelwood, Missouri
Aviator	2003 - 2004	Z	St. Louis: Hazelwood, Missouri

Ford is providing driver frontal airbag scan date and times (i.e., the approximate time at which the driver frontal air bag has installed into the steering wheel) by VIN, where available, in Appendix F. Although we do not have precise shift time records during the 2004 to 2006 calendar years, these assembly plants were typically operating 10 hour shifts, with Shift 1 beginning at 6:00 am and ending at 4:30 pm and Shift 2 typically beginning at 4:00 pm.

Request 8

Identify any replacement parts or products (e.g. horn plates, wire jumpers, flocked tape, protective sleeves for wires) ordered, requested, or developed in conjunction with the alleged defect in the subject vehicles which Ford has considered using or may use to remedy the alleged defect, including, but not limited to:

- a. The name of the supplier for the parts or products (name, address, phone number, and point of contact);
- b. The cost of the parts or products;
- c. The date Ford first contacted each supplier to request the parts or products;
- d. The date the production of the parts or products began;
- e. The number of parts or products Ford has in its possession; and
- f. The number of parts or products Ford anticipates receiving.

Answer

As previously stated in Ford's response dated January 14, 2011, Ford initiated the development of a clockspring jumper wire service kit in January 2010. The service kit (P/N: 4L3Z-14B095-A) consists of a clockspring jumper wire with Bentley-Harris wire protection. The suggested retail price for the clockspring jumper wire service kit is \$10.17; however, dealerships are independently owned and operated, and, accordingly, retail prices may vary. Ford had 250,000 service kits in its possession as of February 7, 2011.

The supplier contact information is provided below.

Sterling Technologies Inc.
2035 Easy Street
Commerce Township, Michigan 48390
Phone: (248) 669-0334
Contact: Joel M. Rosenberg

Request 9

Produce copies of all communications sent from or received by Ford that relate to or may relate to the alleged defect; including but not limited to such communications between employees and/or entities within Ford and between Ford and its suppliers and lower tiers of the suppliers, including, but not limited to Autoliv Electronics, TRW Vehicle Safety System Inc., Methode Electronics, Bentley Harris, and all replacement part suppliers (e.g. suppliers of horn plates, wire jumpers, flocked tape, and protective sleeves for wires).

Answer

Ford is construing this request broadly and is providing communications that were located pursuant to a diligent search for the requested information. Ford has undertaken to provide responsive documents dated from March 28, 2010, the date of your initial EA10-001 information request, up to and including February 18, 2011, the date of your inquiry. Any communications prior to March 28, 2010, would have been provided in our May 14, 2010, response. The communications being provided herein primarily concern two subjects: the gathering of information to respond to the agency's questions during the course of the PE and EA information requests and the design, development, and manufacture of the clockspring jumper wire service kit. Ford is providing the responsive non-confidential Ford documentation in Appendix G.

Ford is submitting additional responsive documentation in Appendix H with a request for confidentiality under separate cover to the agency's Office of the Chief Counsel pursuant to 49 CFR, Part 512.

Ford is not producing documents responsive to this request that are protected from disclosure by attorney-client privilege, work-product doctrine or other applicable immunity. Documents protected from disclosure on these bases are described in a privilege log contained in Appendix J.

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EA10-001

FORD

3/11/2011

Appendix J

EA10-001 Supplement - Privilege Log

Bates Range	Document Type	Document Author(s)	Document Recipient(s)	Document cc's	Document Date	Document Description	Privilege (Basis of Claim)
EA10-001.9 000583-000584	Email	Gary Lang, Ford Employee	Jay Logel, Office of the General Counsel Attorney; Francis Wickenheiser, Ford Employee		2/15/2011	E-mail correspondence between Ford Employee and Ford's Office of the General Counsel requesting legal advice. Produced in redacted form.	Attorney Client Privilege
EA10-001.9 000585-000587	Email	(1) Gary Lang, Ford Employee; (2) Gary Lang, Ford Employee; (3) Emily Frascaroli, Office of the General Counsel Attorney; (4) Amanda Prescott, Ford Employee; (5) Emily Frascaroli, Office of the General Counsel Attorney; (6) Gary Lang, Ford Employee	(1) Jay Logel, Office of the General Counsel Attorney; Francis Wickenheiser, Ford Employee; (2) Emily Frascaroli, Office of the General Counsel Attorney; (3) Gary Lang, Ford Employee; (4) Emily Frascaroli, Office of the General Counsel Attorney; Gary Lang, Ford Employee; (5) Amanda Prescott, Ford Employee; Gary Lang, Ford Employee; (6) Emily Frascaroli, Office of the General Counsel Attorney; Amanda Prescott, Ford Employee	(2) Amanda Prescott, Ford Employee; (3) Amanda Prescott, Ford Employee	(1) 2/15/2011; (2) 2/16/2001; (3) 2/16/2011; (4) 2/16/2011; (5) 2/16/2011; (6) 2/16/2011	E-mail correspondence between Ford Employee and Ford's Office of the General Counsel requesting legal advice. Produced in redacted form.	Attorney Client Privilege/Attorney Work Product
EA10-001.9 000588-000589	Email	Michelle Hull, Office of the General Counsel Product Claims Analyst	Patrick Culkeen, Ford Employee; Tina Revoir, Office of the General Counsel Claims Analyst		8/27/2010	E-mail correspondence between Ford's Office of the General Counsel and Ford Employee regarding legal claim. Produced in redacted form.	Attorney Client Privilege
EA10-001.9 000590	Email	Jay Logel, Office of the General Counsel Attorney	Amanda Prescott, Ford Employee; Sharon Welch, Ford Employee	Patrick Culkeen, Ford Employee; Raymond Nevi, Ford Employee; Todd Fronckowiak, Ford Employee	2/11/2011	E-mail correspondence between Ford Employee and Ford's Office of the General Counsel providing legal advice. Produced in redacted form.	Attorney Client Privilege

EA10-001 Supplement - Privilege Log

Bates Range	Document Type	Document Author(s)	Document Recipient(s)	Document cc's	Document Date	Document Description	Privilege (Basis of Claim)
EA10-001.9 000906-000907	Email	Gary Lang, Ford Employee	Jay Logel, Office of the General Counsel Attorney; Francis Wickenheiser, Ford Employee		2/15/2011	E-mail correspondence between Ford Employee and Ford's Office of the General Counsel requesting legal advice. Produced in reacted form.	Attorney Client Privilege
EA10-001.9 000908-000917	Email with attachment	(1) Gary Lang, Ford Employee; (2) Gary Lang, Ford Employee; (3) Emily Frascaroli, Office of the General Counsel Attorney	(1) Jay Logel, Office of the General Counsel Attorney; Francis Wickenheiser, Ford Employee; (2) Emily Frascaroli, Office of the General Counsel Attorney; (3) Gary Lang, Ford Employee	(2) Amanda Prescott, Ford Employee; (3) Amanda Prescott, Ford Employee	(1) 2/15/2011; (2) 2/16/2001; (3) 2/16/2011	E-mail correspondence between Ford Employee and Ford's Office of the General Counsel requesting and receiving legal advice. Produced in reacted form.	Attorney Client Privilege
EA10-001.9 000918-000919	Email	Gary Lang, Ford Employee	Jay Logel, Office of the General Counsel Attorney; Francis Wickenheiser, Ford Employee		2/15/2011	E-mail correspondence between Ford Employee and Ford's Office of the General Counsel requesting legal advice. Produced in reacted form.	Attorney Client Privilege
EA10-001.9 001467-001469	Email	Sharon Welch, Ford Employee	Patrick Culkeen, Ford Employee	Amanda Prescott, Ford Employee	2/11/2011	E-mail correspondence between Ford Employees reflecting legal advice from Ford's Office of the General Counsel. Produced in Redacted Form	Attorney Client Privilege
EA10-001.9 001485	Email	Jay Logel, Office of the General Counsel Attorney	Amanda Prescott, Ford Employee		2/4/2011	E-mail correspondence between Ford's Office of the General Counsel and a Ford Employee providing legal advice. Produced in reacted form.	Attorney Client Privilege

EA10-001 Supplement - Privilege Log

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EA10-001.9 001486-001491	Email with attachment	Jay Logel, Office of the General Counsel Attorney	Raymond Nevi, Ford Employee; Todd Fronckowiak, Ford Employee; Patrick Culkeen, Ford Employee; Amanda Prescott, Ford Employee; Thomas Falahee, Office of the General Counsel Attorney		2/3/2011	E-mail correspondence between Ford's Office of the General Counsel and Ford Employees providing legal advice. Produced in redacted form.	Attorney Client Privilege/Attorney Work Product
EA10-001.9 001764-001768	Email with attachment	Jay Logel, Office of the General Counsel Attorney	Raymond Nevi, Ford Employee; Patrick Culkeen, Ford Employee; Amanda Prescott, Ford Employee		1/27/2011	E-mail correspondence between Ford's Office of the General Counsel and Ford Employees providing legal advice.	Attorney Client Privilege/Attorney Work Product
EA10-001.9 001769	Email	(1) Amanda Prescott, Ford Employee; (2) Amanda Prescott, Ford Employee	(1) Jay Logel, Office of the General Counsel Attorney; (2) Jay Logel, Office of the General Counsel Attorney	(1) Patrick Culkeen, Ford Employee; (2) Patrick Culkeen, Ford Employee	(1) 1/31/2011; (2) 1/31/2011	E-mail correspondence between Ford Employee and Ford's Office of the General Counsel requesting and relaying legal advice.	Attorney Client Privilege
EA10-001.9 001770-001785	Email with attachment	(1) Amanda Prescott, Ford Employee; (2) Jay Logel, Office of the General Counsel Attorney	(1) Jay Logel, Office of the General Counsel Attorney; (2) Raymond Nevi, Ford Employee	(1) Raymond Nevi, Ford Employee; (2) Amanda Prescott, Ford Employee	(1) 2/8/2011; (2) 2/9/2011	E-mail correspondence between Ford Employee and Ford's Office of the General Counsel requesting and receiving legal advice.	Attorney Client Privilege/Attorney Work Product

EA10-001 Supplement - Privilege Log

Bates Range	Document Type	Document Author(s)	Document Recipient(s)	Document cc's	Document Date	Document Description	Privilege (Basis of Claim)
EA10-001.9 001786-001787	Email	(1) Jay Logel, Office of the General Counsel Attorney; (2) Amanda Prescott, Ford Employee; (3) Jay Logel, Office of the General Counsel Attorney; (4) Patrick Culkeen, Ford Employee; (5) Jay Logel, Office of the General Counsel Attorney; (6) Patrick Culkeen, Ford Employee	(1) Amanda Prescott, Ford Employee; Patrick Culkeen, Ford Employee; (2) Jay Logel, Office of the General Counsel Attorney, Patrick Culkeen, Ford Employee; (3) Amanda Prescott, Ford Employee; Patrick Culkeen, Ford Employee; (4) Jay Logel, Office of the General Counsel Attorney; Amanda Prescott, Ford Employee; (5) Patrick Culkeen, Ford Employee; Amanda Prescott, Ford Employee; (6) Jay Logel, Office of the General Counsel Attorney; Amanda Prescott, Ford Employee		(1) 2/7/2011; (2) 2/7/2011; (3) 2/7/2011; (4) 2/7/2011; (5) 2/7/2011; (6) 2/7/2011	E-mail correspondence between Ford Employee and Ford's Office of the General Counsel related to legal advice.	Attorney Client Privilege
EA10-001.9 001788	Email	(1) Jay Logel, Office of the General Counsel Attorney; (2) Raymond Nevi, Ford Employee; (3) Jay Logel, Office of the General Counsel Attorney	(1) Raymond Nevi, Ford Employee; (2) Jay Logel, Office of the General Counsel Attorney; (3) Raymond Nevi, Ford Employee	(1) Thomas Falahee, Office of the General Counsel Attorney; (2) Thomas Falahee, Office of the General Counsel Attorney; Amanda Prescott, Ford Employee; (3) Thomas Falahee, Office of the General Counsel Attorney; Amanda Prescott, Ford Employee	(1) 2/9/2011; (2) 2/9/2011; (3) 2/9/2011	E-mail correspondence between Ford's Office of the General Counsel and Ford Employees requesting and providing legal advice.	Attorney Client Privilege

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Bates Range	Document Type	Document Author(s)	Document Recipient(s)	Document cc's	Document Date	Document Description	Privilege (Basis of Claim)
EA10-001.9 001789-001790	Email	(1) Amanda Prescott, Ford Employee; (2) Emily Frascaroli, Office of the General Counsel Attorney; (3) Sharon Welch, Ford Employee	(1) Jim Chascsa, Ford Employee; Emily Frascaroli, Office of the General Counsel Attorney; (2) Amanda Prescott, Ford Employee; Jim Chascsa, Ford Employee; (3) Emily Frascaroli, Office of the General Counsel Attorney; Amanda Prescott, Ford Employee; Jim Chascsa, Ford Employee	(1) Sharon Welch, Ford Employee; Patrick Culkeen, Ford Employee; (2) Sharon Welch, Ford Employee; Patrick Culkeen, Ford Employee; Thomas Falahee, Office of the General Counsel Attorney (3) Patrick Culkeen, Ford Employee; Thomas Falahee, Office of the General Counsel Attorney; Tom Bazil, Ford Employee; Gary Lang, Ford Employee; Sharon Welch, Ford Employee	(1) 2/15/2011; (2) 2/15/2011; (3) 2/15/2011	E-mail correspondence between Ford Employee and Ford's Office of the General Counsel requesting and receiving legal advice.	Attorney Client Privilege
EA10-001.9 001791-001794	Email with attachment	(1) Amanda Prescott, Ford Employee; (2) Emily Frascaroli, Office of the General Counsel Attorney	(1) Jim Chascsa, Ford Employee; Emily Frascaroli, Office of the General Counsel Attorney; (2) Amanda Prescott, Ford Employee; Jim Chascsa, Ford Employee	(1) Sharon Welch, Ford Employee; Patrick Culkeen, Ford Employee; (2) Sharon Welch, Ford Employee; Patrick Culkeen, Ford Employee; Thomas Falahee, Office of the General Counsel Attorney	(1) 2/15/2011; (2) 2/15/2011	E-mail correspondence between Ford Employee and Ford's Office of the General Counsel requesting and receiving legal advice.	Attorney Client Privilege

EA10-001 Supplement - Privilege Log

Bates Range	Document Type	Document Author(s)	Document Recipient(s)	Document cc's	Document Date	Document Description	Privilege (Basis of Claim)
EA10-001.9 001795-001797	Email	(1) Amanda Prescott, Ford Employee; (2) Emily Frascaroli, Office of the General Counsel Attorney; (3) Amanda Prescott, Ford Employee; (4) Emily Frascaroli, Office of the General Counsel Attorney; (5) Amanda Prescott, Ford Employee; (6) Thomas Falahee, Office of the General Counsel Attorney; (7) Amanda Prescott, Ford Employee; (8) Emily Frascaroli, Office of the General Counsel Attorney; (9) Amanda Prescott, Ford Employee	(1) Jim Chascsa, Ford Employee; Emily Frascaroli, Office of the General Counsel Attorney; (2) Amanda Prescott, Ford Employee; Jim Chascsa, Ford Employee; (3) Emily Frascaroli, Office of the General Counsel Attorney; (4) Amanda Prescott, Ford Employee; Thomas Falahee, Office of the General Counsel Attorney; (5) Emily Frascaroli, Office of the General Counsel Attorney; Thomas Falahee, Office of the General Counsel Attorney; (6) Amanda Prescott, Ford Employee; Emily Frascaroli, Office of the General Counsel Attorney; (7) Thomas Falahee, Office of the General Counsel Attorney; Emily Frascaroli, Office of the General Counsel Attorney; (8) Amanda Prescott, Ford Employee; Thomas Falahee, Office of the General Counsel Attorney; (9) Emily Frascaroli, Office of the General Counsel Attorney; Thomas Falahee, Office of the General Counsel Attorney	(1) Sharon Welch, Ford Employee; Patrick Culkeen, Ford Employee; (2) Sharon Welch, Ford Employee; Patrick Culkeen, Ford Employee; Thomas Falahee, Office of the General Counsel Attorney	(1) 2/15/2011; (2) 2/15/2011; (3) 2/15/2011; (4) 2/15/2011; (5) 2/15/2011; (6) 2/15/2011; (7) 2/15/2011; (8) 2/16/2011; (9) 2/16/2011	E-mail correspondence between Ford Employee and Ford's Office of the General Counsel requesting legal advice.	Attorney Client Privilege

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EA10-001.9 001798-001807	Email with attachment	Jay Logel, Office of the General Counsel Attorney	Raymond Nevi, Ford Employee; Todd Fronckowiak, Ford Employee; Thomas Falahee, Office of the General Counsel Attorney; Patrick Culkeen, Ford Employee; Amanda Prescott, Ford Employee		2/7/2011	E-mail correspondence between Ford's Office of the General Counsel and Ford Employees providing legal advice.	Attorney Client Privilege/Attorney Work Product
EA10-001.9 001808-001814	Email with attachment	Amanda Prescott, Ford Employee	Jay Logel, Office of the General Counsel Attorney	Thomas Falahee, Office of the General Counsel Attorney; Wesley Sherwood, Ford Employee; Raymond Nevi, Ford Employee; Patrick Culkeen, Ford Employee; Todd Fronckowiak, Ford Employee; Francis Wickenheiser, Ford Employee; Kenneth Gniewek, Ford Employee	2/18/2011	E-mail correspondence between Ford Employee and Ford's Office of the General Counsel requesting legal advice.	Attorney Client Privilege
EA10-001.9 001815	Email	(1) Jay Logel, Office of the General Counsel Attorney; (2) Amanda Prescott, Ford Employee; (3) Jay Logel, Office of the General Counsel Attorney	(1) Amanda Prescott, Ford Employee; Patrick Culkeen, Ford Employee; (2) Jay Logel, Office of the General Counsel Attorney, Patrick Culkeen, Ford Employee; (3) Amanda Prescott, Ford Employee; Patrick Culkeen, Ford Employee		(1) 2/2/2011; (2) 2/3/2011; (3) 2/3/2011	E-mail correspondence between Ford's Office of the General Counsel and Ford Employees relating to legal advice.	Attorney Client Privilege

EA10-001 Supplement - Privilege Log

Bates Range	Document Type	Document Author(s)	Document Recipient(s)	Document cc's	Document Date	Document Description	Privilege (Basis of Claim)
EA10-001.9 001816-001820	Email with attachment	(1) Amanda Prescott, Ford Employee; (2) Emily Frascaroli, Office of the General Counsel Attorney; (3) Amanda Prescott, Ford Employee; (4) Emily Frascaroli, Office of the General Counsel Attorney; (5) Amanda Prescott, Ford Employee; (6) Thomas Falahee, Office of the General Counsel Attorney; (7) Amanda Prescott, Ford Employee	(1) Jim Chascsa, Ford Employee; Emily Frascaroli, Office of the General Counsel Attorney; (2) Amanda Prescott, Ford Employee; Jim Chascsa, Ford Employee; (3) Emily Frascaroli, Office of the General Counsel Attorney; (4) Amanda Prescott, Ford Employee; Thomas Falahee, Office of the General Counsel Attorney; (5) Emily Frascaroli, Office of the General Counsel Attorney; Thomas Falahee, Office of the General Counsel Attorney; (6) Amanda Prescott, Ford Employee; Emily Frascaroli, Office of the General Counsel Attorney; (7) Thomas Falahee, Office of the General Counsel Attorney; Emily Frascaroli, Office of the General Counsel Attorney	(1) Sharon Welch, Ford Employee; Patrick Culkeen, Ford Employee; (2) Sharon Welch, Ford Employee; Patrick Culkeen, Ford Employee; Thomas Falahee, Office of the General Counsel Attorney	(1) 2/15/2011; (2) 2/15/2011; (3) 2/15/2011; (4) 2/15/2011; (5) 2/15/2011; (6) 2/15/2011; (7) 2/15/2011; 2/16/2011	E-mail correspondence between Ford Employee and Ford's Office of the General Counsel requesting and receiving legal advice.	Attorney Client Privilege