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OFFICE OF DEFECTS &
INVESTIGATIONS
2011 FEB 27 4:44 cab

James P. Vondale, Director
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March 4, 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

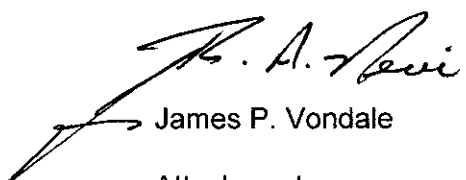
The Ford Motor Company (Ford) response to the agency's February 18, 2011 letter requesting additional information pertaining to the subject Engineering Analysis is attached.

On February 25, 2011, Ford requested an extension of time to respond to the agency's request. In a February 25, 2011 email, the agency directed Ford to provide responses to Questions 1 through 6 for the subject vehicles by March 4, 2011, and responses to the remaining questions by March 11, 2011. Accordingly, Ford is providing responses to Questions 1 through 6 in this letter. Ford plans to provide its response to Questions 7 through 9 by March 11, 2011, as requested.

The search parameters, criteria, and categorizations that were used in response to this request are consistent with those used in Ford's May 14, 2010 submission for EA10-001. Ford searched for reports and claims received between March 23, 2010, the date of the last search, and February 18, 2011, the date of this information request.

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

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 response.

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 understands this request pertains 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 includes 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 request for information, followed by our response. Unless otherwise stated, Ford has undertaken to provide responsive documents dated from March 23, 2010, the cutoff date of our last search in response to EA10-001, through 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, and North American Product Development.

Request 1

State within the body of the response letter a summary table, by make, 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 (in "yyyy/mm/dd" date format);
- f. Date warranty coverage commenced (in "yyyy/mm/dd" date format); and
- g. The State in the United States where the vehicle was originally sold or leased (or delivered for sale or lease).

Provide the detailed information in Microsoft Access 2007, or a compatible format, entitled "Q1_PRODDATA.accdb" Multiple model vehicle data can be provided in separate tables within a single database file providing that the overall file size does not exceed 1GB.

Answer

The production volume data Ford previously provided in its responses to PE09-046 and EA10-001 remains accurate for all of the included vehicles for the 2004 through 2006 model years, as production of all included vehicles was completed by the end of 2006.

Request 2

State the number of each of the following reports, received by Ford, or of which Ford is 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 fire, 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; and
- 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 "f" state within the body of the response letter a summary table containing the total number of each item (e.g., a. consumer complaints, b. field reports, etc.) separately. Multiple incidents involving the same vehicle are to be counted 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 in Appendix A.

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

Category	Allegation
A1	Clockspring jumper wiring chafe/short condition resulting in an inadvertent driver frontal air bag deployment
A2	Clockspring jumper wiring chafe/short condition resulting in an illumination of the air bag warning lamp
B1	Inadvertent driver frontal air bag deployment, cause not identified
B2	Air bag warning light illuminated, ambiguous cause
B3	Air bag warning light illuminated, clockspring replaced, cause not identified

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 A, were reviewed for relevance and sorted 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 B. 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.

Vehicle	Owner Reports			Non-Duplicative Subcategories				
	Category	Total Reports	Non-Duplicative Reports	Fire	Crash	Injury	Fatality	Property Damage
2004-2006 Ford F-150	A1	4	1	0	0	0	0	0
	A2	0	0	0	0	0	0	0
	B1	55	18	0	0	0	0	0
2006 Lincoln Mark LT	A1	0	0	0	0	0	0	0
	A2	0	0	0	0	0	0	0
	B1	1	0	0	0	0	0	0
2002.5-2005 Ford Explorer	A1	0	0	0	0	0	0	0
	A2	0	0	0	0	0	0	0
	B1	3	1	0	0	0	0	0
2002.5-2005 Mercury Mountaineer	A1	0	0	0	0	1	0	0
	A2	0	0	0	0	0	0	0
	B1	0	0	0	0	0	0	0
2002.5-2005 Lincoln Aviator	A1	0	0	0	0	0	0	0
	A2	0	0	0	0	0	0	0
	B1	1	0	0	0	0	0	0

Legal Contacts: Ford is providing, in Appendix A, a description of Legal Contacts and the activity that is responsible for this information. To the extent that responsive (Category A1, A2, or B1) 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 that are related to the responsive owner reports are provided in Appendix C.

Field Reports: Records identified in a search of the Common Quality Indicator System (CQIS) database, as described in Appendix A, were reviewed for relevance and sorted 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 B. 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 B but are not included in the field report count.

Vehicle	Field Reports			Non-Duplicative Subcategories				
	Category	Total Reports	Non-Duplicative Reports	Fire	Crash	Injury	Fatality	Property Damage
2004-2006 Ford F-150	A1	6	2	0	0	1	0	0
	A2	0	0	0	0	0	0	0
	B1	15	8	0	0	0	0	0
2006 Lincoln Mark LT	A1	0	0	0	0	0	0	0
	A2	0	0	0	0	0	0	0
	B1	0	0	0	0	0	0	0
2002.5-2005 Ford Explorer	A1	0	0	0	0	0	0	0
	A2	0	0	0	0	0	0	0
	B1	0	0	0	0	0	0	0
2002.5-2005 Mercury Mountaineer	A1	0	0	0	0	0	0	0
	A2	0	0	0	0	0	0	0
	B1	0	0	0	0	0	0	0
2002.5-2005 Lincoln Aviator	A1	0	0	0	0	0	0	0
	A2	0	0	0	0	0	0	0
	B1	0	0	0	0	0	0	0

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, and lawsuits and claims. A chart identifying potentially relevant allegations is being provided in Appendix D. Copies of reports corresponding to these alleged incidents are provided in the MORIS, CQIS, and Analytical Warranty System (AWS) portions of the database provided in Appendix B.

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 sorted 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.

Vehicle	Lawsuits/Claims/Arbitrations			Non-Duplicative Subcategories				
	Category	Total Reports	Non-Duplicative Reports	Fire	Crash	Injury	Fatality	Property Damage
2004-2006 Ford F-150	A1	5	5	0	0	3	0	4
	A2	0	0	0	0	0	0	0
	B1	30	28	0	1	26	0	5
2006 Lincoln Mark LT	A1	0	0	0	0	0	0	0
	A2	0	0	0	0	0	0	0
	B1	1	1	0	0	1	0	0
2002.5-2005 Ford Explorer	A1	0	0	0	0	0	0	0
	A2	0	0	0	0	0	0	0
	B1	1	1	0	0	1	0	0
2002.5-2005 Mercury Mountaineer	A1	0	0	0	0	0	0	0
	A2	0	0	0	0	0	0	0
	B1	0	0	0	0	0	0	0
2002.5-2005 Lincoln Aviator	A1	0	0	0	0	0	0	0
	A2	0	0	0	0	0	0	0
	B1	1	1	0	0	1	0	1

We are providing the requested detailed information, where available, on the responsive and ambiguous lawsuits and claims in our Log of Lawsuits and Claims, provided in Appendix B in the Legal Claim/Lawsuits tab. 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 E. With regard to these lawsuits and claims, Ford has not undertaken to contact outside law firms to obtain additional documentation.

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., a. consumer complaint, b. field report, f. lawsuits 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 (in "yyyy/mm/dd" date format);
- h. Report or claim date (in "yyyy/mm/dd" date format);
- i. Whether a fire or crash is alleged;
- j. Whether property damage is alleged;
- k. Number of alleged injuries, if any; and
- l. Number of alleged fatalities, if any.

Provide this information in Microsoft Access 2007, or a compatible format, entitled "Q3_ORDATA.accdb." Multiple model vehicle data can be provided in separate tables within a single database file providing that the overall file size does not exceed 1GB.

Answer

Ford is providing owner and field reports in the database contained in Appendix B in response to Request 2. To the extent the information sought in Request 3 is available for owner and field reports, it is provided in the database. To the extent the information sought in Request 3 is available for lawsuits and claims, it is provided in the Log of Lawsuits and Claims provided in Appendix B in the Legal Claim/Lawsuits tab.

Request 4

Produce copies of all documents related to each item within the scope of Request No. 2. Organize the documents separately by category (i.e., a. consumer complaints, b. field reports, f. lawsuits 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 B in response to Request 2. Copies of complaints, first notices, or MORS reports relating to matters shown on the Log of Lawsuits and Claims provided in Appendix B in the Legal Claim/Lawsuits tab are provided in Appendix E. To the extent the information sought in Request 4 is available, it is provided in the referenced appendices.

Request 5

State within the body of the response letter a summary table, by model and model year, a total count for each 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 including 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 (in "yyyy/mm/dd" date format);
- 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; and
- k. Comment, if any, by dealer/technician relating to claim and/or repair; and
- l. Type of claims/issue (Air bag light illumination or inadvertent deployment if not readily identifiable from the repair code or the part replacement fields).

Multiple repairs involving the same vehicle are to be counted separately, but duplicate repair claims are not to be included. Multiple reports of the same incident are also to be counted separately (i.e., a consumer complaint and a warranty claim). If desired, the warranty claim can be tagged as a "duplicate to an owner report" in the summary table and in the data file.

Provide the detailed information in Microsoft Access 2007, or a compatible format, entitled "Q5_WRNTYDATA.accdb." Multiple model vehicle data can be provided in separate tables within a single database file providing that the overall file size does not exceed 1GB.

Answer

Records identified in a search of the AWS database, as described in Appendix A, were reviewed for relevance and sorted 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 B. 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 B 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.

Warranty Claims			
Vehicle	Category	Total Reports	Non-Duplicative Reports
2004-2006 Ford F-150	A1	0	0
	A2	0	0
	B1	6	0
2006 Lincoln Mark LT	A1	0	0
	A2	0	0
	B1	0	0
2002.5-2005 Ford Explorer	A1	0	0
	A2	0	0
	B1	0	0
2002.5-2005 Mercury Mountaineer	A1	0	0
	A2	0	0
	B1	0	0
2002.5-2005 Lincoln Aviator	A1	0	0
	A2	0	0
	B1	0	0

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 A.

Ford previously provided information concerning the terms of the new vehicle warranty coverage, extended warranty options, and the number of vehicles that are covered for the 2004 through 2006 model year Ford F-150 vehicles in its November 19, 2009, response to PE09-046. Additionally Ford previously provided the terms of the new vehicle warranty coverage, extended warranty options, and the number of vehicles that covered for the 2006 model year Lincoln Mark LT, 2002 through 2005 model year Ford Explorer, 2002 through 2005 model year Mercury Mountaineer, and 2003 through 2004 model year Lincoln Aviator vehicles in its May 14, 2010, response to EA10-001.

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