



JUL 22 2010

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July 20, 2010

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

Dear Mr. Boyd:

Subject: PE10-016:NVS-213hkb

The Ford Motor Company (Ford) response to the agency's June 4, 2010, letter concerning reports of alleged rear axle beam fractures in 1999 through 2003 model year Ford Windstars is attached.

The information and data collected in the preparation of this response demonstrate that the subject vehicles have performed well despite their age (some have been in service for more than 12 years) and the cumulative mileage they have travelled (over 120 billion miles). This information also demonstrates that the vehicles should remain controllable even in the event of a complete axle fracture and separation.

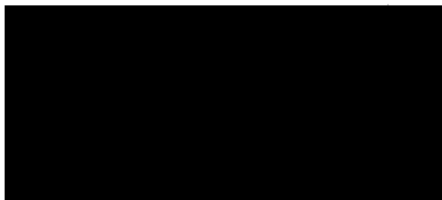
The reported rate of rear cracking axle reports received by Ford of any type – not only complete fractures - on the subject vehicles is low (0.54 R/1000). Further, the rate where reports specifically indicate that the axle fractured completely is notably lower at 0.16 R/1000. While the vast majority (approximately 94%) of reports relating to this subject come from corrosion states, the allegation rate of any type of fracture even when adjusted just for vehicles in corrosion states remains low (0.90 R/1000), and the rate in the corrosion states where reports indicate that the axle fractured completely is again notably lower at 0.27 R/1000, especially considering the age and mileage of the vehicles in service in these severe conditions. At the time this information request was received, Ford was aware of only two alleged minor accidents and three allegations of minor injuries relating to this subject and the only lawsuit against Ford concerning this subject is class action lawsuit for which notice was served on Ford six days after the publication of the PE10-016 resume concerning this subject.



Ford will continue its analysis relating to this subject and will work with the agency to inspect incident vehicles and to evaluate the effect of a fractured rear axle on vehicle handling and control. Ford will also monitor reports related to this investigation and analyze any additional VOQs provided by the agency.

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

Sincerely,

A large black rectangular redaction box covering the signature area.

FORD MOTOR COMPANY (FORD) RESPONSE TO PE10-016

Ford's response to this Preliminary Evaluation 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 Preliminary Evaluation.

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.

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 June 4, 2010, the date of your inquiry. Ford has searched within the following offices for responsive documents: Sustainability, Environment and Safety Engineering, Ford Customer Service Division, Marketing and Sales Operations, Quality, Global Core Engineering, Office of the General Counsel, and North American Product Development.

Request 1

State, by model year and region (Salt Belt and non-Salt Belt states), 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.; and
- g. 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 2003, or a compatible format, entitled "PE10-016 PRODUCTION DATA." See Enclosure, Data Collection Disc, for a pre-formatted table that provides further details regarding this submission.

Answer

Ford records indicate that the approximate total number of subject vehicles sold in the United States, (the 50 states and the District of Columbia) protectorates, and territories (American Samoa, Guam, Northern Mariana Islands, Puerto Rico, and Virgin Islands) is 914,789.

The "Salt Belt" Region includes the following states: Connecticut, Delaware, Iowa, Illinois, Indiana, Massachusetts, Maryland, Maine, Michigan, Minnesota, Missouri, New Hampshire, New Jersey, New York, Ohio, Pennsylvania, Rhode Island, Vermont, Wisconsin, West Virginia, and also includes Washington DC. Vehicles sold in areas not listed above are considered non-Salt Belt states. Selling state information is unknown for a limited number of vehicles; these vehicles are included in the count of Unknown Region.

The number of subject vehicles sold in the United States by model, model year, and region is shown below:

Model / Region	1999 MY	2000 MY	2001 MY	2002 MY	2003 MY
Salt Belt Region	111,136	131,367	106,581	81,443	86,500
non-Salt Belt Region	90,614	100,645	72,497	61,291	57,978
Unknown Region	3,811	1,957	2,121	3,415	3,433
Total Windstar	205,561	233,969	181,199	146,149	147,911

The requested data for each subject vehicle is provided in Appendix A.

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:

- a. Consumer complaints, including those from fleet operators;
- b. Field reports, including dealer field reports;
- c. Reports involving a 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;
- 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 "d," 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).

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 B.

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

Category	Allegation
A1	Rear axle complete fracture and separation
A2	Rear axle cracked but not separated
A3	Rear axle broken but unknown if separated
B	Possible rear axle breakage or crack

Ford notes that some reports allege a fracture of the rear axle but do not contain sufficient detail to determine if the rear axle has only cracked without separation (category A2), or if it has completely fractured and separated (category A1.) These reports are assigned a category of A3. In addition, some reports allege a concern with the rear axle but do not contain sufficient detail to determine if the report relates to the agency's request. These reports are assigned a category of B. 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 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 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. Ford has identified no responsive or ambiguous reports.

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 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 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 234 Vehicle Owner Questionnaires (VOQs), one of which was duplicative. Ford made inquiries of its MORS database for customer contacts, and its CQIS database for field reports regarding the vehicles identified on the VOQs. Ford notes that in some instances where the VOQ does not contain the VIN or the owner's last name and zip code, it is not possible to query the databases for owner and field reports specifically corresponding to the VOQs. There are 89 VOQs related to the alleged defect that are duplicative of MORS reports provided in Appendix C.

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. Potentially relevant allegations are noted in the Alleged Accident and Alleged Injury fields in Appendix C. Reports corresponding to these alleged incidents are provided in the MORS, CQIS, Legal Claim/Lawsuits, and Analytical Warranty System (AWS) portions of the database provided in Appendix C.

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.

We are providing the requested detailed information, where available, on the responsive and ambiguous lawsuits and claims in Appendix C in the Legal Claim/Lawsuits tab. The number of relevant lawsuits and claims identified is also provided in this tab. There are no product liability lawsuits and one class action lawsuit. Ford was served notice of the class action lawsuit six days after the publication of the PE10-016 resume for this information request, demonstrating the class action lawsuit was a direct result of this investigation. Any responsive lawsuits or claims related to the alleged defect that are duplicative of a MORS or CQIS report

provided in Appendix C have been noted in the "Dup" field and are not included in the report count.

To the extent available, copies of complaints, first notices, or MORS reports relating to matters shown in Appendix C in the Legal Claim/Lawsuits tab are provided in Appendix D. 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., 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. Report or claim date;
- i. Whether a 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 2003, or a compatible format, entitled "PE10-016 REQUEST NUMBER TWO DATA." See Enclosure, 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 Appendix C 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., 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 in Appendix C in the Legal Claim/Lawsuits tab are provided in Appendix D. 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 information:

- a. Ford's claim number;
- b. Vehicle owner's or fleet name (and fleet contact person)
- c. Vehicle owner's or fleet address
- d. Vehicle owner's telephone number;
- e. VIN;
- f. Repair date;
- g. Vehicle mileage at time of repair;
- h. Repairing dealer's or facility's name, telephone number, city and state or ZIP code;
- i. Labor operation number;
- j. Problem code;
- k. Replacement part number(s) and description(s);
- l. Concern stated by customer;
- m. The cause and correction of the concern; and
- n. Comment, if any, by dealer/technician relating to claim and/or repair.

Provide this information in Microsoft Access 2003, or a compatible format, entitled "PE10-016 WARRANTY DATA." See Enclosure, 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 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 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.

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 1999-2003 model year Windstar 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. The details of the various plans are provided in Appendix E. As of the date of the information request, 213,1527 new vehicle ESP policies had been purchased on 1999-2003 model year Windstar vehicles.

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 rear axle beam failure, 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 agency's request.

Internal Service Messages: Ford has identified no ISMs that may relate to the agency's request.

Field Review Committee: Ford has identified no field service action communications that may relate to the agency's request.

Ford is not aware of any forthcoming communications related to the alleged defect in the subject vehicles.

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 F.

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.

Ford is submitting additional responsive documentation in Appendix G 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 H. Redacted copies of the confidential documents will be provided under separate cover to the agency's Office of Chief Counsel as Appendix G - Redacted.

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

Describe all modifications or changes made by, or on behalf of, Ford in the design, material composition, manufacture, quality control, supply, or installation of the subject component, from the start of production to date, which relate to, or may relate to, the alleged defect in the subject vehicles. For each such modification or change, provide the following information:

- a. The date or approximate date on which the modification or change was incorporated into vehicle production;
- b. A detailed description of the modification or change;
- c. The reason(s) for the modification or change;
- d. The part numbers (service and engineering) of the original component;
- e. The part number (service and engineering) of the modified component;
- f. Whether the original unmodified component was withdrawn from production and/or sale, and if so, when;
- g. When the modified component was made available as a service component; and
- h. Whether the modified component can be interchanged with earlier production components.

Also, provide the above information for any modification or change that Ford is aware of which may be incorporated into vehicle production within the next 120 days.

For each component/assembly part number, provide the supplier's name, address, and appropriate point of contact (name, title, and telephone number).

Answer

A table of the requested changes is provided in Appendix I.

Ford is not aware of any forthcoming modifications related to the subject components in the subject vehicles.

Request 10

State the number of rear axle beam assemblies/components that Ford has sold that may be used in the subject vehicles by component name, part number (both service and engineering/production), model and model year of the vehicle in which it is used and month/year of the sale (including the cut-off date for sales, if applicable). Also, identify by make, model and model year, any other vehicles of which Ford is aware that contain the identical component, whether installed in production or in service, and state the applicable dates of production or service usage.

Answer

As the agency is aware, Ford service parts are sold in the U.S. to authorized Ford and Lincoln-Mercury dealers. Ford has no means to determine how many of the parts were actually installed on vehicles, the vehicle model or model year on which a particular part was installed, the reason for any given installation, or the purchaser's intended use of the components sold.

Ford is providing the total number of Ford service replacement rear axle beam assemblies by part number (both service and engineering) and year of sale, where available, in Appendix J. Information pertaining to production and service usage for each part number, and supplier point of contact information, is also included in Appendix J.

Request 11

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

- a. The causal or contributory factor(s);
- b. The failure mechanism(s);
- c. The failure mode(s) (i.e rear axle partially cracked and/or complete separation);
- d. The risk to motor vehicle safety that it poses;
- e. The effect on vehicle control while driving at highway speeds (e.g. speeds ≥ 55 mph) and while turning at speeds above and below 55 mph;
- f. What warnings, if any, the operator and the other persons both inside and outside the vehicle would have that the alleged defect was occurring or subject component was malfunctioning; and
- g. The reports included with this inquiry.

Answer

The rate of rear axle fracture reports received by Ford on the subject vehicles is low (0.54 R/1000), especially considering the time in service (up to 12 years) and the estimated 120 billion miles the subject vehicles have travelled in that time. The vast majority (approximately 94%) of reports relating to this subject come from corrosion states, and the allegation rate even when adjusted just for vehicles in corrosion states is low (0.90 R/1000.) In non-corrosion states, the rate is 0.076 R/1000.

Despite the age and mileage of the subject vehicles, the report data indicate these vehicles have performed extremely well. At the time this information request was received, Ford was aware of only two accident allegations and three injury allegations relating to this subject. The information available to Ford in these reports indicates that these accidents and injuries were minor. Neither of these reports claim collisions with other vehicles and neither provided a police report to further support their allegation.

One of the claimants who alleged an accident did not contact Ford, but only filed a VOQ with the agency (10318353). The claimant alleged "*the rear axle snapped in half*" and the vehicle "*hit the guard rail.*" No injuries were noted and no police report was referenced. Because the claimant did not contact Ford or provide a VIN in the VOQ, we have no further details regarding this incident. Ford was unable to review the vehicle and cannot evaluate whether the "snapped" rear axle contributed to the alleged accident, or if it instead was damaged and fractured only after the vehicle hit the guard rail.

The one accident claim that was made to Ford, VIN 2FMDA5140XB [REDACTED] stated the driver "...lost control of steering wheel - when tried to turn wheel it would not turn." The driver then reportedly lost control of the vehicle and hit an unspecified wall. The photos provided to Ford by the claimant contain one of a fractured rear axle, but none showing details of the front suspension or steering components that might explain the reported inability to turn the steering wheel. Ford notes that inability to turn the steering wheel is inconsistent with consequences resulting from a fractured rear axle in a front wheel drive vehicle. No injuries were reported and no police report or insurance claim was filed. The claim to Ford was only for financial assistance with the vehicle repair. Again, because Ford was unable to review the vehicle, we cannot evaluate whether the fractured rear axle contributed to the alleged accident, or if it instead was fractured only after the vehicle hit the wall.

Ford identified four other reports that use the term "accident" or allege some type of roadway departure, though they provide no indication that the vehicle in-fact struck another vehicle or any object.

VIN 2FMDA5143YE [REDACTED] The customer stated the rear axle "*snapped in half*" and "*Veh ended up on the grass and spun several times.*" The police reportedly responded but the customer did not provide a police report number, so Ford is unable to obtain clarifying information regarding the nature of the incident. The photo provided to Ford shows an out of position front wheel and a damaged rear axle, both on the passenger side. The photo does not provide enough information to accurately assess the incident. The driver reported experiencing knee, back, and neck pain, though no medical reports were provided.

VIN 2FMZA5148YE [REDACTED] The customer stated "...*made clunking sounds and wheels were bowed-axle broke-caused accident.*" No photos or other details of the alleged "accident" were provided. No injuries were reported. No police report or insurance claim was filed. The claimant alleged the rear axle caused the "accident" and was seeking financial assistance for the vehicle repair.

VIN 2FMZA51441B [REDACTED] The customer stated "*Rear axle snapped in half - had a serious wreck yesterday - hurt her back.*" No photos or other details of the alleged "wreck" were provided. No police report or medical report was provided. The claimant was seeking financial assistance for the vehicle repair.

VIN 2FMZA53451E [REDACTED] The customer alleged the rear axle "broke" and caused an "accident." No photos or other details of the alleged "accident" were provided. No injuries were reported. No police report or insurance claim was filed. The claimant was seeking financial assistance for the vehicle repair.

Ford received one claim that alleged an injury resulting from a fractured rear axle without an alleged accident or roadway departure. The claimant (VIN 2FMDA52462E [REDACTED]) simply alleged experiencing back and neck pain after "*Rear axle broke and it ruined the tire.*" No other incident details or medical reports were provided. The police reportedly responded but did not file a report and the insurance claim was rejected by claimant's insurance company. The claimant was seeking financial assistance with the vehicle repair.

After Ford's receipt of this information request the agency provided additional VOQ's to Ford, including two that allege some type of loss of control associated with a fractured rear axle. Similar to other reports discussed above, the information immediately available to Ford is

insufficient to evaluate whether these alleged incidents resulted from a fractured axle, or whether the axle instead fractured as a result of the incident. Ford will work with the agency to further evaluate the circumstances surrounding each of these reports.

The preponderance of real world data suggests the vehicle remains controllable even in the event of a complete rear axle fracture. The vast majority (95%) of reports received by Ford alleging a cracked or completely fractured rear axle do not indicate any concern for loss of vehicle control. Additionally, some customers note that there was indication of an unusual symptom, such as changes in vehicle ride or noise while driving, for days or weeks before the axle fractured.

To further evaluate the effect of a fractured rear axle on vehicle control, Ford is in the process of conducting vehicle tests under a variety of conditions. Ford is aware of similar testing being conducted by the agency and welcomes a discussion of the vehicle test results and observations with the agency.

Ford recognizes fracture of the rear axle results in significant customer dissatisfaction as the repair cost can be high, and customers whose vehicles require a rear axle repair are understandably agitated at the prospect of paying hundreds of dollars in replacement expenses. However, years of real world data on vehicles that have been in service for up to 12 years clearly supports a conclusion that a fracture of the rear axle in the subject vehicles is not expected to result in a loss of vehicle control, and the likelihood of a related accident or injury is extremely low. In fact, over three-quarters (80%) of the reports received by Ford are simply requests for financial assistance with the repair.

Ford will continue its analysis relating to this subject and will work with the agency to inspect incident vehicles and to evaluate the effect of a fractured rear axle on vehicle handling and control. Ford will also monitor reports related to this investigation and analyze any additional VOQs provided by the agency.

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