



INFORMATION Redacted PURSUANT TO THE FREEDOM OF
INFORMATION ACT (FOIA), 5 U.S.C. 552(B)(6)

RECEIVED
WASHINGTON, DC 20590

Steve M. Kenner, Global Director
Automotive Safety Office
Sustainability, Environment & Safety Engineering

2011 OCT -3 P 12:47

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330 Town Center Drive
Dearborn, MI 48126-2738 USA

OFFICE OF CHIEF
COUNSEL

September 28, 2011

Mr. Oakley Kevin Vincent
Chief Counsel
Office of the Chief Counsel
National Highway Traffic Safety Administration
1200 New Jersey Avenue SE, Room W41-322
Washington, DC 20590

Dear Mr. Vincent:

Subject: Request Under 49 CFR Part 512 for Confidential Treatment of
Information Regarding EA11-001.01

This letter requests confidential treatment and supports Ford's claim of confidentiality for confidential business information in accordance with 49 CFR § 512.8 and 5 U.S.C. § 552(b)(4). Ford is submitting documents in response to the agency's July 26, 2011 request for information related to their EA11-001.01 peer review into brake line corrosion on 1999 through 2003 model year Ford F-150, F-250, Expedition, Navigator, Blackwood, and Excursion vehicles.

Two copies of confidential information, referenced in the Ford Motor Company (Ford) September 28, 2011 response to the agency's July 26, 2011 inquiry, EA11-001.01, are provided on the enclosed compact discs. Also for your reference, Attachment 1 is a copy of the non-confidential portion of Ford's response to the Office of Defects Investigation's information request.

Ford requests protection from public disclosure for the documents because the documents contain confidential business information within the meaning of 49 C.F.R. § 512.3 and 512.15, and meet the following requirements:

1. The documents contain information that is not customarily released to the public by Ford.
2. Competitive Harm Test (established in *National Parks & Conservation Ass'n v. Morton*, 498 F.2d 765 (D.C. Cir. 1974), and its progeny, and set forth in 49 CFR § 512.15(b)): The documents contain confidential business information, the public disclosure of which would likely cause substantial competitive harm to Ford as further explained below.



Ford's request for confidential treatment includes documents from the following categories: Engineering Design Specifications, Test Procedures, and Test Specifications. A description of Ford's rationale is contained in the following two paragraphs and is supplemented in the table provided in Attachment 2.

Release of these documents (specifications, test procedures, and test specifications) would allow competitors to refine and improve their vehicles, components, and processes without the need to invest similarly substantial resources and time as Ford has done. Not only do these documents provide Ford's proprietary processes for designing, testing and assessing vehicles and components, they also provide Ford's criteria for acceptance of vehicle and/or component designs. These documents may be used to copy Ford designs.

Ford documents of the types stated are maintained under a record keeping system which is intended to control dissemination of this material within Ford, and to assure that the material is not disseminated outside of Ford, except as described in the attached certification (Attachment 3), which is made pursuant to 49 CFR § 512.4(b).

A compact disc containing copies of the documents is labeled "CONFIDENTIAL" and documents contained in the electronic files are marked "ENTIRE PAGE CONFIDENTIAL BUSINESS INFORMATION", in the margin, as part of this response.

Ford requests that these documents be granted confidential treatment by the agency for a period of ten years. Earlier disclosure of these documents, in Ford's opinion, would result in substantial competitive harm.

In the event that the agency should conclude that all or part of the submitted information is not to be given confidential treatment, Ford asks the agency to provide reasonable notice of not less than ten working days prior to any contemplated disclosure in order that Ford may pursue such legal remedies as it may choose. Please direct all written notices to me at Ford Motor Company, Suite 400, Fairlane Plaza South, 330 Town Center Drive, Dearborn, Michigan 48126. Please direct all non-written communication to Mr. Alan Prescott, Esq. in Ford's Office of the General Counsel, who may be contacted by telephone at (313) 390-5621.

Thank you for your continuing courtesy.
Sincerely,



Steven M. Kenner

Attachments (3)
Enclosure



Steve M. Kenner, Global Director
Automotive Safety Office
Sustainability, Environment & Safety Engineering

Fairlane Plaza South, Suite 400
330 Town Center Drive
Dearborn, MI 48126-2738 USA

September 28, 2011

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

Dear Mr. Borris:

Subject: EA11-001.01:NVS-213cla

The Ford Motor Company (Ford) response to the agency's July 26, 2011 letter requesting certain information concerning 1999 through 2003 Ford F-150, F-250, Expedition, Navigator, Blackwood, and Excursion vehicles is attached. Ford understands that there is no alleged defect with respect to any of its vehicles and is providing this information as part of the agency's investigation of another manufacturer's vehicles.

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

Sincerely,

A handwritten signature in black ink that reads "S. M. Kenner".

Steven M. Kenner

Attachment



FORD MOTOR COMPANY (FORD) RESPONSE TO EA11-001.01

Ford's response to this Engineering Analysis peer vehicle information request was prepared pursuant to a diligent search for the information requested. We have made every effort to provide thorough and accurate information, and we would be pleased to meet with agency personnel to discuss any aspect of this peer vehicle information request.

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, as more fully described in this response. 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 an August 11, 2011 telephone conversation, Messrs. Jeff Quant and Chris Lash of the agency requested the response data be provided in two separate vehicle groups: one Light Duty group consisting of F-150, F-250 Light Duty, Expedition, Navigator, and Blackwood vehicles and one Heavy Duty group consisting of F-250 Super Duty and Excursion 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 the agency's 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 July 26, 2011, 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 and model year, the number of subject vehicles Ford has manufactured for sale or lease in the United States. Separately, for each peer 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. Brake System Type (ABS, Traction Control, Both);
- g. Date warranty coverage commenced; and
- h. The State in the United States where the vehicle was originally sold or leased (or delivered for sale or lease).

Provide the table in Microsoft Access 2000, or a compatible format, entitled "PRODUCTION DATA." See Enclosure I, Data Collection Disc, for a pre-formatted table which provides further details regarding this submission.

Answer

Ford records indicate that the approximate total number of subject peer vehicles sold in the United States (the 50 states and the District of Columbia) and its protectorates and territories (American Samoa, Guam, Northern Mariana Islands, Puerto Rico, and Virgin Islands) is 3,731,131 light duty vehicles and 1,177,729 heavy duty vehicles for a total of 4,908,860 vehicles.

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

MODEL	1999 MY	2000 MY	2001 MY	2002 MY	2003 MY	Grand Total
BLACKWOOD	0	0	0	3,379	1	3,380
EXPEDITION	240,683	237,913	175,032	95,156	244,543	993,327
F-150	492,154	456,085	589,266	500,691	492,802	2,530,998
F-250 LD	23,450	0	0	0	0	23,450
NAVIGATOR	41,367	41,516	32,112	17,874	47,107	179,976
Light Duty Total	797,654	735,514	796,410	617,100	784,453	3,731,131

MODEL	1999 MY	2000 MY	2001 MY	2002 MY	2003 MY	Grand Total
EXCURSION	0	65,406	34,733	26,904	26,564	153,607
F-250 SD	249,224	200,331	197,115	177,700	199,752	1,024,122
Heavy Duty Total	249,224	265,737	231,848	204,604	226,316	1,177,729

The requested data for each subject peer vehicle is provided in Appendix A1 for the Light Duty group and Appendix A2 for the Heavy Duty group.

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 condition in the peer 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 peer vehicle, property damage claims, consumer complaints, or field reports;

- d. Reports involving a fire, based on claims against the manufacturer involving a death or injury, notices received by the manufacturer alleging or proving that a death or injury was caused by a possible defect in a peer vehicle, property damage claims, consumer complaints, or field reports;
- e. Property damage claims; and
- f. Third-party arbitration proceedings where Ford is or was a party to the arbitration; and
- g. Lawsuits, both pending and closed, in which Ford is or was a defendant or codefendant.

For subparts "a" through "e," 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 "g," 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 "f" and "g," 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 condition in the subject peer vehicles 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	Brake line leak due to corrosion
A2	Brake line leak due to abrasion
A3	Brake line leak with unknown cause

Owner Reports: Records identified in a search of the Master Owner Relations Systems (MORS) database, as described in Appendix B, were reviewed for relevance and categorized in accordance with the categories described above. The number and copies of relevant owner reports identified in this search that may relate to the agency's peer investigation are provided in the MORS III portion of the database contained in Appendix C1 for the Light Duty group and Appendix C2 for the Heavy Duty group. The categorization of each report is identified in the "Category" field.

Legal Contacts: Ford is providing in Appendix B a description of Legal Contacts and the activity that is responsible for this information. To the extent that responsive 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 D.

Field Reports: Records identified in a search of the Common Quality Indicator System (CQIS) database, as described in Appendix B, were reviewed for relevance and categorized in accordance with the categories described above. The number and copies of relevant field reports identified in this search that may relate to the agency's peer investigation are provided in the CQIS portion of the database contained in Appendix C1 for the Light Duty group and Appendix C2 for the Heavy Duty group. 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.

VOQ Data: This information request had an attachment that included 83 Vehicle Owner's Questionnaires (VOQs), 31 were found to be non-responsive (28 were outside the subject peer vehicle population and three did not contain the alleged condition). Ford made inquiries of its MORS database for customer contacts, and its CQIS database for field reports regarding the vehicles reflected 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. Any reports located on a vehicle identified in the VOQs related to alleged condition in the subject peer vehicles are included in the MORS III and CQIS portions of the database provided in Appendix C1 for the Light Duty group and Appendix C2 for the Heavy Duty group and have been identified by a "Y" in the "VOQ Dup" field.

Crash/Injury Incident Claims: For purposes of identifying allegations of accidents or injuries that may have resulted from the alleged condition in the subject peer vehicles, Ford has reviewed responsive owner and field reports, and lawsuits and claims and has identified one potentially responsive report. The claim (VIN 5LMEU27A41L [REDACTED]) alleged an accident due to a leaking brake line. No associated injury was reported. A chart identifying the potentially responsive allegation is being provided electronically as Appendix E.

Ford identified one report (VIN 1FMPU18L5XL [REDACTED]) of an underhood fire in an 11 year old vehicle with over 110,000 miles on it, allegedly due to a corroded brake line leaking on the exhaust manifold. No associated accident or injury was reported. Ford does not have sufficient information pertaining to this incident to confirm the brake line condition or determine the cause of the reported fire.

Claims, Lawsuits, and Arbitrations: For purposes of identifying incidents that may relate to the alleged condition in the subject peer vehicles, Ford has gathered claim and lawsuit information maintained by Ford's OGC. Ford's OGC is responsible for handling product liability lawsuits, claims, and consumer breach of warranty lawsuits and arbitrations against the Company.

Lawsuits and claims gathered in this manner were reviewed for relevance and categorized in accordance with the categories described above.

We are providing the requested detailed information, where available, on the responsive lawsuits and claims in our Log of Lawsuits and Claims, as Appendix F. The number of relevant

lawsuits and claims identified is also provided in this log. To the extent available, electronic copies of complaints, first notices, or MORS reports relating to matters shown on the log are provided in Appendix G. 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 a fire is alleged;
- k. Whether property damage is alleged;
- l. Number of alleged injuries, if any; and
- m. Number of alleged fatalities, if any.

Provide this information in Microsoft Access 2000, or a compatible format, entitled "REQUEST NUMBER TWO DATA," See Enclosure 1, Data Collection Disc, for a preformatted table which provides further details regarding this submission.

Answer

Ford is providing owner and field reports in the database contained in Appendix C1 for the Light Duty group and Appendix C2 for the Heavy Duty group in response to Request 2. To the extent information sought in Request 3 is available for owner and field reports, it is provided in Appendix C1 for the Light Duty group and Appendix C2 for the Heavy Duty group. To the extent information sought in Request 3 is available for lawsuits and claims, it is provided in the Log of Lawsuits and Claims in Appendix F.

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 C1 for the Light Duty group and Appendix C2 for the Heavy Duty group in response to Request 2. Copies of complaints, first notices, or MORS reports relating to matters shown on the Log of Lawsuits and Claims (Appendix F) are provided in Appendix G. To the extent information sought in Request 4 is available, it is provided in the referenced appendices.

Request 5

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 fluid leaks from metallic brake lines in which brake line corrosion was identified as a factor in the peer 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 peer vehicle, property damage claims, consumer complaints, or field reports;
- d. Reports involving a fire, based on claims against the manufacturer involving a death or injury, notices received by the manufacturer alleging or proving that a death or injury was caused by a possible defect in a peer vehicle, property damage claims, consumer complaints, or field reports;
- e. Property damage claims; and
- f. Third-party arbitration proceedings where Ford is or was a party to the arbitration; and
- g. Lawsuits, both pending and closed, in which Ford is or was a defendant or codefendant.

For subparts "a" through "e," 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 "g," 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 "f" and "g," 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

Reports provided in the CQIS and MORS III sections of Appendix C1 for the Light Duty group and Appendix C2 for the Heavy Duty group marked with a category of "A1" are responsive to Request 5.

Request 6

Separately, for each item (complaint, report, claim, notice, or matter) within the scope of your response to Request No. 5, state the following information:

- a. Ford's file number or other identifier used;
- b. The category of the item, as identified in Request No. 5 (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 a fire is alleged;
- k. Whether property damage is alleged;
- l. Number of alleged injuries, if any; and
- m. Number of alleged fatalities, if any.

Provide this information in Microsoft Access 2000, or a compatible format, entitled "REQUEST NUMBER FIVE DATA," See Enclosure 1, Data Collection Disc, for a preformatted table which provides further details regarding this submission.

Answer

The information contained in the reports provided in the CQIS and MORS III sections of Appendix C1 for the Light Duty group and Appendix C2 for the Heavy Duty group and marked with a category of "A1" would be responsive to Request 6.

Request 7

Produce copies of all documents related to each item within the scope of Request No. 5. Organize the documents separately by category (i.e., consumer complaints, field reports, etc.) and describe the method used for organizing the documents.

Answer

To the extent the information sought in Request 7 is available for owner and field reports, it is provided in the CQIS and MORS III sections of Appendix C1 for the Light Duty group and Appendix C2 for the Heavy Duty group in reports marked with a category of "A1."

Request 8

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 condition in the peer vehicles: warranty claims; extended warranty claims; claims for good will services that were provided; field, zone, or similar adjustments and reimbursements;

Separately, for each such claim, state the following reformation:

- a. Ford's claim number;
- b. Vehicle owner or fleet name (and fleet contact person) and telephone number;
- c. VIN;
- d. Repair date;
- e. Vehicle mileage at time of repair;
- f. Repairing dealer's or facility's name, telephone number, city and state or ZIP code;
- g. Labor operation number;
- 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.

Provide this information in Microsoft Access 2000, or a compatible format, entitled "WARRANTY DATA." See Enclosure 1, Data Collection Disc, for a pre-formatted table which provides further details regarding this submission.

Answer

Records identified in a search of the AWS database, as described in Appendix B, were reviewed for relevance and categorized in accordance with the categories described in the response to Request 2. The number and copies of relevant warranty claims identified in this search that may relate to the agency's peer investigation are provided in the AWS portion of the database contained in Appendix C1 for the Light Duty group and Appendix C2 for the Heavy Duty group. 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 C1 for the Light Duty group and Appendix C2 for the Heavy Duty group but are not included in the report count above.

Requests for "goodwill, field or zone adjustments" received by Ford to date that relate to alleged condition in the subject peer vehicles 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 9

Describe in detail the search criteria used by Ford to identify the claims identified in response to Request 8, 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 condition in the peer vehicles. State, by make and model year, the terms of the new vehicle warranty coverage offered by Ford on the peer 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 peer 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 8 are described in Appendix B.

For the subject peer 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) were available to cover various vehicle systems, time in service and mileage increments. As of the date of the information request, 862,231 new

vehicle ESP policies had been purchased on the subject peer vehicles. The details of the various plans for the various subject peer vehicles are provided in Appendix H.

A list of concern codes is provided in Appendix B to assist the agency in identifying under which type of concern each claim was identified.

Request 10

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, fluid leaks from metallic brake lines in which brake line corrosion was identified as a factor in the peer vehicles: warranty claims; extended warranty claims; claims for good will services that were provided; field, zone, or similar adjustments and reimbursements;

Separately, for each such claim, state the following reformation:

- a. Ford's claim number;
- b. Vehicle owner or fleet name (and fleet contact person) and telephone number;
- c. VIN;
- d. Repair date;
- e. Vehicle mileage at time of repair,
- f. Repairing dealer's or facility's name, telephone number, city and state or ZIP code;
- g. Labor operation number;
- 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.

Provide this information in Microsoft Access 2000, or a compatible format, entitled "WARRANTY DATA." See Enclosure 1, Data Collection Disc, for a pre-formatted table which provides further details regarding this submission.

Answer

Reports provided in the AWS section of Appendix C1 for the Light Duty group and Appendix C2 for the Heavy Duty group marked with a category of "A1" would be responsive to Request 10.

Request 11

Describe in detail the search criteria used by Ford to identify the claims identified in response to Request 10, 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 condition in the peer vehicles. State, by make and model year, the terms of the new vehicle warranty coverage offered by Ford on the peer 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 peer 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 category "A1" claims provided in response to Request 10 are described in Appendix B.

For the subject peer 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) were available to cover various vehicle systems, time in service, and mileage increments. As of the date of the information request, 862,231 new vehicle ESP policies had been purchased on the subject peer vehicles. The details of the various plans for the various subject peer vehicles are provided in Appendix H.

A list of concern codes is provided in Appendix B to assist the agency in identifying under which type of concern each claim was identified.

Request 12

Separately, for each model and model year subject peer vehicles, list and describe the composition of the brake lines installed on the subject peer vehicles. The description shall include the materials composition of the brake line beneath the exterior coating(s) on the brake line, including the make(s) or type(s) of coating treatment(s) / paint layer(s), *i.e.* Galvan, Nygal, applied to the brake lines. Identify (name and address) of the suppliers of the brake lines.

Answer

See answer to Request 13.

Request 13

If the make(s) or type(s) of coating treatment(s) / paint layer(s) applied to the brake lines described in the previous question changed during the manufacture of the subject peer vehicle(s), separately, for each model and model year subject peer vehicles, provide a list of changes and a description of the reason(s) why a change was made.

Answer

A matrix describing the original design and any changes to brake line material, coating, or supplier for each of the subject peer vehicles is provided in Appendix I1 for the Light Duty group and Appendix I2 for the Heavy Duty group. Ford is providing the material and coating specification details in Appendix J with a request for confidentiality under separate cover to NHTSA's Office of Chief Counsel pursuant to 49 CFR, part 572.

Request 14

State whether the supplier(s) of the subject components in the subject peer vehicles provided any quality control test reports, lab reports, or reports of a similar nature, analyzing the composition, *e.g.* "in-melt" analysis of the coating of the subject components, to Ford. If so, provide a copy of any report(s).

Answer

Routine supplier quality control reports are typically not provided to Ford. However, as part of this response Ford searched organizations most likely to possess any of the supplier documents requested above and did not locate any responsive documents.

Request 15

Provide a copy of Ford's internal standard(s) or specification(s) on line composition and brake line external coating composition, including thickness.

Answer

Documents describing the brake line composition and the external coating are provided in response to Request 13.

Request 16

State Ford's specifications, i.e Vehicle Technical Specifications or VTS, regarding the corrosion resistance of the subject components and its designed life expectancy. Describe the environment for which the specifications are designed. Provide a copy of any specification(s).

Answer

Ford is providing documents describing the corrosion resistance specifications, design life expectancy, and usage environment of the subject components in Appendix K with a request for confidentiality under separate cover to NHTSA's Office of Chief Counsel pursuant to 49 CFR, part 572.

Request 17

Provide the specification contained in the contract, purchase document, or other similar document(s) with the brake line supplier(s) related to:

- a. The thickness of the brake line(s);
- b. The composition of the brake lines;
- c. The composition of the brake line coating(s); and
- d. The specifications related to the corrosion resistance of the brake line(s).

Answer

The wall thickness of the subject component is 0.71mm. Documents describing the brake line composition and the external coating are provided in response to Request 13. Documents describing the specifications related to brake line corrosion resistance are provided in response to Request 16.

Request 18

Provide a drawing / diagram of the brake line system in the subject peer vehicles that identifies the general layout of the major brake components in relation to the subject peer vehicle.

Answer

Diagrams identifying the general layout of the major brake components in the subject peer vehicles are provided in Appendix L1 for the Light Duty group and Appendix L2 for the Heavy Duty group.

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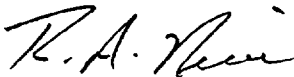
Request for Confidential Treatment of Documents

Document Type	Document Description	Reason for Confidential Treatment
Engineering Design Specifications	Internal Ford Motor Company document containing necessary information to be used by Ford and its suppliers to produce or evaluate parts which are usually issued in conjunction with engineering drawings during the design and development of its vehicles.	Information concerning Ford's engineering design processes could be used by competitors to develop or improve their own products and processes without the need to invest the substantial resources invested by Ford.
Test Procedures and Test Specifications	Internal test procedures developed by Ford Motor Company to be used by Ford and its suppliers to during the design and development of its vehicles.	Information concerning or revealing Ford's testing programs, including test requests, specifications and results could be used by competitors to improve their own products and processes without the need to invest the substantial resources invested by Ford.

**CERTIFICATE IN SUPPORT OF REQUEST
FOR CONFIDENTIALITY**

I, R. A. Nevi, pursuant to the provisions of 49 CFR Part 512, state as follows:

1. I am Assistant Director, Global Automotive Safety Compliance, Automotive Safety Office, and I am authorized by Ford Motor Company (Ford) to execute this certificate on its behalf;
2. The information contained in the attachment to Ford's letter to NHTSA's Office of the Chief Counsel dated September 28, 2011, contains confidential and proprietary data and is submitted with the claim that it is entitled to confidential treatment under 5 U.S.C., § 552(b)(4);
3. A member of my staff has inquired of the responsible Ford personnel who have authority in the normal course of business to release the type of information for which a claim of confidentiality has been made to ascertain whether such information has ever been released outside Ford;
4. Based upon such inquiries, to the best of my knowledge, information and belief, the information for which Ford has claimed confidential treatment has never been released or become available outside Ford except as hereinafter specified:
 - Portions of these documents may have been or may be shared with Ford suppliers with the expectation that they will be kept confidential.
 - During the course of defending itself in litigation, Ford may have been, or may be required to produce such information.
5. I make no representations beyond those contained in this certificate and, in particular, I make no representations as to whether this information may become available outside Ford because of unauthorized or inadvertent disclosure, except as stated in Paragraph 4; and
6. I certify under penalty of perjury that the foregoing is true and correct. Executed on this the 28th day of September, 2011.



R. A. Nevi