

## Howell, Rosa (NHTSA)

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**From:** Nevi, Raymond (R.A.) [rnevi@ford.com]  
**Sent:** Monday, August 08, 2011 5:19 PM  
**To:** Borris, Frank (NHTSA)  
**Cc:** Hershman, Larry (NHTSA); Yon, Scott (NHTSA)  
**Subject:** Ford's Reponses to Requests 6 though 11 for EA11-006:NVS 212lh 1997-2004 F-150 Fuel Tank Straps

Frank,

As the agency is aware, on July 22, 2011, Ford Motor Company (Ford) decided to conduct voluntary safety recall 11S21 (NHTSA Campaign ID 11V385000) relating to this subject. Ford's Part 573 notification of the action was provided to the agency on July 29, 2011.

Prior to Ford's decision to conduct that safety recall, the agency had sent an Engineering Analysis Information Request to Ford. On July 25, 2011, Ford provided responses to Requests 1 through 5 of the agency's July 1, 2011 Engineering Analysis Information Request. As noted in that response, the due date for responses to Requests 6 through 11 was extended to August 8, 2011. The Ford responses to Requests 6 through 11 are provided below.

### Request 6

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

Copies of communications to dealers concerning Ford's voluntary safety recall were provided to the NHTSA Recall Management Division on August 1, 2011, in compliance with applicable portions of 49 CFR Part 577 - Defect and Non-Compliance Information Reporting. In addition, mailing of owner notification letters is expected to begin the week of September 12, 2011; Ford will provide a draft copy of the owner notification letter to the NHTSA for approval prior to September 12, 2011, in compliance with applicable portions of 49 CFR Part 577.

### Request 7

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
- g. from the action.

Answer

In an August 2, 2011, telephone conversation, Mr. Lawrence Hershman of the agency clarified for Ford personnel that the information provided in section 573.6 (c) (6) of Ford's July 29, 2011 defect notification to the agency provided a sufficient response to this request.

Request 8

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(s)/assembly or components, including changes between original equipment and service parts, that may affect the subject components, 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;
- i. The supplier of each modified component;
- j. The models and model years of vehicles affected by the modification.

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.

Answer

There have been no modifications to the subject components as of the date of this information request (July 1, 2011).

Request 9

Produce or provide one of each of the following:

- a. Any kits and service parts that have been released, or developed, by Ford for use in service repairs to the subject or related components/assemblies which relate, or may relate, to the alleged defect in the subject vehicles;
- b. Engineering drawings of all fuel tank support straps and their components and hardware used on the subject vehicles.

Answer

In an August 2, 2011, telephone conversation, Mr. Lawrence Hershman of the agency clarified for Ford personnel that in view of Ford's safety recall the agency does not need the requested parts or drawings.

Request 10

State the number of each of the following 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 sale (including the cut-off date for sales, if applicable):

- a. Subject component(s)/assemblies (specify whether this is for single straps or pairs of straps); and
- b. Any kits that have been released, or developed, by Ford for use in service repairs to the subject component/assembly.

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

In an August 2, 2011, telephone conversation, Mr. Lawrence Hershman of the agency clarified for Ford personnel that in view of Ford's safety recall the agency does not need the requested information.

Request 11

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

- a. The causal or contributory factor(s);
- b. The failure mechanism(s);
- c. The failure mode(s);
- d. The risk to motor vehicle safety that it poses;

- e. What warnings, if any, the operator and other persons both inside and outside the vehicle would have that the alleged defect was occurring or subject component was malfunctioning; and
- f. The reports included with this inquiry.

Answer

Ford refers the agency to its July 29, 2011 Part 573 notification to the agency relating to this subject.

Please contact me if you have any additional questions.



R. A. Nevi  
Assistant Director  
Global Automotive Safety Compliance  
Automotive Safety Office