



U.S. Department
of Transportation
**National Highway
Traffic Safety
Administration**

JUL 26 2011

1200 New Jersey Avenue SE.
Washington, DC 20590

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. James Vondale, Director
Automotive Safety Office
Environmental and Safety Compliance
Ford Motor Company
330 Town Center Drive, Suite 400
Dearborn, MI 48126

NVS-213cla
EA11-001.01

Dear Mr. Vondale:

On January 5, 2011, the National Highway Traffic Safety Administration (“NHTSA” or “agency”) opened Engineering Analysis 11-001 to investigate allegations of brake line corrosion that allegedly can result in rupture during brake application in certain model year (“MY”) 1999 through 2003 C/K series trucks manufactured by General Motors Corporation (“GM”). As part of that investigation, we are requesting “peer vehicle” information from Ford Motor Company (“Ford”).

Significant corrosion can weaken brake lines to a point that a sudden brake line failure can occur when the vehicle’s brake pedal is depressed. A loss of braking ability can result in a crash.

NHTSA is sending you this letter because it is seeking information regarding the prevalence of brake line corrosion that has resulted in fluid leaks of the brake lines in vehicles similar to GM’s C/K trucks. For MY 1999-2003, Ford Motor Corporation (“Ford”) manufactured the Ford F-series platform truck, a pickup truck that is similar to GM’s C/K pickup trucks. ODI is requesting that you collect data on similar brake line corrosion related failure(s) that Ford may have received for light trucks sold in the United States.

Ford is not the subject of this investigation. However, by way of reference, this office has received reports of brake line failure due to corrosion on certain Ford light duty trucks and sport utility vehicles. A copy of each of the reports is attached - see Enclosure 1, “Data Collection Disk and VOQ Files”, file “EA11-001.01PEER VOQs”.

Unless otherwise stated in the text, the following definitions apply to these information requests:

- **Subject peer vehicles:** all MY 1999 through 2003 Ford F-Series platform pickup trucks, Expedition, Excursion and any other vehicles manufactured on a F-Series platform for sale or lease in the United States.
- **Subject component:** Metallic brake lines.



- **Alleged condition:** Fluid leaks from metallic brake lines.
- **Ford:** Ford Motor Corporation, all of its past and present officers and employees, whether assigned to its principal offices or any of its field or other locations, including all of its divisions, subsidiaries (whether or not incorporated) and affiliated enterprises and all of their headquarters, regional, zone and other offices and their employees, and all agents, contractors, consultants, attorneys and law firms and other persons engaged directly or indirectly (e.g., employee of a consultant) by or under the control of Ford (including all business units and persons previously referred to), who are or, in or after January 1, 1994, were involved in any way with any of the following related to the alleged condition in the peer vehicles:
 - a. Design, engineering, analysis, modification or production (e.g. quality control);
 - b. Testing, assessment or evaluation;
 - c. Consideration, or recognition of potential or actual defects, reporting, record-keeping and information management, (e.g., complaints, field reports, warranty information, part sales), analysis, claims, or lawsuits; or
 - d. Communication to, from or intended for zone representatives, fleets, dealers, or other field locations, including but not limited to people who have the capacity to obtain information from dealers.
- **Document:** "Document(s)" is used in the broadest sense of the word and shall mean all original written, printed, typed, recorded, or graphic matter whatsoever, however produced or reproduced, of every kind, nature, and description, and all non-identical copies of both sides thereof, including, but not limited to, papers, letters, memoranda, correspondence, communications, electronic mail (e-mail) messages (existing in hard copy and/or in electronic storage), faxes, mailgrams, telegrams, cables, telex messages, notes, annotations, working papers, drafts, minutes, records, audio and video recordings, data, databases, other information bases, summaries, charts, tables, graphics, other visual displays, photographs, statements, interviews, opinions, reports, newspaper articles, studies, analyses, evaluations, interpretations, contracts, agreements, jottings, agendas, bulletins, notices, announcements, instructions, blueprints, drawings, as-builts, changes, manuals, publications, work schedules, journals, statistical data, desk, portable and computer calendars, appointment books, diaries, travel reports, lists, tabulations, computer printouts, data processing program libraries, data processing inputs and outputs, microfilms, microfiches, statements for services, resolutions, financial statements, governmental records, business records, personnel records, work orders, pleadings, discovery in any form, affidavits, motions, responses to discovery, all transcripts, administrative filings and all mechanical, magnetic, photographic and electronic records or recordings of any kind, including any storage media associated with computers, including, but not limited to, information on hard drives, floppy disks, backup tapes, and zip drives, electronic communications, including but not limited to, the Internet and shall include any drafts or revisions pertaining to any of the foregoing, all other things similar to any of the foregoing, however denominated by Ford, any other data compilations from which information can be obtained, translated if necessary, into a usable form and any other documents. For purposes of this request, any document which contains any note,

comment, addition, deletion, insertion, annotation, or otherwise comprises a non-identical copy of another document shall be treated as a separate document subject to production. In all cases where original and any non-identical copies are not available, "document(s)" also means any identical copies of the original and all non-identical copies thereof. Any document, record, graph, chart, film or photograph originally produced in color must be provided in color. Furnish all documents whether verified by Ford or not. If a document is not in the English language, provide both the original document and an English translation of the document.

- **Other Terms:** To the extent that they are used in these information requests, the terms "claim," "consumer complaint," "dealer field report," "field report," "fire," "fleet," "good will," "make," "model," "model year," "notice," "property damage," "property damage claim," "rollover," "type," "warranty," "warranty adjustment," and "warranty claim," whether used in singular or in plural form, have the same meaning as found in 49 CFR 579.4.

Please provide numbered responses to the following information requests. Please repeat the applicable request verbatim above each response. After Ford's response to each request, identify the source of the information and indicate the last date the information was gathered.

1. State, by model and model year, the number of peer vehicles Ford has manufactured for sale or lease in the United States. Separately, for each peer 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 2003, or a compatible format, entitled "PRODUCTION DATA." See Enclosure 1, Data Collection Disc, for a pre-formatted table that provides further details regarding this submission.

2. State the number of each of the following, received by Ford, or of which Ford is 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.

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 2003, or a compatible format, entitled "REQUEST NUMBER TWO DATA." See Enclosure 1, Data Collection Disc, for a pre-formatted table that provides further details regarding this submission.

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.

5. State the number of each of the following, received by Ford, or of which Ford is 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.

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 2003, or a compatible format, entitled "REQUEST NUMBER FIVE DATA." See Enclosure 1, Data Collection Disc, for a pre-formatted table that provides further details regarding this submission.

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 Ford used for organizing the documents.
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 information:

- 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 2003, or a compatible format, entitled "WARRANTY DATA." See Enclosure 1, Data Collection Disc, for a pre-formatted table that provides further details regarding this submission.

9. Describe in detail the search criteria used by Ford to identify the claims identified in response to Request No. 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.
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 information:

- 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 2003, or a compatible format, entitled "WARRANTY CORROSION DATA." See Enclosure 1, Data Collection Disc, for a pre-formatted table that provides further details regarding this submission.

11. Describe in detail the search criteria used by Ford to identify the claims identified in response to Request No. 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.
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.* Galfan, Nygal, applied to the brake lines. Identify (name and address) of the suppliers of the brake lines.
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.
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).

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

If Ford cannot respond to any specific request or subpart(s) thereof, please state the reason why it is unable to do so. If on the basis of attorney client, attorney work product, or other privilege, Ford does not submit one or more requested documents or items of information in response to this information request, Ford must provide a privilege log identifying each document or item withheld, and stating the date, subject or title, the name and position of the person(s) from, and the person(s) to whom it was sent, and the name and position of any other recipient (to include all carbon copies or blind carbon copies), the nature of that information or material, and the basis for the claim of privilege and why that privilege applies.

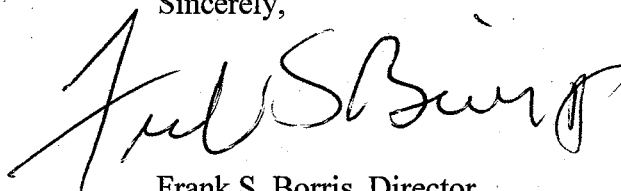
Ford's response to this letter, in duplicate, together with a copy of any confidentiality request, must be submitted to this office by September 28, 2011. Please refer to EA11-001-01 in Ford's response to this letter. If Ford finds that it is unable to provide all of the information requested within the time allotted, Ford must request an extension from me at (202) 366-8089 no later than five business days before the response due date. If Ford is unable to provide all of the information requested by the original deadline, it must submit a partial response by the original deadline with whatever information Ford then has available, even if an extension has been granted.

If Ford claims that any of the information or documents provided in response to this information request constitute confidential commercial material within the meaning of 5 U.S.C. § 552(b)(4), or are protected from disclosure pursuant to 18 U.S.C. § 1905, Ford must submit supporting information together with the materials that are the subject of the confidentiality request, in accordance with 49 CFR Part 512, to the Office of Chief Counsel (NCC-111), National Highway Traffic Safety Administration, Room W41-326, 1200 New Jersey Avenue, S.E., Washington, D.C. 20590. **Ford is required to submit two copies of the documents containing allegedly confidential information (except only one copy of blueprints) and one copy of the documents from which information claimed to be confidential has been deleted.** Please

remember that the word "CONFIDENTIAL BUSINESS INFORMATION" must appear at the top of each page of a submission in an electronic format containing information claimed to be confidential, and the information must be clearly identified in accordance with 49 C.F.R. § 512.6.

If you have any technical questions concerning this matter, please call Chris Lash of my staff, at (202) 366-2370.

Sincerely,

A handwritten signature in black ink, appearing to read "Frank S. Borris". The signature is written in a cursive style with a large, sweeping initial "F".

Frank S. Borris, Director
Office of Defects Investigation
Enforcement

Enclosure 1: One CD ROM titled Data Collection Disc and VOQs containing four files