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

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April 30, 2012

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

Dear Mr. Borris:

Subject: PE12-005:NVS-213swm

The Ford Motor Company (Ford) response to the agency's March 12, 2012 letter concerning reports of alleged speed control cable detachment resulting in throttle interference in 2005 through 2006 Ford Taurus and Mercury Sable vehicles is attached.

Despite the potential for the speed control cable to detach at the throttle body on some vehicles, customer reports and Ford's vehicle evaluations demonstrate that it is unlikely to interfere with the throttle operation and if it does, the vehicle remains easily braked. Customer verbatims indicate, and Ford's evaluations of complaint vehicles support, that drivers are typically able to quickly remedy the condition by tapping the accelerator pedal or easily maneuver the vehicle with only a slight increase in braking effort to safely bring the vehicle to a stop. In addition, the overall incident rates of speed control cable interference with the throttle body returning to idle are very low especially considering the significant time in service and mileage on many of these vehicles.

Ford also found very few reports pertaining to the agency's additional concern regarding damage to the speed control cable collar at the mounting bracket. Based on these reports and an initial evaluation of the collar and its close proximity to several regular maintenance items, Ford believes any breaking or cracking of the collar at the mounting bracket likely results from improper vehicle maintenance and service repairs, and is not due to a defect in the cable attachment.

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

Sincerely,

Steven M. Kenner

Attachment



FORD MOTOR COMPANY (FORD) RESPONSE TO PE12-005

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.

In an April 18, 2012 email communication, received subsequent to the receipt of this Information Request, the agency advised that they had identified "a new failure mechanism for the speed control cable," specifically pertaining to a broken cable connector at the speed control cable attachment bracket. Ford has made every effort to accommodate the agency's specific requests pertaining to this additional condition in its response to this inquiry within the timeframe originally specified.

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 March 12, 2012, the date of your inquiry. Ford has searched within the following offices for responsive documents: Sustainability, Environment and Safety Engineering, Ford Customer Service Division, Quality, Global Core Engineering, Office of the General Counsel, Vehicle Operations, and North American Product Development.

Request 1

State, by make, model, cruise control (if optional equipment) and model year, the number of subject and peer vehicles Ford has manufactured for sale or lease in



the United States and federalized territories. Separately, for each subject vehicle manufactured to date by Ford, state the following:

- a. Vehicle identification number (VIN);
- b. Make;
- c. Model;
- d. Cruise Control (yes/no);
- e. Model Year;
- f. Date of manufacture;
- 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 2007, 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 Ford Taurus and Mercury Sable 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 394,765. All subject vehicles were originally equipped with cruise control.

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

Model	2005 MY	2006 MY
Taurus	201,647	157,001
Sable	36,117	0

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

Ford records indicate that the approximate total number of peer Ford Taurus and Mercury Sable 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 1,522,706.

The number of peer vehicles originally equipped with cruise control sold in the United States by model and model year is shown below:

Model	2001 MY	2002 MY	2003 MY	2004 MY
Taurus	336,028	308,898	327,708	199,691
Sable	98,986	105,404	64,462	42,231

The number of peer vehicles not originally equipped with cruise control sold in the United States by model and model year is shown below:

Model	2001 MY	2002 MY	2003 MY	2004 MY
Taurus	16,667	12,702	6,600	3,329
Sable	0	0	0	0

The requested data for each peer vehicle is provided in Appendix A - Peer.

#### Request 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 defect in the subject and 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 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	Alleged throttle interference with speed control cable detachment at the throttle body
A2	Alleged inoperative cruise control with speed control cable detachment
A3	Alleged high/excessive engine idle speed - unknown cause
A4	Alleged cruise control inoperable – unknown cause
A5	Alleged speed control cable damaged/broken/cracked at mounting bracket
B1	Alleged high idle/stuck throttle/vehicle continues to accelerate – speed control cable broken/replaced (no mention of detachment)
B2	Alleged cruise control inoperable – cable related – ambiguous if detached at the throttle body
B3	Alleged high idle/stuck throttle/vehicle continues to accelerate – ambiguous if related to speed control cable

Based on the agency's April 18, 2012 request previously discussed, Ford added category "A5" pertaining specifically to reports involving the cable attachment at the mounting bracket. Because the agency informed Ford of this potential cable connector condition to the mounting bracket after Ford had conducted its initial search for reports, Ford conducted a revised search to specifically identify reports potentially related to the cable attachment at the mounting bracket, as summarized in Appendix B.

Ford interprets the phrase "excessive idle" in the alleged defect as engine idle speeds above what would be considered a normal operating characteristic of the vehicle or above what would occur as part of the vehicle's warm-up strategy upon start-up. Accordingly, allegations of high or excessive idle speeds in gear, Park, or Neutral with an unknown cause are provided in this response. We are providing electronic copies of these and other 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.

Ford does not interpret the phrase "excessive idle...in gear" to include broad, generalized allegations of a sticky pedal, vehicle surge, or sudden acceleration that would be uncharacteristic with the symptoms associated with cable detachment or a broken cable connector at the mounting bracket. Accordingly, Ford is not providing reports that, for example, state "vehicle surges at low speed," "vehicle suddenly accelerated," "vehicle accelerates when I put my foot on the brake," or "vehicle would suddenly speed up."

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 in a subject or peer vehicle are provided in the MORS III portion of the database contained in Appendix C - Subject or Appendix C - Peer. 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. To the extent that responsive (i.e., not ambiguous) owner reports indicate that they are Legal Contacts, Ford has gathered the related files from the Office of General Counsel (OGC). No Legal Contacts that were related to the responsive owner reports were located on subject vehicles. Non-privileged documents for files that were located that are related to the responsive owner reports on peer vehicles are provided in Appendix D - Peer. Ford notes that it was unable to locate a total of 39 files.

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 in a subject or peer vehicle 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 30 Vehicle Owner Questionnaires (VOQs) on the subject vehicle population, 15 of which were duplicative of reports received by Ford that are provided in Appendix C. An additional seven VOQs on the peer population were provided as part of the agency's April 18, 2012 email communication, two of which were duplicative of reports received by Ford that are provided in Appendix C. 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.

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. Copies of reports corresponding to these alleged incidents are provided in the MORS, CQIS, 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 in a subject or peer vehicle, Ford has gathered claim and lawsuit information maintained by Ford's OGC. Ford's OGC is responsible for handling product liability lawsuits, claims, and consumer breach of warranty lawsuits and arbitrations against the Company.

Lawsuits and claims gathered in this manner were reviewed for relevance and sorted in accordance with the categories described above. Ford has also located other lawsuits, claims, or consumer breach of warranty lawsuits, each of which is ambiguous as to whether it meets the alleged defect criteria. We have included these lawsuits and claims as "non-specific allegations" for your review because of the broad scope of the request. Based on our



engineering judgment, the information in these lawsuits and claims is insufficient to support a determination that they pertain to the alleged defect.

We are providing the requested detailed information, where available, on the responsive and ambiguous lawsuits and claims in our Log of Lawsuits and Claims, provided in Appendix C in the Legal Claim/Lawsuits tabs. The number of relevant lawsuits and claims identified is also provided in these logs. To the extent available, copies of complaints, first notices, or MORs reports relating to matters shown on the logs are provided in Appendix E – Subject or Appendix E - Peer. With regard to these lawsuits and claims, Ford has not undertaken to contact outside law firms to obtain additional documentation. Ford notes that it was unable to locate four claim files and, therefore, is unable to determine if the cases are related to the alleged defect.

### 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 2007, 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 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 the Log of Lawsuits and Claims 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 shown on the Log of Lawsuits and Claims (provided in Appendix C in the Legal Claim/Lawsuits tab) are provided in Appendix E. 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 and peer 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 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;
- k. Cause and Correction, as stated by dealer/technician; and
- k. Comment, if any, by dealer/technician relating to claim and/or repair.

Provide this information in Microsoft Access 2007, 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 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 in a subject or peer vehicle 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.

Ford assumes that providing the warranty claims in the electronic database format meets the requirements of this request because the agency can review or order the claims as desired.

#### Request 6

Describe in detail the search criteria used by Ford to identify the claims identified in response to Request No. 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 and 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 subject and peer vehicles, whether any of those plans would cover repairs to the subject component to correct the alleged defect, 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 2001 through 2006 model year Ford Taurus and Mercury Sable 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 F. As of the date of the information request, 303,804 new vehicle ESP policies had been purchased on 2001 through 2006 model year Ford Taurus and Mercury Sable vehicles, all of which cover the subject speed control cable. Ford notes that only the PremiumCare ESP provided coverage for the subject throttle body. As of the date of the information request, 202,672 new vehicle ESP policies had been purchased on 2001 through 2006 model year Ford Taurus and Mercury Sable vehicles that cover the subject throttle body.

#### Request 7

Produce copies of all service, warranty, and other documents that relate to, or may relate to, the alleged defect in the subject and peer 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 the agency's request, 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 five SSMs and one TSB that may relate to the agency's request and is providing copies of them in Appendix G. These messages relate to a high or fast idle condition at start-up, when cold, at low mileage, or when the air conditioning compressor is engaged. Most of these are normal characteristics of the vehicle based on the powertrain control module programming.

Internal Service Messages: Ford has identified one ISM that may relate to the agency's request and is providing a copy in Appendix G. This message relates to technicians incorrectly diagnosing the cruise control as inoperable.

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

In addition to the messages provided in Appendix G that are responsive to this request, Ford is also providing additional messages in Appendix H that further demonstrate the various conditions at which a high idle or surge condition may occur or be considered normal on both the subject and peer vehicles. Further discussion on these messages can be found in Ford's response to Request 12.

#### 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 and peer 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 conducted a diligent search for not only studies, surveys, and investigations related to the alleged defect, but also notes, correspondence, and other communications that may pertain to this request. Accordingly, Ford is providing the responsive non-confidential Ford documentation in Appendix I.

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.

In the interest of ensuring a timely and meaningful submission, Ford is not producing materials or items containing little or no 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. If the agency would like additional materials, please advise.

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 and peer 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.

Answer

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

Ford currently has no plans for modifications related to the subject components in the subject vehicles.

Request 10

Produce one of each of the following:

- a. Exemplar samples of each design version of the subject component;
- b. Field return samples of the subject component exhibiting the subject failure mode; and
- c. Any kits that have been released, or developed, by Ford for use in service repairs to the subject component/assembly with relate, or may relate, to the alleged defect in the subject vehicles.

Answer

Two powertrains were available on both the subject and peer vehicles: the 3.0L 2-valve Vulcan engine and the 3.0L 4-valve Duratec engine.

In 2001 through 2003 model year Ford Taurus and Mercury Sable vehicles, the speed control cable, throttle body attachment arm, cable mounting bracket and cable routing were unique for the two available engines.

Beginning with the 2004 model year, the above components used on the 4-valve Duratec engine were also used on the 3.0L 2-valve Vulcan engine.

Ford has separately shipped the following parts to the agency in accordance with this request:

3.0L 2-valve Vulcan engine:

- a. One exemplar sample of speed control cable YF1Z-9A825-CA (2004-2006 MY);
- b. One exemplar sample of speed control cable YF1Z-9A825-AA (2001-2003 MY);
- c. One exemplar sample of throttle body design 3F1Z-9E926-AA (2004-2006 MY);
- d. One exemplar sample of throttle body design YF1Z-9E926-AB (2001-2003 MY); and
- e. One speed control cable and throttle body from a vehicle exhibiting the alleged failure mode returned from the field with VIN number 1FAFP56275A206290 (2005 MY).

3.0L 4-valve Duratec engine:

- a. One exemplar sample of speed control cable YF1Z-9A825-CA (listed above); and
- b. One exemplar sample of the Duratec throttle body design 4F1Z-9E926-CD.

No kits have been released or developed for use in service repairs to the subject component/assembly that relate, or may relate, to the alleged defect in the subject vehicles.

Ford is providing the speed control cable drawings for both speed control cable designs as requested in an April 18, 2012 email request from the agency with a request for confidentiality under separate cover, on separate media, to the agency's Office of the Chief Counsel pursuant to 49 CFR, Part 512. These drawings are provided in Confidential Appendix K.

Request 11

State the number of each of the following that Ford has sold that may be used in the subject and peer 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; 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

As the agency is aware, Ford service parts are sold in the U.S. to authorized Ford and Lincoln 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 speed control cable assemblies, and throttle body assemblies by part number (both service and engineering) by year and month/year (last three years only) of sale, where available, in Appendix L. Information pertaining to production and service usage for each part number, and supplier point of contact information, is included in Appendix L.

#### Request 12

Furnish Ford's assessment of the alleged defect in the subject and peer 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, including Ford's assessment of the minimum and maximum throttle opening that can result from the subject condition and state the basis for each (include assessment of complaints and engineering/testing data, if available)
- e. Provide a graph of engine speed vs. throttle opening (in degrees and in percent of WOT) for an unloaded (i.e. transmission in Park or Neutral) engine (cold and warm);
- f. 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, including all warnings of cruise control cable detachment that would be available to an owner/operator that does not routinely use cruise control; and
- g. The reports included with this inquiry.

#### Answer

##### Allegations of Speed Control Cable Detachment with Throttle Interference

The agency's original focus for this investigation, as stated in its information request, was on "incidents of cruise control cable detachment at the throttle body attachment resulting in



interference with throttle linkage return to idle....." The vast majority of reports identified in Ford's searches that allege cruise control cable detachment with throttle linkage interference (category "A1") pertain to 2004 through 2006 model year vehicles equipped with the 2-valve Vulcan engine. The rate of reports on these vehicles is still very low at 0.39R/1000; the rate of reports on all other model years and engine combinations is 0.03R/1000. Ford also identified "ambiguous" reports (categorized as "B1") that allege high idle where the cable was replaced, but these reports contain no mention of cable interference with the throttle arm. Even if these ambiguous reports were to be combined with the responsive A1 reports, the rate for the 2004 through 2006 model year vehicles still remains very low at 0.72R/1000, given the time in service on this vehicle population.

While the reports identified by Ford indicate that the speed control cable on some vehicles can become detached from the throttle body and, in some cases, allegedly interfere with the throttle body's full return to idle position, these reports also indicate that the effect is typically minor in nature without notable effect on vehicle speed. Customer comments also indicate that the condition is usually infrequent, and is often rectified by simply tapping the accelerator pedal. Even in the few instances where the condition was not alleviated in such a manner, customers indicate that they were able to safely control the vehicle and either pull to the side of the road or drive to a desired location, place the vehicle in park or neutral and shut the vehicle off.

As part of this investigation, Ford evaluated three complaint vehicles in an effort to better understand this condition and its associated symptoms. Each vehicle exhibited the condition and each was found to be easily controllable with almost no notable increase in braking effort even when the cable detachment inhibited full throttle return to idle. Detailed information regarding each of those vehicle evaluations is provided below:

1) VIN 1FAFP56275A [REDACTED]

The first vehicle evaluated was a 2005 model year Ford Taurus equipped with a 2-valve Vulcan engine. This customer contacted an acquaintance at Ford after the date of this information request (although there is no corresponding report in the data provided in Appendix C, Ford is providing a copy of this complaint in Appendix M), stating their vehicle exhibited this condition. During the vehicle inspection, it was noted that the cruise control cable was detached. The vehicle was then driven and, after several attempts, throttle interference was reproduced with the detached speed control cable catching on the throttle body nail-head at approximately 10.6% throttle and 2100 rpm in Drive.

In an effort to reproduce the throttle interference condition, the vehicle was driven on rural roads ranging from speed limits of 35 mph to 55 mph. Ford observed that it was somewhat difficult to maintain the interference condition long enough to perform the necessary evaluation as the speed control cable had a tendency to dislodge itself from the throttle body due to road vibration, bumps in the road, or engine roll, in addition to any application of the accelerator pedal. After reproducing the throttle interference condition, the vehicle was easily braked and controlled, and was driven for several miles while maintaining speeds at or below the recommended speed limit, as well as pulling the vehicle to a safe stopping location. At normal stopping distances only a slight increase in braking effort was required to completely stop the vehicle and pull the vehicle into a parking space at a nearby parking lot. It was not until the vehicle was placed in Park without



dislodging the cable interference that the engine speed began to increase until the maximum engine speed limit in Park of 4000 rpm was eventually achieved.

The speed control cable and throttle body from this vehicle have been provided to the agency in response to Request 10.

2) VIN 1FAFP53235A [REDACTED]

The second vehicle evaluated was also a 2005 model year Ford Taurus equipped with a 2-valve Vulcan engine. During the initial inspection of the vehicle, it was discovered that the speed control cable was not only disconnected from the throttle body, but had been taped in the fully retracted cable position by the customer. After removing the tape, it was noted that the speed control cable retention fitting was no longer effective in retaining the cable to the throttle body and the throttle body nail-head connection moved freely within the cable attachment. Once again, the vehicle was driven in an effort to reproduce a throttle interference condition. Although even more difficult to reproduce than the first complaint vehicle, the stuck throttle condition could be duplicated while driving with the detached speed control cable catching on the throttle body nail-head at approximately 14.9% throttle and 2200 rpm in Drive. At this condition, the vehicle was again easily braked and the throttle interference condition was easily alleviated by tapping on the accelerator pedal. Ford notes that once the speed control cable became dislodged from the throttle interference condition, it was necessary to stop the vehicle and manually orient the detached cable end near the throttle body nail-head in order to once again create the interference condition while driving.

Vehicle controllability and brake pedal effort while stopping was once again evaluated. This time the cable was manually oriented near the throttle body and driven at both highway speeds of up to 70 mph as well as rural roads ranging from 45 to 55 mph. After eventually reproducing the throttle interference condition, the vehicle was again easily braked, and was driven for several miles while maintaining speeds at or below the recommended speed limit, as well as pulling the vehicle to a safe stopping location. The driver was able to exit the highway, locate a nearby parking lot and park the vehicle with only a slight increase in braking effort. Once again, it was not until the vehicle was placed in Park that the engine speed began to increase. Ford notes that as the engine speed increased, the vibration from the engine would repeatedly cause the speed control cable to become dislodged from the throttle body. Therefore, the maximum engine speed attainable for this vehicle with the transmission in Park was 3800 rpm.

3) VIN 1FAFP53U75A [REDACTED]

The third vehicle evaluated was also a 2005 model year Ford Taurus equipped with a 2-valve Vulcan engine. The initial vehicle inspection again showed that the speed control cable was detached from the throttle body. Upon driving the vehicle, several unsuccessful attempts were made to reproduce the throttle interference condition. However, similar to the second complaint vehicle, if the speed control cable was manually positioned at or near the throttle body nail-head attachment, a throttle interference condition was able to be duplicated while driving. With the detached speed control cable catching on the throttle body nail-head, Ford was able to measure approximately 5.8% throttle opening and 1600 rpm in Drive, with



a maximum observed engine speed of 2200-2300 rpm. Once again, the vehicle was easily braked and the throttle interference condition was alleviated by tapping on the accelerator pedal.

In order to evaluate vehicle controllability and brake pedal effort while stopping, the cable was manually positioned near the throttle body nail-head connection and driven at highway speeds of up to 70 mph and city driving speeds between 25 and 35 mph during morning rush-hour traffic. The throttle interference condition was reproduced several times, in both scenarios, and the vehicle was again easily braked and driven while maintaining speeds at or below the recommended speed limit, or while pulling the vehicle to a safe stopping location. Ford also evaluated this vehicle in rush-hour city driving where shorter stopping distances were required. Even in these conditions the driver was able to stop the vehicle with only a minor increase in braking effort from what would normally be required. As with each of the other vehicles evaluated, it was not until the vehicle was placed in Park that the engine speed began to increase with a maximum observed engine speed of approximately 3600 rpm.

In summary, there was almost no notable effect of speed control cable interference with the throttle in any of these vehicles. It was difficult to maintain the interference condition because the slightest movement of the accelerator pedal resulted in release of the throttle. When care was taken to maintain the interference, braking effort increase was negligible.

To better evaluate the potential throttle position resulting from interference with a detached cable, Ford conducted a theoretical stack-up analysis of the speed control cable length from the attachment bracket to the throttle body. This analysis indicates a maximum theoretical throttle opening of 16.4% using the maximum length of the speed control cable assembly from the attachment bracket to the throttle body clip, and maximum tolerances for both the speed control cable clip and throttle body nail-head outside diameter. This stack-up analysis assumed the components were rigid when in reality the bending, flexing and stretching of the cable would result in smaller amounts of interference and subsequent throttle opening. This is supported by data gathered during Ford's inspection of several other vehicles during an employee vehicle clinic. As part of these inspections, Ford evaluated the potential throttle opening that might result from a cable detachment with interference. The resulting throttle opening positions created from these evaluations ranged from approximately 2.0% to 9.8%, well below the results from Ford's theoretical stack-up analysis.

To evaluate the potential effect this condition could have on engine torque and, as a consequence, on braking effort, Ford also gathered throttle angle and brake torque data at engine speeds of 2000 rpm and 2500 rpm. Using this information, Ford determined that if a speed control cable detachment and interference condition resulted in the maximum theoretical throttle opening of 16.4%, it would result in approximately 2100 engine rpm in gear, and approximately 65 pound-feet of torque from the powertrain. These data were plotted and are provided in Appendix N. As demonstrated through vehicle evaluations as well as in the customer verbatims, these vehicles remain easily braked under these conditions.

In addition to these complaint vehicles, Ford also evaluated braking efforts resulting from a throttle position of just over 16%. There was no notable difference in braking effort required to brake the vehicle at this throttle opening even after repeated application at multiple speeds.



### Allegations of Speed Control Cable Detachment without Throttle Interference

During Ford's analysis of reports associated with this response, Ford found that the majority (approximately 77%, categorized as "A2") of reports alleging speed control cable detachment do not allege any throttle interference. Although these reports were requested by the agency as part of the "alleged defect" definition and accordingly are provided with this response, it is notable that these reports make no assertion that the detached cable had any effect on the throttle and, therefore, no effect on vehicle speed. This was found for both the subject vehicles as well as peer vehicles and is consistent with our evaluations of the condition as described above.

As it pertains to subject vehicles, Ford's vehicle evaluations found that throttle interference with a detached cable was not easy to duplicate, and when it could be duplicated the interference was often dislodged by vehicle vibration or alleviated tapping the accelerator pedal. Given the tenuous nature of this condition, it is understandable and conceivable that the majority of vehicles with detached cables may not experience throttle interference as a consequence, and may simply exhibit inoperative cruise control function caused by a disconnected cable.

As it pertains to peer vehicles, the nature of the reports is even more disparate. For 2003 model year vehicles with the 2-valve engine and "earlier generation" cruise control cable/throttle body attachment design, only 2% of the reports of cable detachment indicate any interference with the throttle. Ford was not able to locate and inspect a complaint vehicle with an alleged cable disconnection on this earlier design of the speed control cable (YF1Z-9A825-AA) and throttle body (YF1Z-9E926-AB) combination found on a 2001 through 2003 model year vehicle equipped with the 2-valve Vulcan engine, as depicted in a picture attached to an email communication from the agency on April 18, 2012. Instead, Ford evaluated a vehicle of this configuration by manually disconnecting the speed control cable from the throttle body and creating a throttle interference condition similar to that shown in the picture from the agency. Under these conditions, the maximum attainable engine speed was approximately 1800 rpm in Park and approximately 900 rpm once load was put on the engine by placing it in Drive. Even if a throttle interference condition such as this were to occur on this particular cable/throttle body design, the resulting minimal engine RPM increase would likely be inconsequential to the driver and go virtually unnoticed.

### Allegations of High Idle

The agency's alleged defect definition included "...excessive idle speeds in gear, park, or neutral..." As previously described in Ford's response to Request 2, Ford interprets the phrase "excessive idle" in this context to mean idle speeds above what would be considered normal warm-up and operating characteristics of the vehicle. Ford does not interpret the phrase "excessive idle...in gear" in this context to include broad, generalized allegations of a sticky pedal, vehicle surge, or sudden acceleration that would be uncharacteristic with the symptoms associated with cable detachment or a broken cable at the mounting bracket. Therefore, Ford has provided reports where there was an unknown cause or the problem could not be duplicated; these are categorized as "A3." Ford believes the vast majority of these reports are not related to a speed control cable detachment condition, but pertain to other operating characteristics of this vehicle.

One of the normal operating characteristics of the subject and peer vehicles is a high idle under certain conditions. This is part of the vehicle calibration to prevent spark plug fouling and increase customer satisfaction. As demonstrated in the engine speed sweeps requested



by the agency, this is most prevalent at start-up and when the vehicle is cold. The agency had requested engine speed vs. throttle opening sweeps in Neutral on an unloaded engine, at both cold and warm engine temperatures. Ford is providing these sweeps at ambient and cold temperatures (under 38 degrees Fahrenheit) on both an unloaded engine in Neutral as well as a loaded engine in Drive. These sweeps are provided in Appendix O. These plots demonstrate the effect that temperature can have on engine idle speed resulting from calibration differences. For example, the 2-valve Vulcan engine exhibited higher engine speeds when cold, with the neutral sweeps demonstrating an approximate increase of 750 rpm at no load when compared with the same conditions at warmer ambient temperatures.

Engine speed sweeps were also performed using a 4-valve Duratec engine at warmer ambient temperatures and are also provided in Appendix O. However, local weather conditions and time precluded the sweeps from being done in cold conditions but the results would be expected to be similar to those found on the 2-valve Vulcan engine.

An elevated engine speed can also occur while driving due to vehicle calibrations related to emissions or transmission shifting, or especially when accessories such as the air conditioning are being used or the engine cooling fans are operating. Ford has attempted to balance the need for a higher idle in these vehicles while maintaining or improving customer satisfaction. Over the years Ford has issued at least a dozen TSBs and SSMS to address a variety of driveability symptoms in these vehicles, including engine idle speed fluctuations that result from engine calibration or other issues (reference the documents provided in Appendix G and Appendix H in response to Request 7). Ford is providing category "A3" reports because they are responsive to the agency's request; however, Ford believes the vast majority of these reports relate to one of a number of conditions and not speed control cable detachments.

#### Inoperative Cruise Control

The agency also requested reports of "...inoperative cruise control of unknown cause." Ford has categorized these reports as "A4." As the agency is aware, cruise control systems can become inoperative for a variety of reasons. Because there is no "cause" stated in these reports, Ford believes that it is difficult to attribute these allegations to a speed control cable detachment on either the subject or peer vehicles. Ford notes that it conducted safety recall 01S08 on certain 2000 and 2001 model year Taurus and Sable vehicles to replace the stop lamp switch that could result in a cruise control inoperable condition. That population was later expanded in March 2004 through safety recall 04S12 (provided in Appendix H) to include additional 2001 through 2003 model year Taurus and Sable vehicles. Of the 234 "A4" allegations on peer vehicles, 202 of them are on model year 2001 through 2003 vehicles encompassed by the safety recall expansion. Ford believes that many of these "A4" reports are likely a result of prior attempts to diagnose a cruise control inoperative condition prior to the expansion of the safety recall.

#### Speed Control Cable at the Mounting Bracket

In an email communication from Mr. Jeff Quandt on April 18, 2012, the agency advised that they had identified "a new failure mechanism for the speed control cable" where the speed control cable attachment could fracture at the mounting bracket point and potentially interfere with the throttle's ability to return to idle. The agency had requested a drawing of the speed control cable assembly along with supplier contact information. This information is provided in Appendix K and Appendix L, respectively.



Ford's search criteria to identify reports potentially pertaining to this condition is provided in Appendix B. The majority of the reports located by Ford that alleged a broken cable were ambiguous as to what portion of the cable assembly was broken. A total of nine reports were identified that specifically indicated some sort of damage to the connector at the mounting bracket. These reports are categorized as "A5" in Appendix C and are detailed below.

Of the nine reports, one was from the subject vehicle population, and the remaining eight reports were from the peer population. A brief summary of each allegation identified in the nine reports is shown below:

- Rattle under the hood
- A broken cable that was discovered while the customer was performing a repair
- High idle
- Throttle sticking
- Inoperative cruise control (two reports, one of which had the speed control cable disconnected from the throttle body and damaged/bent at the throttle body attaching bracket)
- Cruise control not turning off
- Stuck pedal
- Vehicle surge "up to 50 mph from 30 mph."

Although Ford has had limited time to evaluate this additional condition postulated by the agency, it is unclear to Ford how the cable's "collar" attachment to the bracket can become damaged during normal vehicle operation, as depicted in the photograph provided by the agency. Ford evaluated the cable attachment on a 2007 model year Taurus vehicle equipped with a 2-valve Vulcan engine which has the same configuration as a 4-valve Duratec engine in the subject and peer vehicle population. A force was applied in three separate directions on the cable near the speed control cable bracket collar connector using a push-pull gauge. A force of more than 50 pound-force was applied in each test. In all three tests, the cable collar withstood the applied force and did not break. After the third test, the collar showed stress whitening in the same location where the breakage occurred in the photos provided by the agency.

Ford's measurements found that the maximum force applied to the cable during normal operation was approximately 10 pound-force, well below the force applied in Ford's evaluation. The results of these tests are provided in Appendix P. Ford's evaluations did find that the potential throttle opening caused by cable interference at a fractured collar can be between 25-29%.

Ford notes that some vehicle maintenance procedures, such as changing the spark plugs, require the removal of the speed control cable to prevent damage during service. In addition, the speed control mounting bracket and the cable routing are in close proximity to items that require regular maintenance and replacement, such as the battery and air filter. This is particularly the case on the 4-valve Duratec engine or on the 2004 model year and later 2-Valve Vulcan engine, as the reports indicate.

The cable collar could become damaged either by failure to properly remove the cable when performing vehicle maintenance in its vicinity or by damaging the cable collar when removing it from the bracket. Though the agency has speculated that cable routing and consequent contact with other underhood components may induce vibrational loads into the collar sufficient to cause collar fracture, at this point Ford has found no evidence to support this as a likely cause of collar fracture. Based on these initial evaluations and observations, we believe

the breaking or cracking of the speed control cable collar at the mounting bracket likely results from improper vehicle maintenance and service repairs, and not due to a defect in the cable attachment.

#### Accidents and Injuries

Ford has received a small number of accident allegations associated with this subject in these vehicles. Based on Ford's drive evaluations of complaint vehicles, the symptoms associated with cable detachment and interference with the throttle show that vehicles remain easily controllable and that any incremental braking effort required to stop a vehicle is minimal. While the potential throttle opening can be higher on a vehicle with a fractured cable collar attachment at the mounting bracket as just discussed, the numbers of reports of this condition are very few, and Ford's initial analysis suggests that such fracture likely results from improper maintenance.

#### Conclusion

The overall incident rates of speed control cable interference with the throttle body returning to idle remain very low especially considering the significant time in service and mileage on many of these vehicles. Despite the potential for the speed control cable to detach at the throttle body on some vehicles, the customer reports and Ford's vehicle evaluations demonstrate that it is very unlikely to interfere with the throttle operation and if it does, the condition does not present a vehicle control risk. Furthermore, the reports show that drivers are able to quickly remedy the condition or easily maneuver the vehicle with only a very slight increase in braking effort to safely bring the vehicle to a stop. Ford's evaluations of complaint vehicles support this conclusion.

Additionally, Ford's evaluations of the agency's additional concern regarding collar damage at the mounting bracket found very few reports and likely vehicle-related cause for collar fracture, suggesting that such reports likely resulted from damage during vehicle maintenance, given the time in service in this population of vehicles.

Ford believes that consideration of all of these findings support a conclusion that there is no unreasonable risk to motor vehicle safety associated with this subject.

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**2001 through 2006 Ford Taurus and Mercury Sable  
Speed Control Cable Detachment Preventing the Throttle from Returning to Idle**

**OWNER REPORTS**

As the agency is aware, within FCSD's North American Customer Service Operations, there is a Customer Relationship Center (CRC) that is responsible for facilitating communication between customers, dealerships and Ford Motor Company. Among other things, the CRC handles telephonic, electronic, and written inquiries, suggestions, informational requests, and concerns ("contacts") from Ford and Lincoln-Mercury vehicle owners about their vehicles or sales and service experience. The contacts are handled by CRC customer service representatives who enter a summary of the customer contact into a database known as CuDL (Customer Data Link). Certain contacts, such as letters from customers, are entered into the CuDL database. Those that were entered into the earlier MORS II system were also microfilmed. More recently, the records in MORS III/CuDL are imaged and stored electronically.

The CRC assigns to each vehicle-related contact report a "symptom code" or category that generally characterizes the nature of the customer contact or vehicle concern, as described by the owner. The CRC does not undertake to confirm the accuracy of the description provided by the owner; they simply record what is reported. Therefore, given the complexity of the modern motor vehicle, it is Ford's experience that a significant percentage of owner contacts do not contain sufficient information to make a technical assessment of the condition of the vehicle or the cause of the event reported. Accordingly, although MORS contact reports may be useful in identifying potential problems and trends, the records are not the empirical equivalent of confirmed incidents and/or dealership's diagnosis. In the interest of responding promptly to this inquiry, Ford has not undertaken to gather the electronic images related to these contacts because of the largely duplicative nature of the information contained in the images, as well as the time and the burden associated with locating and producing those documents. The pertinent information related to those contacts generally would be included in the contact reports obtained from the CuDL system. To the extent that those documents exist, they are characterized in the comments of MORS III contact reports. Upon request, Ford will attempt to locate any specific items that are of interest to the agency.

In responding to this information request, Ford electronically searched CuDL using the following criteria:

Model Year: 2001 through 2006

Subject Vehicle: Ford Taurus and Mercury Sable vehicles manufactured for sale or lease in the United States, District of Columbia, Puerto Rico, Northern Mariana Islands, Guam, American Samoa and the Virgin Islands.

Date Parameters: January 1, 2000 through March 12, 2012 (the date of this inquiry)

Types of Contacts: All, including suspended data, canceled contacts and inquiries

MORS III Symptom Code(s):

Symptom Category	Symptom Code	Symptom Description
Driveability	610XXX	Buck/Jerk, All
Driveability	612XXX	Surge, All
Driveability	617XXX	Slow return to idle, All
Driveability	618XXX	Rolling idle, All
Driveability	619XXX	Fast idle, All
Driveability	620XXX	Engine Speed-Up/Flare, All
Driveability	624XXX	Accelerator Pedal, All

MORS III Reason Code(s):

Reason Code	Description
07	Legal Contacts

Word Searches:

In order to identify reports pertaining to the new failure mode identified by the agency in an email communication received April 18, 2012, of the speed control cable fracturing at the mounting bracket, the reports located using the search criteria described above were then searched using the Electronic Data Download System using a keyword process. Those reports that were identified by the keyword search described here were then manually reviewed for relevance. The following keyword searches were conducted:

All text was searched for any reference of "brok\*", "crack\*", or "brack\*".

**LEGAL CONTACTS**

Beginning in early 2008, most consumer complaints and all legal claim processing has been centralized in OGC within the Consumer Litigation team. A transition has occurred such that all legal contacts (including those formerly handled by "Litigation Prevention") are coordinated through this team.

Prior to the transition, there was a Consumer Affairs Department within FCSD that managed customer concerns, which could not be resolved by the Customer Relationship Center (CRC). Among other things, the Consumer Affairs Department had a section, known as "Litigation Prevention," that handled a variety of informal (i.e., non-litigation) claims, such as property damage claims or attorney demand claims.

The Litigation Prevention section had been centralized in the Consumer Affairs Department since 1995, in Dearborn, Michigan. Prior to that time, Litigation Prevention personnel operated on a regional basis. For matters that the Litigation Prevention section handled, there were typically paper files that reflected the handling, investigation and resolution of property damage claims.

The claims, known as "Legal Contacts" are entered into the CuDL database that the CRC uses to enter other customer communications. When a customer contact is designated as a Legal Contact, it is so indicated near the top of the contact report.



**FIELD REPORTS**

Within FCSD, there is a Vehicle Service & Programs Office that has overall responsibility for vehicle service and technical support activities, including the administration of field actions. That Office is the primary source within Ford of vehicle concern information originating from Ford and Lincoln-Mercury dealerships, field personnel, and other sources. The information is maintained in a database known as the Common Quality Indicator System (CQIS). The CQIS database includes reports compiled from more than 40 Company sources (e.g., Company-owned vehicle surveys, service technicians, field service and quality engineers, and technical hot line reports, etc.) providing what is intended to be a comprehensive concern identification resource. As with MORS contact reports, CQIS reports are assigned a "symptom code" or category that generally reflects the nature of the concern.

In responding to this information request, Ford electronically searched CQIS using the following criteria:

In July 2011, FCSD launched a new coding system for the CQIS database. All reports maintained in the CQIS database prior to the coding change have been re-coded using the new CQIS coding system.

Model Year: 2001 through 2006

Subject Vehicle: Ford Taurus and Mercury Sable vehicles manufactured for sale or lease in the United States, District of Columbia, Puerto Rico, Northern Mariana Islands, Guam, American Samoa and the Virgin Islands.

Date Parameters: January 1, 2000 through March 12, 2012 (the date of this inquiry)

Symptom Code(s):

Symptom Category	Symptom Code	Symptom Description
Drivers Aides and Information	222XXX	Speed Control, All
Start/Run/Move	443XXX	Unintended Movement, All
Driving Performance	5515XX	Idle Quality, Fast, All
Driving Performance	558XXX	Engine Surge, All
Driving Performance	559XXX	Unintended Accel, All

**Word Searches:**

In order to identify reports pertaining to the new failure mode identified by the agency in an email communication received April 18, 2012, of the speed control cable fracturing at the mounting bracket, the reports located using the search criteria described above were then searched using the Electronic Data Download System using a keyword process. Those reports that were identified by the keyword search described here were then manually reviewed for relevance. The following keyword searches were conducted:

All text was searched for any reference of "brok\*", "crack\*", or "brack\*".

**OASIS MESSAGES**

FCSD is responsible for communicating a variety of vehicle and service information, such as warranty information for up to the past 360 days, Extended Service Plan part coverage information, and technical repair information, to North American Ford and Lincoln-Mercury

dealers. This information is communicated primarily through OASIS, which serves as an electronic link between Ford Motor Company and the dealers. OASIS covers all North American Ford and Lincoln-Mercury cars and light trucks, and medium and heavy-duty Ford trucks, for the ten most current model years. Technical diagnostic and repair information on OASIS is contained in Special Service Messages (SSMs) and Technical Service Bulletin (TSBs) titles and brief summaries. It should be noted that dealers cannot access brief summaries.

SSMs and TSB titles are coded in OASIS by model year and vehicle line, and may be coded to other specific vehicle attributes (body style, engine code, or vehicle identification number) and one or more OASIS Service Code(s). The dealers with access to OASIS usually search for information on the database by entering a VIN and the applicable Service Codes. SSMs and TSB titles that become inactive or superseded continue to be accessible by Ford employees, but no longer are accessible by the dealers. Dealers also are able to determine the recalls applicable to a particular vehicle by searching a particular VIN in OASIS. Recall information available on OASIS cannot be searched by Service Codes.

In July 2011, FCSD launched a new coding system for OASIS. All active SSMs and TSB titles have been re-coded using the new OASIS coding system. All inactive and superceded SSMs and TSB titles are still maintained under the old coding system. In responding to this information request, Ford searched Global OASIS using both the new and old OASIS service codes for active, inactive, and superceded TSB titles and SSMs using the following search criteria:

Model Year: 2001 through 2006

Subject Vehicle: Ford Taurus and Mercury Sable vehicles manufactured for sale or lease in the United States, District of Columbia, Puerto Rico, Northern Mariana Islands, Guam, American Samoa and the Virgin Islands.

Date Parameters: January 1, 2000 through March 12, 2012 (the date of this inquiry)

OASIS Service Code(s):

Symptom Category	Symptom Code	Symptom Description
Driveability	610XXX	Buck/Jerk, All
Driveability	612XXX	Surge, All
Driveability	617XXX	Slow return to idle, All
Driveability	618XXX	Rolling idle, All
Driveability	619XXX	Fast idle, All
Driveability	620XXX	Engine Speed-Up/Flare, All
Driveability	624XXX	Accelerator Pedal, All
Drivers Aides and Information	222XXX	Speed Control, All
Start/Run/Move	443XXX	Unintended Movement, All
Driving Performance	5515XX	Idle Quality, Fast, All
Driving Performance	558XXX	Engine Surge, All
Driving Performance	559XXX	Unintended Accel, All



OASIS 2 and Global OASIS are not capable of performing electronic word searches, so the search results are reviewed manually to determine their applicability to the alleged defect in the subject vehicles.

The OASIS database also contains Broadcast Messages. Typically, these messages are directed to all dealerships and either are notifications of new SSMs/TSBs, or announcements with non-technical information (for example, "the Dealer Hotline will be closed today"). Broadcast Messages cannot be searched by OASIS service codes, and can be retrieved only while active (approximately 2 to 4 days). Ford has not undertaken to search for Broadcast Messages because Ford expects that any responsive information obtained with such a search generally would be non-substantive in nature or duplicative of the information obtained with the TSB title and SSM search described above.

### **INTERNAL SERVICE MESSAGES**

FCSD, as part of its technical support activities, maintains fleet and technical telephone "hotlines." During the early stages of Ford's efforts to identify and resolve potential vehicle concerns, hotline personnel may draft Internal Service Messages (ISMs) on CQIS for their internal use. The ISMs are assigned a CQIS "symptom code" or category that generally reflects the nature of the concern. An ISM can form the basis for an oral response over the technical hotline to an inquiry from an individual dealer or fleet technician. The ISMs, however, are not made available electronically to fleets and dealers. Therefore, although ISMs are not "issued" to dealers like OASIS messages, Ford is construing this request broadly to include ISMs that may be related to the alleged defect in the subject vehicles.

In responding to this information request, Ford searched CQIS for active ISMs using the following search criteria:

Model Year: 2001 through 2006

Subject Vehicle: Ford Taurus and Mercury Sable vehicles manufactured for sale or lease in the United States, District of Columbia, Puerto Rico, Northern Mariana Islands, Guam, American Samoa and the Virgin Islands.

Date Parameters: January 1, 2000 through March 12, 2012 (the date of this inquiry)

CQIS Symptom Code(s):

Symptom Category	Symptom Code	Symptom Description
Drivers Aides and Information	222XXX	Speed Control, All
Start/Run/Move	443XXX	Unintended Movement, All
Driving Performance	5515XX	Idle Quality, Fast, All
Driving Performance	558XXX	Engine Surge, All
Driving Performance	559XXX	Unintended Accel, All

The CQIS database in which the ISMs reside is not capable of performing word searches, so the search results were reviewed manually to determine their applicability to the alleged defect in the subject vehicles.

**FIELD REVIEW COMMITTEE**

Ford's Field Review Committee reviews all potential field service actions, including safety recalls and customer satisfaction programs, and recommends appropriate actions to corporate management. A Vehicle Service & Programs representative serves as Secretary to the Field Review Committee. Following approval of a field service action, the Vehicle Service & Programs Office prepares and launches the action. A representative copy of the communication to Ford's dealers, fleets, and Regional offices announcing the field service action is maintained in the Field Review Committee files.

**WARRANTY**

Ford's Analytical Warranty System (AWS) contains warranty claims and vehicle information for model years 1991 and forward for North America, and model years 1992 and forward for Europe.

Ford performed a search of AWS for potentially responsive reports using the following search criteria:

Model Year: 2001 through 2006

Subject Vehicle: Ford Taurus and Mercury Sable vehicles manufactured for sale or lease in the United States, District of Columbia, Puerto Rico, Northern Mariana Islands, Guam, American Samoa and the Virgin Islands.

Base Part Number(s):

9A825 – Speed Control Cable Assembly

9E926 – Throttle Body Assembly

Customer Concern Code(s):

CCC	Description
A26, V23	Speed control disengagement troubles
D11, V40	Engine idles too fast
D36, V52	Engine hesitates/surges when accelerating
D37, V52	Engine hesitates/surges/runs rough - startups
D41, V52	Engine hesitates/surges at steady speed
D52, V44	Accelerator pedal troubles

Word Searches:

In order to identify reports pertaining to the new failure mode identified by the agency in an email communication received April 18, 2012, of the speed control cable fracturing at the mounting bracket, the reports located using the search criteria described above were then searched using the Electronic Data Download System using a keyword process. Those reports that were identified by the keyword search described here were then manually reviewed for relevance. The following keyword searches were conducted:

All text was searched for any reference of "brok\*", "crack\*", or "brack\*".