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September 4, 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:

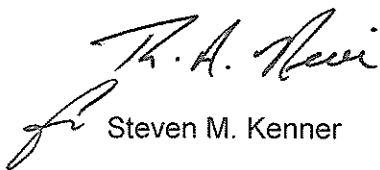
Subject: PE12-019:NVS-213dlr

The Ford Motor Company (Ford) response to the agency's July 17, 2012, letter concerning reports of alleged failure of the throttle to return to idle when the accelerator pedal is released based on speed control or accelerator cable failures in 2001-2004 Escape vehicles is attached.

Ford has conducted analysis of reports responsive to this investigation as part of our response to this information request. Based on these analyses, Ford believes that the recall actions voluntarily taken in 2004 (04S25) to address an accelerator cable quality issue, and in 2012 (12S37) to address the potential for speed control cable contact with the engine cover, are appropriate and effective.

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 PE12-019

Ford's response to this Preliminary Evaluation information request was prepared pursuant to a diligent search for the information requested. While we have employed our best efforts to provide responsive information, the breadth of the agency's request and the requirement that information be provided on an expedited basis make this a difficult task. We nevertheless have made substantial effort to provide thorough and accurate information, and we would be pleased to meet with agency personnel to discuss any aspect of this Preliminary Evaluation.

The scope of Ford's investigation conducted to locate responsive information focused on Ford employees most likely to be knowledgeable about the subject matter of this inquiry and on review of Ford files in which responsive information ordinarily would be expected to be found and to which Ford ordinarily would refer. Ford notes that although electronic information was included within the scope of its search, Ford has not attempted to retrieve from computer storage electronic files that were overwritten or deleted. As the agency is aware, such files generally are unavailable to the computer user even if they still exist and are retrievable through expert means. To the extent that the agency's definition of Ford includes suppliers, contractors, and affiliated enterprises for which Ford does not exercise day-to-day operational control, we note that information belonging to such entities ordinarily is not in Ford's possession, custody or control.

Ford has construed this request as pertaining to vehicles manufactured for sale in the United States, its protectorates, and territories.

Ford notes that some of the information being produced pursuant to this inquiry may contain personal information such as customer names, addresses, telephone numbers, and complete Vehicle Identification Numbers (VINs). Ford is producing such personal information in an unredacted form to facilitate the agency's investigation with the understanding that the agency will not make such personal information available to the public under FOIA Exemption 6, 5 U.S.C. 552(b)(6).

Answers to your specific questions are set forth below. As requested, after each numeric designation, we have set forth verbatim the request for information, followed by our response. Unless otherwise stated, Ford has undertaken to provide responsive documents dated up to and including July 17, 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, Purchasing, Quality, Global Core Engineering, Office of the General Counsel, Vehicle Operations, North American Product Development.

Request 1

State, by model and model year, the number of subject vehicles Ford has manufactured for sale or lease in the United States or a Federalized territory. Separately, for each subject vehicle manufactured to date by Ford, state the following:

- a. Vehicle identification number (VIN);
- b. Make;
- c. Model;
- d. Model Year;

- e. Date of manufacture;
- f. Assembly plant of manufacture;
- g. Equipped with cruise control as an option (yes/no);
- h. Subject recall applicability (yes/no);
- i. Subject recall completion date;
- j. Date warranty coverage commenced; and
- k. 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 "PE12-019 FORD PRODUCTION DATA SUBJECT VEHICLES." See Enclosure, 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 vehicles equipped with the 3.0L engine 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 546,688.

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

Model	2001 MY	2002 MY	2003 MY	2004 MY
Escape	140,285	152,626	149,108	104,669

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

### Request 2

State, by model and model year, the number of peer vehicles Ford has manufactured for sale or lease in the United States or a Federalized territory. 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. Equipped with cruise control as an option (yes/no);
- 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 "PE12-019 FORD PRODUCTION DATA PEER VEHICLES." See Enclosure, 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 peer vehicles equipped with the 2.0L engine 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 23,328.

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

Model	2001 MY	2002 MY	2003 MY	2004 MY
Escape	12,609	6,614	2,625	1,480

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

Request 3

State the number of each of the following, received by Ford, or of which Ford are otherwise aware, which relate to, or may relate to, the alleged defect in the subject vehicles:

- a. Consumer complaints, including those from fleet operators;
- b. Field reports, including dealer field reports;
- c. Reports involving a crash, injury, or fatality, based on claims against the manufacturer involving a death or injury, notices received by the manufacturer alleging or proving that a death or injury was caused by a possible defect in a subject vehicle, property damage claims, consumer complaints, or field reports;
- d. Property damage claims;
- e. Third-party arbitration proceedings where Ford is or was a party to the arbitration; and
- f. Lawsuits, both pending and closed, in which Ford is or was a defendant or codefendant.
- g. Expert reports prepared by Ford and provided to the opposing party, or provided by the opposing party and given to Ford regarding matters in litigation or arbitration, other than as to damages.

For subparts "a" through "c," 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 "d" 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 "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

The alleged defect, as defined in the Preliminary Evaluation, refers to five enumerated symptoms or conditions, some of which are distinct. For purposes of identifying reports of incidents that may be related to the alleged defect and any related documents, Ford 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, in hierarchical order:

Category	Allegation
A0	Alleged interference with speed/accelerator cable or cam
A1	Alleged stuck/sticky throttle or pedal due to the accelerator cable or speed control cable
A2	Alleged failure of the engine to return to idle due to the accelerator cable or speed control cable
A3	Alleged unintended acceleration or vehicle surge due to the accelerator cable or speed control cable
A4	Alleged speed control won't disengage due to the accelerator cable or speed control cable
A5	Alleged high or fast idle due to the accelerator cable or speed control cable
A6	Any other allegation with replacement of, or allegedly due to, the accelerator cable or speed control cable
A7	Unknown allegations allegedly "due to recall 04S25"
B1	Alleged stuck/sticky throttle or pedal – unknown or ambiguous cause
B2	Alleged failure of the engine to return to idle – unknown or ambiguous cause
B3	Alleged unintended acceleration or vehicle surge – unknown or ambiguous cause
B4	Alleged speed control won't disengage – unknown or ambiguous cause
B5	Alleged high or fast idle – unknown or ambiguous cause
D1	Alleged stuck/sticky throttle or pedal – other known cause unrelated to accelerator cable or speed control cable
D2	Alleged failure of the engine to return to idle – other known cause unrelated to accelerator cable or speed control cable
D3	Alleged unintended acceleration or vehicle surge – other known cause unrelated to accelerator cable or speed control cable
D4	Alleged speed control won't disengage – other known cause unrelated to accelerator cable or speed control cable
D5	Alleged high or fast idle – other known cause unrelated to accelerator cable or speed control cable

We are providing electronic copies of reports categorized as "B" as "non-specific allegations" for your review because of the broad scope of the request. Based on our engineering judgment, the information in these reports is insufficient to support a determination that they pertain to the alleged defect.

Owner Reports: Records identified in a search of the Master Owner Relations Systems (MORS) database, as described in Appendix B, were reviewed for relevance and sorted in accordance with the categories described above. The number and copies of relevant owner reports identified in this search in a subject vehicle are provided in the MORS III portion of the database contained in Appendix C. The categorization of each report is identified in the "Category" field.

When we were able to identify that responsive (i.e., not ambiguous) duplicate category "A" 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). Non-privileged documents for files that were located that are related to the responsive owner reports are provided in Appendix D. Ford notes that it was unable to locate one file.

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 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 category "A" 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 73 Vehicle Owner Questionnaires (VOQs), 49 of which were duplicative of reports identified in Ford's databases. 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 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 tab. The number of relevant lawsuits and claims identified is also provided in this log. To the extent available, copies of complaints, first notices, MORS reports, or the requested expert reports relating to matters shown on the log are provided in Appendix E.

#### Request 4

Separately, for each item (complaint, report, claim, notice, or matter) within the scope of your response to Request No. 3, state the following information:

- a. Ford's file number or other identifier used;
- b. The category of the item, as identified in Request No, 3 (i.e., consumer complaint, field report, etc.);
- c. Vehicle owner's or fleet name (and fleet contact person),
- d. Vehicle owner's or fleet address
- e. Vehicle owner's or fleet telephone number
- f. Vehicle's VIN;
- g. Vehicle's make;
- h. Vehicle's model;
- i. Vehicles model year;
- j. Vehicle's mileage at time of incident;
- k. Incident date;
- l. Report or claim date;
- m. Whether a crash is alleged;
- n. Whether property damage is alleged;
- o. Number of alleged injuries, if any; and
- p. Number of alleged fatalities, if any.

Provide this information in Microsoft Access 2007, or a compatible format, entitled "PE12-019 FORD REQUEST NUMBER THREE DATA (SUBJECT)," See Enclosure, Data Collection Disc, for a preformatted table which provides further details regarding this submission.

#### Answer

Ford is providing owner and field reports in the database contained in Appendix C in response to Request 3. To the extent information sought in Request 4 is available for owner and field reports, it is provided in the database. To the extent information sought in Request 4 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 5

Produce copies of all documents related to each item within the scope of Request No. 3. 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 3. Copies of complaints, first notices, MORS reports, or the requested expert 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 5 is available, it is provided in the referenced appendices.

Request 6

State the number of each of the following, received by Ford, or of which Ford are otherwise aware, which relate to, or may relate to, the subject 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 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, in hierarchical order:

Category	Allegation
A0	Alleged interference with speed/accelerator cable or cam due to the accelerator cable or speed control cable
A1	Alleged stuck/sticky throttle or pedal due to the accelerator cable or speed control cable
A2	Alleged failure of the engine to return to idle due to the accelerator cable or speed control cable
A3	Alleged unintended acceleration or vehicle surge due to the accelerator cable or speed control cable
A4	Alleged speed control won't disengage due to the accelerator cable or speed control cable
A5	Alleged high or fast idle due to the accelerator cable or speed control cable
A6	Any other allegation with replacement of, or allegedly due to, the accelerator cable or speed control cable
A7	Unknown allegations allegedly "due to the recall"
B1	Alleged stuck/sticky throttle or pedal – unknown or ambiguous cause
B2	Alleged failure of the engine to return to idle – unknown or ambiguous cause
B3	Alleged unintended acceleration or vehicle surge – unknown or ambiguous cause
B4	Alleged speed control won't disengage – unknown or ambiguous cause
B5	Alleged high or fast idle – unknown or ambiguous cause
D1	Alleged stuck/sticky throttle or pedal – other known cause unrelated to accelerator cable or speed control cable
D2	Alleged failure of the engine to return to idle – other known cause unrelated to accelerator cable or speed control cable
D3	Alleged unintended acceleration or vehicle surge – other known cause unrelated to accelerator cable or speed control cable
D4	Alleged speed control won't disengage – other known cause unrelated to accelerator cable or speed control cable
D5	Alleged high or fast idle – other known cause unrelated to accelerator cable or speed control cable

We are providing electronic copies of reports categorized as "B" as "non-specific allegations" for your review because of the broad scope of the request. Based on our engineering judgment, the information in these reports is insufficient to support a determination that they pertain to the alleged defect.

Owner Reports: Records identified in a search of the Master Owner Relations Systems (MORS) database, as described in Appendix B, were reviewed for relevance and sorted in accordance with the categories described above. The number and copies of relevant owner reports identified in this search in a peer vehicle are provided in the MORS III portion of the database contained in Appendix C. The categorization of each report is identified in the "Category" field.

When we were able to identify that responsive (i.e., not ambiguous) duplicate owner reports for an alleged incident were received, each of these duplicate reports was marked accordingly, and the group counted as one report. In other cases, certain vehicles may have experienced more than one incident and have more than one report associated with their VINs. These reports have been counted separately.

Legal Contacts: Ford is providing, in Appendix B, a description of Legal Contacts and the activity that is responsible for this information. 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). Ford notes that no responsive Legal Contacts were located for the peer vehicle population.

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 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.

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 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 tab. The number of relevant lawsuits and claims identified is also provided in this log. To the extent available, copies of complaints, first notices, or MORS reports relating to matters shown on the log are provided in Appendix E. With regard to these lawsuits and claims, Ford has not undertaken to contact outside law firms to obtain additional documentation.

Request 7

Separately, for each item (complaint, report, claim, notice, or matter) within the scope of your response to Request No. 2 6, 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 6 (i.e., consumer complaint, field report, etc.);
- c. Vehicle owner's or fleet name (and fleet contact person),
- d. Vehicle owner's or fleet address
- e. Vehicle owner's or fleet telephone number
- f. Vehicle's VIN;
- g. Vehicle's make;
- h. Vehicle's model;
- i. Vehicle's model year;
- j. Vehicle's mileage at time of incident;
- k. Incident date;
- l. Report or claim date;
- m. Whether a crash is alleged;
- n. Whether property damage is alleged;
- o. Number of alleged injuries, if any; and
- p. Number of alleged fatalities, if any.

Provide this information in Microsoft Access 2007, or a compatible format, entitled "PE12-019 FORD REQUEST NUMBER THREE DATA (PEERS)," See Enclosure, Data Collection Disc, for a preformatted table which provides further details regarding this submission.

Answer

Ford is providing owner and field reports in the database contained in Appendix C in response to Request 6. To the extent information sought in Request 7 is available for owner and field reports, it is provided in the database. To the extent information sought in Request 7 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 8

Produce copies of all documents related to each item within the scope of Request No. 6. 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 3 in response to Request 6. 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 8 is available, it is provided in the referenced appendices.

Request 9

State, by model and model year, a total count for all of the following categories of claims, collectively, that have been paid by Ford to date that relate to, or may relate to, the alleged defect in the subject vehicles: warranty claims; extended warranty claims; claims for good will services that were provided; field, zone, or similar adjustments and reimbursements; and warranty claims or repairs made in accordance with a procedure specified in a technical service bulletin or customer satisfaction campaign.

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

- a. Ford's claim number;
- b. Vehicle owner 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. Whether the claim is related to the subject recall remedy;
- j. Whether brake component overheating/damage was noted or included in the repairs;
- k. Replacement part number(s) and description(s);
- l. Concern stated by customer; and
- m. Comment, if any, by dealer/technician relating to claim and/or repair.

Provide this information in Microsoft Access 2007, or a compatible format, entitled "PE12-019 FORD WARRANTY DATA SUBJECT VEHICLES." See Enclosure, Data Collection Disc, for a pre-formatted table which provides further details regarding this submission.

Answer

Records identified in a search of the AWS database, as described in Appendix B, were reviewed for relevance and sorted in accordance with the categories described in the response to Request 3. The number and copies of relevant warranty claims identified in this search in a subject 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 category "A" 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.

Those records that relate to execution of the subject recall remedy (04S25), as requested in subpart (i) of Request 9 above, are provided separately in the AWS portion of the database contained in Appendix C.

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 3. Such claims that were honored are included in the warranty data provided.

#### Request 10

Describe in detail the search criteria used by Ford to identify the claims identified in response to Request 9, including the labor operations, problem codes, part numbers and any other pertinent parameters used. Provide a list of all labor operations, labor operation descriptions, problem codes, and problem code descriptions applicable to the alleged defect in the subject vehicles. State, by make and model year, the terms of the new vehicle warranty coverage offered by Ford on the subject vehicles (i.e., the number of months and mileage for which coverage is provided and the vehicle systems that are covered). Describe any extended warranty coverage option(s) that Ford offered for the subject vehicles and state by option, model, and model year, the number of vehicles that are covered under each such extended warranty.

#### Answer

Detailed descriptions of the search criteria, including all pertinent parameters, used to identify the claims provided in response to Request 9 are described in Appendix B.

For 2001-2004 model year Escape vehicles with 3.0L engine, 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, 111,139 new vehicle ESP policies had been purchased on 2001-2004 model year Escape vehicles with 3.0L engine.

#### Request 11

Produce copies of all service, warranty, and other documents that relate to, or may relate to, the alleged defect in the subject vehicles, that Ford has issued to any dealers, regional or zone offices, field offices, fleet purchasers, or other entities. This includes, but is not limited to, bulletins, advisories, informational documents, training documents, or other documents or communications, with the exception of standard shop manuals. Also include the latest draft copy of any communication that Ford is planning to issue within the next 120 days.

#### Answer

For purposes of identifying communications to dealers, zone offices, or field offices pertaining, at least in part, to 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 identified three SSMs and no TSBs that may relate to the agency's request and is providing copies of them in Appendix G.

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

Field Review Committee: In addition to the subject recall (04S25), Ford has identified one field service action communication that may relate to the agency's request and is providing a copy in Appendix G. Ford notes that documents pertaining to recalls 00S18, 04S25 and 12S37 have previously been provided to the agency in accordance with 49CFR Part 579, but we are also providing them again in Appendix G.

### Request 12

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 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. Whether the claim is related to the subject recall remedy;
- j. Whether brake component overheating/damage was noted or included in the repairs;
- k. Replacement part number(s) and description(s);
- l. Concern stated by customer; and
- m. Comment, if any, by dealer/technician relating to claim and/or repair.

Provide this information in Microsoft Access 2007, or a compatible format, entitled "PE12-019 FORD WARRANTY DATA PEER VEHICLES." See Enclosure, Data Collection Disc, for a pre-formatted table which provides further details regarding this submission.

Answer

Records identified in a search of the AWS database, as described in Appendix B, were reviewed for relevance and sorted in accordance with the categories described in the response to Request 6. The number and copies of relevant warranty claims identified in this search in a 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 6. Such claims that were honored are included in the warranty data provided.

Request 13

Describe in detail the search criteria used by Ford to identify the claims identified in response to Request 12, 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 peer vehicles. State, by make and model year, the terms of the new vehicle warranty coverage offered by Ford on the subject vehicles (i.e., the number of months and mileage for which coverage is provided and the vehicle systems that are covered). Describe any extended warranty coverage option(s) that Ford offered for the subject vehicles and state by option, model, and model year, the number of vehicles that are covered under each such extended warranty.

Answer

Detailed descriptions of the search criteria, including all pertinent parameters, used to identify the claims provided in response to Request 12 are described in Appendix B.

For 2001-2004 model year Escape vehicles with 2.0L engine, 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, 5,069 new vehicle ESP policies had been purchased on 2001-2004 Escape vehicles with 2.0L engine.

Request 14

Produce copies of all service, warranty, and other documents that relate to, or may relate to, the subject condition in the 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 no SSMs or TSBs that may relate to the agency's request.

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

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

Request 15

Describe all assessments, analyses, tests, test results, studies, surveys, simulations, investigations, inquiries and/or evaluations (collectively, "actions") that relate to, or may relate to, the alleged defect in the subject vehicles that have been conducted, are being conducted, are planned, or are being planned by, or for, Ford. For each such action, provide the following information:

- a. Action title or identifier;
- b. The actual or planned start date;
- c. The actual or expected end date;
- d. Brief summary of the subject and objective of the action;
- e. Engineering group(s)/supplier(s) responsible for designing and for conducting the action; and
- f. A brief summary of the findings and/or conclusions resulting from the action.

For each action identified, provide copies of all documents related to the action, regardless of whether the documents are in interim, draft, or final form. Organize the documents chronologically by action.

Answer

Ford is construing this request broadly and is providing not only studies, surveys, and investigations related to the alleged defect, but also notes, correspondence, and other



communications that were located pursuant to a diligent search for the requested information. Ford is providing the responsive non-confidential Ford documentation in Appendix H.

To the extent that the information requested is available, it is included in the documents provided. If the agency should have questions concerning any of the documents, please advise.

Ford is submitting additional responsive documentation in Appendix I with a request for confidentiality under separate cover to the agency's Office of the Chief Counsel pursuant to 49 CFR Part 512. Redacted copies of the confidential documents will be provided under separate cover, on separate media, to the agency's Office of Chief Counsel as Appendix I – Redacted.

Ford is not producing documents responsive to this request that are protected from disclosure by attorney-client privilege, work-product doctrine, or other applicable immunity. Documents protected from disclosure on these bases are described in a privilege log contained in Appendix J.

A summary of information pertaining to engine cover interference evaluations is provided in Ford's response to Request 20(d), (e) and (f).

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 16

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

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

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

Answer

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

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

Request 17

Provide the following information regarding the subject components:

- a. Provide copies of all failure mode and effects analyses (FMEA);
- b. Provide copies of all engineering specifications or other performance requirements;
- c. Provide a detailed description of all durability testing and copies of related test results;
- d. A list of all of the parts/subcomponents used in the subject component assembly, including a picture or drawing of each part, the name of the part, the material composition of the part, the ASTM (American Society for Testing and Materials) and Ford material specification/call-outs for all plastic parts; and
- e. Picture or drawing of the assembled part with all parts/subcomponents labeled.

Answer

- a. The subject components were designed and released for original production by Mazda. Accordingly, Ford does not own or possess the Component FMEA for these parts.
- b. The subject components were designed and released for original production by Mazda. Accordingly, Ford does not have Engineering Specifications (ES) for the original production parts. We are submitting Ford's ES for the replacement accelerator cable and speed control cable (3L84-9A825-AA and 5L84-9A758-AA) in Appendix L.
- c. Durability testing for the replacement cables is specified in the ES included in Appendix L.
- d. Ford purchased the accelerator and speed control cables as "black box" assemblies, therefore we do not have drawings of the assembly subcomponents. Drawings for the replacement accelerator cable and speed control cable assemblies are provided in Appendix L. A list of design changes is included in Appendix K. Ford made no design changes to the replacement accelerator cable 5L84-9A758-AA after it was released for the 04S25 recall program, and Ford made no design changes to the replacement speed control cable 3L84-9A825-AA after its release for 2003 model year vehicles.
- e. Drawings for the replacement accelerator and speed control cable assemblies are in Appendix L.

Request 18

Identify all subject component failure modes that Ford has identified including those alleged by consumers or third parties, that may result in a throttle interference condition (i.e., failure of the throttle to return to idle) and provide the following information about each:

- a. A description of the failure mode based on the location and affected subcomponents;
- b. A photograph or drawing the subject component with the location of each failure mode marked/labeled;
- c. A representative sample of a field return part displaying the condition (if sample parts are not available, provide photographs showing the condition);
- d. Ford's assessment of the known or suspected causes of the condition;
- e. Ford's assessment of the maximum throttle position (in percent throttle) that could be caused by the condition, including a detailed description of how the assessment was made;
- f. An Excel file entitled, "PE12-019 FAILURE MODE ANALYSIS", listing all incidents that have been confirmed or alleged for each condition, with the following information: (1) vehicle identification number; (2) incident date; (3) whether the subject component(s) was returned to Ford for inspection, testing or analysis; (4) whether photographs of the failure were taken; (5) summary of allegations regarding failure mode, cause(s) and incident severity; and (6) Ford assessment of the failure mode, cause(s) and incident severity; and
- g. A summary of all surveys, tests or other efforts conducted by, or for, Ford to assess the potential causes, frequency and/or severity of each condition.

Produce copies of all documents related to each item within the scope of Request #18. Organize the documents by category and describe the method Ford used for organizing the documents.

#### Answer

- a. Accelerator Cable As the agency is aware, Ford voluntarily conducted recall 04S25 involving an accelerator cable inner liner that may migrate out of the conduit at the dash panel end fitting and may come in contact with the accelerator pedal assembly. Under certain circumstances the pedal may not return to the fully released position.

Engine Cover As the agency is aware, Ford voluntarily conducted recall 12S37 involving the potential for a damaged speed control cable to contact the plastic engine cover.

Ford notes that other ambiguous allegations that may be related to the agency's request can be found in the reports provided in this response, but those reports do not contain enough detail to make a determination as to the cause. Ford has identified no pattern or substantive information pertaining to the nature of these unsubstantiated allegations, which are not atypical of the types of reports received on any vehicle model. Examples include:

- "cruise control cable end broken and bound up against intake manifold"
- "accelerator cable pinched on bracket on engine"
- "throttle was stuck wide open, tech states the cause for 4 little plastic clips at the throttle body bracket causing the cable to pull wide open"
- "cruise control may have been inadvertently activated due to it rubbing on the engine"
- "cruise control cable was stuck under throttle"
- "alleged speed control cable was detached and held throttle open while driving. Ran off road."

- b. The requested photos of the accelerator cable liner migration and speed control cable damage are provided in Appendix L.
- c. A representative sample of field return parts were not available so we are providing photos in Appendix M.
- d. The accelerator cable liner migration condition was determined to be caused by variation in manufacturing of the cable assembly itself. There were no environmental contributing factors.

The engine cover interference condition only occurs after initial damage to the speed control cable and that may occur during improper engine service. A list of service procedures that involve removal of the speed control cable is provided in Appendix P in response to Request 22.

- e. The accelerator cable liner migration condition may prevent the throttle from returning to idle and could potentially elevate engine speed while driving. This is a progressive condition so the engine may, over time, increase, even to max throttle, until the issue is fixed. This assessment was made from lab testing and vehicle testing. Ford issued recall 04S25 to address this condition.

The engine cover interference condition may result in a stuck throttle when the accelerator pedal is fully or almost-fully depressed. This may be a progressive condition whereby initial damage to the cable caused by improper service techniques may create interference between the nylon cable cover and its conduit, impeding the motion of the cable and causing the cable to kink. Kinking, in turn, may result in the cable connector end contacting and lodging against the plastic engine cover. This assessment was based on an inspection of exemplar components, field incidents, and a Computer Aided Drafting (CAD) packaging study. Ford issued recall 12S37 to address this condition.

- f. Reports that may pertain to the accelerator cable liner migration subject are included in Appendix C. Ford voluntarily issued recall 04S25 in December 2004 to address this condition; therefore we are not providing a separate list of incidents.

Reports pertaining specifically to allegations of speed control cable contact with the engine cover are included in the database provided in Appendix C.

- g. Documents pertaining to accelerator cable liner migration (04S25) are provided in Appendices H and I. A summary of information pertaining to engine cover interference with damaged speed control cable evaluations is provided in Ford's response to Request 20 (d) and (e).

#### Request 19

State the number of subject components that Ford has sold that may be used in the subject vehicles by component name, part number (both service and engineering/production), model and model year of the vehicle in which it is used and month/year of the sale (including the cut-off date for sales, if applicable).

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-Mercury dealers. Ford has no means to determine how many of the parts were actually installed on vehicles, the vehicle model or model year on which a particular part was installed, the reason for any given installation, or the purchaser's intended use of the components sold.

Ford is providing the total number of Ford service replacement accelerator cables and speed control cables by part number (both service and engineering) and year of sale, where available, in Appendix K. Information pertaining to production and service usage for each part number, and supplier point of contact information, is included in Appendix P.

Request 20

The subject update includes the following statement:

*"REASON FOR THIS UPDATE*

*The purpose of this update is to inform dealers that updated illustrations and a warning have been added to the technical instructions (Attachment III) to help prevent damage to the speed control cable while performing the accelerator cable replacement procedure. In addition, warranty edits have been incorporated to prevent the payment of related damage claims for speed control cable replacement."*

Provide the following information regarding the subject recall update:

- a. A detailed description of the speed control cable damage that could result from performing the accelerator cable replacement procedure;
- b. A detailed description of the known or suspected actions by dealer repair technicians (or others) that Ford has identified as causing, or contributing to, speed control cable damage, including a description of the type and location of damage and its effect on speed control cable operation;
- c. A description of the "warranty edits" referenced in the statement above and their effect on warranty claim payments that may relate to the alleged defect, including the date the subject edits became effective;
- d. A chronology of all events from the start of the subject recall to the issuance of the update and since that relate in any way to the subject of speed control cable damage that may have resulted, in whole or in part, from completion of the subject recall repair procedure;
- e. All actions taken by Ford to assess the scope and frequency of potential damage to the speed control cable before and after issuing the subject update; and
- f. All actions taken by Ford to assess the potential failure modes and associated safety consequences that may result from the speed control cable damage before and after issuing the subject update.

Answer

- a. If the 04S25 recall service is performed correctly, no damage will result from the procedure. Of the over 386,000 vehicles that had the recall service completed, less than 1% alleged having involved any associated speed control cable damage. Damage to the speed control cable may result if the throttle body cam is rotated incorrectly by lifting up on the speed control cable or the speed control cable connector end, rather than lifting up on the cam itself, as shown in Ford's recall update communication. Use of the speed control cable to lift the cam may result in damage to the cable which can create interference between the nylon cable cover and its conduit, impeding the motion of the cable and causing the cable to kink.
- b. As stated in subpart (a), initial damage to the speed control cable can be caused by improper service. In addition to the actions identified above pertaining to the 04S25 program, there are other reasons why a cable may become damaged. Many service procedures require removal of the cable which could result in damage if performed improperly. Further, the subject vehicles are 9-12 years old and generally have accumulated high mileage and are likely to have had some type of service in the throttle body area. The list of service procedures that may require removal of the cable are listed in Appendix P in our response to Request 22. A vehicle's speed control system may still function normally with a damaged speed control cable.
- c. Warranty edits were included in the update to prevent damaged speed control cables from improperly being charged to the 04S25 recall program. The edits became effective upon issuance of the updated service communication.
- d. In Ford's search for documents pertaining to this subject (reference Ford's response to Request 15) Ford did not locate any documents pertaining to the reason for the subject recall update, as stated in Ford's October 2005 communication.

Individual accounts of the events prior to that update indicate that a technician from the Ford Management Lease Vehicle Service garage contacted product engineering personnel regarding the repair procedure. Engineering and FCSD personnel then attended a meeting at the garage where they reviewed the potential for damage to the speed control cable during the repair. Another individual indicated that personnel from FCSD, the Automotive Safety Office (ASO), and a technical writer attended a vehicle review to try to identify the potential causes of a damaged speed control cable. A bent or kinked speed control cable was not observed at that time. Nevertheless, because Ford had received claims to replace speed control cables that were damaged at the time of the recall service, Ford implemented the warranty edit mechanism as previously discussed.

- e. Ford did not identify any documents pertaining to actions taken to assess the scope and frequency of potential damage to the speed control cable prior to the update being published. The update was simply published to implement warranty edits that would prevent damaged cables from improperly being charged to the 04S25 recall program, and to advise technicians of the potential for speed control cable damage if improper repair procedures were used.

- f. Although Ford inspected a number of vehicles between 2006 and 2011 that involved some type of speed control cable allegation resulting in an accident, there was no clear recognition that these allegations may be related to the potential damage referenced in this updated service procedure communication.

In May 2006, Ford inspected a 2003 MY Escape that was the subject of a lawsuit in which various defect allegations relating to the accelerator and speed control systems were raised. At the time of Ford's review of the vehicle, the speed control cable and the throttle body assembly had been removed from the vehicle and were not made available to Ford for inspection. In December 2006, Ford was given the opportunity to inspect the throttle assembly and the speed control cable from that vehicle; however, the speed control cable and throttle body were not present in the vehicle. At that time Ford had become aware that the inspecting police officer had concluded the speed control cable on that vehicle had stuck on the engine cover, but Ford could not replicate the condition in informal testing of exemplar components, and did not determine the root cause of the incident. In June 2009, Ford had the opportunity to inspect a 2002 MY Escape involved in a July 2007, accident and found the speed control cable stuck on the engine cover. Ford conducted a data analysis in June 2009 that identified allegations of stuck/sticky throttle due to the accelerator cable and/or speed control cable on vehicles that had the recall completed. In May 2011, Ford had the opportunity to inspect a 2004 MY Escape involved in a November 2010, accident and found the speed control cable stuck on the engine cover. Yet there was no clear recognition that some of these allegations might be related to speed control cable damage resulting from improper repairs. In June 2012, Ford had the opportunity to inspect a 2004 MY Escape involved in a January 2012 accident and found the speed control cable stuck on the engine cover. Based on data analysis and component reviews conducted in June 2012, Ford initiated recall 12S37. Documents pertaining to the above analyses are provided in Appendix I.

#### Request 21

Provide copies of all communications to and from Mazda North American Operations (or Mazda Motor Corporation) regarding problems related to Ford Recall No. 04S25 and Mazda Recall No. 2704L before October 6, 2005 and communications with Mazda related to what became or was the subject recall update including potential for speed control cable assembly damage occurring during accelerator cable replacement.

#### Answer

Ford's search for requested information responsive to Request 15 included searches for communications to and from Mazda pertaining to this subject. Ford is providing any documents containing communications with Mazda that are responsive to this request in Appendix H and Appendix I.

#### Request 22

Identify all repair procedures in the subject vehicles that: (a) may involve removal or disturbance of the accelerator cable or speed control cable from the throttle body cam; or (b) Ford believes may result in damage to the accelerator or speed control cables and provide the following information about each:

- a. A copy of the repair procedure;

- b. Counts by subject recall applicability, model year, engine and claim year for all warranty claims (including extended warranty) related to the procedure/labor operation; and
- c. If the procedure involves a part replacement (e.g., throttle body), state the applicable part sales numbers by calendar year.

Answer

- a. Procedures that may involve removal or disturbance of the accelerator cable or speed control cable are listed in Appendix P. Each of these procedures is provided in the Workshop Manual for the 2002 Escape, which is provided on the DVD included with the response labeled Appendix O.
- b. Counts of Labor Operations procedures requested for base warranty and extended warranty claims are included in Appendix P.
- c. Service part sales numbers are provided in Appendix Q.

Request 23

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

- a. The causal or contributory factor(s);
- b. The failure mechanism(s);
- c. The failure mode(s);
- d. The risk to motor vehicle safety that it poses;
- e. What warnings, if any, the operator and the other persons both inside and outside the vehicle would have that the alleged defect was occurring or subject component was malfunctioning; and
- f. The reports included with this inquiry.

Answer

The agency's Information Request, and specifically the definition of its alleged defect, is extremely broad in its inclusion of multiple components and multiple conditions across the subject and peer 2001-2004 model year Escape vehicles, including:

- Speed control cable assembly failure or interference
- Accelerator cable assembly failure, and
- Failure of the throttle to return to idle for any cause

Ford has conducted analysis of reports responsive to this investigation as part of our response to this information request. Based on these analyses, Ford believes that the recall actions voluntarily taken in 2004 (04S25) to address an accelerator cable quality issue, and in 2012 (12S37) to address the potential for a damaged speed control cable to contact the engine cover, are appropriate and effective.

Assessment of Engine Cover Interference Allegations

Ford has determined that a failure mechanism exists in the subject vehicles that may arise from interference between the engine cover and a damaged speed control cable that may result in a stuck throttle when the accelerator pedal is fully or almost-fully depressed. The potential for this condition does not exist in the vehicle as designed or when proper service techniques are followed. This may be a progressive condition whereby initial damage to the cable may create interference between the nylon cable cover and its conduit, impeding the



motion of the cable and causing the cable to kink. Kinking, in turn, may result in the cable connector end contacting and lodging against the plastic engine cover.

Ford initially identified the potential for damage to speed control cables caused by improper service related to safety recall 04S25 and issued additional instructions to our dealers to avoid the improper procedure that induced damage into the speed control cable. At that time, we did not identify a potential engine cover interference condition and believed that the additional instructions addressed a minor service procedure issue. In fact, to date less than 1% of the over 386,000 vehicles now repaired have been involved in any alleged type of speed control cable damage.

Ford continually monitors the field performance of its vehicles to identify reports that would indicate a safety defect trend. NHTSA performs a similar function in monitoring TREAD Report data from manufacturers and Vehicle Owner Questionnaire reports from vehicle owners. As the agency is aware, it can be difficult to establish the cause for allegations of unwanted acceleration or stuck throttles. For example, Ford became aware of an allegation of a stuck throttle resulting in a fatal accident in 2005. The lawsuit complaint, which was provided to the agency in response to DI05-143 in May 2006, alleged several causes for the incident including:

- a) had a speed control system that could cause unintended acceleration;
- b) had defective cables, including the accelerator cable and the cruise control cable;
- c) had a speed control system that was improperly designed such that it could self-activate and/or fail to disengage upon command;
- d) had an accelerator cable liner capable of migrating out of the accelerator cable conduit, which prevents the throttle from returning to the idle position;
- e) had defects that caused the vehicle to accelerate on its own, creating an extremely hazardous condition;
- f) had defects which caused unexpected increased engine idle speed, thereby increasing stopping distances and resulting in crashes without warning;
- g) contained inherent defects that made it extremely difficult or impossible for vehicle operators to regain control;
- h) had a cruise control cable that was inadequately protected such that it could cause the mechanism to hang up on the engine cover;
- i) had inadequate and poorly designed cables, cable covering, and cable wires; and
- j) had no warning of the numerous defects that could cause the vehicle to accelerate on its own and lead to a collision.

Ford was provided an opportunity to observe the vehicle in May 2006, but was not able to conduct any vehicle evaluations. In fact, the throttle body and speed control cable had been removed from the vehicle and were not made available to Ford for review at that time. Ford was subsequently permitted to inspect the vehicle in December 2006, including the speed control cable and throttle body, which were out of the vehicle. Ford also subsequently became aware that the inspecting police officer had concluded that the speed control cable had stuck on the engine cover.

As Ford's response to this Information Request illustrates, reports on the topic of acceleration related issues are extremely varied and often provide little in technical details to help identify causes:

In a search of Ford's databases for reports specifically pertaining to speed control cable allegations on the subject vehicles, we found the speed control cable report rate is low (less

than 1%), especially considering the time in service for these vehicles that are up to 12 years old.

Review of the speed control cable reports provided in this response found that approximately 90% simply alleged inoperative speed control, and most of those state that the speed control cable was either "broken," was "disconnected" from the throttle body due to a worn connection, or was simply replaced without explanation. In our most recent analysis we found only 31 unique allegations of the speed control cable contacting the plastic engine cover and the throttle not returning to idle. These 31 allegations are from a population of over 546,000 vehicles, some of which have been on the road for up to 12 years. Of these, 24 make no mention of loss of control or inability to stop the vehicle; some mention that they put the vehicle into neutral or turned off the vehicle, for example, and then safely stopped the vehicle.

Identifying the condition related to safety recall 12S37 was complicated by several factors. The condition results from damage induced by improper service. Reports of improper service do not initially indicate a potential safety defect in the vehicle. In contrast, safety recall 04S25 identified a defective condition inherent in certain accelerator cables. Further, a kinked or damaged speed control cable does not typically pose a safety risk. The initial damage does not necessarily demonstrate the potential for engine cover interference. Because the development of the potential for the interference condition may be progressive over years in service, reports of a damaged or kinked speed control cable do not initially indicate an obvious safety risk. Finally, as discussed above, reports of acceleration related issues are ubiquitous and generally do not provide technical information to allow for the identification of a cause.

In deciding to conduct a safety recall and in responding to this Information Request, Ford is not making an assessment regarding the facts of any particular report or incident. While the effect of a stuck throttle may be ameliorated by driver action, such as braking the vehicle, placing the transmission in neutral, or turning off the ignition, Ford nevertheless initiated recall 12S37 to address this condition.

#### Assessment of Accelerator Cable Allegations

The agency also requested information pertaining to accelerator cable allegations to assess the adequacy and scope of recall 04S25. The agency stated in its Information Request that "we (NHTSA) have received 10 reports alleging ... symptoms in vehicles that consumers were notified were not part of the (04S25 accelerator cable) recall."

Based on our search of Ford's databases for reports specifically pertaining to accelerator cable allegations on vehicles not included in the 04S25 accelerator cable recall, Ford continues to believe that the scope of that recall was appropriate. None of the VOQ's on vehicles that were outside the scope of 04S25 indicate that their vehicle concern pertained to the cable liner condition that was the subject of the recall. A search of Ford's databases did not find allegations that would indicate any cable liner quality issue on vehicles outside the recall scope. In fact, only a few ambiguous, unsubstantiated reports that are unclear as to the specific nature of the complaint were found. Based on its evaluations at the time of the recall, and supported by this more recent review, Ford continues to believe that the scope of 04S25 was appropriate.

Based on Ford's review of the information provided in this response, the 04S25 remedy also appears to be appropriate and effective. The accelerator cable report rate for any cause on subject vehicles after the recall was completed is low (0.2%), especially considering these vehicles have been in service up to 12 years and that the recall was initiated nearly 8 years ago.

Of the accidents alleged to be caused by the accelerator cable on 2002-2004MY subject vehicles, 77% occurred before recall 04S25 was completed on their vehicle, and nearly every one of those customers mention having just received the 04S25 recall notification or having just learned of the recall. We believe this close timing is unlikely to be a coincidence and that many of these allegations are motivated by a desire for reimbursement, and are not necessarily related at all to the accelerator cable liner quality issue.

Similarly, Ford continues to receive reports of accidents that have occurred after the recall repair was completed in which the customers simply allege the accident was generically related to the recall repair without explanation. We again note that this is not uncommon or unexpected after the recall was announced on a population of over 400,000 vehicles. It is Ford's experience that such alleged incidents can have many causes, including driver error, or the allegations could simply be motivated by the desire for compensation.

#### Other reports of throttle not returning to idle

The agency has requested not only reports that specifically allege an accelerator cable or speed control cable failure, but also reports pertaining to a throttle not returning to idle when the accelerator pedal is released, for any cause. As the agency is aware, a throttle not completely returning to idle can occur for a wide variety of reasons on these and any modern vehicle. Ford's review identified reports pertaining to IAC valves, EGR valves, vacuum leaks, Differential Pressure Feedback (DPFE) sensors, and unspecified throttle body issues, just to name a few. Many of the category D1 reports that are not specific in their description likely pertain to a known stuck closed throttle condition, but are nevertheless provided in this response as ambiguous reports for the agency's review. These D1 reports appear to be largely insignificant, typically containing allegations such as "accelerator pedal sticks" with no other symptoms or consequences mentioned.

Because the agency's alleged defect includes failure of the throttle to return to idle when the accelerator pedal is released, the reports provided as part of this response also include allegations of speed control not disengaging when expected. Hundreds of these reports indicate that the amount of pedal travel required to disengage speed control is not what customers are accustomed to.

#### VOQs

Of the 73 VOQs provided by the agency in this request, 46 pertained to vehicles in the subject recall population where the report date was after the recall was completed. A review of related reports in Ford's databases for these vehicles found:

- Twelve were accelerator cable allegations, a low number considering 386,000 cables were installed as part of the subject recall on vehicles that are now up to 12 years old, as previously discussed
- Sixteen were speed control cable allegations (Ford has issued 12S37 to address the potential for speed control cable contact with the engine cover)
- One was found to pertain to the IAC valve
- One was found to pertain to throttle body freezing
- Sixteen that remain unknown despite a review of Ford's databases for corresponding information

Conclusion

Based on these analyses, Ford believes that the recall actions voluntarily taken in 2004 (04S25) to address an accelerator cable quality issue, and in 2012 (12S37) to address the potential for a damaged speed control cable to contact the engine cover, are appropriate and effective.

###