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October 14, 2013

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: PE13-031:NVS-213krh

The Ford Motor Company (Ford) response to requests one through eight of the agency's September 16, 2013 letter is attached.

Ford requested a two week extension of the due date for requests nine through eleven on October 7, 2013 in an e-mail to Mr. Jeff Quandt of the agency. As of the date of this request, Ford understands that the agency has not reviewed Ford's extension request because of the ongoing government furlough.

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

Sincerely,


for Steven M. Kenner

Attachment

FORD MOTOR COMPANY (FORD) RESPONSE TO PE13-031

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 September 17, 2013. Ford has searched within the following offices for responsive documents: Sustainability, Environment and Safety Engineering; Ford Customer Service Division; Marketing and Sales Operations; Quality; Global Core Engineering; Office of the General Counsel; Vehicle Operations; North American Product Development; and Ford of Europe Product Development.

Request 1

State, by model, engine and model year, the number of MY 2012 through 2013 Ford Focus Electric 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. Model;
- c. Electric motor part number and rated battery pack energy;

- d. Model Year;
- e. Date of manufacture;
- f. Date warranty coverage commenced.; and
- g. The State in the United States or federalized territory, where the vehicle was originally sold or leased (or delivered for sale or lease).

Provide the table in Microsoft Access 2003, 2007, or a compatible format, entitled "PE13_031_PRODUCTION DATA."

Answer

Ford records indicate that the number of Focus Electric vehicles manufactured for sale or lease in the United States, (the 50 states and the District of Columbia) protectorates, and federalized territories (American Samoa, Guam, Northern Mariana Islands, Puerto Rico, and Virgin Islands) is shown in the table below:

Model	2012 MY	2013 MY
Focus Electric	715	1,406

For subpart "c", all subject vehicles are equipped with the same electronic motor base part number 14B280 MTR ASY - TRCT (IMC) and all of the vehicles have a rated battery pack energy of 23.8 kw-hours. The requested data for subparts "a, b, d-g" for each subject vehicle is provided in Appendix A.

Request 2

State, by model and model year, the number of MY 2012 through 2013 Ford Focus Electric vehicles Ford has manufactured for sale or lease in the United States and federalized territories for which Ford has sold an extended service plan. For vehicles with more than one extended service plan, list the vehicle separately for each plan. Separately, for each vehicle, state the following:

- a. Vehicle Identification number (VIN);
- b. Model;
- c. Model Year;
- d. Name of batter, powertrain or chassis extended service plan;
- e. Mileage at which the extended service plan expires; and
- f. Number of months from the warranty start date at which the extended service plan expires.

Provide this information in Microsoft Access 2003 or 2007, or a compatible format, entitled "PE13_031_SERVICE PLAN DATA."

Answer

Ford records indicate that the number of Focus Electric vehicles manufactured for sale or lease in the United States, (the 50 states and the District of Columbia) protectorates, and federalized territories (American Samoa, Guam, Northern Mariana Islands, Puerto Rico, and Virgin Islands) for which Ford has sold an extended service plan is shown in the table below:

Model	2012 MY	2013 MY
Focus Electric	72	72

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

Request 3

State, by model, engine and model year, 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 MY 2012 through 2013 Ford Focus Electric 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 C.

The following categorizations were used in the review of reports located in each of these searches:

Category	Allegation
A	Electric Powertrain - Stalls - Loss of Power
B	Message Center "Stop Safety Now" - no indication of stall

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 FMC360 database, as described in Appendix C, 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 that allege "EV propulsion system failure causing vehicle stall or loss of power" in a subject vehicle are provided in the FMC360 portion of the database contained in Appendix D. 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 C, 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 E.

Field Reports: Records identified in a search of the Common Quality Indicator System (CQIS) database, as described in Appendix C, 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 that allege "EV propulsion system failure causing vehicle stall or loss of power" in a subject vehicle are provided in the CQIS portion of the database contained in Appendix D. 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 D but are not included in the field report count.

VOQ Data: This information request had an attachment that included 30 Vehicle Owner Questionnaires (VOQs). Ford made inquiries of its FMC360 database for customer contacts, and its CQIS database for field reports regarding the vehicles identified on the VOQs. Eighteen of the VOQs were found to be duplication of reports received by Ford. 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 any reports corresponding to these alleged incidents are provided in the FMC360, CQIS, and AWS portions of the database provided in Appendix D.

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.

We are providing the requested detailed information, where available, on the responsive lawsuits and claims in Appendix D in the Legal Claim/Lawsuits tab. To the extent available, copies of complaints, first notices, or FMC360 reports relating to matters shown on the log are provided. With regard to these lawsuits and claims, Ford has not undertaken to contact outside law firms to obtain additional documentation.

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 or fleet name (and fleet contact person), address, and telephone number;
- d. Vehicle's VIN;
- e. Vehicle's 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 2003 or 2007, or a compatible format, entitled "PE13_031_REQUEST NUMBER FOUR DATA."..

Answer

Ford is providing owner and field reports in the database contained in Appendix D 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 D in the database.

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 D in response to Request 3. To the extent information sought in Request 5 is available, is available for owner and field reports, it is provided in the database. To the extent information sought in Request 5 is available for lawsuits and claims, it is provided in Appendix D in the Legal Claim/Lawsuits tab.

Request 6

State, by model and model year, total counts 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 MY 2012 through 2013 Ford Focus Electric 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. Whether a claim for towing was made within five days of the claim date;
- f. Vehicle mileage at time of repair;
- g. Repairing dealer's or facility's name, telephone number, city and state or ZIP code;
- h. Labor operation number and description;
- i. Problem code and description;
- j. Replacement part number(s);
- k. Replacement part supplier and description;
- l. Concern stated by customer;
- m. Cause and Correction stated by dealer/technician; and
- n. Additional comments, if any, by dealer/technician relating to claim and/or repair.

Provide this information in Microsoft Access 2003 or 2007, or a compatible format, entitled "PE13_031_WARRANTY DATA."

Answer

Records identified in a search of the AWS database, as described in Appendix C, 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 that allege "EV propulsion system failure causing vehicle stall or loss of power" in a subject vehicle are provided in the AWS portion of the database contained in Appendix D. 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 D but are not included in the report count.

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 FMC360 reports identified above in response to Request 3. Such claims that were honored are included in the warranty data provided.

Request 7

Describe in detail the search criteria used by Ford to identify the claims identified in response to Request No. 6, 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).

Answer

Detailed descriptions of the search criteria, including all pertinent parameters, used to identify the claims provided in response to Request 6 are described in Appendix C.

For 2012-2013 model year Focus Electric 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.

Note: Lithium-Ion Battery Gradual Capacity Loss

The Lithium-ion battery (EV battery) will experience gradual capacity loss with time and use (similar to all lithium-ion batteries), which is considered normal wear and tear. Loss of battery capacity due to or resulting from gradual capacity loss is NOT covered under the New Vehicle Limited Warranty.

In addition to the Bumper-to-Bumper warranty for the 2012 model year Focus Electric, the following components are covered for eight years or 100,000 miles (whichever occurs first): battery packs; high-voltage battery conditioning pump, hoses, and valves; and, charger and charge cord.

In addition to the Bumper-to-Bumper warranty for the 2013 model year Focus Electric, the following components are covered for eight years or 100,000 miles (whichever occurs first): high-voltage battery packs, high voltage charger, DC/DC convertor, Electric Drive Module Assembly (includes electric motor and gearbox), transmission range and charge cord.

Request 8

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 "EV propulsion system failure causing vehicle stall or loss of power", 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 C.

OASIS Messages: Ford has identified one TSB that may relate to the agency's request and is providing a copy in Appendix F.

Internal Service Messages: Ford has identified 0 ISMs that may relate to the agency's request.

Field Review Committee: Ford has identified one field service action communication that may relate to the agency's request and is providing a copy in Appendix G.

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