



Emily Frascaroli, Counsel
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World Headquarters, Suite 407-A6
1 American Road
Dearborn, Michigan 48126

December 5, 2014

O. Kevin Vincent
Office of the Chief Counsel (NC-111)
National Highway Traffic Safety Administration
West Building W41-326
1200 New Jersey Avenue, SE,
Washington, DC 20590

Re: Response to General Order Re. PE 14-046 Air Bag Inflator Rupture

Dear Mr. Vincent:

Ford Motor Company's (Ford) response to your General Order addressed to Steve Kenner dated November 18, 2014, concerning Takata Air Bag Inflator Ruptures is attached.

Ford notes that some of the information being produced pursuant to this inquiry may contain personal information such as employee names and titles. 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).

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

Sincerely,

A handwritten signature in black ink, appearing to read "Emily Frascaroli", with a long horizontal flourish extending to the right.

Emily Frascaroli

ATTACHMENT

FORD RESPONSE TO GENERAL ORDER Re. PE 14-046

Request 1

File a report that describes, in detail, all completed, ongoing or planned testing of Takata inflators outside of the HAH Region. At a minimum, your report must include, but should not be limited to, the following:

- a. All documents regarding or relating to the testing contained in your report;
- b. The location of the testing; the dates of the testing; whether the testing is completed, in progress, or planned; anticipated date of completion of testing; the nature and objective of the testing; and, testing protocols;
- c. A roster of all vehicles where the inflator was tested which includes: the model; model year; vehicle build date; VIN; the vehicle's registration history, by location; inflator serial number; inflator type; dealership location with zip code where the inflator unit was returned; whether any deaths, injuries or claims are associated with the inflator in the vehicle; and, product specifications for the air bag and inflator modules in each vehicle.
- d. If testing of inflators has been completed, describe in detail the results of the testing and the conclusions you have reached based upon the test results. If your conclusion is that a safety defect does not exist in inflators outside of the HAH Region, describe in detail the basis for that conclusion and when the decision was made and by whom. Provide a copy of an documents to or from any person(s) related to the conclusion that no safety defect exists in inflators outside of the HAH Region.
- e. Sub-part (e) is directed to BMW, Chrysler, Ford, GM, Honda, Mazda, Mitsubishi, Nissan, Subaru and Toyota: State in your report whether or not Takata has performed testing of inflators used in your vehicles outside of the HAH Region. If so, describe in detail what Takata has communicated to you about the testing and/or test results. Produce all documents related to Takata's testing, test results and your communications, internal and external, related to the testing. State whether you have requested additional information from Takata concerning its testing of inflators outside of the HAH Region which you believe would assist in your determination of whether a defect exists. Identify and describe any information, documents or categories of information and documents that you reasonably believe that Takata has or reasonably should have concerning inflators or testing of inflators used in your vehicles that Takata has not provided you and which

you believe would assist you in testing inflators to determine whether a safety defect exists in inflators outside of the HAH Region.

- f. Provide the name, title and complete contact information for each and every manager or supervisor (at all levels of management or supervisory responsibility) involved in your investigation and decision-making process concerning rupturing air bag inflators manufactured, in whole or in part, by Takata.
- g. Provide the name, title and complete contact information for each and every person who prepared and provided input and/or data included in the report contained in Request No.1, including but not limited to inside or outside counsel, accountants, engineers, employees and other professionals.

RESPONSE

As the agency knows, Ford agreed in June 2014 to the agency's request to initiate a field service action to obtain field parts from the original HAH region (Florida, Hawaii, Puerto Rico, and U.S. Virgin Islands) in order to support study by Takata and NHTSA. NHTSA identified that the airbag inflator issue seems to be related to hot weather and high absolute humidity, thus Ford's focus has been on obtaining parts from that region. This process involves replacing air bag inflators from the vehicle population from the field service action and sending those inflators to Takata for testing at their facilities. Relative to other manufacturers, fewer Ford parts have been tested from within the HAH region by Takata; however, we have not identified any Ford passenger airbag inflator ruptures in the field or in testing from any region. While we are aware of one report of an air bag inflator rupture on a driver's airbag in a 2007 Ford Mustang in North Carolina, Ford's understanding is that the parts have been scrapped with the exception of one metal fragment that is in NHTSA's possession. We are working with NHTSA to arrange a technical analysis of this metal fragment. At this point, Ford has not had the opportunity to inspect this part other than through photos. Additionally, Ford has only been provided aggregate test data and not specific test data or information on any field reports on non-Ford vehicles, and inflators from other vehicle manufacturers that have ruptured have not been made available to Ford's technical team to review those components. Without this information, Ford is not currently able to assess whether the Mustang incident is the same or similar to other field incidents or lab ruptures that have been reported.

Ford has collected 6 inflators from salvaged vehicles in Michigan . The status of those parts and testing is listed in the excel spreadsheet included as Appendix C. Ford is developing a more comprehensive test plan designed to understand the effect of humidity and heat on inflator performance.

Ford supports Toyota's proposal for a joint initiative to test Takata airbags among the automakers. We plan to join the proposed industry wide effort to investigate

and develop solutions to address this critical issue. We look forward to discussing next steps with NHTSA and other automakers.

Ford's efforts in this regard are ongoing, and we will supplement our response to this request as more detailed plans and results are available.

Ford is not aware of any responsive documents to any part of this request that are no longer within its possession, custody, or control.

- a. The documents regarding or relating to the testing outlined in the response are included in Appendix B.
- b. Ford refers to Appendix C.
- c. Ford refers to Appendix C.
- d. Ford refers to Appendix C.
- e. Ford is not aware that Takata has performed any testing of inflators obtained from Ford vehicles from outside of the HAH Region.

Ford has reviewed data with Takata on testing of parts from non-Ford vehicles that may have come from outside the HAH region. Ford has requested the specific test results and other documentation concerning this testing be provided, but thus far, Ford has only received non-specific data in aggregate form. Ford has also reviewed data with Takata on testing of generate at various levels of humidity. Ford has requested the specific test results and other documentation concerning this testing be provided to Ford, but thus far we have not received it. Takata has also discussed performance of their inflator designs at various humidity levels. This data may be important to understand differences in performance between vehicles due to inflator differences. Ford has requested the specific test results and other documentation concerning this testing be provided to Ford, but thus far we have not received it.

- f. There are many functional areas involved in the investigation of the safety of Takata airbags and identifying each and every each and every manager or supervisor involved in the investigation and decision-making process is nearly impossible. However, Ford has made a reasonable effort to identify those individuals, including members of the core task force assigned to investigate this issue, that have participated in the planning and decision-making process of testing of Takata inflators outside of the HAH Region. Those individuals are:
 - i. [REDACTED] Design and Release Supervisor & Global Technical Specialist, Steering Wheel, Driver Airbag and Inflator Design
 - ii. [REDACTED] Manager, Car Restraints
 - iii. [REDACTED] Chief Engineer, Seat Systems & Core Engineering

- iv. [REDACTED] Chief Engineer, Seat Systems & Core Engineering
- v. [REDACTED] Director, Global Interior Engineering
- vi. [REDACTED] Vice President, Vehicle Component and System Engineering
- vii. [REDACTED] Global Director, Automotive Safety Office, Sustainability, Environment & Safety Engineering
- viii. [REDACTED] Assistant Director, Automotive Safety Office, Sustainability, Environment & Safety Engineering
- ix. [REDACTED] Manager, External Investigations, Automotive Safety Office, Sustainability, Environment & Safety Engineering

Ford requests that any contact by NHTSA's Chief Counsel to any Ford employee be directed to Emily Frascaroli of Ford's Office of the General Counsel:

[REDACTED]
Office of the General Counsel
Ford Motor Company
World Headquarters, Suite 407-A6
1 American Road
Dearborn, Michigan 48126
[REDACTED]
[REDACTED]

- g. These are the responses of Ford Motor Company, which have been prepared by and under the supervision of Ford's attorneys and with the assistance of various Ford employees. Ford's responses are compiled from a variety of sources, and no one person, or persons, within Ford can be identified as having sole responsibility for any particular aspect of each response. However, the following people prepared or provided input and/or data included in the report:
- i. [REDACTED] Design and Release Supervisor & Global Technical Specialist, Steering Wheel, Driver Airbag and Inflator Design
 - ii. [REDACTED] Manager, Car Restraints
 - iii. [REDACTED] Chief Engineer, Seat Systems & Core Engineering
 - iv. [REDACTED] Chief Engineer, Seat Systems & Core Engineering
 - v. [REDACTED] Director, Global Interior Engineering
 - vi. [REDACTED] Vice President, Vehicle Component and System Engineering
 - vii. [REDACTED] Global Director, Automotive Safety Office, Sustainability, Environment & Safety Engineering
 - viii. [REDACTED] Assistant Director, Automotive Safety Office, Sustainability, Environment & Safety Engineering
 - ix. [REDACTED] Manager, External Investigations, Automotive Safety Office, Sustainability, Environment & Safety Engineering
 - x. [REDACTED] Restraints Engineer, Car Restraints
 - xi. [REDACTED] Product Design Engineer, Car Restraints

- xii. [REDACTED] Senior Research Engineer, External Investigations,
Automotive Safety Office, Sustainability, Environment & Safety
Engineering
- xiii. [REDACTED] Critical Concern Manager, Vehicle Engineering
- xiv. [REDACTED] Chief Technical Officer and Principal Engineer,
Exponent, Failure Analysis Associates
- xv. [REDACTED] Managing Counsel, Office of the General Counsel
- xvi. [REDACTED] Counsel, Office of the General Counsel

Ford requests that any contact by NHTSA's Chief Counsel to any Ford employee be directed to Emily Frascaroli of Ford's Office of the General Counsel:

[REDACTED]
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Ford Motor Company
World Headquarters, Suite 407-A6
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[REDACTED]

Appendix A

AFFIDAVIT OF ROBERT BROWN

I declare under penalty of perjury that I have undertaken and directed an inquiry reasonably calculated to assure that the answers and production of documents are complete and correct, that I have caused the documents of Ford Motor Company to be searched diligently for information and documents responsive to this Special Order and produced them to NHTSA, and that, to the best of my knowledge, the answers to the inquiries provided to NHTSA respond completely and correctly to this Special Order.

Executed on December 5, 2014 at Dearborn, MI.

A handwritten signature in blue ink, reading "Robert Brown", is written over a horizontal line.

Robert Brown
Vice President
Sustainability, Environment & Safety Engineering
Ford Motor Company