



OFFICE OF DEFECTS INVESTIGATION
2014 08 26 11 49 19 ER

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August 22, 2014

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

Dear Mr. Borris:

Subject: EA14-002/NVS-212eer

The Ford Motor Company (Ford) response to the Agency's July 25, 2014, letter requesting certain information concerning 2011 through 2014 model year Ford Explorer, Edge, and Escape vehicles is attached. Ford understands that there is no alleged defect with respect to any of its vehicles and is providing this information as part of the Agency's investigation of another manufacturer's vehicles.

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 EA14-002

Ford's response to this Engineering Analysis peer vehicle information request was prepared pursuant to a diligent search for the information requested. We have made every effort to provide thorough and accurate information, and we would be pleased to meet with Agency personnel to discuss any aspect of this peer vehicle information request.

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, as more fully described in this response. 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 25, 2014, the date of your inquiry. Ford has searched within the following offices for responsive documents: Ford Customer Service Division, Office of the General Counsel, North American Product Development.

In an August 20, 2014 telephone conversation, Emily Reichard of the Agency informed Ford personnel that only panoramic sunroof assembly installation drawings are requested for subpart "o".

Request 1

State, by model and model year, the number of peer vehicles Ford has manufactured for sale or lease in the United States. Separately, for each 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. Date warranty coverage commenced.; and
- g. 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 2010, or a compatible format, entitled "PRODUCTION DATA."

Answer

Ford records indicate that the approximate total number of subject peer vehicles equipped with a panoramic sunroof system sold in the United States (the 50 states and the District of Columbia) and its protectorates and territories (American Samoa, Guam, Northern Mariana Islands, Puerto Rico, and Virgin Islands) is 563,000.

An optional panoramic sunroof was not available on the 2011 through 2012 model year Ford Escape. The number of subject peer vehicles sold in the United States by model and model year is shown below:

Model	2011 MY	2012 MY	2013 MY	2014 MY
Ford Explorer	34,833	31,826	80,063	73,353
Ford Edge	58,635	31,534	83,502	15,052
Ford Escape	N/A	N/A	91,910	62,241

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

Request 2

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

- a. Consumer complaints, including those from fleet operators;
- b. Field reports, including dealer field reports;
- c. Reports involving a crash, injury, or fatality;
- d. Property damage claims; and
- 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 "f," 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 Agency's request, 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, the Fleet Test Database systems, and the criteria used to search each of these are provided in Appendix B.

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

Category	Allegation
A1	Panoramic Sunroof Glass Breakage – Vehicle in Motion
A2	Panoramic Sunroof Glass Breakage – Vehicle Not in Motion
A3	Panoramic Sunroof Glass Breakage – Vehicle Motion Unknown

Owner Reports: Records identified in a search of the FMC360 database, as described in Appendix B, were reviewed for relevance and categorized in accordance with the categories described above. The number and copies of relevant owner reports identified in this search that may relate to the Agency's request are provided in the FMC360 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 has not identified any responsive legal contacts that relate to this request.

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 categorized in accordance with the categories described above. The number and copies of relevant field reports identified in this search that may relate to the Agency's request are provided in the CQIS portion of the database contained in Appendix C on the enclosed CD. 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 report count above.

Crash/Injury Incident Claims: Ford has not identified any crashes or injuries that relate to this request.

Claims, Lawsuits, and Arbitrations: For purposes of identifying incidents that may relate to this request, 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 categorized in accordance with the categories described above.

We are providing the requested detailed information, where available, on the responsive 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 FMC360 reports relating to matters shown on the log are provided in Appendix D. With regard to these lawsuits and claims, Ford has not undertaken to contact outside law firms to obtain additional documentation.

Request 3

Separately, for each item (complaint, report, claim, notice, or matter) within the scope of your response to Request No. 2, state the following information:

- a. Ford's file number or other identifier used;
- b. The category of the item, as identified in Request No. 2 (i.e., consumer complaint, field report, etc.);
- c. Vehicle owner or fleet name (and fleet contact person), address, and telephone number;
- d. Vehicle's VIN;
- e. Vehicle's make, model and model year;
- f. Vehicle's mileage at time of incident;
- g. Incident date;
- h. Report or claim date;
- i. Whether the vehicle was occupied when the incident occurred;
- j. Whether the vehicle was in motion when the incident occurred;
- k. Whether a crash is alleged;
- l. Whether property damage is alleged;
- m. Number of alleged injuries, if any; and
- n. Number of alleged fatalities, if any.

Provide this information in Microsoft Access 2010, or a compatible format, entitled "REQUEST NUMBER TWO DATA."

Answer

Ford is providing owner and field reports in the database contained in Appendix C in response to Request 2. To the extent information sought in Request 3 is available for owner and field reports, it is provided in the database. To the extent information sought in Request 3 is available for lawsuits and claims, it is provided in the Log of Lawsuits and Claims in Appendix C in the Legal Claim/Lawsuits tab.

Request 4

Produce copies of all documents related to each item within the scope of Request No. 2 that alleges a crash, injury, or fatality occurred. (Also include all documents related to any incident in which Ford conducted a field assessment of the incident vehicle, including all photographs.) Organize the documents separately by category (i.e., consumer complaints, field reports, etc.) and describe the method Ford used for organizing the documents. Describe in detail the search methods and search criteria used by Ford to identify the items in response to Request No. 2.

Answer

Ford is providing owner and field reports in the database contained in Appendix C in response to Request 2. Copies of complaints, first notices, or MORS reports relating to matters shown on the Log of Lawsuits and Claims provided in Appendix C in the Legal Claim/Lawsuits tab are provided in Appendix D. To the extent information sought in Request 4 is available, it is provided in the referenced appendices.

Request 5

State, by model and model year, a total count for all of the following categories of claims, collectively, that have been paid by Ford to date that relate to, or may relate to, the alleged defect in the subject 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 reformation:

- a. Ford's claim number;
- b. Vehicle owner or fleet name (and fleet contact person) and telephone number;
- c. VIN;
- d. Repair date;
- e. Vehicle mileage at time of repair,
- f. Repairing dealer's or facility's name, telephone number, city and state or ZIP code;
- g. Labor operation number;
- h. Problem code;
- i. Replacement part number(s) and description(s);
- j. Whether the vehicle was occupied when the incident occurred;
- k. Whether the vehicle was in motion when the incident occurred;
- 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 2010, or a compatible format, entitled "WARRANTY DATA."

Answer

Records identified in a search of the AWS database, as described in Appendix B, were reviewed for relevance and categorized in accordance with the categories described in the response to Request 2. The number and copies of relevant warranty claims identified in this search that may relate to the Agency's request 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 this subject that were not honored, if any, would be included in the FMC360 reports identified above in response to Request 2. Such claims that were honored are included in the warranty data provided.

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

Request 6

Describe in detail the search criteria used by Ford to identify the claims identified in response to Request 5, including the labor operations, problem codes, part numbers and any other pertinent parameters used.

Answer

Detailed descriptions of the search criteria, including all pertinent parameters, used to identify the claims provided in response to Request 5 are described in Appendix B.

Request 7

For each model, model year and panoramic sunroof system design manufactured on the subject peer vehicles, identify the part number, supplier name and a complete street address, contact name, and telephone number.

Answer

Ford is providing the requested information in Appendix E.

Request 8

For each panoramic sunroof system utilized in the subject peer vehicles, provide the following information:

- a. Marketing or Common item name;
- b. Movable or Fixed glass panel system;
- c. Single or multiple panel design (state no. of panels);
- d. Type of movable glass panel deployment design (i.e., Slide-in-Roof; Tilted and Slide over roof; Tilted, Slide and Stacked (for sectioned design), etc.);
- e. Sunshade type (manual or automatic, 1 or 2-piece);
- f. Location of glass panel(s) (i.e., "over 1st-row occupants", "over 2nd-row occupants", etc.);
- g. Size of panel(s) (length x width in centimeters);
- h. Thickness of glass panel(s) (millimeters);
- i. Weight of glass panel(s) (kilograms);
- j. Type of glass used as classified in ANSI/SAE Z26.1 (i.e. laminated tempered, tempered-laminated, etc.);
- k. Certified to ANSI/SAE Z26.1, Item ¾ Glazing Material Standard (specify all applicable Table 1 Tests);
- l. Provide any impact test results per ANSI/SAE Z26.1 Test No. 6-14 or per other standards if available;
- m. ANSI/SAE Z26.1 certification marking (i.e. AS1, AS2, etc.) if any;
- n. Explain the reasons for selecting the type, thickness and other relevant aspects of the glass used in the subject component in comparison with other types, thickness, and other relevant aspects of glass, which were considered or which could have been used.
- o. Engineering drawings of the panoramic sunroof system, including a depiction and/or description of how it is assembled in the subject vehicle.

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 providing the requested information for subparts "a" through "n" in Appendix F.

For subpart "l," Ford is providing component impact test results for Explorer in Appendix G with a request for confidentiality under separate cover to the Agency's Office of the Chief Counsel pursuant to 49 CFR Part 512.

For subpart "o," Ford is providing component installation drawings in Appendix G with a request for confidentiality under separate cover to the Agency's Office of the Chief Counsel pursuant to 49 CFR Part 512.

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2011-2014 Ford Explorer, Edge, and Escape Spontaneous Panoramic Sunroof Shattering

OWNER REPORTS

As the agency is aware, within FCSD's North American Customer Service Operations, there is a Customer Relationship Center (CRC) that is responsible for facilitating communication between customers, dealerships and Ford Motor Company. Among other things, the CRC handles telephonic, electronic, and written inquiries, suggestions, informational requests, and concerns ("contacts") from Ford and Lincoln-Mercury vehicle owners about their vehicles or sales and service experience. The contacts are handled by CRC customer service representatives who enter a summary of the customer contact into a database known as FMC360. Certain contacts, such as letters from customers, are entered into the FMC360 database.

The CRC assigns to each vehicle-related contact report a "symptom code" or category that generally characterizes the nature of the customer contact or vehicle concern, as described by the owner. The CRC does not undertake to confirm the accuracy of the description provided by the owner; they simply record what is reported. Therefore, given the complexity of the modern motor vehicle, it is Ford's experience that a significant percentage of owner contacts do not contain sufficient information to make a technical assessment of the condition of the vehicle or the cause of the event reported. Accordingly, although FMC360 contact reports may be useful in identifying potential problems and trends, the records are not the empirical equivalent of confirmed incidents and/or dealership's diagnosis. In the interest of responding promptly to this inquiry, Ford has not undertaken to gather the electronic images related to these contacts because of the largely duplicative nature of the information contained in the images, as well as the time and the burden associated with locating and producing those documents. The pertinent information related to those contacts generally would be included in the contact reports obtained from the FMC360 system. To the extent that those documents exist, they are characterized in the comments of FMC360 contact reports. Upon request, Ford will attempt to locate any specific items that are of interest to the agency.

In responding to this information request, Ford electronically searched FMC360 using the following criteria:

Model Year: 2011 – 2014 for the Ford Explorer and Edge Vehicles
2013 – 2014 for the Ford Escape

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

Date Parameters: Ford Explorer and Edge - January 1, 2010 and July 25, 2014 (the date of this inquiry)
Ford Escape_– January 1, 2012 and July 25, 2014 (the date of this inquiry)

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

FMC360 Symptom Code(s):

Symptom Category	Symptom Code	Symptom Description
Lighting/Glass/Vision	7715	Fixed Glass Roof
Lighting/Glass/Vision	7716	Sun/Moon Roof

FMC360 Reason Code(s):

FMC360 Legal Search Codes			
Level 1	Level 2	Level 3	Level 4
Dealer-Vehicle Concern	Legal		
Feedback	Product	Negative	Vehicle Safety/Quality
Vehicle Concern	Legal		

LEGAL CONTACTS

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

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

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

The claims, known as "Legal Contacts" are entered into the FMC360 database that the CRC uses to enter other customer communications. When a customer contact is designated as a Legal Contact, it is so indicated near the top of the contact report.

FIELD REPORTS

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

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

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

Model Year: 2011 – 2014 for the Ford Explorer and Edge Vehicles
2013 – 2014 for the Ford Escape

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

Date Parameters: Ford Explorer and Edge - January 1, 2010 and July 25, 2014 (the date of this inquiry)
Ford Escape_– January 1, 2012 and July 25, 2014 (the date of this inquiry)

Symptom Code(s):

Symptom Category	Symptom Code	Symptom Description
Lighting/Glass/Vision	7715	Fixed Glass Roof
Lighting/Glass/Vision	7716	Sun/Moon Roof

WARRANTY

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

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

Model Year: 2011 – 2014 for the Ford Explorer and Edge Vehicles
2013 – 2014 for the Ford Escape

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

Date Parameters: Ford Explorer and Edge - January 1, 2010 and July 25, 2014 (the date of this inquiry)
Ford Escape_– January 1, 2012 and July 25, 2014 (the date of this inquiry)

Base Part Number(s): 78500A18

Customer Concern Code(s):

CCC	Description
G02	GLASS BROKEN/CHIPPED/CRACKED/DISTORTED

EA14-002

FORD

8/22/2014

APPENDIX E

Appendix E - Panoramic Sunroof Assembly Information - Request 7

			(a)	(b)	(c)	(d)	(e)
Make	Model	Model Year	Part Numbers/Description	Supplier Name	Address	Contact Name	Phone Number
Ford	Explorer	2011	Front Glass Panel - BB53-78500A18-A Rear Glass Panel - BB53-78500A18-B	Inalfa Roof Systems	1270 Pacific Drive Auburn Hills, MI 48326 USA	Steve Schornak	248-494-3336
		2012					
		2013					
		2014					
Ford	Edge	2011	Front Glass Panel - BT43-18500A18-A Rear Glass Panel - 8T43-18500A18-B	Webasto Roof Systems	1757 Northfield Drive Rochester Hills, Michigan, 48309	Tom Mack	248-789-0583
		2012					
		2013					
		2014					
Ford	Escape	2011	No Panoramic Sunroof Option Available	N/A	N/A	N/A	N/A
		2012					
		2013	Front Glass Panel - CJ54-78500A18-A Rear Glass Panel - CJ54-78500A18-B	Inalfa Roof Systems	1270 Pacific Drive Auburn Hills, MI 48326 USA	Steve Schornak	248-494-3336
		2014					