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September 2, 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

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The data discs provided in Ford's August 22, 2014 response to the Agency's July 25, 2014 information request inadvertently did not include field reports for the 2013 through 2014 model year Ford Escape vehicles. Ford is providing two corrected data discs containing the amended version of Ford's submission. Please discard the data discs dated August 22, 2014.

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

Sincerely,

Steven M. Kenner

Attachment

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
ĺ	Lighting/Glass/Vision	7715	Fixed Glass Roof
ſ	Lighting/Glass/Vision	7716	Sun/Moon Roof

FMC360 Reason Code(s):

FMC360 Legal Search Code	C360 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.

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Subject Vehicle: Ford Explorer, Edge, and Escape vehicles manufactured for sale or lease

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<u>Date Parameters</u>: 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.

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this inquiry)

Ford Escape – January 1, 2012 and July 25, 2014 (the date of this

inquiry)

Base Part Number(s): 78500A18

<u>Customer Concern Code(s)</u>:

CCC	Description
G02	GLASS BROKEN/CHIPPED/CRACKED/DISTORTED