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November 5, 2014

Mr. Frank S. Borris, Director  
Office of Defects Investigation  
1200 New Jersey Avenue SE, Room W45-302  
Washington, DC 20590

Dear Mr. Borris:

Subject: Ford Motor Company Takata Inflator Recall

Please find Ford Motor Company's (Ford's) response to Mr. David J. Friedman's, Deputy Administrator, letter dated October 29, 2014. Ford is absolutely committed to the safety of our customers and to producing and selling safe vehicles. As of today, neither Ford, NHTSA nor Takata is aware of any reports of this airbag inflator issue on any Ford vehicles.

#### Request 1

The steps that you will take to (a) expedite Takata's production of replacement air bags; (b) expand the supply of replacement air bags by obtaining replacement air bags from other suppliers; (c) accelerate distribution of replacement air bag to repair facilities; and (d) urge and incentivize your dealers to increase the number of vehicles repaired.

#### Answer

- (a) As the Agency is aware, the supply of replacement Takata inflators is proportioned by the percentage of affected production by each OEM. Ford is dependent on Takata's ability to supply parts on an expedited basis. We are continuing to work closely with Takata to identify opportunities to improve the timing of replacement part availability.
- (b) The air bag inflators need to be developed for each specific vehicle application. While we have had discussions with alternative suppliers, they will need to develop, build, test, and validate inflators to work in Ford's specific vehicle applications.
- (c) As we have discussed with the Agency, there is a limited supply of replacement air bag inflators from Takata. Ford is expediting service parts to the affected regions as soon as they are received from Takata. We are sending Owner Letters as sufficient quantities are

available to meet initial demands of dealers and customers. It is important that our dealers are able to address customer demand for vehicle repairs as soon as letters are sent.

- (d) The Ford program launched last week. If there is a lag in customer demand, Ford will encourage customers to bring their vehicles to dealers when part supply exceeds owner demand. As the agency is aware, service part supply is currently limited.

### Request 2

The measures (including innovative approaches) that you will take to encourage and incentivize vehicle owners to bring their vehicles in for repair (e.g., expanding service hours for more convenience, accommodating owners whose vehicles cannot immediately be repaired by providing loaner vehicles, and the use of print, radio, television, and social media to inform owners of the recall program).

### Answer

As the Agency has instructed manufacturers, Ford's written communications with its customers regarding this field service program will be within the requirements of Part 577, including language within the Customer Notification Letters that refer to this issue as a safety defect. The Ford program launched last week. If there is a lag in customer demand, Ford will encourage customers to bring their vehicles to dealers when part supply exceeds owner demand. As the agency is aware, service part supply is currently limited.

### Request 3

The efforts you will make to maintain clear, thorough, and up-to-date information regarding the recall on your website, and within your dealer network, to better inform consumers.

### Answer

Customers have a variety of methods to acquire up-to-date information regarding our service action. Customers who want to know if their vehicle is affected can either call Ford's toll-free line (1-866-436-7332), contact a local Ford or Lincoln dealer who can obtain specific information regarding the vehicles from the Ford On-line Automotive Service Information System (OASIS) database, or visit Ford.com and click on 'Safety Recalls' near the bottom of the page. This links to our online recall search tool where owners can enter their Vehicle Identification Number (VIN) to see open safety, compliance or emissions recalls, as well as customer satisfaction programs. If Ford develops additional information for consumers, we will update our website and communicate to our owners and dealers.

### Request 4

Any other interim measures you have taken or can take to address the safety risk and up-to-date information on the number of loaner vehicles you have provided.

Answer

Ford is cooperating with the Agency's investigation. To date, we have not identified any affected inflators in Ford products. If we find that Ford vehicles do have affected inflators, Ford will take appropriate action to address customer safety. Ford has worked closely with Takata to expedite the supply of replacement inflators. The Ford program launched last week. If there is a lag in customer demand, Ford will encourage customers to bring their vehicles to dealers when part supply exceeds owner demand.

Request 5

A description of any ongoing efforts to evaluate the safety risks of Takata air bags in your vehicles, including a description of testing that is currently underway or planned.

Answer

In October, NHTSA contacted Ford requesting an accelerated program to obtain approximately 50 airbag inflators from vehicles already included in the program and located in one of the four southernmost counties in Florida. Ford identified fleet customers included in the recall program and is expediting the recovery of a targeted sample of air bag inflators in the most expeditious manner possible in response to NHTSA's request. Ford added the resources of a contractor to further expedite obtaining the air bags from the field. To date, Ford has identified 37 vehicles that will be serviced and their inflators will be shipped to Takata within the next week. We will continue to pursue additional investigative actions and will work closely with the Agency as we have throughout this investigation.

Request 6

Testing results and data that you have conducted or gathered concerning your vehicles that contain Takata air bags that were sold or registered within the hot, humid regions of the country identified in NHTSA's consumer advisory.

Answer

We have been working cooperatively with the Agency throughout this investigation. Ford has conducted a thorough search of lawsuits and claims, customer complaints, and field reports from the United States and Federalized Territories to identify any reports that would be consistent with an air bag inflator rupture and have not identified any reports of inflator rupture.

Further, Ford is conducting an accelerated program to obtain approximately 50 airbag inflators from vehicles already included in the program and located in one of the four southernmost counties in Florida. Ford identified fleet customers included in the recall program and is expediting the recovery of a targeted sample of air bag inflators in the most expeditious manner possible in response to NHTSA's request. Ford added the resources of a contractor to further expedite obtaining the air bags from the field. To date, Ford has identified 37 vehicles that will be serviced and their inflators will be shipped to Takata within the next week. We will continue to pursue additional investigative actions and will work closely with the Agency as we have throughout this investigation.

### Request 7

Testing results and data that you have conducted or gathered concerning your vehicles that contain Takata air bags that were sold or registered outside of the hot, humid regions of the country identified in NHTSA's consumer advisory.<sup>1</sup>

### Answer

As mentioned in Ford's response to Request 6, Ford conducted a search of all reports that are related to air bags for those vehicles identified by Takata that may contain suspect inflators and have not identified any reports alleging inflator rupture. Ford does not have test data for vehicles outside of the region identified in NHTSA's consumer advisory. We will continue to pursue additional investigative actions and will work closely with the Agency as we have throughout this investigation.

### Request 8

The testing protocols/methodologies used (or that will be used) to conduct or gather the information described in Nos. 5 and 7 above.

### Answer

Our primary focus has been to support NHTSA's efforts to conduct testing at Takata. Our current plan is to follow the methodologies developed by Takata. We will continue to pursue additional investigative actions and will review any testing with the Agency.

### Request 9

Up-to-date information regarding the number of vehicles covered by your recall, the number of those vehicles still in service and the number of vehicles remedied with a replacement air bag.

### Answer

Ford provided updated information on November 3, 2014 regarding the number of vehicles covered by Ford's field service actions and 85,023 vehicles are included in this action.

Ford mailed letters to Ford GT owners beginning the week of October 27, 2014, and mailed letters to Ford Mustang owners earlier this week. Ford will begin notifying Ford Ranger owners as soon as parts for both the driver and passenger airbag inflators are available. As Ford has just launched its service program, the available completion information is not current. The data is delayed due to dealer submission timing and warranty claim processing. At the beginning of a program, accurate completion data is not available. Ford will provide updated completion information as soon as accurate data is available.

Request 10

Information on the testing, if any, you have done on the replacement air bags.

Answer

Ford has not conducted any unique tests on replacement air bags. As part of the production validation process, Takata regularly tests its air bags for inflator performance and Ford regularly reviews this production data.

Ford is cooperating with the Agency's investigation. To date, we have not identified any affected inflators in Ford products. If, in the course of this investigation, we find that an inflator poses a safety risk to our customers, Ford will take appropriate action to address customer safety. Our decisions are driven by the data available. When the data indicates a safety recall is necessary we move quickly on behalf of our customers.

Ford remains committed to ensuring the safety of its vehicles and its customers. We will continue to aggressively gather parts, evaluate test results, and act appropriately based on the data.

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

Sincerely,

Steven M. Kenner