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June 14, 2017

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RE: Audit of Safety Recall Campaign Completion- Query AQ17-001 of  
Champion Ford Edinboro, Inc.

Dear Mr. Ridella, Ms. Mykytiuk, and Mr. Ansley:

We are writing today on behalf of our client, Champion Ford Edinboro, Inc. ("Champion"), responding to your May 31, 2017 audit inquiry request for the AQ17-001 Ford Motor Company, Inc. ("Ford") Recall. Each item requested in your letter will be addressed in turn.

1. **Request # 1**

Your first request stated the following:

1. For each vehicle identification number ("VIN") listed below in Table A, identify the following:
  - a. The disposition of the vehicle (e.g. sold, lease, etc.);
  - b. The date of the disposition you identified in (a);
  - c. The date on which the vehicle left the possession of Champion Ford Edinboro (e.g. delivery date to the purchase); and
  - d. The date on which the recall remedy was performed on the vehicle.

Provide your responses in a table in Microsoft Access or Excel entitled "Vehicles AQ17-001."

Attached to this correspondence is a table entitled "Vehicles AOI7-001," as requested (the "Table"). Please note that a vehicle, with VIN 1FTFX1EF9EF [REDACTED] (the "Remaining Vehicle"), has no identified Recall Remedy Date within the Table. This absence occurs because the Remaining Vehicle has not been inspected and serviced pursuant to the associated recall, as of today's date. The owner has been contacted regarding this oversight and the Remaining Vehicle will be inspected and repaired as soon as possible.

**2. Request #2**

You next request for information provided as follows:

2. Produce copies of all documents, including delivery checklists or other documents that substantiate purchase (or lessee) delivery dates, that evidence or are otherwise related to your responses to each item within the scope of Request No. 1. Organize the documents separately by VIN.

We have prepared the above documents, organized by VIN number, and will be submitting the documents in "Dropbox" format, per our conversation with Ms. [REDACTED]. These documents contain all relevant information that "proves" and "evidences" the dates provided in the Table, absent documentation regarding recall inspection and repair service for the Remaining Vehicle.

**3. Request #3**

Your third request for information asked for the following:

3. Provide Champion Ford Edinboro's policy for the process it conducts when it receives a recall notice from Ford. Provide the date this policy was implemented. Also, explain if any changes have been made to this policy after the discovery that new vehicles were delivered with outstanding safety recalls.

We have included a copy of the Policy for Checking Open Recalls, adopted by Champion on January 17, 2017 and executed by each service provider and service manager employed by Champion. Champion wishes to note that it has been their internal policy for over twenty (20) years to monitor Ford recalls and remove "recalled vehicle" models prior to their sale. In addition, Ford has recently instituted the Smart Vincent system ("Smart Vincent") and related procedures for vehicular sales managers and salespersons. Smart Vincent prevents dealers, like Champion, from selling vehicles under recall by mandating that dealer employees check each vehicle for potential recalls prior to the execution of sale documents. Ford's internal audits mandate that Smart Vincent checks are performed for every Ford vehicle sold. Champion will be strictly adhering to Smart Vincent going forward to prevent any other incidents.

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Elizabeth Mykytiuk  
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4. Request #4

Your final request for information states as follows:

4. Provide any additional information Champion Ford Edinboro considers for the agency to consider in reviewing and evaluating Champion Ford Edinboro's responses to any of the requests above. As one example, identify any anomalies in the data or documents and explain the reason(s) for those anomalies.

As noted in our answer to Request #1, recall service has not been performed on the Remaining Vehicle. Champion has contacted the owner of the Remaining Vehicle, and will be working to remedy the lack of performed service as soon as possible. Champion will send the NHTSA evidence of the recall inspection service on the Remaining Vehicle subsequent to its performance. Champion would like to reiterate that this incident is highly uncommon for Champion and it diligently works to ensure that recalled vehicles are not sold to the general public. Champion's employees shall utilize its Recall Policy and Ford's Smart Vincent procedures to prevent any similar incidents from occurring in the future.

We hope that the information provided is sufficient regarding each of your audit requests. Thank you and please do not hesitate to contact us at (814) 459-2800 with any questions you may have.

Very truly yours,

KNOX McLAUGHLIN GORNALL &  
SENNETT, P.C.

By:   
Timothy M. Sennett

By:   
Christopher F. Sennett

TMS/cfs  
# 1814945.v1

cc: Mark Winkler  
Richard Carson

**POLICY FOR CHECKING FOR OPEN RECALLS**

**ALL SERVICE ADVISORS AND SERVICE MANAGERS WILL CHECK ALL FORD NEW, USED AND CUSTOMER OWNED VEHICLES FOR OPEN RECALLS. OASIS SHEETS WILL BE HIGHLIGHTED AND INITIALED WHEN OASIS IS CHECKED BY THE ADVISOR. AS A BACKUP TO THE ADVISORS ALL TECHS WILL CHECK AND INITIAL OASIS TOO.**

*Justin Richards  
Kyle a. Damm  
The Tech*

*you Wes  
Deak Hor*

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*[Signature]*

*[Signature]*

*[Signature]*

*[Signature]*  
*[Signature]*

VIN #	Disposition	Disposition Date	Delivery Date	Recall Remedy Date
1 FA6P0H71	SOLD	5/21/2015	5/21/2015	10/19/2015
1FA6P0HD8	SOLD	9/30/2015	9/30/2015	12/21/2015
1FADP3K23F	SOLD	7/25/2015	7/25/2015	10/7/2015
1FADP5AU1	SOLD	6/16/2014	6/16/2014	12/19/2014
1FAHP2E97E	SOLD	6/9/2014	6/9/2014	9/20/2014
1FMCU9G96	SOLD	7/18/2015	7/18/2015	10/3/2015
1FMCU9G97	SOLD	7/7/2014	7/7/2014	12/15/2014
1FMCU9G98	SOLD	8/22/2014	8/22/2014	1/19/2015
1FMCU9GX2	SOLD	5/13/2014	5/13/2014	7/9/2014
1FMCU9GX5	SOLD	7/22/2015	7/22/2015	12/2/2015
1FMCU9GX5	SOLD	7/20/2015	7/20/2015	6/7/2017
1FMCU9GX7	SOLD	5/7/2014	5/7/2014	6/10/2014
1FMCU9HXX	SOLD	6/26/2014	6/26/2014	8/23/2014
1FMCU9J93E	SOLD	10/21/2014	10/21/2014	5/20/2014
1FMCU9J93F	SOLD	7/16/2015	7/16/2015	11/18/2015
1FMCU9J98F	SOLD	7/13/2015	7/13/2015	10/7/2015
1FTFX1EF7E	SOLD	12/29/2014	12/29/2014	1/2/2015
1FTFX1EF9E	SOLD	5/13/2014	12/26/2014	Not completed
3FA6P0H72F	SOLD	5/5/2015	5/5/2015	3/12/2016
3FA6P0HD2E	SOLD	5/29/2015	5/29/2015	09/03/2015, 10/09/2015
3FA6P0HD2F	SOLD	5/13/2015	5/13/2015	7/6/2015
3FA6P0HD6E	SOLD	5/27/2015	5/27/2015	2/6/2015