



U.S. Department
of Transportation
**National Highway
Traffic Safety
Administration**

JUN 25 2018

1200 New Jersey Avenue SE
Washington, DC 20590

Via Certified Mail and Email (delivery receipt requested)

Mr. Todd Fronckowiak
Assistant Director, Global Automotive
Safety Compliance
Ford Motor Company
Fairlane Plaza South, Ste. #500
330 Town Center Drive
Dearborn, MI 48126-2738

NEF-107aa
AQ18-001
17V-408

Re: Audit of Safety Recall Campaign, Rental of Recalled Vehicles, Zipcar, Inc.

Dear Mr. Fronckowiak:

We are writing Ford Motor Company (Ford) with a request for more information regarding Audit Query (AQ18-001). As you may know, as part of our continuing investigation we issued a request for information to Zipcar, Inc. (Zipcar). We requested copies of the recall notices it received from Ford regarding recall 17V-408 (Subject: Driveshaft Coupling may Fail) as well as the policies or procedures it follows when managing safety recalls within the Zipcar fleet. We also requested Zipcar supply data on any Ford Transit vehicles it handled subject to recall 17V-408.

Zipcar responded to our letter and provided a list of Vehicle Identification Numbers (VINs) for recalled Ford Transit vehicles within its fleet. Zipcar also included remedy dates and remedy locations regarding the repairs for those vehicles under recall 17V-408.

The purpose of this request is to ascertain additional information about the recall remedies for these vehicles.

DEFINITIONS

Unless otherwise stated in the text, the following definitions and instructions apply to these information requests:

1. "Ford" means Ford Motor Company, including all of its divisions, subsidiaries and affiliated enterprises and its employees, and all agents, contractors, consultants, attorneys and law firms and other persons engaged directly or indirectly (e.g., employee of a consultant) by or under the control of Ford (including all business units and persons previously referred to).
2. The term "you" or "your" refers to Ford.
3. "Zipcar" means Zipcar, Inc., including all of its divisions, affiliated enterprises (including but not limited to PV Holding Corporation) and its employees, and all agents, contractors, consultants, attorneys and law firms and other persons engaged directly or indirectly (e.g., employee of a consultant) by or under the control of Zipcar (including all business units and persons previously referred to).
4. The term "communications" is used in the broadest sense of the word and shall mean the exchange, transfer, or relay of any ideas, messages, or information by speech, writing, or other means, whether electronic, paper, or in person.
5. The term "person" includes natural persons, proprietorships, partnerships, firms, corporations, federal, state, and local governments, all departments and agencies thereof, and any other governmental agencies, political subdivisions, groups, associations, or organizations, whether located in the United States or abroad.
6. The term "relate to" or "relating to" means constituting, comprising, containing, setting forth, showing, disclosing, describing, explaining, summarizing, concerning, or referring to, directly or indirectly.
7. The term "explain," "describe in detail," or "state in detail" mean the following:
 - a. Describe fully by reference to underlying facts rather than ultimate facts or conclusions of law or fact.
 - b. Particularize as to:
 - i. The identity of each person involved in each such event, including but not limited to persons employed Ford and those persons purporting to act for Ford;
 - ii. The specific acts of each person participating in each such event;
 - iii. The date and time of each such event;
 - iv. The address and location of each such event; and
 - v. The identity of each person present during each such event.

8. The term "Document(s)" is used in the broadest sense of the word and shall mean all original written, printed, typed, recorded, or graphic matter whatsoever, however produced or reproduced, of every kind, nature, and description, and all non-identical copies of both sides thereof, including, but not limited to, papers, letters, memoranda, correspondence, communications, electronic mail (e-mail) messages (existing in hard copy and/or in electronic storage), and faxes. For purposes of this request, any document that contains any note, comment, addition, deletion, insertion, annotation, or otherwise comprises a non-identical copy of another document shall be treated as a separate document subject to production.
9. "Safety recall 17V-408" means the safety recall Ford is conducting through its dealerships to remedy certain model year 2015 through 2017 Ford Transit vehicles equipped with a flexible driveshaft coupling that may prematurely fail. A failed driveshaft coupling may prevent the vehicle from moving under its own power, increasing the risk of a crash.
10. "Recall notice" refers to any action in which Ford notifies its owners and purchasers, pursuant to 49 CFR § 577, of a safety recall.
11. Other Terms: To the extent that they are used in this information request, the terms "claim," "consumer complaint," "dealer field report," "field report," "fire," "fleet," "good will," "make," "model," "model year," "notice," "property damage," "property damage claim," "rollover," "type," "warranty," "warranty adjustment," and "warranty claim," whether used in singular or plural form, have the same meaning as found in 49 CFR 579.4.
12. The singular includes the plural; the plural includes the singular. The masculine gender includes the feminine and neutral genders; and the neutral gender includes the masculine and feminine genders. "And" as well as "or" shall be construed either disjunctively or conjunctively, to bring within the scope of this information request all responses that might otherwise be construed to be outside its scope. "Each" shall be construed to include "every" and "every" shall be construed to include "each." "Any" shall be construed to include "all" and "all" shall be construed to include "any." The use of a verb in any tense shall be construed as the use of the verb is a past or present tense, whenever necessary to bring within the scope of the document request all responses which might otherwise be construed to be outside its scope.

INFORMATION REQUESTS

1. For each and every VIN provided in Appendix A, produce a spreadsheet table detailing the following about each vehicle as it relates to recall 17V-408:
 - a. The VIN;
 - b. Whether the interim recall remedy was performed on the vehicle. "Interim recall remedy" refers to the inspection and repair procedures Ford instructed its dealerships to perform under the recall until the permanent recall remedy becomes available;
 - c. The date on which the interim recall remedy was performed on the vehicle (if applicable);
 - d. The reported mileage of the vehicle at the time the interim recall remedy was performed (if applicable);
 - e. Whether the recall remedy was performed on the vehicle. "Recall remedy" refers to the inspection and repair procedures Ford instructed its dealerships to perform under the recall;
 - f. The date on which the recall remedy was performed on the vehicle (if applicable);
 - g. The reported mileage of the vehicle at the time the recall remedy was performed (if applicable);

Provide your responses in a table in Microsoft Access or Excel entitled "Appendix A Vehicle Remedy Data."

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

If Ford claims that any of the information or documents provided in response to this information request constitutes confidential commercial material within the meaning of 5 U.S.C. § 552(b)(4), or is protected from disclosure pursuant to 18 U.S.C. §1905, the company must submit supporting information together with the materials that are the subject of the confidentiality request to the Office of Chief Counsel, W41-326 National Highway Traffic Safety Administration, 1200 New Jersey Ave., SE, Washington, D.C. 20590. Please see 49 CFR Part 512 for further instructions as to what is required to properly file a request for confidential treatment.

Please provide your written response **no later than two weeks from the date of this letter.**

Please direct your response to me and note conspicuously on your response the investigation number assigned to this matter (e.g., AQ18-001). Should you have any questions or concerns, please contact Alex Ansley on my staff at (202) 493-0481 or at alexander.ansley@dot.gov.

Sincerely,



Jennifer Timian
Chief, Recall Management Division
Office of Defects Investigation
Enforcement

Enclosures

Appendix A

No.	VIN
1	1FTNE1YM0FK
2	1FTNE1YM0FK
3	1FTNE1YM0FK
4	1FTNE1YM0FK
5	1FTNE1YM0FK
6	1FTNE1YM0FK
7	1FTNE1YM1FK
8	1FTNE1YM1FK
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67	1FTNE2YM9FK	
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69	1FTNE2YMXFK	
70	1FTYE1ZMOGK	
71	1FTYE1ZMOGK	
72	1FTYE1ZMOGK	
73	1FTYE1ZMOGK	

74	1FTYE1ZM0GH	
75	1FTYE1ZM0GH	
76	1FTYE1ZM0GH	
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78	1FTYE1ZM0GH	
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85	1FTYE1ZM1GH	
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87	1FTYE1ZM1GH	
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