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April 23, 2018

Mr. Stephen A. Ridella, Director
Enforcement Division
Office of Vehicle Safety Compliance
National Highway Traffic Safety Administration
1200 New Jersey Ave., SE, Room W45-211
Washington, DC 20590

Dear Mr. Ridella:

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

Reference: NEF-107aa / AQ18-001 / 17V-408

This is the Ford Motor Company (Ford) response to your April 2, 2018, letter requesting information concerning recall completion information for vehicles included in safety recall 17V-408 (Ford number 17S15) owned by Zipcar or PV Holding Corporation.

Ford's response to this Audit Query information request was prepared pursuant to a diligent search for the information requested. While we have employed our best efforts to provide responsive information, the breadth of the Agency's request and the requirement that information be provided on an expedited basis make this a difficult task. We nevertheless have made substantial effort to provide thorough and accurate information, and we would be pleased to meet with Agency personnel to discuss any aspect of this Audit Query.

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. 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 notes that some of the information being produced pursuant to this inquiry may contain personal information such as 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 April 2, 2018, the date of your inquiry. Ford has searched within the following offices for responsive documents: Ford Customer Service Division, and Marketing, Sales & Service.

Ford understands that Zipcar has a business relationship with PV Holding Corporation. However, Ford does not have details regarding the organizational structure of PV Holding Corporation, any business entities related to it, or its specific business relationship with Zipcar. Our vehicle ownership information is obtained and/or updated during the recall notification process through a business relationship with IHS Inc. In the preparation of this response, Ford searched its databases for U.S. vehicles included in Ford recall 17S15 (NHTSA number 17V-408) and identified vehicle owner information noting PV Holding Corporation or other entities that we believe may be related to PV Holding Corporation or Zipcar. Ford does not have information regarding whether Zipcar possesses these vehicles or the geographic location of the vehicles. Ford would be willing to discuss revised search criteria with the agency if additional vehicle information is required.

Request 1

Identify any and all notices or communications Ford transmitted or otherwise made available to Zipcar (including, but not limited to, notifications, service bulletins, recall notices, reports, and letters, whether paper or electronic (such as through any Ford interactive network)) concerning safety recall 17V-408. For each notice or communication you identify, state: (a) the date Ford transmitted it or otherwise

made it available to Zipcar; (b) the type of the notice or communication (e.g., recall notice, dealer bulletin, etc.); (c) the means of transmission (e.g., email, Ford interactive Network, fax, etc.); and (d) the number and/or VINs of affected units Ford identified as within Zipcar's possession, if any.

Produce a copy of each notice or communication you identify in response to this question, including copies of any accompanying enclosures or attachments.

Answer

As noted above, Ford understands that Zipcar has a business relationship with PV Holding Corporation. However, Ford does not have details regarding the organizational structure of PV Holding Corporation, any business entities related to it, or its specific business relationship with Zipcar. At the time Ford recall 17S15 was approved, Ford identified the VINs of the vehicles included in safety recall 17S15 and requested the registration name and address for each from IHS Inc. On July 21, 2017, a defect and noncompliance owner notification (as per part 577) for each affected vehicle was mailed by First Class U.S. mail to the address provided by HIS Inc. As requested, a sample copy of this document is provided in Appendix A.

Also, as part of the recall process, recall information is made available to dealers and fleets authorized to perform warranty repairs via Ford's On-line Automotive Service Information System (OASIS). Using OASIS, dealers and fleets authorized to perform warranty repairs have the ability to enter individual VINs, and the OASIS system will display any and all safety recalls that Ford records indicate have not been completed on a specific vehicle. OASIS was activated with VIN related information pertaining to recall 17S15 on June 27, 2017. Additionally, Ford offers an optional free service for fleet customers that provides a customized recall communication of the fleet's VINs affected by a recall.

Request 2

Identify any other communications, other than those already identified and produced in your response to Information Request No. 1, between Ford and Zipcar concerning safety recall 17V-408. For each such communication, state: (a) the date Ford transmitted it or otherwise made it available to Zipcar; (b) the purpose of the communication; and (c) the means of transmission.

Produce a copy of each communication you identify in response to this question, including copies of any accompanying enclosures or attachments.

Answer

Ford is not aware of any other communications with Zipcar regarding Ford recall 17S15 other than those already identified and produced in our response to Request 1.

Request 3

For each and every vehicle recalled under 17V-408, and which Ford notified Zipcar (by means including, but not limited to, a specific recall notice), produce a spreadsheet table detailing the following about each new vehicle that was in Zipcar's possession, subject to that recall:

- a. The VIN;
- b. The date Ford issued a recall notice to Zipcar;
- c. The means of transmission of the notification referred to in subpart (b) above (email, U.S. Mail, Ford interactive network, fax, etc.);
- d. The date Ford transmitted or otherwise made available to Zipcar a VIN list or other information from which to ascertain the vehicle's inclusion in the safety recall;
- e. The means of transmission for the VIN list or other information from which to ascertain the vehicle's inclusion in the safety recall and recall notice, (e.g., email, mailed letter, Ford interactive network, fax etc.);
- f. 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;
- g. The date on which the interim recall remedy was performed on the vehicle (if applicable);
- h. 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;
- i. The date on which the recall remedy was performed on the vehicle;
- j. The name and address of the entity that performed the recall remedy on the vehicle;

Provide your responses in a table in Microsoft Access or Excel entitled "Vehicles Requiring Recall Notice."

Answer

The answers to subparts (b) through (e) are provided in our response to Request 1 and 2. The remaining requested information, where available, is provided in Appendix B. The information contained in Appendix B was compiled by querying various databases within Ford's control. Some of this information is acquired from entities outside Ford, and Ford cannot attest to the accuracy or validity of the information acquired from these outside entities.

Request 4

Produce copies of all documents that evidence, substantiate, or are otherwise related to your responses to each item within the scope of Request No. 3. Organize the documents separately by VIN.

Answer

The Ford database queried to provide the recall completion information contained in Appendix B in response to Request 3 is considered to be the official record for this information. As discussed above, vehicle owner information is acquired from entities outside Ford, and Ford cannot attest to the accuracy or validity of the information acquired from these outside entities.

Request 5

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 or documents and explain the reason(s) for those anomalies.

Answer

Ford has no additional information to provide at this time.

If you have any further questions, please feel free to contact me.



Desi Ujkashevic
Global Director
Automotive Safety Office

Attachments