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June 11, 2020

[REDACTED], Ph.D.

Director
Office of Defects Investigation
Office of Enforcement
National Highway Traffic Safety Administration
1200 New Jersey Avenue, SE, Room W45-302
Washington, DC 20590

Re: NHTSA Information Request EA18-002

Dear Dr. [REDACTED]:

The Ford Motor Company (Ford) response to the Agency's request (discussions held 2/13/2020 and 2/19/2020) for an updated analysis of the 2006-2010 model year Ford Fusion, Mercury Milan, Lincoln Zephyr, and Lincoln MKZ vehicles covered by the 19S54 field service action is attached.

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

Sincerely,

A handwritten signature in black ink, appearing to read "Desi Ujkashevic".

Desi Ujkashevic

Enclosures

FORD MOTOR COMPANY (FORD) RESPONSE TO EA18-002

Ford's response to this Recall 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 Recall 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 has construed this request as pertaining to vehicles manufactured for sale in the United States, its protectorates, and territories.

Ford notes that some of the information being produced pursuant to this inquiry may contain personal information such as customer names, addresses, telephone numbers, and 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).

Per Ford's discussions with the Agency on 2/13/2020 and 2/19/2020, Ford will be providing the Agency an updated analysis of the 2006-2010 model year Fusion / Milan / Zephyr / MKZ vehicles covered by the 19S54 field service action, built during the time period 2/22/2006 through 7/15/2009.

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 12/11/2019, the date the field service action was approved. Ford has searched within the following offices for responsive documents: Ford Customer Service Division, Office of the General Counsel, and North American Product Development.

1. Provide a summary of claim counts through the Ford decision date (12/11/2020).
 - a. Categories used in the previous submittal
 - b. Separated by Make/Model/Year

Answer

For the 2006-2010 Fusion / Milan / Zephyr / MKZ vehicles, the summary of claim counts are listed in the table below:

Make	Model	2006 MY	2007 MY	2008 MY	2009 MY	2010 MY	Total
Ford	Fusion	3	72	285	201	26	587
Mercury	Milan	1	52	88	41	3	185
Lincoln	Zephyr	1					1
Lincoln	MKZ		78	171	34	6	289

Claim counts include reports categorized as A1, A1A, A2, & A2A. A more detailed analysis of claims is provided in Appendix A.

The following categorizations were used in the review of reports located in each of these searches:

Category	Allegation
A1	Reduced brake performance / extended stopping distance issue; ABS/HCU unit concern
A1A	Reduced brake performance / extended stopping distance after an ABS event; ABS/HCU unit concern
A2	Brake pedal feel issue; ABS/HCU unit concern
A2A	Brake pedal feel issue after an ABS event, ABS/HCU unit concern

- Provide copies all files related to allegations of crash, injury, and/or fatality.

Answer

Ford is providing owner and field reports as well as lawsuits and claims for 2006-2010 model year Fusion / Milan / Zephyr / MKZ vehicles related to allegation of crash and/or injury, in Appendix B. There were no reports related to fatality for this defect. The documents include reports categorized as A1, A1A, A2, & A2A.

Scope of Records	Number of Accidents	Number of Injuries	Number of Fatalities
A1 / A1A / A2 / A2A	14	2	0

- Provide a copy of the latest 14D.

Answer

The most recent 14D is provided in Appendix C.

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