INFORMATION REDACTED PURSUANT TOTHE FREEDOM
OF INFORMATION ACT (FOIA), 5 U.S.C.552(B)(6)

Desi Ujkashevic, Global Director
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November 2, 2018

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

Dear Mr. Ridella:

Subject: PE18-007:NEF-103dlb

Enclosed is Ford Motor Company's final response to your August 2, 2018 letter, that requested information about the 2013 model year Escape vehicles equipped with 1.6L engines. Answers to request 8 is attached. A partial response to request number 2 is attached.

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

Sincerely,

[redacted]

Desi Ujkashevic

Attachment

ATTACHMENT
November 2, 2018

FORD MOTOR COMPANY (FORD) FINAL RESPONSE TO PE18-007

Ford's response to this Preliminary Evaluation 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 within an eight week time frame makes 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 Preliminary Evaluation.

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).

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 August 2, 2018, the date of your inquiry. Ford has searched within the following offices for responsive documents: Sustainability, Environment and Safety Engineering, Ford Customer Service Division, Global Core Engineering, Office of the General Counsel and North American Product Development.

Request 2

State the number of each of the following, received by Ford, or of which Ford is otherwise aware, which relate to, or may relate to, the alleged defect in the subject and peer vehicles:

a. Consumer complaints, including those from fleet operators;
b. Field reports, including dealer field reports;
c. Reports involving a crash, injury or fatality;
d. Reports involving a fire;
e. Property damage claims;

f. Third-party arbitration proceedings where Ford is or was a party to the arbitration; and
g. Lawsuits, both pending and closed, in which Ford is or was a defendant or codefendant.

For subparts "a" through "g' state the total number of each item (e.g., consumer complaints, field reports, etc.) separately. Multiple incidents involving the same vehicle are to be counted separately. Multiple reports of the same incident are also to be counted separately (i.e., a consumer complaint and a field report involving the same incident in which a crash occurred are to be counted as a crash report, a field report and a consumer complaint).

In addition, for items "c" through "g" provide a summary description of the alleged problem and causal and contributing factors and Ford's assessment of the problem, with a summary of the significant underlying facts and evidence.

Answer

Claim and lawsuit information maintained by Ford's Office of the General Counsel (OGC) pertaining to (e), (f) and (g) is provided with this submission in **Appendix C**.

Descriptions of the criteria used to search lawsuits and claims are provided in **Appendix B.**

The following categorizations were used in the review of lawsuits and claims:

Category	Allegation
A1	Stalls while driving due to coolant system failure/engine overheat
A2	Limp home mode while driving due to coolant system failure/engine overheat
A3	Stalls while stationary due to coolant system failure/engine overheat

Request 8

Describe all assessments, analyses, tests, test results, studies, surveys, simulations, investigations, inquiries and/or evaluations (collectively, "actions") that relate to, or may relate to, the alleged defect in the subject and peer vehicles that have been conducted, are being conducted, are planned, or are being planned by, or for, Ford. For each such action, provide the following information:

a. Action title or identifier;
b. The actual or planned start date;
c. The actual or expected end date;
d. Brief summary of the subject and objective of the action;
e. Engineering group(s)/supplier(s) responsible for designing and for conducting the action; and
f. A brief summary of the findings and/or conclusions resulting from the action.

For each action identified, provide copies of all documents related to the action, regardless of whether the documents are in interim, draft, or final form. Organize the documents chronologically by action.

Answer

Ford is submitting documentation pertaining to this request after 17V209 (17S09) was announced on March 27, 2017, per an email from the agency on September 18, 2018.

Ford is construing this request broadly and is providing not only studies, surveys, and investigations related to the alleged defect, but also notes, correspondence, and other communications that were located pursuant to a diligent search for the requested information. Ford is providing the responsive non-confidential documentation in **Appendix I**.

To the extent that the information requested is available, it is included in the documents provided. If the Agency should have questions concerning any of the documents, please advise.

Ford is submitting additional responsive documentation in **Appendix J** with a request for confidentiality under separate cover to the Agency's Office of the Chief Counsel pursuant to 49 CFR Part 512. Redacted copies of the confidential documents will be provided under separate cover, on separate media, to the Agency's Office of Chief Counsel as **Appendix J – Redacted**.

In the interest of ensuring a timely and meaningful submission, Ford is not producing materials or items containing little or no substantive information. Examples of the types of materials not being produced are meeting notices, raw data lists (such as part numbers or VINs) without any analytical content, duplicate copies, non-responsive elements of responsive materials, and draft electronic files for which later versions of the materials are being submitted.

Through this method, Ford is seeking to provide the Agency with substantive responsive materials in our possession in the timing set forth for our response.

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