



***VIA EMAIL***

Stephen A. Ridella, PhD  
Office Director, Office of Defects Administration  
National Highway Traffic Safety Administration  
1200 New Jersey Avenue SE  
Washington, D.C. 20590

**Re: Supplemental Response to NHTSA Information Request re EA19-001 (NED-102dp)**

Dear Dr. Ridella,

ZF hereby submits its supplemental response to the National Highway Traffic Safety Administration's (NHTSA) May 3, 2022 request for information relating to EA19-001. This letter supplements and updates the initial response submitted by ZF on June 14, 2022.

- 1. State the number of each of the following, received by ZF, or of which ZF is otherwise aware, which relate to, or may relate to, the alleged defect in the subject component:**
  - a. Consumer complaints, including those from fleet operators;**
  - b. Field reports, including subject vehicle manufacturer field reports in ZF's possession;**
  - c. Reports for ACUs returned from the field or from test vehicles;**
  - d. Reports involving a crash, injury or fatality;**
  - e. Property damage claims;**
  - f. Third-party arbitration proceedings where ZF is or was a party to the arbitration; and**
  - g. Lawsuits, both pending and closed, in which ZF 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 "d" through "g" provide a summary description of the alleged problem and causal and contributing factors and ZF's assessment of the problem, with a summary of the significant underlying facts and evidence. For items "f" and "g,"**

**identify the parties to the action, as well as the caption, court, docket number, and date on which the complaint or other document initiating the action was filed.**

ZF Response to NHTSA IR 1 [CONFIDENTIAL]: Per the Request’s instruction that “[m]ultiple reports of the same incident are also to be counted separately,” the numbers ZF provides below are not cumulative, as in some instances the same incident is accounted for in multiple subsections. ZF incorporates and refers to the IR 1 tab of the enclosed spreadsheet entitled “2022.06.30 ZF Response to NHTSA IR 1 and 2 – REQUEST NUMBER ONE DATA,” which contains summary descriptions and, where applicable, information identifying a filed lawsuit for items “d” through “g.”

a.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]



2. Separately, for each item (complaint, report, claim, notice, or matter) within the scope of your response to Request No. 1, state the following information:
- a. ZF's file number or other identifier used;
  - b. The category of the item, as identified in Request No. 1 (i.e., consumer complaint, field report, etc.);
  - c. Vehicle owner or fleet name (and fleet contact person), street address, email address and telephone number;
  - d. Vehicle's VIN;
  - e. Vehicle's make, model and model year;
  - f. Vehicle's mileage at time of incident;
  - g. Incident date;
  - h. Report or claim date;
  - i. Whether a crash is alleged;
  - j. Whether property damage is alleged;
  - k. Number of alleged injuries, if any;
    - (i) The AIS score of the injuries; and
    - (ii) Description of injury and location.
  - l. Number of alleged fatalities, if any;
  - m. Supplier of the subject component; and
  - n. All applicable indicators for the Alleged Defect (items A through H as identified above).

**Provide this information in Microsoft Access 2010, or a compatible format, entitled "REQUEST NUMBER ONE DATA." (Request TWO in previous IR Letter)**

ZF Response to NHTSA IR 2 [CONFIDENTIAL]: ZF refers to the enclosed spreadsheet entitled "2022.06.30 ZF Response to NHTSA IR 1 and 2 - REQUEST NUMBER ONE DATA," which includes the information sought in Request 2 and presently known to ZF.

ZF provides the following additional information concerning certain categories of information requested:

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- [Redacted list item]

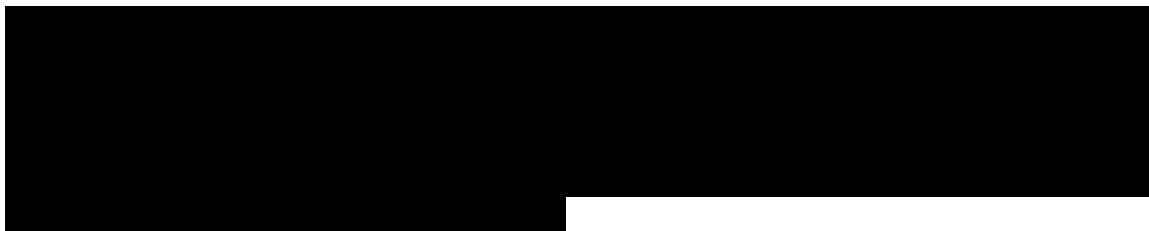
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- [Redacted list item]

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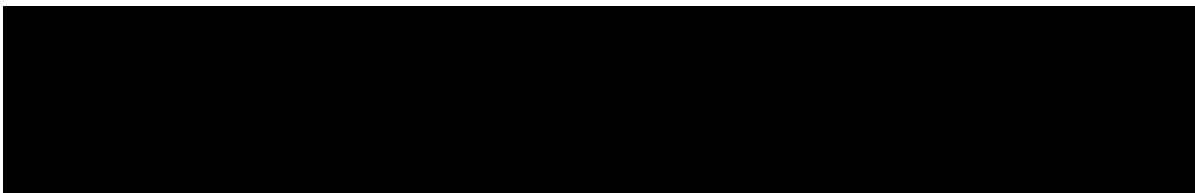
- 3. Produce copies of all documents related to each item within the scope of Request No. 1. Organize the documents separately by category (i.e., consumer complaints, field reports, etc.) and describe the method ZF used for organizing the documents. Describe in detail the search methods and search criteria used by ZF to identify the items in response to Request No. 1.**

ZF Response to IR 3:

As discussed with NHTSA on June 2, 2022, ZF is not reproducing the materials that it has previously submitted to NHTSA since 2016. In addition, ZF has provided its narrative responses to Request No. 1 here, and can provide additional supporting documents upon request by NHTSA after NHTSA has reviewed these responses.

- 4. 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 vehicles that have been conducted by, or for, ZF. For each such action, provide the following information:**
  - a. Action title or identifier;**
  - b. The actual 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. Final Report of the findings and/or conclusions resulting from the action.**

ZF Response to NHTSA IR 4 [CONFIDENTIAL]:



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5. For the subject component, provide a list of all possible fault codes and/or diagnostic trouble codes stored in the ACU which could be associated with the alleged defect. For each fault code provide:
- a. The identifier for the code;
  - b. The module or other hardware which contains the code;
  - c. A description of the code;
  - d. The conditions which result in the code being set; and
  - e. The tools, software, and procedures required to download the code.

ZF Response to NHTSA IR 5 [CONFIDENTIAL]:

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

- 6. Furnish ZF's assessment of the alleged defect in the subject component, including:**
- a. The causal or contributory factor(s);**
  - b. The failure mechanism(s);**
  - c. The failure mode(s);**
  - d. Any prior safety recalls ZF has issued to address EOS related failures of the subject ACU.**
  - e. The risk to motor vehicle safety that it poses.**

ZF Response to NHTSA IR 6 [CONFIDENTIAL]:

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ZF has marked the information submitted in response to these requests confidential and has submitted them with a request for confidential treatment to the Office of Chief Counsel pursuant to 49 CFR part 512.

Sincerely,

/s/ *Scott B. Paxton*

Scott B. Paxton  
ZF Group, Legal Regulatory Counsel

Enclosures: 2022.06.30 ZF Response to NHTSA IR 1 and 2 – REQUEST NUMBER ONE  
DATA, marked Confidential