

"INFORMATION Redacted PURSUANT TO THE FREEDOM OF INFORMATION ACT (FOIA), 5 U.S.C. 552(b)(6)"



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July 20, 2021

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

Dear Mr. Ridella:

Subject: RQ19-005: NEF-103mjy

The Ford Motor Company (Ford) response to the Agency's letter (received June 3, 2021) concerning reports of allegations of door(s) failing to latch properly and/or inadvertently open in certain model year 2011-2014 Ford Fiesta and 2013-2014 Ford Fusion and Lincoln MKZ vehicles not within the scope of the subject recalls 15V-246, 16V-643, and 17V-210 produced with a C1A door latch without the "bridged" latch spring retainer post.

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

Sincerely,

DocuSigned by:
[REDACTED]

Desi Ujkashevic

Attachement

FORD MOTOR COMPANY (FORD) RESPONSE TO RQ19-005

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).

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 information and documents dated up to and including June 3, 2021, 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.

The agency defined "Subject Vehicles" as "All vehicles that 1) were not within the scope of the Subject Recalls (defined below), and 2) utilized the Subject Component (defined below), and 3) were manufactured for sale or lease in the United States, including, but not limited to, the District of Columbia, and current U.S. territories and possessions."

The agency defined the "Subject Recalls" as "NHTSA Safety Recalls 15V-246, 16V-643 and 17V-210."

The agency defined the "Subject Component" as "All door latches that are of the same or similar design type (the C1A design type) that were recalled under the Subject Recalls (i.e., the latches that do not have a 'bridged' latch spring retainer post)."

Request 1

State, by model and model year, the number of subject vehicles Ford has manufactured for sale or lease in the United States. Separately, for each subject vehicle manufactured to date by Ford, state the following:

- a. Vehicle identification number (VIN);
- b. Make;
- c. Model;
- d. Model Year;
- e. Subject component part number and design version installed as original equipment;
- f. Vehicle's production exterior paint color;
- g. Date of manufacture;
- h. Date warranty coverage commenced; and
- i. The State in the United States where the vehicle was originally sold or leased (or delivered for sale or lease).

Provide the table in Microsoft Access 2010, or a compatible format, entitled "PRODUCTION DATA."

Answer

The number of subject vehicles sold in the United States (the 50 states and the District of Columbia), protectorates, and territories (American Samoa, Guam, Northern Mariana Islands, Puerto Rico, and Virgin Islands) by model and model year is shown below:

Model	2014 MY	2015 MY	2016 MY
Fiesta	38874	31428	
Fusion	206115	215336	21204
MKZ	21340	23991	2924

The data requested in subparts "a" through "i" is provided in Appendix A.

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 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. For items "e/f" and "f, / 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.

Answer

For purposes of identifying reports of incidents that may be related to the alleged defect and any related documents, Ford has gathered "owner reports" and "field reports" maintained by Ford Customer Service Division (FCSD), and claim and lawsuit information maintained by Ford's Office of the General Counsel (OGC).

Descriptions of the FCSD owner and field report systems and the criteria used to search each of these are provided in Appendix B.

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

Category	Definition
A1	Allegation of door open while driving
A2	Allegation of a door that will not close and/or hard to close

Owner Reports: Records identified in a search of the Global Contact Center Technology (GCCT) database, as described in Appendix B, were reviewed for relevance, and sorted in accordance with the categories described above. The number and copies of relevant owner reports identified in this search for the alleged defect are provided in the GCCT portion of the database contained in Appendix C. The categorization of each report is identified in the "Category" field.

When we were able to identify that responsive (i.e., not ambiguous) duplicate owner reports for an alleged incident were received, each of these duplicate reports was marked accordingly, and the group counted as one report. In some cases, certain vehicles may have experienced more than one incident and have more than one report associated with their VINs. These reports have been counted separately.

Field Reports: Records identified in a search of the Common Quality Indicator System (CQIS) database, as described in Appendix B, were reviewed for relevance, and sorted in accordance with the categories described above. The number and copies of relevant field reports identified in this search with an allegation of the defect in a subject vehicle are provided in the CQIS portion of the database contained in Appendix C. The categorization of each report is identified in the "Category" field.

VOQ Data: The agency identified 187 VOQs with the information request related to vehicles outside of the scope of previous door latch recalls. Ford reviewed the records for responsiveness, and 108 were related to a door that would not latch and/or came unlatched while driving for the subject vehicles as defined above.

Of the remaining 79 non-responsive VOQs:

Five were previously repaired under 15S16 or 16S30 and fall under the scope of the 20S30 safety recall.

Three are related to locking/unlocking concerns, and are non-responsive for a door that will not latch and/or unlatch while driving

35 are related to latching concerns on vehicles that utilize a different latch architecture from the C1A and are not susceptible to the pawl spring tab fracture defect and are out of the scope of this request.

23 are related to latching concerns on vehicles that utilize the updated C1A latch with the "bridge" design for the pawl spring tab and are out of the scope of this request.

13 are missing the VIN. Ford is unable to determine if these vehicles fall within the subject vehicle population and/or investigate allegations pertaining to these vehicles without the VIN. As a result, Ford is unable to definitively determine if these are responsive.

All VOQs provided as part of this request are categorized in Appendix E.

Crash/Injury/Fatality Incident Claims: Ford identified two reports of accidents, one report of property damage, and two reports physical injury pertaining to the alleged defect in subject vehicles. There were no reports of alleged fire or fatalities pertaining to the alleged defect in subject vehicles.

Claims, Lawsuits, and Arbitrations: For purposes of identifying incidents that may relate to the alleged defect in a subject vehicle, Ford has gathered claim and lawsuit information maintained by Ford's OGC. Ford's OGC is responsible for handling various legal matters, including product liability lawsuits, claims, and consumer breach of warranty lawsuits and arbitrations against the Company.

Lawsuits and claims gathered in this manner were reviewed for relevance and categorized in accordance with the categories described above.

We are providing the requested detailed information, where available, on the responsive claims in our Log of Lawsuits and Claims, provided in Appendix D.

Request 3

Separately, for each item (complaint, report, claim, notice, or matter) within the scope of your response to Request No. 2, state the following information:

- a. Ford's file number or other identifier used;
- b. The category of the item, as identified in Request No. 2 (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. Complaint door location;

- g. Vehicle's mileage at time of incident;
- h. Incident date;
- i. Report or claim date;
- j. Allegations that the door opened while driving;
- k. Whether a crash is alleged;
- l. Whether a fire is alleged;
- m. Whether property damage is alleged;
- n. Number of alleged injuries, if any; and
- o. Number of alleged fatalities, if any;

Provide the table in Microsoft Access 2010, or a compatible format, entitled "REQUEST NUMBER TWO DATA."

Answer

Ford is providing owner and field reports in the database contained in Appendix C in response to Request 2. To the extent information sought in Request 3 is available for owner and field reports, it is provided in the database. To the extent information sought in Request 3 is available for lawsuits and claims, it is provided in the Log of Lawsuits and Claims provided in Appendix D.

Request 4

Produce copies of all documents related to each item within the scope of Request No. 2 that involve an allegation of inadvertent door opening while driving, crash, property damage, injury, or fatality (i.e., items 'j' through 'o' above). Organize the documents separately by category (i.e., consumer complaints, field reports, etc.) and describe the method Ford used for organizing the documents. Describe in detail the search methods and search criteria used by Ford to identify the items in response to Request No. 2.

Answer

Ford is providing documents related to owner and field reports in the database contained in Appendix C in response to Request 2. To the extent information sought in Request 4 is available for lawsuits and claims, it is provided in Appendix D. To the extent available, copies of complaints, first notices, or GCCT reports relating to matters shown on the log are provided in Appendix D. With regard to these lawsuits and claims, Ford has not undertaken to contact outside law firms to obtain additional documentation.

Detailed descriptions of the search methods and criteria, including all pertinent parameters, used to identify the items provided in response to Request 2 are described in Appendix B.

Request 5

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, are being conducted, are planned, or are being planned by, or for, Ford. This should include Ford's '14D' for recall 20V-177. 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

Based on the agreement between NHTSA and Ford, the response to this request will be submitted to the agency no later than August 18, 2021.

Request 6

Furnish Ford's assessment of the alleged defect in the subject vehicle, including:

- a. The casual or contributory factor(s);
- b. The failure mechanism(s);
- c. The failure mode(s);
- d. The risk to motor vehicle safety that it poses;
- e. What warnings, if any, the operator and the other persons both inside and outside the vehicle would have that the alleged defect was occurring, or subject component was malfunctioning;
- f. The reports included with this inquiry; and
- g. That recall 20V177 (20S15), a regional recall campaign being conducted in combination with a regional non-safety field action (i.e., a proactive customer satisfaction program), is comprehensive, effective, and appropriate.

Answer

In 2014 Ford began investigating reports of doors opening while driving on Ford Fiesta vehicles. Subsequently, NHTSA opened investigation PE14-028 to investigate claims of doors failing to latch and/or inadvertently opening on 2011-2013 Ford Fiesta Vehicles. The failure mechanism was found to be the latch pawl spring tab fracturing. In 2015 the investigation was expanded to include Ford Fusion and Lincoln MKZ vehicles produced with the same door latch. This investigation identified an elevated number of reports for vehicle produced from 02/01/2012 through 05/31/2013 equipped with latches produced at Kiekert Mexico. As a result of this investigation, Ford issued safety recall 15V-246 (15S16).

In 2017, NHTSA contacted Ford regarding elevated rates of Vehicle Owner Questionnaires (VOQs) associated with vehicles built shortly after the vehicle population included in 15V-246. Ford's subsequent investigation identified elevated report rates on vehicles produced after 05/31/2013. Ford's investigation found that the spring leg angle variations caused increased stresses on the pawl spring tab, which could lead to pawl spring tab fracture. Kiekert records indicated that corrections to the pawl return spring occurred in door latches produced beginning in mid-September 2013, which reached Ford assembly plants in late-September to

early-October 2013. This quality correct action increased control of the pawl spring leg angle. Ford's review of field data identified a marked reduction in report rates for vehicles produced in October 2013 from those produced in September 2013. As a result of this investigation, Ford issued safety recall 17V-210 (15S16) for vehicles produced from 05/31/2013 through 10/31/2013.

In 2019, NHTSA contacted Ford regarding elevated rates of VOQs associated with Fusion, MKZ, and Fiesta vehicles built outside of safety recalls 15V-246 and 17V-210. Ford's investigation into this inquiry indicated elevated report rates on vehicles built in "hot states". Of the 51 VOQs supplied by NHTSA, 45 originated from "hot states".

The factors that cause the condition were identified during FEA analysis, which indicated the design of the latch pawl spring tab employed in the subject vehicles was unable to withstand the stress applied at high ambient temperatures. Specifically, the pawl spring tab design did not account for proper radii of corners/fillets and additional material to prevent premature surface fracture. Field data confirmed that high temperature was a contributory factor in the spring tab fracture. While durability testing at Kiekert includes high temperature cycles (80°C), it does not include the duration required to exhibit this condition.

Kiekert introduced an improved "bridge design" in production on the Fiesta 12/5/2014 and on the Fusion/MKZ on 04/28/2015. This design reduced stress on the pawl spring tab by 50% and demonstrated higher performance during high temperature testing with no failures.

As a result of this investigation and analysis, Ford issued a regional safety recall 20V-177 (20S15) for Fiesta vehicles produced from 11/1/2013 through 12/4/2014, and for Fusion/MKZ vehicles produced from 11/1/2013 through 04/27/2015 that are or have been previously registered in "hot states". Hot states are defined as AL, AR, AZ, CA, FL, GA, HI, LA, MS, NM, NV, OK, OR, SC, TX, UT, WA, EMS Fed and other Territories. A regional proactive customer satisfaction program (20R01) was issued for vehicles produced during the defined build period, but not originally sold or currently registered in a "hot state".

A door latch with a fractured pawl spring tab typically results in a condition whereby the door will not latch closed. In the event that the customer is able to latch the door, there is potential that the door may unlatch while driving, increasing the risk of injury to the operator and/or vehicle occupants. The operator and other vehicle occupants would be notified that this defect is occurring by a door that will not latch or "bounce back" when attempting to close. A door that becomes unlatched while driving may be accompanied by a "door ajar" indicator light, chime, dome light illumination, and/or increased wind noise.

As of 06/03/2021, Ford has received a total of 1610 reports of doors that will not close and/or unlatch while the vehicle is in motion for the defined population. While only about 33% of the vehicles produced during this time period were sold in "hot states", over 83% of the claims originate from "hot states". Ford has continued to review warranty return parts for latches produced with the improved "bridge design", and as of 06/03/2021 have not identified any latches with a fractured pawl spring tab. As of March 23, 2020, Ford has implemented a proactive field action for every vehicle produced with a "C1A" latch without the "bridge design" spring pawl tab. The field report data supports Ford's stance that the 20V-177 regional safety field action is comprehensive, effective, and appropriate.