



Desi Ujkashevic, Global Director
Automotive Safety Office
Sustainability, Environment & Safety Engineering

Fairlane Plaza South, Suite 500
330 Town Center Drive
Dearborn, MI 48126-2738

August 18, 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) amended 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,

A black rectangular redaction box covering the signature of Desi Ujkashevic.

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 response to Request 1 was provided to the agency in Appendix A on July 20, 2021.

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

The response to Request 2 was provided to the agency on July 20, 2021.

On August 5, 2021, the agency requested additional information related to the following Concern Driven Reporting Source Systems:

- CDR-GCQIS
- CDR-GQRS
- CDR-MGQRS

Descriptions of these source systems and the criteria used to search each of these are provided in Appendix B.

On August 5, 2021, the agency requested definitions of certain category codes related to VOQ reports provided on July 20, 2021. Definitions of those category codes are below:

Category	Definition
A4	Allegation missing child lock
B1	Allegation of a door that will not lock or unlock
B2	Allegation of a "Door Ajar" light with latched door
C	Non-Responsive Claims

On August 5, 2021, the agency requested an update to the VOQs to include VIN numbers previously provided to Ford, but not included in Ford's July 20, 2021 response. The results of this update are provided in Appendix E and summarized below.

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 109 were related to a door that would not latch and/or came unlatched while driving on a subject vehicle as defined above.

Of the remaining 78 non-responsive VOQs:

Eight 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

34 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.

31 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.

One is missing the VIN. Ford is unable to determine if this vehicle falls within the subject vehicle population and/or investigate allegations pertaining to this vehicle without the VIN. As a result, Ford is unable to definitively determine if this is responsive.

One has an incomplete VIN. Ford is unable to determine if this vehicle falls within the subject vehicle population and/or investigate allegations pertaining to this vehicle without the VIN. As a result, Ford is unable to definitively determine if this is responsive.

An updated list of all VOQs provided as part of this request is in Appendix E.

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

The response to Request 3 was provided to the agency on July 20, 2021.

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

The response to Request 4 was provided to the agency on July 20, 2021.

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

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 F.

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 G with a request for confidentiality in a separate file transfer to the agency's Office of the Chief Counsel pursuant to 49 CFR Part 512. Redacted copies of the confidential documents are also provided in Appendix G and are labeled "Public."

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.

Ford is not producing documents responsive to this request that are protected from disclosure by attorney-client privilege, work-product doctrine, or other applicable immunity. Documents protected from disclosure on these bases are described in a privilege log contained in Appendix H.

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

The response to Request 6 was provided to the agency on July 20, 2021.