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

UNITED STATES DEPARTMENT OF TRANSPORTATION
NATIONAL HIGHWAY TRAFFIC SAFETY ADMINISTRATION
1200 New Jersey Avenue SE
Washington, DC 20590

In re:	)
	)
RQ21-002	)
Ford Motor Company	)
	)

SPECIAL ORDER DIRECTED TO FORD MOTOR COMPANY

To:
Ms. Desi Ujkashevic
Global Director, Automotive Safety Engineering Office
Ford Motor Company
330 Town Center Drive, Suite 400
Dearborn, MI 48126
dujkashe@ford.com

This Special Order is issued by the National Highway Traffic Safety Administration (NHTSA), an Operating Administration of the United States Department of Transportation, pursuant to 49 U.S.C. § 30166(g)(1)(A) and 49 C.F.R. §§ 510.7-510.8.[1]

On July 7, 2020, NHTSA's Vehicle Research and Testing Center (VRTC), located in East Liberty, Ohio, informed the Office of Defects Investigation (ODI) of a trend of Model Year (MY) 2020 Ford Escape vehicles, manufactured by Ford Motor Company (Ford), with rearview camera malfunctions. The rearview camera malfunctions potentially caused a noncompliance with the requirements of Federal Motor Vehicle Safety Standard (FMVSS) No. 111, *Rear visibility*. 49 C.F.R. § 571.111.

[1] *See* 49 C.F.R. §§ 1.95, 501.8(d)(3) (delegations of authority).

NHTSA reviewed and discussed the potential noncompliance with Ford. On July 8, 2020, ODI contacted Ford and provided five (5) Vehicle Owner Questionnaires (VOQs) alleging inoperative rearview cameras.

According to Ford, during February through April 2020, Ford had identified and monitored warranty claims pertaining to intermittent or inoperative rearview cameras. Ford also stated that it was aware of the issue and it was brought to Ford's Critical Concerns Review Group (CCRG) for review on May 12, 2020.

Ford shared its investigation findings with ODI on July 15, 2020. During August 2020, ODI and NHTSA's Office of Vehicle Safety Compliance (OVSC) met with Ford to discuss seventeen (17) additional VOQs and the recall status. On or about September 23, 2020, Ford submitted a Part 573 Safety Recall Report (Part 573 Report) identified as NHTSA Recall No. 20V-575 (recall 20V-575) recalling certain 2020 Ford F-150, F-250, F-350, F-450, F-550, Explorer, Mustang, Transit, Expedition, Escape, Ranger and Edge, and Lincoln Nautilus and Corsair vehicles (the "recalled vehicles").

Ford determined a noncompliance existed with FMVSS No. 111, S6.2(b). Section S6.2(b) states:

> *Final requirements. Each multipurpose passenger vehicle, low-speed vehicle, truck, bus, and school bus with a GVWR of 4,536 kg or less manufactured on or after May 1, 2018, shall display a rearview image meeting the requirements of S6.2.1 through S6.2.7.*

49 C.F.R. § 571.111, S6.2(b).

Ford's Part 573 Report identified 620,246 potentially affected MY 2020 Ford vehicles and estimated that 47% of the vehicles had the noncompliance. According to the description in the Part 573 Report, the noncompliance was due to "insufficient electrical conductivity within

the printed circuit board (PCB) internal to the camera leads to intermittent rearview camera operation."

Ford described the risk in the Part 573 Report as: "A rearview camera that intermittently displays a blank or distorted image does not comply with the requirements of FMVSS 111 and can reduce the driver's view of what is behind the vehicle, increasing the risk of a crash."

NHTSA opened a Recall Query (RQ) to investigate the timeliness and scope of Ford's recall 20V-575, and Ford's compliance with reporting requirements. To that end, NHTSA hereby requires that Ford file certain reports and answers to questions under oath, and produce certain documents.

Ford's response to this Special Order must be provided to NHTSA's Office of Chief Counsel by October 5, 2021. The response should be sent to Ashley Simpson, Office of Chief Counsel, at Ashley.Simpson@dot.gov or, for large submissions, through the DOT Secure Large File Transfer Solution system.[2]

Ford's response must be signed under oath, *i.e.,* accompanied by a declaration, signed by a responsible officer of Ford, stating that he/she has undertaken and directed an inquiry reasonably calculated to assure that the answers and production of documents are complete and correct, that he/she has caused the documents of Ford to be searched diligently for information and documents responsive to this Special Order and produced them to NHTSA, and that the answers to the inquiries provided to NHTSA respond completely and correctly to this Special Order. 28 U.S.C. § 1746; 49 U.S.C. § 30166(g)(1)(A); 49 C.F.R. § 510.7.

Failure to respond fully or truthfully to this Special Order may result in a referral to the United States Department of Justice for a civil action to compel responses, and may subject Ford

[2] In order to use the File Transfer System, please email Ashley.Simpson@dot.gov for a link.

to civil penalties of up to $22,992 per day, up to a maximum penalty of $114,954,525 for a related series of daily violations. 49 U.S.C. §§ 30163(a)(1), 30165(a)(3); 49 C.F.R. § 578.6(a)(3). Falsifying or withholding information in response to this Special Order may also lead to criminal penalties of a fine or imprisonment of up to 15 years, or both. 49 U.S.C. § 30170(a)(1).

DEFINITIONS

Unless otherwise stated in the text, the following definitions apply to the information request set forth below:

- **Alleged noncompliance:** Any potential noncompliance with FMVSS No. 111 (49 C.F.R. § 571.111), including any failure to meet section S6.2 (failure to meet the rearview image field of view requirements).

- **Consumer complaint**: A "consumer complaint" is defined as a communication of any kind made by a consumer (or other person) to or with a manufacturer addressed to the company, an officer thereof, or an entity thereof that handles consumer matters, a Ford Motor Company website that receives consumer complaints, an electronic mail system that receives such information at the corporate level, or that are otherwise received by a unit within Ford Motor Company that receives consumer inquiries or complaints, including complaints or allegations received through litigation, mediation, or arbitration, telephonic complaints, expressing dissatisfaction with a product, or relating the unsatisfactory performance of a product, or any actual or potential defect or noncompliance in a product, or any event that allegedly was caused by any actual or potential defect or noncompliance in a product.

- **Document:** "Document(s)" is used in the broadest sense of the word and shall mean all original written, printed, typed, recorded, or graphic matter whatsoever, however produced or reproduced, of every kind, nature, and description, and all non-identical copies of both sides thereof, including, but not limited to, papers, letters, memoranda, correspondence, communications, electronic mail (e-mail) messages (existing in hard copy and/or in electronic storage), faxes, mailgrams, telegrams, cables, telex messages, notes, annotations, working papers, drafts, minutes, records, audio and video recordings, data, databases, other information bases, summaries, charts, tables, graphics, other visual displays, photographs, statements, interviews, opinions, reports, newspaper articles, studies, analyses, evaluations, interpretations, contracts, agreements, jottings, agendas, bulletins, notices, announcements, instructions, blueprints, drawings, as-builts, changes, manuals, publications, work schedules, journals, statistical data, desk, portable and computer calendars, appointment books, diaries, travel reports, lists, tabulations, computer printouts, data processing program libraries, data processing inputs and outputs,

microfilms, microfiches, statements for services, resolutions, financial statements, governmental records, business records, personnel records, work orders, documents generated through litigation, arbitration, or mediation, pleadings, mediation statements, discovery in any form, affidavits, motions, responses to discovery, all transcripts, administrative filings and all mechanical, magnetic, photographic and electronic records or recordings of any kind, including any storage media associated with computers, including, but not limited to, information on hard drives, floppy disks, backup tapes, and zip drives, electronic communications, including but not limited to, the Internet and shall include any drafts or revisions pertaining to any of the foregoing, all other things similar to any of the foregoing, however denominated by Ford Motor Company, any other data compilations from which information can be obtained, translated if necessary, into a usable form and any other documents. For purposes of this request, any document which contains any note, comment, addition, deletion, insertion, annotation, or otherwise comprises a non-identical copy of another document shall be treated as a separate document subject to production. In all cases where original and any non-identical copies are not available, "document(s)" also means any identical copies of the original and all non-identical copies thereof. Any document, record, graph, chart, film or photograph originally produced in color must be provided in color. Furnish all documents whether verified by Ford Motor Company or not. If a document is not in the English language, provide both the original document and an English translation of the document.

- **Entity (Ford Motor Company):** "Ford" or "you" means Ford Motor Company, all other aliases, and all of its/their past and present officers and employees, and representatives that have safety-related information, whether assigned to its/their principal offices or any of its/their field or other locations, including all of its/their divisions, subsidiaries (whether or not incorporated) and affiliated enterprises and all of their headquarters, regional, zone and other offices and their employees, and all agents, contractors (*e.g.*, test facilities that conduct compliance tests), consultants, attorneys and law firms and other persons engaged directly or indirectly (*e.g.*, employee of a consultant) by or under the control of Ford Motor Company (including all business units and persons previously referred to), who are or, in or after insert retroactive date, were involved in any way with any of the following related to the alleged noncompliance in the subject vehicles:
  (a) design, analysis, modification or production;
  (b) testing, assessment, or evaluation;
  (c) regulatory certification and/or compliance determination with FMVSS No. 111;
  (d) sales of the Ford Motor Company vehicles or other similar vehicles;
  (e) Consideration, or recognition of potential or actual defects or noncompliances with applicable FMVSS, reporting, record-keeping and information management, (*e.g.,* complaints, field reports, warranty information, part sales), analysis, claims, or lawsuits, mediations, or arbitrations; or
  (f) Communication to, from or intended for zone representatives, fleets, dealers, or other field locations, including but not limited to people who have the capacity to obtain information from dealers.

- **Rearview camera issue:** Any instance where the rearview camera displays a blank or distorted image or otherwise fails to display an image of the area behind the vehicle when reverse gear is selected in the subject vehicles.

- **Subject vehicles:** All Ford Motor Company vehicles 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 with rearview cameras from the same supplier as the recalled vehicles for model years 2013 to present.

- **Other Terms:** To the extent that they are used in these information requests, the terms "claim," "dealer field report," "field report," "fire," "fleet," "good will," "make," "model," "model year," "notice," "property damage," "property damage claim," "rollover," "type," "warranty," "warranty adjustment," and "warranty claim," whether used in singular or in plural form, have the same meaning as found in 49 C.F.R. § 579.4.

INSTRUCTIONS

Please follow the instructions below when providing responses to the numbered information requests in the next section.

1. Your response to the Special Order shall be sent to Office of the Chief Counsel (NCC-100), National Highway Traffic Safety Administration by email to Ashley Simpson at Ashley.Simpson@dot.gov or through the DOT Secure Large File Transfer Solution system.[3]

2. Please repeat the applicable request verbatim above your response. After your response to each request, identify the source of the information and indicate the last date the information was gathered.

3. When documents are produced and the documents would not, standing alone, be self-explanatory, the production of documents shall be supplemented and accompanied by explanation. Please also be reminded that where a document responsive to a request is not in the English language, both the original document and an English translation of the document must be produced.

[3] In order to use the File Transfer System, please email Ashley.Simpson@dot.gov for a link.

4. You are required to respond to every request listed in this Special Order. If you cannot respond to any specific request or subpart(s) thereof, please state the reason why you are unable to do so. If you are unable to respond because you do not have all or any of the precise information needed to respond, provide an estimate. If, on the basis of attorney-client, attorney work product, or other privilege, you do not submit one or more requested documents or items of information in response to this Special Order, you must provide a privilege log identifying each document or item withheld, and stating the date, subject or title, name and position of the person(s) from, and the person(s) to whom it was sent, and the name and position of any other recipient (to include all carbon copies or blind carbon copies), the nature of that information or material, and the basis for the claim of privilege and why that privilege applies.

5. After your response to each request, state whether you previously had any responsive documents that are no longer within your possession, custody, or control, including but not limited to because the documents were lost or destroyed. If such documents ever existed: describe the documents; identify the reason that the documents are no longer in your possession, custody, or control; identify the date that you last had the documents; and identify who may have copies of such documents.

6. If you claim that any of the information or documents provided in response to this Special Order constitutes confidential commercial material within the meaning of 5 U.S.C. § 552(b)(4), or is protected from disclosure pursuant to 18 U.S.C. § 1905, you must submit supporting information together with the materials that are the subject of the confidentiality request, in accordance with 49 C.F.R. Part 512, to the Office of Chief Counsel (NCC-100), National Highway Traffic Safety Administration as instructed below.

7. To facilitate social distancing due to COVID-19, NHTSA is treating electronic submission as an acceptable method for submitting confidential business information (CBI) to the agency under 49 C.F.R. Part 512.[4] Since Part 512 submissions are handled by NHTSA's Office of Chief Counsel, any Part 512 submission should be sent to the Office of Chief Counsel electronically. Specifically, any CBI submissions sent via email should be sent to Ashley Simpson at Ashley.Simpson@dot.gov. For CBI submissions via a secure file transfer application, Ashley Simpson (Ashley.Simpson@dot.gov) must be notified when files are submitted and have access to retrieve the submitted files. Please refer to RQ21-002 in your response to this letter and in the subject line of any confidentiality request submitted to the Office of Chief Counsel.

At this time, regulated entities should not send a duplicate hardcopy of their electronic CBI submissions to DOT headquarters. Please note that these modified submission procedures are only to facilitate continued operations while maintaining appropriate social distancing due to COVID-19. Regular procedures for Part 512 submissions will resume upon further notice, when NHTSA and regulated entities discontinue operating primarily in telework status.

For questions about CBI issues, including these modified submission procedures, please contact Dan Rabinovitz in the Office of Chief Counsel at Daniel.Rabinovitz@dot.gov or 202-366-8534.

8. All documents shall be produced electronically, as described below, in a common format (*e.g.*, Word, PDF, Microsoft Access) or other electronic formats commonly used by Ford and discernable to NHTSA.

[4] *See* https://www.nhtsa.gov/coronavirus/submission-confidential-business-information.

a. Hard copy documents shall be imaged in PDF format. They shall be provided as multi-page PDFs with document level optical character recognition (OCR).

b. Electronically Stored Information (ESI) shall be converted to multi-page PDFs and produced along with document level OCR/extracted text.

c. You shall organize the documents as instructed in the request to which it responds or, if no instruction is given in a request, in chronological order by project, report, or other similar categorization responsive to that numbered request.

d. After the documents are so organized, and in sequential order to the request to which each responds, you shall apply Bates Numbers to the entire production.

e. You shall produce an index that lists the title of each document produced, the Bates Numbers on the document, and the request to which it corresponds.

9. When a request calls for a detailed, narrative response, do not identify business records or other documents in lieu of providing a written narrative. A response to a request for a written narrative that solely directs NHTSA to documents will be considered non-responsive, and may result in civil penalties. 49 U.S.C. §§ 30163(a)(1), 30165(a)(3); 49 C.F.R. § 578.6(a)(3). A response to a request for a detailed, narrative response that includes references to specific Bates Number(s) in addition to a written narrative will not be considered a violation of this Instruction.

10. The singular includes the plural; the plural includes the singular. The masculine gender includes the feminine and neuter genders; and the neuter gender includes the masculine and feminine genders. "And" as well as "or" shall be construed either disjunctively or conjunctively, to bring within the scope of this Special Order all responses that might otherwise be construed to be outside its scope. "Each" shall be construed to include "every" and "every"

shall be construed to include "each." "Any" shall be construed to include "all" and "all" shall be construed to include "any." The use of a verb in any tense shall be construed as the use of the verb in a past or present tense, whenever necessary to bring within the scope of the document requests all responses which might otherwise be construed to be outside its scope.

11. Ford's response to this Special Order must be under oath, *i.e.,* accompanied by an declaration, signed by a responsible officer of Ford, stating that he/she has undertaken and directed an inquiry reasonably calculated to assure that the answers and production of documents are complete and correct, that he/she has caused the documents of Ford to be searched diligently for information and documents responsive to this Special Order and produced them to NHTSA, and that the answers to the inquiries provided to NHTSA respond completely and correctly to this Special Order.

12. The requests in this Special Order are deemed to be continuing in nature so as to require additional or amended responses from you should you obtain or become aware of any new, additional, or differing responsive information or documents.

REQUESTS

1. Separately provide the production volume for Ford models that have the Magna rearview camera part number 19G490, but were not included in recall 20V-575.

2. Provide a detailed narrative explanation for the basis of Ford's statement in its Part 573 Report for recall 20V-575 that the estimated percent of the recall population with the defect is 47%.

3. Provide a detailed narrative, including a timeline, that includes when Ford first learned of the rearview camera displaying a blank or distorted image (the "rearview camera issue") or the alleged noncompliance, how Ford learned of the rearview camera issue/alleged

noncompliance, who first learned of the rearview camera issue/alleged noncompliance, and what such person(s) did with the information. The narrative should also include details relating to receiving of warranty claims related to the rearview camera issue/alleged noncompliance, the receiving of VOQs related to the rearview camera issue/alleged noncompliance, the beginning of the investigation into the rearview camera issue/alleged noncompliance, the beginning of the review of the warranty claims related to the rearview camera issue/alleged noncompliance, the compliance testing performed in 2020 to understand impact of rearview camera issue, and the filing of a Part 573 Safety Recall Report with NHTSA.

4. List each date between the start of production for MY 2013 Ford vehicles to present on which Ford's CCRG and/or Field Review Committee (FRC) discussed an actual or potential rearview camera safety-related defect or noncompliance with FMVSS 111 for any Ford model types. For each date listed, provide a detailed explanation of the discussion and provide a copy of any presentation materials and any meeting notes.

5. Separately, for the subject vehicles and the subset of the subject vehicle population recalled in recall 20V-575, provide a detailed narrative of Ford's interaction with the supplier of the review cameras, Magna Electronics, for any model year, during the period from the beginning of MY 2013 production to present, regarding the "rearview camera issue"/alleged noncompliance, including data or information received from the supplier, communications between Ford and the supplier regarding the "rearview camera issue"/alleged noncompliance, including warranty claims or agreements, root cause analysis, or other examinations, investigations, internal and/or external audits, assessments, analyses, tests, test results, studies, surveys, simulations, investigations, inquiries and/or evaluations performed by or on behalf of

the supplier relating to the rearview camera issue/alleged noncompliance. Your response should identify the personnel at Ford and the supplier that had such interactions.

6. Provide copies of any and all documents regarding communications between Ford and Magna Electronics relating to the following:

   a. Any problems, corrections, changes or alterations, malfunctions, or other concerns relating to any component included in the rearview camera of any Ford production line(s) during the period from the beginning of MY 2013 production to present; and

   b. The rearview camera not working/failing, freezing, poor feed or image quality, image distortions and the like, or that refer or relate to the alleged noncompliance.

7. In its chronology for recall 20V-575, Ford stated that "February – April 2020 – Ford identified and monitored warranty claims pertaining to intermittent or inoperative rearview cameras. Ford reviewed supplier product changes, focusing on changes introduced by the supplier in the October/November 2019 timeframe." Answer the following:

   a. Provide a detailed narrative of the methodology used to identify and monitor warranty claims, stating how and what warranty claims were identified and monitored, time period looked at, and whether only claims for MY 2020 vehicles were reviewed.

   b. Provide a narrative response why Ford focused on changes introduced by the supplier in the October/November 2019 timeframe.

   c. Provide a narrative response on whether Ford reviewed any other supplier changes in a time frame other than October/November 2019 as a potential cause relating to intermittent or inoperative rearview cameras or noncompliance with

FMVSS 111. If so, describe what was reviewed and when. If not, provide a narrative response why other changes were not evaluated.

8. Ford's recall 20V-575 chronology also stated:

"May – August 2020: The issue was brought to Ford's Critical Concerns Review Group (CCRG) for review on May 12, 2020. The CCRG considered the requirements of FMVSS 111 – Rear Visibility, which requires the display of a "field of view" of certain objects rearward of the vehicle upon the initiation of a backing event. The CCRG reviewed the manufacturing plant's inspection procedures for rearview cameras and learned that every vehicle is checked for a rearview image at the vehicle's respective manufacturing plant. The CCRG directed FMVSS No. 111 compliance testing be performed on 9 vehicles and concluded that all vehicles met the requirements. As this concern covered multiple vehicle lines with different failure rates, the CCRG also investigated the different vehicle layouts to understand any differences that could exist among the vehicles. Ford summarized its CCRG investigation and discussed these results with NHTSA."

Answer the following:

a. The Part 573 references several plants where the recalled part was introduced into production. Specifically identify which "manufacturing plant's inspection procedures" was checked.

b. Separately, provide copies of the inspection procedures relating to rearview cameras from May 1, 2016 to present that were in effect at any of Ford manufacturing plant or supplier manufacturing plant.

c. Specifically identify how Ford "learned that every vehicle is checked for a rearview image at the vehicle's respective manufacturing plant." Provide a narrative description of all of Ford's actions to check the accuracy of this statement.

d. Provide all test reports, even if the report was considered a non-test, a failure, or otherwise invalid, relating to FMVSS No. 111 or rear camera performance on the nine vehicles mentioned above.

e. Provide a detailed narrative of the efforts that CCRG took to "investigate[] the different vehicle layouts to understand any differences that could exist among the vehicles," including what models and model years were evaluated and the results of such investigation.

f. Ford's Part 573 Report states that the affected parts involved in recall 20V-575 were taken out of production in May and June of 2020. Please provided a detailed narrative as to why each part was taken out of production at the time the parts were taken out of production at each assembly plant, what part was used to replace it in production going forward, and an explanation why Ford did not make a safety-related defect or noncompliance determination in May or June 2020.

g. Provide a detailed narrative of why Ford did not make a determination that the subject vehicles contained a safety-related defect and/or did not make a determination that a noncompliance with FMVSS 111 existed in the subject vehicles prior to the Field Review Committee's September 16, 2020 noncompliance determination for the subset of subject vehicles in the recall population of recall 20V-575. In particular, explain why Ford did not determine that a noncompliance or safety-related defect existed when the failing cameras were taken out of production for the various models of the subject vehicles as described in Ford's September 23, 2020 Part 573 Report. For each of the subset of subject vehicle models recalled in recall 20V-575, provide the number of vehicles sold as of the date that the failing camera was removed from production.

h. Provide a detailed narrative of why NHTSA's July 8, 2020 notification was not included in Ford's Part 573 chronology for recall 20V-575.

9. Ford's chronology also stated: "September 2020 – Ford updated its analysis to include newer claims of rearview camera replacements. Specifically, the CCRG focused on the updated rates of failure that were reported on the dealer lots at 0 days in service." Answer the following:

    a. Provide a detailed narrative of Ford's analysis, including what models and model years were evaluated, and the results of such investigation.

    b. Separately, by model and model year, state the number and rates of failure reported at 0 days in service.

10. State separately the number of each of the following for the subject vehicles and the subset of the subject vehicles recalled in recall 20V-575, received by Ford, or of which Ford is otherwise aware, which relate to, or may relate to the alleged noncompliance or failure of the rearview camera to display an image of the area behind the vehicle when reverse gear is selected in the subject vehicles:

    a. Consumer complaints, including those from field 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, mediations, or arbitrations, both pending and closed, in which Ford is or was a defendant, codefendant, or respondent.

    h. 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).

i. Describe in detail the search methods and search criteria used by Ford to identify the items in response to this Request.

11. Provide a table that states, separately, for each item (complaint, report, claim, notice, or matter) in the subject population and the subset of the subject population recalled in recall 20V-575 within the scope of your response to Request No. 10, the following information:

a. Ford's file number or other identifier used;

b. The category of the item, as identified in Request No. 10 (*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 model and model year;

f. Vehicle's mileage at time of incident;

g. Incident date;

h. Report or claim date;

i. Whether the number of days in service was zero;

j. Whether a crash is alleged;

k. Whether property damage is alleged;

l. Number of alleged injuries, if any;

m. Number of alleged fatalities, if any;

n. For Request 10, items "c" through "g," 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;

o. Caption of associated legal proceeding(s), including mediations and arbitrations, (if applicable) including case number and party names;

p. Court or other entity where associated legal proceeding(s) was filed (if applicable);

q. Date on which associated legal proceeding(s) was filed (if applicable);

r. Resolution of associated legal proceeding(s) (if applicable); and

s. Date of resolution of associated legal proceeding(s) (if applicable).

Provide this information in Microsoft Access 2010, or a compatible format, with the title "COMPLAINT DATA" And "COMPLAINT DATA 20V-575."

12. Separately, for each item in the subject population and the subset of the subject population recalled in recall 20V-575, produce copies of all documents related to each item within the scope of Request No. 10. This shall include litigation, mediation, and arbitration documents including, but not limited to, depositions and discovery. Organize and provide the documents separately by category (*i.e.,* consumer complaints, field reports, etc.) and describe the method Ford used for organizing the documents.

13. Separately, for the subject vehicle population and the subset of the subject vehicle population recalled in recall 20V-575, provide a list of VOQs reviewed by Ford applicable to the

subject vehicles and the alleged noncompliance or rearview camera issue. Please provide the dates the VOQs were both received and reviewed by Ford.

14. Separately, for all Ford vehicles with rearview cameras provided by Magna Electronics, including the subset of the subject vehicle population recalled in recall 20V-575, list, by make, model and model year, any rearview camera issues that relate to or may relate to the alleged noncompliance or rearview camera issue in the subject vehicles that have been identified by Ford to date from the beginning of MY 2013 production to present, along with the identification number and type of the claim which identified the issue in a form substantially similar to the table below. The type of the claim includes, but is not limited to: warranty claims; extended warranty claims; claims for good will services that were provided; field, zone, or similar adjustments and reimbursements; and warranty claims or repairs made in accordance with a procedure specified in a technical service bulletin or customer satisfaction campaign.

Make	Model	MY	Failure	Identification #	Type of Claim *(e.g., warranty claim, extended warranty claim, goodwill, TSB, customer service campaign)*

15. Additionally, provide a table for the subject vehicle population and the subset of the subject vehicle population recalled in recall 20V-575, that states separately for each such claim the following information:

a. Ford's claim number;

b. Vehicle owner or fleet name (and fleet contact person), street address, email address and telephone number;

c. Vehicle's model and model year;

d. Vehicle's VIN;

e. Repair date;

f. Vehicle mileage at time of repair;

g. Repairing dealer's or facility's name, telephone number, and city and state or ZIP code;

h. Labor operation number(s) and description(s);

i. Problem code(s) and description(s);

j. Diagnostic trouble code(s);

k. Replacement part number(s) and description(s);

l. Concern stated by customer;

m. Cause as stated on the repair order;

n. Correction as stated on the repair order;

o. Additional comments, if any, by dealer/technician relating to claim and/or repair; and

p. Whether this claim was included in the material presented to NHTSA in July 2020 (Y/N).

Provide this information in Microsoft Access 2010, or a compatible format, with the title "WARRANTY DATA" And "Warranty Data 20V-575."

16. Describe in detail the search methods and search criteria used by Ford to identify the claims in response to Request No. 14, including the labor operations, problem codes, diagnostic trouble codes, part numbers and any other pertinent parameters used.

17. Separately, for the subject vehicle population and the subset of the subject vehicle population recalled in recall 20V-575, provide a list of all labor operations, labor operation

descriptions, problem codes, and problem code descriptions, diagnostic trouble codes and diagnostic trouble code descriptions applicable to the alleged noncompliance or rearview camera issue in the subject vehicles. State whether the diagnostic trouble codes are automatically reported to the warranty database electronically or manually entered into the warranty database by a claims administrator.

18. State, by model and model year, the terms of the new vehicle warranty coverage offered by Ford on the subject vehicles (*i.e.,* the number of months and mileage for which coverage is provided and the vehicle systems that are covered). Also, state any additional warranty coverage that may have been offered for the rearview cameras (*e.g.*, extended warranty, warranty to subsequent owners).

19. Separately, for the subject vehicle population and the subset of the subject vehicle population recalled in recall 20V-575, produce copies of all service, warranty, extended warranty, goodwill, and other documents that relate to, or may relate to, the alleged noncompliance or rearview camera issue in the subject vehicles, that Ford has issued to any dealers, regional or zone offices, field offices, fleet purchasers, or other entities. This includes, but is not limited to, bulletins, advisories, informational documents, training documents, or other documents or communications, with the exception of standard shop manuals. Also include the latest draft copy of any communication that Ford is planning to issue within the next 120 days. Describe in detail the search methods and search criteria used by Ford to identify the items in response to this Request.

20. Separately, for the subject vehicle population and the subset of the subject vehicle population recalled in recall 20V-575, describe in detail any internal and/or external audits, assessments, analyses, tests, test results, studies, surveys, simulations, investigations, inquiries

and/or evaluations (collectively, for this request "actions") that relate to, or may relate to, the alleged noncompliance and/or failure of the rearview camera to display an image of the area behind the vehicle with reverse gear is selected 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 action and objective of the action;

e. Engineering group(s)/supplier(s) responsible for designing and for conducting the action;

f. A brief summary of the findings and/or conclusions resulting from the action;

g. Copies of all documents related to the action, regardless of whether the documents are in interim, draft, or final form. This includes, but is not limited to, all documentation for design of experiments (including any presentations, reports, or documents related to same).

Organize the documents chronologically by action. Provide all reports, presentations, and any and all other documents that relate to an analysis of root cause or root causes of the alleged noncompliance, and state the date (MM/DD/YY or MM/YY if DD is unknown) the report, presentation, or other document was created, where possible.

21. Separately, for the subject vehicle population and the subset of the subject vehicle population recalled in recall 20V-575, provide all photographs, analysis, conclusions, and any and all other relevant documents for full or partial analyses of individual subject components

recovered from the field. Identify the subject component by the VIN number of the vehicle from which it was harvested.

22. Provide a detailed narrative of the design differences relating to the rearview camera for the remaining MY 2020 Ford vehicles that were not included in recall 20V-575, and a detailed narrative of why these vehicles were not recalled.

23. Separately, for each model and model year that contains a rearview camera certified to meet FMVSS 111, that has not been recalled, provide a detailed description of all modifications or changes made by, or on behalf of, Ford or its supplier, in the design, material composition, manufacture, quality control, supply, or installation of the rearview camera, from the beginning of MY 2013 to date, which relate to, or may relate to, the alleged noncompliance. For each such modification or change, provide the following information:

a. A detailed description of the modification or change;
b. The reason(s) for the modification or change, including the underlying rationale and purpose of the design change;
c. The individuals who participated in the decision to make the modification or change;
d. When the decision to modify or change was made;
e. The objectives of implementing the modification or change, and any follow-up study, evaluation, inquiry, investigation, analysis, and/or testing that was conducted to determine whether the change or modification accomplished or otherwise met the identified objectives;
f. The part number(s) (service and engineering) of the original component;
g. The part number(s) (service and engineering) of the modified component;

h. Whether the original unmodified component was withdrawn from production and/or sale, and if so, when;

i. When the modified component was made available as a service component; and

j. Whether the modified component can be interchanged with earlier production components.

24. Separately, for the subject vehicle population and the subset of the subject vehicle population recalled in recall 20V-575, provide all certification data or other test data that evaluated the subject vehicles' compliance with S6.2.

25. To the extent not already provided in the responses to the preceding questions separately, for the subject vehicle population and the subset of the subject vehicle population recalled in recall 20V-575, provide any and all Weibull analyses or studies employing similar predictive methodologies relating to the alleged noncompliance or failure of the rearview cameras to display an image of the area behind in the subject vehicles.

Dated: August 6, 2021

[redacted]

Ann Carlson
Chief Counsel