

## FORD MOTOR COMPANY (FORD) RESPONSE TO RQ21-001

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 February 22, 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 "[a]ll MY 2017-2021 Super Duty (F-250, F-350, F-450) vehicles equipped with the subject component and remedied under recall 19V-864 manufactured by Ford for sale or lease in the United States, including, but not limited to, the District of Columbia, and current U.S. territories and possessions." Ford notes that recall 19V-864 (19S48) pertained to 2017-2019 model year vehicles produced through 11/3/2019. The 2020 and 2021 model year Ford Super Duty (F-250, F-350, F-450) vehicles equipped with remote tailgate release were originally produced with the production remedy parts included in recall 19V-864; accordingly those vehicles were not included in the 19V-864 field action. Based on discussions with the agency, Ford understands the agency's request to also pertain to 2020-2021 model year vehicles even though they were not subject to 19V-864 as described above, and is providing information pertaining to those vehicles as requested.

Request 1

State, by model and model year, the number of subject vehicles Ford has remedied under recall 19V-864 in the United States. Separately, for each subject vehicle remedied to date by Ford, state the following:

- a. Vehicle identification number (VIN);
- b. Make;
- c. Model;
- d. Model Year;
- e. Tailgate part number and design version installed as original equipment;
- f. Date of manufacture
- g. Date warranty coverage commenced;
- h. Date remedy for 19V-864 was installed;
- i. Tailgate part number and remedy parts design version installed by recall 19V-864; and
- j. 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

Ford records indicate that the approximate total number of 2017 through 2019 model year Ford Super Duty (F-250, F-350, F-450) vehicles remedied under recall 19V-864 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) is 161,983.

The approximate total number of 2020 and 2021 model year Ford Super Duty (F-250, F-350, F-450) vehicles equipped with remote tailgate release, 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) is 78,796.

The number of subject vehicles sold in the United States by model and model year is shown below:

| Model | 2017 MY | 2018 MY | 2019 MY | 2020 MY | 2021 MY |
|-------|---------|---------|---------|---------|---------|
| F-250 | 35453   | 14458   | 39628   | 31008   | 11477   |
| F-350 | 25278   | 11034   | 28916   | 22443   | 8112    |
| F-450 | 2141    | 1187    | 3888    | 3881    | 1875    |

The requested data is provided in Appendix A and includes the recall completion or refund dates for 2017 through 2019 model year Ford Super Duty (F-250, F-350, F-450) vehicles remedied under recall 19V-864. Ford notes that request 1e; Tailgate part number is for sheet metal only and has not been included with this information as the tailgate sheet metal was not part of the recall repair. For request 1i, the wiring harness assembly and tailgate handle release switch part numbers and changes can be found in Appendix H.

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 remedied by recall 19V-864 and Customer Satisfaction Program (20N03) to date:

- a. Consumer complaints, including those from fleet operators;
- b. Field reports, including dealer field reports;
- c. Reports involving a crash, injury or fatality;
- d. Property damage claims; and
- e. Third-party arbitration proceedings where Ford is or was a party to the arbitration; and
- f. Lawsuits, both pending and closed, in which Ford is or was a defendant or codefendant.

For subparts "a" through "f, / 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 "f, / 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                                                                     |
|----------|--------------------------------------------------------------------------------|
| A        | Allegation of unintended tailgate opening - while in motion                    |
| B        | Allegation of unintended tailgate opening - uncertain if vehicle was in motion |
| S        | Allegation of unintended tailgate opening - while stationary                   |

We are providing electronic copies of reports categorized as "B," where it is uncertain if the vehicle was in motion, and "S," while the vehicle was stationary, for your review because of the broad scope of the request.

Per discussion on February 24, 2021, the agency confirmed they are not requesting Ford provide information on peer vehicles under Customer Satisfaction Program 20N03. Therefore, this information is not included in the response.

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 other 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 that allege unintended tailgate opening while driving 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.

When we were able to identify that responsive duplicate field reports for an alleged incident were received, each of these duplicate reports was marked accordingly, and the group counted as one report. In other 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. In addition, field reports that are duplicative of owner reports are provided in Appendix C but are not included in the field report count.

VOQ Data: Of the twelve VOQs provided by the agency, eleven were provided with the opening resume and one provided after the opening resume. Two of the subject vehicle records did not have a VIN reported so Ford is unable to search its databases for corresponding reports. For one of these two reports, VOQ 11205304, the noted failure date is prior to the date Ford approved recall 19V-864 and therefore is not within the scope of this recall query.

For the remaining, Ford made inquiries of its GCCT database for customer contacts, its CQIS database for field reports, and its Global System for Analytics and Research (GSAR) database for warranty repairs regarding the vehicles identified on the VOQs with full VINs. Reports where identified are provided in the database contained in Appendix C.

For VOQs 11330252, 11345594, 11348759, 11338360, and 11397490, we were able to find the vehicles in our systems, but found no records indicating a visit to the dealership for this issue after having the recall repair completed.

Crash/Injury/Fatality Incident Claims: There were no reports of accident allegations in the VOQs provided by the agency. Ford identified no reports of accident, physical injury or fatality 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 and ambiguous lawsuits and claims in our Log of Lawsuits and Claims, provided in Appendix D. The number of relevant lawsuits and claims identified is also provided in this log. 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.

### 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. 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;
- l. Number of alleged fatalities, if any;
- m. Date remedy for 19V-864 was installed; and
- n. Tailgate part number and remedy parts design version installed by recall 19V-864.

Provide the table in Microsoft Access 2010, or a compatible format, entitled "COMPLAINT DATA." A pre-formatted data collection file, which provides further details regarding this submission, will be provided to you.

### 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. For request 3m, the remedy date for 19V-864 can be found in Appendix A. For request 3n, the wiring harness assembly and tailgate handle release switch remedy part numbers and changes can be found in Appendix H.

Request 4

Produce copies of all documents related to each item within the scope of Request No. 3. 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. 3.

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 4 is available for lawsuits and claims, it is provided in Appendix D. For request 3m, the remedy date for 19V-864 can be found in Appendix A. For request 3n, the wiring harness assembly and tailgate handle release switch remedy part numbers and changes can be found in Appendix H.

Detailed descriptions of the search methods and criteria, including all pertinent parameters, used to identify the items provided in response to Request 3 are described in Appendix B.

Request 5

State, by model and model year, a total count for all of the following categories of claims, collectively, that have been paid by Ford to date that relate to, or may relate to, the alleged defect in the subject vehicles: 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.

Separately, for each such claim, state 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. VIN;
- d. Repair date;
- e. Vehicle mileage at time of repair;
- f. Repairing dealer's or facility's name, telephone number, city and state or ZIP code;
- g. Labor operation number(s);
- h. Problem code(s);
- i. Diagnostic trouble code(s);
- j. Replacement part number(s) and description(s);
- k. Concern stated by customer;
- l. Cause as stated on the repair order;
- m. Correction as stated on the repair order; and
- n. Additional comments, if any, by dealer/technician relating to claim and/or repair.

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

Answer

Records identified in a search of the GSAR and Concern Driven Reporting (CDR) databases, as described in Appendix B, were reviewed for relevance and sorted in accordance with the categories described in the response to Request 2. The number and copies of relevant warranty claims identified in this search that may relate to the alleged defect in a subject vehicle are provided in the GSAR portion of the database contained in Appendix C. The categorization of each report is identified in the "Category" field.

When Ford was able to identify that duplicate claims for an alleged incident were received, each of these duplicate claims was marked accordingly and the group counted as one report. In other cases, certain vehicles may have experienced more than one incident and have more than one claim associated with their VINs. These claims have been counted separately. Warranty claims that are duplicative of owner and field reports are provided in Appendix C but are not included in the warranty report count.

Requests for "goodwill, field, or zone adjustments" received by Ford to date that relate to the alleged defect that were not honored, if any, would be included in the GCCT reports identified above in response to Request 2. Such claims that were honored are included in the warranty data provided. Ford assumes that providing the warranty claims in the electronic database format meets the requirements of this request as the agency can review or order the claims as desired.

Request 6

Describe in detail the search methods and search criteria used by Ford to identify the claims in response to Request No. 5, including the labor operations, problem codes, diagnostic trouble codes, part numbers and any other pertinent parameters used.

Answer

A detailed description of the search criteria, including all pertinent parameters, used to identify the claims provided in response to Request 5 are described in Appendix B.

Request 7

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 defect 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.

Answer

Information applicable to specific claims as requested above can be found in Appendix C. Diagnostic trouble codes are manually entered into the warranty database by the claim administrator.

Request 8

State, the terms of the warranty coverage offered by Ford on the remedy installed on the subject vehicles under recall 19V-864 (i.e., the number of months and mileage for which coverage is provided and the vehicle systems that are covered). Describe any extended warranty coverage option(s) that Ford offered for the subject vehicles and state by option, model, and model year, the number of vehicles that are covered under each such extended warranty.

Answer

For 2017-2021 model year Ford Super Duty vehicles, the New Vehicle Limited Warranty, Bumper-to-Bumper Coverage begins at the warranty start date and lasts for three years or 36,000 miles, whichever occurs first.

Optional Extended Service Plans (ESPs) are available to cover various vehicle systems, time in service, and mileage increments. As of the date of the information request, 179,061 new and used vehicle ESP policies had been purchased for 2017 through 2021 model year Ford Super Duty vehicles that could potentially cover the alleged defect in the subject vehicles. Ford is unable to determine how many of the ESP policies are applicable to the subject vehicles. The details of the various plans are provided in Appendix I.

For vehicles outside of the New Vehicle Limited Warranty period or ESPs, the 19V-864 recall remedy repair is covered for up to 12 months or 12,000 miles, whichever comes first.

Request 9

Produce copies of all service, warranty, and other documents that relate to, or may relate to, the alleged defect 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.

Answer

For purposes of identifying communications to dealers, zone offices, or field offices pertaining, at least in part, to the alleged defect, Ford has reviewed the following FCSD databases and files: The On-Line Automotive Service Information System (OASIS) containing Technical Service Bulletins (TSBs), Special Service Messages (SSMs) and Internal Service Messages (ISMs); ISMs contained in CQIS; and Field Review Committee (FRC) files. We assume this request does not seek information related to electronic communications between Ford and its dealers regarding the order, delivery, or payment for replacement parts, so we have not included these kinds of information in our answer.

A description of Ford's OASIS messages, ISMs, and the Field Review Committee files and the search criteria used are provided in Appendix B. Ford is not providing documents that were provided in PE18-011.

OASIS Messages: Ford identified one SSM, SSM #48360, issued November 27, 2019 for 2020 model year Super Duty vehicles equipped with remote tailgate release to aid technicians

in evaluating the Check Tailgate Ajar message in the Instrument Panel Cluster message center under specified conditions.

Internal Service Messages: Ford identified two ISMs that may relate to the agency's request. ISM #19-05-014 was issued May 21, 2019 for 2017 through 2019 model year Super Duty vehicles equipped with remote tailgate release. ISM #12102007 was issued February 12, 2021 for 2017 through 2021 model year Super Duty vehicles equipped with remote tailgate release.

Field Review Committee: Ford has not identified any field service action communications that may relate to the agency's request.

Ford currently has no plans to issue communications related to the alleged defect that is the subject of NHTSA's investigation. Copies of Ford's SSM and ISMs described above are provided in Appendix E.

#### Request 10

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. 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 K.

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. We believe our response meets this goal. If the agency would like additional materials, please advise.

#### Request 11

Provide the name, contact information, and part numbers for all suppliers Ford has purchased the recall remedy components from.

#### Answer

The supplier for the wiring harness assembly and the tailgate handle release switch can be found in Appendix J.

#### Request 12

Describe all modifications or changes made by, or on behalf of, Ford in the design, material composition, manufacture, quality control, supply, or installation of the recall 19V-864 remedy components, from the start of remedy installation to date, which relate to, or may relate to, the alleged defect in the subject vehicles. For each such modification or change, provide the following information:

- a. The date or approximate date on which the modification or change was incorporated into vehicle production;
- b. A detailed description of the modification or change;
- c. The reason(s) for the modification or change;
- d. The part number(s) (service and engineering) of the original component;
- e. The part number(s) (service and engineering) of the modified component;
- f. Whether the original unmodified component was withdrawn from production and/or sale, and if so, when;
- g. When the modified component was made available as a service component; and
- h. Whether the modified component can be interchanged with earlier production components.

Also, provide the above information for any modification or change that Ford is aware of which may be incorporated into vehicle production within the next 120 days.

Answer

Ford understands this request to relate to the "recall 19V-864 remedy components," which consist of the recall wiring harness service and production parts and tailgate handle release switch. This information can be found in Appendix H.

Request 13

State the number of each of the following that Ford has sold that may be used in the subject vehicles by component name, part number (both service and engineering/production), model and model year of the vehicle in which it is used and month/year of sale (including the cut-off date for sales, if applicable):

- a. Subject component; and
- b. Any kits that have been released, or developed, by Ford for use in service repairs to the subject component/assembly.

For each component part number, provide the supplier's name, address, and appropriate point of contact (name, title, and telephone number). Also, identify by make, model and model year, any other vehicles of which Ford is aware that contain the identical component, whether installed in production or in service, and state the applicable dates of production or service usage.

Answer

As the agency is aware, Ford service parts are sold in the U.S. to authorized Ford and Lincoln dealers. Ford has no means to determine how many of the parts were actually installed on vehicles, the vehicle model or model year on which a particular part was installed, the reason for any given installation, or the purchaser's intended use of the components sold.

Ford is providing the total number of Ford service replacement tailgate handle release switches and electrical connector assemblies by part number (both service and engineering), year of sale, where available, and supplier point of contact information in Appendix J.

Ford notes that the same tailgate handle release switch is used on other Ford vehicle lines and applications.

Request 14

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

- a. The causal or contributory factor(s);
- b. The failure mechanism(s);
- c. The failure mode(s);
- d. The risk to motor vehicle safety that it poses; and
- 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; and
- f. The reports included with this inquiry.

Answer

As the agency is aware, in 2019 Ford investigated reports of unintended tailgate opening on certain Super Duty vehicles equipped with an electronic tailgate latch release. This was also the subject of NHTSA investigation PE18-011. Ford's investigation found a number of potential causes for customer reports, as indicated in Ford's response to the agency's PE18-011 information request. A significant percentage of reports related to water in the release switch or an in-line connector in the tailgate harness, resulting in a short circuit that could potentially release the tailgate latch. Other reports appeared to result from other unidentified causes. Some reports resulted from aftermarket modifications. Moreover, other reports could be attributed to customers inadvertently opening the tailgate with the key fob, B-pillar key pad, or dash switch, and the driver being unaware that they have commanded the opening of the tailgate latches. However, based on that investigation and ongoing discussion with the agency, Ford initiated recall 19V-864 (19S48) which specifically addressed water in the release switch or the tailgate harness by adding jumper pigtails to isolate the tailgate release control wiring circuit and also install a redesigned tailgate release handle switch.

In addition, several actions were undertaken in production on 2020-2021 Super Duty vehicles, including:

- Incorporation of the improved tailgate release switch
- Implementation of instrument cluster messaging (see below) based on inferred diagnostics should a command be given to open the tailgate when the vehicle is not in Park



"Check Tailgate Ajar" MGG 7 when

- vehicle in gear
- < 4 Kph
- Once per ignition cycle



"Tailgate Fault Service Now" MSG 5 when

- vehicle in gear
- Once per ignition cycle
- Driving above 4 Kph

Ford also continued to monitor field performance for all vehicles with a power tailgate latch release system, including 2017-2019 Super Duty vehicles after completion of 19V-864, as well as on 2020-2021 Super Duty units that had the same improvements installed in production. Importantly, our investigation of complaints following completion of 19V-864 found that the recall service procedure was being administered properly by dealer technicians.

Consistent with our prior analyses and communications with the agency, not all reports of unintended opening appear to relate to water in the release switch or in the tailgate release control wiring circuit. Due to the intermittency of the concern, many dealer technicians are unable to replicate the concern and/or identify the cause to repair the vehicle.

In an effort to understand other potential causes, Ford has conducted extensive customer interviews and vehicle inspections. Customer interviews have found that reports occur under a variety of conditions, including temperature variations, towing vs. not towing, wet conditions vs. dry, etc. Ford's Field Service Engineers have conducted multiple detailed vehicle inspections and have been unable to replicate the concern on any unit to date, even on vehicles where customers indicate the condition is repeatable. Ford also continues to obtain and analyze field return parts, but to this point has been unable to replicate the concern on these return parts.

In an attempt to replicate the concern via more extensive vehicle testing, Ford has obtained complaint vehicles which were stated to have exhibited repeated unintended openings. Multiple analyses have been conducted to-date, including extensive drive evaluations, environmental testing, vehicle testing simulating varying road surfaces, etc. Thus far we have not been able to replicate the concern, although these efforts continue.

As described in our response to PE18-011, there are a number of ways for a driver to command the tailgate to open, including a key fob button, a release switch on the instrument panel, and the B-pillar key pad. In fact, through customer interviews and review of customer comments, Ford has found instances where drivers acknowledge inadvertently commanding the tailgate latch to open via one of these methods.

Ford continues to investigate whether reports of unintended tailgate opening occur while driving, or while the vehicle is static but is undetected until the vehicle is moving. Ford is also investigating whether reports of tailgate opening are a result of the tailgate not being fully latched prior to driving the vehicle as opposed to an uncommanded opening of a properly latched tailgate.

Although Ford continues to receive reports of tailgate opening, the overall rate remains very low. Ford has received no reports of accident or physical injury associated with this condition. The field data includes some customer complaints alleging damage to either their tailgate and/or a towed trailer should the tailgate open unexpectedly.

While the intermittency of this concern and inability to replicate the concern on complaint vehicles continue to present a challenge, our extensive investigation efforts will continue, and we would be happy to review the progress of our investigation with the agency at any time.