

FORD MOTOR COMPANY (FORD) RESPONSE TO PE23-001

Ford's response to this **Preliminary Evaluation** 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 **Preliminary Evaluation**.

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.

On February 22, 2023, Ford requested a two and a half-week extension to produce responsive documents related to this inquiry. On February 24, 2023 the Agency granted Ford an extension and recognized the new due date as April 17th, 2023.

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 documents dated up to and including **February 15, 2023**, the date of your inquiry. Ford has searched within the following offices for responsive documents: Environment, Safety Engineering, and Compliance, Ford Customer Service Division, Global Core Engineering, Office of the General Counsel, and North American Product Development.

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 (17-character VIN);

- b. Make;
- c. Model;
- d. Model Year;
- e. Subject component part number and design version installed as original equipment.
- f. Date of manufacture (MM/DD/YYYY);
- f. Date warranty coverage commenced.; (MM/DD/YYYY); and
- g. The State in the United States where the vehicle was originally sold or leased or delivered for sale or lease (postal abbreviation).

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

Answer

Ford records indicate that the approximate total number of **2011-2019 Ford Explorer 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) is **1,858,944**

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

Model	MY	Units Produced	Units Sold
	2011	82,493	82,481
	2012	86,502	86,490
	2013	238,741	238,713
	2014	208,446	208,405
Explorer	2015	223,793	223,739
	2016	278,710	278,454
	2017	356,911	356,767
	2018	254,226	254,132
	2019	<u>129,796</u>	<u>129,763</u>
Total		1,859,618	1,858,944

The requested data for each subject vehicle 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; and

- f. Third-party arbitration proceedings, both pending and closed, 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 "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	Allegation
A1	Allegation of windshield trim panel detaching from the vehicle while the vehicle was in motion.
A2	Allegation of windshield trim panel missing from the vehicle, no allegation of vehicle in motion when panel went missing.
B1	Allegation of windshield trim panel being loose or causing wind noise or a rattle noise, but not detaching.
B2	Allegation of windshield trim panel showing a crack or some sort of breaking defect, but not detaching.

We are providing electronic copies of reports categorized as "B1" or "B2" as "non-specific allegations" for your review because of the broad scope of the request. Based on our engineering judgment, the information in these reports is insufficient to support a determination that they pertain to the alleged defect.

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 that allege a windshield trim detachment while the vehicle was in motion in a subject vehicle are provided in the GCCT portion of the database contained in **Appendix C**. The categorization of each report is identified in the "Category" field.

Legal Contacts: Ford is providing, in **Appendix B**, a description of Legal Contacts and the activity that is responsible for this information. To the extent that responsive (i.e., not ambiguous) owner reports indicate that they are Legal Contacts, Ford has gathered the related files from the Office of General Counsel (OGC). Non-privileged documents for files that were located that are related to the responsive owner reports are provided in **Appendix D**.

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 a windshield trim detachment while vehicle was in motion 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: This information request had an attachment that included **177** Vehicle Owner Questionnaires (VOQs), **20** of which were duplicative. Ford made inquiries of its GCCT database for customer contacts, and 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. Reports where identified are provided in the database contained in **Appendix C**.

Crash/Injury Incident Claims: For purposes of identifying allegations of accidents or injuries that may have resulted from the alleged defect, Ford has reviewed responsive owner and field reports, and lawsuits and claims. A chart identifying potentially relevant allegations is being provided in **Appendix C**. Copies of reports corresponding to these alleged incidents are provided in the FMC360, CQIS, and Analytical Warranty System (AWS) portions of the database provided in **Appendix C** and are identified under A0 classification.

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 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 sorted in accordance with the categories described above.

Ford has also located other lawsuits, claims, or consumer breach of warranty lawsuits, each of which is ambiguous as to whether it meets the alleged defect criteria. We have included these lawsuits and claims as "non-specific allegations" for your review because of the broad scope of the request. Based on our engineering judgment, the information in these lawsuits and claims is insufficient to support a determination that they pertain to the alleged defect.

We are providing the requested detailed information, where available, on the responsive and ambiguous lawsuits and claims in our Log of Lawsuits and Claims, as **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 FMC360 reports relating to matters shown on the log are provided in **Appendix D**. Documents that are protected by attorney-client privilege and that are not being provided with this response are listed in the privilege log provided in **Appendix D1**. With regard to these lawsuits and claims, Ford has not undertaken to contact outside law firms to obtain additional documentation.

Reports are summarized in Figure 1 in **Appendix C**. Categories A1 and A2 are included in the "Relate To" sections of Figure 1 for subject vehicles as they indicate a detachment while the vehicle was in motion, which is what Ford understands as the focus of the Agency's request. Reports for Categories B1, and B2 are summarized in the "May Relate To" sections for subject vehicles.

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), 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; and
- l. Number of alleged fatalities, if any.

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

Answer

Ford is providing copies of owner and field reports referenced 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 as **Appendix D**.

Request 4

Produce electronic copies of all documents related to each item within the scope of Request No. 2. 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 Request No. 2.

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**. 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) email address and telephone number; (please use distinct fields for each data type);
- c. Vehicle owner or fleet street address, city, state (postal abbreviation), and ZIP code (please use distinct fields for each data type);
- d. 17-character VIN;
- e. Repair date (MM/DD/YYYY);
- f. Vehicle mileage at time of repair;
- g. Repairing dealer's or facility's name, telephone number, city and state or ZIP code; (please use distinct fields for each data type);
- h. Labor operation number (s);
- i. Problem code (s);
- j. Replacement part number(s) and description(s);
- k. Concern stated by customer; and
- l. Cause as stated on the repair order;
- m. Correction as stated on the repair order; and
- l. Additional comments, if any, by dealer/technician relating to claim and/or repair.

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

Answer

Records identified in a search of the AWS database, 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 allege a windshield trim molding detachment while driving in a subject vehicle are

provided in the AWS portion of the database contained in **Appendix C**. The categorization of each report is identified in the "Category" field.

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 FMC360 reports identified above in response to **Request 2**. Such claims that were honored are included in the warranty data provided.

Reports are summarized in Figure 1 in **Appendix C**. Categories A1 and A2 are included in the "Relate To" sections of Figure 1 for subject vehicles as they indicate a detachment while the vehicle was in motion, which is what Ford understands as the focus of the Agency's request. Reports for Categories B1, and B2 are summarized in the "May Relate To" sections for subject vehicles.

Request 6

Describe in detail the search criteria used by Ford to identify the claims identified in response to Request 5, including the labor operations, problem codes, part numbers and any other pertinent parameters used.

Answer

Detailed descriptions 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**. Labor operation codes are manually entered into the warranty database by the claim administrator. Diagnostic trouble codes are not available for this issue.

Request 8

State, by make 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). 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 2011-2019 model year Ford Explorer 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 not available to cover for Exterior Ornamentation Trim.

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 types 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**.

OASIS Messages: Ford has identified (3) TSB or SSM communications that may relate to the Agency's request.

Internal Service Messages: Ford has identified (1) ISM communications that may relate to the Agency's request.

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.

Ford is providing a copy of the identified TSB, SSM, and ISM communications in **Appendix K**.

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. 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 E**.

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 F** 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 E1** 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

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 subject component, from the start of production to date, which relate to, or may relate to, the alleged defect in the subject vehicles and the model year 2020 Ford Explorer . 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 numbers (service and engineering) of the original component;
- e. The part number (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

A table of the requested changes is provided in **Appendix H**.

Ford currently has no plans for modifications related to the subject components in the subject vehicles. Starting at model year 2020, Ford created a new vehicle, which modified the design of the windshield trim panel.

Request 12

State the number of subject components 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 the 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

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 service parts sold were 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 **windshield trim panel moldings** by part number (both service and engineering) and year of sale, where available, in **Appendix I**.

Request 13

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;
- 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 report included with this inquiry.

In addition, please explain any differences in the severity of the alleged defect in the subject vehicles versus the defect in the MY 2016-2019 Explorers identified in the recall of roof trim cover detachment (NHTSA Recall No. 21V-316 and Ford Recall No. 21S22).

Answer

The A-pillar applique molding looseness on the subject vehicles is a consequence of several contributory factors at the time of installation. The a-pillar applique is installed above other components, such as the windshield, the roof ditch tape, and the a-pillar molding bracket. Ford is providing a diagram of this assembly in **Appendix F-1**.

During assembly, of a vehicle, the roof ditch tape is installed first, followed by the windshield glass. The A-pillar bracket is installed next utilizing 6 bolts to secure it to the body.

The A-pillar molding is located on the bracket using a 4-way locator to both the bracket and the body side and fastened to the bracket using molded plastic fasteners. Once the 4-way locator is in the designed position on the top corner of the applique, it needs to be properly inserted to avoid high insertion efforts. The 4-way locator begins the process of aligning the attachment clips with the mating holes in the molding.

The molded plastic fasteners may not provide the intended level of attachment if the stack-up of the individual components is higher than intended. The A-pillar Molding will become loose if the 4-way locator/attachment separates itself from the body sheet metal during or shortly after the installation. This permits the air to flow through the molding causing wind noise, appearance concerns or detachment from the vehicle.

Looseness of the A-pillar molding can also occur during a windshield replacement because the A-pillar moldings must be removed to replace the windshield glass. A misalignment of the

windshield can cause a stack-up condition which can prevent the A-pillar moldings from being reinstalled properly. Additionally, any damaged or missing clips can result in an A-pillar molding that is not installed as designed and intended. As the majority of windshield replacements are performed outside of warranty, Ford does not have the ability to quantify this information.

Ford has taken several actions to try to address the issue on the subject vehicles, including the addition of operators to the line, the addition of epoxy and a patch of butyl tape to adhere the parts to the vehicle, the modification of the clips, several bracket materials changes, tactile inspections, retooling of the bracket and clips, and gaging checks. Significant declines in claims occurred after the implementation of the butyl tape strip in December 2011, as well as the modification of its tolerance and placement made in 2012 and afterwards in 2013. In 2015 a modification to the A-pillar molding design was also implemented to prevent wind noise. For a graphic detail on the design changes and its impact to claims, see **Appendix F**.

As of January 27, 2023, Ford is not aware of any crashes, injuries or fatalities caused by the detachment of the windshield trim panel. Ford's analysis of 177 VOQs claiming a potential road hazard was inconclusive in identifying any actual instances of crashes, injuries, or fatalities as a result of this concern. Ford has identified 1 VOQ with an allegation of a detached windshield trim panel contacting a motorcycle while driving, with no injuries resulting from the incident.

Ford's review of the claims relating to this issue confirms that symptoms which could indicate a looseness of the A-pillar molding are highly detectable and appear prior to a complete detachment of the molding. Over 70% of the customers in these claims stated that that the A-pillar molding was emitting noises, such as rattles or increasing wind noise, and, in some cases, visual cues were also present, such as a visible gap or a tactile feeling of looseness.

Ford's investigation identified no warranty claims, field reports, or legal claims alleging a crash, injury or fatality pertaining to the alleged defect in the subject vehicles, on a population of over 1.8 million vehicles that are up to twelve years old. While it is possible for the molding to detach from the vehicle, the likelihood of this happening, based on the claims reviewed, is relatively low (0.007R/1000 for MY2011-2019). Given the field performance, the low likelihood, and the low severity of the failure, Ford has concluded that this issue does not present an unreasonable risk to motor vehicle safety in these vehicles.

Concerning the MY 2016-2019 Explorer roof trim cover detachment recall, Ford initially reviewed this concern and determined it did not present an unreasonable risk to safety due to the low mass of the roof rail cover, low projected probability of detachment, and high detectability of a loose roof rail cover through visual and audible means. Ford shared its analysis of this concern with the Agency on September 16, 2020. In the interest of customer satisfaction, Ford's Field Review Committee (FRC) approved an extended coverage program (20N11) for North American vehicles on November 20, 2020, to provide customers who experience the concern with a one-time repair for a period of 10 years/150,000 miles. Ford believed that the extended coverage program in combination with the high detectability of this concern would result in the proactive repair of vehicles prior to progression of the issue to a potential detachment.

On April 1, 2021, Ford met with the Agency to review the updated data. The Agency requested that Ford conduct a safety recall for this concern. After an updated review of the warranty data, Ford's Field Review Committee approved safety action 21S22 for vehicles with painted roof rail covers on April 30, 2021.

The windshield trim panel moldings at issue in this PE are smaller and lighter (measuring 895mm approximately and having a 0.370 kg weight), than the roof rail covers that were included in

21S22. Nonetheless, as indicated in the 21S22 Part 573, Ford is aware of no accidents or injuries resulting from the detachment of the larger and heavier roof rail cover.

Ford believes that a detached windshield trim panel at issue in this PE does not present an unreasonable risk to motor vehicle safety due to the detectability of a damaged panel, the size and shape of the component, and the data that indicates there are no accidents or injuries as a result of this issue.