

FORD MOTOR COMPANY (FORD) RESPONSE TO PE23-015 Request 2Request 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 and peer 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) Reports involving a loss of motive power
- f) Property damage claims
- g) Third-party arbitration proceedings, both pending and closed, where Ford is or was a party to the arbitration; and
- h) Lawsuits, both pending and closed, in which Ford is or was a defendant or codefendant.

For subparts “a” through “h” 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 “h” 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 “g” and “h,” identify the parties to the action, as well as the caption, court, docket number, and date on which the complaint or other document initiating the action was filed.

Answer

The requested numbers of items identified in searches for the alleged defect are provided in “PE23-015 Request 2 – Figure 1.pdf. The categorization of these items is identified in the “Category” field, using the following categories:

Category	Allegation
A1	Oil Pump Failure w/ Loss of Motive Power and No Mention of “Progression” Symptoms (NVH, Check Engine Light, Oil Pressure Light, Reduced Power/Limp Mode)
A2	Oil Pump Failure w/ Loss of Motive Power and Mention of “Progression” Symptoms (NVH, Check Engine Light, Oil Pressure Light, Reduced Power/Limp Mode)
B1	Oil Pump Failure w/ Reduced Power/Limp Mode

B2	Oil Pump Failure w/ Mention of "Progression" Symptoms (NVH, Check Engine Light, Oil Pressure Light) and No Mention of Reduced Power/Limp Mode
C	Oil Pump Failure w/ Ambiguous Customer Symptoms

Twelve (12) reports of melting of components internal to the engine have been received by Ford, as well as one (1) report of smoke being observed.

Ford identified one VIN with underhood fire allegations (there are three reports associated with this occurrence). The customer's insurer alleged the fire was caused by an oil pump failure. Ford inspected this vehicle and found a slight crack in the engine block, but no evidence of a fire. Two of the three reports related to this occurrence contained property damage allegations, but no allegations of personal injury. Ford has received no other property damage allegations.

Ford identified 1 lawsuit with allegations of physical injury potentially related to the alleged defect. Ford has not confirmed the root cause of the occurrence and the plaintiff did not allege an oil pump defect, but in the spirit of transparency, Ford is providing this information. The complaint alleges the vehicle lost motive power due to low oil resulting in 2 customers that were alleged to be injured in this occurrence. This lawsuit also includes an allegation of an accident, the only such allegation Ford has identified.

Ford identified no reports of fatalities pertaining to the alleged defect in subject vehicles.

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