

FORD MOTOR COMPANY (FORD) RESPONSE TO PE23-015 REQUEST 4Request 4

Produce 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 response to Request No. 2.

Answer

To the extent information sought in Request 4 is available, it is provided in the folder Request 4 (Non-Confidential).

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 the document "PE23-015 Request 4 – Search Criteria.pdf".

Owner Reports: Records identified in a search of the Global Contact Center Technology (GCCT) database, as described in the document "PE23-015 Request 4 – Search Criteria.pdf", were reviewed for relevance.

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. In other cases, certain vehicles may have experienced more than one incident and have more than one report associated with their VINs.

Field Reports: Records identified in a search of the Global Common Quality Indicator System (GCQIS) database, as described in the document "PE23-015 Request 4 – Search Criteria.pdf", were reviewed for.

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. In other cases, certain vehicles may have experienced more than one incident and have more than one report associated with their VINs.

Legal Contacts: Ford provides, in the document "PE23-015 Request 4 – Search Criteria.pdf", 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).

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. With regard to these lawsuits and claims, Ford has not undertaken to contact outside law firms to obtain additional documentation.

Lawsuits and claims gathered in this manner were reviewed for relevance.

Detailed descriptions of the search methods and criteria, including all pertinent parameters, used to identify the items provided in the document "PE23-015 Request 4 – Search Criteria.pdf".

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