

FORD MOTOR COMPANY (FORD) RESPONSE TO PE23-015 REQUEST 10Request 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 and peer 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;
- g) Prediction modeling on the component's life/wear expectancy; and
- h) The tests performed that led to the initial hypothesis that incorrectly aligned caulking (staking) of the oil pump drive tensioner arm to the tensioner rear plate can be a contributing factor to insufficient retention of tensioner arm, resulting in the alleged defect.

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 Ford documentation in the Non-Confidential Documents folder contained in the Request 10 (Non-Confidential) folder.

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 the Confidential Documents folder contained in the Request 10 (Confidential) folder with a request for confidentiality under separate cover 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 the Non-Confidential Documents folder contained in the Request 10 (Non-Confidential) folder and are labeled "Public".

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 "PE23-015 Privilege Log.pdf" contained in the Request 10 (Non-Confidential) folder.

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.

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.

In response to Request 10, subpart "g," Ford is providing the document "PE23-015 Request 10 – Conf Bus Info - Failure Rate Projections.pdf in the Request 10 (Confidential) folder.

In response to Request 10, subpart "h," the hypothesis that incorrectly aligned caulking of the oil pump driver tensioner was not derived from testing. Ford observed incorrectly aligned caulking when reviewing engines returned in warranty in late 2018 and early 2019. Ford noted this qualitative observation to tensioner supplier, Dayco, who implemented position-monitoring as a result.

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