

Request 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 for customer complaints, it is provided in the files "PE23-021 Request 4 – Owner Report Files - Subject Vehicles" and "PE23-021 Request 4 - Owner Report Files - Peer Vehicles."

To the extent information sought in Request 4 is available for field reports, it is provided in the files "PE23-021 Request 4 - Field Report Files - Subject Vehicles" and "PE23-021 Request 4 - Field Report Files - Peer Vehicles."

To the extent information sought in Request 4 is available for lawsuits and claims, it is provided in the files "PE23-021 Request 4 - Lawsuits and Claims Files - Subject Vehicles" and "PE23-021 Request 4 - Lawsuits and Claims Files - Peer Vehicles."

Detailed descriptions of the search methods and criteria, including all pertinent parameters, used to identify the items provided in response to Request 2 are described in the file "PE23-021 Request 4 - Search Criteria."