

Request 13

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;
- f. A brief summary of the findings and/or conclusions resulting from the action; and
- g. Prediction modeling on the components life/wear expectancy.

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 certain 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 the folder titled "Non Confidential" within the "Request 13" folder.

Ford is submitting additional responsive documentation in the "Confidential" folder within the "Request 13" folder 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 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 titled "PE23-021 Request 13 – Privilege Log".

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 previously presented to NHTSA on some of its assessments on November 2, 2023. A copy of that presentation was submitted previously and is also provided in the "Confidential" folder 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.

In response to Request 13, subpart “g,” Ford is providing the document “PE23-021 Request 13 – Conf Bus Info - Failure Rate Projections” in the Request 13 (Confidential) folder. As described previously, Ford will also provide a redacted copy, labeled “Public.”

Additionally, prior to the submission of this response, Ford’s Field Review Committee reviewed the concern and approved a field action 24S06 (NHTSA Campaign Number 24V-099). Ford filed its Defect Information Report for this issue with NHTSA on February 9, 2024. That Defect Information Report contains a chronology of all principal events that were the basis for the determination that the defect related to motor vehicle safety, many of which are responsive to this question.

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.