

Request 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 vehicles. Please provide this information separated by model and model year.

- 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) Property damage claims;
- f) Third-party arbitration proceedings, both pending and closed, where Ford is or was a party to the arbitration; and
- g) Lawsuits, both pending and closed, in which Ford is or was a defendant or codefendant.

For subparts "a" through "g" 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 "g" 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 "f" and "g" 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 number of items identified in searches for the alleged defect are provided in file "EA23-002 Request 2 – Figure 1."

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 Ford's response to Request 4.

The following categorizations were used in the review of reports located in each of these searches:

<b>Category</b>	<b>Definition</b>
A	Allegation of loss of motive power (LOMP), which was caused by, or may have been caused by, any of the subject components; vehicle was in motion
B1	Valve issue (known or potential), no LOMP alleged while vehicle in motion; with indication (e.g., noise, cluster message, check engine light, etc.)

B2	Valve issue (known or potential) resulting in LOMP while vehicle not in motion (e.g., in a driveway or at a stop sign)
B3	Valve issue (known or potential), no start
C	Valve Issue (known or potential), ambiguous circumstances that result in catastrophic engine damage
D	The report is unrelated to the alleged defect

Owner Reports: Records identified in a search of the Global Contact Center Technology (GCCT) database, as described in Ford's response to Request 4, were reviewed for relevance and sorted in accordance with the categories described above. The copies of relevant owner reports identified in this search for the alleged defect are provided in the GCCT portion of the database contained in Ford's response to Request 3. The categorization of each report is identified in the "Category" field.

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, and the group counted as one report. In other cases, certain vehicles may have experienced more than one incident and have more than one report associated with their VINs. These reports have been counted separately.

Field Reports: Records identified in a search of the Common Quality Indicator System (CQIS) database, as described in Ford's response to Request 4, were reviewed for relevance and sorted in accordance with the categories described above. The number and copies of relevant field reports identified in this search for the alleged defect are provided in the CQIS portion of the database contained in Ford's response to Request 3. The categorization of each report is identified in the "Category" field.

When we were able to identify that responsive duplicate field reports for an alleged incident were received, each of these duplicate reports was marked accordingly, and the group counted as one report. In other cases, certain vehicles may have experienced more than one incident and have more than one report associated with their VINs. These reports have been counted separately.

VOQ Data: Of the fifty-two (52) VOQs provided by the agency in the Information Request, thirty-nine (39) have provided full 17-digit Vehicle Identification Numbers (VINs). Two of the thirty-nine (39) VINs have two associated VOQs per VIN. For the VOQs where the full VIN is not reported, Ford is unable to search its databases for corresponding reports.

Ford made inquiries of its GCCT database for customer contacts, its CQIS database for field reports, and its Global System for Analytics and Research (GSAR) database for warranty repairs for the thirty-nine (39) full VINs associated with the VOQs provided by the agency in the Information Request. Reports where identified are provided in the database contained in Appendix C. Ford has determined that six (6) of the thirty-nine (39) VOQs with full VINs provided by the agency in the Information Request are unrelated to the alleged defect of EA23-002 and have been marked accordingly as category D in Ford's response to Request 3.

Crash/Injury/Fatality Incident Claims: Ford identified two (2) reports of physical injury pertaining to the alleged defect in the subject vehicles.<sup>1</sup> Ford identified no reports of accident or fatality pertaining to the alleged defect in subject vehicles.

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 various legal matters, including product liability lawsuits, claims, and consumer breach of warranty lawsuits and arbitrations against the Company.

Lawsuits and claims gathered in this manner were reviewed for relevance and categorized in accordance with the categories described above.

We are providing the requested detailed information, where available, for the responsive and ambiguous lawsuits and claims in our Log of Lawsuits and Claims, provided in Ford's response to Request 3. The number of relevant lawsuits and claims identified is also provided in this log. To the extent available, copies of complaints or first notices relating to matters shown on the log are provided in Ford's response to Request 4. To the extent available, GCCT reports related to the matter on the log are provided in Ford's response to Request 3. With regard to these lawsuits and claims, Ford has not undertaken to contact outside law firms to obtain additional documentation.

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<sup>1</sup> These personal injury claims were reported in TREAD Quarter two (2) in year 2022, Quarter four (4) in year 2021, and Quarter one (1) in year 2022. After further review of these claims, Ford has determined these claims were incorrectly identified as personal injury claims.