

FORD MOTOR COMPANY (FORD) RESPONSE TO PE24-030 PART 1

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 and peer vehicles:

- a. Consumer complaints, including those from fleet operators.
- b. Field reports, including dealer field reports.
- c. Reports involving a crash, injury, or fatality.
- d. Property damage claims.
- e. Third-party arbitration proceedings, both pending and closed, where Ford is or was a party to the arbitration.
- f. Lawsuits, both pending and closed, in which Ford is or was a defendant or codefendant.

For subparts "a" through "f" 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 "f" 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 "e" and "f" 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

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).

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

Category	Definition
A1	Inverted image
A2	Loss of image, intermittent loss of image, and/or flickers
A3	Image is distorted, blurry, cloudy, and/or pixelated

Crash/Injury/Fatality/Fire/Property Damage Incident Claims: Ford has not identified any owner report or legal claims alleging injury or property damage related to the alleged defect to the subject or peer vehicles.

There were eight (8) total consumer legal claims with six (6) stating rear-view camera inoperable or malfunction and two (2) stating rear-view camera image distortion.

The requested number of items identified in searches for the alleged defect and additional information requested for items e and f are provided in the file "PE24-030 Part 1_Request2_Total Count of Responsive Claims_amendment.xlsx"