

FORD MOTOR COMPANY (FORD) RESPONSE TO PE24-030 Part 2

Request 2

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 summary of the findings and/or conclusions resulting from the action.

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 documentation in the folder titled "Non-Confidential" within the "Part 2 - Request 2" 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 a request for confidential treatment for files containing Confidential Business Information (CBI) to the Office of Defects Investigation (ODI) of NHTSA and the agency's Office of Chief Counsel pursuant to 49 CFR Part 512 Via the Safety Defect Investigations (SDI) Portal within the "Confidentiality Request" subfolder under "Cover Letters." For each file submitted through the SDI Portal where CBI is being requested, Ford is submitting a redacted version or matched pair of each file for which CBI is being requested. For each matched pair of documents, the file will be either named with "_Confidential" for CBI files or "_Public" for the redacted copies. 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 titled "PE24-030 Part 2 Request 2 – Privilege Log."

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.