

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:

- 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 "RQ24-002 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 and dispositioning of reports located in each of these searches:

Category	Definition
A1	Allegation of power steering pressure line disconnection resulting in a loss of power steering and power brake assist reported to have occurred 365 or more days after the 22V-089 inspection was performed.
A2	Allegation of power steering pressure line disconnection resulting in a loss of power steering or power brake assist reported to have occurred 365 or more days after the 22V-089 inspection was performed.
B	Allegation of power steering pressure line disconnection with ambiguous

	customer effect reported to have occurred 365 or more days after the 22V-089 inspection was performed. .
C	Allegation of power steering pressure line disconnection reported to have occurred less than 365 days after the 22V-089 inspection was performed. .
D1	Allegation of a power steering pressure line leak reported to have occurred 365 or more days after the 22V-089 inspection was performed.
D2	Allegation of a power steering pressure line leak reported to have occurred less than 365 days after the 22S08 inspection was performed.
E	Inspection for 22V-089
F	Allegation of a power steering pressure line leak or disconnection for a VIN that was closed to 22V-089 because the vehicle received the updated power steering pressure lines in a prior repair.

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 number and 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.

Where 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.

NHTSA Vehicle Owner Questionnaire (VOQ) Data:

Of the eleven (11) VOQs identified by the agency in the Information Request, five (5) provided full, valid 17-digit Vehicle Identification Numbers (VINs) and one (1) VOQ provided was submitted with an invalid VIN. For the VOQs where the full VIN is not reported or the VIN provided is invalid, Ford is unable to search its databases for corresponding reports. Note that one of the VOQs that provided a full and valid VIN, ODI# 11564944, does not meet the definition of a subject vehicle(s) for this Recall Query because the VIN submitted with this VOQ is included in recall 24V-097.

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 four (4) full VINs associated with the VOQs provided by the agency in the Information Request that meet the definition of a subject vehicle for this Recall Query. Reports identified are provided in the database contained in Ford's response to Request 3.

Crash/Injury/Fatality/Fire Incident Claims: Ford identified one (1) report alleging personal injury and property damage, and one (1) report of a crash pertaining to the alleged defect in the subject vehicles.

The report alleging personal injury and property damage that included customer verbatims that describe psychological injuries sustained by the customer, no physical injury description was provided. The customer alleges they lost power steering and power brake assist in their 2021 Ford E-450 due to an inadequate connection between the power steering pressure line and the brake Hydroboost unit. The customer also indicates they sought immediate repairs. Ford has not confirmed the root cause of the alleged personal injury or property damage.

Ford has not confirmed the root cause of the alleged crash. The customer alleges the incident was caused by a defect with the pressure line that connects to the brake master cylinder. Ford interprets this to refer to the high-pressure power steering line and/or jumper line that connects the power steering pump to the brake booster. The complaint alleges the defect resulted in the loss of power steering assist and power brake assist which caused an accident.

Ford identified no reports of fatality pertaining to the alleged defect in subject vehicles.

Disconnection of the power steering pressure line may result in smoke observable by the vehicle occupants. Although two (2) such reports are included in the "fire" incident category, Ford notes that there are no reports of visible flame. Additionally, one (1) claim included in the "fire" incident category includes technician comments which state that the power steering pump "burned up." There is no allegation of flame related to this report.

Claims, Lawsuits, and Arbitrations: For the 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.

One (1) such claim, Ford file number D214084, alleges a crash and is described earlier in this response.

Ford file number D214803 details a lawsuit in which the plaintiffs claim their vehicle experienced a simultaneous power brake and power steering failure in a manner consistent with that described in 22V-089. Ford has not confirmed the root cause of the occurrence.

Ford file number D221051 details a consumer claim in which the consumer claims their vehicle is defective and that their vehicle has undergone several repair attempts. Ford has not confirmed the root cause(s) associated with this claim and the plaintiff did not reference a power steering line disconnection, but in the spirit of transparency, Ford is providing this information.