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. Property damage claims;
e. Third-party arbitration proceedings, both pending and closed, where Ford is or was a party to the arbitration; and
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 requested number of items identified in searches for the alleged defect are provided in file “RQ24-005 Request 2 – Figure 1.”

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

Category	Definition
A1	Wheel Lock-Up due to Sudden (Unexpected) Downshift
A2	Sudden (Unexpected) Transmission Downshift
B1	Wheel Lock Up Unknown Cause
B2	Harsh Downshift and Other Downshifting Issues

Wheel lock up was interpreted to include vehicle and rear end lock up, as well as perceived “brake lock up” when the context suggested an unexpected transmission downshift while travelling at a speed that may have precipitated the event.

Category A1 includes reports of wheel lock-up due to sudden or unexpected downshifts and also includes reports of perceived wheel lock up that do not mention a downshift event, but may have been related based on the vehicle repairs performed.

Category A2 includes reports of unexpected downshifts as well as perceived “brakes grabbing" when the context suggested an unexpected transmission downshift.

Category B1 includes reports of perceived wheel lock up that do not mention a downshift event and may not be related based on the vehicle repairs performed.

Category B2 includes reports of harsh downshifts and instances in which the downshift was appropriate, but there was a concern with shift quality (delayed, harshness, flares, clunk, shudder, etc.).

Ford is providing electronic copies of the reports categorized as “B1” and “B2” as "non-specific allegations" for your review because of the broad scope of the request. However, based on Ford's engineering judgment, the information in these reports is insufficient to support a determination that they pertain to sudden or unexpected downshifting of the automatic transmission.

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 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 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 eighty-six (86) VOQs provided by the agency in the Information Request, sixty-nine (69) have provided full 17-digit Vehicle Identification Numbers (VINs). 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 sixty-nine (69) full VINs associated with the VOQs provided by the agency in the Information Request. Where identified, reports are provided in the database contained in Ford's response to Request 3. Ford determined that thirteen (13) of the eighty-six (86) VOQs provided by the agency in the Information Request are unrelated to the alleged defect of RQ24-005 and have been marked accordingly as category C in Ford's response to Request 3.

Crash/Injury/Fatality/Property Damage Incident Claims: Ford has not identified owner reports or legal claims alleging crash, personal injury or property damage pertaining to the alleged defect in the subject vehicle. Ford identified no reports of fatality pertaining to the alleged defect in the subject vehicle.

In the VOQs provided by the agency, there are two alleged injuries. In one of the VOQs the consumer indicates that his vehicle experienced an unexpected downshift causing his vehicle to crash into a concrete barrier and another vehicle, injuring himself and the driver of the other vehicle. The full VIN is not reported in this VOQ and Ford is unable to search its databases for corresponding reports. In the other VOQ the consumer indicates that their vehicle experienced an unexpected downshift, causing the front passenger to strike their head on the dashboard. Ford does not have associated records for the incident described in this VOQ.

Claims, Lawsuits, and Arbitrations: For purposes of identifying incidents that may relate to the alleged defect in the 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 responses to Requests 3 and 4. With regard to these lawsuits and claims, Ford has not undertaken to contact outside law firms to obtain additional documentation.