

FORD MOTOR COMPANY (FORD) RESPONSE TO RQ24-008 Request 2Request 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 numbers of items identified in searches for the alleged defect are provided in “RQ24-008 Request 2 – Figure 1.pdf. The categorization of these items is identified in the “Category” field, using the following categories:

Category	Description
A	Potential Cracked Injector
B	Field Service Action Remedy Applied (Powertrain Control Module Software Update, Drain Tube Installation)

Ford has identified 7 VINs among the subject vehicles that have allegedly experienced underhood fires. Between legal claims, consumer complaints, field reports, and warranty, Ford has identified 14 records containing fire allegations and 7 records containing property damage claims associated with these 7 VINs. To date, Ford has been able to repurchase and inspect 2 of these 7 VINs. Ford’s analysis indicates these 2 VINs each had a cracked fuel injector.

Ford identified no instances of injury or fatality pertaining to the alleged defect in subject vehicles.

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