

FORD MOTOR COMPANY (FORD) RESPONSE TO RQ24-008 Request 10Request 10

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; and
- f) A brief 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.

The documentation Ford is providing is from the period of 10/17/2022 (the first date of BC-level fuel injector usage in production) forward. As this request does not relate to recall 22S73, material related solely to that recall is not considered responsive to the subject vehicle-focused request and is excluded.

Ford is providing the responsive non-confidential Ford documentation in the Non-Confidential Documents folder contained in the Request 10 (Non-Confidential) 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 additional responsive documentation in the Confidential Documents folder contained in the Request 10 (Confidential) folder with a request for confidentiality under separate cover to the Agency's Office of the Chief Counsel pursuant to 49 CFR Part 512. Redacted copies of the confidential documents are also provided in the Non-Confidential Documents folder contained in the Request 10 (Non-Confidential) folder and are labeled "Public".

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 "RQ24-008 Privilege Log.pdf" contained in the Request 10 (Non-Confidential) folder.

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.

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.

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