FORD MOTOR COMPANY (FORD) RESPONSE TO RQ24-008 Supplemental IR Request 5

Request 5

Separate from the above responses, please provide a list of all underhood vehicle fires that relate or may relate to the alleged defect reported in both subject and peer vehicle populations that occurred **both** prior to the being serviced under the remedy program, as well as after being serviced under the remedy program. Please provide your response by pre-recall and post-recall fires, model, model year and VIN. This response must also include the cause and origin of the fire for each entry.

Answer

Request 5 asks for information regarding "all underhood vehicle fires that relate or may relate to the alleged defect." Ford is therefore including in its response information regarding fires in which a fuel leak caused by a cracked fuel injector could not be ruled out as the cause of the fire.

The information Ford is providing to this request demonstrates that the recall repair provided by Ford for both the subject vehicles and the peer vehicles (the addition of FMEM software and a drain tube) effectively remedies the defect at issue and removes any unreasonable fire risk associated with that defect. With respect to the 42,6552 subject vehicles, Ford is aware of 8 underhood engine fires in unrepaired vehicles that were or potentially could have been caused by a fuel leak from a cracked fuel injector - **a rate of 0.019%**. With respect to the 30,268 repaired subject vehicles, Ford is not aware of any fires caused or that could have been caused by a fuel leak from a cracked fuel injector – **a rate of 0.000%.**

Similarly, with respect to the 521,746 peer vehicles, Ford is aware of 81 underhood fires in unrepaired vehicles that were or potentially could have been caused by a fuel leak from a cracked fuel injector – **a rate of 0.016%.** With respect to the 440,293 repaired peer vehicles, Ford is aware of 11 underhood fires that potentially could have been caused by a fuel leak from a cracked injector – **a rate of 0.002%**. Although Ford is providing information for each of these 11 incidents because they potentially could have been caused by a cracked fuel injector, Ford has not determined that any of these 11 fires were caused by a cracked fuel injector. Moreover, as explained more fully below, Ford was unable to repurchase or inspect most of the vehicles involved in these 11 incidents and over half of them included reported conditions and symptoms that are inconsistent with a fire caused by a fuel leak from a cracked fuel injector. In three of these incidents, Ford has no information other than the identification of the vehicle and a report stating the vehicle caught fire.

Ford notes that in another investigation involving engine fires, the agency closed its investigation after the manufacturer issued a recall with a software repair that was intended to detect impending failure, alert the driver, and limit engine power. In its closing resume, the agency explained that:

> Regarding the issue of the efficacy of the recall remedies, ODI found that the majority of the recalled … vehicles, by model, experienced lower reported fire rates after the remedies were applied. Furthermore, ODI found that for most vehicles that did not receive the recall remedies, by model, experienced relatively high fire rates.

EA21-003 (Feb. 5, 2024 Closing Resume).

The summaries provided below highlight that the information available after some of these incidents is inadequate for Ford to provide an informed assessment of whether the fire was or could have been caused by a fuel leak from a cracked injector. Due to fire damage to the engine compartment and components, a post-fire vehicle inspection frequently is insufficient (by itself) to assess whether the fire was caused by a cracked injector. Furthermore, because the fuel injectors are shielded within the cylinder head, a vehicle inspection, without removal of the fuel injectors, will not allow Ford to identify the presence of a crack in an injector. Therefore, when Ford learns of an incident involving an underhood fire on a repaired vehicle, it frequently attempts to repurchase the vehicle or otherwise receive authorization to remove and inspect the fuel injectors. Where fuel inectors have been available for testing, Ford has been able to rule out cracked fuel injectors as a potential cause by determining that the fuel injectors were not cracked.

In other cases, however, Ford is unable to repurchase the vehicle or inspect the fuel injectors, and the assessment of whether a cracked injector was involved becomes more difficult. Ford may be prevented from purchasing the vehicle or completing its investigation because the vehicle or the fuel injectors are unavailable. For instance, the vehicle may have already been scrapped or repaired. In these cases, Ford typically assesses all available information to determine whether there is information indirectly suggesting a fuel leak or a cracked fuel injector. This includes, but is not limited to, witness accounts, photos, and first responder reports. As noted above, however, this information will not allow Ford to affirmatively confirm whether there was a crack in an injector because the injector is shielded within the cylinder head.

Subject Vehicles – underhood vehicle fires involving subject vehicles that were previously repaired under 24V187.

Recall 24V187 included Ford Bronco Sport and Escape vehicles built from October 17, 2022 through January 13, 2023. Each of these 42,652 vehicles was built with BC fuel injectors and without FMEM (failure mode effect management) software. The 24V187 recall repair for these vehicles was to install FMEM software to eliminate the unreasonable risk to motor vehicle safety created by a cracked fuel injector. In addition to the FMEM software, a drain tube was added to the engine to make this recall remedy consistent with the recall remedy in Recall 22V-859 and to mitigate potential customer confusion.

Ford has repaired 30,268 vehicles in the 24V187 recall population. Ford is not aware of any underhood engine fires in these repaired vehicles that relate or may relate to the alleged defect.

Subject Vehicles – underhood vehicle fires involving subject vehicles that were not previously repaired under 24V187.

Ford is aware of eight underhood engine fires in this vehicle population of unrepaired vehicles that may be responsive to this request. Ford confirmed the existence of a cracked fuel injector in two of these eight incidents. In six of these incidents, Ford was unable to inspect the fuel injectors or repurchase the vehicle and therefore lacked information sufficient to confirm the existence of a cracked fuel injector..

Responsive information regarding each of these eight incidents is included in the accompanying spreadsheet at “Pre-Repair Subject Vehicles”.

Peer Vehicles – underhood vehicle fires involving peer vehicles that were previously repaired under 22V859.

Recall 22V859 included Ford Escape and Bronco Sport vehicles built from November 19, 2018 through October 17, 2022. Each of these 521,746 vehicles was built with BB fuel injectors and without FMEM software. The 22V859 recall repair for these vehicles was to install FMEM software to eliminate the unreasonable risk to motor vehicle safety caused by a cracked fuel injector. In addition to the FMEM software, a drain tube was added to the engine to further mitigate any potential ignition risk from leaked fuel or fuel vapors.

Ford has repaired 440,293 vehicles in 22V859 recall population. Ford is aware of eleven underhood engine fires that may be responsive to this request. Ford has confirmed that, in one of these incidents, there was a cracked fuel injector, which cannot be ruled out as a potential cause of the fire. In another incident, the customer describes FMEM symptoms that appear to have mitigated the fire risk.

In the remaining nine incidents, there is insufficient information to draw conclusions on whether these alleged fires were caused by a cracked fuel injector and a resulting fuel leak because Ford has been unable to inspect the vehicle's injectors. Nonetheless, six of these remaining nine incidents include descriptions that are inconsistent with a fuel injector fire. For instance, the customer's descriptions of the incident do not report any fuel leak or odor, affirmatively report unrelated symptoms, or otherwise report facts that suggest alternative causes. Three of the remaining nine incidents report only that the vehicle caught on fire without providing any details about the circumstances or symptoms of the fire.

These eleven incidents are summarized in the following paragraphs. Additional information regarding each of these eight incidents is included in the accompanying spreadsheet at "Post-Repair Peer Vehicles".

Incident No. 1
Incident Date: May 26, 2023
Mode
VIN: [redacted]

Description of Incident
The dealer reported that, shortly before this incident, the subject vehicle had a long block engine replacement under warranty to address an issue relating to coolant leakage. There were no reported physical injuries, but the customer reported mental anguish following the fire.

Ford's Inspection of the Fuel Injectors
Ford has not been able to repurchase this vehicle or otherwise inspect the fuel injectors to determine if any of these injectors are cracked.

Ford Assessment of Incident
Based on currently available information, Ford's assessment is that it is unlikely that this incident was caused by a cracked fuel injector. The engine long block was replaced shortly before this incident which suggests that the fire was caused by an issue with the engine replacement. Moreover, the dealer's description does not include any reference to the odor of leaking fuel or any other signs of a fuel leak, which suggests that there were no cracks on the

injectors. Ford believes this fire is unrelated to a cracked fuel injector, but lacks sufficient information to confirm that assessment.

Incident No. 2
Incident Date: June 2, 2024
Model: 2022 Escape
VIN: [redacted]

Description of Incident
The dealer reported that the customer returned to the dealership after having the recall repair completed and reported that the vehicle had no acceleration above 15mph and "had code p0087." The dealer's work order also references the check engine light. There were no reported injuries.

Ford's Inspection of the Fuel Injectors
Ford has reached an agreement to repurchase this vehicle and likely will be testing the fuel injectors in the coming weeks.

Ford Assessment of Incident
Based on currently available information, including photos of the vehicle and the dealer's repair orders, Ford's assessment of this incident is that the recall repair, including the FMEM software, successfully detected a cracked fuel injector (the p0087 code) and limited the engine torque capacity (customer's report of limited acceleration), thereby mitigating any potential fire propagation. The photos show a blackened harness and minor burn damage to the engine compartment. Ford notes that the dealer repair order reflects that the vehicle was driven to the dealer following the incident, indicating that any fire damage was minimal. Ford may have additional information and a better assessment of this incident after it takes possession of the vehicle.

Incident No. 3
Incident Date: June 13, 2024
Model: 2022 Escape
VIN: [redacted]

Description of Incident
The dealer reported that the subject vehicle was a used vehicle, owned by the dealer. Dealer customers took the vehicle on a test drive and reported that they could smell gas while they were driving. The customers returned to the dealer and, when they parked the vehicle, they saw smoke coming from the dash. The customers exited the vehicle and noticed flames coming from under the hood of the vehicle. The fire department extinguished the fire. There were no reported injuries.

Ford's Inspection of the Fuel Injectors
Ford repurchased this vehicle and component testing confirmed a cracked fuel injector.

Ford Assessment of Incident
Based on currently available information, Ford's assessment of this incident is that there was a cracked fuel injector and that a resulting fuel leak is a potential cause of the fire. The fire damage to the vehicle prevents Ford from conclusively determining that the cracked injector was the cause of the fire.

Incident No. 4
Incident Date: June 7, 2024
Model: 2022 Bronco Sport
VIN [redacted]

Description of Incident
The customer reported that, while driving at 70mph, the vehicle experienced abnormal gear shifts and the customer noticed a fuel odor and a burning plastic odor coming from the air conditioning vents. The customer further reported that they tried to stop at a stop sign by depressing the brake pedal but that the vehicle did not respond, an ABS failure message displayed, and several other unknown warning lights illuminated. The customer further reported that he veered to the left while there was oncoming traffic, that he again attempted to stop by depressing the brake pedal, shifting to park, and engaging the electronic parking brake, but the vehicle failed to respond and continued moving forward at 40mph. The customer reported that they then noticed smoke and fire coming underneath the hood of the vehicle.

The customer reported that they jumped out of the vehicle, which continued to travel forward into a ditch where it burned until the fire was extinguished by the fire department. The customer reported receiving a scrape on their elbow.

Ford's Inspection of the Fuel Injectors
Ford learned of this incident through a VOQ. The customer never contacted Ford about this incident. Ford has not been able to locate and repurchase this vehicle or otherwise test the fuel injectors to determine if any of the injectors are cracked.

Ford Assessment of Incident
The available information relating to this incident is insufficient for Ford to assess whether the fire was caused by a cracked fuel injector and a resulting fuel leak. The VOQ reported repeated brake failures and associated warnings lights, which is inconsistent with a fire caused by a cracked fuel injector and suggests that this fire may have been caused by a brake fluid (a known combustible) leak rather than a cracked fuel injector. Although the customer reports a "gas odor" and the smell of burning plastic, this could also be attributed to a brake fluid leak and the resulting fire. Ford believes this fire is likely unrelated to a cracked fuel injector but lacks sufficient information to confirm that assessment.

Incident No. 5
Incident Date: June 1, 2024
Model: 2022 Ford Escape
VIN [redacted]

Description of Incident
The dealer reported that the "customer claims car caught on fire." No further information was provided about this incident. There were no reported injuries.

Ford's Inspection of the Fuel Injectors
Ford has not been able to repurchase this vehicle or otherwise inspect the fuel injectors to determine if any of the injectors are cracked.

Ford Assessment of Incident

The available information relating to this incident is insufficient for Ford to assess whether it was caused by a cracked fuel injector and a resulting fuel leak.

Incident No. 6
Incident Date: March 27, 2023
Mod
VIN: [redacted]

Description of Incident
Service records reflect that the original fuel injectors on this vehicle were replaced approximately one week before this incident. The customer's insurance company reported that the subject vehicle sustained fire damage and asserted that the fire may have resulted from a defect. There were no reported injuries.

Ford's Inspection of the Fuel Injectors
Ford has not been able to repurchase this vehicle or otherwise inspect the fuel injectors to determine if any of the injectors are cracked.

Ford Assessment of Incident
The available information relating to this incident is insufficient for Ford to assess whether it was caused by a cracked fuel injector and a resulting fuel leak. The information provided by the insurance company does not include any reference to the odor of leaking fuel or any other signs of a fuel leak at the time of the incident, which suggests that leaking fuel injectors were not the cause of the fire. Furthermore, the fact that the fire occurred one week after the dealer performed service work on the vehicle, suggests that the fire could have been related to the dealership's repairs. Ford believes this fire is unrelated to a cracked fuel injector but lacks sufficient information to confirm that assessment.

Incident No. 7
Incident Date: Feb. 3, 2024
Mode
VIN: [redacted]

Description of Incident
The customer reported that their son was driving the vehicle at approximately 60mph and saw smoke coming from under the hood. The customer's son drove the vehicle to the shoulder of the road and then exited the vehicle before it caught on fire. The customer further reported that the fire department extinguished the fire, and that the vehicle was towed to a nearby towing yard, but the cause of the fire was not determined. In the VOQ submitted, the customer alleged that "the vehicle was previously serviced for the NHTSA Campaign Number: 22V859000 (Fuel System, Gasoline)" and that "the vehicle had experienced that same failure listed in the recall." There were no reported injuries.

Ford's Inspection of the Fuel Injectors
Ford has not been able to repurchase this vehicle or otherwise inspect the fuel injectors to determine if any of the injectors are cracked.

Ford Assessment of Incident
The available information relating to this incident is insufficient for Ford to assess whether it was caused by a cracked fuel injector and a resulting fuel leak. Ford included this claim because the VOQ stated that the vehicle experienced the same failure listed in the recall. However, the

customer's description does not include any reference to the odor of leaking fuel, or any other signs of a fuel leak, or a check engine light. This suggests that this fire may not be related to a cracked fuel injector. Ford lacks sufficient information to confirm this assessment.

Incident No. 8
Incident Date: Nov. 9, 2023
Mode
VIN: [redacted]

Description of Incident
The customer reported that they exited the vehicle after turning the engine off. When the customer opened the driver's door, they saw smoke coming from the vehicle. The customer looked underneath the vehicle and saw flames. There were no reported physical injuries, but customer reported stress headaches after the incident.

Ford's Inspection of the Fuel Injectors
Ford has not been able to repurchase this vehicle or otherwise inspect the fuel injectors to determine if any of the injectors are cracked.

Ford Assessment of Incident
The available information relating to this incident is insufficient for Ford to assess whether the fire was caused by a cracked fuel injector and a resulting fuel leak. The customer's description does not include any reference to the odor of leaking fuel or any other signs of a fuel leak. Ford notes that the customer describes first seeing flames underneath the vehicle, which is inconsistent with a fire caused by a cracked fuel injector. In underhood fires caused by a cracked fuel injector, witnesses will report seeing smoke and flames coming from under the hood, not the underbody of the vehicle. The customer's description of where the fire originated suggests that the fire was not caused by a cracked fuel injector. Ford believes this fire is unrelated to a cracked fuel injector but lacks sufficient information to confirm that assessment.

Incident No. 9
Incident Date: May 24, 2029
Model: 2022 Escape
VIN: [redacted]

Description of Incident
The owner rental company initially reported that the "[v]ehicle began to smoke behind the screen," that the "vehicle was parked [and] locked itself," and that "it suddenly started to burn fire from the hood." The initial report also stated that the engine was not running and the keys were not in the ignition.

A claims adjuster later reported that "the car was being driven. The vehicle was started up a few minutes after stopping in a parking lot, the driver went around the block and smoke started to come out through the air vents behind the dashboard. The driver moved the car to the side of the road and exited the vehicle. It locked itself and then the flames got out of control."

There were no reported injuries.

Ford's Inspection of the Fuel Injectors

Ford has not been able to repurchase this vehicle or otherwise inspect the fuel injectors to determine if any of the injectors are cracked.

Ford Assessment of Incident
The available information relating to this incident is insufficient for Ford to assess whether the fire was caused by a cracked fuel injector and a resulting fuel leak. Initially, the owner of the vehicle reported that the vehicle was parked, that the engine was not running, and that the keys were not in the ignition when the fire started. If the engine is not running and the keys were not in the ignition, the vehicle would not be pumping fuel and a fuel fire is unlikely. Subsequently, a claims adjuster reported that the car was being driven and that smoke was coming through the air vents before the driver pulled over and existed the vehicle. In both accounts, it was reported that the vehicle "locked itself" before igniting. This account is inconsistent with the typical symptoms of an underhood fire caused by cracked fuel injectors. If the vehicle was turned off at the time of the fire or locked itself, the fire could be related to an electrical issue, neither of these descriptions include any reference to the odor of leaking fuel or any other signs of a fuel leak. Ford believes this fire is unrelated to a cracked fuel injector but lacks sufficient information to confirm that assessment.

Incident No. 10
Incident Date: Sept. 3, 2024
Mode
VIN: [redacted]

Description of Incident
The customer reported that the "first symptom" was that the brakes on the subject vehicle failed, that they coasted to a stop in a safe place after the brakes failed, and that then the vehicle caught on fire. There were no reported injuries.

Ford's Inspection of the Fuel Injectors
Ford has made an offer to repurchase this vehicle and is waiting for the customer's response. Ford has not yet inspected the fuel injectors.

Ford Assessment of Incident
The available information relating to this incident is insufficient for Ford to assess whether it was caused by a cracked fuel injector and a resulting fuel leak. The reported brake failure as a "first symptom" is inconsistent with a fire caused by a cracked fuel injector and suggests that this fire may have been caused by a brake fluid (a known combustible) leak rather than a cracked fuel injector. The customer's description does not include any reference to the odor of leaking fuel or any other signs of a fuel leak. Ford may have additional information and a better assessment of this incident if the customer accepts Ford's offer to repurchase the vehicle and Ford is able to test the fuel injectors. Ford believes this fire is unrelated to a cracked fuel injector, but lacks sufficient information to confirm that assessment.

Incident No. 11
Incident Date: Unknown
Mode
VIN: [redacted]

Description of Incident
Service records reflect that the customer had the fuel injectors replaced in the subject vehicle on March 25, 2024 pursuant to customer satisfaction program 22N18.

By letter dated June 14, 2024, the customer's attorney wrote to Ford asserting that 22V859 failed to provide an adequate remedy and alleging various consumer protection claims under California law on behalf of the customer "and all others similarly situated." This letter made no reference to any fire in either the consumer's vehicle or the vehicle of any other "similarly situated" customer.

More than four months later, on September 5th, 2024, the customer's attorney provided Ford with a photo of a burned vehicle, represented that it was a photo of the subject vehicle, and stated that the customer believed the fuel injectors were the cause of the fire because the fire started under the hood. The attorney agreed to provide repair records for the March 2024 injector replacement at a later date, but not agree to provide other repair records or any other details regarding the fire. The parties agreed to conduct a joint inspection of the fuel injectors, however that inspection has not occurred.

Ford's Inspection of the Fuel Injectors
Ford is attempting to get additional information and is attempting to conduct a joint inspection of the fuel injectors. Ford has not yet inspected the fuel injectors.

Ford Assessment of Incident
The available information relating to this incident is insufficient for Ford to assess whether the fire was caused by a cracked fuel injector and a resulting fuel leak. Ford is working to get an agreement on an inspection protocol for the subject vehicle's fuel injectors. Ford may have additional information and a better assessment of this incident once Ford is able to test the fuel injectors, but lacks sufficient information to draw conclusions.

Peer Vehicles – underhood vehicle fires involving peer vehicles that were not previously repaired under 22V859.

In this vehicle population of unrepaired vehicles, Ford is aware of eighty-one underhood engine fires that relate or may relate to the alleged defect. Through post-inspection testing, Ford confirmed the existence of a cracked fuel injector in the vehicle involved in five of these incidents. In one additional incident, Ford confirmed the presence of a torn o-ring in the fuel injector. Ford's assessment for an additional thirteen of these incidents, based on available information and the described symptoms, is that the fire likely was caused by a cracked fuel injector. In three additional incidents, Ford's assessment, based on available information and the described symptoms, is that the incident may have been caused by an earlier fuel system repair. In the remaining fifty-nine incidents, Ford was unable to inspect the vehicle, was also unable to remove and test the fuel injectors, and therefore has insufficient information to assess the likely cause or origin of the fires in these incidents.

Responsive information regarding each of these eighty-one incidents is included in the accompanying spreadsheet at "Pre-Repair Peer Vehicles".

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