

FORD MOTOR COMPANY (FORD) RESPONSE TO RQ24014-03 Request 1 Part 1Request 1

Provide updated field and warranty data, as requested in Request No. 2, Request No. 3, and Request No. 5 of the information request letter RQ24014-01, dated November 20, 2024.

Answer

In preparing the Part 1 response to this request, Ford updated the requested field and warranty data for subject vehicles produced after October 20, 2022. Updated information for subject vehicles produced up to October 20, 2022, will be submitted on June 6, 2025.

Ford has undertaken to provide responsive documents received after those documented in its response to RQ24014-01 up to and including May 7, 2025, the date of this inquiry. Responsive documents are identified using search criteria consistent with that described in Ford's response to RQ24014-01.

Specific to updating data previously provided in RQ24014-01 Request No. 2 and Request No. 3:

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 the file "RQ24014-3 Request 1 Part 1 Figure 1". Ford has not identified any owner reports or legal claims alleging crash, injury, fatality, fire, or damage. Additional information on the identified reports is detailed in the file "RQ24014-3 Request 1 Part 1 Potentially Responsive Reports".

For 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 file "RQ24-014-03 Part 1 Question 1 – Lawsuits and Claims Listing". To the extent available, copies of complaints or first notices relating to matters shown on the log are provided in the file "RQ24-014-03 Part 1 Question 1 Lawsuits and Claims Files". With regard to these lawsuits and claims, Ford has not contacted outside law firms to obtain additional documentation.

Specific to updating data previously provided in RQ24014-01 Request No. 5:

For purposes of identifying potentially responsive claims related to the alleged defect, Ford has gathered warranty claims using GSAR, formerly Analytical Warranty Systems (AWS), for the subject vehicles.

A summary of the total potentially responsive claims for the subject vehicles is shown below:

Vehicle Model	Model Year	Potentially Responsive
Bronco Sport	2022	1
	2023	45
	2024	20
Maverick	2023	2

The additional requested information for each potentially responsive warranty claim is detailed in the file "RQ24014-3 Request 1 Part 1 Potentially Responsive Warranty Claims".

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