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August 9, 2024

Mr. Peter Kivett, Chief
Vehicle Defect Division C
Office of Defects Investigation
National Highway Traffic Safety Administration
1200 New Jersey Avenue SE, W45-302
Washington, DC 20590

Dear Mr. Kivett:

Subject: PE24-012

This constitutes Ford Motor Company's (Ford) response to Requests 1, 5, 9, 10, 11, 13, 14, and 15 in the Agency's letter dated June 4, 2024, regarding its investigation of the Ford Mustang Mach-E vehicles equipped with Co-Pilot360 Active 2.0. Responses to other outstanding requests will follow under separate cover.

Ford's response to this Preliminary Evaluation information request was prepared pursuant to a diligent search for the information requested. While we have employed our best efforts to provide responsive information, the breadth of the Agency's request and the requirement that information be provided on an expedited basis make this a difficult task. We nevertheless have made a substantial effort to provide thorough and accurate information, and we would be pleased to meet with Agency personnel to discuss any aspect of this Preliminary Evaluation.

The scope of Ford's investigation conducted to locate responsive information focused on Ford employees most likely to be knowledgeable about the subject matter of this inquiry and on review of Ford files in which responsive information ordinarily would be expected to be found and to which Ford ordinarily would refer. Ford notes that although electronic information was included within the scope of its search, Ford has not attempted to retrieve from computer storage electronic files that were overwritten or deleted. As the Agency is aware, such files generally are unavailable to the computer user even if they still exist and are retrievable through expert means. To the extent that the Agency's definition of Ford includes suppliers, contractors, and affiliated enterprises for which Ford does not exercise day-to-day operational control, we note that information belonging to such entities ordinarily is not in Ford's possession, custody, or control.

Ford has construed this request as pertaining to vehicles manufactured for sale in the United States, its protectorates, and territories.

Ford notes that some of the information being produced pursuant to this inquiry may contain personal information such as customer names, addresses, telephone numbers, and complete Vehicle Identification Numbers (VINs). Ford is producing such personal information in an unredacted form to facilitate the Agency's investigation with the understanding that the Agency will not make such personal information available to the public under FOIA Exemption 6, 5 U.S.C. 552(b)(6).

Answers to your specific questions for Requests #1 - #17 are in (or will be included with) the folders included in this submission or future submissions. As requested, after each numeric designation, we have set forth verbatim the request for information, followed by our response. Unless otherwise stated, Ford has undertaken to provide responsive documents dated up to and including June 4, 2024, the date of your inquiry. Ford has searched within the following offices for responsive documents: Environment, Safety Engineering and Compliance, Ford Customer Service Division, Global Core Engineering, Office of the General Counsel, Ford Marketing, and North American Product Development.

The agency defined "Subject vehicles" as "All model year (MY) 2021-2024 Ford Mustang Mach-E vehicles equipped with Co-Pilot360 Active 2.0 and/or BlueCruise manufactured for sale or lease in the United States, including, but not limited to, current U.S. territories and possessions".

The agency defined "Peer vehicles" as "All other Ford and Lincoln vehicles equipped with any partial driving automation feature that offers lane and speed maintenance manufactured for sale or lease in the United States, including, but not limited to, current U.S. territories and possessions".

The agency defined the "Subject system" as "All hardware, software, data, and any other related systems that contribute to the performance of any partial driving automation feature that offers lane and speed maintenance equipped on any Ford or Lincoln vehicle, including but not limited to BlueCruise".

The agency defined the "Subject crashes" as "Incidents in which any subject or peer vehicle experiences a crash, regardless of fault/cause, in the United States (including any of its territories) with the subject system actually or allegedly engaged at any time during the period beginning 30 seconds immediately prior to the commencement of the crash".

If you have any questions concerning this response, please feel free to contact me.

Sincerely,



FOI.
Emily Frascaroli

Attachment