



**Emily Frascaroli, Global Director**  
Automotive Safety Office  
Environmental & Safety Compliance

**Ford World Headquarters**  
One American Road  
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January 7, 2025

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: PE24-030-02

The Ford Motor Company (Ford) response to Part 2 of the Agency's Information Request letter received October 22, 2024, concerning reports of allegations of rear-view camera failure in certain model year (MY) 2019 Ford Flex vehicles is attached.

Pursuant to the extension request submitted on December 3, 2024, and approved by the Agency on December 4, 2024, this is the second part of Ford's two-part submission and provides responses to Request 2 of the Information Request. Ford provided responses to Requests 1, 3, and 4 of the Information Request on December 10, 2024.

Ford's response to this Preliminary Evaluation 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. Ford reserves the right to update and supplement this response and any subsequent responses as new information may come available or where certain requests for information could not be fully provided within the time allowed. We nevertheless have made 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 are in the folders included in this submission. 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 information and documents dated up to and including October 22, 2024, the date of your inquiry. Ford has searched within the following offices for responsive documents: Environmental and Safety Compliance, Ford Customer Service Division, Global Core Engineering, Office of the General Counsel and North American Product Development.

This submission is the last part of Ford's two-part submission and provides responses to Part 2 Request 2 of the Information Request.

The Agency defined "subject vehicles" as "all MY 2019 Ford Flex vehicles manufactured for sale or lease in the United States, including, but not limited to, the District of Columbia, and current U.S. territories and possessions."

The Agency defined "peer vehicles" as "all other Ford and Lincoln vehicles equipped with the same subject components as the subject vehicles manufactured for sale or lease in the United States, including, but not limited to, the District of Columbia, and current U.S. territories and possessions."

The Agency defined "Subject component" as "all rear-view cameras, camera displays, and camera wiring installed on the subject vehicles." The Agency defined "Alleged defect" as "rear-view camera failure or malfunction."

In a November 7, 2024 meeting with Agency's investigator for this Preliminary Evaluation, Ford shared that no Peer vehicles exist that share all of the subject components as the subject vehicles. The Agency and Ford agreed to define Peer vehicles as the following vehicle lines that share the same subject rear-view camera:

- 2015-2018 Ford Flex
- 2019 Ford Fiesta
- 2019 Ford Taurus
- 2019 Lincoln MKT

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

Sincerely,

For:  
Emily Frascaroli  
Attachment



Jan-07-2025