U.S. Department of Transportation
National Highway Traffic Safety Administration

NHTSA

January 6, 2026

Tom Single

Deputy Director, Global Automotive Safety Office

Ford Motor Company

330 Town Center Drive

Suite 500

Dearborn, MI 48126

Subject: Information Request ID EA25001-12

Dear Mr. Single,

As you are aware, the Office of Defects Investigation (ODI) of the National Highway Traffic Safety Administration (NHTSA) has an open Engineering Analysis (EA25001) investigating allegations of collisions involving certain model year (MY) 2021-2025 Ford Mustang Mach-E vehicles equipped with BlueCruise. ODI has reviewed Ford's previously-submitted materials, including those responsive to ODI's June 18, 2025 letter, and now requests that Ford submit the following additional or updated information.

Unless otherwise stated in the text, the following definitions apply to these information requests:

- Subject vehicles: all MY 2021-2025 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.
- Peer vehicles: all other Ford and Lincoln vehicles equipped with any version of the BlueCruise partial driving automation system manufactured for sale or lease in the United States, including, but not limited to, current U.S. territories and possessions.
- Subject system: all hardware, software, data, and any other related systems that contribute to the performance of the BlueCruise partial driving automation system.
- Alleged defect: failure of the subject system to avoid or mitigate a crash with a vehicle or object in front of the subject vehicle.

- **Ford:** Ford Motor Company, all of its past and present officers and employees, whether assigned to its principal offices or any of its field or other locations, including all of its divisions, subsidiaries (whether or not incorporated) and affiliated enterprises and all of their headquarters, regional, zone and other offices and their employees, and all agents, contractors, consultants, attorneys and law firms and other persons engaged directly or indirectly (e.g., employee of a consultant) by or under the control of Ford (including all business units and persons previously referred to), who are or were involved in any way as of January 1, 2016, with any of the following related to the subject system in the subject and peer vehicles:

  a. Design, engineering, analysis, modification or production (e.g., quality control);
  b. Testing, assessment or evaluation;
  c. Consideration or recognition of potential or actual defects, reporting, record-keeping and information management, (e.g., complaints, field reports, warranty information, part sales), analysis, claims, lawsuits or arbitrations; or
  d. Communication to, from or intended for zone representatives, fleets, dealers, or other field locations, including but not limited to people who have the capacity to obtain information from dealers.

- **Document:** "Document(s)" is used in the broadest sense of the word and shall mean all original written, printed, typed, recorded, or graphic matter whatsoever, however produced or reproduced, of every kind, nature, and description, and all non-identical copies of both sides thereof, including, but not limited to, papers, letters, memoranda, correspondence, communications, electronic mail (e-mail) messages (existing in hard copy and/or in electronic storage), faxes, mailgrams, telegrams, cables, telex messages, notes, annotations, working papers, drafts, minutes, records, audio and video recordings, data, databases, other information bases, summaries, charts, tables, graphics, other visual displays, photographs, statements, interviews, opinions, reports, newspaper articles, studies, analyses, evaluations, interpretations, contracts, agreements, jottings, agendas, bulletins, notices, announcements, instructions, blueprints, drawings, as-builts, changes, manuals, publications, work schedules, journals, statistical data, desk, portable and computer calendars, appointment books, diaries, travel reports, lists, tabulations, computer printouts, data processing program libraries, data processing inputs and outputs, microfilms, microfiches, statements for services, resolutions, financial statements, governmental records, business records, personnel records, work orders, documents generated through litigation, arbitration, or mediation, pleadings, discovery in any form, affidavits, motions, responses to discovery, all transcripts, administrative filings and all mechanical, magnetic, photographic and electronic records or recordings of any kind, including any storage media associated with computers, including, but not limited to, information on hard drives, floppy disks, backup tapes, and zip drives, electronic communications, including but not limited to, the Internet and shall include any drafts or revisions pertaining to any of the foregoing, all other things similar to any of the foregoing, however denominated by Ford, any other data compilations from which information can be obtained, translated if necessary, into a usable form and any other documents. For purposes of this request, any document that contains any note, comment, addition, deletion, insertion, annotation, or otherwise comprises a non-identical copy of another document shall be treated as a separate document subject to production. In all cases where original and any non-identical copies are not available, "document(s)" also means any identical copies of the original and all non-identical copies thereof. Any document, record, graph, chart, film or photograph originally produced in color must

be provided in color. Furnish all documents whether verified by Ford or not. If a document is not in the English language, provide both the original document and an English translation of the document.

- Other Terms: To the extent that they are used in these information requests, the terms "claim," "consumer complaint," "dealer field report," "field report," "fire," "fleet," "good will," "make," "model," "model year," "notice," "property damage," "property damage claim," "rollover," "type," "warranty," "warranty adjustment," and "warranty claim," whether used in singular or in plural form, have the same meaning as found in 49 C.F.R. § 579.4.

In order for my staff to evaluate the alleged defect, certain information is required. Pursuant to 49 U.S.C. § 30166, please provide numbered responses to the following information requests. Insofar as Ford has previously provided a document to ODI, Ford may produce it again or identify the document, the document submission to ODI in which it was included and the precise location in that submission where the document is located. When documents are produced, the documents shall be produced in an identified, organized manner that corresponds with the organization of this information request letter (including all individual requests and subparts). When documents are produced and the documents would not, standing alone, be self-explanatory, the production of documents shall be supplemented and accompanied by explanation.

Please repeat the applicable request verbatim above each response. After Ford's response to each request, identify the source of the information and indicate the last date the information was gathered.

1. Provide a detailed summary of any testing of the response of an adaptive cruise control (ACC) system to a stationary vehicle completed by, or on behalf of Ford, and regardless of whether such system was in a Ford vehicle. The summary should include the test objective(s), the intended test matrix including host vehicles speeds and all other test conditions, when the testing was started, when the testing was completed, where the testing occurred, what vehicle/equipment was used as the stationary lead vehicle target, how ACC systems and vehicles were selected for testing, and what equipment was used to collect data during the testing.

2. Provide a table documenting the results of each test completed by, or on behalf of Ford as part of the testing referenced in response to Request No. 1. For each completed test, provide the following:

    a. Vehicle make, model, model year, and trim;
    b. Name of partial driving automation system tested (including version designation as applicable);
    c. Host vehicle test speed;
    d. Selected ACC gap setting;
    e. Onset of ACC braking (distance from target);
    f. Onset of Brake Capacity Warning (distance from target);
    g. Onset of Automatic Emergency Braking (distance from target);
    h. Onset of Forward Collision Warning (distance from target);
    i. Whether the crash was avoided without manual intervention;
        1. If the crash was not avoided without manual intervention, the actual or estimated impact speed;

j. If there was manual intervention:
   1. The type of manual intervention applied; and
   2. Onset of manual intervention (distance from target).

3. For each test responsive to Request No. 2 involving a MY 2018-2026 vehicle manufactured by Ford, General Motors, or Tesla, provide the following:

   a. All videos of the test; and
   b. Plotted data from the test including vehicle speed, longitudinal acceleration, lateral acceleration, distance from target, and time to collision.

4. Provide a detailed description of all planned software/calibration changes or updates that alter the intended behavior of the subject system in response to stationary targets. For each such planned change or update, provide the following:

   a. Whether the implementation of the change or update requires any specific system hardware version;
      1. If yes, provide a detailed explanation of why;

   b. Whether the implementation of the change or update requires any specific system software version;
      1. If yes, provide a detailed explanation of why;

   c. A list of all available method(s) for which the change or update can be implemented to vehicles already in the field;
   d. The make, model, and model year of all subject and peer vehicles into which the change or update will be incorporated;
   e. The date or approximate date on which the change or update will be incorporated into vehicle production;
   f. The date(s) or approximate date(s) on which the change or update will be incorporated into vehicles already in the field;
   g. The reason(s) for the change or update;
   h. The intended effect of the change or update on the subject system's response to stationary targets; and
   i. All testing and simulation utilized to evaluate the effect of the change or update.

Legal Authority for This Request

This letter is being sent to Ford pursuant to 49 U.S.C. § 30166, which authorizes NHTSA to conduct any investigation that may be necessary to enforce Chapter 301 of Title 49 and to request reports. It constitutes a new request for information.

Civil Penalties

Ford's failure to respond promptly and fully to this letter could subject Ford to Civil Penalties pursuant to 49 U.S.C. § 30165 or lead to an action for injunctive relief pursuant to 49 U.S.C. § 30163. (Other remedies and sanctions are available as well.) The Vehicle Safety Act, 49 U.S.C. § 30165(a)(3), provides for Civil Penalties of up to $27,874 per violation per day, with a maximum of $139,356,994 for a related series of daily violations, for failing or refusing to perform an act required under 49 U.S.C. § 30166. See 49 C.F.R. § 578.6(a)(3). This includes failing to respond completely, accurately, or in a timely manner to ODI information requests.

If Ford cannot respond to any specific request or subpart(s) thereof, please state the reason why it is unable to do so. If on the basis of attorney client, attorney work product, or other privilege, Ford does not submit one or more requested documents or items of information in response to this information request, Ford must provide a privilege log identifying each document or item withheld, and stating the date, subject or title, the name and position of the person(s) from, and the person(s) to whom it was sent, and the name and position of any other recipient (to include all carbon copies or blind carbon copies), the nature of that information or material, and the basis for the claim of privilege and why that privilege applies.

Confidential Business Information

If Ford's response contains any information that you claim is confidential business information (CBI), you will need to upload a "confidential version" file and a redacted "public version" file of each file for which Ford is requesting confidential treat to NHTSA's Safety Defect Investigations (SDI)Portal. For each file submitted through the SDI portal for which Ford is requesting confidential treatment, Ford must check the "Contains CBI" box. Once all Ford's files have been uploaded in the SDI portal, Ford will need to click on the "Finalize CBI Submission" button in the SDI portal and then submit its request letter for confidential treatment and Part 512 certification directly to the Office of the Chief Counsel in NHTSA's Confidential Business Information (CBI) Portal.

After Ford submits its request for confidential treatment and certificate in NHTSA's CBI Portal, the CBI Portal will assign a package identification number for your future reference and all "confidential version" and "public version" files submitted as part of the BI request will be accessible by both NHTSA's Office of the Chief Counsel and NHTSA's Office of Defects Investigation.

Please refer to EA25001-12 in Ford's response to this letter and in any request for confidential treatment that Ford may submit in response to this letter.

Please see enclosure 1 for additional instructions on submitting a request for confidential treatment that is compliant with 49 C.F.R. Part 512 (specifically, a request for confidential treatment must include the required parts that are discussed in enclosure 1).

Due Date

Ford's response to this letter must be submitted to this office by February 3, 2026. If Ford finds that it is unable to provide all of the information requested within the time allotted, Ford must request an extension from me through the Safety Defects Investigation Portal no later than five business days before the response due date. If Ford is unable to provide all of the information requested by the original deadline, it must submit a partial response by the original deadline with whatever information Ford then has available, even if an extension has been granted.

If you have any technical questions concerning this matter, please email Joseph Teitelman of my staff at joseph.teitelman@dot.gov.

Sincerely,

Tanya Topka

Tanya Topka, Director
Office of Defects Investigation

ENCLOSURE 1 - INFORMATION FOR REQUESTS FOR CONFIDENTIAL TREATMENT

If you believe that your response contains any material that you claim is confidential business information, submit these materials to NHTSA's Office of the Chief Counsel in accordance with 49 C.F.R. Part 512. **All requests for confidential treatment should be submitted directly to the Office of the Chief Counsel via NHTSA's Confidential Business Information (CBI) Portal. If you do not currently have a user account in the CBI portal, you may send a registration request to the CBI Portal's Help Desk at cbi-helpdesk@dot.gov.**

Prior to directly submitting your request for confidential treatment to the Office of the Chief Counsel in the CBI Portal, you will need to upload all "confidential version" and "public version" files in NHTSA's Safety Defect Investigations (SDI) Portal.

Requests for confidential treatment are governed by Part 512. A current version of this regulation is available on the internet at http://www.ecfr.gov. by selecting Title 49 "Transportation," next selecting "Parts 500 - 599" and finally selecting Part 512 "Confidential Business Information."

How to request confidential treatment:

NHTSA is treating electronic submission as an acceptable method for submitting confidential business information to the agency under Part 512. If you claim that any of the information or documents provided in your response constitutes confidential business information within the meaning of 5 U.S.C. § 552(b)(4), or are protected from disclosure pursuant to 18 U.S.C. § 1905, you must submit supporting information together with the materials that are the subject of the confidentiality request, in accordance with Part 512, to the Office of the Chief Counsel. Requests for confidential treatment should be submitted to the Office of the Chief Counsel in NHTSA's CBI Portal. Do not send a hardcopy of a request for confidential treatment to NHTSA's headquarters.

Your request must include a request letter that contains supporting information, pursuant to Part 512.8. Your request must also include a certificate, pursuant to Part 512.4(b) and Part 512, Appendix A.

You are required to submit one unredacted "confidential version" of the information for which you are seeking confidential treatment. Pursuant to Part 512.6, the words "ENTIRE PAGE CONFIDENTIAL BUSINESS INFORMATION" or "CONFIDENTIAL BUSINESS INFORMATION CONTAINED WITHIN BRACKETS" (as applicable) must appear at the top of each page containing information claimed to be confidential. In the latter situation, where not all information on the page is claimed to be confidential, identify each item of information for which confidentiality is requested within brackets: "[ ]."

You are also required to submit one redacted "public version" of the information for which you are seeking confidential treatment. Pursuant to Part 512.5(a)(2), the redacted "public version" should include redactions of any information for which you are seeking confidential treatment (i.e., the only information that should be unredacted is information for which you are not seeking confidential treatment).

For questions about a request for confidential treatment, please contact Dan Rabinovitz in the Office of the Chief Counsel at Daniel.Rabinovitz@dot.gov.