

**FORD MOTOR COMPANY (FORD) RESPONSE TO PE25-007**

Request 2

2. State the number of each of the following, received by Ford, or of which Ford is otherwise aware, which relate to, or may relate to, the alleged defect in the subject and peer vehicles:

- a. Consumer complaints, including those from fleet operators;
- b. Field reports, including dealer field reports;
- c. Reports involving a crash, injury or fatality;
- d. Property damage claims;
- e. Third-party arbitration proceedings, both pending and closed, where Ford is or was a party to the arbitration; and
- f. Lawsuits, both pending and closed, in which Ford is or was a defendant or codefendant.

For subparts “a” through “f,” state the total number of each item (e.g., consumer complaints, field reports, etc.) separately. Multiple incidents involving the same vehicle are to be counted separately. Multiple reports of the same incident are also to be counted separately (i.e., a consumer complaint and a field report involving the same incident in which a crash occurred are to be counted as a crash report, a field report and a consumer complaint).

In addition, for items “c” through “f,” provide a summary description of the alleged problem and causal and contributing factors and Ford's assessment of the problem, with a summary of the significant underlying facts and evidence. For items “e” and “f,” identify the parties to the action, as well as the caption, court, docket number, and date on which the complaint or other document initiating the action was filed.

Answer

The requested number of items identified in searches for the alleged defect is provided in the file “PE25-007\_Request2\_Appendix B”.

Ford has identified no items alleging crash, injury, fatality, or property damage pertaining to the alleged defect in subject or peer vehicles.

Ford has provided an assessment of potentially responsive lawsuits in “PE25-007\_Request2\_Lawsuits”.

The following categorizations were used in the review of reports located in each of these searches:

Category	Definition
A1	Missing or Detached B-Pillar Trim
A2	Loose B-Pillar Trim

Consumer Reports: As the agency is aware, within FCSD's North American Customer Service Operations, there is a Customer Relationship Center (CRC) that is responsible for facilitating communication between customers, dealerships and Ford Motor Company. Among other things, the CRC handles telephonic, electronic, and written inquiries, suggestions, informational requests, and concerns ("contacts") from Ford and Lincoln-Mercury vehicle owners about their vehicles or sales and service experience. The contacts are handled by CRC customer service representatives who enter a summary of the customer contact into a database known as GCCT (formerly FMC360, and MORS/CUDL). The CRC assigns to each vehicle-related contact report a "symptom code" or category that generally characterizes the nature of the customer contact or vehicle concern, as described by the owner. The CRC does not undertake to confirm the accuracy of the description provided by the owner; they simply record what is reported. Therefore, given the complexity of the modern motor vehicle, it is Ford's experience that a significant percentage of owner contacts do not contain sufficient information to make a technical assessment of the condition of the vehicle or the cause of the event reported. Accordingly, although owner contact reports may be useful in identifying potential problems and trends, the records are not the empirical equivalent of confirmed incidents and/or dealership's diagnosis.

Records identified in a search of these databases, as described in Ford's response to Request 4, were reviewed for relevance and sorted in accordance with the categories described above. The relevant owner reports identified in this search for the alleged defect are provided in the GCCT/FMC360, and MORS/CUDL portions of the database contained in Ford's response to Request 3. The categorization of each report is identified in the "Category" field.

Field Reports: Within FCSD, there is a Vehicle Service & Programs Office that has overall responsibility for vehicle service and technical support activities, including the administration of field actions. That Office is the primary source within Ford of vehicle concern information originating from Ford and Lincoln-Mercury dealerships, field personnel, and other sources. The information is maintained in a database known as the Global Common Quality Indicator System (GCQIS). The GCQIS database includes reports compiled from more than 40 Company sources (e.g., Company owned vehicle surveys, service technicians, field service and quality engineers, and technical hot line reports, etc.) providing what is intended to be a comprehensive concern identification resource. As with GCCT contact reports, GCQIS reports are assigned a "symptom code" or category that generally reflects the nature of the concern.

The relevant field reports identified in this search for the alleged defect are provided in the GCQIS portion of the database contained in Ford's response to Request 3. The categorization of each report is identified in the "Category" field.

Customer Surveys:

In 2018, Ford's Voice of the Customer team launched a customer survey system to collect open-ended, verbatim feedback from customers at three (3), twelve (12), and thirty-six (36) months of vehicle ownership. The information is maintained in a database known as the Quality Net Promoter Score (QNPS) system. The QNPS database includes reports from current or former Ford and Lincoln vehicle owners. Each customer who participates in the survey is asked to describe what they like most about their Ford/Lincoln product, what they like the least about their Ford/Lincoln product, and if there is anything else the customer would like to tell Ford. Prior to the QNPS system, the Global Quality Research System (GQRS) and Management Global Quality Research System (MGQRS) databases collected feedback from customers on their new vehicle experience. The MGQRS database included reports from Ford's management employee lease vehicles until its phase-out in 2014. The GQRS database was replaced with QNPS in 2018.

The relevant field reports identified in this search for the alleged defect are provided in the QNPS, GQRS, and MGQRS portions of the database contained in Ford's response to Request 3. The categorization of each report is identified in the "Category" field.

Claims, Lawsuits, and Arbitrations: 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 claims in our Log of Lawsuits and Claims, provided in Ford's response to Request 3. The number of relevant lawsuits and claims identified is also provided in this log. To the extent available, copies of complaints or first notices relating to matters shown on the log are provided in Ford's response to Request 4. To the extent available, GCCT reports related to the matter on the log are provided in Ford's responses to Requests 3 and 4. With regard to these lawsuits and claims, Ford has not undertaken to contact outside law firms to obtain additional documentation.