

FORD MOTOR COMPANY (FORD) RESPONSE TO PE25-020

Request 4

Produce copies of all documents related to each item within the scope of Request No. 2. Organize the documents separately by category (i.e., consumer complaints, field reports, etc.) and describe the method Ford used for organizing the documents. Describe in detail the search methods and search criteria used by Ford to identify the items in response to Request No. 2.

Answer

Detailed descriptions of the search criteria, including pertinent parameters, used to identify the reports provided in response to Request 2 are described in the file titled "PE25-020_Request4_Appendix C_Search Criteria."

Copies of the documents are listed in the following file folders:

- PE25-020_Request4_Field Reports_Subject Vehicles
- PE25-020_Request4_Field Reports_Peer Vehicles
- PE25-020_Request4_Consumer Complaints_Subject Vehicles
- PE25-020_Request4_Consumer Complaints_Peer Vehicles
- PE25-020_Request4_Customer Surveys_Peer Vehicles
- PE25-020_Request4_Lawsuits and Claims_Peer Vehicles

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).

Consumer Compliant: Records identified in a search of the Global Contact Center Technology (GCCT), and FMC360 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 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: Records identified in a search of the Global Common Quality Indicator System (GCQIS) database, as described in Ford's response to Request 4, were reviewed for relevance and sorted in accordance with the categories described above. 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.

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. "PE25-020 Lawsuits and claims – Peer Vehicles" gathered in this manner were reviewed for relevance and categorized in accordance with the categories described above. There were no responsive lawsuits or claims for the subject vehicles.