

INFORMATION REDACTED PURSUANT TO THE FREEDOM OF INFORMATION ACT (FOIA), 5 U.S.C. 552(B)(6)



Emily Frascaroli, Director
Automotive Safety Office
Environmental & Safety Compliance

Ford World Headquarters
One American Road
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October 10, 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: PE25-007

The Ford Motor Company (Ford) response to the Agency's Information Request Letter (Received August 28th, 2025) concerning reports of allegations of detachment of the B-pillar trim piece in model year (MY) 2019 Ford Flex vehicles is attached.

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.

On Monday September 8th, 2025 Ford's Automotive Safety Office (ASO) team members met with Office of Defect Investigations (ODI) staff to discuss the scoping of peer vehicles. Peer vehicles were defined in the Agency's August 28th request as "all MY 2016-2018 Ford Flex, and any other vehicle with a substantially similar subject component." In this meeting and subsequent discussions, ASO team members communicated its planned definition of peer vehicles as follows: All MY 2011-2018 Ford Flex Vehicles. This rationale was based on analysis of the attachment scheme for Ford Flex B pillar trim components going back 15 calendar years. This analysis identified three key characteristics of the B pillar trim; 1: Attachment with two-

sided adhesive tape, 2: Lack of a “foam donut” spacer, and 3: Lack of mechanical clips as a part of the attachment scheme. ODI acknowledged this definition of peer vehicles.

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).

This submission provides responses to Requests 1 through 14 of your August 28th, 2025 information request. 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 August 28th, 2025, 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.

Sincerely,

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For:
Emily Frascaroli

Enclosure