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August 5, 2021

Mr. Alexander Ansley
Chief, Recall Management Division
National Highway Traffic Safety Administration
1200 New Jersey Avenue, S.E.
Room W48-302
Washington, DC 20590

Dear Mr. Ansley:

Subject: **Ford Motor Company notification of its intention to count vehicles in the “other reasons” portion of its unreachable vehicle count for NHTSA Recall 18V-022 administered under Ford Recall 18S02**

This letter supersedes the previous letter submitted on December 4, 2020, subject: *Ford Motor Company notification of its intention to count vehicles in the “other reasons” portion of its unreachable vehicle count for NHTSA Recall 18V-022 administered under Ford Recall 18S02.*

This submission addresses “other” sub-categories defined in the email from Kara Fischer dated June 6, 2019, subject: *Additional “other” submissions in Takata recalls.*

Recall Investigation VIN Attribute Tool (RIVAT)

Over the course of the past two years, Ford’s Global Data Insight & Analytics (GDIA) group has been developing a tool to classify the status of vehicles that have not been repaired or have not been accounted in the “Other” category under Paragraph 45 of the Third Amendment to the Coordinated Remedy Order (vehicles that have not been registered for three continuous years and that have no economic activity).

In its efforts to maximize recall completion rates, Ford has incorporated the recommendations proposed by the Takata Independent Monitor team, including owner canvassing, mobile repair, airbag module recovery from salvage yards, and monitoring used vehicle online sales. Each of these activities can be a potential source of owner and/or vehicle data, however no product is available commercially to aggregate these data sources. In response, GDIA developed a new in-house tool called the Recall Investigation VIN Attribute Tool (RIVAT).

Ford's GDIA group designed RIVAT to aggregate data from numerous sources. Data supporting the category designations outlined in this letter include those described below.

Source	Data Type
Rebuilders Automotive Supply	Airbag Inflator Recovery/Vehicle Salvage
MarketSource	Canvassing/Vehicle Repair
Bearden Investigative Agency	Canvassing
Ford Internal	Customer surveys (includes photo submissions)

Once the data has been loaded into the system, RIVAT assigns status codes based on an Owner/VIN/Part hierarchy that are consistent across all data inputs. For each VIN, RIVAT organizes the status codes in chronological order and uses a proprietary business rules algorithm to determine an outcome. RIVAT will continually update outcomes as each data source is refreshed. Although the primary purpose of RIVAT is to identify vehicles in the other "Other" category for accounting purposes, an additional benefit of RIVAT is to identify vehicles that were previously listed as exported, scrapped, stolen, or "Other" that have returned to service.

Sub-Category Descriptions

Ford is providing a table that summarizes "other" sub-categories for the recall, the factors that are considered for placing a vehicle in a specific category, and the current number of vehicles dispositioned in each sub-category for NHTSA recall number 18V-022 administered under Ford Recall 18S02.

For each category, respective evidence is tied to a VIN through Ford's Recall Investigation VIN Attribute Tool (RIVAT).

NHTSA Sub-category	Deployed
Ford RIVAT Outcome	Other Other: Deployed
VIN count (as-of Aug 4, 2021)	0
Factors	Airbags that are in a deployed state are determined based on photo evidence. Sources include salvage yards, canvassing activities, and customer submissions (via surveys or one-to-one correspondence with a representative of Ford).

NHTSA Sub-category	Removed
Ford RIVAT Outcome	Other Other: Missing
VIN count (as-of Aug 4, 2021)	1
Factors	Airbags that have been removed (missing) are determined based on photo evidence. Sources include salvage yards, canvassing activities, and customer submission (via surveys or one-to-one correspondence with a representative of Ford).

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NHTSA Sub-category	Retrieved through the salvage process and are tied to a VIN
Ford RIVAT Outcome	Other Other: Recovered
VIN count (as-of Aug 4, 2021)	24
Factors	Through Rebuilder's Automotive Supply (RAS), Ford collects airbags from salvage yards and other resellers. These airbags are tied to a VIN based on the physical vehicle that the airbag was removed from during recovery, if applicable, and based on the inflator serial number. Ford has the capability to tie inflator serial numbers to VINs based on vehicle build information.

No Double Counting

In order to ensure accurate vehicle accounting, Ford will review VINs assigned to the "other reasons" category against the destroyed/exported/stolen or other categories in its recall database so that vehicles are only counted once.

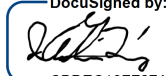
Safety Net Provision

In the event a vehicle currently assigned to the "other reasons" category has updated registration information, Ford will adjust the categorization of that vehicle to "active status" in its recall database. This provision does not apply in cases where the vehicle has been modified, the affected airbag is deployed, the affected airbag is missing, or the airbag or inflator has been recovered from salvage.

Ford is prepared to answer questions on a continuing basis regarding vehicles it is reporting as "other," including the specific numbers of vehicles in these categories and will supply supporting documentation upon request by the Agency.

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

Sincerely,

DocuSigned by:

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Desi Ujkashevic