Attachment to Transaction ID: 19-00502-23684-10 (Original Report) Ford Identification Code: 19S48

Chronology of Defect / Noncompliance Determination

Provide the chronology of events leading up to the defect decision or test data for the noncompliance decision.

October - December, 2018

NHTSA opened Preliminary Evaluation (PE18-011) on October 12, 2018 regarding reports of unintended tailgate opening while the vehicle was in motion on 2017 model year Super Duty vehicles equipped with a power release tailgate. The agency's investigation was to assess the scope, frequency and safety consequences of tailgate opening while the vehicle is in motion. NHTSA indicated receipt of five allegations of uncommanded tailgate opening while the vehicle is in motion is in motion, and referenced two similar reports to Transport Canada.

Ford initiated an in-depth investigation into this subject, including analyisis of field data and field return parts. Ford provided a response to NHTSA's Information Request on December 20, 2018. In that response, Ford summarized its investigation to date. The overall rate of reports of inadvertent tailgate opening while driving from any cause in the subject vehicles was low at approximately 2.5 R/1000. Analysis found some reports pertained to user inadvertently opening the tailgate by activation of properly functioning features such as the tailgate release switch in the instrument panel, the key FOB, or the B-pillar key pad. In other cases, analysis found water in the release switch or an in-line connector in the tailgate harness, resulting in a short circuit that could potentially release the tailgate latch. The rate of reports alleging inadvertent tailgate opening while driving caused by water entry into the electrical system was approximately 0.9 R/1000.

Inspections of employee vehicles were also conducted to further understand performance of vehicles with varying mileage and time in service. An employee vehicle that was reported to have experienced an inadvertent opening was also inspected and no water in the electrical system was found. The employee stated they likely inadvertently activated the tailgate opening feature on the key fob.

Based on an overall low rate of reports and the multiple ways in which a tailgate could open, Ford's assessment was that this subject did not present an unreasonable safety risk. Ford stated this subject would continue to be monitored and analyzed.

January - October, 2019

Ford continued to monitor field data and review returned parts. This included detailed engineering inspection of wiring harnesses and associated components from approximately 70 verified field occurences. Consistent with prior analyses, inspection of the complaint vehicle parts found evidence of water in various electrical components, including wiring harness connectors, eyelets, splices or the tailgate switch. Several were found to result from aftermarket modifications or prior vehicle damage. This information was used to further the investigation and to develop and incorporate various wiring and switch robustness actions into production.

Ford also reviewed FCA field service actions 18V486 and 19V347 relating to unintended tailgate opening on Ram pickup trucks with a power locking tailgate. Based on the recall paperwork, the

condition on those vehicles was found to relate to a mechanical fracture of a component within the power lock control assembly, with an estimated defect percentage of 100% as stated in their filing with the agency. In contrast, Ford's statistical analysis for Super Duty vehicles projected an estimated lifetime occurrence rate of approximately 3% for this issue.

Ford conducted periodic reviews of this subject with NHTSA, and discussed how best to address customer concerns should their vehicle experience this issue. Throughout September and October 2019, Ford and the agency continued to discuss this subject and Ford's desire to proceed with a customer satisfaction campaign to address any customer concerns.

November, 2019

Ford and the agency continued to discuss this subject and how to resolve this investigation.

On November 25, 2019, Ford's Field Review Committee reviewed the concern and approved a field action.

Ford is not aware of any reports of accident or injury related to this condition.

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