

*Ford Motor Company*

James P. Vondale, Director  
Automotive Safety Office  
Environmental & Safety Engineering

December 15, 2004

Ms. Kathleen C. DeMeter, Director  
Office of Defects Investigation Safety Assurance  
National Highway Traffic Safety Administration  
400 Seventh Street, S.W.  
Washington, D.C. 20590

Dear Ms. DeMeter:

Subject: RQ04-011:NVS-212pco

The Ford Motor Company (Ford) response to the agency's October 28, 2004 letter concerning reports of alleged front seat belt buckle failure in certain model year 2001 Ford, Lincoln and Mercury vehicles is attached.

Ford is providing reports alleging buckle latching issues, as well as ambiguous reports alleging an issue with the safety belt or buckle assembly that do not describe specific latch issues. Many of these ambiguous reports simply allege that some performance characteristic of the buckle or belt assembly did not meet a customer's expectations. Based upon past experience, Ford believes that many of the ambiguous reports, as well as many of the reports alleging non-latch conditions, do not relate to part malfunction, but rather relate to foreign objects, such as coins, buttons or other debris that became lodged in the buckle assembly.

Ford and the buckle supplier, TRW, are currently investigating these allegations of seat belt buckle failure after completion of recall 01S21. We are jointly collecting and analyzing parts to determine the causal factors leading to allegations of buckle failure. We will inform the agency of the results of this investigation when they are available.

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

Sincerely,

*R. A. Vondale*

James P. Vondale

Attachment



**FORD MOTOR COMPANY (FORD) RESPONSE TO RQ04-011**

Ford's response to this Recall Query (RQ04-011) information 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. We nevertheless have made every effort to provide thorough and accurate information, and we would be pleased to meet with agency personnel to discuss any aspect of this RQ.

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, as more fully described in this response. 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. However, differing from normal Ford procedure, much of the information required to answer certain of your requests was provided to Ford by TRW, the subject vehicle buckle supplier. TRW voluntarily assisted Ford in responding to your requests in order to provide you with the most accurate and complete information possible. Ford has construed this request as pertaining to vehicles manufactured for sale in the United States, its protectorates and territories.

Answers to your specific questions are set forth below. 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 documents dated up to and including October 28, 2004, the date of your inquiry. Ford has searched business units and/or affiliates within the following offices for responsive documents: Environmental and Safety Engineering, Ford Customer Service Division, Marketing and Sales Operations, Purchasing, Quality, Global Core Engineering, Office of the General Counsel, Vehicle Operations, North American Car Product Development, North American Truck Product Development.

**Request 1**

State, by model year and model, the number of subject vehicles Ford has manufactured for sale or lease in the United States under original recall 01V227 and remaining vehicles not under original recall for that model year. Separately, for each subject vehicle manufactured to date by Ford, state the following:

- a. Vehicle identification number (VIN);
- b. Make;
- c. Model;
- d. Model Year;
- e. Date of manufacture;
- f. Part of original recall (01V227);
- g. Whether recall remedy procedure was performed;
- h. Whether drive-side seat belt buckle was replaced;

- i. Whether passenger-side seat belt buckle was replaced;
- j. Date warranty coverage commenced; and
- k. The State in the United States where the vehicle was originally sold or leased (or delivered for sale or lease).

Provide the information for each model in Microsoft Access 2000, or a compatible format, entitled "PRODUCTION DATA" for each model.

#### Answer

The total number of model year 2001 vehicles sold in the United States (the 50 states and the District of Columbia) and its protectorates and territories (American Samoa, Guam, Northern Mariana Islands, Puerto Rico, and Virgin Islands) is provided in Appendix A (file: 2004-12-15\_Appendix\_A) on the enclosed CD. The appendix contains two tables. The information requested in parts "a" through "k" for vehicles included in recall 01S21 (NHTSA recall 01V227) is provided in the table named "Subject Vehicles Sales". Total US sales for 2001 model year vehicles not subject to recall 01S21 are provided in table named "MY 2001 Sales - Not in 01S21".

#### Request 2

State by model, 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 vehicles:

- a. Consumer complaints, including those from fleet operators;
- b. Field reports, including dealer field reports;
- c. Reports involving a crash, injury, or fatality, based on claims against the manufacturer involving a death or injury, notices received by the manufacturer alleging or proving that a death or injury was caused by a possible defect in a subject vehicle, property damage claims, consumer complaints, or field reports;
- d. Property damage claims;
- e. Third-party arbitration proceedings 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 "d," state the total number of each item (e.g., consumer complaints, field reports, etc.) separately. All reports/incidents involving a previously completed recall remedy vehicle are to be identified and counted. Multiple reports of the same vehicle but of different side of seat belt are to be identified and counted. Multiple reports of the same incident are also to be identified and 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 "d," 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

For purposes of identifying reports of incidents potentially involving the alleged defect and any related documents, Ford has gathered "owner reports" and "field reports" maintained by Ford Customer Service Division (FCSD), Intensified Customer Concern Definition (ICCD) data maintained by Ford's Quality Office, fleet reports maintained in a Fleet Test Database, and claim and lawsuit information maintained by Ford's Office of the General Counsel (OGC).

Descriptions of the FCSD owner and field report systems, the ICCD and the Fleet Test Database systems, and the criteria used to search each of these are provided electronically in Appendix B (file: 2004-12-15\_Appendix\_B) on the enclosed CD.

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

Category      Allegation

A1	Buckle allegedly comes unlatched while vehicle is in motion
A2	Buckle allegedly comes unlatched - not sure if vehicle in motion or parked
A3	Buckle allegedly won't latch at all/Hard to latch
A4	Buckle allegedly Inoperative/Failure not specific/Not releasing
B1	Alleged belt assembly failure/Inop, not specifically latch/buckle: Ambiguous <sup>1</sup>

<sup>1</sup> Ford is providing voluntarily electronic copies of these reports as "non-specific allegations" for your review because of the broad scope of the request. Based on our engineering judgment, the information in these reports is insufficient to support a determination that they pertain to the alleged defect.

Owner Reports: The search and review of the Ford Master Owner Relations Systems (MORS) database records, as described in Appendix B, identified the following number of owner reports in accordance with the categories described above:

MORS

Category	A1	A2	A3	A4
Reports	43	70	61	35

Copies of these owner reports are provided in the MORS portion of the electronic database contained in Appendix C (file: 2004-12-15\_Appendix\_C) on the enclosed CD. The categorization of each report is identified in the "Category" field. When we were able to identify that responsive (i.e., not ambiguous) duplicate owner reports for an alleged incident were received, each of these duplicate reports is marked accordingly, and the group is counted as one report. In other cases, certain vehicles may have experienced more than one incident and have more than one report associated with their VINs. These reports have been counted separately. In addition, ten category A1/A3/A4 MORS reports are duplicative of VOQ reports and are provided in Appendix C but are not reflected in the report count above.

Legal Contacts: Ford is providing in Appendix B a description of Legal Contacts and the activity that is responsible for this information, Litigation Prevention. To the extent that responsive (i.e., not ambiguous) owner reports reflect that they are Legal Contacts, Ford has gathered the

related files from the Litigation Prevention section. Based on this search, four files were located; copies are provided in Appendix D.

**ICCD Information:** A search of the ICCD database as described in Appendix B did not locate any responsive reports that may relate to the alleged defect.

**Fleet Reports:** In addition to fleet reports that may be contained in the owner reports or field reports identified in this response, Ford conducted a search of its Fleet Test Database as described in Appendix B for reports that may relate to the alleged defect in the subject vehicles. No fleet reports were identified.

**Field Reports:** The search and review of the Ford Common Quality Indicator System (CQIS) records, as described in Appendix B, identified the following number of field reports, excluding duplicates, in accordance with the categories described above:

**CQIS**

Category	A1	A2	A3	A4
Reports	9	13	34	9

Copies of these field reports are provided in the CQIS portion of the electronic database contained in Appendix C. The categorization of each report is identified in the "Category" field. When we were able to identify that responsive (i.e., not ambiguous) duplicate field reports for an alleged incident were received, each of these duplicate reports is marked accordingly, and the group is counted as one report. In other cases, certain vehicles may have experienced more than one incident and have more than one report associated with their VINs. These reports have been counted separately. In addition, four category A1, two category A2 and five category A3 CQIS reports are duplicative of VOQs and one category A1 CQIS report is duplicative of an owner report. These reports are provided in Appendix C but are not reflected in the report count above.

**Unified Database:** The Unified Database (UDB) was created to facilitate parts availability by tracking part sales and is not intended as a problem reporting system. However, because a small percentage of the records may contain verbatim comments that could potentially relate to the agency's inquiry, we are including any related reports in response to Request 2. A search of UDB, as described in Appendix B, was conducted and copies of potentially relevant reports and ambiguous reports are provided in the UDB portion of the electronic database contained in Appendix C on the enclosed CD.

**UDB**

Category	A1	A2	A3	A4
Reports	35	69	90	50

The categorization of each report is identified in the "Category" field. When we were able to identify that responsive (i.e., not ambiguous) duplicate UDB reports for an alleged incident were received, each of these duplicate reports is marked accordingly, and the group is counted as one report. In other cases, certain vehicles may have experienced more than one incident and have more than one report associated with their VINs. These reports have been counted separately. In addition, one category A1 UDB record and one category A3 UDB record are

duplicative of VOQs and are provided in Appendix C but are not reflected in the report count above.

**VOQ Data:** This information request had an attachment that included 20 Vehicle Owner's Questionnaires (VOQs). Ford made inquiries of its MORS database for customer contacts, and its CQIS database for field reports regarding the vehicles reflected on the VOQs. Ford notes that in some instances, where the VOQ does not contain the VIN, or the owner's last name and zip code, it is not possible to query the databases for owner and field reports specifically corresponding to the VOQs. Any reports located on a vehicle identified in the VOQs related to the alleged defect are included in the MORS and CQIS portions of the electronic database provided in Appendix C, as appropriate, and have been identified by a "Y" in the "VOQ Dup" field.

**Crash/Injury Incident Claims:** For purposes of identifying alleged accidents or injuries potentially related to the alleged defect, Ford reviewed responsive (i.e., not ambiguous) owner and field reports, lawsuits and claims, and warranty claims. Based on a reasonable and diligent search, Ford located seven owner (MORS) reports, one legal claim and one lawsuit specifically alleging some type of buckle complaint associated with an accident. Five owner reports, one legal claim and one lawsuit also allege some type of injury. Copies of these owner reports are included in the MORS portion of the electronic database provided in Appendix C. A summary of the lawsuit and the claim is provided in Appendix E (file: 2004-12-15\_Appendix\_E) on the enclosed CD.

As the agency is aware, the validity of seat belt buckle unlatching allegations is often subject to question. Frequently, post-accident analyses and investigations of an alleged seat belt buckle unlatching disclose evidence that the seat belt was not used at the time of the accident, or that the seat belt had performed properly.

**Claims, Lawsuits, and Arbitrations:** For purposes of identifying incidents potentially related to the alleged defect, Ford gathered claim and lawsuit information maintained by Ford's OGC. Ford's OGC is responsible for handling product liability lawsuits, claims, and consumer breach of warranty lawsuits and arbitrations against the Company.

Based on a reasonable and diligent search, Ford located two lawsuits and one legal claim, and no arbitrations that appear to relate to the alleged defect in the subject vehicles. Ford also located eight lawsuits and six legal claims that allege some type of ambiguous seat belt malfunction or restraint system failure. We are providing the requested detailed information, where available, on the responsive and ambiguous lawsuits and claims in our Log of Lawsuits and Claims, as Appendix E. Documents related to these lawsuits and claims are provided in Appendix F. With the exception of the *[REDACTED] v. Ford Motor Company* case, explained further, below, Ford has not undertaken to contact outside law firms to obtain additional documentation regarding these lawsuits and claims.

The Plaintiff in *[REDACTED] v. Ford Motor Company* includes, among a host of other allegations in the Complaint, a general and vague seatbelt defect allegation. In response to a court order to clearly specify the allegations in the case by supplementing its response to a set of Interrogatories served by Ford, Plaintiff did not identify any allegation related to the seatbelt. This is consistent with the fact that Plaintiff has not pursued a seatbelt allegation at any point in the litigation. Ford has attached as Attachment I and Attachment II to this response, a copy of a court transcript and Plaintiff's response to that Interrogatory made by Ford regarding the specific allegations that Plaintiff would pursue in this case, respectively.

Although, Plaintiff is not pursuing the seatbelt allegation in his lawsuit against Ford, out of an abundance of caution, Ford is providing information regarding [REDACTED] v. Ford Motor Company.

**NHTSA Request for Information on a 2001 Ranger and Grand Marquis Vehicle:**

On October 21, 2004, Mr. Peter Ong from the agency requested Ford to retrieve and analyze the complete front seat belt assemblies from a Ranger vehicle (VIN 1FTYR10C21T [REDACTED]) pertaining to VOQ 10089982. Ford retrieved both front seat belt assemblies from that vehicle and forwarded them to TRW for analysis. The analysis report from TRW is provided in Appendix G for the agency's review.

Mr. Ong also contacted Ford on December 6, 2004 requesting service information related to the subject of this inquiry on a certain 2001 Grand Marquis (VIN 2MEFM74WX1X [REDACTED]). Ford's database indicates that the recall (01S21) action consisting of an inspection was performed on November 21, 2002 on this vehicle by Peekskill Lincoln-Mercury Inc., Peekskill, NY and both buckles successfully passed the inspection procedure. Ford's warranty system does not indicate any seat belt related repairs on this vehicle subsequent to the recall inspection. Ford located and is providing two owner reports on this vehicle that may relate to the subject of this inquiry in the MORS portion of the Appendix C. One of the reports is a legal contact received following an accident that states "Seat belt was not worn according to police report". Although neither of these owner reports specifically alleges any type of seat belt buckle failure, Ford is providing these for the agency's review. A search of Ford's legal database by this vehicle's VIN did not identify any lawsuits or claims relating to this particular vehicle or incident.

**Request 3**

Separately, for each model and each item (complaint, report, claim, notice, or matter) within the scope of your response to Request No. 2, state the following information:

- a. Ford's file number or other identifier used;
- b. The category of the item, as identified in Request No. 2 (i.e., consumer complaint, field report, etc.);
- c. Vehicle owner or fleet name (and fleet contact person), address, and telephone number;
- d. Vehicle's VIN;
- e. Vehicle's make, model and model year;
- f. Vehicle's mileage at time of incident;
- g. Incident date;
- h. Report or claim date;
- i. Whether recall remedy procedure was previously performed;
- j. Whether driver-side seat belt buckle was replaced;
- k. Whether passenger-side seat belt buckle was replaced;
- l. Whether the driver or passenger-side seat belt is currently at issue;
- m. Whether a crash is alleged;
- n. Whether property damage is alleged;
- o. Number of alleged injuries, if any; and
- p. Number of alleged fatalities, if any.

Provide this information for each model in Microsoft Access 2000, or a compatible format, entitled "REQUEST NUMBER TWO DATA—Ranger..."

**Answer**

Ford is providing owner and field reports in the electronic database contained in Appendix C on the enclosed CD in response to Request 2. To the extent that the information requested in Request 3 is available, it is provided in that database. For information requested in items "I" through "I", to the extent it is available, it is provided in response to Request No. 1 in table "Subject Vehicles Sales" that also includes the recall repair information for all VINs.

**Request 4**

Produce copies of all documents related to each item within the scope of Request No. 2. Organize the documents separately by model and category (i.e., consumer complaints, field reports, etc.) and describe the method Ford used for organizing the documents.

**Answer**

Ford is providing electronic copies of responsive as well as ambiguous owner and field reports in the database contained in Appendix C on the enclosed CD in response to Request 2. Copies of documents related to the lawsuits and claims are provided in Appendix F.

**Request 5**

State, by model and model year, a total count for all of the following categories of claims, collectively, that have been paid by Ford to date for vehicles that have had the remedy recall procedure previously performed that relate to, or may relate to, the alleged defect in the subject vehicles: warranty claims; extended warranty claims; claims for good will services that were provided; field, zone, or similar adjustments and reimbursements; and warranty claims, "subsequent recall claim," or seat belt replacement made in accordance with the procedure specified in the original recall campaign.

Separately, for each such claim, state the following information:

- a. Ford's claim number;
- b. Vehicle owner or fleet name (and fleet contact person) and telephone number;
- c. VIN;
- d. Repair date;
- e. Vehicle mileage at time of repair;
- f. Repairing dealer's or facility's name, telephone number, city and state or ZIP code;
- g. Whether recall remedy procedure was previously performed;
- h. Whether driver-side seat belt buckle was replaced;
- i. Whether passenger-side seat belt buckle was replaced;
- j. Whether the driver or passenger-side seat belt is currently at issue;
- k. Labor operation number;
- l. Problem code;
- m. Replacement part number(s) and description(s);
- n. Concern stated by customer; and
- o. Comment, if any, by dealer/technician relating to claim and/or repair.

Provide this information for each model in Microsoft Access 2000, or a compatible format, entitled "WARRANTY DATA."

Answer

In responding to this information request, Ford electronically searched its Analytical Warranty System (AWS) for all claims meeting the criteria described in Appendix B. The resulting claims were then reviewed individually for allegations that may relate to the alleged defect. This search and review of the Ford AWS database records identified the following number of non-duplicative warranty claims in accordance with the categories described above:

Category	A1	A2	A3	A4
Reports	1,805	3,535	4,835	2,620

Electronic copies of these claims are provided in the AWS portion of the electronic database contained in Appendix C. The categorization of each report is identified in the "Category" field. When we were able to identify that duplicate claims for an alleged incident were received, each of these duplicate claims is marked accordingly and the group is counted as one report. In other cases, certain vehicles may have experienced more than one incident and have more than one claim associated with their VINs. These claims have been counted separately. In addition, four category A1 AWS claims are duplicative of VOQs and are provided in Appendix C but are not reflected in the report count above.

Ford assumes that providing the warranty claims in the electronic database format meets the requirements of this request, because the agency can review or order the claims as desired.

For information requested in items "g" through "j", to the extent it is available, that information is provided in response to Request No.1 in table "Subject Vehicles Sales" that also includes the recall repair information for all VINs. Requests for "claims for good will services that were provided; field, zone, or similar adjustments and reimbursements" received by Ford to date that relate to the alleged defect in the subject vehicles that were honored would be provided in the warranty section of Appendix C. Such requests that were not honored, if any, would be included in the MORS reports identified above in response to Request 2.

Request 6

Describe in detail the search criteria used by Ford to identify the claims identified in response to Request No. 5, including the labor operations, problem codes, part numbers and any other pertinent parameters used. Provide a list of all labor operations, labor operation descriptions, problem codes, and problem code descriptions applicable to the alleged defect in the subject vehicles. State, by make and model year, the terms of the new vehicle warranty coverage offered by Ford on the subject vehicles (i.e., the number of months and mileage for which coverage is provided and the vehicle systems that are covered). Describe any extended warranty coverage option(s) that Ford offered for the subject vehicles and state by option, model, and model year, the number of vehicles that are covered under each such extended warranty.

Answer

The criteria used for searching Ford's Analytical Warranty System (AWS) are described in Appendix B. All claims coded under the selected part numbers were included in this search regardless of labor operation or problem codes. The resulting claims were then reviewed individually for allegations that may relate to the alleged defect.

The standard new vehicle warranty coverage for 2001 model year Ford vehicles is three years or 36,000 miles, whichever occurs first. Warranty coverage on the restraint system, including the safety belts, is five years or 50,000 miles, whichever occurs first. A list of Extended Service Plans (ESP) that cover the subject components is provided in Appendix H along with time-in-service and mileage coverage by plan. This appendix also includes the count of subject vehicles that are covered by each ESP.

Request 7

Produce copies of all service, warranty, and other documents that relate to, or may relate to, the alleged defect in the subject vehicles and the training and use of the "special tool," that Ford has issued to any dealers, regional or zone offices, field offices, fleet purchasers, or other entities. This includes, but is not limited to, bulletins, advisories, informational documents, training documents, or other documents or communications, with the exception of standard shop manuals. Also include the latest draft copy of any communication that Ford is planning to issue within the next 120 days.

Answer

For purposes of identifying communications to dealers, zone offices, or field offices pertaining, at least in part, to the alleged defect in the subject vehicles, Ford has reviewed the following FCSD databases and files: The On-Line Automotive Service Information System (OASIS) containing Technical Service Bulletins (TSBs) and Special Service Messages (SSMs); Internal Service Messages (ISMs) contained in the CQIS; and Field Review Committee (FRC) files. We assume this request does not seek information related to electronic communications between Ford and its dealers regarding the order, delivery, or payment for replacement parts, so we have not included these kinds of information in our answer.

A description of Ford's OASIS messages, Internal Service Messages, and the Field Review Committee files and the search criteria used are provided in Appendix B.

OASIS Messages: Ford did not identify any SSMs or TSBs that relate to the alleged defect in the subject vehicles. However, Ford has identified one SSM and one TSB that relate to the subject component on the subject vehicles and is providing copies of those in Appendix I (file: 2004-12-15\_Appendix\_I).

Internal Service Messages: Ford did not identify any ISMs that relate to the subject component on the subject vehicles.

Field Review Committee: Ford did not identify any field service action communications that relate to front seat belt buckle failure after performance of the recall remedy (the subject of this inquiry.)

Other documents that may be responsive to this request are being provided in Ford's response to request No. 10.

### Request 8

Describe all assessments, analyses, tests, test results, studies, surveys, simulations, investigations, inquiries and/or evaluations (collectively, "actions") that relate to, or may relate to, the alleged defect or the proper use of the "special tool," in the subject vehicles that have been conducted, are being conducted, are planned, or are being planned by, or for, Ford. For each such action, provide the following information:

- a. Action title or identifier;
- b. The actual or planned start date;
- c. The actual or expected end date;
- d. Brief summary of the subject and objective of the action;
- e. Engineering group(s)/supplier(s) responsible for designing and for conducting the action; and
- f. A brief summary of the findings and/or conclusions resulting from the action.

For each action identified, provide copies of all documents related to the action, regardless of whether the documents are in interim, draft, or final form. Organize the documents chronologically by action.

### Answer

Ford is construing this request broadly and providing not only studies, surveys, and investigations related to the alleged defect, but also notes, correspondence, and other communications that were located pursuant to a diligent search for the requested information. Ford is providing the responsive non-confidential Ford documentation in Appendix J, which contains documents provided electronically on CD's and also paper documents. Ford is not providing documents responsive to this request that contain information protected by the attorney-client privilege and/or work-product doctrine. Such documents are described in a privilege log provided in Appendix K (file: 2004-12-15\_Appendix\_K) on the enclosed CD.

To the extent that the information requested in a-f is available, it is included in the documents provided. If the agency should have questions concerning any of the documents, please advise Ford.

Ford will be submitting additional responsive documentation as Appendix L with a request for confidentiality under separate cover to the NHTSA's Office of the Chief Counsel pursuant to 49 CFR, Part 512. Additionally, Ford has located other documents that do not appear to relate to this request, or that may tangentially mention the subject of this request without any substantive discussion. However due to the broad scope of this request and in an abundance of caution, a copy of these documents will be provided voluntarily in Appendix M with a request for confidentiality under separate cover.

### Request 9

Describe all modifications or changes made by, or on behalf of, Ford in the design, material composition, manufacture, quality control, supply, or installation

of the subject component, from the start of production to date, which relate to, or may relate to, the alleged defect in the subject vehicles including in detail the root cause and manufacturing corrective action used during the original recall campaign (01V227). For each such modification or change, provide the following information:

- a. The date or approximate date on which the modification or change was incorporated into vehicle production;
- b. A detailed description of the modification or change;
- c. The reason(s) for the modification or change;
- d. The part numbers (service and engineering) of the original component;
- e. The part number (service and engineering) of the modified component;
- f. Whether the original unmodified component was withdrawn from production and/or sale, and if so, when;
- g. When the modified component was made available as a service component; and
- h. Whether the modified component can be interchanged with earlier production components.

Also, provide the above information for any modification or change that Ford is aware of which may be incorporated into vehicle production within the next 120 days.

#### Answer

Ford understands this request to relate to changes or modifications to front outboard seat belt buckle assemblies that were originally manufactured on the vehicles that were subject to recall 01S21. The information required to respond to this request was provided to Ford by TRW, the buckle supplier. TRW voluntarily assisted Ford in responding to this request in order to provide the agency with the most accurate and complete information possible. A table of the changes or modifications is provided electronically with a request for confidentiality under separate cover as Appendix N (file: 2004-12-15\_Appendix\_N) to the NHTSA's Office of the Chief Counsel pursuant to 49 CFR, Part 512.

To aid in the review of buckle assemblies and their production date relative to the table of changes identified above, we note that the buckle supplier (TRW) uses a six digit date code on the back of the buckle cover to mark the production date of the subject components. The first two digits identify the calendar week of production, the next digit identifies the day of the week starting with Monday, the next two digits identify the calendar year of production and last digit identifies the shift on which the buckle was produced.

#### Request 1Q

Produce two of each of the following:

- a. Exemplar samples of the pre- and post-recall design version of the subject component;
- b. Field return samples of the subject component exhibiting the subject failure mode;
- c. Functional "half-section" sample (one only) of subject component, and
- d. Any special tool that have been released, or developed, by Ford for use in recall service inspection during 01V227 to the subject component/assembly which

relate, or may relate, to the alleged defect in the subject vehicles. Include all instructions/operating procedures that were available to the service technician.

Answer

The requested parts are provided with this response. Ford has included buckles of pre and post-recall design levels. In response to item "c", Ford has included a buckle without the outer cover, as a "half-section" sample buckle would no longer be a functional sample. Ford is including a copy of the field action service procedure for inspection and/or replacement of the buckles in Appendix O (file: 2004-12-15\_Appendix\_O) on the enclosed CD.

Request 11

State the number of each of the following that Ford has sold subsequent to the recall campaign notification of July, 2001, that may be used in the subject vehicles by component name, part number (both service and engineering/production), model and model year of the vehicle in which it is used and month/year of sale (including the cut-off date for sales, if applicable):

- a. Driver-side seat belt buckle; and
- b. Passenger-side seat belt buckle.

For each component part number, provide the supplier's name, address, and appropriate point of contact (name, title, and telephone number). Also identify by make, model and model year, any other vehicles of which Ford is aware that contain the identical component, whether installed in production or in service, and date the applicable dates of production or service usage.

Answer

As the agency is aware, Ford service parts are sold in the U.S. to authorized Ford and Lincoln-Mercury dealers. Ford has no means by which to determine how many of the parts were actually installed on vehicles, the vehicle model on which a particular part was installed, or the reason that the installation was made.

Ford is providing in electronic form in Appendix P (file: 2004-12-15\_Appendix\_P) on the enclosed CD the total number of Ford service replacement front seat belt buckles since the recall was announced by part number (both service and engineering) and calendar month and year of sale where available. A list of models and model years for which these parts are released and supplier names and contacts are also provided in this appendix. Ford notes that the part sales database does not contain sales information broken down by month for historic data. Parts used for recall 01S21 repairs are also included in this sales information.

Request 12

Furnish Ford's assessment of the alleged defect in the subject vehicle, including:

- a. The causal or contributory factor(s);
- b. The failure mechanism(s);
- c. The failure mode(s);
- d. The risk to motor vehicle safety that it poses;

- e. What warnings, if any, the operator and the other persons both inside and outside the vehicle would have that the alleged defect was occurring or subject component was malfunctioning; and
- f. The reports included with this inquiry (including if a scope issue exists).

Answer

The agency provided 20 VOQs with this inquiry. Ford searched its databases to obtain additional information concerning these reports. Based on review of information provided in these VOQs, we note that at least five relate to vehicles that were either not brought in for the recall remedy or for which the allegation of a buckle malfunction preceded the recall remedy. Additionally, two VOQs (770005 and 8023187) appear to relate to the same complaint on one vehicle (VIN: 1FTZF17241K [REDACTED]) and one VOQ (10011746) simply makes reference to the recall remedy without a related complaint. Ford notes that VOQ 567102 does not contain VIN information and therefore Ford was unable to search its databases for additional information concerning this report.

Based upon past experience, Ford believes that many of the reports alleging a non-latch condition relate to foreign objects such as coins, buttons or other debris that became lodged in the buckle assembly. Due to broad definition of the alleged defect, Ford is also providing, in this response, ambiguous reports describing seat belt buckle malfunction without an allegation of a failure to latch or unexpected unlatching (i.e., "buckle inoperative", "buckle broke" etc.) Again, based on past experience we know that it is possible that many of these reports likely relate to foreign objects lodged in the buckle.

Ford's investigation of allegations of seat belt buckle failure after completion of recall 01S21 is in process. Ford and the seat belt buckle supplier (TRW) are in the process of collecting and analyzing parts to better understand the allegations of buckle failure. We will inform the agency of the results of this investigation when they are available.

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