

Ford Motor Company

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OFFICE OF
INVESTIGATION

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

January 24, 2005

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

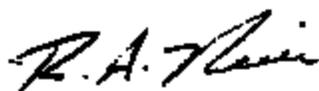
Dear Ms. DeMeter:

Subject: EA04-011:NVS-213gem

Attached is the Ford Motor Company (Ford) response to the agency's November 18, 2004 letter concerning allegations of inability of the park brake to hold a vehicle stationary in 1999 through 2003 model year F-150 vehicles, manufactured for sale or lease in the United States. We understand these vehicles are being used as a peer comparator in the agency's investigation EA04-011.

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

Sincerely,



James P. Vondale

Attachment



FORD MOTOR COMPANY (FORD) RESPONSE TO EA04-011

Ford's response to this peer vehicle 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 peer vehicle information request.

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. 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 November 18, 2004, the date of your inquiry. Ford has searched business units and/or affiliates within the following offices for responsive documents: Ford Customer Service Division, Marketing and Sales Operations, Quality, Global Core Engineering, Office of the General Counsel, North American Truck Product Development.

Request 1

State, by model and model year, the number of subject vehicles Ford has manufactured for sale or lease in the United States. Separately, for each subject vehicle manufactured to date by Ford, state the following:

- a. Vehicle identification number (VIN);
- b. Model;
- c. Transmission type;
- d. Two wheel or four wheel drive;
- e. Parking brake manufacturer, type, and model name;
- f. Date of manufacture;
- g. Date warranty coverage commenced; and
- h. The state in the United States where the vehicle was originally sold or leased (or delivered for sale or lease).

Provide this information in five separate files, each file corresponding to one of the subject model years in Microsoft Access 2003, or a compatible format, entitled "EA04-011.F-SERIES MY 20xx PRODUCTION DATA." See Enclosure 1, EA04-011 Data Collection Disc, for pre-formatted tables that provide further details regarding this submission.

Answer

Ford records indicate that the approximate total number of subject 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 the Virgin Islands) are as follows:

| | 1999 MY | 2000 MY | 2001 MY | 2002 MY | 2003 MY |
|-------|---------|---------|---------|---------|---------|
| F-150 | 489,582 | 453,827 | 587,231 | 488,455 | 490,729 |

The specific vehicle information requested by the agency has been provided electronically in Appendix A (file: 2005-01-24_Appendix_A.zip) on the enclosed CD.

Request 2

State 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 subject condition 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; and
- e. Third-party arbitration proceedings where Ford is or was a party to the arbitration; and lawsuits, both pending and closed, in which Ford is or was a defendant or codefendant.

For subparts "a" through "e", state the total number of each item (e.g., consumer complaints, field reports, etc.) separately. Multiple incidents involving the same vehicle are to be counted separately. Multiple reports of the same incident are also to be 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 "e", 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 d and e, 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 subject condition 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).

January 24, 2005

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: 2005-01-24_Appendix_B.doc) on the enclosed CD.

The following category/allegation was used in the review of reports located in each of these searches to determine responsive reports:

Category Allegation

| | |
|---|--|
| A | Park brake allegedly does not adequately hold vehicle in stationary position |
|---|--|

While Ford typically includes ambiguous reports (i.e. those for which it is unclear whether they relate to the subject condition) in response to a defect investigation concerning Ford vehicles, we are providing in this peer information request (IR) only those claims that specifically allege the subject condition as described in the IR letter.

Owner Reports: The search and review of the Ford Master Owner Relations Systems (MORS) database records, as described in Appendix B, identified 24 owner reports in accordance with the category described above:

Copies of these owner reports are provided in the MORS portion of the electronic database contained in Appendix C (file: 2005-01-24_Appendix_C.mdb) on the enclosed CD. The categorization of each report is identified in the "Category" field. When we were able to identify that 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. Additionally, one MORS report is duplicative of an AWS claim. This report is provided in Appendix C but is not included 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 owner reports indicate that they are Legal Contacts, Ford has gathered the related files from the Litigation Prevention section. Based on this search, 15 files were located; copies are provided in Appendix D.

ICCD Information: A search of the ICCD database, as described in Appendix B, located no responsive reports that may relate to the subject condition.

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 subject condition 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 three field reports in accordance with the category described above:

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 duplicate field reports for the subject condition 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. Additionally, two category "A" CQIS reports are duplicative of owner reports and two more are duplicative of AWS claims. 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 the 50 potentially relevant reports are provided in the UDB portion of the electronic database contained in Appendix C on the enclosed CD.

The categorization of each report is identified in the "Category" field. When we were able to identify that duplicate UDB reports for the subject condition 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.

Crash/Injury Incident Claims: For purposes of identifying alleged accidents or injuries potentially related to the subject condition, Ford reviewed owner and field reports, lawsuits and claims, and warranty claims. Based on a reasonable and diligent search, Ford located 19 owner (MORS) reports, two legal claims (both duplicative of MORS reports), and one lawsuit specifically alleging some type of parking brake inability to hold complaint associated with an allegation of an accident. One of the 19 owner reports and the one lawsuit also allege some type of minor injury. Copies of the owner reports are included in the MORS portion of the electronic database provided in Appendix C.

Claims, Lawsuits, and Arbitrations: For purposes of identifying incidents potentially related to the subject condition, 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 one lawsuit, two legal claims, and no arbitrations that appear to relate to the subject condition in the subject vehicles. A summary of the lawsuit and the claims is provided in Appendix E (file: 2005-01-24_Appendix_E.xls) on the enclosed CD.

Request 3

Separately, for 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 unintended movement of the vehicle occurred while the parking brake was engaged;
- j. Whether a crash is alleged;
- k. Whether property damage is alleged;
- l. Where an item was struck, identify the item;
- m. Number of alleged injuries, if any; and
- n. Number of alleged fatalities, if any.

Provide this information in Microsoft Access 2003, or a compatible format, entitled "EA04-011 F-SERIES REQUEST NUMBER TWO DATA." See Enclosure 1, EA04-011 1 Data Collection Disc, for a pre-formatted table that provides further details regarding this submission.

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.

Request 4

Produce copies of all documents related to each of items "c" through "e" within the scope of Request No. 2. Organize the documents separately by category (i.e., crash/injury/fatality reports, property damage claims, etc.) and describe the method Ford used for organizing the documents.

Answer

Ford is providing electronic copies of 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 that relate to, or may relate to, the subject condition 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 or repairs made in accordance with a procedure specified in a technical service bulletin or customer satisfaction 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. Labor operation number;
- h. Problem code;
- i. Replacement part number(s) and description(s);
- j. Concern stated by customer; and
- k. Comment, if any, by dealer/technician relating to claim and/or repair.

Provide this information in Microsoft Access 2003, or a compatible format, entitled "EA04-011 F-SERIES WARRANTY DATA." See Enclosure 1, EA04-011 Data Collection Disc, for a pre-formatted table that provides further details regarding this submission.

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 subject condition. This search and review of the Ford AWS database records identified 1,219 non-duplicative warranty claims in accordance with the category described above:

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. 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.

The requested customer concern codes and the warranty condition codes are provided in Appendix B. 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 subject condition 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 subject condition in the subject vehicles in Microsoft Access 2000, or a compatible format. 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).

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 subject condition.

The standard new vehicle warranty coverage that covers the subject components for 1999 through 2003 model year Ford vehicles is three years or 36,000 miles, whichever occurs first.

Request 7

Produce copies of all service, warranty, and other documents that relate to, or may relate to, the subject condition in the subject vehicles, 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 subject condition 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 subject condition in the subject vehicles.

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

Field Review Committee: Ford did not identify any field service action communications that relate to the subject condition in the subject vehicles.

Request 8

Describe each of the different parking brake systems used on the subject vehicles, whether they are traditional rear drum service brakes that incorporate a cable-actuated parking brake feature or a "drum in hat" rear disc arrangement. For each system identified, provide a schematic, model and manufacturer names, and swept area.

Answer

In the subject vehicles, Ford installed one of two park brake systems (depending on whether the vehicle was manufactured with rear drum or rear disc service brakes). For a rear drum service brake system (all 1999 model year F-150 vehicles manufactured through approximately November, 1998) the service brake also served as the parking brake. The parking brake was actuated by a foot operated controller and cable system.

As a running change for the 1999 model year, Ford introduced rear disc service brakes on certain model F-150 vehicles. The parking brake system for those vehicles used a drum in hat assembly with dual brake pads actuated by a foot operated controller and cable system.

Beginning in the 2000 model year, through the 2003 model year, Ford introduced rear disc brakes as standard equipment on all F-150 vehicles sold in the U.S. The drum in hat assembly parking brake was also standard equipment for those vehicles.

Illustrations for the parking brake system for both the rear drum and rear disc service brake vehicles are included electronically in Appendix G (folder: 2005-01-24_Appendix_G.doc) on the enclosed CD. The supplier for the brake controller and cables is Dura Automotive. The supplier for both the rear drum and disc brakes is Bosch. The swept area for the drum and disc parking brakes is 501 cm² and 215 cm², respectively.

Request 9

Identify the five largest fleets in the United States that utilize the subject vehicles. Separately identify the five largest fleets within the region encompassed by Washington DC, Delaware, Maryland, New Jersey, Pennsylvania, Virginia, Ohio, and West Virginia that utilize the subject vehicles. For each of the fleets identified, state the following:

- a. Fleet name and address;
- b. Point of contact name and telephone number; and
- c. Number of subject vehicles sold to that fleet by model name.

Answer

The response to this request is provided on the Excel spreadsheet provided in Appendix H (file: 2005-01-24_Appendix_H.xls) on the enclosed CD.

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