

Ford Motor Company

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OFFICE OF DEFECTS INVESTIGATION
SAFETY ASSURANCE

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

February 22, 2005

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

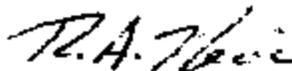
Dear Ms. DeMeter:

Subject: EA04-025:NVS-213gem

The Ford Motor Company (Ford) response to the agency's January 5, 2005, letter requesting certain information concerning Ford Super Duty vehicles is attached. Ford understands that there is no alleged defect with respect to any of its vehicles and is providing this information as part of the agency's investigation of another manufacturer's vehicles.

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

Sincerely,



James P. Vondale

Attachment



FORD MOTOR COMPANY (FORD) RESPONSE TO EA04-025

Ford's response to this Engineering Analysis 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 substantial effort to provide thorough and accurate information, and we would be pleased to meet with agency personnel to discuss any aspect of this Engineering Analysis.

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 January 5, 2005, the date of your inquiry. Ford has searched within the following offices for responsive documents: Ford Customer Service Division, Marketing and Sales Operations, Office of the General Counsel, Powertrain Operations, 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 model;
- d. Two wheel or four wheel drive;
- e. Transmission shift location (floor or steering column);
- f. PRNDL indicator style (electronic or mechanical);
- g. Date of manufacture;
- h. Date warranty coverage commenced; and
- i. The zip code in the United States where the vehicle was originally sold or leased (or delivered for sale or lease).

Provide this information in Microsoft Access 2003, or a compatible format, entitled "EA04-025 FORD PICKUPS PRODUCTION DATA." See Enclosure I, EA04-025 Data

Collection Disc, for pre-formatted tables that provide further details regarding this submission.

Answer

Ford records indicate that the approximate total number of 2003 and 2004 model year Ford F-250 and F-350 Super Duty vehicles equipped with automatic transmissions 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 597,637.

The number of subject peer vehicles sold in the United States by model and model year is shown below:

Model	2003 MY	2004 MY
F-250	191,069	182,750
F-350	101,444	112,374

The requested data for each subject peer vehicle is provided electronically in Appendix A (filename: 2005-02-22 Appendix A) on the enclosed CD. All subject peer vehicles use a column-mounted shifter with mechanical PRNDL indicator.

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 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; 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 alleging inadvertent vehicle movement while parked 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 (filename: 2005-02-22 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	Vehicle allegedly rolled away while parked.
A2	Vehicle movement alleged, unable to determine the extent of that movement.
B	Limited vehicle movement alleged, most likely the result of normal movement associated with the setting of the parking pawl.

Ford does not believe reports of the type that have been categorized as "B" are related to the subject of the agency's investigation, but is voluntarily providing copies for your information.

Owner Reports: Records identified in a search of the Master Owner Relations Systems (MORS) database, as described in Appendix B, were reviewed for relevance and categorized in accordance with the categories described above. The number of relevant owner reports identified in this search and review is provided in Appendix C (filename: 2005-02-22 Appendix C) on the enclosed CD. Copies of these categorized owner reports are provided in the MORS III portion of the electronic database also contained in Appendix C. The categorization of each report is identified in the "Category" field.

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 owner reports indicate that they are Legal Contacts, Ford has gathered the related files from the Litigation Prevention section. Non-privileged documents for files that were located that are related to the responsive owner reports are provided electronically in Appendix D (directory name: 2005-02-22 Appendix D).

ICCD Information: A search of the ICCD database as described in Appendix B located no reports that may relate to inadvertent movement of the subject peer vehicles while parked.

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 inadvertent movement of the subject peer vehicles while parked. No fleet reports were identified that may relate to inadvertent movement of the subject peer vehicles while parked.

Field Reports: Records identified in a search of the Customer Quality Indicator System (CQIS) database, as described in Appendix B, were reviewed for relevance and categorized in

accordance with the categories described above. The number of relevant field reports identified in this search and review is provided in Appendix C (filename: 2005-02-22 Appendix C) on the enclosed CD. Copies of these categorized field reports are provided in the CQIS portion of the electronic database also contained in Appendix C. The categorization of each report is identified in the "Category" field.

Field reports that are duplicative of owner reports are provided in Appendix C but are not included in the report count.

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 searched UDB for reports responsive to Request 2 as described in Appendix B. No potentially relevant reports were identified.

Crash/Injury Incident Claims: Ford has construed "crash" to mean any incident in which property damage is reported, regardless of the severity of that damage, or in which the vehicle came to rest against another object, regardless of whether any specific damage was noted. For purposes of identifying allegations of accidents or injuries that may have resulted from alleged inadvertent movement of subject peer vehicles while parked, Ford has reviewed responsive owner and field reports, lawsuits and claims, and warranty claims. A chart identifying potentially relevant allegations is being provided electronically as Appendix E (filename: 2005-02-22 Appendix E) on the enclosed CD. Copies of corresponding reports are provided in the MORS, CQIS, and Analytical Warranty System (AWS) portions of the electronic database provided in Appendix C.

Claims, Lawsuits, and Arbitrations: For purposes of identifying incidents alleging inadvertent movement of subject peer vehicles while parked, Ford has 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 no lawsuits, no claims or consumer breach of warranty lawsuits, and no arbitrations that appear to relate to allegations of inadvertent movement of subject peer vehicles while parked.

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 a crash is alleged;

- j. Whether property damage is alleged;
- k. Where an item was struck, identify the item;
- l. Number of alleged injuries, if any; and
- m. Number of alleged fatalities, if any.

Provide this information in Microsoft Access 2003, or a compatible format, entitled "EA04- 025 FORD PICKUPS REQUEST NUMBER TWO DATA." See Enclosure I, EA04-025 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 information sought in Request 3 is available for owner and field reports, it is provided in the database. There are no responsive lawsuits or claims.

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 responsive reports in the database contained in Appendix C on the enclosed CD in response to Request 2.

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 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 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 "EA04-025 FORD PICKUPS WARRANTY DATA." See Enclosure I, EA04-025 Data Collection Disc, for a pre-formatted table that provides further details regarding this submission.

Answer

Records identified in a search of the AWS database, as described in Appendix B, were reviewed for relevance and categorized in accordance with the categories described in the response to Request 2. The number of relevant warranty claims identified in this search and review is provided in Appendix C (filename: 2005-02-22 Appendix C) on the enclosed CD. Copies of these categorized warranty claims are provided in the AWS portion of the electronic database also 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 was marked accordingly and the group 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. Warranty claims that are duplicative of owner or field reports are provided in Appendix C but are not included in the report count.

Requests for "goodwill, field, or zone adjustments" received by Ford to date that relate to allegations of inadvertent movement of subject peer vehicles while parked that were not honored, if any, would be indicated in the MO' reports identified above in response to Request 2. Requests for goodwill that were honored, if any, are contained in the warranty data provided.

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 in Microsoft Access 2003, 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

Detailed descriptions of the search criteria, including all pertinent parameters, used to identify the claims provided in response to Request 5 are described in Appendix B.

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, 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 office, or field offices pertaining, at least in part, to inadvertent movement of subject peer vehicles while parked, 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 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 has identified no SSMs and no TSBs that may relate to allegations of inadvertent movement in subject peer vehicles while parked.

Internal Service Messages: Ford has identified no ISMs that may relate to allegations of inadvertent movement in subject peer vehicles while parked.

Field Review Committee: Ford has identified no field service action communications that may relate to allegations of inadvertent movement in subject peer vehicles while parked.

Request 8

Identify, describe, and provide copies of all engineering standards, design guidelines, and specifications that relate in any way to the potential for the vehicle operator to achieve a shift position between Reverse and Park in the gear selector assemblies of the automatic transmissions used in the subject peer vehicles. This should include a short description and photograph of the contour of the "rooster comb" manual detent lever in these transmissions.

Answer

Copies of the requested engineering standards, design guidelines and specifications will be submitted under separate cover with a request for confidentiality to the agency's Office of Chief Counsel as Appendices F1 – F3.

In the 2003 and 2004 model years, the available Ford F-250 and F-350 Super Duty automatic transmissions were a 5R110 or a 4R100. A short description and photographs of the inner manual lever ("rooster comb") for the two transmissions are being provided as Appendix G (filename: 2005-02-22 Appendix G).

Request 9

Supply a photograph of each different shifter and PRNDL indicator arrangement used in the subject vehicles.

Answer

The subject peer vehicles utilize a column-mounted shift lever and a PRNDL indicator that is incorporated in the instrument cluster for both available transmissions. The system is the same for all subject peer vehicles with only a minor difference existing between the 4R100 transmission PRNDL (6-positions) and the 5R110 transmission PRNDL (7-positions). Photographs of the instrument cluster showing the 7-position PRNDL are being provided electronically in Appendix H (filename: 2005-02-22 Appendix H) on the enclosed CD.

Request 10

Provide a Park-Reverse and a Reverse-Park shift sequence chart identifying the status of significant components within the subject vehicles' transmission shift systems based on either manual shaft rotational displacement (steering column-mounted shifters) or shift handle linear displacement (console or floor-mounted shifters). The chart should identify the status of the PRNDL readout, engagement/disengagement of the Park and Reverse gates, park pawl position, and the energizing/de-energizing of any related hydraulic circuits. Representative diagrams are found in Enclosure 1.

Answer

A shift sequence chart was developed for the 5R110 transmission only—no such chart exists for the now out-of-production 4R100 transmission. Furthermore, it is Ford's engineering practice to model shift sequence charts on the rotation of the outboard manual lever located on the outside of the transmission housing, not on the "manual shaft rotational displacement" of the steering column shifter.

In a January 25, 2005, telephone conversation, Mr. Greg Magno of the agency informed Ford personnel that the existing 5R110 transmission chart in its current form is a sufficient response to this request at this time. This shift sequence chart will be submitted under separate cover with a request for confidentiality to the agency's Office of Chief Counsel as Appendix I-1. A brief explanation of the chart is provided in electronic form as Appendix I-2 (filename: 2005-02-22 Appendix I-2) on the enclosed CD.

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