



U.S. Department
of Transportation
**National Highway
Traffic Safety
Administration**

JUN 22 2005

400 Seventh Street, S.W.
Washington, D.C. 20590

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

James Vondale, Director
Automotive Safety Office, Environmental and Safety Compliance
Ford Motor Company
Fairlane Plaza South
330 Town Center Drive, Suite 400
Dearborn, MI 48126

NVS-214bby
EA05-005

Dear Mr. Vondale:

As you are aware, the Office of Defects Investigation (ODI) of the National Highway Traffic Safety Administration (NHTSA) has upgraded its investigation of under hood fires resulting from a short circuit in the Speed Control Deactivation Switch (SCDS) in model year (MY) 1995 through 2002 Ford F150, Ford Expedition, and Lincoln Navigator vehicles (excluding vehicles included in Recall 05V-017) manufactured by Ford Motor Company. This letter is to request additional information to assist us in our investigation.

This office has received 319 reports alleging engine compartment fires in MY 1995 through 2002 Ford F150, Ford Expedition, and Lincoln Navigator vehicles (excluding vehicles included in Recall 05V-017) while parked with the ignition in the off position. Two hundred and seventy six of the complaints were received in the last 12 months. A copy of each of the reports will be furnished under separate cover.

Unless otherwise stated in the text, the following definitions apply to these information requests:

- **Subject vehicles:** All MY 1995 through 2002 Ford F150, Ford Expedition, and Lincoln Navigator vehicles. (excluding vehicles included in Recall 05V-017)
- **Subject components:** All Speed Control Deactivation Switches produced for use in the subject vehicles as original equipment or as replacement parts.
- **Peer vehicles:** All 1995 through 1996 MY Ford Bronco, 1998 through 2001 MY Ford Explorer (w/o Interactive Vehicle Dynamics), 1998 through 2002 MY Ford Ranger and 1995 through 2002 MY Ford Econoline Vehicles.
- **Subject recall:** NHTSA Recall No. 05V-017



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- **Ford:** Ford Motor Company, all of its past and present officers and employees, whether assigned to its principal offices or any of its field or other locations, including all of its divisions, subsidiaries (whether or not incorporated) and affiliated enterprises and all of their headquarters, regional, zone and other offices and their employees, and all agents, contractors, consultants, attorneys and law firms and other persons engaged directly or indirectly (e.g., employee of a consultant) by or under the control of Ford (including all business units and persons previously referred to), who are or, in or after 1991, were involved in any way with any of the following related to the alleged defect in the subject vehicles:
 - a. Design, engineering, analysis, modification or production (e.g. quality control);
 - b. Testing, assessment or evaluation;
 - c. Consideration, or recognition of potential or actual defects, reporting, record-keeping and information management, (e.g., complaints, field reports, warranty information, part sales), analysis, claims, or lawsuits; or
 - d. Communication to, from or intended for zone representatives, fleets, dealers, or other field locations, including but not limited to people who have the capacity to obtain information from dealers.
- **Alleged defect:** Any malfunction of the speed control deactivation switch resulting in melting of switch materials, smoke, fire, or ignition of engine compartment materials or components.
- **Document:** "Document(s)" is used in the broadest sense of the word and shall mean all original written, printed, typed, recorded, or graphic matter whatsoever, however produced or reproduced, of every kind, nature, and description, and all non-identical copies of both sides thereof, including, but not limited to, papers, letters, memoranda, correspondence, communications, electronic mail (e-mail) messages (existing in hard copy and/or in electronic storage), faxes, mailgrams, telegrams, cables, telex messages, notes, annotations, working papers, drafts, minutes, records, audio and video recordings, data, databases, other information bases, summaries, charts, tables, graphics, other visual displays, photographs, statements, interviews, opinions, reports, newspaper articles, studies, analyses, evaluations, interpretations, contracts, agreements, jottings, agendas, bulletins, notices, announcements, instructions, blueprints, drawings, as-builts, changes, manuals, publications, work schedules, journals, statistical data, desk, portable and computer calendars, appointment books, diaries, travel reports, lists, tabulations, computer printouts, data processing program libraries, data processing inputs and outputs, microfilms, microfiches, statements for services, resolutions, financial statements, governmental records, business records, personnel records, work orders, pleadings, discovery in any form, affidavits, motions, responses to discovery, all transcripts, administrative filings and all mechanical, magnetic, photographic and electronic records or recordings of any kind, including any storage media associated with computers, including, but not limited to, information on hard drives, floppy disks, backup tapes, and zip drives, electronic communications, including but not limited to, the Internet and shall include any drafts or revisions pertaining to any of the foregoing, all other things similar

to any of the foregoing, however denominated by Ford, any other data compilations from which information can be obtained, translated if necessary, into a usable form and any other documents. For purposes of this request, any document, which contains any note, comment, addition, deletion, insertion, annotation, or otherwise comprises a non-identical copy of another document shall be treated as a separate document subject to production. In all cases where original and any non-identical copies are not available, "document(s)" also means any identical copies of the original and all non-identical copies thereof. Any document, record, graph, chart, film or photograph originally produced in color must be provided in color. Furnish all documents whether verified by the manufacturer or not. If a document is not in the English language, provide both the original document and an English translation of the document.

- **Other terms:** To the extent that they are used in these information requests, the terms "claim," "consumer complaint," "dealer field report," "field report," "fire," "fleet," "good will," "make," "model," "model year," "notice," "property damage," "property damage claim," "rollover," "type," "warranty," "warranty adjustment," and "warranty claim," whether used in singular or in plural form, have the same meaning as found in 49 CFR 579.4.

In order for my staff to evaluate the alleged defect, certain information is required. Pursuant to 49 U.S.C. § 30166, please provide numbered responses to the following information requests. Insofar as Ford has previously provided a document to ODI, Ford may produce it again or identify the document, the document submission to ODI in which it was included and the precise location in that submission where the document is located. When documents are produced, the documents shall be produced in an identified, organized manner that corresponds with the organization of this information request letter (including all individual requests and subparts). When documents are produced and the documents would not, standing alone, be self-explanatory, the production of documents shall be supplemented and accompanied by explanation.

Please repeat the applicable request verbatim above each response. After Ford's response to each request, identify the source of the information and indicate the last date the information was gathered. If requested information is unavailable, so state and provide a brief explanation. Along with your written response, please provide this information in Microsoft Word 2000, or a compatible format, entitled "IR Response."

1. State, by model and model year, the number of subject and peer vehicles Ford has manufactured for sale or lease in the United States. Separately, for each subject vehicle manufactured to date, state the following:
 - a. Vehicle identification number (VIN);
 - b. Make;
 - c. Model;
 - d. Model Year;
 - e. Date of manufacture;
 - f. Date warranty coverage commenced;

- g. The plant where the vehicle was produced;
- h. If Antilock Brakes were installed as original equipment;
- i. If Traction Control was installed as original equipment;
- j. If Cruise Control was installed as original equipment; and,
- k. The State in the United States where the vehicle was originally sold or leased (or delivered for sale or lease).

Provide the table in Microsoft Access 2000, or a compatible format, entitled "PRODUCTION DATA." See Enclosure 1, Data Collection Disc, for a pre-formatted table designed for this submission.

2. State the number of each of the following, received by Ford, or of which Ford is otherwise aware, which relate to engine compartment fires in the subject and peer 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. Third-party arbitration proceedings where Ford is or was a party to the arbitration; and,
 - e. 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 for each model and model year. 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.

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. Incident state;
 - i. Report or claim date;
 - j. Whether a crash is alleged;
 - k. Whether a fire is alleged;
 - l. Whether property damage is alleged;
 - m. Number of alleged injuries, if any;
 - n. Number of alleged fatalities, if any;
 - o. Ford component and system codes;
 - p. Whether the item is related to the alleged defect;
 - q. The alleged quadrant of the engine compartment where the fire started. (front left, front right, rear left, rear right, unknown)
 - r. Whether the incident occurred with the engine "OFF" or the engine "ON";
 - s. Whether or not Ford received a subrogation claim regarding the incident (Y/N);
 - t. Whether a fire investigation was performed by any party that Ford is aware of, to determine the origin and cause (if so, please provide a copy of the report);
 - u. Alleged cause of the fire;
 - v. Complaint summary;
 - w. Consumer comments; and,
 - x. Ford's assessment of the allegation.
4. Provide this information in Microsoft Access 2000, or a compatible format, entitled "REQUEST NUMBER TWO DATA." See Enclosure 1, Data Collection Disc, for a pre-formatted table designed for this submission.
 5. Produce electronic copies of all documents related to each item within the scope of Request No. 2. Include color copies of any photographs and any fire investigation reports that Ford has in its possession related to each of the response items. Organize the documents separately by category (i.e., consumer complaints, field reports, etc.) and describe the method Ford used for organizing the documents.
 6. 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 where the subject component was replaced in the subject and peer 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. Causal part (if identified);
- j. Whether smoke, melting or fire is identified (if fields exist in warranty data);
- k. Replacement part number(s) and description(s);
- l. Concern stated by customer; and
- m. Comments, by dealer/technician relating to claim and/or repair.

Provide this information in Microsoft Access 2000, or a compatible format, entitled "WARRANTY DATA." See Enclosure 1, Data Collection Disc, for a pre-formatted table designed for this submission.

7. Describe in detail the search criteria used by Ford to identify the claims identified in response to Request No. 6, 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) related to the alleged defect 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.
8. Produce electronic copies of all service, warranty, and other documents that relate to, or may relate to, the alleged defect in the subject and peer 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.
9. By model and model year describe the circuit that contains the SCDS in the subject and peer vehicles. Include in this description the other components that are powered on this circuit. Also include a description of the power, fusing, relays, or other current limiting devices that are in the circuit with the SCDS.
10. 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 on any of the subject components installed in the subject or peer vehicles or vehicles included in the subject recall 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 electronic 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.

11. By model and model year identify and describe all significant modifications or changes made by or on behalf of Ford in the manufacture, design, or material composition of the SCDS, the electrical circuit containing the SCDS, the Electrical Connector to the SCDS, and the seal used between the SCDS and the Electrical Connector used in subject and peer vehicles. The following information must be included for each such modification or change:
 - a. The orientation of the SCDS on the master cylinder;
 - b. The make and model year of the vehicle that the design applies to;
 - c. The date, or approximate date on which the modification or change was incorporated into production;
 - d. A description of the modification or change;
 - e. The reason for the modification or change;
 - f. The part number of the modified part;
 - g. Whether the original unmodified component was withdrawn from sale, and if so, when; and;
 - h. Whether the modified or changed components can be interchanged with earlier production components.

12. By model and model year, identify and describe all significant modifications or changes made by or on behalf of Ford in the manufacture, design, or material composition of the brake fluid used as original equipment in the MY 1998-2002 Ford Ranger and all subject vehicles. The following information must be included for each such modification or change:
 - a. The make and model year of the vehicle that the design applies to;
 - b. The date, or approximate date on which the modification or change was incorporated into production;
 - c. A description of the modification or change;
 - d. The manufacturer of the brake fluid;
 - e. The reason for the modification or change;
 - f. The part number of the modified part;
 - g. Whether the original unmodified component was withdrawn from sale, and if so, when; and;
 - h. Whether the modified or changed components can be interchanged with earlier production components.

13. By model and model year identify the brake master cylinder by part number and manufacture installed as original equipment on the subject and peer vehicles. Provide the name, address, and appropriate point of contact (name, title, and telephone number) for each of the brake

master cylinder manufacturers identified.

14. Describe the installation process and any tests that are performed by the tier one master brake cylinder manufacturers identified in request number 13 during or after the mating of the SCDS to the master brake cylinder. Provide any requirements or specifications that define this process or testing.
15. By model and model year identify and describe all significant modifications or changes made by or on behalf of Ford in the manufacture, design, or material composition of the master brake cylinder used in Ford Ranger and subject vehicles. The following information must be included for each such modification or change:
 - a. The make and model year of the vehicle that the design applies to;
 - b. The manufacturer of the master brake cylinder;
 - c. The date, or approximate date on which the modification or change was incorporated into production;
 - d. A description of the modification or change;
 - e. The reason for the modification or change;
 - f. The part number of the modified part;
 - g. Whether the original unmodified component was withdrawn from sale, and if so, when; and;
 - h. Whether the modified or changed components can be interchanged with earlier production components.
16. By model and model year identify the brake line tubing by part number and manufacturer installed as original equipment on the subject and peer vehicles. Provide the name, address, and appropriate point of contact (name, title, and telephone number) for each of the brake line tubing manufacturers identified.
17. Provide any requirements or specifications that define the brake line tubing used as original equipment on the subject and peer vehicles.
18. By model and model year identify and describe all significant modifications or changes made by or on behalf of Ford in the manufacture, design, or material composition of the brake line tube used as original equipment in the MY 1998-2002 Ford Ranger and the subject vehicles. The following information must be included for each such modification or change:
 - a. The make and model year of the vehicle that the design applies to;
 - b. The date, or approximate date on which the modification or change was incorporated into production;
 - c. A description of the modification or change;
 - d. The manufacturer of the brake tube lining;
 - e. The reason for the modification or change;
 - f. The part number of the modified part;
 - g. Whether the original unmodified component was withdrawn from sale, and if so, when;

and peer vehicles. Provide the name, address, and appropriate point of contact (name, title, and telephone number) for each of the cruise control servo manufacturers identified.

23. By model and model year identify and describe all significant modifications or changes made by or on behalf of Ford in the manufacture, design, or material composition of the Anti-Lock Brake Control Module or Hydraulic Control Unit used in peer Ford Ranger and subject vehicles. The following information must be included for each such modification or change:
- The make and model year of the vehicle that the design applies to;
 - The date, or approximate date on which the modification or change was incorporated into production;
 - A description of the modification or change;
 - Manufacturer of unit;
 - The reason for the modification or change;
 - The part number of the modified part;
 - Whether the original unmodified component was withdrawn from sale, and if so, when; and;
 - Whether the modified or changed components can be interchanged with earlier production components.
24. By model and model year provide the curb weight and gross vehicle weight for the subject and peer vehicles at the time of manufacture.
25. State the number of each of the following that Ford has sold that may be used in subject and peer vehicles by tier one supplier or location delivered to, component name, part number (both service and engineering/production), model and model year of the vehicle in which it was used; and month/year of sale (*including the cut-off date for sales, if applicable*):
- Speed Control Deactivation Switches; and
 - Any kits that have been released, or developed, by Ford for use in service repairs to the subject component/assembly.

For each component part number, provide the 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 same part number component, whether installed in production or in service, and state the applicable dates of production or service usage.

Provide this information in Microsoft Access 2000, or a compatible format, entitled "REQUEST NUMBER TWENTY FIVE." See Enclosure 1, Data Collection Disc, for a pre-formatted table designed for this submission.

26. By model and model year provide the peak operating and hot soak temperatures in the area of the subject component on the subject and peer Ford Ranger vehicles.

27. State whether Ford has ever conducted, or is aware of, any returned part analyses of subject vehicles or vehicles included in the subject recall related to the alleged defect. If so, describe, and provide electronic copies of all documents relating to, any and all returned part analyses of subject components. Include in your description the total number of such parts returned, the number analyzed, a description of how they were analyzed. Include any and all material showing the frequencies of failed components as a function of service life or mileage.
28. Furnish Ford's assessment of the alleged defect in the subject vehicles, including:
- a. All causal or contributory factors;
 - b. All warning symptoms;
 - c. The failure mode;
 - d. The root cause of the failures;
 - e. Its potential effect on occupant safety;
 - f. The potential for future occurrences of the alleged defect in the subject vehicles;
 - g. The relative contribution of Kapton diaphragm failures to the total number of subject component failures, including how this changes over the service life of the parts (e.g., state whether it is considered a greater contributor later in life than it is early in life);
 - h. The risk of under hood fire in each of the subject models as a function of time in comparison to other medium to large-sized passenger cars at similar ages; and,
 - i. The relative contribution of the subject component to the incidence of under hood fires in the subject models over the service life of the vehicle and state the bases for the assessment.

This letter is being sent to Ford pursuant to 49 U.S.C. § 30166, which authorizes NHTSA to conduct any investigation that may be necessary to enforce Chapter 301 of Title 49 and to request reports and the production of things. It constitutes a new request for information. Ford's failure to respond promptly and fully to this letter could subject Ford to civil penalties pursuant to 49 U.S.C. § 30165 or lead to an action for injunctive relief pursuant to 49 U.S.C. § 30163. (Other remedies and sanctions are available as well.) Please note that maximum civil penalties under 49 U.S.C. § 30165 have increased as a result of the recent enactment of the Transportation Recall Enhancement, Accountability, and Documentation (TREAD) Act, Public Law No. 106-414 (signed November 1, 2000). Section 5(a) of the TREAD Act, codified at 49 U.S.C. § 30165(b), provides for civil penalties of up to \$5,000 per day, with a maximum of \$15 million for a related series of violations, for failing or refusing to perform an act required under 49 U.S.C. § 30166. This includes failing to respond to ODI information requests.

If Ford cannot respond to any specific request or subpart(s) thereof, please state the reason why it is unable to do so. If on the basis of attorney-client, attorney work product, or other privilege, Ford does not submit one or more requested documents or items of information in response to this information request, Ford must provide a privilege log identifying each document or item withheld, and stating the date, subject or title, the name and position of the person(s) from, and the person(s) to whom it was sent, and the name and position of any other recipient (to include all carbon copies or blind carbon copies), the nature of that information or material, and the basis for the claim of privilege and why that privilege applies.

Ford's response to this letter, in duplicate, together with a copy of any confidentiality request, must be submitted to this office by August 16, 2005. Please refer to EA-05-005 in Ford's response to this letter. If Ford finds that it is unable to provide all of the information requested within the time allotted, Ford must request an extension from Mr. Richard Boyd at (202) 366-4933 no later than five business days before the response due date. If Ford is unable to provide all of the information requested by the original deadline, it must submit a partial response by the original deadline with whatever information Ford then has available, even if an extension has been granted.

If Ford claims that any of the information or documents provided in response to this information request constitute confidential commercial material within the meaning of 5 U.S.C. § 552(b)(4), or are protected from disclosure pursuant to 18 U.S.C. § 1905, Ford must submit supporting information together with the materials that are the subject of the confidentiality request, in accordance with 49 CFR Part 512, to the Office of Chief Counsel (NCC-113), National Highway Traffic Safety Administration, Room 5219, 400 Seventh Street, S.W., Washington, D.C. 20590. Ford is required to submit two copies of the documents containing allegedly confidential information (except only one copy of blueprints) and one copy of the documents from which information claimed to be confidential has been deleted.

If you have any technical questions concerning this matter, please call Bruce York of my staff at (202) 366-6938.

Sincerely,



Kathleen C. DeMeter, Director
Office of Defects Investigation
Enforcement

Enclosure 1, one CD ROM titled Data Collection Disc containing three files
Enclosure 2, Three hundred and nineteen consumer complaints