



OFFICE OF DEFECTS &
INVESTIGATIONS

2011 DEC -6 P 3:31

Steve M. Kenner, Global Director
Automotive Safety Office
Sustainability, Environment & Safety Engineering

Fairlane Plaza South, Suite 400
330 Town Center Drive
Dearborn, MI 48126-2738 USA

December 2, 2011

Mr. Frank S. Borris, Director
Office of Defects Investigation
National Highway Traffic Safety Administration
1200 New Jersey Avenue SE, Room W45-302
Washington, DC 20590

Dear Mr. Borris:

Subject: EA09-013:NVS-213dlr

In a November 9, 2011 meeting with Ford and Office of Defects Investigation (ODI) personnel, Jeffery Quandt, of the agency, requested an update of owner reports, field reports, warranty claims, and lawsuit and claim reports received by Ford since April 5, 2011, the date of its most recent information request for EA09-013. Ford is providing the requested information dated up to and including November 9, 2011, the date of the request, in Appendix C.

Ford's review of information pertaining to this subject continues to be consistent with Ford's previous analyses that have been provided to the agency, including our most recent response on May 19, 2011. The complaint rate remains low, and very few additional reports relating to this subject have been received by Ford or the agency on a vehicle population that exceeds 1.49 million vehicles, half of which have been in service for over eight years.

Since April 5, 2011, the date of the agency's previous information request for EA09-013, Ford has received only six allegations of unintended vehicle movement while in Park on these vehicles. At least three of these reports clearly do not involve the brake shift interlock (BSI) solenoid:

- One report [MORS Case #:1457611688] alleges unintended vehicle movement when the vehicle was in Park and the ignition key was removed. Per the requirements prescribed by FMVSS 114, the ignition key cannot be removed unless the transmission or gear shift lever is locked in the Park position.
- Another report [AWS Claim Key: 1699683] alleges that the vehicle would roll down when parked on a slight incline. The repairing technician stated that numerous internal transmission components were damaged and needed to be replaced, including the planetary carrier, shell sun gear, servo case, and servo piston.
- One field report pertains to an allegation that the vehicle moved when it was parked on a hill [CQIS Report #: BGTC7016]. The repairing technician indicated that the



customer was driving the All-Wheel Drive (AWD) vehicle without the front driveshaft installed in the vehicle. If a customer drives an AWD vehicle without the front driveshaft installed, the transfer case could fail, which may result in a vehicle being able to roll in Park.

In addition to the reports received by Ford, our search of the VOQ database found three reports submitted to the agency in 2011 that alleged unintended vehicle movement. Ford has no corresponding reports and, of these three reports, two apparently do not involve the BSI solenoid, and the other is ambiguous as to whether it report pertains to the BSI.

- ODI#: 10432531, the customer alleges 'the gearshift was able to be moved from park to reverse and drive without the keys in the ignition...' As previously stated, the system is designed so that the ignition key cannot be removed unless the transmission or gear shift lever is locked in the Park position.
- ODI #: 10432694, the customer states "...hard to get vehicle into park on the gear shifter. Have thought the vehicle was in park only to have it roll when I take my foot off the brake. Took vehicle to mechanic today who says a new transmission is needed. Appx. cost 3600."

Consistent with the analysis provided in Ford's May 19, 2011 response to EA09-013, the data have consistently supported that the vast majority of reports received by Ford (approximately 98%) concern increased shift efforts while attempting to shift into Park, contrasted with only a small number of allegations (approximately 2%) that report unintended vehicle movement after attempting to shift into Park. For the 2011 calendar year, only one allegation of unintended movement while in Park received by Ford was specifically attributed to the BSI solenoid; three other allegations of unintended movement received by Ford were ambiguous to the cause, and three others appeared to relate to some other condition. There continues to be a very low number of incremental reports on 1.49 million 2002 through 2005 model year Explorer and Mountaineer vehicles, and it is unclear whether several of these even relate to the BSI or instead relate to a variety of other conditions that may exist on these or any vehicles that have been in service for between 6 and 10 years. Some reports may even simply relate to driver mis-shifts, yet be attributed to this condition simply because there is an open investigation.

Ford agrees with the agency that drivers who do not follow basic, common sense vehicle driving practices that are consistent with safe vehicle operation may experience unintended vehicle movement while in Park. These practices include: ignoring any progressive changes to the shift system behavior or feel, ignoring the fact that the shift indicator is not in the Park position, ignoring the fact that the key could not be removed from the ignition switch, and/or ignoring the Owner's Guide instructions and the agency's recommendations to always apply the parking brake before exiting the vehicle. Ford believes that consideration of all the factors relating to this subject continue to support a conclusion that this condition does not present an unreasonable safety risk in these vehicles.

Appendix Requests

In a November 28, 2011 e-mail, Derek Reinhart, of the agency, informed Ford that engine and transmission codes were not provided in Appendix A of Ford's May 19, 2011 response. Ford is providing the requested production volume data containing the mistakenly omitted information in Appendix A.

Mr. Frank S. Borris

- 3 -

December 2, 2011

Additionally, Mr. Reinhart informed Ford that Appendix J (Non-Confidential Documents) was not provided in its May 19, 2011 response. Ford is providing the original appendix that was inadvertently not provided in its May 19, 2011 response.

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

Sincerely,



Steven M. Kenner

Attachment