



OFFICE OF DEFECTS &
INVESTIGATIONS
2014 NOV 10 P 3: 11 ER

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November 7, 2014

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: PE14-028:NVS-212eer

The Ford Motor Company (Ford) response to the agency's September 23, 2014 letter concerning reports of doors not latching when closed or of doors opening after closing in 2011 through 2013 model year Ford Fiesta vehicles is attached.

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

Sincerely,


for Steven M. Kenner

Attachment

FORD MOTOR COMPANY (FORD) RESPONSE TO PE14-028

Ford's response to this Preliminary Evaluation 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 Preliminary Evaluation.

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. 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.

Ford notes that some of the information being produced pursuant to this inquiry may contain personal information such as customer names, addresses, telephone numbers, and complete Vehicle Identification Numbers (VINs). Ford is producing such personal information in an unredacted form to facilitate the agency's investigation with the understanding that the agency will not make such personal information available to the public under FOIA Exemption 6, 5 U.S.C. 552(b)(6).

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 September 23, 2014, the date of your inquiry. Ford has searched within the following offices for responsive documents: Ford Customer Service Division, Marketing and Sales Operations, Quality, Global Core Engineering, Office of the General Counsel, and North American 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. Make;
- c. Model;
- d. Model Year;
- e. Date of manufacture;

- f. Date warranty coverage commenced.; and
- g. 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 2010, or a compatible format, entitled "PRODUCTION DATA."

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) protectorates, and territories (American Samoa, Guam, Northern Mariana Islands, Puerto Rico, and Virgin Islands) is 202,475.

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

Model	2011 MY	2012 MY	2013 MY	Total
Ford Fiesta	76,698	59,323	66,454	202,475

The requested data for the subject vehicles is provided in Appendix A.

Request 2

State the number of each of the following, received by Ford, or of which Ford are 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;
- 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 "f," 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 "f," 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 that may be related to the alleged defect and any related documents, Ford has gathered "owner reports" and "field reports" maintained by

Ford Customer Service Division (FCSD), and claim and lawsuit information maintained by Ford's Office of the General Counsel (OGC).

Descriptions of the FCSD owner and field report systems and the criteria used to search each of these are provided in Appendix B.

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

Category	Allegation
A01	Left Front (LF) door did not latch or inadvertently opened after being closed
A02	Right Front (RF) door did not latch or inadvertently opened after being closed
A03	Left Rear (LR) door did not latch or inadvertently opened after being closed
A04	Right Rear (RR) door did not latch or inadvertently opened after being closed
A05	LF & RF doors did not latch or inadvertently opened after being closed
A06	LF & LR doors did not latch or inadvertently opened after being closed
A07	LF & RR doors did not latch or inadvertently opened after being closed
A08	RF & LR doors did not latch or inadvertently opened after being closed
A09	RF & RR doors did not latch or inadvertently opened after being closed
A10	LR & RR doors did not latch or inadvertently opened after being closed
A11	LF & RF & LR doors did not latch or inadvertently opened after being closed
A12	LF & RF & RR doors did not latch or inadvertently opened after being closed
A13	LF & LR & RR doors did not latch or inadvertently opened after being closed
A14	RF & LR & RR doors did not latch or inadvertently opened after being closed
A15	All doors did not latch or inadvertently opened after being closed
A16	Unknown Front door did not latch or inadvertently opened after being closed
A17	Unknown Rear door did not latch or inadvertently opened after being closed
A18	Unknown Left door did not latch or inadvertently opened after being closed
A19	Unknown Right door did not latch or inadvertently opened after being closed
A20	Unknown Door did not latch or inadvertently opened after being closed
B	Ambiguous allegation

We are providing electronic copies of reports categorized as "B" 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.

In order to respond to the last three subparts of Requests 3 and 5, "A" categories noted above are supplemented with a three digit suffix using the following definition:

Position One: Whether the vehicle was in motion at the time of the incident

1=Yes, 2=No, 3=Unknown

Position Two: Was the vehicle driven with the door held closed by an occupant or object

1=Yes, 2=No, 3=Unknown

Position Three: If the repair of the door was delayed due to a part availability issue

1=Yes, 2=No, 3=Unknown

Owner Reports: Records identified in a search of the FMC360 database were reviewed for relevance and sorted in accordance with the categories described above. The number and copies of relevant owner reports identified in this search that allege a door did not latch or inadvertently opened after being closed in a subject vehicle are provided in the FMC360

portion of the 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 owner reports for an alleged incident were received, each of these duplicate reports 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 report associated with their VINs. These reports have been counted separately.

Legal Contacts: To the extent that responsive (i.e., not ambiguous) owner reports indicate that they are Legal Contacts, Ford searched for related files from the OGC. Ford identified no responsive reports.

Field Reports: Records identified in a search of the Common Quality Indicator System (CQIS) database were reviewed for relevance and sorted in accordance with the categories described above. The number and copies of relevant field reports identified in this search that allege a door did not latch or inadvertently opened after being closed in a subject vehicle are provided in the CQIS portion of the database contained in Appendix C. The categorization of each report is identified in the "Category" field.

When we were able to identify that responsive duplicate field reports for an alleged incident were received, each of these duplicate reports 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 report associated with their VINs. These reports have been counted separately. In addition, field reports that are duplicative of owner reports are provided in Appendix C but are not included in the field report count.

VOQ Data: This information request had an attachment that included 82 Vehicle Owner Questionnaires (VOQs), one of which was duplicative. Ford made inquiries of its FMC360 database for customer contacts, and its CQIS database for field reports regarding the vehicles identified 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. One of the VOQs provided with the information request (10628735) alleged the passenger was "in pain for about a couple weeks or so" after walking into the passenger door that did not latch when closed. The owner did not contact Ford regarding this incident.

Crash/Injury Incident Claims: For purposes of identifying allegations of accidents or injuries that may have resulted from the alleged defect, Ford has reviewed responsive owner and field reports, and lawsuits and claims. Ford identified no injury allegations. A claim alleging an unlatched door contacted the adjacent vehicle while the driver was pulling into a parking space was identified. A copy of the claim corresponding to this alleged incident is provided in Appendix D.

Claims, Lawsuits, and Arbitrations: For purposes of identifying incidents that may relate to the alleged defect in a subject vehicle, 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.

Lawsuits and claims gathered in this manner were reviewed for relevance and sorted in accordance with the categories described above.

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. The number of relevant lawsuits and claims identified is also provided in this log. To the extent available, copies of complaints, first notices, or FMC360 reports relating to matters shown on the log are provided in Appendix D. With regard to these lawsuits and claims, Ford has not undertaken to contact outside law firms to obtain additional documentation.

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. Number of alleged injuries, if any;
- l. Number of alleged fatalities, if any;
- m. Which door(s) was/were affected;
- n. Whether the vehicle was in motion at the time of the incident
 - i) If so, whether anything came out of the vehicle when it opened;
- o. Whether the consumer drove the vehicle with the door in an unlatched condition either by having another occupant hold it closed or by using an object to hold it closed, and
- p. If the repair of the door was delayed due to a part availability issue

Provide this information in Microsoft Access 2010, or a compatible format, entitled "REQUEST NUMBER TWO DATA."

Answer

Ford is providing owner and field reports in the database contained in Appendix C 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. To the extent information sought in Request 3 is available for lawsuits and claims, it is provided in the Log of Lawsuits and Claims as Appendix E.

With regards to Request 3.n.i, Ford notes that no reports stated an object came out of a vehicle when a door allegedly opened while the vehicle was in motion.

Request 4

Produce electronic copies of all documents related to each item within the scope of Request No. 2. Organize the documents separately by category (i.e., consumer

complaints, field reports, etc.) and describe the method Ford used for organizing the documents. Describe in detail the search methods and search criteria used by Ford to identify the items in response to Request No. 2.

Answer

Ford is providing owner and field reports in the database contained in Appendix C in response to Request 2. Copies of complaints, first notices, or FMC360 reports relating to matters shown on the Log of Lawsuits and Claims (as Appendix E) are provided in Appendix D. To the extent information sought in Request 4 is available, it is provided in the referenced appendices. The search methods and search criteria used by Ford to identify the items in response to Request 2 are described in Appendix B.

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.
- l. Which door(s) was/were affected;
- m. Whether the vehicle was in motion at the time of the incident
 - i) If so, whether anything came out of the vehicle when it opened;
- n. Whether the consumer drove the vehicle with the door in an unlatched condition either by having another occupant hold it closed or by using an object to hold it closed, and
- o. If the repair of the door was delayed due to a part availability issue

Provide this information in Microsoft Access 2010, or a compatible format, entitled "WARRANTY DATA."

Answer

Records identified in a search of the AWS database, as described in Appendix B, were reviewed for relevance and sorted in accordance with the categories described in the response to Request 2. The number and copies of relevant warranty claims identified in this search that allege a door did not latch or inadvertently opened after being closed in a subject vehicle are provided in the AWS portion of the 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 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 and field reports are provided in Appendix C but are not included in the report count above.

Requests for "goodwill, field, or zone adjustments" received by Ford to date that relate to the alleged defect that were not honored, if any, would be included in the FMC360 reports identified above in response to Request 2. Such claims that were honored are included in the warranty data provided.

With regards to Request 5.m.i, Ford notes that no reports stated an object came out of a vehicle when a door allegedly opened while the vehicle was in motion.

Request 6

Describe in detail the search criteria used by Ford to identify the claims identified in response to Request 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

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.

For 2011-2013 model year Ford Fiesta vehicles, the New Vehicle Limited Warranty, Bumper-to-Bumper Coverage begins at the warranty start date and lasts for three years or 36,000 miles, whichever occurs first. Optional Extended Service Plans (ESPs) are available to cover various vehicle systems, time in service, and mileage increments. The details of the various plans are provided in Appendix F. As of the date of the information request, 39,970 new vehicle ESP policies had been purchased on 2011-2013 model year Ford Fiesta vehicles.

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 offices, or field offices pertaining, at least in part, to a door not latching or inadvertently opening after being closed, 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, ISMs, 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 the agency's request.

Internal Service Messages: Ford has identified no ISMs that may relate to the agency's request.

Field Review Committee: Ford has identified no field service action communications that may relate to the agency's request.

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 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 is 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 G.

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

Ford is submitting additional responsive documentation in Appendix H with a request for confidentiality under separate cover to the agency's Office of the Chief Counsel pursuant to 49 CFR Part 512. Redacted copies of the confidential documents will be provided under separate cover, on separate media, to the agency's Office of Chief Counsel as Appendix H – Redacted.

In the interest of ensuring a timely and meaningful submission, Ford is not producing materials or items containing little or no substantive information. Examples of the types of materials not being produced are meeting notices, raw data lists (such as part numbers or VINs) without any analytical content, duplicate copies, non-responsive elements of responsive materials, and draft electronic files for which later versions of the materials are being submitted. Through this method, Ford is seeking to provide the agency with substantive responsive materials in our possession in the timing set forth for our response. We believe our response meets this goal. If the agency would like additional materials, please advise.

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. 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

A table of the requested changes is provided in Appendix I.

Request 10

State the number of each of the following that Ford has sold 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 the sale (including the cut-off date for sales, if applicable):

- a. Subject component; and
- b. 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 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 state 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 dealers. Ford has no means to determine how many of the parts were actually installed on vehicles, the vehicle model or model year on which a particular part was installed, the reason for any given installation, or the purchaser's intended use of the components sold.

Ford is providing the total number of Ford service replacement door latch assemblies by part number (both service and engineering) and year of sale, where available, in Appendix J. Information pertaining to production and service usage for each part number, and supplier point of contact information, is also provided in Appendix J.

Request 11

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; and
- 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 the subject component was malfunctioning; and
- f. The reports included with this inquiry.

Answer

Based on our engineering evaluation, an analysis of returned parts from the field, and a review of the reports of the alleged defect, Ford believes this issue is not an unreasonable risk to motor vehicle safety due to the low rate and multiple and overt warning signs presented to the driver prior to, and during, operation of the vehicle. In addition, allegations of a door opening while driving are inconsistent with this issue.

The cause of the "will not close" concern is a fracture of a tab on the lower housing which holds the fixed leg of the pawl spring. The peak loading on the pawl spring tab occurs during release from the inside or outside handle. All parts returned for the "will not close" concern have been shown to have a broken or cracked lower housing pawl spring tab.

An analysis of reports shows that the report rate is higher in hot and sunny climates, such as found in the Southwestern United States, and more so in vehicles with extremely high internal door temperatures which can be imparted by environment, vehicle color, etc. For example, the latch replacement rate for the darkest painted vehicles is 17 times higher than the lightest painted vehicles. The data also suggests that time in service is not a significant factor.

According to the latch supplier's finite element analysis, the peak stress on the pawl spring tab during release can exceed the material yield strength after accumulating exposure time at temperatures greater than 80 °C (176 °F). Parts heat soak tested at 90 °C (194 °F) for greater than 350 hours exhibited pawl spring tab breakage during latch cycle testing. Latches cycle tested at 80 °C (176 °F) for 84 hours did not exhibit pawl spring tab breakage. Ford continues to test latches heat soaked at various temperatures to understand the relationship between exposure time and temperature on latch performance. However, Ford believes latches in vehicles that are not routinely exposed to temperatures over 80 °C (176 °F) will continue to perform satisfactorily.

If the door does not latch when closed, several warnings are presented to the driver. The most overt warning is that the door rebounds off of the rubber weather strip during the closure attempt and remains proud of the adjacent body surface. Inside the vehicle, the "door ajar" warning will be displayed in the instrument cluster the entire time the door is not closed. Additionally, the interior vehicle lights will remain illuminated the entire time the door is not closed. The door ajar switch that determines if the door is latched is built into the latch assembly and will not signal the door is latched until the latch mechanism has rotated to a point immediately preceding the "primary" latch position. Pushing the door closed by hand until the latch mechanism has rotated to this position will momentarily cause the door ajar switch to close and will turn off the "door ajar" warning in the cluster and turn off the interior lights, however, once the external force is removed from the door, the rubber weather strip will push the door open and open the door ajar switch, which will result in the display of the "door ajar" warning in the instrument cluster and illumination of the interior lights. If the driver operates the vehicle with the door ajar despite these warnings, noise caused by the ajar door would also be easily detectable. In addition to the "door ajar" warnings, the chime associated with FMVSS 114 would also sound if the driver's door was not latched and the key was in the ignition.

The majority of the reports reviewed concern doors that do not latch when closed. However, there are some reports that allege a door inadvertently opened while driving. Ford's data suggests allegations of a door inadvertently opening while driving are inconsistent with this issue for three reasons. First, it is more likely that the door was not latched prior to the incident. As discussed above, all parts returned for the "will not close" concern have been shown to have a broken or cracked lower housing pawl spring tab and that the peak stress on the pawl spring tab occurs when the latch is actuated to open the door (either from the interior or exterior door latch handle). So if a pawl spring tab breaks, it is most likely to break during the time of peak stress. Therefore, if a pawl spring tab breaks when the door is opened, the operator will be unable to latch the door when they attempt to reclose it. Second, some small number of reports indicated the door opened while the vehicle was moving. Ford believes drivers would have to ignore the indicators mentioned above, resulting in the unlatched door

opening further while driving. Third, Ford believes it is highly unlikely that the pawl spring tab could crack or break while the door is latched. Even in such an unlikely event, the pawl-to-catch interface is designed with a "negative angle". This means that, when latched, the force of the catch on the pawl creates a closing moment and, even without the pawl spring in place, the latch does not open on its own. Ford has confirmed the subject latches perform as expected by CAE analysis and by evaluating a vehicle with a door latch that had its pawl spring removed, and confirming that the door remained fully latched.

Summary

The vast majority (91%) of responsive reports provided in this response are warranty claims for latch repair, and the complaint rate for the alleged defect is a low 2.05/1000. Some of the reports noted the repair was delayed due to parts availability. The part supply issue was resolved in October of 2014.

Understandably, a door that does not latch when shut can result in significant customer dissatisfaction, and service part delays contributed to this. However, Ford's engineering evaluation has shown that a latched door experiencing this condition will not inadvertently unlatch, and that there are many overt warnings associated with a door that did not latch due to this condition. The door bounce back, the door not fitting flush to the body, the door ajar warning in the instrument cluster, and the interior vehicle lights staying on are all overt warnings to alert the occupants that a door is not latched, prior to the vehicle being driven. Should the driver choose to operate the vehicle, warnings to the driver, including the door ajar warning in the instrument cluster, the interior lights remaining on, and wind noise generated from the unlatched door, are all present during the drive. Based on latch testing, the analysis of the reports provided in this response, an engineering analysis of latch function, the lack of injury reports to Ford, and the multiple overt warnings in place prior to and during a drive, Ford believes this issue is not an unreasonable risk to motor vehicle safety in the subject vehicles.

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