

Ford Motor Company

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

November 19, 2003

Mr. Kenneth N. Weinstein
Associate Administrator for Enforcement
National Highway Traffic Safety Administration
400 Seventh Street, S.W.
Washington, DC 20590

Dear Mr. Weinstein:

Subject: 2000-2001 Ford Focus FDM Replacement Program 03N01

As the agency is aware, Ford Motor Company (Ford) has decided to conduct a replacement program for the fuel delivery module (FDM) in 2000 and certain 2001 model year Ford Focus vehicles. This program includes approximately 671,000 vehicles manufactured from Job #1, 2000 through June 13, 2001 at Ford's Wayne and Hermosillo Assembly Plants. Because the condition leading to the program is related to fuel quality, it is unknown how many of the vehicles may ultimately be affected.

Ford's investigation has determined that some of these vehicles may experience engine hesitation, loss of power, surging, and other similar driveability symptoms as a result of contamination of the FDM filters. Because the contamination of the filters is progressive, they may over time become sufficiently blocked to cause the engine to stall. Through customer interviews, vehicle evaluations and laboratory analysis, Ford has confirmed the progressive nature of the condition, which begins with the noted driveability symptoms. Ford also learned that, because of these overt symptoms, drivers are aware of the condition and recognize that keeping the fuel tank at a higher level of fuel or reducing the throttle opening will minimize the driveability symptoms.

Ford has concluded that this condition does not present an unreasonable risk to motor vehicle safety. In reaching its conclusion, Ford was mindful of the mid-1980s stalling study conducted by the agency and The Transportation Systems Center, entitled "Analysis of Stalling Problems" (Report No. HE702/S7502). As Ford has previously noted in its responses to the agency on this subject, that study found that although the rate of stalling complaints was comparable to the rate of complaints for other safety defect investigations, the rate of stalling-related accidents was lower than in most investigations that have led to recalls. The agency has used this finding to support its own closures of stalling investigations (EA84-029 and EA84-031) stating, in part, that "[a]lthough there are a large number of complaints of stalling vehicles, the risk of injury or death appears to be low."

Ford's analysis of the instant condition is consistent with the stalling study conclusion. Focus drivers are not at greater risk for stalling related accidents. Ford's investigation shows that the accident rate is extremely low (seven alleged accidents and one alleged minor injury). We believe this is true primarily because of the progressive and overt nature of the condition. Additionally, Ford's investigation and testing show that drivers are able to maintain vehicle control, even in a stall condition, and that power steering and power braking assist are generally maintained.




Prior NHTSA determinations also support a determination here that this condition is not safety-related. Ford's review of NHTSA stalling related determinations leads us to conclude that this condition does not present an unreasonable risk to motor vehicle safety because of the overt and progressive nature of the condition, the ability of the driver to maintain vehicle control, the general ability of the driver to restart the vehicle in the event of a stall condition, and the lack of real world accidents. Accordingly, in order to improve customer satisfaction, Ford is offering to replace the FDM for our customers at no cost if their vehicle exhibits any of the above noted driveability conditions. This offer is valid for a period of 10 years from the original warranty start date of the vehicle, with no limit on the number of miles that the vehicle has been driven.

Ford is conducting this program as a result of our findings during the course of the agency's investigation, beginning with the opening of the Preliminary Evaluation on April 4, 2002 and the agency's upgrade to an Engineering Analysis on September 6, 2002. Ford undertook an extensive investigation, including detailed reviews of reported driveability and stalling complaints, interviews with customers, and vehicle and laboratory analysis. To support this investigation, Ford obtained the FDMs and, in some cases, the complete fuel tank assemblies in a wet condition (gasoline soaked) in order to assure proper evaluation of the condition. This investigation also included real-time analysis of customer vehicles in the environment in which the condition allegedly occurred and subsequent duplication of the reported driveability symptoms at Ford proving grounds. NHTSA personnel observed Ford's analysis of numerous of the parts obtained during this investigation and the affect on vehicle driveability and controllability. Concurrent with this investigation, Ford undertook development of an improved design FDM that could be used in repair of vehicles. This newly designed FDM will be used in this replacement program.

Ford will begin mailing owner letters on approximately November 26, 2003. We do not plan to make a public statement concerning this program although, media personnel and news reporters have contacted Ford concerning this program.

Sincerely,



James P. Vondale