



January 23, 2018

Jim Hackett, President and CEO
Ford Motor Company
PO Box 6248
Dearborn, MI 48126

Dear Mr. Hackett:

The Center for Auto Safety is writing to renew our request the Ford Motor Company undertake a recall of all Model Year 2011-2017 Explorers to address a potentially deadly hazard: Carbon Monoxide leaking into the vehicle's cabin.

According to the Centers for Disease Control, excess exposure to Carbon Monoxide is responsible for more than 400 deaths every year in the United States. Carbon Monoxide poisoning is often referred to as a "silent killer" because, unless mixed with other gases, it is odorless. Additionally, what makes the exposure so dangerous is that the symptoms (loss of consciousness, nausea, headaches, or light headedness) mimic flu-like symptoms therefore delay reaction time in determining the root cause of the injury – elevated levels of Carbon Monoxide in the victim's blood. Further, as the victim is often unaware of the immediate cause of their injury, Carbon Monoxide exposure can be an unsuspected culprit when no expected source is recognizable, leading to underreporting of incidents.

As you know, on July 1, 2016, the National Highway Traffic Safety Administration (NHTSA) opened a Preliminary Evaluation (PE) of Model Year (MY) 2011-2015 Ford Explorers. The PE was focused "on occupants smelling exhaust odors in the occupant compartment, some of which expressed concerns about exposure to carbon monoxide." ([PE 16-008](#)) The PE stated there had been "one low speed crash incident alleged by a complainant, [and] no injuries were reported." At the time of the opening of the PE, there were approximately 639,000 vehicles involved, and NHTSA reported having received 154 complaints.

One year later, on July 27, 2017, NHTSA expanded its inquiry to include an Engineering Analysis ([EA 17-002](#)), and added MY 2016 and 2017 Explorers to the scope of the investigation. The EA indicated that in addition to law enforcement personnel reporting excess exposure to Carbon Monoxide associated with operating Police Interceptor vehicles, civilian complaints had increased. Explorer owners were complaining of loss of consciousness, nausea, headaches, or light headedness. The EA stated NHTSA had received reports of 3 crashes and 39 injuries. At the time of the

opening of the EA, there were approximately 1,333,000 vehicles involved, and NHTSA reported having received 791 complaints, a more than 500 percent increase from the time the PE was opened.

On October 13, 2017, Ford released a “Customer Satisfaction Program” ([CSP-17N03](#)) stating categorically that the vehicles were “safe.” The CSP, in spite of owners concerns about Carbon Monoxide exposure, stated the Carbon Monoxide levels do not “exceed what people are exposed to every day,” yet for “peace of mind” Ford was offering a no-cost service reducing the potential for exposure for MY 2011-2017 Explorers.

In EA 17-002, NHTSA indicated the most likely culprit for the exposure of Ford consumers to potentially lethal amounts of Carbon Monoxide was cracked exhaust manifolds. Nonetheless, the CSP focused on less expensive and potentially less effective repairs such as sealing the interior of the cabin to reduce the potential for exhaust to enter the vehicle. The [dealer bulletin associated with CSP-17N03](#), which was eventually sent to Ford dealers and mechanics, did not vary dramatically from the TSBs (TSB 12-12-4 which was superseded by [TSB 14-0130](#), and [TSB 16-016](#)) Ford had been quietly issuing since 2012 to address this very same issue.

On October 16, 2017, the Center for Auto Safety [called on](#) Ford to expand the CSP to a recall to better ensure that all 1.3 million covered Explorers received the service. Consumers respond more quickly to safety recalls as opposed to letters suggesting that service is optional and unnecessary. Furthermore, recalls are tracked by NHTSA for a full six quarters and include mandatory reporting, and create a mechanism for determining the effectiveness of the repair, none of which applies to a CSP.

In the intervening months, we have continued to be contacted by Ford consumers experiencing symptoms related to Carbon Monoxide exposure in their Explorers. Some had brought their Explorers in to dealerships to receive repairs prior to the issuance of CSP-17N03. Others brought their Explorers in after the issuing of the CSP. In both instances, there were very few reports of consumers feeling “peace of mind” or “safe[r].”

As of early January 2018, there have been at least 1381 complaints submitted to NHTSA alone citing exhaust gases or odors entering vehicle cabins. This is an almost 900 percent increase since NHTSA opened PE16-008. Hundreds of these complaints indicate loss of consciousness, nausea, headaches, or light headedness while operating Ford Explorers. Owners reported more than 80 injuries to NHTSA, while many others who experienced identical symptoms chose not to record an injury in their complaint.

Examples of incidents include:

- Ford Customer in Ramona, CA purchased a 2015 Explorer. Complained of exhaust

smell when accelerating resulting in flu-like symptoms, headache, and loss of sense of smell. Multiple trips to her Ford dealership since 2014, did not resolve the problem. After an attempted repair in 2017, Ford Customer's CO detector reported levels as high as 53ppm. Even after November 22, 2017 repair attempt, detector continues to record CO in vehicle.

- Ford Customer in Lafayette, LA purchased a 2015 Explorer. Complained of foul odor every time she drove the vehicle. Upon taking an out of state trip in 2017, had trouble staying awake, complained of headaches, and believes her cat passed out due to CO exposure. Dealership told her the odor was "the new smell burning off the exhaust." Independent analysis found cracks in the exhaust manifold.
- Ford Customer in Upper Marlboro, MD, purchased a 2015 Explorer. Early on this Ford Customer complained of an odor but was told the odor was because it was a new car. After each of two trips in the vehicle for 25-30 miles, her granddaughter had to be taken to a hospital due to CO symptoms and was diagnosed as having had a seizure. Her grandson vomited twice after a lengthy car ride. She tested her vehicle and found CO in the cabin.
- Ford Customer in Fair Oaks, CA was driving a 2015 Explorer, and reported feeling nauseous, sleepy, and suffering from headaches. In December 2017, despite receiving the service under CSP-17N03, customer continued to report feeling ill inside the vehicle.
- Ford Customer in Ottumwa, IA, was driving a 2014 Explorer with an 18-month-old infant in the rear of the vehicle. The child became unresponsive, necessitating the driver pull off the highway and call 911. After release from the Emergency Room, the child was placed back in Explorer and within 5 minutes again became unresponsive. Rolling down the window assisted in bringing the child back to responsiveness. Dealer provided no assistance.
- Ford Customer in Santa Rosa, CA passed out while driving a 2016 Explorer on the freeway causing the vehicle to go off the roadway resulting in a total loss.
- Ford Customer in Clearwater, FL, passed out twice while driving two different Explorers – one a 2015 and one a 2016. Both incidents resulted in hospitalization – one due to broken ribs, shoulder blade and lumbar as a result of a crash due to loss of consciousness.

These 1381 complaints do not include non-duplicative complaints filed with the Center for Auto Safety, or more importantly, those filed with Ford. As of July 27, 2017, Ford publicly reported over 2,000 complaints. We are not aware of updated public reporting of the current number of complaints to Ford regarding this issue, but based on past experience we expect the figure has increased. Because CSPs do not require public

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reporting (and can be arbitrarily terminated or extended at any time) there is no way for NHTSA or the public to assess the effectiveness of the CSP – or how many Explorer owners even received the “repair.”

Despite the thousands of complaints, incidents, and injuries, there are no reported deaths associated with this dangerous defect - yet. It is easy to imagine a roadside crash caused by Carbon Monoxide exposure resulted in a fatality but was written off as “drowsy driving.” It is possible that Ford and Ford’s customers have just been lucky up until this point, but the time for Ford to take more serious action is now, before that luck runs out.

We appreciate your prompt attention to this matter.

Sincerely,

A handwritten signature in black ink, appearing to read "Jason Levine". The signature is fluid and cursive, with the first name "Jason" written in a larger, more prominent script than the last name "Levine".

Jason Levine
Executive Director

cc: Ms. Heidi King, Acting Administrator, NHTSA
Mr. Steven Ridella, Director, ODI, NHTSA