



U.S. Department
of Transportation

**National Highway
Traffic Safety
Administration**

Administrator

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

FEB 13 2004

Mr. Clarence M. Ditlow
Executive Director
Center for Auto Safety
1825 Connecticut Avenue, NW, Suite 330
Washington, DC 20009-1160

NVS-216 mjj
Ref. # 10049866

Dear Mr. Ditlow:

Thank you for your correspondence dated November 25, 2003, concerning a defect investigation conducted by the National Highway Traffic Safety Administration's (NHTSA) Office of Defects Investigation (ODI) into engine stalling in model year (MY) 2000 through 2002 Ford Motor Company (Ford) Focus vehicles. Your correspondence was received on December 4, 2003.

As you are aware, on April 4, 2002, ODI opened a defect investigation (PE02-040) after receiving reports from vehicle owners alleging loss of engine power and engine stalling symptoms in MY 2000 and 2001 Ford Focus vehicles. Data collected by ODI during the preliminary evaluation indicated that the stalling symptoms were primarily due to clogging of the fuel delivery module (FDM) in the subject vehicles. On September 6, 2002, ODI upgraded the investigation to an engineering analysis (EA02-022) and expanded the scope of the investigation to include MY 2002 Ford Focus vehicles, which were manufactured with different FDM filtering designs. I have enclosed the opening and closing resumes for PE02-040 and EA02-022 for your information.

During its investigation, ODI conducted a thorough analysis of reports in our consumer complaint database and data submitted by Ford in response to information requests. We interviewed many vehicle owners who experienced stalling symptoms and conducted numerous test drives to gain a full understanding of the phenomenon. Additionally, NHTSA's Vehicle Research and Test Center analyzed samples of contaminated FDMs and assessed the affect on steering and braking that could result from an engine stall in the subject vehicles. It became clear that the problem is progressive in nature. In other words, stalling symptoms take months or years to develop and gradually worsen if the FDM is not replaced. More than 90 percent of the consumer complaints and warranty replacements pertain to the "original design" FDM that was installed in MY 2000 and some MY 2001 Ford Focus vehicles, as opposed to "interim design" and "current design" FDMs installed in the rest of the subject vehicles.

Following extensive negotiations, by letter dated November 19, 2003 (copy enclosed), Ford notified NHTSA that it would conduct a campaign to replace the FDM in all Focus vehicles with the "original design" FDM that exhibit any symptoms of an engine stalling condition, which include engine hesitation, loss of engine power, surging, and other similar drivability symptoms. This offer is valid for a period of 10 years from the original warranty start date, with no limitation on vehicle mileage. NHTSA officials reviewed the letters that Ford proposed to send to owners and to its dealers and required Ford to make significant modifications to ensure that the campaign would be conducted properly. Owners will be able to obtain the free remedy whenever they experience any stalling symptoms, without any need for dealer confirmation of a problem with the FDM.

NHTSA does not agree with the assertions Ford made in its November 19, 2003, letter concerning the safety consequences associated with stalling. On November 21, 2003, Mr. Kenneth N. Weinstein, NHTSA's Associate Administrator for Enforcement, wrote to Ford to advise the company of the agency's views on that issue and to explain why we decided to accept this resolution of the investigation (copy enclosed).

MY 2001 and MY 2002 Ford Focus vehicles equipped with the "interim design" and "current design" FDMs have experienced a far lower rate of stalling complaints than the vehicles covered by Ford's safety campaign. Therefore, ODI decided to close the investigation without requiring any action with respect to those vehicles at this time. However, because these vehicles have not been on the road for as long as those vehicles with the "original design" FDM, ODI will monitor the performance of those vehicles to determine whether future action is appropriate.

I hope this information is helpful. For further details, please review the closing report for EA02-022 (copy enclosed). If you have any questions, please contact Mr. Ronald L. Medford, Senior Associate Administrator for Vehicle Safety, at (202) 366-1810.

Sincerely yours,

A handwritten signature in black ink, appearing to read "Jeffrey W. Runge", with a long horizontal flourish extending to the right.

Jeffrey W. Runge, M.D.

Enclosures