

- 1 turn testing at the Arizona Proving Ground from
2 January through May, 1982. Is that right?
- 3 A That's correct.
- 4 Q And it never tested the Bronco II again on track in
5 limits maneuvers until May, 1989. Is that right?
- 6 A No. It's not correct. I think we just testified that
7 ...that we did...
- 8 Q Well, let me ask...
- 9 A ...lane change and cornering maneuvers in limit
10 conditions.
- 11 Q Okay. Let me ask you this way. Did it take the
12 vehicle out and do limits J-turn testing again, with
13 outriggers on, at any time from May, 1982, until May,
14 1989?
- 15 A No. I don't believe so.
- 16 Q Instead of doing further limits J-turn evaluations
17 with outriggers; after May, 1982, Ford chose to go to
18 computer simulations using the Unihand and Adams
19 computer programs. Right?
- 20 A That's correct.
- 21 Q Now, there was a reason why Ford stopped J-turn

Cross-Ex of Ford
engineer James
McClure in
Ammerman v. Ford

1 testing in...with limits testing in 1982. Wasn't
2 there, sir?

3 A Yes.

4 Q Tell the Jury, if you will, what happened in the last
5 limits J-turn test that Ford did at the Arizona
6 Proving Ground in May, 1982. What happened to that
7 Bronco II?

8 A The...under the J-turn maneuver, the vehicle went up
9 on two wheels, the outrigger failed, it dug into the
10 cement and pole-vaulted the vehicle over.

11 Q And it landed on its top.

12 A It rolled over. Where it landed, I don't recall.

13 Q So is it correct, sir, that the reason that Ford Motor
14 Company stopped limit J-turn testing of the Bronco II
15 vehicle in May, 1982, and went to the computer
16 simulation was concern about occupant safety?

17 A Well, its concern about the safety of our track
18 drivers, yes.

19 Q Yes.

20 A And our engineers.

21 Q So you stopped doing the severe limits J-turn testing

- 1 in May, 1982, because you were concerned about your
2 own test drivers. Right?
- 3 A Right.
- 4 Q You were concerned about the safety of your own test
5 drivers. Right?
- 6 A Yes. Because of the...we couldn't depend on the
7 outriggers on supporting the vehicle.
- 8 Q Now, that was eight months before job one. Is that
9 right?
- 10 A That is correct.
- 11 Q Mr. McClure, would you agree with me that the Bronco
12 II was a very successful product for the Ford Motor
13 Company from the standpoint of sales?
- 14 A I believe it was. I don't recall the exact sales
15 figures.
- 16 Q Something over 700,000 were sold. Is that true?
- 17 A Yes.
- 18 Q Actually, Ford sold almost fifty percent (50%) more
19 than it had originally projected to sell. Is that
20 right?
- 21 A I...I'm not privy to that information. I...

1 Q Okay. And what's the date that you signed off th
2 handling of the Bronco II vehicle, sir?

3 A I believe it was just prior to that in November o
4 1982.

5 Q Okay. As of November 15, 1982, Mr. McClure, based o
6 your knowledge and position in the program, was th
7 handling and stability of the Bronco II program
8 major risk issue?

9 A No. It was not.

10

MR. HULTIN: Mr. Barnhart.

11

12

THE COURT: Okay. You may cros
examine.

13

14

15

MR. BARNHART: Thank you, Your Honor.

16

17

CROSS EXAMINATION

18

QUESTIONS BY W. RANDOLPH BARNHART, ESQ.

19

20

21 Q Mr. McClure, Ford tested the Bronco II in limits J

Cross-Exy Ford engineer
James McClure in
Ammerman v. Ford

EXHIBIT
AF