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March 2, 2012

Ms. Jennifer T. Timian, Chief Recall Management Division Office of Defects Investigation National Highway Traffic Safety Administration 1200 New Jersey Avenue SE, Room W48-302 Washington, DC 20590

Dear Ms. Timian:

Subject: EQ12-002:NVS-215aa

This is the Ford Motor Company (Ford) response to the agency's February 23, 2012, information request concerning certain Autoliv ASP, Inc. (Autoliv) side curtain airbag inflators that were manufactured by Autoliv with an incorrect initiator propellant formulation, and were supplied to Ford for use in certain Ford and Lincoln vehicles.

The side curtain airbag inflators that were manufactured by Autoliv with an incorrect initiator propellant formulation (5 micron titanium hydride slurry mixture instead of 1.8 micron titanium hydride slurry mixture) included both Autoliv ACH2.0B and ACH2.1B model inflators. ACH2.0B inflators were supplied by Autoliv to Takata Holdings Inc. who used them as part of an airbag module that was then delivered to Ford and installed in certain 2012 model year Ford Fusion and Lincoln MKZ vehicles. ACH2.1B inflators were supplied to Ford directly by Autoliv and installed in certain 2012 model year Ford F-150 vehicles.

On February 1, 2012, Autoliv notified Ford of the potential issue with the initiator propellant formulation. Ford personnel worked closely with Autoliv to evaluate the potential effect that incorrect initiator propellant could have in Ford applications. For the evaluation, Autoliv produced initiators using the actual production process with the incorrect propellant formulation. Two thousand of these initiators were assembled into ACH2.0B and ACH2.1B model inflators of various diameters and lengths. Autoliv then tested these inflators at 23 degrees Celsius and at temperatures as low as -40 degrees Celsius. All inflators reportedly deployed normally. A summary of these test results was included in Autoliv's letter to the agency dated February 17, 2012. Based on these test results, Ford agrees with Autoliv's assessment as stated in their February 17, 2012, letter to the agency that ACH2.0B

and ACH2.1B model inflators manufactured with the 5 micron titanium hydride slurry mixture in the initiator will deploy properly in Ford vehicles even with the incorrect initiator propellant formulation. Accordingly, there is no safety related defect or non-compliance condition in Ford vehicles that results from the condition described by Autoliv, and a recall is unnecessary.

Please contact me if you have any questions concerning this response.

Steven M. Kenner