



U.S. Department
of Transportation
**National Highway
Traffic Safety
Administration**

1200 New Jersey Avenue SE.
Washington, DC 20590

APR - 2 2015

Mr. Matthew Oliver
Executive Director
North Carolina Consumers Council, Inc.
3733 National Dr. Ste. 115
Raleigh, NC 27612-4845

NVS-212
DP15-002ef

Dear Mr. Oliver:

This letter acknowledges receipt of your petition, received by the National Highway Traffic Safety Administration's (NHTSA) Office of Defects Investigation (ODI) on February 11, 2015, requesting that NHTSA open an investigation into headlight module failures in model year 2003-2005 Ford Crown Victoria and Mercury Grand Marquis vehicles. Your petition has been assigned the identification number DP15-002. A copy of the opening resume denoting receipt of the petition is attached for your information.

In accordance with Title 49 CFR Part 552, "Petitions for Rulemaking, Defects, and Noncompliance Orders," NHTSA will conduct a review of the petition and other pertinent information and will notify you further upon completion.

Sincerely,

Otto Matheke
Acting Director, Office of Defects Investigation

Enclosure:
DP15-002 Opening Resume



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ODI RESUME

Investigation: DP 15-002
Prompted by: Defect Petition
Date Opened: 04/01/2015
Investigator: Evan Frings
Approver: Frank Borris
Subject: Loss of headlamp/exterior lighting
Reviewer: Scott Yon

MANUFACTURER & PRODUCT INFORMATION

Manufacturer: Ford Motor Company
Products: 2003-2005 Ford Crown Victoria and Mercury Grand Marquis
Population: 517,945
Problem Description: Failure of the front lighting control module resulting in loss of headlights and/or all exterior lighting while driving.

FAILURE REPORT SUMMARY

	ODI	Manufacturer	Total
Complaints:	1	TBD	TBD
Crashes/Fires:	0	TBD	TBD
Injury Incidents:	0	TBD	TBD
Number of Injuries:	0	TBD	TBD
Fatality Incidents:	0	TBD	TBD
Number of Fatalities:	0	TBD	TBD
Other*:	604	TBD	TBD

*Description of Other: Complaints received by NHSTA as identified by petitioner.

ACTION / SUMMARY INFORMATION

Action: Further Evaluate the Defect Petition for a Grant/Deny Decision.

Summary:

The Office of Defects Investigation (ODI) has received a petition from the North Carolina Consumers Council, Inc. requesting a defect investigation of an alleged defect condition resulting in headlight and/or exterior lighting failure on 2003-2005 Ford Crown Victoria and Mercury Grand Marquis vehicles. The petition letter is attached for review.

The petitioner alleges a defect in the lighting control module that powers the headlights which can result in the loss of vehicle headlights and/or all exterior lighting while driving. ODI has previously investigated this issue under PE08-066 which was closed without a defect finding. The petitioner notes that Ford recently extended the subject vehicle warranty for this part to 15 years or 250,000 miles (Ford customer satisfaction campaign 12N01), states that service replacement parts were not readily available for warranty repairs at the time of the petition submission, and requests that a new defect investigation be opened.

A defect petition has been opened to evaluate the issue and make a grant or deny decision.



NORTH CAROLINA CONSUMERS COUNCIL, INC.

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(800) 887-5620 | www.NCconsumer.org

Matthew Oliver
Executive Director
North Carolina Consumers Council, Inc.
3733 National Dr Ste 115
Raleigh, NC 27612-4845

Administrator
National Highway Traffic Safety Administration
400 Seventh St, SW
Washington DC, 20590

October 2, 2014

Petition for Defect Investigation into MY 2003-2005 Ford Crown Victoria and Mercury Marquis Vehicles Experiencing Lighting Control Module Failures

To Whom It May Concern:

I am writing to request a defect investigation into MY 2003-2005 Ford Crown Victoria and Mercury Marquis vehicles for headlight control module failures resulting in a loss of headlamp function and/or loss of all exterior lighting.

The North Carolina Consumers Council (NCCC) is a nonprofit organization promoting consumer education, consumer awareness and consumer protection in North Carolina. It is based in Raleigh, North Carolina. Our office has received complaints regarding these vehicles. We have and continued to refer complainants to your website to complete a Vehicle Owner Questionnaire.

We have recently been contacted regarding a 2005 Mercury Grand Marquis belonging to [REDACTED] (Herein "Complainant") of [REDACTED]. The vehicle bears Vehicle Identification Number 2MEFM75W15X [REDACTED] and has been diagnosed as having a failed lighting control module by a Ford dealership.

This vehicle, as well as the vehicles for which this petition requests investigation, is subject to Ford Custom Satisfaction Program 12N01 (Herein "Program"), also identified as CSC-10055936-9809, a generic copy of which is provided with this petition. The Program references an extended warranty for the subject vehicles for the lighting control module for a period of fifteen (15) years or 250,000 miles. For those vehicles exceeding this coverage, the Program expires 10/31/2014.

The subject vehicles had previously been investigated under Preliminary Analysis PE08066 opened 11/26/2008 and closed 03/24/2009. The investigation was closed by your office with the statement that "a safety-related defect has not been identified at this time and further use of agency resources

does not appear to be warranted" despite 206 consumer complaints to your office, 2,074 warranty claims reported to Ford, and Ford's own admission that the lighting control modules contained defective solder joints on the printed circuit board.

As of today, there appear to be 604 consumer complaints on your website with seven (7) reports of vehicle crashes relating to the failure of the lighting control module and the subsequent failure of vehicle lighting while driving. This data indicates that the failure rates for the components is increasing with age. A search of complaint data on your website appears to indicate that the failure does not apply to vehicles manufactured since MY 2006.

Despite the Program by Ford, Ford dealerships are reporting that replacement lighting control modules are not available for the subject vehicles and have not been available since May 2014. Ford dealership personnel are unable to advise when parts might come available. According to the Complainant, Ford Motor Company Customer Relationship Center representatives are unable to assist and unable to advise when replacement parts will be available. As such, vehicle owners with failed lighting control modules continue to drive their unrepaired vehicles.

It is important to note that the language in the Program letter advises consumers not to present a vehicle for repair unless the vehicle has both headlights inoperative when the headlight switch is on. As Ford has previously acknowledged in the aforementioned Preliminary Analysis that these modules may contain defective solder joints on the printed circuit board, a safety recall, not an extended warranty, appears warranted.

Due to the number of complaints, the information provided in the aforementioned Preliminary Analysis, and the unavailability of replacement parts despite an extended warranty being in place, I am requesting on behalf of the Complainant and the motoring public that a new defect investigation be opened concerning this matter for the subject vehicles, to be expanded at your discretion to include others models that share the same design part.

I appreciate your assistance, your response, and most importantly—your time.

Regards,

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

Matthew Oliver
Executive Director
North Carolina Consumers Council, Inc.

CSC-10055936-9809



Ford Motor Company
Ford Customer Service Division
P. O. Box 1904
Dearborn, Michigan 48121

April 2014

Customer Satisfaction Program 14N01
Programa de Satisfacción del Cliente 14N01

Mr. John Sample
123 Main Street
Anywhere, USA 12345

Your Vehicle Identification Number: 12345678901234567

At Ford Motor Company, it has been our goal for more than 100 years to provide customers with high-quality, dependable products. In order to maintain these standards, Ford Motor Company is providing additional coverage under Customer Satisfaction Program 14N01 for your vehicle, with the Vehicle Identification Number shown above.

What is the reason for this additional coverage program?

On your vehicle, it may be possible that an electronic module (Lighting Control Module) that supplies power to the headlights may fail. This results in the headlamps not working properly except for the flash-to-pass operation.

In the interest of customer satisfaction, Ford Motor Company is extending the limited warranty on the Lighting Control Module to 15 years or 250,000 miles from the warranty start date of the vehicle, whichever occurs first.

This coverage exceeds the original warranty coverage provisions of your vehicle for this part.

What will Ford and your dealer do?

If the headlamps on your vehicle do not work properly and the module is the cause, Ford Motor Company has authorized your dealer to replace the module free of charge (parts and labor).

This is a one-time repair program.

If your vehicle has already exceeded the mileage limit, this coverage will last through October 31, 2014. Coverage is automatically transferred to subsequent owners.

How long will it take?

If the component mentioned above requires replacement, the time needed for this repair is less than one-half day. However, due to service scheduling requirements, your dealer may need your vehicle for a longer period of time.

What should you do?

You do not need to return to your dealer for this repair unless you experience both headlights not functioning properly when the headlight switch is "ON."

**What should you do?
(Continued)**

Please keep this letter as a reminder of the extended warranty coverage for your Lighting Control Module. If this component requires replacement, and your vehicle is within the indicated time/mileage limitations, contact your dealer for a service date. Provide the dealer with the Vehicle Identification Number (VIN) of your vehicle and request a service date for Customer Satisfaction Program 14N01. The VIN is printed near your name at the beginning of this letter. Your dealer will replace the part at no charge.

If you do not already have a servicing dealer, you can access www.Fordowner.com for dealer addresses, maps, and driving instructions.

**Have you previously
paid for this repair?**

If you paid for this repair before the date of this letter, you may be eligible for a refund. Refunds will only be provided for service related to headlights where the cause was the Lighting Control Module. To verify eligibility and expedite reimbursement, give your paid original receipt to your dealer before October 31, 2014. To avoid delays, do not send receipts to Ford Motor Company.

**What if you no longer
own this vehicle?**

If you no longer own this vehicle, and have an address for the current owner, please forward this letter to the new owner.

You received this notice because our records, which are based primarily on state registration and title data, indicate that you are the current owner.

**Can we assist you
further?**

If you have difficulties getting your vehicle repaired promptly and without charge, please contact your dealership's Service Manager for assistance.

RETAIL OWNERS: If you still have concerns, please contact the Ford Motor Company Customer Relationship Center at 1-866-436-7332 and one of our representatives will be happy to assist you. For the hearing impaired call 1-800-232-5952 (TDD). Representatives are available Monday through Friday: 8:00AM - 8:00PM (Eastern Time).

Si necesita ayuda o tiene alguna pregunta, por favor llame al Centro de Relación con Clientes al 1-866-436-7332 y presione 2 para Español.

If you wish to contact us through the Internet, our address is:

www.Fordowner.com.

FLEET OWNERS: If you still have concerns, please contact the Fleet Customer Information Center at 1-800-34-FLEET, Option #3 and one of our representatives will be happy to assist you. Representatives are available Monday through Friday: 8:00AM - 8:00PM (Eastern Time).

Or you may contact us through the Internet at www.fleet.ford.com.

Thank you for your attention to this important matter and remember to save this letter in case you need to take advantage of this additional coverage program.

Ford Customer Service Division