



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

AUG 11 2015

1200 New Jersey Avenue SE.
Washington, DC 20590

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

NVS-214
DP15-002ef

Dear Mr. Oliver:

This letter is in reference to your petition assigned the identification number DP15-002 and opened on April 1, 2015. In accordance with Title 49 CFR Part 552, "Petitions for Rulemaking, Defects, and Noncompliance Orders," NHTSA has conducted a review of the petition and other pertinent information and has decided to grant the petition. A Preliminary Evaluation (PE15-028, copy enclosed) has been opened to investigate the alleged defect. A copy of the opening resume for this investigation is attached for your review.

Sincerely,

Otto G. Matheke, III
Acting Director
Office of Defects Investigation

Enclosure: PE15-028 Opening Resume



U.S. Department
of Transportation

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ODI RESUME

Investigation: PE 15-028
Date Opened: 08/10/2015
Investigator: Evan Frings
Approver: Otto Matheke
Subject: Loss of headlights

Reviewer: Scott Yon

MANUFACTURER & PRODUCT INFORMATION

Manufacturer: Ford Motor Company
Products: MY 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 while driving.

FAILURE REPORT SUMMARY

	ODI	Manufacturer	Total
Complaints:	605	3,092	3609**
Crashes/Fires:	4	11	15
Injury Incidents:	0	1	1
Number of Injuries:	0	1	1
Fatality Incidents:	0	0	0

** Total eliminates duplicates received by ODI and manufacturer.

ACTION / SUMMARY INFORMATION

Action: Open a Preliminary Evaluation.

Summary:

After receiving a defect petition (DP15002) concerning the loss of headlights and other exterior lighting in model year (MY) 2003-2005 Ford Crown Victoria and Mercury Grand Marquis vehicles, the Office of Defects Investigation (ODI) analyzed Vehicle Owner Questionnaire (VOQ) complaints received from consumers and identified a total of 605 reports (for all submission dates) alleging headlight failure. The complaints indicate failures of both low beam headlights typically while driving, a defect condition that was evaluated under a prior ODI investigation (PE08066).

Most consumer VOQs indicate that the headlights failed suddenly and without warning leaving the driver with no forward lighting, however some report the headlights flickered or dimmed prior to turning off. In some cases drivers were able to turn the headlights back on after a period of time while others reported the headlights would not come back on at all. Consumers noted they were able to hold the "flash to pass" lever on the steering column mounted stalk to activate the high beams however this is only effective as long as the lever is actuated. ODI identified 4 VOQ reports alleging minor crash or loss of control incidents due to headlight failures. Drivers indicated running off of the road due to a lack of headlights and one driver reportedly struck a deer. No injuries were indicated in the VOQ crashes.

In response to ODI's April 7, 2015 Information Request letter, Ford provided data indicating it has received 3,092 complaints of failed headlights related to the Lighting Control Module (LCM), a device that controls the headlights and other lighting functions. This number includes the complaints Ford reviewed and classified as headlight failure due specifically to the LCM. Within Ford's complaints, there are 11 reports alleging a crash occurred. These drivers reported hitting objects, including other vehicles after the headlights failed causing damage to the affected vehicles. One driver was injured when their car struck an unseen object in the road, jerking the steering wheel from their hands and injuring their shoulder. In total 15 crash allegations were identified, all of which have occurred since ODI's prior evaluation of this issue.

In review of VOQ and Ford data ODI found little evidence of other exterior lighting failures, headlight failures alone made up the bulk of the complaints. Accordingly loss of headlights will be the subject of this investigation. NHTSA is opening this investigation to further evaluate the scope, frequency, and consequence of the alleged defect.

The ODI reports cited above can be reviewed at www-odi.nhtsa.dot.gov/owners/SarchNHTSAID under the identification (ODI) numbers found in the attached list.

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