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James P. Vondale, Director Automotive Safety Office Environmental & Safety Engineering BEFECTS LIVESTIGATION

(4 pages)

December 17, 2004

Mr. Kenneth N. Weinstein Associate Administrator for Safety Assurance National Highway Traffic Safety Administration 400 Seventh Street, S.W. Washington, D.C. 20590

Dear Mr. Weinstein:

Subject: Ford Recall No. 04C09 – Rear Liftgate Latch Non-compliance to FMVSS 206 for the following: 1) All 2004 Model Year Ford Escape Vehicles; 2) Certain 2005 Model Year Ford Escape Vehicles; and 3) Certain 2001 through 2003 Model Year Ford Escape Vehicles. Having Rear Liftgate Components Serviced with 2004 Model Year Equivalent Components.

Summary

- Ford Action Ford Motor Company (Ford) is conducting a voluntary compliance recall involving the following vehicles: 2004 model year Ford Escape vehicles manufactured June 9, 2003 through January 23, 2004 and certain 2005 model year Ford Escape vehicles manufactured from December 19, 2003, through August 27, 2004, to replace certain components in the rear liftgate door. Also included are any 2001 through 2003 model year Ford Escape vehicles that were serviced with 2004 model year design level rear liftgate latch components.
- <u>Number of Vehicles Involved</u> Approximately 262,113 vehicles in the United States and Federalized Territories.
- <u>Description of Non-Compliance</u> The latch supplier's original calculations used to demonstrate regulatory compliance of the rear liftgate latching system to certain FMVSS 206 requirements on affected vehicles incorrectly applied accelerations in the vehicle longitudinal (X), transverse (Y), and vertical (Z) directions rather than in the Load 1, Load 2, and Load 3 directions specified in S4.4.1.4 of the regulation. When the calculations were performed in the correct directions, the rear liftgate latching system on the 2004 and 2005 model year subject vehicles did not meet the FMVSS 206 Inertia Load requirement in one direction.
- <u>Service Procedure</u> Owners will be instructed to take their vehicles to a Ford or Lincoln-Mercury dealer to have certain rear liftgate latch system components replaced.



Ford crash tests did not result in inertial unlatching of the liftgate on the affected vehicles and there are no claims or lawsuits related to inertial unlatching of the rear liftgate.

Attached is the detailed information required by the applicable portions of 49 CFR Part 573 - Defect and Non-Compliance Information Report.

Sincerely,

James P. Vondale

Attachment

49 CFR Part 573 – NON-COMPLIANCE INFORMATION REPORT 04C09 – ALL 2004 AND CERTAIN 2005 MODEL YEAR FORD ESCAPE VEHICLES

Pursuant to Part 573 of Title 49 of the Code of Federal Regulations, Defect and Noncompliance Reports, Ford Motor Company (Ford) submits the following information concerning a potential non-compliance to the requirements of FMVSS 206 and a field action that it is voluntarily initiating.

573.6 (c) (2) - Potentially Affected Vehicles

Vehicles potentially affected are: 2004 model year Ford Escape vehicles manufactured from June 9, 2003 through January 23, 2004 and certain 2005 model year Ford Escape vehicles manufactured from December 19, 2003 through August 27, 2004. Also included are any 2001 through 2003 model year Ford Escape vehicles that were serviced with the same design level parts as the 2004 model year rear liftgate latch components.

Because these vehicles are not produced in VIN order, information as to the applicability of this action to specific vehicles can best be obtained by either calling Ford's toll-free line (1-800-392-3673) or by contacting a local Ford or Lincoln-Mercury dealer who can obtain specific information regarding the vehicles from the Ford On-line Automotive Service Information System (OASIS) database.

573.6 (c) (3) - Estimated Population of Vehicles Potentially Affected

Approximately 262,113 vehicles in the United States and Federalized Territories.

573.6 (c) (4) - Estimated Percentage of Affected Vehicles with the Condition

All of the subject vehicles are expected to have this condition.

573.6 (c) (5) - Description of Non-Compliance

The latch supplier's original calculations used to demonstrate regulatory compliance of the rear liftgate latching system to certain FMVSS 206 requirements on the affected vehicles incorrectly applied accelerations using the vehicle longitudinal (X), transverse (Y), and vertical (Z) directions rather than in the Load 1, Load 2, and Load 3 directions as specified in S4.4.1.4 of the regulation. When the calculations were performed in the correct directions, the rear liftgate latching system on the 2004 and 2005 model year subject vehicles did not meet the FMVSS 206 Inertia Load requirement in one direction.

573.6 (c) (7) – Basis of Non-Compliance Determination

On September 20, 2004, the latch supplier advised Ford that the calculations used to demonstrate compliance of the rear liftgate latching system to FMVSS 206 for certain 2005 model year subject vehicles may have been done incorrectly. Ford engineering undertook the following actions: 1) An independent review of the supplier calculations by Ford engineers to verify accuracy and methodology; 2) A complete statistical and dimensional review of in-production components comprising the 2005 model year rear liftgate latching system; 3) A complete statistical and dimensional review of production components (based on availability of these parts) comprising the 2004 model year rear liftgate latching system; and 4) Once dimensional values were obtained for the 2004 and 2005 model year components, performed calculations in the proper direction to determine compliance to FMVSS 206 in S4.4.1.4. These calculations were completed on November 30, 2004.

573.6 (c) (7) – Basis of Non-Compliance Determination (Continued)

On December 10, 2004, the Ford Field Review Committee determined that the affected 2004 and 2005 model year vehicles are non-complaint to the FMVSS 206 requirements. In addition, any 2001 through 2003 model year subject vehicles that were serviced with 2004 model year design level rear liftgate latching system components may have been rendered non-compliant to FMVSS 206.

573.6 (c) (8) - Service Program

For affected 2004 model year vehicles dealers will be instructed to replace the rear liftgate latch release rod, the release rod attachment clip and the door handle return spring. For affected 2005 model year vehicles, dealers will be instructed to replace the rear liftgate latch release rod and the release rod attachment clip. The 2001 through 2003 model year vehicles that were serviced as described above will have the same components replaced as described for the 2004 model year subject vehicles.

There will be no charge to owners for this service. Mailing of owner notification letters will begin on January 24, 2005 and be completed on or before January 26, 2005. Ford's general reimbursement plan for the cost of remedies paid for by vehicle owners prior to notification of a safety recall was provided to the agency on February 28, 2003.

573.6 (c) (9) - Press Statement and Dealer/Owner Letters

Ford does not at this time plan to make a statement to the media concerning the subject matter of this action. A copy of the Notification letters to dealers and owners from Ford will be forwarded to the agency when available.

573.6(c) (11) - Recall Number

Ford has assigned recall number 04C09 to this action.

573.13 (c) (2) - Ending Date for Reimbursement Eligibility

The ending date for reimbursement eligibility for cost of remedies paid for by vehicle owners per Ford's general reimbursement plan is February 7, 2005.