



RECEIVED
DVB-215

2006 APR -7 A 10: 02

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

OFFICE OF
DEFECTS INVESTIGATION

Fairlane Plaza South
330 Town Center Drive
Dearborn, MI 48126-2738 USA

April 3, 2006

Daniel C. Smith
Associate Administrator for Safety Assurance
National Highway Traffic Safety Administration
400 Seventh Street, S.W.
Washington, D.C. 20590

06V-111
(4 pages)

Dear Mr. Smith:

Subject: Ford Motor Company (Ford) Recall No. 06C12 - Certain 2005 Model Year Ford Escape and Mercury Mariner Vehicles.

Summary

- Ford Action - Ford is conducting a voluntary compliance recall involving certain 2005 model year Ford Escape and Mercury Mariner vehicles to modify the headliner to address a potential FMVSS 201 Occupant Protection Interior Impact non-compliance.
- Number of Vehicles Involved - Approximately 134,365 vehicles in the United States and federalized territories.
- Description - A 2005 Ford Escape was tested by the National Highway Traffic Safety Administration (NHTSA) on November 15, 2005, to the requirements of FMVSS 201, Occupant Protection in Interior Impact. The test procedure used by NHTSA resulted in a Head Injury Criterion (HIC) value of 1077 at the AP1 target, located on the headliner near the A-pillar/roof rail on the left hand side of the vehicle. The regulatory requirement is 1000. Ford conducted extensive testing in its good faith determination of compliance to the requirement, and that testing demonstrated a significant compliance margin. Ford believes that the result obtained by NHTSA versus the results obtained in the many Ford tests demonstrates the appropriateness of the comments made by the Alliance of Automobile Manufacturers that questioned the objectivity and practicability of the rule because of the infinite number of test conditions possible, as a result of the wide range of possible horizontal and vertical approach angles. Nonetheless, we are conducting this action to avoid a protracted dispute with the agency.

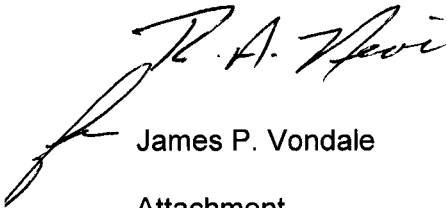


- Service Program

Ford notified dealers to stop demonstrating or delivering the affected vehicles until the headliners have been inspected and, if necessary, modified. Ford will notify owners and instruct them to take their vehicles to a Ford or Lincoln-Mercury dealer to inspect and, if necessary, modify the headliner.

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

Sincerely,

A handwritten signature in black ink, appearing to read "J. P. Vondale". The signature is written in a cursive style with a long, sweeping underline that extends to the left.

James P. Vondale

Attachment

49 CFR Part 573 - NON-COMPLIANCE INFORMATION REPORT
06C12 - CERTAIN 2005 MODEL YEAR FORD ESCAPE AND MERCURY MARINER VEHICLES
FMVSS 201 UPPER INTERIOR HEAD IMPACT

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 noncompliance to the requirements of Section S6.1(a) of FMVSS 201 for certain 2005 model year Ford Escape and Mercury Mariner vehicles.

573.6 (c) (2) - Potentially Affected Vehicles

Certain Ford Escape and Mercury Mariner vehicles manufactured without side air curtains or moonroofs built from Job #1 through March 31, 2005, at the Kansas City Assembly Plant and the Ohio Assembly Plant are potentially affected.

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 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 134,365 vehicles in the United States and federalized territories.

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

All of these vehicles are affected.

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

A 2005 Ford Escape was tested by the National Highway Traffic Safety Administration (NHTSA) on November 15, 2005, to the requirements for FMVSS 201, Occupant Protection in Interior Impact. The test procedure used by NHTSA resulted in a Head Injury Criterion (HIC) value of 1077 at the AP1 target, located on the headliner near the A-pillar/roof rail on the left hand side of the vehicle. The regulatory requirement is 1000.

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

A 2005 Ford Escape was tested by the National Highway Traffic Safety Administration (NHTSA) on November 15, 2005, to the requirements of FMVSS 201, Occupant Protection in Interior Impact. The Head Injury Criterion (HIC) calculation result at target AP1, located on the A-pillar/roof rail on the left hand side of the vehicle was in excess of the regulatory requirement of 1000 HIC(d). On February 8, 2006, Ford conducted a test on the left hand side AP1 target to test parameters used by NHTSA in the November 15, 2005, test and produced HIC(d) results in excess of the values

allowed by standard 201. Results were HIC(d) 1081. The right hand side AP1 was also tested to the test parameters used by NHTSA in the November 15, 2005, test and the results were HIC(d) 990. Ford conducted extensive testing in its good faith determination of compliance to the requirement, and that testing demonstrated a significant compliance margin. Ford believes that the result obtained by NHTSA versus the results obtained in the many Ford tests demonstrates the appropriateness of the comments made by the Alliance of Automobile Manufacturers that questioned the objectivity and practicability of the rule because of the infinite number of test conditions possible, as a result of the wide range of possible horizontal and vertical approach angles. Nonetheless, we are conducting these actions to avoid a protracted dispute with the agency. As of March 2005, there are no known reports of injuries related to this condition.

573.6 (c) (8) Service Program

Ford notified dealers to stop demonstrating or delivering the affected vehicles until vehicle inspections and repairs are performed. Owners will be advised to contact their dealers to make arrangements for repair of their vehicles. Ford will notify owners and instruct them to take their vehicles to a Ford or Lincoln-Mercury dealer to have their vehicles serviced. The repairs will involve modification of the energy absorbing material located above the headliner in the affected area.

There will be no charge to owners for this service. Mailing of owner notification letters will begin May 30, 2006, and be completed by May 30, 2006. Notification to dealers via the Dealer Bulletin will begin on April 5, 2006, and be completed on April 5, 2006.

In accordance with Part 573.13 (d)(1), Ford is excluding reimbursement for costs incurred by owners for repair of this problem because Ford's original warranty program would provide for a free repair for this concern for customers.

573.6 (c) (11) -- Press statement and Dealer/Owner Letters

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

573.6 (c) (12) -- Recall Number

Ford has assigned recall number 06C12 to this action.