

07V-041 (4 pages)

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February 2, 2007

Mr. Daniel C. Smith Associate Administrator for Safety Assurance National Highway Traffic Safety Administration 400 Seventh Street, S.W., Room 5321 Washington, D.C. 20590

Dear Mr. Smith:

Subject: Land Rover Recall No. P002 -- 2002 through 2005 Model Year Land Rover

Freelander Brake Lamp Switches

# Summary

<u>Action</u> – Land Rover, which is a wholly owned subsidiary of Ford Motor Company (Ford), at the request of the agency is conducting a voluntary safety recall involving all 2002 through 2005 model year Land Rover Freelander vehicles built at the Solihull (UK) Assembly Plant from September 5, 2001, through May 19, 2005, to initially inspect the brake lamp operation and adjust as required. Once redesigned parts become available all vehicles will be fitted with a replacement brake lamp switch.

<u>Number of Vehicles Involved</u> – 33,247 vehicles in the United States and Federalized Territories.

<u>Affect on Vehicle Operation</u> – The brake lamps on Freelander vehicles may remain illuminated even when the brake pedal is not depressed. Hill Descent Control (HDC), Traction Control (TC), and Cruise Control warning lights may also be illuminated.

<u>Service Program</u> – Initially, dealers will be instructed to inspect the brake lamp operation and where required, adjust and/or replace the brake lamps switches with new switches of the same design until a newly designed brake lamp switch is available in May 2007. Once the new parts are available, owners will be renotified and dealers will replace the brake lamp switch with a newly designed switch and insert a link lead on the affected vehicles.

As the field data located through the investigation of this concern has demonstrated, brake lamps remaining illuminated do not, in Land Rover's opinion, pose an unreasonable risk to motor vehicle safety. However, in order to address the agency's concern and to respond to any

customer concerns, Land Rover is voluntarily taking this action as a safety recall. Attached is the detailed information required by the applicable portions of 49 CFR Part 573 - Defect and Non-Compliance Information Report.

Sincerely,

J. P. Vondale

Attachment

- 1 - ATTACHMENT

# 49 CFR Part 573 - DEFECT INFORMATION REPORT RECALL P002 – All 2002 through 2005 Model Year Land Rover Freelander Vehicles

Pursuant to Part 573 of Title 49 of the Code of Federal Regulations, Defect and Noncompliance Reports, Ford submits the following information concerning a safety recall action that its wholly owned subsidiary, Land Rover, is voluntarily initiating.

#### 573.6 (c) (2) - Potentially Affected Vehicles

All 2002-2005 model year Land Rover Freelander vehicles built at the Solihull (UK) Assembly Plant from September 5, 2001, through May 19, 2005, within VIN range SALNM22222A353298 to SALNY22255A491300, are potentially affected.

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

33,247 vehicles in the United States and Federalized Territories.

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

Unknown

# 573.6 (c) (5) -- Description of the Defect

The issue relates to the interface between the pedal box and the brake lamp switch. The brake lamp switch may become maladjusted as a result of incorrect setting procedure during vehicle manufacture or as a result of switch mounting bracket flex. A maladjusted switch may allow the contacts to remain permanently connected as the switch has reached the extent of its travel, which may result in the brake lights remaining permanently illuminated.

#### 573.6 (c) (6) -- Chronology of Events

Although Land Rover was aware of the brake lamp concern as early as March, 2003, it was considered to be a quality issue and not a safety issue, as the failure mode results in the brake lights remaining continuously illuminated and the vast majority of the operators of vehicles with this condition become aware by being informed by other observers, their own observations or instrument panel warning lamps. This issue was added to the Land Rover Critical Concerns Review Group (CCRG) on February 8, 2006, following the opening of the Engineering Analysis, EA05-016, by the agency to investigate this concern.

The field data reviewed as the result of the EA05-016 investigation continued to support the Land Rover opinion that, although the condition of brake lights remaining illuminated presents a potential risk to safety, years of real world experience and data support that the potential risk is not unreasonable. With a majority of the potentially affected vehicles having more than 30 months in service, and although there are a number of reports of this condition, there are no reports or allegations of accidents or injuries relating to brake lamp switch concerns in these vehicles. Despite this, at the request of the agency, the Land Rover Field Review Committee met on January 26, 2007, where Land Rover management decided to voluntarily recall these vehicles to replace the brake switch.

# 573.6 (c) (8) Service Program

Dealers will be instructed to inspect the brake lamp operation and where required, adjust and/or replace the brake lamps switches with new switches of the same design. Once parts are available, dealers will replace the brake lamp switch with a newly designed switch and wireharness on the affected vehicles. There will be no charge to owners for this service. Land Rover anticipates that mailing of owner notification letters for the interim inspection will begin on or about March 8, 2007, and for the replacement of the brake lamp switches with the newly designed parts during the week commencing May 28, 2007.

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

Land Rover 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 Land Rover will be forwarded when available.

#### 573.6 (c) (1) -- Recall Number

Land Rover has assigned recall number P002 to this action