

RECEIVED 2008 JUNE 4 - 10:30 AM OFFICE OF RECALL MANAGEMENT DIVISION

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

June 2, 2008

Mr. Daniel C. Smith Associate Administrator for Safety Assurance National Highway Traffic Safety Administration 1200 New Jersey Avenue, SE/W45-231 Washington, DC 20590 Fairlane Plaza South 330 Town Center Drive Dearborn, MI 48126-2738 USA

> 08V-248 (4 Pages)

Dear Mr. Smith:

Subject: Land Rover Recall No. P045 -- 2005 and 2006 Model Year Land Rover LR3 and Range Rover Sport Vehicles for Steering Column Rotary Coupler (Clockspring) Wiring Fracture.

Summary

- <u>Action</u> Land Rover, which is an affiliate of Ford Motor Company (Ford), is conducting a voluntary safety recall involving 2005 and 2006 model year Land Rover LR3 and Range Rover Sport vehicles built at the Solihull (UK) Assembly Plant from November 1, 2004, through December 23, 2005, to improve the alignment of the steering column cowl to the column lock and if necessary, replace the clockspring drive peg sleeve with the current ribbed design.
- <u>Number of Vehicles Involved</u> 23,617 LR3 vehicles and 13,525 Range Rover Sport vehicles in the United States and Federalized Territories.
- <u>Affect on Vehicle Operation</u> Relative motion between the steering wheel hub and/or the steering column cowl with the clockspring, which includes the driver side air bag circuitry, could result in fracturing of the air bag wiring connection. If an airbag wire fractures, the SRS warning light will illuminate on the instrument cluster. The SRS warning light indicates to the driver that there is a concern with the SRS system in the vehicle and that immediate repair is necessary.

If the SRS warning light is ignored and a vehicle accident of sufficient severity to command deployment of the driver's airbag occurs, the airbag module may not deploy in the intended manner. The condition may result in the deployment of only one stage of the dual stage driver's airbag or the air bag may not deploy at all. No other SRS functionality is affected by this condition.

 <u>Service Program</u> – Dealers will be instructed to insert two 1mm spacers between the lower left hand side of the column switch mounting point and the column lock to improve the alignment of the column switch. Two foam pads will also be fitted to the top of the steering column switchgear to provide assured clearance between the cowl and the clockspring face. Dealers will also be instructed to inspect the clockspring drive peg sleeve and, if necessary, replace it with the current ribbed design.

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

Sincerely,

R.A. Mein

James P. Vondale

Attachment

<u>49 CFR Part 573 - DEFECT INFORMATION REPORT</u> RECALL P045 – 2005 and 2006 Model Year Land Rover LR3 and Range Rover Sport 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 is being initiated voluntarily by Land Rover.

573.6 (c) (2) - Potentially Affected Vehicles

2005-2006 Model Year Land Rover LR3 and Range Rover Sport vehicles built at the Solihull (UK) Assembly Plant from November 01, 2004, through to December 23, 2005, within VIN range SALLAAA545A309377 to SALAE25416A376425 for LR3 and VIN range SALSF25456A900290 to SALSF25426A939919 for Range Rover Sport are potentially affected.

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

23,617 LR3 vehicles and 13,525 Range Rover Sport 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 wiring that connects the steering column rotary coupler (clockspring) to the driver's air bag module may fracture as a result of relative motion between the clockspring and the steering wheel hub.

This relative motion may be caused by internal friction within the clockspring assembly and/or friction caused by contact of the steering column cowl against the clockspring. Clockspring friction can be caused by distortion of the steering column switch mounting platform as a consequence of mis-alignment of a location point on the steering column assembly due to potential contact of the steering column lock mechanism with the cowl during installation.

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

In the second quarter of 2005, Land Rover chassis engineering investigated reports of a quality concern regarding 'noise' being generated by the clockspring. As a result of the investigation, a ribbed sleeve was introduced onto the drive peg of the clockspring.

During the summer of 2006 reports of illumination of the SRS warning light were identified that could have been related to the clockspring wiring.

A number of potential contributing factors were evaluated and considerable testing was conducted to try and understand the issues related to the SRS warning light illumination.

This included an extensive evaluation of the components that could contribute to this issue (both new and components obtained from the field) and several test programs, conducted in conjunction with the various suppliers involved, to establish the failure mechanisms and their root cause.

At the Land Rover FRC in May, 2008, Land Rover decided to voluntarily recall the vehicles to provide additional clearance for the clockspring to protect the wiring from fracture.

Land Rover is not aware of any customer reports of accidents or injuries attributed to this condition.

573.6 (c) (8) Service Program

Owners will be notified and instructed to take their vehicles to a Land Rover dealer to have two 1mm spacers inserted between the lower left hand side of the column switch mounting point and the column lock to improve the alignment of the column switch. Two foam pads will also be fitted to the top of the steering column switchgear to provide assured clearance between the cowl and the clockspring face. Dealers will also be instructed to inspect the clockspring drive peg sleeve and, if necessary, replace it with the current ribbed design. There will be no charge to owners for this service.

Mailing of owner notification letters will occur during the week of July 21, 2008. Notification to dealers will occur on June 4, 2008.

Reimbursement will be provided to owners who have already paid for this repair as follows:

If the owner meets all the following requirements, they are eligible to receive reimbursement

- 1. They own or have owned a 2005 or 2006 MY LR3 or a 2006 MY Range Rover Sport within the VIN range listed above.
- 2. They have paid for a clockspring replacement due to the defect outlined previously in this letter.
- 3. The repair was performed before August 8, 2008
- 4. They have an original or legible copy of the paid repair order or invoice showing:
 - A description of the concern reported
 - Itemized parts and labor charges
 - The vehicle model and year and the vehicle identification number
 - The repair date
 - Repair mileage
 - Name and address of the Land Rover Retailer or licensed repair shop
 - The owner's name and address at the time of the repair

If they have all of the above information, they will be instructed to present it to the Service Manager at your authorized Land Rover Retailer and the dealer will arrange reimbursement of your claim.

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) (11) -- Recall Number

Land Rover has assigned recall number P045 to this action.