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April 6, 2009

Mr. Daniel C. Smith Associate Administrator for Safety Assurance National Highway Traffic Safety Administration 1200 New Jersey Avenue, SE/W45-231 Washington, DC 20590

Dear Mr. Smith:

Subject: Ford Motor Company (Ford) Recall No. 09S08 - Certain 2009 Model Year Ford Econoline E-350 and E-450 cutaway school bus prep package vehicles for reposition of the upper fuel tank protection bracket.

#### Summary

- Ford Action Ford is conducting a voluntary safety recall involving certain 2009 model year
   Ford Econoline E-350 and E-450 cutaway school bus prep package vehicles to reposition the upper fuel tank protection bracket on the frame rail.
- <u>Number of Vehicles Involved</u> Approximately 429 vehicles in the United States and federalized territories.
- Effect on Vehicle Operation The upper fuel tank protection bracket was not assembled in the intended position on the frame rail for these vehicles. The unintended position of the upper fuel tank protection bracket may allow the frame-edge to contact the fuel tank during a crash. This condition was identified in a post-crash review of a future model E-350 school bus. The vehicle met all crash requirements; however, Ford has not fully evaluated the performance of a vehicle with this condition for all attributes. In an abundance of caution, Ford will relocate the upper fuel tank protection bracket to the intended location. Ford is not aware of any reports related to this condition on vehicles in service.
- <u>Service Procedure</u> Owners will be notified and instructed to take their vehicles to a Ford or Lincoln/Mercury dealer to have the upper fuel tank protection bracket repositioned.

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

# 49 CFR Part 573 -- DEFECT INFORMATION REPORT 09S08 - 2009 MODEL YEAR FORD ECONOLINE E-350 AND E-450 CUTAWAY VEHICLES WITH SCHOOL BUS PREP PACKAGE - UPPER FUEL TANK PROTECTION BRACKET

Pursuant to Part 573 of Title 49 of the Code of Federal Regulations, Defect and Non-compliance Reports, Ford Motor Company submits the following information concerning a safety recall action that it is voluntarily initiating.

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

Vehicles potentially affected are certain 2009 model year Ford Econoline E-350 and E-450 cutaway school bus prep package vehicles built at the Ohio Assembly Plant (OHAP) from April 22, 2008 through March 2, 2009.

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 (1-866-436-7332) 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 429 vehicles in the United States and federalized territories.

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

100%

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

The upper fuel tank protection bracket was not assembled in the intended position on the frame rail for these vehicles. The unintended position of the upper fuel tank protection bracket may allow the frame-edge to contact the fuel tank during a crash. This condition was identified in a post-crash review of a future model E-350 school bus. The vehicle met all crash requirements, however; Ford has not fully evaluated the performance of a vehicle with this condition for all attributes. In an abundance of caution, Ford will relocate the upper fuel tank protection bracket to the intended location. Ford is not aware of any reports related to this condition on vehicles in service.

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

On March 6, 2009 chassis and crash engineering completed a review and analysis of a future model year prototype E-350 school bus that had been tested to the corporate School Bus Fuel System Integrity test. The crash test met all the crash requirements. However, it was determined that the upper fuel tank protection bracket was not in the intended position and had allowed the frame edge to contact the fuel tank. A review of the 2009 fuel system testing was conducted and determined that with the bracket in the intended position, the frame edge does not contact the tank. A review of vehicle design data indicated that the unintended position was likely present on 2009 model year production vehicles. On March 12, 2009 Ford's Critical Concern Review Group (CCRG) was notified. On March 19, 2009, the Technical Review Committee reviewed the item. On March 30, 2009, the Field Review Committee approved a field action.

## 573.6 (c) (8) - Service Program

Owners will be notified and instructed to take their vehicles to a Ford or Lincoln/Mercury dealer to have the upper fuel tank protection bracket repositioned. There will be no charge to owners for this service.

Mailing of owner notification letters will occur on April 14, 2009. Notification to Dealers will occur on April 6, 2009.

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.

## 573.6 (c) (10) - Press statement and Dealer/Owner Letters

Ford does not 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 09S08 to this action.