

James P. Vondale. Director Automotive Safety Office Environmental & Safety Engineering June 16, 2009 Fairlane Plaza South 330 Town Center Drive Dearborn, MI 48126-2738 USA

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

Dear Mr. Smith:

Subject: Ford Motor Company (Ford) Recall No. 09C08 - Certain 2008 Model Year Ford Econoline E-350 and certain 2009 Model Year Econoline E-350 and E-450 cutaway vehicles with school bus prep packages.

Summary

- Ford Action Ford is conducting a voluntary compliance recall involving certain 2008 model
 year Ford Econoline E-350 and certain 2009 model year Econoline E-350 and E-450 cutaway
 vehicles with school bus prep packages to inspect and, if missing, install fuel tank guard
 brackets.
- <u>Number of Vehicles Involved</u> Approximately 65 vehicles in the United States and federalized territories.
- Description of Non-Compliance Econoline cutaway vehicles ordered with the school bus prep package may not have received certain frame rail fuel tank guard brackets; depending on the model year up to three brackets may not have been installed. The missing brackets are intended to prevent frame edge to fuel tank contact during a crash. Compliance with FMVSS 301 Section S6.5 has not been evaluated for vehicles with this condition; Ford will inspect and install the fuel tank guard brackets, as specified, in an abundance of caution. As of June 10, 2009, there are no known accidents or injuries attributed to this condition.
- <u>Service Program</u> Ford notified dealers on June 16, 2009 to stop demonstrating or delivering
 the affected vehicles until they are inspected and repaired, as appropriate. Owners will be
 notified and instructed to take their vehicles to a Ford or Lincoln/Mercury dealer to have their
 vehicles inspected and, if missing, have the brackets installed.

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

Attachments

- 2 - Attachment 1

49 CFR Part 573 - NON-COMPLIANCE INFORMATION REPORT 09C08 - 2008 MODEL YEAR FOR ECONOLINE E-350 AND 2009 MODEL YEAR FORD ECONOLINE E-350 AND E-450 CUTAWAY VEHICLES WITH SCHOOL BUS PREP PACKAGE FUEL TANK GUARD BRACKETS

Pursuant to Part 573 of Title 49 of the Code of Federal Regulations, Defect and Non-compliance Reports, Ford Motor Company (Ford) submits the following information concerning a potential non-compliance to the requirements of Section S6.5 of FMVSS 301 for certain 2008 model year Ford Econoline E-350 and certain 2009 model year Econoline E-350 and E-450E cutaway vehicles with school bus prep packages.

573.6 (c) (2) - Potentially Affected Vehicles

Vehicles potentially affected are certain 2008 model year Ford Econoline E-350 and certain 2009 model year Ford Econoline E-350 and E-450 cutaway vehicles with school bus prep packages built at the Ohio Assembly Plant (OHAP) from April 29, 2008, through January 20, 2009.

Although Ford vehicles are not produced in VIN order, and we typically cannot provide VIN specific information, in this instance Ford is able to provide the specific VIN list – see Attachment II.

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

Approximately 65 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 Non-Compliance

Econoline cutaway vehicles ordered with the school bus prep package may not have received certain frame rail fuel tank guard brackets; depending on the model year up to three brackets may not have been installed. The missing brackets are intended to prevent frame edge to fuel tank contact during a crash. Compliance with FMVSS 301 Section S6.5 has not been evaluated for vehicles with this condition; Ford will inspect and install the fuel tank guard brackets, in an abundance of caution, as specified. As of June 10, 2009, there are no known accidents or injuries attributed to this condition.

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

In late April 2009, Ford was notified by a U.S. dealer of a missing frame rail fuel tank guard bracket, which was identified during service of a school prep cutaway chassis for field service action 09S08. Shortly thereafter, an upfitter in the U.S. notified Ford that they had identified 31 vehicles that were missing these frame rail brackets. Ford sent an inspection team to the upfitter to investigate the vehicles. The team confirmed that the brackets had not been originally installed and the 31 vehicles were corrected at the upfitter. Ford then conducted a review of production records at the Ohio Assembly Plant to determine if additional vehicles were built without the brackets. Ford concluded that it could not verify proper assembly for 65 U.S. vehicles, including the 34 vehicles identified and corrected in the U.S. during the investigation leading to this action.

Ford notified dealers on June 16, 2009, to stop demonstrating or delivering the affected vehicles until vehicle are inspected and repaired as appropriate. Owners will be notified and instructed to take their vehicles to a Ford or Lincoln/Mercury dealer to have their vehicles inspected and, if missing, have the brackets installed. There will be no charge to owners for this service.

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Mailing of owner notification letters will occur on June 26, 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 for customers.

573.6 (c) (10) - 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) (11) - Recall Number

Ford has assigned recall number 09C08 to this action.