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April 16, 2010

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

Dear Mr. Smith:

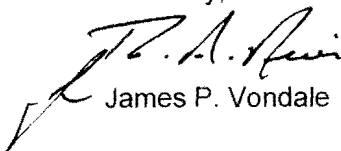
Subject: Ford Motor Company (Ford) Recall No. 10C11 - Certain 2010 Model Year Ford Fusion, Explorer, Explorer Sport Trac, and Mercury Milan and Mountaineer Vehicles – Front Driver and Passenger Seats with Manual Recliners

Summary

- Ford Action - Ford is conducting a voluntary compliance recall involving certain 2010 model year Ford Fusion, Explorer, Explorer Sport Trac, and Mercury Milan and Mountaineer vehicles to replace the front driver and passenger seat manual recliner mechanisms.
- Number of Vehicles Involved - Approximately 33,256 vehicles in the United States and federalized territories.
- Description of Non-Compliance - Ford's seat supplier shipped front driver and passenger seats with manual recliner mechanisms that may have recliner gear plate teeth out of dimensional specification, which could result in limited pawl to gear plate tooth engagement. Some affected seats with a manual recliner mechanism that is out of specification may not fully comply with the requirements of Section S.4.2.7 a & b of FMVSS 202a, Backset Retention, Displacement and Strength. As of April 14, 2010, there are no known reports of accidents or injuries related to this condition.
- Service Program - Dealers will be notified to stop demonstrating or delivering the affected vehicles until vehicles are repaired. Ford will notify owners and instruct them to take their vehicle to a Ford or Lincoln/Mercury dealer to have the front driver and/or front passenger seat recliner mechanisms replaced.

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

Attachment



49 CFR PART 573 - NON-COMPLIANCE INFORMATION REPORT  
10C11 - 2010 MODEL YEAR FORD FUSION, EXPLORER, AND EXPLORER SPORT TRAC  
AND MERCURY MILAN AND MOUNTAINEER VEHICLES WITH MANUAL  
FRONT DRIVER AND PASSENGER SEAT RECLINER MECHANISMS

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 S.4.2.7 a & b of FMVSS 202a, for certain 2010 model year Ford Fusion, Explorer, Explorer Sport Trac, and Mercury Milan and Mountaineer vehicles.

573.6 (c) (2) - Potentially Affected Vehicles

Certain 2010 Fusion, Milan models built from December 11, 2009 through February 3, 2010 at the Hermosillo Assembly Plant and certain 2010 Explorer, Mountaineer and Explorer Sport Trac models built from December 15, 2009 through February 3, 2010 at the Louisville 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 (1-866-436-7332) 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.

The seat assemblies for the affected vehicles are assembled by Lear Seating at their facilities in Mexico and the United States.

The Lear contact person is:

Director of Quality  
Jeff Hill  
(248-447-1374, cell 248-943-7059)

Lear Corporation  
21557 Telegraph Rd.  
Southfield, MI 48034

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

Approximately 33,256 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

Ford's seat supplier shipped front driver and passenger seats with manual recliner mechanisms that may have recliner gear plate teeth out of dimensional specification, which could result in limited pawl to gear plate tooth engagement. Some affected seats with a manual recliner mechanism that is out of specification may not fully comply with the requirements of Section S.4.2.7 a & b of FMVSS 202a, Backset Retention, Displacement and Strength. As of April 14, 2010 there are no known reports of accidents or injuries related to this condition.

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

On January 28, 2010, at the Ford Louisville assembly plant, an Explorer driver reported that the seat back moved slightly rearward when the driver pressed the seat back rearward with his body. An investigation into this vehicle was conducted and it was determined the recliner mechanism would allow movement. A further investigation was conducted that included review of warranty reports, inspection of vehicles in the field, supplier process reports, dimensional analysis of seat component parts, and supplier equipment capability to determine cause. It was determined that gear plate teeth in the manual recliner mechanism were out of dimensional specification on some gear plates. Additional reviews of manufacturing records within the supply chain found that a sub-supplier to the seat supplier had not maintained adequate dimensional controls when stamping certain gear plate teeth. On April 6, 2010, a FMVSS 202a compliance test was conducted with a manual recliner mechanism that had out of specification gear plate teeth. On Friday, April 9, 2010, an ad hoc Field Review Committee determined that seats with manual recliner mechanisms with gear plate teeth out of dimensional specification did not meet the performance requirements of Section S.4.2.7 a & b of FMVSS 202a and approved a field action.

573.6 (c) (8) - Service Program

Dealers will be notified to stop demonstrating or delivering the affected vehicles until vehicles are repaired. Ford will notify owners and instruct them to take their vehicle to a Ford or Lincoln/Mercury dealer to have the front driver and/or front passenger seat recliner mechanisms replaced.

Mailing of owner notification letters will begin on April 30, 2010 and will be completed on May 28, 2010. Notification to Dealers will occur on April 19, 2010.

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 at this time 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 10C11 to this action.