U.S. Department
of Transportation
**National Highway
Traffic Safety
Administration**

OCT 01 2012

1200 New Jersey Avenue SE
Washington, DC 20590

Via USPS Certified Mail and Email
Mr. David Sabet
Director, Applications Engineering
Stabilus
36225 Mound Road
Sterling Heights, MI 48310

NVS-215aa
EQ12-010
12V-062
10V-055
08V-244
06V-069

Re: Multiple Safety Recalls Involving Stabilus Gas-Filled Struts

Dear Mr. Sabet:

The Office of Defects Investigation (ODI), Recall Management Division (RMD) is conducting an equipment query (EQ) investigation in relation to certain gas-filled struts that multiple vehicle manufacturers have decided contain a safety related defect that could lead to personal injury. This investigation has been assigned the identification EQ12-010.

On February 16, 2012, American Honda Motor Company (Honda) notified the NHTSA that it had decided a defect exists in certain model year 2008 through 2009 Odyssey vehicles. Gas-filled struts that help to raise and support the liftgate of vehicles equipped with a power liftgate system may be prone to early life failures due to a manufacturing flaw. The flaw can result in a leak of the pressurized gas, leading to reduced strut performance. Struts with diminished performance can lead to unexpected closure, increasing the risk of personal injury. Stabilus was identified as the manufacturer of these gas-filled struts. This matter was assigned recall number 12V-062.

In reviewing past records, RMD discovered similar recalls conducted by Toyota, Ford, and Honda between 2006 and 2010. On February 18, 2010, Honda notified the NHTSA of the same rear liftgate gas strut issue in its 2005 Odyssey vehicles. This issue was given recall number 10V-055. On May 30, 2008, Toyota Motor Corporation (Toyota) notified the NHTSA of the same issue found in its 2004 through 2006 Sienna vehicles. This issue was given recall number 08V-244. On March 6, 2006, Ford Motor Company (Ford) notified the NHTSA of the same issue found in its 2005 through 2006 Freestar and Mercury Monterey vehicles. This issue was given recall number 06V-069. These three recalls did not originally identify the supplier of the gas struts; however, all three manufacturers have since confirmed that Stabilus supplied the equipment at issue in each recall. A copy of each respective recall notification is enclosed for your information.

The purpose of this request is to obtain a list of purchasers that were sold these gas-filled struts so they are made aware of this safety issue and are able to determine the need for any similar safety recall. It is also to request Stabilus provide the requisite defect report should it agree that it sold or distributed defective motor vehicle equipment to vehicle manufacturers. It is further to ascertain whether Stabilus manufactured and sold or distributed any defective

equipment in the replacement market for which it may have responsibility for filing a report with NHTSA and conducting a recall campaign. Accordingly, we require the following information:

1. Provide a list of all customers that received the same or similarly affected Stabilus gas-filled struts and provide their company name, line of business (i.e. vehicle manufacturer, equipment manufacturer, distributor, etc.), address, phone number, contact person, quantity sold to each, and sale date.

2. State whether Stabilus manufactured and sold or distributed any equipment containing the defect involved in the aforementioned recalls reports in the replacement market and, if so, provide a list of all customers that received the same or similarly affected Stabilus gas-filled struts and provide their company name, line of business (i.e. vehicle manufacturer, equipment manufacturer, distributor, etc.), address, phone number, contact person, quantity sold to each, and sale date.

Pursuant to Federal law, a manufacturer of motor vehicle equipment must notify NHTSA, within five (5) business days, when they first learn a safety defect or a noncompliance with a FMVSS exists in that equipment. In the case of a defect or noncompliance in original equipment installed in the vehicles of more than one manufacturer, notification to NHTSA must be made by the original equipment manufacturer as to the equipment item, and by each vehicle manufacturer as to those vehicles it manufactured in which the defective equipment was installed. The content of that notification is specified in 49 U.S.C. 573.6, Defect and Noncompliance Information Report.

If your company does not agree with Honda, Ford, and Toyota that these gas-filled struts contain a safety related defect, you must submit a written response explaining your decision including all supporting documents, analysis, and/or test reports.

This letter is being sent to your company pursuant to 49 U.S.C. § 30166, which authorizes NHTSA to conduct any investigation that may be necessary to enforce Chapter 301 of Title 49. Your company's failure to respond promptly and fully to this letter could subject your company to civil penalties pursuant to 49 U.S.C. § 30165 or lead to an action for injunctive relief pursuant to 49 U.S.C. § 30163.

If your company claims that any of the information or documents provided in response to this information request constitute confidential commercial material within the meaning of 5 U.S.C. § 552(b)(4), or are protected from disclosure pursuant to 18 U.S.C. § 1905, your company must submit supporting information together with the materials that are the subject of the confidentiality request, in accordance with 49 CFR Part 512, as amended (69 Fed. Reg. 21409 et seq; April 21, 2004), to the Office of Chief Counsel (NCC-111), National Highway Traffic Safety Administration, Room W41-227, 1200 New Jersey Avenue, S.E., Washington, D.C. 20590. Your company is required to submit two copies of the documents containing allegedly confidential information (except only one copy of blueprints) and one copy of the documents from which information claimed to be confidential has been deleted. Please remember that the word "CONFIDENTIAL" must appear at the top of each page containing information claimed to be confidential, and the information must be clearly identified in accordance with 5 U.S.C. § 512.6.

Your company's written response must be submitted to this office within 10 days of receiving this letter. In your response, please be certain to include a reference to this matter's identification number which is EQ12-010.

If you have any questions concerning this matter, please contact Alex Ansley of my staff at (202) 493-0481 or by e-mail at alexander.ansley@dot.gov. Response submissions may be made by US Mail, fax (202) 366-7882, or e-mail rmd.odi@dot.gov.

Sincerely,

Jennifer Timian
Chief, Recall Management Division
Office of Defects Investigation
Enforcement

Enclosures

RECEIVED
By Recall Management Division at 2:06 pm, Feb 17, 2012

HONDA

American Honda Motor Co., Inc.
1919 Torrance Boulevard
Torrance, CA 90501-2746
Phone (310) 783-2000

February 16, 2012

12V-062
(3 Pages)

Ms. Nancy Lewis
Associate Administrator for Enforcement
NATIONAL HIGHWAY TRAFFIC SAFETY
ADMINISTRATION
Attn: Recall Management Division (NVS-215)
1200 New Jersey Avenue, SE
Washington, DC 20590

Re: Recall Notification
2008 - early 2009 Model Year Honda Odyssey EX-L and Touring models
Power Liftgate Gas Struts

Dear Ms. Lewis:

On February 9, 2012, Honda Motor Co., Ltd. (HMC) determined that a potential defect relating to motor vehicle safety exists in the gas support struts of certain 2008 - early 2009 model year Honda Odyssey automobiles equipped with power liftgate systems, and is furnishing notification to the National Highway Traffic Safety Administration in accordance with 49 CFR Part 573 Defect and Noncompliance Reports.

573.6(c)(1)

Name of manufacturer: Honda Manufacturing of Alabama LLC (HMA)

Manufacturer's agent: Jay Joseph
American Honda Motor Co., Inc. (AHM)
1919 Torrance Blvd.
Torrance, CA 90501-2746

573.6(c)(2)

Identification of potentially affected vehicles:

Make/Model	Description	VIN Range/Dates of Manufacture
Honda Odyssey	Certain 2008 model year	5FNRL38988B000201 - 5FNRL38988B117034 Oct. 2, 2007 to Aug. 21, 2008
Honda Odyssey	Certain 2009 model year	5FNRL38789B000201 - 5FNRL38799B402812 Aug. 7, 2008 to Jan. 13, 2009

Description of the basis for the determination of the recall population:

The recall population was based on manufacturing records. The VIN range reflects all possible vehicles that could potentially experience the problem.

573.6(c)(2)(iv)

Identification of affected component:

Component:	Gas support struts (2x per vehicle)
Country of Origin:	United States
Manufacturer:	Stabilus
Contact Name	Susan Barker
Address:	36225 Mound Road Sterling Heights, MI 48310
Telephone No.:	(586) 446-3943

573.6(c)(3)

Total number of potentially affected vehicles: 45,747

573.6(c)(4)

Percentage of affected vehicles that contain the defect: Unknown

573.6(c)(5)

Defect description:

The gas-filled struts that help to raise and support the liftgate of vehicles equipped with a power liftgate system may be prone to early life failures due to a manufacturing flaw at the supplier. If this flaw is present, it can result in a leak of the pressurized gas, resulting in reduced strut performance. Struts with significantly diminished performance will result in the liftgate closing under its own power, possibly unexpectedly, with the potential risk of injury and inconvenience to users.

573.6(c)(6)

Chronology:

Sept. 23, 2011	AHM received a Preliminary Evaluation opening resume letter from NHTSA (PE11-034)
Sept. 30, 2011	AHM received a Preliminary Evaluation information request letter from NHTSA (PE11-034)
Nov. 22, 2011	AHM responded to PE11-034
Dec. 2011-Jan. 2012	HMA continues analysis of failure mechanism and supplier manufacturing records.
Feb. 2012	HMA concludes investigation, proposes market action
Feb. 9, 2012	HMC completed the investigation and determined that a safety-related defect exists.

573.6(c)(8)(i)

Program for remedying the defect:

The owners of all affected vehicles will be contacted by mail and asked to take their vehicle to a Honda automobile dealer. The dealer will replace both power liftgate gas struts, free of charge.

573.6(c)(8)(ii)

The estimated date to e-mail preliminary notification to dealers: Feb. 17, 2012

The estimated date to provide preliminary service bulletin to dealers: Feb. 17, 2012

The estimated date to begin sending notifications to owners: March 13, 2012

The estimated date of completion of the notification: March 20, 2012

573.6(c)(9)

Representative copies of all notices, bulletins and other communications:

A copy of the dealer service bulletin, the final customer notification letter and other dealer communication will be submitted to your office as soon as possible.

573.6(c)(10)

Proposed owner notification letter submission:

A draft of the owner notification letter will be submitted to your office as soon as possible.

573.6(c)(11)

Manufacturer's campaign number:

S22

Sincerely,

AMERICAN HONDA MOTOR CO., INC.

Jay Joseph
Senior Manager
Product Regulatory Office

JWJ:nis

HONDA

American Honda Motor Co., Inc.
1919 Torrance Boulevard
Torrance, CA 90501-2746
Phone (310) 783-2000

February 26, 2010

Mr. Daniel C. Smith
Associate Administrator for Enforcement
NATIONAL HIGHWAY TRAFFIC SAFETY
ADMINISTRATION
Attn: Recall Management Division (NVS-215)
1200 New Jersey Avenue, SE
Washington, DC 20590

Dear Mr. Smith:

Pursuant to conversations with Mr. Michael Lee of the NHTSA Office of Defect Investigation today, we have agreed to make certain changes to our letter of intent and customer letter regarding campaign 10V-055. This document supersedes our letter of February 18, 2010 for this matter.

Since NHTSA opened EA08-015 in August of 2008 Honda and members of your staff have been reviewing the performance of gas-filled liftgate struts on certain 2005 Honda Odyssey vehicles equipped with power liftgate systems. As Honda has reported to NHTSA, the liftgate struts on some of these vehicles may be prone to failure within an earlier than normal time frame. Through the course of these discussions, your staff and Honda have been unable to reach agreement on certain aspects of this matter, however Honda recognizes the inconvenience this can pose for our customers.

Though Honda does not agree with NHTSA that this constitutes a safety defect, Honda has decided to conduct a campaign to replace those struts that may fail prematurely and have not already been replaced under warranty, and to repay consumers who have replaced failed struts at their own expense. At this time we believe that most of the struts that have been replaced to date were replaced with struts of a subsequent design that are not expected to be subject to the same unexpected high rate of early life failure.

As agreed with your staff, this product update campaign is not being conducted under the Safety Act. We are submitting this letter in a format consistent with the requirements of Part 573 for the sake of simplified communication.

(1)

Name of manufacturer: Honda Manufacturing of Alabama LLC (HMA)

Manufacturer's agent: Jay Joseph
American Honda Motor Co., Inc. (AHM)
1919 Torrance Blvd.
Torrance, CA 90501-2746

(2)

Identification of potentially affected vehicles:

Make/Model	Description	VIN Range/Dates of Manufacture
Honda Odyssey Touring model	Certain 2005 model year	5FNRL38865B000152 - 5FNRL38845B127045 June 22, 2004 – July 15, 2005

Description of the basis for the determination of the product update population:
The campaign population was based on manufacturing records and market occurrence of the involved symptom. The VIN range reflects all possible vehicles that could potentially experience the problem.

(3)

Total number of potentially affected vehicles: 21,776

(4)

Percentage of affected vehicles that contain the problem: Unknown

(5)

Problem description:

The gas-filled struts that help to raise and support the liftgate of vehicles equipped with a power liftgate system may be prone to early life failures due to a manufacturing flaw at the supplier. If this flaw is present, it can result in a pressurized gas leak and reduce strut performance. Struts with diminished performance will result in the liftgate closing under its own power, possibly unexpectedly, with potential risk of injury and inconvenience to users.

(6)

Chronology:

April 10, 2008	Honda received opening resume for PE08-026 and cooperated with NHTSA's inquiry.
August 8, 2008	Honda received EA08-015 notification and cooperated with NHTSA's continued analysis efforts.
January, 2010	Honda met with NHTSA staff and subsequently agreed to conduct a product update campaign

(7)

Quarterly Reports:
Honda will submit six consecutive quarterly reports in accordance with the requirements of 49 CFR Part 573.7

(8)(i)

Program for remedying the problem:
The owners of all affected vehicles will be contacted by mail and asked to take their vehicle to a Honda automobile dealer. The dealer will inspect the lot number of the gas struts. If lot number indicates that the struts are within the range of affected components they will be replaced at no charge to the consumer.

(8)(ii)

The estimated date to e-mail preliminary notification to dealers:	March, 2010
The estimated date to provide service bulletin to dealers:	March, 2010
The estimated date to begin sending notifications to owners:	March, 2010
The estimated date of completion of the notification:	March, 2010

(9)

Representative copies of all notices, bulletins and other communications:
A copy of the dealer service bulletin and text of the final customer notification letter will be submitted to your office as soon as possible.

(10)

Proposed owner notification letter submission:
A draft of the owner notification letter will be submitted to your office as soon as possible.

(11)

Manufacturer's campaign number:
R29

Sincerely,

AMERICAN HONDA MOTOR CO., INC.

Jay Joseph
Senior Manager
Product Regulatory Office

JWJ:nis

TOYOTA

TOYOTA MOTOR NORTH AMERICA, INC.

WASHINGTON OFFICE

601 THIRTEENTH STREET, NW, SUITE 910 SOUTH, WASHINGTON, DC 20005

TEL: (202) 775-1700

FAX: (202) 463-8513

May 30, 2008

Mr. Daniel C. Smith
Associate Administrator for Enforcement
National Highway Traffic Safety Administration
1200 New Jersey Avenue, S.E.
Washington, D.C. 20590

08V-244
(6 pages)

RE: Toyota Siennas with Power Liftgates
NHTSA EA06-020

Dear Mr. Smith:

For some time, our staffs have been engaged in discussions about the performance of the power liftgate in certain Sienna vehicles when the liftgate struts can no longer sustain the weight of the liftgate due to leakage of gas from the struts. This condition has been the subject of NHTSA Investigation EA06-020. Because this condition can lead to customer dissatisfaction, Toyota has been addressing this issue through an extended warranty program to cover the costs of strut replacement within the first six years of ownership. Your staff has advised Toyota that the extended warranty program does not address all of the issues encompassed by EA06-020. For example, the warranty extension notification does not identify the condition as a safety concern, nor does it offer to replace the vehicles' struts prior to the onset of the condition.

In order to address the concerns of your staff, and to avoid a protracted dispute about this issue, Toyota has decided to conduct a campaign to offer to provide free replacement gas struts to all owners of affected vehicles. The replacement gas struts have an improved design, and are expected to have a longer service life than the original struts.

Although Toyota is willing to identify this campaign as a safety recall in the owner communication about the campaign, Toyota has not determined that the condition described above is a "safety-related defect" within the meaning of the federal vehicle safety laws. Toyota has previously communicated its reasons for declining to identify the strut deterioration as a "safety-related defect," and need not repeat those reasons here. Nevertheless, Toyota will voluntarily notify its customers of this campaign and will voluntarily cooperate with NHTSA's recall procedures by providing six quarterly reports of campaign completion and providing reimbursement to eligible owners who paid for strut repairs prior to this campaign.

RECEIVED

2008 JUNE -3 A 10:35

DEFECTS INVESTIGATION
RECALL MGMT DIV.

Toyota understands that NHTSA will assign a recall number to this campaign, as if it were a campaign conducted under the Safety Act, and will post the information about the campaign on the NHTSA/ODI website. Toyota also understands that the summary of the campaign on the NHTSA/ODI website will contain a notation that Toyota has not made a decision that these vehicles contain a safety-related defect.

A draft owner notification letter is enclosed with this letter, along with following information, as specified in Part 573 of your regulations:

1. **Manufacturer's name/address:**

Toyota Motor Manufacturing Indiana, Inc. ["TMMI"]
4000 Tulip Tree Drive,
Princeton, IN 47670-4000

Affiliated U.S. Sales Company

Toyota Motor Sales, USA, Inc. ["TMS"]
19001 South Western Avenue
Torrance, CA 90509

2. **Vehicles involved in this notification:**

Based on production records, we have determined the affected vehicle population to be the population described in the table below:

Make/ Car Line	Model Year	Manufac-turer	VIN		Production Period
			VDS	VIS	
Toyota Sienna	2004 through 2006	TMMI	BA22C	4S000023 – 6S077052	January 10, 2003 through December 6, 2006
			ZA22C	4S000020 – 6S587358	
			ZA23C	4S016466 – 5S384289	

Please note that this information corrects information previously provided to NHTSA about the affected model years. Previously, Toyota indicated that some early Model Year 2007 Siennas may be included in the affected group of vehicles. This information was incorrect. Toyota has now confirmed that all Model Year 2007 Siennas were equipped with the newly designed struts; therefore, this campaign involves only Model Year 2004-2006 Siennas equipped with a power liftgate. In addition, although the involved vehicles are within the above VIN range, not all vehicles in this range were sold in the U.S.

Please also note that a portion of these vehicles have already been repaired under Technical Service Bulletin BO001-07 and Customer Support Program POL08-01 and general warranty service; however, as noted in the owner notification, some struts replaced under the original vehicle warranty coverage may need to be replaced under this campaign. Toyota is still in the process of determining the portion of the repaired population that may need to be replaced in this campaign.

3. Total number of vehicles:

As noted in item 2, above, Toyota is still in the process of determining the portion of the vehicle population that has already been repaired but that may need to be replaced in this campaign. There are 196,222 MY 2004-2006 Sienna vehicles equipped with power liftgates; however, not all of them will need to be included in the campaign.

4. Approximate percentage of vehicles estimated to actually contain the condition:

Toyota does not know the percentage of vehicles that might actually contain the condition; therefore, all Siennas equipped with power liftgates in Model Years 2004-2006 will be included in the campaign.

5. Description of the condition:

Toyota has determined that the gas struts used to help lift and support the power rear liftgate in some Sienna vehicles are wearing out sooner than expected. As the gas struts deteriorate, the performance of the power rear liftgate will begin to degrade, and the power rear liftgate will operate more slowly than when the gas struts were new.

If not repaired, the gas struts may not be able to support the weight of the liftgate when it is open. Eventually, the gas struts could deteriorate to the point that the liftgate will fall about ten inches after it reaches the fully open position, at which point the power motor will engage and power the liftgate to the fully closed position. This condition may cause injury to a person who is struck by the liftgate when it falls or when it is closing.

6. Chronological summary of events leading to this campaign:

On August 2, 2006, NHTSA opened Preliminary Evaluation (PE) 06-029. Toyota cooperated fully with NHTSA to investigate the issue.

On December 1, 2006, NHTSA opened Engineering Analysis (EA) 06-020. Toyota continued to cooperate with NHTSA to investigate the issue.

In May 2008, Toyota and NHTSA agreed that Toyota would conduct a campaign to resolve the issues raised in EA 06-020.

7. Description of campaign (including schedule for dealer and customer notification):

Toyota will notify owners of affected Sienna vehicles by first class mail to return their vehicles to any Toyota dealer for replacement of the gas struts at no charge. Toyota is still working on the schedule for notification and will advise NHTSA of the schedule under separate cover.

The owner letter will instruct vehicle owners that have paid to have their struts replaced for a similar condition prior to this campaign that they can obtain reimbursement by mailing a copy of their repair order, proof-of-payment, and proof-of-ownership to Toyota, subject to the following provisions:

i. Beginning date:

The reimbursement plan will cover repairs made as early as January 10, 2003, when the first vehicles were manufactured.

ii. Ending date:

The ending date shall be 10 calendar days after the date on which the last owner notification is mailed. However, Toyota will review later requests for reimbursement from on a case-by-case basis.

iii. Toyota may exclude reimbursement, if:

a. the pre-notification repair was not of the same type (repair, replacement, or refund of purchase price) as the campaign remedy;

b. the pre-notification repair was not reasonably necessary to correct the issue that led to the campaign; or

c. the repair was conducted as a result of a vehicle accident, debris or another reason not related to the issue identified in the campaign.

iv. Toyota will reimburse eligible customers for at least the cost of the struts and the replacement labor. Other costs may be reimbursed on a case-by-case basis.

v. Owners requesting reimbursement must submit the appropriate documentation: repair order, reason for replacement, proof-of-payment, and proof-of-ownership to Toyota for reimbursement consideration.

Toyota appreciates this opportunity to cooperate with NHTSA. Should you have any questions about this information, please contact Mr. Chris Santucci of my staff at (202) 775-1707.

Sincerely,

TOYOTA MOTOR NORTH AMERICA, INC.

Chris Tinto
Vice President
Technical & Regulatory Affairs

CT:cs
Enclosure

2004 through 2006 Model Year Sienna Equipped with Power Back Door Stays (Power Rear Liftgate Struts)

DRAFT

Safety Recall Campaign (TBD)

[VIN]

Dear Toyota Owner:

This notice is being sent to you in voluntary accordance with the requirements of the National Traffic and Motor Vehicle Safety Act. Toyota has decided to conduct a safety recall of certain 2004 through 2006 model year Sienna vehicles equipped with a Power Back Door (Power Rear Liftgate). At Toyota, we are dedicated to providing vehicles of outstanding quality and value. As part of our continual efforts to meet your product expectations, we are sending you this notice of a safety recall to provide for the replacement of the Power Rear Liftgate Struts (gas struts) with newly designed ones at no charge to you.

In January, Toyota announced a Warranty Enhancement to extend the warranty coverage of your Power Rear Liftgate Struts (please see the Warranty Enhancement Letter for details). In the meantime, Toyota has decided to conduct a safety recall for your Power Rear Liftgate Struts. This recall letter provides for replacement of liftgate struts regardless of their current condition. Note that some struts replaced under the original vehicle warranty coverage may need to be replaced under this recall.

What is the condition?

Toyota has determined that the gas struts used to help lift and support the Power Rear Liftgate in some Sienna vehicles could be wearing out sooner than expected. As the gas struts deteriorate, the performance of your Power Rear Liftgate will begin to degrade, and the Power Rear Liftgate will operate more slowly than when the gas struts were new. In the event that this condition has occurred in the Power Rear Liftgate Struts on your Toyota Sienna vehicle, you may notice that the Power Rear Liftgate will not remain in the open position.

If not repaired, the gas struts may not be able to support the weight of the liftgate when it is open, and eventually, the gas struts could deteriorate to the point that the liftgate will fall about ten inches after it reaches the fully open position, at which point the power motor will engage and power the liftgate to the fully closed position. This condition may cause injury to a person who is struck by the liftgate when it falls or when it is closing.

What will Toyota do?

To help reduce the likelihood of injury in the event the gas struts have deteriorated, Toyota will replace your gas struts at ***no charge*** to you with newly designed gas struts that have a longer service life.

What should you do?

Please contact any Toyota dealer and make an appointment to replace the Power Rear Liftgate Struts with the newly designed gas struts as soon as possible.

The actual repair will take approximately 1 hour. However, depending upon the dealer's work schedule, it may be necessary to make your vehicle available for a longer period of time. Please present this notice to the Toyota dealer when you bring the vehicle in for your appointment.

Even after you receive your replacement struts, you need to pay attention to the condition of your liftgate. Toyota is providing the following operational instructions and warnings for continued usage of the Rear Liftgate:

- Please be sure to wait at least an additional 2 seconds from the time the liftgate is in the fully opened position prior to standing under it.
- In the event your Power Liftgate Strut(s) performance has degraded, your liftgate will automatically close with an audible alarm and flashing of the hazard lamps. The Toyota Sienna Power Rear Liftgate is equipped with jam and pinch protection which also includes auto reversal of the Rear Liftgate. Please use your best judgment about the condition of your Rear Liftgate and obtain repairs promptly if the liftgate appears to show degradation.
- Refer to your Owner's Manual for additional operating instructions.

What if you have other questions?

Your local Toyota dealer will be more than happy to answer any of your questions and set up an appointment to perform this important Safety Campaign. If you require further assistance, you may contact the Toyota Customer Experience Center at 1-888-270-9371 Monday through Friday, 5:00 am to 6:00 pm, Saturday 7:00 am through 4:00 pm Pacific Time. If you are unable to obtain the repairs in a reasonable time, you may also file a complaint with the National Highway Traffic Safety Administration, 1200 New Jersey Avenue SE, Room W46-425, Washington, D.C. 20590 or call the toll-free Vehicle Safety Hotline at (888) 327-4236 (TTY (800) 424-9153).

What if you have previously paid for the replacement of the Power Rear Liftgate Struts for this specific condition as it applies to your affected 2004 through 2007 model year vehicle?
If you have previously paid for the replacement of the Power Rear Liftgate Strut(s) on your vehicle, please mail a copy of your repair order which includes the reason for replacement, proof-of-payment, and proof-of-ownership to the following address for reimbursement consideration:

Toyota Motor Sales, U.S.A., Inc.
Toyota Customer Experience, WC 10
19001 South Western Avenue
Torrance, CA 90509

Include your name, address, and telephone number(s) in your request. Please allow 4 to 6 weeks to process your request.

We have sent this notice in the interest of your continued satisfaction with our products.

Sincerely,
TOYOTA MOTOR SALES, U.S.A., INC.

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

Fairlane Plaza South
330 Town Center Drive
Dearborn, MI 48126-2738 USA

06V-069
3 pages

March 6, 2006

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

Dear Mr. Smith:

Subject: Ford Recall No. 06S42–2005 and Certain 2006 Model Year Ford Freestar and Mercury Monterey Vehicles–Power Liftgates

Summary

- Ford Action – Ford is conducting a voluntary safety recall involving 2005 and certain 2006 model year Ford Freestar and Mercury Monterey vehicles, equipped with a power liftgate, and built from April 13, 2004, through December 13, 2005. After being powered open, the power liftgate motor automatically disengages. In the event of a liftgate strut malfunction, the liftgate can fall freely with no prior warning.

- Number of Vehicles Involved – Approximately 12,728 vehicles in the United States and Federalized Territories.

- Affect on Vehicle Operation – At the completion of the power liftgate opening operation, the liftgate can fall with no prior warning.

- Service Procedure – Owners will be notified and instructed to take their vehicles to a Ford or Lincoln/Mercury dealer to have the Power Liftgate Control Module reprogrammed. The new program will sound an audible warning and control lowering of the liftgate to the closed position if the struts have inadequate strength to hold the liftgate open.

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 -- DEFECT INFORMATION REPORT 06S42 – 2005 AND CERTAIN 2006 MODEL YEAR FORD FREESTYLE AND MERCURY MONTEREY VEHICLES EQUIPPED WITH POWER REAR LIFTGATES BUILT FROM APRIL 13, 2004 THROUGH DECEMBER 13, 2005

Pursuant to Part 573 of Title 49 of the Code of Federal Regulations, Defect and Noncompliance 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 2005 and certain 2006 model year Ford Freestyle and Mercury Monterey vehicles, equipped with the power liftgate option, and built from April 13, 2004, through December 13, 2005.

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 (1-800-392-3673) 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 12,728 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

After being powered open, the power liftgate motor automatically disengages. In the event of a liftgate strut malfunction, the liftgate can fall freely with no prior warning.

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

In October 2005, engineering identified two reports involving two 2005 model year Freestar vehicles that alleged that the power liftgate unexpectedly fell closed immediately after reaching the full open position. During November and December 2005 engineering contacted several dealership technicians to gain additional information from incidents that may be related to this issue. Subsequently, in December 2005, liftgate struts from vehicles in service were examined and the motorized liftgate system operation was analyzed. In addition, manufacturing and vehicle assembly processes at the supplier and Oakville Assembly Complex were reviewed.

Ford has been able to identify 32 vehicles that may have exhibited this condition. Reports relating to five of these vehicles contain allegations that the liftgate fell on the customer. In three of these reports the customer reported that they received medical care as a result of the event.

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 Power Liftgate Control Module reprogrammed. The new program will sound an audible warning and control lowering of the liftgate to the closed position if the struts cannot hold the liftgate open.

There will be no charge to owners for this service. Mailing of owner notification letters will occur on March 13, 2006. Ford's general reimbursement plan for the cost of remedies paid for by vehicle owners prior to notification of a safety recall was provided to the agency on February 28, 2003.

573.6 (c) (9) -- 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 06S42 to this action.

573.13 (c) (2) - Ending Date for Reimbursement Eligibility

The ending date for reimbursement eligibility for cost of remedies paid for by vehicle owners per Ford's general reimbursement plan is March 23, 2006.