



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

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

January 26, 2011

Mr. Claude H. Harris  
Acting Associate Administrator for Enforcement  
National Highway Traffic Safety Administration  
1200 New Jersey Avenue SE, Room W45-231  
Washington, DC 20590

Dear Mr. Harris:

Subject: Ford Motor Company (Ford) Recall No. 11S16 – Certain 1999 through 2003 model year Ford Windstar vehicles for corrosion-related fractures at the front lower control arm rear attaching brackets and body mount attachments at the rear of the front subframe.

#### Summary

- Ford Action – Ford is conducting a voluntary safety recall in high corrosion areas involving certain 1999 through 2003 model year Ford Windstar vehicles to address corrosion-related fractures of the front lower control arm rear attaching brackets and body mount attachments at the rear of the front subframe.

While we have not concluded that the low rate of reported incidents on these older vehicles rises to the level of a safety defect, we are taking this action to confirm our commitment to safety and to address any potential vehicle owner concerns.

- Number of Vehicles Involved – Ford estimates that there are approximately 425,288 currently registered vehicles that were either originally sold in or are in Connecticut, Delaware, the District of Columbia, Illinois, Indiana, Iowa, Kentucky, Maine, Maryland, Massachusetts, Michigan, Minnesota, Missouri, New Hampshire, New Jersey, New York, Ohio, Pennsylvania, Rhode Island, Utah, Vermont, West Virginia, and Wisconsin.

Ford is including vehicles that were either originally sold in or are currently registered in Utah even though Ford has not received any reports of these corrosion-related fractures on vehicles in Utah. Ford is including vehicles in Utah solely to limit confusion among our dealers and vehicle owners in Utah that are included in the corrosion-related safety recall for the rear axle on these same Ford Windstar vehicles.

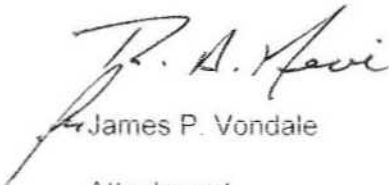
- Effect on Vehicle Operation – A separation of a front lower control arm rear attaching bracket may result in a lower control arm separation. A separation of both front subframe rear body mounts may result in separation of the steering intermediate shaft. Either condition could result in diminished vehicle directional control, increasing the risk of a crash.

- Service Procedure – Owners will be notified and instructed to take their vehicle to a Ford or Lincoln/Mercury dealer for an inspection of both front lower control arm rear attaching brackets and both body mount attachments at the rear of the front subframe. If the vehicle passes inspection, owners will be notified when to return for installation of reinforcement brackets to extend the front subframe durability in these areas in the presence of corrosion. Owners of vehicles that do not pass inspection, but can be repaired, will be offered alternative transportation until parts become available. In limited circumstances where reinforcement brackets cannot repair a vehicle, a repurchase offer will be extended.

Ford anticipates that parts will be available in limited quantities in early March.

Ford is voluntarily taking this action as a safety recall to address the agency's concerns and to respond to any potential vehicle owner concerns. Also, Ford is extending the free remedy offer to all vehicle owners in the corrosion areas, including those vehicles that are beyond the statutorily required free remedy period. The detailed information required by the applicable portions of 49 CFR Part 573 - Defect and Non-Compliance Information Report is attached.

Sincerely,



James P. Vondale

Attachment

49 CFR Part 573 -- DEFECT INFORMATION REPORT  
11S16 -- 1999 THROUGH 2003 MODEL YEAR FORD WINDSTAR VEHICLES --  
FRONT LOWER CONTROL ARM REAR ATTACHMENT BRACKETS AND BODY MOUNT  
ATTACHMENTS AT THE REAR OF THE FRONT SUBFRAME

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 1999 through 2003 model year Ford Windstar vehicles built at the Oakville Assembly Plant that are currently registered or originally sold in Connecticut, Delaware, the District of Columbia, Illinois, Indiana, Iowa, Kentucky, Maine, Maryland, Massachusetts, Michigan, Minnesota, Missouri, New Hampshire, New Jersey, New York, Ohio, Pennsylvania, Rhode Island, Utah, Vermont, West Virginia, and Wisconsin.

Ford is including vehicles that were either originally sold in or are currently registered in Utah even though Ford has not received any reports of fracture at the front lower control arm rear attaching bracket or body mount attachments at the rear of the front subframe on vehicles in Utah. Ford also undertook a limited survey of Windstar vehicles that are currently parked as part of the rear axle safety recall in Utah and did not find any vehicles with a front subframe that is exhibiting significant corrosion in the areas being addressed by this action. Ford is solely taking this action to limit confusion among our dealers and vehicle owners in Utah that are included in the corrosion-related safety recall for the rear axle on these same Ford Windstar vehicles.

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 dealer who can obtain specific information regarding the vehicles from the Ford On-line Automotive Service Information System (OASIS) database.

The front subframes were produced by Dana Holding Corporation. Dana Holding Corporation was subsequently purchased by Metalsa Structural Products, Inc.

Metalsa Structural Products, Inc.  
750 Black Branch Road  
Elizabethtown, KY 42701  
Contact Name: Eric Devary (270)769-7039

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

Approximately 425,288 currently registered vehicles that were either originally sold in or are registered in the high corrosion areas of the United States and Utah are potentially affected.

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

Unknown.

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

Ford notes that the vast majority of the reports (approximately 98%) received by Ford that allege corrosion-related separation of the front lower control arm rear attaching bracket are on vehicles that were originally sold or are currently registered in the high corrosion areas of the United



States. Further, all reports received by Ford that allege corrosion-related separation of the body mount attachments at the rear of the front subframe are on vehicles that were originally sold in or are currently registered in the high corrosion areas of the United States.

The supplier of the front subframe did not consistently complete the phosphating process prior to the electrodepositing corrosion protection (e-coat) application on the parts. An inconsistent phosphating process can lead to poor e-coat adhesion. Subframes that were not properly e-coated, and in the presence of corrosives such as road salt, may rust over time, resulting in reduced durability of the front lower control arm rear attaching brackets and body mount attachments at the rear of the front subframe.

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

On July 20, 2010, the National Highway Traffic Safety Administration (NHTSA) opened a preliminary evaluation (PE10-026) on 1999 through 2003 model year Ford Windstar vehicles for corrosion-related failures of the front subframe, including failures of the front lower control arm rear attachment bracket. NHTSA had received 87 complaints of corrosion-related failures of the front subframe. Ford has received a total of 74 unique incident reports as of December 15, 2010, that may relate to the subject of NHTSA's preliminary evaluation. On December 20, 2010, NHTSA upgraded its investigation to an engineering analysis (EA10-007). Although the EA investigation has not been completed, on January 21, 2011, Ford's Field Review Committee (FRC) reviewed the issue and approved a field action. While we have not concluded that the low rate of reported incidents on these older vehicles rises to the level of a safety defect, we are taking the action to confirm our commitment to safety and to address any potential vehicle owner concerns.

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

Owners of vehicles originally sold in or currently registered in the high corrosion areas and Utah will be notified and instructed to take their vehicles to a Ford or Lincoln/Mercury dealer for an inspection of the front lower control arm rear attaching brackets and body mount attachments at the rear of the front subframe. If the front lower control arm rear attaching brackets are not cracked, perforated, or exhibiting significant metal loss, and if the front subframe at the rear body mount locations are not cracked with metal separation aft of the rear body mount and if the front subframe is not cracked or perforated in the area between the rear body mount and the front lower control arm rear attaching bracket, the vehicle will be returned to its owner and the owner will be notified when to return for installation of the reinforcement brackets. Owners of vehicles that do not pass inspection, but can be repaired, will be offered alternative transportation until parts become available. In limited circumstances where reinforcement brackets cannot repair the vehicle, a repurchase offer will be extended. There will be no charge to owners for any of these services.

Ford anticipates that parts will be available in limited quantities in early March.

Mailing of owner notification letters is expected to begin the week of February 14, 2011. Initial notification to dealers will occur on January 26, 2011, with additional information being provided to dealers the week of January 31, 2011.

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, 2009.

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

National media attention is likely as with most Ford recalls when posted to NHTSA's safecar.gov website. Ford will provide public comments when requested. A news release will not be issued. 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 11S16 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 4, 2011.

###