



Automotive Safety Office
Environmental & Safety Engineering

August 22, 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: 2011 Model Year Ford E-150, E-250, E-350, and E-450 Air Bubbles in Windshield

Ford Motor Company has determined that the windshields on certain 2011 model year Ford E-150, E-250, E-350, and E-450 vehicles do not fully meet the requirements of FMVSS 205 S5.1.1 that cites ANSI Z26.1-1996 section 5.4. All other requirements of FMVSS 205 are met.

Approximately 100 of the 4,532 model year 2011 Ford E-150, E-250, E-350, and E-450 vehicles built from May 12, 2011, through May 25, 2011, at the Ohio Assembly Plant are affected. No other vehicles are affected by this condition.

Certain manufacturing conditions at the supplier may have allowed air particles to be trapped between the layers of glass. When the windshield is exposed to high temperatures, such as when the vehicle is parked in the sun with the windows closed in ambient temperatures greater than 80° F, bubbles may develop. Due to high seasonal temperatures when this concern occurred, it is expected that windshields with the potential for this condition would develop air bubbles at very low time-in-service, typically prior to delivery to the final customers. Out of 41 reports received of the 100 expected vehicles with the condition, only one has occurred subsequent to customer delivery.


There are no reports of air bubbles affecting the entire windshield. If bubbles occurred in the driver vision zone, they did not completely obscure it.

The appearance of the air bubbles is a slow process, most likely occurring when the vehicle is parked in the sun with the windows closed, and would be noticed by the customer who would seek repair under Ford's normal 3/36 warranty.

In our judgment, for the reasons noted above, the condition does not present any risk to motor vehicle safety. Therefore, Ford intends to petition the Administrator for exemption from the notification and remedy requirements of the Act on the basis that the condition is inconsequential as it relates to motor vehicle safety.

Attached is the detailed information required by the applicable portions of 49 CFR Part 573 – Defect and Non-Compliance Information Report.

Sincerely,



Steven M. Kenner
Attachment



49 CFR PART 573 – NON-COMPLIANCE INFORMATION REPORT
2011 MODEL YEAR FORD E-150, E-250, E-350, E-450 VEHICLES FMVSS 205

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 non-compliance to FMVSS 205 and Ford's intent to petition the Administrator for exemption from the notification and remedy requirements of the Act on the basis that the condition is inconsequential as it relates to motor vehicle safety.

573.6 (c) (2) - Potentially Affected Vehicles

2011 model year Ford E-150, E-250, E-350, and E-450 vehicles built from May 12, 2011, through May 26, 2011, at the Ohio Assembly Plant are affected.

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

Approximately 4,532 model year 2011 vehicles are potentially affected.

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

Potentially 2.3%.

573.6 (c) (5) - Description of the Non-Compliance

FMVSS 205 S5.1.1 specifies meeting the requirements of ANSI Z26.1-1996 Section 5.4 Boil Test which prohibits bubbles in the test specimen. The actual test was not performed but affected vehicles in service would not be expected to comply with these requirements.

573.6 (c) (7) - Basis for Non-Compliance

On May 23, 2011, at the Ohio Assembly Plant, a vehicle was discovered with a windshield that exhibited bubbles after sitting in the yard for three days. Other vehicles were found exhibiting bubbles in the yard. A stop ship was issued and all vehicles were inspected and repaired. An investigation was conducted and it was determined that some windshields were not manufactured correctly. A review of field data determined that vehicles had been shipped with the condition and were being repaired under Ford's 3/36 warranty. Ford conducted a review of FMVSS 205 and determined that some windshields may not fully meet the requirement of Section S5.1.1 that cites ANSI Z26.1-1996 section 5.4, Boil Test, which prohibits bubbles in the test area.

573.6 (c) (8) (iii) - Notification of intent to file a petition for exemption from notification and remedy requirements

A windshield with trapped air may develop air bubbles when it is exposed to high temperatures, such as when the vehicle is parked in the sun with the windows closed in ambient temperatures greater than 80° F. Due to high seasonal temperatures when this concern occurred, it is expected that windshields with the potential for this condition would develop air bubbles at very low time-in-service, typically prior to delivery to the final customers. Out of 41 reports received of the 100 expected vehicles with the condition, only one has occurred subsequent to customer delivery.

There are no reports of air bubbles affecting the entire windshield. If bubbles occurred in the driver vision zone, they do not completely obscure it.

The appearance of the air bubbles is a slow process, most likely occurring when the vehicle is parked in the sun with the windows closed, and would be noticed by the customer, who would seek repair under Ford's normal 3/36 warranty.

In our judgment, for the reasons noted above, the condition does not present a risk to motor vehicle safety. Therefore, Ford intends to petition the Administrator for exemption from the notification and remedy requirements of the Act on the basis that the condition is inconsequential as it relates to motor vehicle safety.

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

Ford does not at this time plan to make a statement to the media concerning the subject matter of this compliance action, nor do we plan to submit any notification letters to owners or dealers.

573.6 (c) (11) - Recall Number

Because a campaign is not planned at this time, Ford has not assigned a campaign number to this action.