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330 Town Center Drive



Steve M. Kenner, Global Director Automotive Safety Office Sustainability, Environment & Safety Engineering

December 5, 2011

Ms. Nancy Lewis Associate Administrator for Enforcement National Highway Traffic Safety Administration 1200 New Jersey Avenue SE, Room W45-306 Washington, DC 20590

Dear Ms. Lewis:

Subject: Ford Motor Company (Ford) Recall No. 11C21 - Certain 2011 Model Year F-150 and Certain 2012 Model Year F-250, F-350, F-450, and F-550 Trucks with Steering Column Mounted Transmission Shifter Lever for Brake Transmission Shift Interlock Switch Function

### Summary

- Ford Action Ford is conducting a voluntary compliance recall involving certain 2011 model year F-150 and certain 2012 model year F-250, F-350, F-350, F-450, and F-550 trucks with a steering column mounted shift lever to inspect, test, and if necessary, replace the Brake Transmission Shift Interlock (BTSI) switch.
- <u>Number of Vehicles Involved</u> Approximately 16,091 vehicles in the United States and federalized territories are potentially affected.
- Description of Non-Compliance Ford's steering column supplier shipped steering columns with a component in the Brake Transmission Shift Interlock (BTSI) switch that may have been contaminated. This contamination can cause the plunger shaft in the BTSI switch to bind, thereby inhibiting proper switch function. On affected vehicles, the vehicle can be shifted out of "park" without depressing the brake pedal and would not comply with FMVSS 114 Section S5.3 which requires a vehicle equipped with an automatic transmission that includes a "park" position to be equipped with a system that requires the service brake to be depressed before the transmission can be shifted out of "park." Some of the vehicles have a gross vehicle weight rating greater than 10,000 pounds and are not subject to FMVSS 114. Although these vehicles are not required to meet the requirements, in this instance, Ford has decided to include the vehicles in this action in the interest of safety. As of November 29, 2011, Ford is not aware of any accidents or injuries related to this condition.
- <u>Service Program</u> Ford notified dealers on December 6, 2011, to stop demonstrating or delivering
  the affected vehicles until inspections are performed and switches replaced, if necessary. Ford will
  notify owners and instruct them to take their vehicles to a Ford or Lincoln dealer to inspect, test,
  and if necessary, replace the BTSI switch.

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

Sincerely.

Steven M. Kenner Attachment

R. A. Navi



# 49 CFR PART 573 - NON-COMPLIANCE INFORMATION REPORT 11C21- CERAIN 2011 MODEL YEAR F-150 AND CERTAIN 2012 MODEL YEAR F-250, F-350, F-450, AND F-550 TRUCKS WITH STEERING COLUMN MOUNTED TRANSMISSION SHIFTER LEVER FOR BRAKE TRANSMISSION SHIFT INTERLOCK SWITCH FUNCTION

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 S5.3 of FMVSS 114 for certain 2011 Model Year F-150 and certain 2012 Model Year F-250, F-350, F-450, and F-550 Trucks with a steering column mounted transmission shifter lever for Brake Transmission Shift Interlock switch function.

# 573.6 (c) (2) - Potentially Affected Vehicles

Certain 2011 F-150 models built from September 9, 2011 through September 22, 2011 at the Dearborn Truck Plant (DTP) and the Kansas City Assembly Plant (KCAP). Certain 2012 model year F-250, F-350, F-450, and F-550 models built from September 12, 2011 through September 22, 2011 at the Kentucky Truck Plant (KTP).

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

The steering columns with the BTSI switch for the affected vehicles were assembled by the Nexteer Automotive Corporation at their facility in Mexico.

The Nexteer Contact person is:

Rick Nash - Chief Engineer, Steering Columns and I-Shafts 3900 Holland Road Saginaw, MI 48601 (989) 757-3601

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

Approximately 16,091 vehicles in the United States and federalized territories are potentially affected.

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

Unknown.

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

Ford's steering column supplier shipped steering columns with a component in the Brake Transmission Shift Interlock (BTSI) switch that may have been contaminated. This contamination can cause the plunger shaft in the BTSI switch to bind, thereby inhibiting proper switch function. On affected vehicles, the vehicle can be shifted out of "park" without depressing the brake pedal and would not comply with FMVSS 114 Section S5.3 which requires a vehicle equipped with an automatic transmission that includes a "park" position to be equipped with a system that requires the service brake to be depressed before the transmission can be shifted out of "park." Some of the vehicles have a gross vehicle weight rating greater than 10,000 pounds and are not subject to FMVSS 114. Although these vehicles are not required to meet the requirements, in this instance, Ford has decided to include the vehicles in this action in the interest of safety. As of November 29, 2011, Ford is not aware of any accidents or injuries related to this condition.

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

On Friday, September 23, 2011, End of Line (EOL) testing at the Kentucky Truck Plant (KTP) identified vehicles in which it was possible to shift out of the "park" position without depressing the brake pedal. A similar occurrence was noted at the EOL test at the Dearborn truck Plant (DTP). KTP issued a stop ship on September 23, 2011, for KTP, DTP and the Kansas City Assembly Plant (KCAP). Yard audits were conducted and BTSI switches that exhibited the condition were removed and sent to the steering column supplier for evaluation. Investigation by the steering column supplier determined that the plunger on some switches would bind. Further investigation determined that a component supplied by a 3<sup>rd</sup> tier suppler had contamination that was introduced during the manufacturing process. Further investigation determined the dates that suspect BTSI switches were produced and the vehicle assembly dates.

On November 11, 2011, a Technical Review Group meeting was held and review by the Field Review Committee (FRC) committee was recommended.

On November 28, 2011, the FRC reviewed the issue and approved a field action.

# 573.6 (c) (8) - Service Program

Ford notified dealers on December 6, 2011, to stop demonstrating or delivering the affected vehicles until inspections are performed and switches replaced, if necessary. Ford will notify owners and instruct them to take their vehicles to a Ford or Lincoln dealer to inspect, test, and if necessary, replace the BTSI switch. There will be no charge to owners for this service.

Mailing of owner notification letters will occur on December 19, 2011. Notification to dealers occurred on December 6, 2011.

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

National media attention is likely as with most Ford recalls when posted to NHTSA's safercar.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 11C21 to this action.