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January 30, 2012

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:

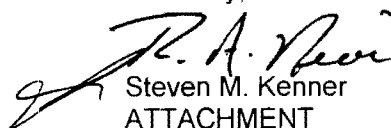
Subject: Ford Motor Company (Ford) recall No. 12C22 - Certain 2012 Model Year Ford Expedition and Lincoln Navigator Vehicles; Inadequate Weld Penetration on 2nd Row, Right Hand Seat, Head Restraint Support Brackets.

Summary

- Ford Action - Ford is conducting a voluntary compliance recall involving certain 2012 model year Ford Expedition and Lincoln Navigator vehicles to replace seat backs that have suspect head restraint support bracket welds.
- Number of Vehicles Involved - Approximately 569 vehicles in the United States and federalized territories are potentially affected.
- Description of Non-Compliance - Ford's seat supplier shipped 2nd row right-hand seats with seat back frames which may have inadequate weld penetration between the head restraint guide sleeve tube and the seat back frame. Some affected seats with inadequate weld penetration for the head restraint guide sleeve tube and seat back frame may not fully comply with the requirements of S4.2.6 (vertical) and S4.2.7 (longitudinal) strength of FMVSS 202a. As of January 13, 2012, there were no warranty reports related to this condition on vehicles in service.
- Service Program - Ford dealers will be notified to stop demonstrating or delivering the affected vehicles until inspections are performed and 2nd row right-hand seat back frames are replaced as appropriate. Ford will notify owners and instruct them to take their vehicles to a Ford or Lincoln dealer for seat inspection and, if necessary, seat back frame replacement.

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



49 CFR Part 573 - NON-COMPLIANCE INFORMATION REPORT
12C22 - 2012 MODEL YEAR FORD EXPEDITION AND LINCOLN NAVIGATOR VEHICLES
INADEQUATE WELD PENETRATION ON 2ND ROW, RIGHT-HAND SEAT, HEAD RESTRAINT
SUPPORT BRACKETS

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 Sections S4.2.6 and S4.2.7 of FMVSS 202a for certain 2012 model year Ford Expedition and Lincoln Navigator vehicles.

573.6 (c) (2) - Potentially Affected Vehicles

Certain Ford Expedition and Lincoln Navigator vehicles built from November 19, 2011 through December 2, 2011 at the Kentucky Truck Plant (KTP) 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 dealer who can obtain specific information regarding the vehicles from the Ford On-line Automotive Service Information System (OASIS) database.

The seats for the affected vehicles were assembled by Johnson Controls Incorporated at their facility in the United States.

The Johnson Controls Incorporated contact is:

Tod Shivak
Quality Director for Seating
49200 Halyard Drive
Plymouth, MI 48170
Ph: (734) 254-5308
tod.a.shivak@jci.com

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

Approximately 569 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 seat supplier shipped 2nd row right-hand seats with seat back frames which may have inadequate weld penetration between the head restraint guide sleeve tube and the seat back frame. Some affected seats with inadequate weld penetration for the head restraint guide sleeve tube and seat back frame may not fully comply with the requirements of S4.2.6 (vertical) and S4.2.7 (longitudinal) strength of FMVSS 202a. As of January 13, 2012, there were no warranty reports related to this condition on vehicles in service.

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

On November 30, 2011, at the KTP, a Lincoln Navigator was identified as having a loose head restraint on the 2nd row right-hand seat, during an audit drive evaluation. An investigation of the head restraint on this vehicle was conducted and it was determined the head restraint guide sleeve had inadequate weld penetration to the seat back frame to fully secure the head restraint. A further investigation was conducted that included review of warranty reports, inspection of vehicles at the assembly plant, supplier process reports, dimensional analysis of seat component parts, and supplier capability. It was determined that one of two weld fixtures used to locate the head restraint guide sleeves to the seat back frame had loose components.

On January 13, 2012, a Technical Review Committee (TRC) was held to review engineering data and vehicle studies.

On January 23, 2012, the Field Review Committee reviewed the issue and approved a field action. Although testing for FMVSS 202a had not been conducted, it was determined that the head restraint brackets with inadequate welds may not meet the requirements of FMVSS 202a.

573.6 (c) (8) - Service Program

Ford dealers will be notified to stop demonstrating or delivering the affected vehicles until vehicle inspections are performed and 2nd row right-hand seat back frames are replaced as appropriate. Ford will notify owners and instruct them to take their vehicles to a Ford or Lincoln dealer for seat inspection and, if necessary, seat back frame replacement. There will be no charge to owners for this service.

Mailing of owner notification letters will occur during the week of February 20, 2012. Notification to dealers will occur on January 31, 2012.

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 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 12C22 to this action.