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

April 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: Supplement to 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

 <u>Ford Action</u> – Ford is supplementing voluntary safety recall 11S16 to add certain 1999 through 2003 model year Ford Windstar vehicles originally sold in or currently registered in Virginia 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 in Virginia 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.

- <u>Number of Vehicles Involved</u> Ford estimates that there are approximately 23,000 vehicles that were either originally sold in or are currently registered in Virginia.
- <u>Effect on Vehicle Operation</u> 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.
- <u>Service Procedure</u> Owners will be notified by mail and instructed to take their vehicle to a Ford or Lincoln dealer to be inspected and have either reinforcement brackets or a new subframe installed. The reinforcement brackets are installed at both front lower control arm rear attaching brackets and both body mount attachments at the rear of the front subframe.

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Ford is voluntarily taking this action as a safety recall to address any potential vehicle owner concerns. Also, Ford is extending the free remedy offer to all vehicle owners in Virginia, 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,

R.A. Vien

Steven M. Kenner

Attachment

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

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 that were built at the Oakville Assembly Plant and either originally sold in or are currently registered in Virginia.

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

The front subframe was produced by a division of Dana Holding Corporation. This division of Dana Holding Corporation was subsequently purchased by Metalsa Structural Products, Inc.

Front Subframe:

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

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

Approximately 23,000 vehicles that were either originally sold in or are currently registered in Virginia.

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

Unknown.

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

The supplier of the front subframe did not consistently complete the phosphating process prior to the electrodepositing corrosion protection (e-coat) application, resulting in poor e-coat adhesion. A front subframe without proper e-coat application may, in the presence of corrosives such as road salt, rust over time and result 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

In March 2012, as part of Ford's on-going monitoring of reports, an increasing trend in rear axle fracture and crack reports was identified on vehicles in Virginia that were not originally included in Ford's rear axle recall 10S13. As a result, Ford has approved an extension of its rear axle recall to include vehicles either currently registered or originally sold in Virginia. As an outgrowth of that rear axle review, in April 2012, Ford gathered and reviewed reports received since the January 2011 announcement of subframe recall 11S16 for front subframe fracture. cracking and/or corrosion for vehicles in Virginia. Twelve incremental reports were identified on vehicles that were not included in 11S16 that may relate to fractures, cracks, or perforations and/or severe corrosion of the front subframe. These reports represent an increase in the number of reports in Virginia compared to the data when 11S16 was announced. The rate of reports in Virginia remains well below the rate of reports in corrosion states when 11S16 was announced. However, despite this lower rate of reports of corrosion-related front subframe fractures, cracks, or perforations, Ford's Field Review Committee reviewed the matter on April 23, 2012, and, to address potential customer concerns and to be consistent with the prior rear axle campaign, approved a field action to extend the subframe recall to include vehicles either originally sold in or currently registered in Virginia.

573.6 (c) (8) - Service Program

Owners will be notified by mail and instructed to take their vehicle(s) to a Ford or Lincoln dealer to be inspected and have either reinforcement brackets or a new subframe installed. The reinforcement brackets are installed at both front lower control arm rear attaching brackets and both body mount attachments at the rear of the front subframe. A subframe replacement will occur in cases where the reinforcement brackets cannot be installed. There will be no charge to owners for this service.

Mailing of owner notification letters will begin June 18, 2012, and is expected to be completed by June 22, 2012. Notification to dealers will occur on May 1, 2012.

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 24, 2011.

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.

Ford will forward a copy of the notification letters to dealers and owners 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 the cost of remedies paid for by vehicle owners per Ford's general reimbursement plan is June 29, 2012.