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July 2, 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. 12S34 – Certain 2013 model year Escape vehicles with pedal package clearance variation

Summary

- <u>Ford Action</u> Ford is conducting a voluntary safety recall involving certain 2013 Escape vehicles with pedal package clearance variation.
- Number of Vehicles Involved Approximately 8,266 vehicles in the United States and federalized territories are potentially affected.
- <u>Effect on Vehicle Operation</u> Certain 2013 Escape vehicles may have the carpet padding
 mispositioned during installation. This may result in the carpet and center console trim panel
 being pushed outboard of the intended design position, reducing clearance relative to the
 pedal package. In certain instances, reduced clearance may result in the operator's foot
 contacting the side of the brake pedal while transferring the foot from the accelerator pedal to
 the brake pedal, potentially increasing stopping distance. Accelerator pedal function is not
 affected by this condition.

Ford has not received any field reports of increased stopping distance for this issue.

<u>Service Procedure</u> – Owners will be notified by mail and instructed to take their vehicle(s) to a
Ford or Lincoln dealer to have the carpet padding removed and the left-side console trim
panel replaced with a new panel which has a revised surface contour.

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 – DEFECT INFORMATION REPORT 12S34 – CERTAIN 2013 ESCAPE VEHICLES – PEDAL PACKAGE CLEARANCE VARIATION

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 2013 Escape vehicles built at Louisville Assembly Plant (LAP) from March 8, 2012, to June 7, 2012.

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.

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

Approximately 8,266 vehicles in the United States and federalized territories 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

Certain 2013 Escape vehicles may have the carpet padding mispositioned during installation. This may result in the carpet and center console trim panel being pushed outboard of the intended design position, reducing clearance relative to the pedal package. In certain instances, reduced clearance on units may result in the operator's foot contacting the side of the brake pedal while transferring the foot from the accelerator pedal to the brake pedal, potentially increasing stopping distance. Accelerator pedal function is not affected by this condition.

Ford has not received any field reports of increased stopping distance for this issue.

573.6 (c) (6) - Chronology of Events

In early June 2012, an employee reported a 2013 Escape package concern relating to the space between the brake pedal and the center console left-side trim panel, which may result in the driver contacting the edge of the brake pedal when transferring the foot from the accelerator to the brake pedal. The concern vehicle was inspected and the distance between the brake pedal and valence panel was insufficient. A review of vehicles built at LAP found that the carpet padding could be mispositioned during installation at LAP, reducing clearance between the carpet and valence panel relative to the pedal package.

On June 25, 2012, Ford's Field Review Committee reviewed the concern and approved a field action.

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 have the carpet padding removed and the left-side console trim panel replaced with a new panel which has a revised surface contour. There will be no charge to owners for this service.

Mailing of owner notification letters will be conducted the week of July 23, 2012. Notification to dealers will occur on July 5, 2012.

In accordance with Part 573.13(d)(1), Ford is excluding reimbursement for costs incurred by owners for repair of this concern 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.

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 12S34 to this action.

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