



Steve M. Kenner, Global Director Automotive Safety Office Sustainability, Environment & Safety Engineering October 1, 2012 Fairlane Plaza South, Suite 400 330 Town Center Drive Dearborn, MI 48126-2738 USA

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. 12C26 - Certain 2011-2013 model year Fiesta vehicles

for passenger side air curtain functional description

Summary

Ford Action - Ford is conducting a voluntary compliance recall involving certain 2011-2013 model year
Fiesta vehicles to make the side air curtain performance consistent with the functional description
contained in the Owner Guide supplied with the vehicle.

- <u>Number of Vehicles Involved</u> Approximately 154,604 vehicles in the United States and federalized territories are potentially affected.
- <u>Description of Non-Compliance</u> Certain 2011-2013 MY Fiesta vehicles produced at Cuautitlan Stamping and Assembly Plant (CSAP) were built with a Restraint Control Module (RCM) calibration that suppresses the passenger side air curtain, as well as the front passenger seat-mounted side airbag, when the Occupant Classification System (OCS) status is classified as "Empty." The Owner Guide for these vehicles accurately depicts the seat-mounted side air bag function; however, the suppression of the side air curtain is not referenced. With this condition, the vehicle meets FMVSS standards for side impact protection, but the right rear seating position may not have coverage of the side air curtain in certain crashes.

FMVSS 208 Section 4.5.1 (f) requires that the owner's manual "include an accurate description of the vehicle's air bag system."

As of September 19, 2012, there are no known reports of accidents or injuries attributed to this condition.

 <u>Service Program</u> - Owners will be notified by mail and instructed to take their vehicles to a Ford or Lincoln dealer to have the RCM calibration updated so that it no longer suppresses the right hand side air curtain when the front passenger seat is classified as "Empty," as described in the Owner Guide.

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

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49 CFR PART 573 - NON-COMPLIANCE INFORMATION REPORT 12C26 - 2011-2013 MODEL YEAR FIESTA VEHICLES PASSENGER SIDE AIR CURTAIN FUNCTIONAL DESCRIPTION

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 non-compliance to the requirements of Section S4.5.1(f) of FMVSS 208 for certain 2011-2013 model year Fiesta vehicles.

573.6 (c) (2) - Potentially Affected Vehicles

Certain 2011-2013 MY Fiesta vehicles built from November 3, 2009, through September 21, 2012, at the Cuautitlan Stamping and Assembly Plant (CSAP) 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.

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

Approximately 154,604 vehicles in the United States and federalized territories are potentially affected.

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

All.

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

Certain 2011-2013 MY Fiesta vehicles produced at Cuautitlan Stamping and Assembly Plant (CSAP) were built with a Restraint Control Module (RCM) calibration that suppresses the passenger side air curtain, as well as the front passenger seat-mounted side airbag, when the Occupant Classification System (OCS) status is classified as "Empty." The Owner Guide for these vehicles accurately depicts the seat-mounted side air bag function; however, the suppression of the side air curtain is not referenced. With this condition, the vehicle meets FMVSS standards for side impact protection, but the right rear seating position may not have coverage of the side air curtain in certain crashes.

FMVSS 208 Section 4.5.1 (f) requires that the owner's manual "include an accurate description of the vehicle's air bag system."

As of September 19, 2012, there are no known reports of accidents or injuries attributed to this condition.

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

Transport Canada (TC) requested information concerning a field report of a 2012 model year Ford Fiesta involved in a side crash with no occupants other than the driver, in which the seat-mounted side airbag and side air curtain on the impacted side of the vehicle (passenger side) did not deploy. TC noted that the language in the 2012 Owner's Guide states that the passenger sensing

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system will deactivate the passenger seat-mounted side airbag if it detects an empty unbuckled passenger seat but does not state that the side air curtain can also be deactivated by the passenger sensing system.

An investigation was undertaken, including a review of the available vehicle test data, the side air curtain deployment strategy, and the airbag system description in the Owner Guide. Based on a review of vehicle test data, Ford's assessment is that the Fiesta vehicles are compliant with the side impact protection requirements of CMVSS and FMVSS 214.

An analysis of the requirements for the air bag system description in the Owner Guide identified the unique requirements of FMVSS 208 Section S4.5.1(f). On September 24, 2012, the Field Review Committee reviewed the issue 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 RCM calibration updated so that it no longer suppresses the right hand side air curtain when the front passenger seat is classified as "Empty," as described in the Owner Guide. Mailing of owner notification letters will begin on October 15, 2012, and be completed on October 19, 2012. There will be no charge to owners for this service.

Ford will notify dealers on October 3, 2012, to stop demonstrating or delivering the affected vehicles.

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 12C26 to this action.