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July 29, 2013

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. 13C04 – Certain 2012-2013 model year Focus BEV and 2013 model year Focus ST vehicles with High Intensity Discharge (HID) Headlamps**

Summary:

- Ford Action - Ford is conducting a voluntary compliance recall involving certain 2012-2013 model year Focus BEV and 2013 model year Focus ST models vehicles equipped with High Intensity Discharge (HID) headlamps to remove the headlamp assembly, modify the internal wiring, and reinstall headlamps.
- Number of Vehicles Involved - Approximately 6,308 vehicles in the United States and federalized territories are affected.
- Description of Non-Compliance – Certain 2012-2013 model year Focus BEV and 2013 model year Focus ST vehicles with High Intensity Discharge (HID) headlamps have an incompatibility issue between the headlamp and body wiring harness. The wiring incompatibility results in an inoperative front side marker condition. This inoperative side marker does not comply with S6.1.5 of FMVSS No.108 which requires illumination of side marker lamps under certain master lighting switch conditions.
- Service Program - Ford notified dealers to stop demonstrating or delivering the affected vehicles until headlamp assemblies are modified as appropriate. Owners will be notified by mail and instructed to take their vehicle(s) to a Ford or Lincoln dealer to have the headlamp assemblies modified.

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

Sincerely,

A handwritten signature in black ink, appearing to read "S. M. Kenner".
for Steven M. Kenner
ATTACHMENT

49 CFR Part 573 - NON-COMPLIANCE INFORMATION REPORT

13C04 – Certain 2012-2013 model year Focus BEV and 2013 model year Focus ST with High Intensity Discharge (HID) Headlamps

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 specified in of Section S6.1.5 of FMVSS No. 108 in certain 2012-2013 Focus BEV and 2013 Focus ST vehicles equipped with High Intensity Discharge (HID) headlamps.

573.6 (c) (2) - Potentially Affected Vehicles

Vehicles affected include 2012-2013 model year Focus BEV vehicles built from September 15, 2011, through May 6, 2013, and 2013 model year Focus ST vehicles built from February 16, 2012, through May 7, 2013, at the Michigan Assembly Plant.

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 headlamps for the affected vehicles were assembled by Varroc Lighting Systems at their facility in the Czech Republic.

The Varroc Lighting Systems contact is:

Quality Director Harold Pope
Varroc Lighting Systems
Suvorovova 195,
742 42 Senov u Noveho Jicina
Czech Republic
hope@varroclighting.com
Phone: +17344464459

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

Approximately 6,308 vehicles in the United States and federalized territories are affected.

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

Unknown.

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

Certain 2012-2013 model year Focus BEV and 2013 model year Focus ST vehicles equipped with High Intensity Discharge (HID) headlamps have an incompatibility issue between the Headlamp and body wiring harness. The wiring incompatibility results in an inoperative front side marker condition. This

inoperative side marker does not comply with S6.1.5 of FMVSS No. 108 which requires illumination of side marker lamps under certain master lighting switch conditions.

Ford is not aware of any accidents or injuries related to this non-compliance.

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

On April 22, 2013, a warranty return was received at the Warranty Parts Return Center for an inoperative Light Emitting Diode (LED) strip. The supplier tested the component in the lab and did not identify an issue with the assembly. Subsequent vehicle testing showed that the LED strip was not functional. A cross functional investigation was initiated including Michigan Assembly Plant (MAP) personnel, Ford engineering, and the headlamp supplier to better understand the supplier's test result. The investigation team studied headlamp and body wiring drawings and specifications, assembly processes, lighting functions, and end-of-line functional tests. Testing was performed at the supplier and at MAP on the body wiring and headlamp assembly. Simultaneously, the team was studying the issue relative to unique Canadian lighting requirements. The team identified an issue with the DRL (Daytime Running Lamps) which is the subject of Ford recall 13C05 and was determined to affect only Canadian vehicles. Ford's Field Review Committee reviewed the issue and approved a field service action on July 22, 2013, to address inoperative side markers which were determined to be non-compliant to the requirements of S6.1.5 of FMVSS No.108.

573.6 (c) (8) - Service Program

Ford will notify dealers on July 31, 2013, to stop demonstrating or delivering the affected vehicles until the headlamp assemblies have been modified. There will be no charge to vehicle owners for this service. Ford will notify owners and instruct them to take their vehicles to a Ford or Lincoln dealer for headlamp assembly modification as required. There will be no charge to owners for this service.

Mailing of owner notification letters will occur the week of August 12, 2013. Notification to dealers will occur on July 31, 2013.

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 13C04 to this action.

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