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November 25, 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: Part 573 Non-Compliance Information Report for Ford Motor Company Recall 13C09

In accordance with the requirements of 49 CFR Part 573 Defect and Non-compliance Information Reports, please find the applicable information regarding Ford Motor Company's voluntary compliance recall 13C09 to address a non-compliance condition related to FMVSS 114 S5.3 – Brake Transmission Shift Interlocks on certain 2013-2014 model year Lincoln MKZ Hybrid vehicles.

Sincerely,

A handwritten signature in blue ink that reads "S.M. Kenner".

for Steven M. Kenner

Attachment

49 CFR Part 573 – NON-COMPLIANCE INFORMATION REPORT
13C09 – CERTAIN 2013-2014 MODEL YEAR LINCOLN MKZ HYBRID VEHICLES NON-
COMPLIANCE TO FMVSS 114 S5.3 – BRAKE TRANSMISSION SHIFT INTERLOCK

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 compliance recall action that it is voluntarily initiating.

573.6 (c) (2) – Potentially Affected Vehicles

Vehicles potentially affected are certain 2013-2014 model year Lincoln MKZ Hybrid vehicles built at the Hermosillo Stamping and Assembly Plant (HSAP) between April 26, 2012, and September 24, 2013.

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 information for the supplier of the transmission range sensor (TRS) sensor is provided below.

Corporate Name of Supplier: Continental Automotive Systems
Supplier Address: One Continental Drive
Auburn Hills, MI 48326
Supplier Phone Number: 248-874-2597
Point of Contact at Supplier: David Cwycyshyn
Country of Origin for the component: Mexico

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

Approximately 7,153 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 Non-Compliance

Section S5.3 of FMVSS 114 requires that [E]ach motor vehicle manufactured on or after September 1, 2010 with a GVWR of 4,536 kilograms (10,000 pounds) or less with an automatic transmission that includes a "park" position shall be equipped with a system that requires the service brake to be depressed before the transmission can be shifted out of "park." This system shall function in any starting system key position in which the transmission can be shifted out of "park."

Certain 2013-2014 model year Lincoln MKZ Hybrid vehicles may have been built with a transmission range sensor (TRS) that does not function properly due to a manufacturing error.

Due to this error, the transmission range sensor signal may be delayed, and the Hybrid Powertrain Control Module (PCM) may incorrectly assume the vehicle is in Neutral and allow the transmission to shift out of Park without the brake pedal applied, increasing the risk of unintended vehicle movement due to an inadvertent shift out of Park.

If a vehicle is equipped with one of these improperly functioning TRS and is inadvertently shifted out of park without brake pedal application, a plausibility check will identify the condition when the vehicle reaches a speed of 0.67 mph and implement a Failure Mode Effects Management (FMEM). The FMEM will automatically shift the vehicle to neutral, apply the parking brake and then shift the vehicle to Park. A warning message will be illuminated in the message center that indicates "Shift system fault, Service required" and the wrench light will be illuminated.

Ford is not aware of any accidents, injuries, or reports of unintended vehicle movement associated with this condition.

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

Ongoing warranty analysis by Transmission Driveline Engineering (TDE) identified warranty claims reporting a wrench light with a P164E Diagnostic Trouble Code (DTC) stored but no other performance symptoms. Some customers reported that their vehicles had shifted to Park without operator action when attempting to move the vehicle. Upon inspection of a customer vehicle at a dealership, it was discovered that the vehicle transmission could be shifted out of the Park position without depressing the brake pedal and that condition subsequently initiated an FMEM routine that resulted in the vehicle being almost immediately shifted back into Park by the transmission control system.

On October 2, 2013, a Compliance Review Committee reviewed this condition.

On November 18, 2013, 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 PCM updated with new software. There will be no charge to owners for this service.

Mailing of owner notification letters will begin December 9, 2013, and is expected to be completed by December 13, 2013. Notification to dealers will occur on November 25, 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.

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 13C09 to this action.

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