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January 2, 2014

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) Service Steering Gears for 2011-2012 Model Year Explorer – Safety Recall #13S14

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 safety recall #13S14.

Sincerely,

Steven M. Kenner

Attachment

49 CFR PART 573 – DEFECT INFORMATION REPORT SERVICE STEERING GEARS FOR 2011-2012 MODEL YEAR EXPLORER – SAFETY RECALL #13S14

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 2011 and 2012 model year Ford Explorer vehicles that received a suspect replacement steering gear after September 1, 2013. Suspect steering gears were produced during September and October 2013. 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 steering gears, that are the subject of this defect report, is provided below:

Service Steering Gear

Supplier Name: TRW Automotive

Supplier Address: 4585 W. 26 Mile Road, Washington, MI 48094

Supplier Telephone: (586) 232-8559 Supplier Contact: Frank Klose

Country of origin for the component: USA

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

Approximately 300 service steering gears for 2011-2012 model year Ford Explorer vehicles in the United States and federalized territories are potentially affected.

Ford has identified 105 VINs in the United States and federalized territories that have received the subject service gears, and 59 un-installed steering gears have been identified to date.

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

Unknown.

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

While conducting current model validation testing, the steering gear supplier identified that certain validation testing had not been conducted on the subject service steering gears. Review of the potential effects from the incomplete testing identified that certain specific faults were improperly evaluated and, if they occurred would result in a locked steering gear. These specific faults have not been identified to have actually occurred on these gears in the field, and our analyses suggest that the likelihood of occurrence is very low. A locked steering gear would not allow an operator to input steering commands to the vehicle, increasing the risk of a crash. This condition only affects suspect steering gears supplied for service replacement.

As of December 13, 2013, Ford is not aware of any field reports related to this condition.

573.6 (c) (6) - Chronology of Events

On October 17, 2013, the supplier informed Ford that a specific test was not conducted during service gear software validation, and, in subsequent Fault Insertion Testing (FIT), performed after the release of service parts, the software did not meet certain requirements. In FIT testing, hardware faults are intentionally introduced into the system, to verify the software detects and properly reacts. This service software did not detect three specific internal electrical component faults. Distribution and sale of the service parts was discontinued from Ford depots.

In late October and November 2013, Ford investigated the number of service gears, if any, that had been placed in service. The field performance of all gears (original and service) was also investigated specifically related to the faults that had been reported. No occurrences of the specific faults were identified to have occurred on these gears in the field and our analyses suggest that the likelihood of occurrence is very low.

On December 4, 2013 a Technical Review Group reviewed the condition.

On December 16, 2013, Ford's Field Review Committee reviewed the data and, determined that a safety defect exists, and that a voluntary safety recall should be conducted.

573.6 (c) (8) - Service Program

Ford will send letters to owners known to have received the suspect service gear based on claim records and instruct them to take their vehicle(s) to a Ford or Lincoln dealer to have the steering gear replaced. Ford will also instruct dealers to review their internal records to identify any other customers who received a suspect gear and to contact these customers and advise them of the recall. Ford will also send information to the Ford Authorized Distributors (FADs) advising them of the concern and requesting that they check their part sales records to identify customers that may have purchased the suspect steering gears. We will request the FADs contact any customers they can identify and advise them to visit a local Ford dealer to have the recall performed. Dealers will install the prior level service steering gear. There will be no charge to owners for this service.

Initial notification to dealers will occur on January 6, 2014. Mailing of owner notification letters will be completed by January 24, 2014.

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 13S14 to this action.

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