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June 3, 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: Amended - Ford Motor Company (Ford) Optional Accessory Equipment Driver's Side All Weather Floor Mat Safety Recall #14S07 (used in certain 2006-2011 Model Year Ford Fusion and Mercury Milan, 2006 Model Year Lincoln Zephyr and 2007-2011 Model Year Lincoln MKZ vehicles)

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 #14S07. This report provides clarification pertaining to the model years of the potentially affected vehicles stated in Part 573.6 (c) (2) – Potentially Affected Equipment and in Part 573.6 (c) (5) – Description of the Defect.

Sincerely,

Steven M. Kenner

Attachment

# 49 CFR Part 573 – DEFECT INFORMATION REPORT SAFETY RECALL #14S07 – CERTAIN FORD OPTIONAL ACCESSORY EQUIPMENT DRIVER'S SIDE ALL WEATHER FLOOR MATS USED IN CERTAIN 2006-2011 MODEL YEAR FORD FUSION AND MERCURY MILAN, 2006 MODEL YEAR LINCOLN ZEPHYR AND 2007-2011 MODEL YEAR LINCOLN MKZ VEHICLES

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 Equipment

Equipment affected is certain driver's side Ford optional all weather floor mats sold for use in certain 2006 through 2011 model year Ford Fusion and Mercury Milan, 2006 model year Lincoln Zephyr, and 2007 through 2011 model year Lincoln MKZ vehicles built at Hermosillo Assembly Plant (HAP) from November 9, 2007, to October 31, 2010.

The Ford all weather floor mats were sold by Ford and Lincoln dealers directly to customers as an optional accessory equipment item. Beginning in November 2007, Ford all weather floor mats were also available as a Factory Installed Accessory if ordered with a new vehicle.

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), by clicking on the "Safety Recalls" link at http://www.ford.com, 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 Equipment Potentially Affected

Approximately 82,579 affected driver's side all weather floor mats were sold worldwide; either over the counter through Ford dealerships or as original equipment.

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

100% of affected driver's side all weather floor mats.

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

The subject driver's side all weather floor mat was specifically designed for use in 2006 through 2011 model year Ford Fusion and Mercury Milan, 2006 model year Lincoln Zephyr and 2007 through 2011 model year Lincoln MKZ vehicles. Model year 2006 through mid-2010 vehicles were designed with one retention device to secure the mat to the floor. A dual retention design was incorporated during the 2010 model year.

An improperly installed all weather floor mat (either not secured to the retention device, double stacked, or secured to a single retention device but grossly out of position) could move and may interfere with the accelerator pedal, potentially inhibiting its return to idle and increasing the risk of a crash.

## 573.6 (c) (6) - Chronology of Events

May 28, 2010 – The National Highway Traffic Safety Administration (NHTSA) opened a Preliminary Evaluation (PE10-019) on 2010 Model Year Ford Fusion and Mercury Milan

vehicles regarding allegations of accelerator pedals being trapped by unsecured all weather floor mats

August 2, 2010 – Ford responded to the Agency's June 25, 2010, Information Request and provided the results of our initial engineering investigation. In an attempt to replicate a potential interference condition, the engineering team observed that even when installed out-of-position, the Ford all weather floor mat could not easily be made to hold the accelerator pedal. When the mat was specifically positioned to hold the accelerator pedal, the pedal typically released easily - most often on its own or with a slight tap on the accelerator pedal. Ford also noted that in the event that the pedal's return to idle was inhibited by an out-of-position Ford all weather floor mat, it was not likely to occur at wide open throttle (WOT) nor result in a high acceleration event.

Ford also noted that all of these vehicles were equipped with floor mat retention systems designed to hold floor mats in place to help minimize the potential for floor mat interference with an accelerator pedal. All weather floor mats sold by Ford for use in the subject vehicles also contained a warning embossed on the top surface of the floor mat, warning operators not to place an all weather floor mat on top of an existing mat.

Throughout the course of this investigation, Ford continued to actively monitor databases for reports of floor mats interfering with the accelerator pedals in these vehicles. As of February 12, 2014, Ford was aware of two accident allegations and no injury allegations pertaining to this subject.

January 7, 2011 – Ford provided a response to the Agency's December 27, 2010 request for updated information.

September 2011 – March 2012: Ford released revised all weather floor mats for both production and service with additional design features to reduce the potential for a mispositioned floor mat to interfere with the accelerator pedal. Ford provided a response to the Agency's July 22, 2011 request for supplemental information on September 9, 2011.

December 12, 2012 – NHTSA upgraded PE10-019 to an Engineering Analysis (EA12-009) on 2008 through early 2010 Model Year Ford Fusion, Mercury Milan, and Lincoln MKZ vehicles regarding allegations of accelerator pedal failure to return to idle due to interference by unsecured or double stacked floor mats in the driver's foot well. Ford responded to the Agency's Information Request on February 22, 2013.

September 13, 2013 – Ford provided a response to the Agency's August 7, 2013 request for updated information.

February 12, 2014 – Ford provided a response to the Agency's verbal request for updated information.

March 2014 – NHTSA informed Ford that their testing facility was able to a rotate a Ford all weather floor mat attached by a single hook in the clockwise direction to create an interference condition with the accelerator pedal. Ford could not duplicate the condition during typical driving with a driver's foot, but Ford engineers could manipulate the mat by hand into this position. Even when positioned in that location, the pedal would typically release itself and return to idle either on its own or by applying light pressure on the floor mat.

May 2014 – Ford had further discussions with NHTSA about their concerns that improperly installed all weather floor mats (i.e. double stacked or otherwise not secured to the retention

devices provided, or a single hook mat rotated grossly out of position) could contact the accelerator pedal. Ford understood that at that time NHTSA was recommending that a safety field action be undertaken on the subject driver's side all weather floor mats.

May 19, 2014 – In response to NHTSA's concerns, Ford's Field Review Committee reviewed their position and approved a safety field action to replace the affected driver's side all weather floor mats with currently released driver's side all weather floor mats that incorporate a thinned out leading edge in the area of the accelerator pedal.

Vehicles built at HAP after October 31, 2010, are not included in this safety recall action because they are equipped with the Brake Over Accelerator (BOA) feature which, on gasoline (non-hybrid) engine vehicles, reduces requested accelerator pedal engine torque when both the accelerator pedal and brake pedal are in an applied position and the vehicle speed is greater than approximately 10 mph. All Hybrid vehicles built at HAP are equipped with a BOA feature which functions similar to the BOA system on gasoline engine vehicles.

### 573.6 (c) (8) - Service Program

Owners that purchased all weather floor mats as a Factory Installed Accessory with their new vehicle will be notified to return their all weather floor mats to their Ford or Lincoln Dealership in exchange for replacement mats.

Owners of all other potentially affected vehicles may have an affected Ford driver's side all weather mat that was purchased separately as an accessory item. These owners will be notified that, if they have an affected Ford driver's side all weather floor mat (based on the part number embossed on the mat), they should return their mats to the dealership in exchange for replacement mats.

In both cases, if the original mats are black, they will receive a replacement set of black front (driver and passenger) mats. If the original set was a different color, they will receive a new replacement set of all four mats in black. Dealerships will scrap the original mats. There will be no charge to owners for this service.

Mailing of owner notification letters is expected to be completed by July 25, 2014. Notification to dealers will occur on May 29, 2014.

#### 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 14S07 to this action.

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