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Steve M. Kenner, Global Director
Automotive Safety Office
Sustainability, Environment & Safety Engineering

Fairlane Plaza South, Suite 400
330 Town Center Drive
Dearborn, MI 48126-2738

March 31, 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 Non-Compliance Information Report for Ford Motor Company Recall 14C03

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 recall 14C03 to address a non-compliance to the requirements of FMVSS 207 S4.2 – General Performance Requirements on certain 2013 and 2014 model year Ford Fusion, Lincoln MKZ, Ford Escape, and Ford C-Max vehicles attached.

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
14C03 – CERTAIN 2013 AND 2014 MODEL YEAR FORD FUSION, C-MAX, ESCAPE AND
LINCOLN MKZ VEHICLES

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 S4.2 of FMVSS 207 for certain 2013 and 2014 model year Ford Fusion, C-max, Escape and Lincoln MKZ Vehicles.

573.6 (c) (2) - Potentially Affected Vehicles

Certain 2013 and 2014 model year Fusion and MKZ vehicles built from August 15, 2012, through September 10, 2013, at the Hermosillo Stamping and Assembly Plant (HSAP), Escape vehicles built from June 5, 2012, through August 12, 2013, at the Louisville Assembly Plant (LAP), and C-Max vehicles built from July 23, 2012, through May 28, 2013, at the Michigan Assembly Plant (MAP) are potentially affected.

Because these vehicles were 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 seatback assemblies is provided below.

Corporate Name of Supplier:	Lear Corporation
Supplier Address:	21557 Telegraph Road Southfield, MI 48034
Phone Number:	248-447-1500
Point of Contact at Supplier:	Katie Ozimek
Country of Origin for the component:	Mexico

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

Seats in approximately 43,135 vehicles in the United States and federalized territories are potentially affected.

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

Unknown.

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

Certain front driver and passenger seatback assemblies may have been produced with sub-standard weld joints attaching the seatback recliner mechanism to the seatback frame. A sub-standard recliner to seatback frame weld joint may separate and the operator may notice noise in the seatback or a loose or leaning seatback. Sub-standard recliner to seatback welds may also not meet the requirements of S4.2 of FMVSS 207, potentially increasing the risk of injury in certain collisions.

Ford is aware of 12 warranty claims potentially related to this condition that reported noise, or a loose or leaning seatback. As of March 25, 2014, there were no known reports of accidents or injuries attributed to this condition.

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

In November 2013 Ford identified a small number of warranty reports associated with seatback recliners in the subject vehicles. A review of those warranty claims did not identify any patterns or trends associated with typical attributes such as date of manufacture, option content, or usage in the field.

From November 2013 through January 2014 Ford began to obtain and evaluate parts from the field that had been replaced under warranty. A review of the detailed supplier manufacturing information available for the field return parts identified certain production conditions that could result in sub-standard seat recliner welds. Those conditions included power outages, maintenance actions, and other activities that impacted the robotic weld process on certain parts. It was further identified that certain process controls failed to properly identify parts with sub-standard welds at the supplier.

During January through March 2014, Ford continued to monitor field reports, obtained additional parts replaced under warranty, and obtained seat back frames from vehicles that had seatback assemblies manufactured in close time-proximity to some of those previously returned, for analysis. Ford and the seatback manufacturer also continued to review manufacturing records from the beginning of production (beginning of the 2013 model year) through November 2013 when corrective actions were fully implemented at the manufacturing facility. This review of manufacturing information identified other production dates during which sub-standard seat recliner welds may have escaped process controls. Although no reports from the field have been identified on parts produced during those specific time periods, those parts are also included in this action.

Section 4.2 of FMVSS 207 requires that:

When tested in accordance with S5, each occupant seat shall withstand the following forces, in newtons, except for: a side-facing seat; a passenger seat on a bus other than a school bus; a passenger seat on a school bus with a GVWR greater than 4,536 kilograms (10,000 pounds); and, a passenger seat on a school bus with a GVWR less than or equal to 4,536 kg manufactured before October 21, 2011.

- (a) In any position to which it can be adjusted—20 times the mass of the seat in kilograms multiplied by 9.8 applied in a forward longitudinal direction;*
- (b) In any position to which it can be adjusted—20 times the mass of the seat in kilograms multiplied by 9.8 applied in a rearward longitudinal direction*

On March 24, 2014, Ford's Field Review Committee reviewed this concern and approved a field action.

573.6 (c) (8) - Service Program

Ford will notify dealers to stop demonstrating or delivering the affected vehicles until the seatbacks are replaced. Ford will notify owners and instruct them to take their vehicles to a Ford or Lincoln dealer for seatback replacement. There will be no charge to owners for this service.

Mailing of owner notification letters will occur during the week of May 19, 2014. Initial notification to dealers will occur on April 2, 2014.

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 14C03 to this action.