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June 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: Amended - Ford Motor Company (Ford) 2008-2011 Model Year Ford Escape and Mercury Mariner Safety Recall #14S05

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 #14S05. This report provides additional detail pertaining to Part 573.6 (c) (8) - Service Program, that supplements the information provided in Ford's May 27, 2014 communication to the Agency.

Sincerely,

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

Steven M. Kenner

Attachment

49 CFR Part 573 – DEFECT INFORMATION REPORT
2008-2011 MODEL YEAR FORD ESCAPE AND MERCURY MARINER
ELECTRIC POWER STEERING SAFETY RECALL #14S05

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 2008-2011 model year Ford Escape and Mercury Mariner vehicles built at the Kansas City Assembly Plant from August 18, 2006, to September 11, 2010.

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), 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.

The information for the supplier of the subject Power Steering Control Module (PSCM) is provided below.

Power Steering Control Module:

Nexteer
3900 E. Holland Rd.
Saginaw, MI 48601-9494
(989) 757-5000
Point of Contact at Supplier: VP of Quality, (989) 757-5000
Country of origin: Mexico

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

Approximately 740,878 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 Defect

In some of the affected vehicles, a poor signal to noise ratio in the torque sensor within the Electric Power Steering (EPS) system does not allow the PSCM to determine the driver's steering input. Once this condition is detected, the system removes power steering assist, and defaults to manual steering mode. In the event of a loss of power steering assist, the mechanical linkage between the steering wheel and the road is maintained at all times. Loss of power steering assist while driving would require higher steering effort at lower vehicle speeds, which may result in an increased risk of a crash.

573.6 (c) (6) – Chronology of Events

September 2009 - Ford and Nexteer (known as Delphi in 2009) began to investigate quality issues with the torque sensor due to an elevated rate of replacement, primarily in taxi fleets.

September 11, 2010 - A PSCM with an improved torque sensor was incorporated into Ford Escape, Mercury Mariner, and Mazda Tribute vehicles built at the Kansas City Assembly Plant.

November 9, 2011 - Transport Canada (TC) submitted an Information Request to Ford concerning seven reports of loss of power steering assist on certain 2005-2011 model year Ford Escape vehicles. Ford responded to TC's information request on December 16, 2011.

This response noted that Ford and Nexteer had previously reviewed customer complaints pertaining to the Electric Power Steering system in these vehicles, and that this analysis found customer complaints regarding the EPS system to pertain to a variety of conditions. Some of the complaints alleged loss of power steering assist while driving. Further analysis of the loss of power steering assist reports had found that the majority pertained to a poor signal to noise ratio in the torque sensor within the EPS system in 2008-2011 model year Escape vehicles, which would not allow the PSCM to determine the driver's steering input. Once detected, power steering assist would no longer be provided. The steering system would default to manual steering mode, and the vehicle could still be steered because the mechanical linkage between the steering wheel and the road is maintained at all times similar to other steering systems, both hydraulic and electric. Ford notes the EPS system used on the 2005-2007 model year Escapes was of a different design and from a different supplier than the system in question.

January 17, 2013 Transport Canada advised that they were elevating their investigation to Level III status.

May 29, 2013 - Ford provided a data update to Transport Canada in response to their April 17, 2013 request for updated information. In addition to the data update request, Transport Canada revised the scope of their investigation to 2008-2011 model year Escapes.

October 1, 2013 Transport Canada upgraded its investigation to Level IV status.

January 24, 2014 - Ford released a torque sensor repair kit to address customer concerns related to the high cost of repair.

January 30, 2014 - Ford met with Transport Canada via WebEx to review preliminary data collected by Transport Canada during a simulated loss of power steering assist drive evaluation performed by non-professional drivers. Ford and Transport Canada officials continued to have ongoing dialogue regarding the results of their study.

March 19, 2014 - Ford provided a data update to Transport Canada in response to their February 12, 2014 request for updated information.

April 2014 - During ongoing dialogue regarding their investigation, Ford extended an offer to Transport Canada officials to drive an Escape equipped with a steering system that could be manually triggered to simulate loss of power steering assist.

May 2014 - Transport Canada and Ford had discussions regarding their ongoing investigation into reports of loss of power steering assist while driving in the subject vehicles.

May 19, 2014 – Accordingly, Ford's Field Review Committee reviewed their position and approved a safety field action in order to address their concern with these vehicles.

As of August 20, 2013, Ford is aware of six NHTSA Vehicle Owner Questionnaires (VOQs) noting five accident allegations and six injury allegations potentially pertaining to this subject.

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.

Dealers will check the Power Steering Control Module (PSCM) for Diagnostic Trouble Codes (DTC):

- If no loss of steering assist DTCs are present, dealers will update the PSCM and instrument cluster module software. The updated PSCM software changes the torque sensor fault strategy and will no longer remove power steering assist during an ignition cycle for a single torque sensor fault. Additionally, the software update will provide audible and visual warnings to the driver in the unlikely event that a torque sensor fault is detected.
- If upon initial inspection certain loss of steering assist DTCs are present, the dealer will either replace the torque sensor or the PSCM, depending on the DTC present.

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 is planned to occur on May 29, 2014.

Ford's general reimbursement plan for the cost of remedies paid for by vehicle owners prior to notification of a safety recall was provided to the agency on February 20, 2013.

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 14S05 to this action.

573.13 (c) (2) – Ending Date for Reimbursement Eligibility

The ending date for reimbursement eligibility for the cost of remedies paid for by vehicle owners per Ford's general reimbursement plan is July 4, 2014.

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