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By Recall Mangement Division at 11:47 am, Jul 02, 2014



Steve M. Kenner, Global Director
Automotive Safety Office
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Fairlane Plaza South, Suite 400
330 Town Center Drive
Dearborn, MI 48126-2738

June 30, 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) Non-Compliance Recall #14C06 – Certain 2014 Transit Connect Vehicles Shipped to Puerto Rico

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 #14C06 to address a non-compliance to certain requirements of FMVSS 135 on certain 2014 model year Ford Transit Connect vehicles which were shipped to Puerto Rico.

Sincerely,

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

for Steven M. Kenner

ATTACHMENTS

49 CFR PART 573 - NON-COMPLIANCE INFORMATION REPORT
14C06 – CERTAIN 2014 TRANSIT CONNECT VEHICLES SHIPPED TO PUERTO RICO

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 5.4.3 of FMVSS 135 for certain 2014 model year Ford Transit Connect vehicles in Puerto Rico.

573.6 (c) (2) - Potentially Affected Vehicles

Certain 2014 model year Ford Transit Connect vehicles built from March 1, 2014, through May 15, 2014, at the Valencia, Spain, assembly plant are potentially affected. All of the affected vehicles were shipped to Puerto Rico.

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.

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

Approximately 368 vehicles in Puerto Rico are potentially affected. No vehicles in the United States are affected.

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

100%

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

Certain 2014 model year Ford Transit Connect vehicles were shipped to Puerto Rico with a European brake reservoir pictogram cap label which does not contain the text prescribed by FMVSS 135, Section 5.4.3. Without this warning, someone may use the wrong replacement brake fluid, resulting in damaged seals and potentially increased stopping distances, which could increase the risk of a crash.

Section 5.4.3 of FMVSS 135 requires, in part, that:

...Each vehicle equipped with hydraulic brakes shall have a brake fluid warning statement that reads as follows, in letters at least 3.2 mm (1/8 inch) high: "WARNING: Clean filler cap before removing. Use only ____ fluid from a sealed container."

The European brake reservoir pictogram cap label has pictures rather than words, but indicates similar information (including "DOT 4") and the cap meets all performance requirements. Other than the absence of the prescribed textual labeling requirements of Section 5.4.3, all other performance and regulatory requirements of FMVSS 135 are fully compliant. Ford is not aware of any field reports potentially related to this condition, including no known reports of accidents or injuries.

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

During a late May 2014 plant audit, it was determined that the part release system may have inappropriately released the European brake reservoir pictogram cap label for units shipped to Puerto Rico. Subsequent engineering investigation confirmed that the European brake reservoir pictogram cap label had been released and installed on vehicles shipped to Puerto Rico.

On June 23, 2014, Ford's Field Review Committee reviewed the concern and approved a field action.

573.6 (c) (8) - Service Program

Ford will replace the pictogram brake reservoir cap with an FMVSS 135 compliant cap. Ford will notify owners and instruct them to take their vehicles to a Ford or Lincoln dealer for cap replacement. There will be no charge to owners for this service.

Mailing of owner notification letters will occur by the week of July 14, 2014. Notification to dealers will occur on July 1, 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 14C06 to this action.

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