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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

August 4, 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 #14C07 – Certain 2015 Lincoln MKC Vehicles with Windshield Air Bubbles

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 #14C07 to address a non-compliance to certain requirements of FMVSS 205 – Glazing Materials.

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
14C07 – CERTAIN 2015 MKC VEHICLES WITH WINDSHIELD AIR BUBBLES

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 5.1.1 of FMVSS 205 for certain 2015 model year Lincoln MKC vehicles.

573.6 (c) (2) - Potentially Affected Vehicles

Certain 2015 model year Lincoln MKC vehicles built from August 20, 2013, through June 6, 2014, at the Louisville Assembly Plant 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.

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

Approximately 1,139 vehicles in the US are potentially affected. No vehicles in the Federal Territories are affected.

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

Approximately 0.35%

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

FMVSS 205 S5.1.1 specifies meeting the requirements of ANSI Z26.1-1996 Section 5.3 - Humidity Test, and Section 5.4 - Boil Test which prohibits bubbles in the test specimen. Production vehicle performance indicates that some affected vehicles would not be expected to comply with these requirements. The presence of bubbles may affect driver visibility, which could have a detrimental effect on the safe operation of the vehicle.

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

During a June plant quality audit, two 2015 model year Lincoln MKC vehicles were identified with windshields exhibiting visual blemishes that looked like bubbles, and a Stop-Ship was implemented. In a subsequent review with Ford's Critical Concern Review Group, engineering reported that one windshield with bubbles had been identified on an evaluation fleet vehicle.

Bubbling is the result of air trapped in the vinyl between the two pieces of glass becoming visible over time with elevated temperatures. Ford engineering and the supplier identified a concern with the de-air process at the supplier facility due to a pinched vacuum hose.

June-July 2014: Ford engineering reviewed the effect of the formation of bubbling on the windshield strength and reported that the level of bubbling exhibited on problematic parts would have no measurable effect on the strength of the glazing or on vehicle crash performance.

Based on vehicle and component testing, Ford engineering and the supplier developed time/temperature exposure criteria that would identify any windshields that have the potential to develop bubbles. Subsequent review of vehicle assembly and shipping data indicated that some of the vehicles, which are the subject of this Part 573 report, may not have been exposed to these criteria at the time they left Ford's control.

As of July 28, 2014, there were no accident or injury allegations for windshield bubbling in a 2015 model year Lincoln MKC.

On July 28, 2014, Ford's Field Review Committee reviewed the compliance concern and approved a field action.

573.6 (c) (8) – Service Program

Owners will be notified by mail and asked to bring their vehicle(s) to a Ford or Lincoln dealer if the windshield in their vehicle exhibits visible bubbles or to bring their vehicle(s) to a dealer to have the windshield inspected. Windshields with bubbles will be replaced. There will be no charge to owners for this service.

Mailing of owner notification letters will occur the week of August 11, 2014. Notification to dealers will occur on Tuesday, August 5, 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 14C07 to this action.

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