

Stacy L. Balzer Operating Director Service Engineering Operations Ford Customer Service Division Ford Motor Company P. O. Box 1904 Dearborn, Michigan 48121

May 08, 2023

TO: All U.S. Ford and Lincoln Dealers

SUBJECT: NEW VEHICLE DEMONSTRATION / DELIVERY HOLD -Safety Recall 22S37 – Supplement #1 Certain 2019 - 2020 Model Year Mustang 5.0L Vehicles with a Manual Transmission Powertrain Control Module Reprograming

REF: NEW VEHICLE DEMONSTRATION / DELIVERY HOLD -Safety Recall 22S37 Dated: June 1, 2022

TSB: 21-2062 - 5.0L - Manual Transmission - Inoperative Reverse Camera and Inoperative Reverse Lights With Various Other Symptoms

ROUSH PERFORMANCE TSB: TSB 22-0209-AC - 2019-2020 MT82 Mustang -Rear Camera Fault (RW-0401M/R)

New! <u>REASON FOR THIS SUPPLEMENT</u>

- Affected Vehicles: Added US population of affected vehicles.
- Service Action: Added direction for ROUSH supercharged vehicles.
- **Attachments:** Added Attachment IV: Mobile Service Repair Assessment and Attachment V: Mobile Repair/Vehicle Pick-Up and Delivery Record.
- Mobile Repair: Added mobile repair information and assessment level.
- Pick-up and Delivery: Added pick-up and delivery information.
- **Claims Preparation and Submission:** Added direction for ROUSH supercharged vehicles, pick-up and delivery and mobile repair information.
- Labor Allowances: Do not claim FSA labor for ROUSH supercharged vehicles. Refer to Roush TSB 22-0209-AC. Added pick-up and delivery and mobile service description and labor operations.
- Technical Information: For ROUSH supercharged vehicles, refer to Roush TSB 22-0209-AC.

New! AFFECTED VEHICLES

١	Vehicle	Model Year	Assembly Plant	Build Dates
Ν	lustang	2019-2020	Flat Rock Assembly	January 18, 2018 through December 16, 2020

US population of affected vehicles: 24,822. Affected vehicles are identified in OASIS and FSA VIN Lists.

REASON FOR THIS SAFETY RECALL

In all of the affected vehicles, the manual gear position sensor may be causing the rear view camera display, reverse lamps, and various driver assist features (traction control, forward collision warning, blind spot warning, and cross-traffic indicator) to stop functioning.

REASON FOR THIS SAFETY RECALL (continued)

If the modules controlling the rear-view camera, reverse lamps, and other driver assist features receive a faulted gear position sensor signal from the Powertrain Control Module (PCM), it may disable the features. An instrument cluster warning light may illuminate along with a message indicating function is not available. A rear view camera or reverse lamp that is disabled reduces the driver's view of what is behind the vehicle, increasing the risk of a crash. A disabled driver assist feature may also increase the risk of a crash.

New! SERVICE ACTION

Before demonstrating or delivering any new in-stock vehicles involved in this recall, dealers are to reprogram the PCM software to the latest level using the Integrated Diagnostic System (IDS) level 125 or higher.

This service must be performed on all affected vehicles at no charge to the vehicle owner.

NOTE: For ROUSH supercharged vehicles, refer to Roush TSB 22-0209-AC.

OWNER NOTIFICATION MAILING SCHEDULE

Owner letters were mailed the week of June 13, 2022. Dealers should repair any affected vehicles that arrive at their dealerships, whether or not the customer has received a letter.

PLEASE NOTE:

Federal law requires dealers to complete this recall service before a new vehicle is delivered to the buyer or lessee. Violation of this requirement by a dealer could result in a civil penalty of up to \$26,315 per vehicle. Correct all vehicles in your new vehicle inventory before delivery.

New! ATTACHMENTS

Attachment I:Administrative InformationAttachment II:Labor Allowances and Parts Ordering InformationAttachment III:Technical InformationAttachment IV:Mobile Service Repair AssessmentAttachment V:Mobile Repair/Vehicle Pick-Up and Delivery RecordOwner Notification LetterBecall Reimbursement Plan

QUESTIONS & ASSISTANCE

For questions and assistance, contact the Special Service Support Center (SSSC) via the SSSC Web Contact Site. The SSSC Web Contact Site can be accessed through the Professional Technician System (PTS) website using the SSSC link listed at the bottom of the OASIS VIN report screen or listed under the SSSC tab.

Sincerely,

Stacy L. Balzer

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NEW VEHICLE DEMONSTRATION / DELIVERY HOLD – Safety Recall 22S37 – Supplement #1

Certain 2019 – 2020 Model Year Mustang 5.0L Vehicles with a Manual Transmission Powertrain Control Module Reprograming

New! <u>MOBILE REPAIR RECOMMENDATIONS</u>

- Confirm with the customer a mobile repair is feasible.
- Check OASIS before going to the customer's home or business to confirm if any other outstanding FSA needs to be completed.
- Transportation due to the simplicity of this repair, a specialty vehicle is not required. **New!** MOBILE REPAIR ADDITIONAL INFORMATION

Please ensure the technician brings the following to the mobile repair destination:

- Printed Technical Instructions.
- Printed Repair/Work Order or any other necessary documentation as customer copy(s)
 Documents could also be emailed to the customer.
- Shirt/uniform and vehicle graphic with the dealership or Ford logos are recommended.
- Recommended tools and cleaning supplies: IDS at level 125 or higher.

New! MOBILE REPAIR QUESTIONS AND ASSISTANCE

Dealers participating in the Remote Experience Program:

• Refer to Electronic Field Communication - EFC12071 2023 Remote Experience Program. Dealers not participating in the 2023 Remote Experience Program:

- For questions and assistance, contact the Special Service Support Center (SSSC) via the SSSC Web Contact Site. Work with Dealership warranty administrator to create a SSSC contact ID#.
- Once an SSSC agent responds to the new contact ID#, you may opt to call the SSSC hotline: (800) 325-5621.

New! <u>MOBILE SERVICE REPAIR ASSESSMENT LEVEL</u>

All repairs in this program have the following assessment level:

 *** - Mobile Reprogramming

OASIS ACTIVATION

OASIS was activated on June 01, 2022.

FSA VIN LISTS ACTIVATION

FSA VIN Lists were available through <u>https://web.fsavinlists.dealerconnection.com</u> on June 01, 2022. Owner names and addresses were available by July 01, 2022.

NOTE: Your FSA VIN Lists may contain owner names and addresses obtained from motor vehicle registration records. The use of such motor vehicle registration data for any purpose other than in connection with this recall is a violation of law in several states, provinces, and countries. Accordingly, you must limit the use of this listing to the follow-up necessary to complete this recall.

SOLD VEHICLES

- Ford has not issued instructions to stop selling/delivering or driving used vehicles under this safety recall. Owners should contact their dealer for an appointment to have their vehicles remedied as soon as practicable.
- Immediately contact any of your affected customers whose vehicles are not on your VIN list but are identified in OASIS. Give the customer a copy of the Owner Notification Letter and schedule a service date.

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SOLD VEHICLES (continued)

- Correct other affected vehicles identified in OASIS which are brought to your dealership.
- Dealers are to prioritize repairs of customer vehicles over repairs of new and used vehicle inventory.

STOCK VEHICLES

- Correct all affected units in your new vehicle inventory before delivery.
- Use OASIS to identify any affected vehicles in your used vehicle inventory.

DEALER-OPERATED RENTAL VEHICLES

The Fixing America's Surface Transportation (FAST) Act law effective June 2016 prohibits a rental company from selling, renting or leasing vehicles subject to a safety or compliance recall. Please consult your legal counsel for legal advice.

TITLE BRANDED / SALVAGED VEHICLES

Affected title branded and salvaged vehicles are eligible for this recall.

OWNER REFUNDS

- This safety recall must still be performed, even if the owner has paid for a previous repair. Claiming a refund will not close the recall on the vehicle.
- Ford Motor Company is offering a refund for owner-paid repairs covered by this recall if the repair was performed before the date indicated in the reimbursement plan, which is posted with this bulletin. Owners are directed to seek reimbursement through authorized dealers or, at their option, directly through Ford Motor Company at P.O. Box 6251, Dearborn, MI 48121-6251.
- Dealers are also pre-approved to refund owner-paid <u>emergency</u> repairs that were performed away from an authorized servicing dealer after the end date specified in the reimbursement plan. Non-covered repairs, or those judged by Ford to be excessive, will not be reimbursed.
- Refunds will only be provided for the cost associated with a manual gear position sensor causing the rear view camera and reverse lamps to stop functioning.

RENTAL VEHICLES

Rental vehicles are not approved for this program.

New! <u>PICK-UP AND DELIVERY</u>

All customers affected by this program have the option of complimentary Vehicle Pick-up & Delivery service (at participating dealers).

Dealers participating in the Remote Experience Program:

• Refer to EFC12071, 2023 Remote Experience Program, Pickup & Delivery (PDL) Offset section for additional details.

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New! <u>PICK-UP AND DELIVERY</u> (continued)

Dealers not participating in the 2023 Remote Experience Program for Pick-up & Delivery are authorized to claim unique services for completing this program.

- Dealers are authorized to claim one-half labor hour per repair for vehicle pick-up & delivery services. Refer to Labor Allowances for details.
- Dealers must retain a Vehicle Pick-up & Delivery Record with the repair order documentation.

ADDITIONAL REPAIR (LABOR TIME AND/OR PARTS)

Additional repairs identified as necessary to complete the FSA should be managed as follows:

For related damage and access time requirements, refer to the Warranty and Policy Manual / Section 6 – Ford & Lincoln Program Policies / General Information & Special Circumstances for FSAs / Related Damage.

- For vehicles within new vehicle bumper-to-bumper warranty coverage, no SSSC approval is required, although related damage must be on a separate repair line with the "Related Damage" radio button checked.
 - Ford vehicles 3 years or 36,000 miles
- For vehicles outside new vehicle bumper-to-bumper warranty coverage, submit an Approval Request to the SSSC Web Contact Site prior to completing the repair.

New! CLAIMS PREPARATION AND SUBMISSION

NOTE: Vehicles equipped with an aftermarket Roush supercharger kit do not carry coverage for this FSA. Refer to ROUSH PERFORMANCE TSB: TSB 22-0209-AC - 2019-2020 MT82 Mustang - Rear Camera Fault (RW-0401M/R).

- Claim Entry: Enter claims using Dealer Management System (DMS) or One Warranty Solution (OWS) online.
 - When entering claims, select claim type 31: Field Service Action. The FSA number (22S37) is the sub code.
 - For additional claims preparation and submission information, refer to the Recall and Customer Satisfaction Program (CSP) Repairs in the OWS User Guide.
- Related Damage/Additional labor and/or parts: Must be claimed as Related Damage on a separate repair line from the FSA with same claim type and sub code as described in Claim Entry above.

IMPORTANT: Click the Related Damage Indicator radio button.

- **Refunds:** Submit refunds on a separate repair line.
 - Program Code: 22S37 Misc. Expense: ADMIN
 - Misc. Expense: REFUND Misc. Expense: 0.2 Hrs.
 - Multiple refunds should be submitted on one repair line and the invoice details for each repair should be detailed in the comments section of the claim.

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NEW VEHICLE DEMONSTRATION / DELIVERY HOLD – Safety Recall 22S37 – Supplement #1

Certain 2019 – 2020 Model Year Mustang 5.0L Vehicles with a Manual Transmission Powertrain Control Module Reprograming

New! LABOR ALLOWANCES

Description	Labor Operation	Labor Time
Reprogram the PCM to the latest level with IDS (IDS Level 125.00 or higher)	22S37B	0.3 Hours
 Mobile Service: Can be used when the repair takes place away from the dealership. If Additional Time is Required Due to Travel, Please Submit an SSSC Approval Form. This allowance is only for <u>non-eligible</u> 2023 Remote Experience Program dealers. NOTE: This allowance is for dealer-performed mobile service. Can only be claimed once, regardless of outstanding FSAs repaired. 	22S37MM	0.5 Hours
Vehicle Pick-up and Delivery Allowance: This allowance is only for <u>non-eligible</u> 2023 Remote Experience Program dealers. NOTE: This allowance is for dealer-performed vehicle pick- up/delivery for dealership repairs only. Can only be claimed once, regardless of outstanding FSAs repaired.	22S37PP	0.5 Hours

NOTE: Do not claim FSA labor for vehicles equipped with an aftermarket Roush supercharger kit. Refer to ROUSH PERFORMANCE TSB: TSB 22-0209-AC - 2019-2020 MT82 Mustang - Rear Camera Fault (RW-0401M/R).

PARTS REQUIREMENTS / ORDERING INFORMATION

Parts are not required to complete this repair.

CERTAIN 2019 - 2020 MODEL YEAR MUSTANG 5.0L VEHICLES WITH A MANUAL TRANSMISSION — POWERTRAIN CONTROL MODULE REPROGRAMMING

SERVICE PROCEDURE

Module Reprogramming

- **NOTE:** Reprogram appropriate vehicle modules before performing diagnostics and clear all DTCs after programming. For DTCs generated after reprogramming, follow normal diagnostic service procedures.
- 1. Connect a battery charger to the 12V battery.
- **NOTE:** Verify that the negative cable of the charger is installed on a chassis or engine ground, and not the 12 volt battery negative terminal to prevent the battery saver mode from activating on the vehicle.
- **NOTE**: If the diagnostic software does not load or if the vehicle cannot be identified properly, make sure there is a good internet connection and the Vehicle Communication Module (VCM) is properly connected to the Data Link Connector (DLC).

NOTE: Make sure the IDS computer does not enter sleep mode during programming.

- 2. Is the vehicle equipped with the 5.0L engine, MT82 manual transmission and optional Roush Supercharger (SC-PP-2) Kit Package?
 - **YES** Perform Roush Performance TSB 22-0209-AC. Refer to the web-links below to retrieve TSB 22-0209-AC from the Roush Performance website. Continue to Step 4.
- **NOTE:** On the Roush Performance website, click the support tab and search for TSB-22-0209-AC.

Roush Performance website <u>www.roushperformance.com</u> Direct TSB article link <u>Click Here</u>

• NO - Continue to Step 3.

3. Perform a **Software Update** to the **PCM** using Integrated Diagnostic Software (IDS) release **125.00** or higher. Make sure you are connected to the Internet prior to reprogramming.

NOTE: Calibration files may also be obtained at <u>www.motorcraftservice.com</u>.

NOTE: Follow the IDS on-screen instructions to complete the reprogramming procedure.

4. Disconnect the battery charger from the 12V battery once the reprogramming has completed.



Important Information for Module Programming

- **NOTE:** When programming or reprogramming a module, use the following basic checks to ensure programming completes without errors.
- Inspect the Vehicle Communication Module II (VCM II)/Vehicle Communication Module III (VCM III) or the Vehicle Communication and Measurement Module (VCMM) and the cables for any damage. Make sure scan tool connections are not interrupted during programming.
- A hardwired connection is strongly recommended.
- Turn off all unnecessary accessories (radio, heated/cooled seats, headlamps, interior lamps, HVAC system, etc.) and close doors.
- Disconnect/depower any aftermarket accessories (remote start, alarm, power inverter, CB radio,etc.).
- Follow all scan tool on-screen instructions carefully.
- Disable IDS/scan tool sleep mode, screensaver, hibernation modes.
- Create all sessions Key ON Engine OFF (KOEO). Starting the vehicle before creating a session will cause errors within the programming inhale process.

Recovering a module when programming has resulted in a blank module: <u>NEVER DELETE THE ORIGINAL SESSION!</u>

- a. Obtain the original IDS that was used when the programming error occurred during Module Reprogramming (MR) or Programmable Module Installation (PMI).
- b. Disconnect the VCM II/VCM III from the Data Link Connector (DLC) and the IDS.
- c. Reconnect the VCM II/VCM III to IDS and then connect to the DLC. Once reconnected, the VCM II/VCM III icon should appear in the corner of the IDS screen. If it does not, troubleshoot the IDS to VCM II/VCM III connection.
- d. Locate the original vehicle session when programming failed. This should be the last session used in most cases. If not, use the session created on the date that the programming failed.
- **NOTE:** If the original session is not listed in the previous session list, click the Recycle Bin icon at the lower right of the previous session screen. This loads any deleted sessions and allows you to look through them. Double-click the session to restore it.
- e. Once the session is loaded, the failed process should resume automatically.
- f. If programming does not resume automatically, proceed to the Module Programming menu and select the previously attempted process, PMI or MR.
- g. Follow all on-screen prompts/instructions.
- h. The last screen on the IDS may list additional steps required to complete the programming process. Make sure all applicable steps listed on the screen are followed in order.



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NEW VEHICLE DEMONSTRATION / DELIVERY HOLD -

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MOBILE REPAIR / VEHICLE PICK-UP AND DELIVERY RECORD

VIN ______ received (check one):

□ Mobile Repair

□ Pick-up and/or delivery service

As outlined below for the 22S37-S1 Field Service Action program.

Mobile Repair – Date: ______

OR

Pick-up – Date: _____

Delivery – Date: ______

Repair Order #

Repair Order Date

Service Manager Signature

Date

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Mobile Service Repair Assessment

The following assessment will be used to indicate how mobile friendly a program is.

Dealer Bulletin

This system may be broken down by labor operations or models. If the program has an inspection followed by a potential repair, then the assessment level will be broken down into an inspection assessment level and a repair assessment level to show the mobile friendliness of the repair on the vehicle. If the program has multiple repair options (determined by model, model year or options) then the assessment level will also be determined by the options to show the mobile friendliness of the repair on the vehicle.

Assessment Levels

- Mobile Reprogramming
- Light Mobile Service
- *x* Enhanced Mobile Service
- Advanced Mobile Service
- 🕲 Wheel and Tire Mobile Service
- ^I⊗- Not Mobile Service Capable

Description of each level that is used to determine the overall assessment.

- Mobile Reprogramming
 - Module Programming or similar type services
 - Minimum tools maybe required other than an IDS/FDRS setup
 - FDRS programming that requires internet connection (wi-fi or mobile hotspot)
 - Make sure vehicle has a charge port to ensure battery voltage is maintained during flashing of the module(s)
 - Repairs not greater than 1 hour in length (including time to wait for programming) *Note: The location will need a charging station or wall box to maintain the 12-volt battery.*

Light Mobile Service

- Interior repair procedures that do not require seat, dash, or headliner removal
- Under hood repairs that do not require large component removal
- Exterior repairs that do not require large component/panel removal
- Repairs may require standard hand tools (Access to a Technician starter kit or similar)

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Certain 2019 – 2020 Model Year Mustang 5.0L Vehicles with a Manual Transmission Powertrain Control Module Reprograming

- Enhanced Mobile Service

- Anytime a procedure requires work under the vehicle to have a two-person process
- Brake Inspection and Brake Repair/Replacement
- Limited Suspension Component replacement (no alignment)
- Under Vehicle access for limited repairs (no large component removal)
- Vehicle Check Up VCU
- Pre-Delivery Inspection PDI
- Used Car Inspection/Presale Inspection
- May require floor jack, jack stands, and impact tools

Note: Wheel lock maybe required.

- Advanced Mobile Service

- Fluid Exchange/Oil Change
- Light Repairs
- Brake Hydraulic Repairs

🕲 – Wheel and Tire Mobile Service

- Tire Removal from Wheel
- Tire Balancing
- Tire Repair

Note: Specialize Mobile Service Mobile Service unit and equipment including Tire balancer and Tire Changer required.

Not Mobile Service Repair Capable

- Large component removal
- BEV Battery Replacement
- Requires a vehicle hoist to complete the repair (more than inspection)
- Required vehicle alignment
- Requires significant vehicle disassembly
- Repairs greater than 2-3 hours
- Any repairs that require M-Time
- Includes a service procedure where the vehicle owner may be distressed about the state of their vehicle

Ford Motor Company Recall Reimbursement Plan for 22S37

Ford and Lincoln dealers are in the best position to quickly and efficiently process reimbursement requests. However, federal legislation requires all motor vehicle manufacturers to establish processes through which customers may seek recall reimbursement directly from the manufacturer or from the dealers.

Regarding the specific reimbursement plan for Recall # 22S37, owners who have paid for service to remedy the defect or noncompliance must have had that service performed prior to June 24, 2022. After this date, if repairs related to this recall are performed by a non-Ford repair facility in an emergency situation, customers must submit any refund requests through their dealership. As required by this federal regulation, Ford Motor Company submitted the details of its latest General Recall Reimbursement Plan in a letter to the National Highway Traffic Safety Administration (NHTSA) in May 2021. The following is the text of that letter and the Plan:

General Recall Reimbursement Plan

(As submitted to the NHTSA)

Pursuant to the requirements set forth in 49 CFR Part 573 and Part 577 of the Code of Federal Regulations, Ford Motor Company (Ford) is submitting required information pertaining to our general reimbursement plan for the cost of remedies paid for by vehicle owners before they are notified of a related safety recall.

Set forth below is Ford's general plan to reimburse owners and purchasers for costs incurred for remedies in advance of notification of potential safely-related defects or noncompliances pursuant to Part 573.6 (c)(8)(i). This plan has not changed since our February 20, 2019 submission.

Reimbursement Notification

Ford's notice to a vehicle owner in accordance with 49 CFR Part 577 will indicate that Ford is offering a refund if the owner paid to have service to remedy the defect or noncompliance prior to a specified ending date. In accordance with Part 573.13 (c)(2), this ending date will be defined as a minimum of ten calendar days after the date on which Ford mailed the last of its Part 577 notifications to owners, and will be indicated in the specific reimbursement plan available to owners for an individual recall. This notice will direct owners to seek eligible reimbursement through authorized dealers or, at their option, directly through Ford at the following address:

Ford Motor Company P.O. Box 6251 Dearborn, MI 48121-6251

Ford notes that this rule allows for the identification of a beginning date for reimbursement eligibility. Under the rule, an owner who paid to remedy the defect or noncompliance prior to the identified beginning date would not be eligible for reimbursement. Ford generally has not established such a beginning date for reimbursement eligibility and does not presently anticipate changing this general policy. However, in any case where Ford determines a beginning date is appropriate, Ford will indicate that date in the owner notice. As permitted by 577.11(e), Ford may not include a reimbursement notification when all vehicles are well within the warranty period, subject to approval by the agency.

Costs to be Reimbursed

For vehicles, reimbursement will not be less than the lesser of:

- The amount paid by the owner for the remedy that specifically addressed and was reasonably necessary to correct the defect or noncompliance that is the subject of the recall, or
- The cost of parts for the remedy (to be no more than the manufacturer's list retail price for authorized part(s), plus associated labor at local labor rates, miscellaneous fees (such as disposal of waste) and taxes.

For replacement equipment, reimbursement will be the amount paid by the owner for the replacement item (limited by the amount of the retail list price of the defective or noncompliant item that was replaced, plus taxes, where the brand or model purchased by the owner was different than the brand or model that was the subject of the recall). If the item of motor vehicle equipment was repaired, the reimbursement provisions identified above for vehicles will apply.

Ford notes that costs incurred by the owner within the period during which Ford's original or extended warranty would have provided for a free repair of the problem will not be eligible for reimbursement, as provided by Part 573.13 (d)(1).

Entities Authorized to Provide Reimbursement

Ford will continue to use authorized dealers to reimburse owners under the specific reimbursement plans for a particular recall, and will encourage owners to pursue requests for reimbursement directly through dealers to expedite reimbursement. Ford will also provide a mailing address to which customers can, at their option, send requests for reimbursement directly to Ford, as previously noted. Requests for reimbursement sent directly to Ford may take up to 60 days to process. Whether the owner chooses to pursue reimbursement requests through a dealer or directly through Ford, the owner will be directed to submit the required documentation, upon which reimbursement eligibility will be determined.

Required Documentation

The reimbursement determination will depend upon the information provided by the customer. Consistent with Part 573.13 (d)(4) the following information must be submitted:

- Claimant name and address
- Vehicle make, model, and model year
- Vehicle identification number (VIN) and, for replacement equipment, a description of such equipment or, for tires, the model, size and TIN (DOT code)
- Identification of the recall number (either the Ford recall number or the NHTSA recall number)
- Identification of the owner of the recalled vehicle at the time that the pre-notification remedy was obtained
- An original receipt for the pre-notification remedy that includes a breakdown of the amount for parts, labor, other costs and taxes, including costs for the replacement item. Where the receipt covers work other than to address the recall or noncompliance, Ford may require the claimant to separately identify costs that are eligible for reimbursement.
- If the remedy was obtained during the warranty period, documentation indicating that the warranty was not honored or the warranty repair did not correct the problem related to the recall.

Failure to submit all of the above information may result in denial of the reimbursement request.

Additional Information

The Part 577 required owner notice will provide a toll-free telephone number through which specific information about the reimbursement plan can be requested from Ford. This general reimbursement plan will be incorporated into notifications pursuant to Part 573.6 by reference. Information specific to an individual recall also may be incorporated into the Part 573.6 notification.