

Chronology of Defect / Noncompliance Determination Provide the chronology of events leading up to the defect decision or test data for the noncompliance decision.

On November 26, 2024, an issue pertaining to incomplete software recall remedies was brought to Ford's Critical Concern Group (CCRG) for review. This issue was initially identified in a Quality Office forum, where an audit was requested for software part numbers applied to vehicles remedied under a sample of field service actions (FSAs). Initial review of three FSAs revealed insufficient data to confirm correct software application across all FSAs using the FDRS service tool. Further investigation was deemed necessary.

In December 2024, a cross-functional team was formed to audit all software FSAs that used the FDRS service tool, with its first focus being on safety and compliance FSAs. Templates were created to track software lineage part numbers. On

December 19, 2024, Ford informed NHTSA of this concern -- the service tool data confirmed that the software state on the service tool at the time of installation matches the FSA software release for most vehicles. However, there are vehicles that do not have a match between the software state on the service tool and the FSA software release. Ford discussed with NHTSA its plan to address the mismatched vehicles. In January 2025, the cross-functional team created database records to store all software lineage part numbers for previously launched FSAs. The team then began auditing the current software level for every VIN repaired under several previously launched FSAs. On

February 27, 2025, the cross-functional team completed the audit of 22S65 and brought the results to Ford's CCRG for review, concluding that 98.2% of the repairs conducted under 22S65 had the correct software installed. The team identified the specific vehicles that were recorded as receiving the remedy, but have software that does not remedy the safety defect.

On March 7, 2025, Ford's Field Review Committee reviewed the concern and approved a field action Ford is not aware of any reports of accident or injury related to this condition.