



Desi Ujkashevic, Global Director
Automotive Safety Office
Sustainability, Environment & Safety Engineering

Fairlane Plaza South, Suite 400
330 Town Center Drive
Dearborn, MI 48126-2738

June 8, 2018

Mr. Stephen Hench
Trial Attorney, Litigation & Enforcement
National Highway Traffic Safety Administration
1200 New Jersey Avenue, SE, Room W41-227
Washington, DC 20590

Dear Mr. Hench and Mr. Buretta:

Subject: Ford Motor Company Notice of Anticipated Shortage and Request for Extension for Certain Priority Group 5 - 9 Vehicles - Supplement

Pursuant to Paragraph 39 of the Agency's Third Amendment to the Coordinated Remedy Order (ACRO3) dated December 9, 2016, Ford Motor Company (Ford) respectfully requests an extension to the Supply & Launch Deadline for the following Priority Groups 5 - 9 vehicles as specified in Amended Annex A:

Priority Group	Model Year(s)	Make	Model	Inflator	Zone
5	2007-2009	Ford	Edge	PAB	A
5	2006-2009	Ford	Fusion	PAB	A
5	2007-2009	Lincoln	MKX	PAB	A
5	2006-2009	Lincoln	Zephyr/MKZ	PAB	A
5	2006-2009	Mercury	Milan	PAB	A
6	2010	Ford	Edge	PAB	A
6	2007-2008	Ford	Edge	PAB	Non-A
6	2010-2011	Ford	Fusion	PAB	A
6	2006-2008	Ford	Fusion	PAB	Non-A
6	2010	Lincoln	MKX	PAB	A
6	2007-2008	Lincoln	MKX	PAB	Non-A
6	2010-2011	Lincoln	Zephyr/MKZ	PAB	A
6	2006-2008	Lincoln	Zephyr/MKZ	PAB	Non-A
6	2010-2011	Mercury	Milan	PAB	A
6	2006-2008	Mercury	Milan	PAB	Non-A
7	2012	Ford	Fusion	PAB	A

Priority Group	Model Year(s)	Make	Model	Inflator	Zone
8	2009	Ford	Edge	PAB	B
8	2007-2008	Ford	Edge	PAB	C
8	2009	Ford	Fusion	PAB	B
8	2006-2008	Ford	Fusion	PAB	C
8	2009	Lincoln	MKX	PAB	B
8	2007-2008	Lincoln	MKX	PAB	C
8	2009	Mercury	Milan	PAB	B
8	2006-2008	Mercury	Milan	PAB	C
9	2010 - 2010	Ford	Edge	PAB	B
9	2009 - 2009	Ford	Edge	PAB	C
9	2009 - 2009	Ford	Fusion	PAB	C
9	2010 - 2010	Lincoln	MKX	PAB	B
9	2009 - 2009	Lincoln	MKX	PAB	C
9	2010 - 2010	Lincoln	Zephyr/MKZ	PAB	B
9	2009 - 2009	Mercury	Milan	PAB	C

(i) Explanation

Ford previously submitted extension requests for these priority groups on February 9, 2018, April 20, 2018, and May 14, 2018. As Ford indicated in those extension requests, there have been several development and supplier production setbacks that could affect part supply and launch timing. At the time of those previous extension requests, the overall impact that these setback would have on Ford's timing for vehicles assigned to Priority Groups 5 - 9 was unknown. Ford is submitting this updated extension request based on current estimated timing that accounts for these setbacks, summarized below, as well as Ford's and our supplier's efforts to recover from these setbacks:

- On March 26, 2018, an event occurred at Autoliv's Promontory, Utah inflator production facility that halted manufacturing operations. After working to determine root cause and instituting recommended preventative actions, Autoliv resumed production of airbag inflators for recalls on May 8, 2018.
- During Design Validation / Production Validation testing on the 2010-2012 MY Ford Fusion/Milan/MKZ airbag module, a stopper plate deformed during static deployment testing. The purpose of the stopper plate is to retain two airbag inflator spacer sleeves that are used to hold the replacement airbag inflator. A detailed engineering investigation was launched with Joyson Safety Systems, robustness actions were identified, and Ford estimates validation testing on a redesigned stopper plate will be completed by July 13, 2018.
- During Production Validation testing for the 2007-2010 MY Lincoln MKX, Joyson engineers identified a tear in the airbag cushion side panel due to an interaction with the instrument panel during static deployment. After evaluating several design alternatives, Joyson has identified airbag cushion fabric changes to address the testing issue. Joyson's estimated completion timing is July 20, 2018.

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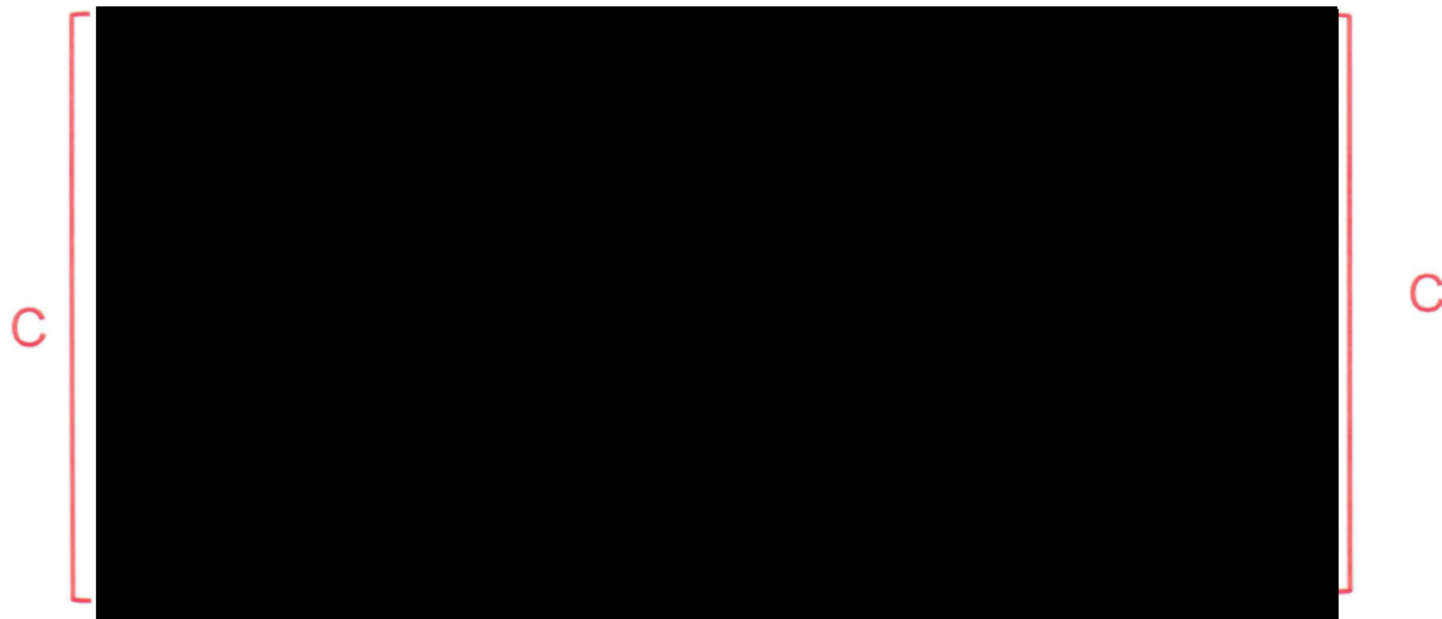
- On May 23, 2018, Joyson personnel observed a tear in the airbag cushion that occurred during static deployment tests as part of its production Lot Acceptance Testing (LAT) on a batch of production parts for the 2007-2010 MY Ford Edge. Joyson engineers continue to investigate the issue and are in the process of determining root cause for the LAT failure. Based on the latest information available, Joyson currently estimates this effort will be completed by June 29, 2018.

As a result of the above supplier setbacks and constraints, Ford recognizes that meeting certain owner notification dates, requested in our February 9, 2018 extension request, may not be possible. Ford is continuing to work with Joyson to correct the issues previously described and to optimize part production as quickly as possible. Ford notes that these supplier production issues have been communicated and discussed with the Agency and the Takata Independent Monitor in their regularly scheduled meetings in April and May 2018.

(ii) Remedy Part Selection, Validation, and Development Process

With the unprecedented urgency to provide service airbag inflators, Ford created a dedicated team of product development engineers, supported by service engineers, purchasing, and part supply and logistics staff to identify opportunities to reduce the time to bring inflator service parts to market. Under normal circumstances, manufacturers require several years to design, develop, and validate original equipment airbag modules. In contrast, to develop replacement Takata airbag inflator replacement parts, Ford developed innovative methods to reduce the time to provide service parts. A brief description of Ford's recall service part development and validation process is provided:





(iii) Sufficient Remedy Part Supply Sourcing

Ford has made a substantial effort to secure dual-stage passenger airbag inflator (APPS-7) production capacity from Autoliv, Inc. For Ford's service part needs, Autoliv is producing four different outputs of the APPS-7 inflator that are used in both inflator kits and airbag module assemblies.

In some instances, replacing the existing Takata airbag inflator with a new Autoliv inflator did not deliver acceptable performance, which required redesigning the airbag cushion and additional development and validation time. Ford secured module production capacity at Joyson Safety Systems that incorporates the redesigned airbag cushion.

(iv) Replacement Part Quantities

Ford is providing the number of affected vehicles and the number of replacement parts it reasonably believes will be available by the "Supply & Launch Deadline" for the affected Priority Group 9 vehicles in Appendix A.

(v) Extension Request Date

Ford is providing its extension request dates in Appendix B.

Ford is committed to continuing to work very closely with NHTSA and the Coordinated Remedy Monitor team to provide transparent and timely service part supply information on an ongoing basis for the numerous vehicle programs covered. Ford is submitting an updated extension request with specific timing for each vehicle program.

If you have any questions, please feel free to contact my office.

Sincerely,



for Desi Ujkashevic

Attachements

Declaration of Todd M. Fronckowiak

I, Todd M. Fronckowiak, declare as follows:

1. I am Assistant Director, Global Automotive Safety Compliance, Automotive Safety Office for Ford Motor Company.
2. I submit this Declaration in support of Ford's Notice of Anticipated Shortage and Request for Extension ("Extension Request") pursuant to Paragraph 39 of the Third Amendment to the Coordinated Remedy Order.
3. The contents of the Extension Request are accurate to the best of my knowledge, information, and belief.
4. I make no representation beyond these contained in this Declaration and, in particular, I make no representations as to whether this information my change in the future.

I state under penalty of perjury that the foregoing is true and correct.

Executed this eighth day of June, 2018.



T. M. Fronckowiak

Remedy Part Quantities

Priority Group	Model Year(s)	Make	Model	Inflator	Zone	Affected Vehicles	Sufficient Supply & Remedy Launch Deadline per ACRO5	Parts Available Per ACRO5
5	2007-2009	Ford	Edge	PAB	A	105,875	December 31, 2017	0 (0%)
5	2006-2009	Ford	Fusion	PAB	A	184,182	December 31, 2017	0 (0%)
5	2007-2009	Lincoln	MKX	PAB	A	31,711	December 31, 2017	0 (0%)
5	2006-2009	Lincoln	Zephyr/MKZ	PAB	A	41,555	December 31, 2017	0 (0%)
5	2006-2009	Mercury	Milan	PAB	A	36,697	December 31, 2017	0 (0%)
6	2010	Ford	Edge	PAB	A	43,053	January 31, 2018	0 (0%)
6	2007-2008	Ford	Edge	PAB	Non-A ⁽¹⁾	111,741	February 28, 2018	0 (0%)
6	2010-2011	Ford	Fusion	PAB	A	164,470	January 31, 2018	0 (0%)
6	2006-2008	Ford	Fusion	PAB	Non-A ⁽¹⁾	180,406	February 28, 2018	0 (0%)
6	2010	Lincoln	MKX	PAB	A	7,514	January 31, 2018	0 (0%)
6	2007-2008	Lincoln	MKX	PAB	Non-A ⁽¹⁾	30,626	February 28, 2018	0 (0%)
6	2010-2011	Lincoln	Zephyr/MKZ	PAB	A	18,387	January 31, 2018	0 (0%)
6	2006-2008	Lincoln	Zephyr/MKZ	PAB	Non-A ⁽¹⁾	42,299	February 28, 2018	0 (0%)
6	2010-2011	Mercury	Milan	PAB	A	12,613	January 31, 2018	0 (0%)
6	2006-2008	Mercury	Milan	PAB	Non-A ⁽¹⁾	48,103	February 28, 2018	0 (0%)
7	2012	Ford	Fusion	PAB	A	103,581	February 28, 2018	0 (0%)
8	2009	Ford	Edge	PAB	B	20,480	May 31, 2018	0 (0%)
8	2007-2008	Ford	Edge	PAB	C	48,506	June 30, 2018	0 (0%)
8	2009	Ford	Fusion	PAB	B	47,267	May 31, 2018	0 (0%)
8	2006-2008	Ford	Fusion	PAB	C	79,111	June 30, 2018	0 (0%)
8	2009	Lincoln	MKX	PAB	B	4,960	May 31, 2018	0 (0%)
8	2007-2008	Lincoln	MKX	PAB	C	13,269	June 30, 2018	0 (0%)
8	2009	Mercury	Milan	PAB	B	9,011	May 31, 2018	0 (0%)
8	2006-2008	Mercury	Milan	PAB	C	22,320	June 30, 2018	0 (0%)
9	2010 - 2010	Ford	Edge	PAB	B	53,381	June 30, 2018	0 (0%)
9	2009 - 2009	Ford	Edge	PAB	C	10,086	June 30, 2018	0 (0%)
9	2009 - 2009	Ford	Fusion	PAB	C	25,230	June 30, 2018	0 (0%)
9	2010 - 2010	Lincoln	MKX	PAB	B	9,471	June 30, 2018	0 (0%)
9	2009 - 2009	Lincoln	MKX	PAB	C	2,606	June 30, 2018	0 (0%)
9	2010 - 2010	Lincoln	Zephyr/MKZ	PAB	B	13,436	June 30, 2018	0 (0%)
9	2009 - 2009	Mercury	Milan	PAB	C	4,878	June 30, 2018	0 (0%)

⁽¹⁾ - NHTSA has clarified the definition of "Non-Zone A" as being Zone B.

Requested Supply and Launch Dates

Priority Group	Model Year(s)	Make	Model	Inflator	Zone	Sufficient Supply & Remedy Launch Deadline per ACRO5	Owner Letter Mailing Start Date Extension Request ⁽¹⁾
5	2007-2009	Ford	Edge	PAB	A	December 31, 2017	September 30, 2018
5	2006-2009	Ford	Fusion	PAB	A	December 31, 2017	September 30, 2018
5	2007-2009	Lincoln	MKX	PAB	A	December 31, 2017	October 31, 2018
5	2006-2009	Lincoln	Zephyr/MKZ	PAB	A	December 31, 2017	August 31, 2018
5	2006-2009	Mercury	Milan	PAB	A	December 31, 2017	September 30, 2018
6	2010	Ford	Edge	PAB	A	January 31, 2018	September 30, 2018
6	2007-2008	Ford	Edge	PAB	Non-A	February 28, 2018	September 30, 2018
6	2010-2011	Ford	Fusion	PAB	A	January 31, 2018	October 31, 2018
6	2006-2008	Ford	Fusion	PAB	Non-A	February 28, 2018	September 30, 2018
6	2010	Lincoln	MKX	PAB	A	January 31, 2018	October 31, 2018
6	2007-2008	Lincoln	MKX	PAB	Non-A	February 28, 2018	October 31, 2018
6	2010-2011	Lincoln	Zephyr/MKZ	PAB	A	January 31, 2018	September 30, 2018
6	2006-2008	Lincoln	Zephyr/MKZ	PAB	Non-A	February 28, 2018	August 31, 2018
6	2010-2011	Mercury	Milan	PAB	A	January 31, 2018	October 31, 2018
6	2006-2008	Mercury	Milan	PAB	Non-A	February 28, 2018	September 30, 2018
7	2012	Ford	Fusion	PAB	A	February 28, 2018	November 30, 2018
8	2009	Ford	Edge	PAB	B	May 31, 2018	September 30, 2018
8	2007-2008	Ford	Edge	PAB	C	June 30, 2018	September 30, 2018
8	2009	Ford	Fusion	PAB	B	May 31, 2018	November 30, 2018
8	2006-2008	Ford	Fusion	PAB	C	June 30, 2018	November 30, 2018
8	2009	Lincoln	MKX	PAB	B	May 31, 2018	October 31, 2018
8	2007-2008	Lincoln	MKX	PAB	C	June 30, 2018	October 31, 2018
8	2009	Mercury	Milan	PAB	B	May 31, 2018	November 30, 2018
8	2006-2008	Mercury	Milan	PAB	C	June 30, 2018 ⁽²⁾	November 30, 2018
9	2010 - 2010	Ford	Edge	PAB	B	June 30, 2018 ⁽²⁾	October 31, 2018
9	2009 - 2009	Ford	Edge	PAB	C	June 30, 2018 ⁽²⁾	October 31, 2018
9	2009 - 2009	Ford	Fusion	PAB	C	June 30, 2018 ⁽²⁾	November 30, 2018
9	2010 - 2010	Lincoln	MKX	PAB	B	June 30, 2018 ⁽²⁾	October 31, 2018
9	2009 - 2009	Lincoln	MKX	PAB	C	June 30, 2018 ⁽²⁾	October 31, 2018
9	2010 - 2010	Lincoln	Zephyr/MKZ	PAB	B	June 30, 2018 ⁽²⁾	September 30, 2018
9	2009 - 2009	Mercury	Milan	PAB	C	June 30, 2018 ⁽²⁾	November 30, 2018

⁽¹⁾ - These dates include additional contingency timing to account for minor unforeseen circumstances. As always, Ford will work to notify owners as quickly as possible.