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April 20, 2018

Ms. Arija Flowers
Trial Attorney, Litigation & Enforcement
National Highway Traffic Safety Administration
1200 New Jersey Avenue, S.E.
Washington, DC 20590

Dear Ms. Flowers:

Subject: Ford Motor Company Notice of Anticipated Shortage and Request for Extension

In accordance with Paragraph 39 of the Agency's December 9, 2016, Third Amendment to the Coordinated Remedy Order ("ACRO"), Ford Motor Company (Ford) is updating its request for an extension to the Supply & Launch Deadlines for certain vehicles in Priority Groups 5 - 8.

On February 11, 2018, Ford notified the Agency that owner notification letter mail dates may be delayed due to difficulties identified during production line validation trials and that Ford was in the process of determining the effect on its extension request dates. This letter amends Ford's February 9, 2018 extension request submission with updated timing.

(i) Explanation (Validation & Supply Updates)

2007-2010 MY Lincoln MKX

During recall service part design validation testing, Ford identified a tear in the airbag cushion due to interaction with the instrument panel during deployment. Ford and Takata are investigating several modifications to eliminate the condition, including revising the cushion folds or adding an extra layer of protective fabric. Presently Ford estimates that the validation testing of required countermeasures will be completed by May 11, 2018, and Ford has adjusted owner letter mailing dates accordingly. To minimize the effect of this delay on other vehicle lines, Ford has asked Takata to produce additional 2007 - 2010 MY Ford Edge passenger airbag modules during the time MKX module production was originally scheduled.

2006-2009 MY Lincoln MKZ

During production line validation trials, Takata identified a feature on the 2006 - 2009 MY Lincoln MKZ airbag module housing stamping that could damage the airbag cushion pack during the final module assembly process. Ford requested revisions to the airbag module housing to eliminate the risk of damage to the airbag cushion pack during assembly.

For both of these issues, Ford is working diligently with Takata to validate countermeasures and to minimize the impact of these delays.

- (ii) **Remedy Part Selection, Validation, and Development Process**
Ford's design, development, and validation process for the effected service parts has been previously provided to the Agency.
- (iii) **Sufficient Remedy Part Supply Sourcing**
Ford has secured dual stage airbag inflator production capacity from Autoliv and airbag module assembly capacity from Joyson Safety Systems (Takata) in order to manufacture updated passenger airbag modules with new Autoliv APPS-7 inflators.
- (iv) **Replacement Part Quantities**
Ford is providing the number of affected vehicles as reported in the January 19, 2018 Monitor Dashboard and the number of replacement parts it reasonably believes will be available by the "Supply & Launch Deadline" specified in the Fifth Amendment in Appendix A.
- (v) **Extension Request Date**
Ford is providing an update to the Requested Supply & Launch Dates in Appendix B.

Inflator Production Concerns

Additionally, as the Agency is aware, on March 26, 2018, a tragic event occurred on one of two mixing stations at Autoliv's Promontory, Utah, airbag inflator production facility. After halting manufacturing operations, Autoliv, in conjunction with multiple governmental agencies, began investigating the root cause of the event and determining prevent actions. It is Ford's understanding that Autoliv has resolved the issues identified during the investigation and has also purchased replacement mixing station equipment to allow resumption of manufacturing. Ford and Autoliv continue to evaluate this production disruption to existing plans and will keep the Agency apprised of any part supply or launch timing impacts as details become available.

If you have any questions concerning this response, please feel free to contact me.

Sincerely,



Desi Ujkashevic
Attachments

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 may change in the future.

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

Executed this Twentieth day of April, 2018.



T. M. Fronckowiak

Remedy Part Quantities

Priority Group	Model Year(s)	Make	Model	Inflator	Zone	Vehicles Affected	Sufficient Supply & Remedy Launch Deadline per ACRO5	Parts Available per ACRO5 Date
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%)
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%)
7	2012	Lincoln	Zephyr/MKZ	PAB	A	12,781	February 28, 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	Lincoln	Zephyr/MKZ	PAB	B	7,966	May 31, 2018	0 (0%)
8	2006-2008	Lincoln	Zephyr/MKZ	PAB	C	18,209	April 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 Position & (Zone)	ACRO5 Sufficient Supply & Remedy Launch Dates	Owner Letter Mailing Start Date Extension Request ⁽¹⁾
5	2007-2009	Lincoln	MKX PAB (A)	December 31, 2017	October 27, 2018
5	2006-2009	Lincoln	Zephyr/MKZ PAB (A)	December 31, 2017	August 10, 2018
6	2010	Lincoln	MKX PAB (A)	January 31, 2018	November 3, 2018
6	2007-2008	Lincoln	MKX PAB (Non-A)	February 28, 2018	November 10, 2018
6	2010-2011	Lincoln	Zephyr/MKZ PAB (A)	January 31, 2018	November 16, 2018
6	2006-2008	Lincoln	Zephyr/MKZ PAB (Non-A)	February 28, 2018	August 17, 2018
6	2012	Lincoln	Zephyr/MKZ PAB (A)	February 28, 2018	November 16, 2018
8	2009	Lincoln	MKX PAB (B)	May 31, 2018	November 3, 2018
8	2007-2008	Lincoln	MKX PAB (C)	June 30, 2018	November 10, 2018
8	2009	Lincoln	Zephyr/MKZ PAB (B)	May 31, 2018	August 24, 2018
8	2006-2008	Lincoln	Zephyr/MKZ PAB (C)	April 30, 2018	August 17, 2018

⁽¹⁾ These dates include some additional contingency timing to account for minor unforeseen circumstances. Ford will continue to work to launch final remedy parts as quickly as possible.