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October 11, 2017

Mr. Jeffrey M. Guiseppe
Acting Associate Administrator for Enforcement
National Highway Traffic Safety Administration
1200 New Jersey Avenue, S.E.
Room W48-302
Washington, DC 20590

Dear Mr. Guiseppe:

Subject: Ford Motor Company Notification Intention to Use the "Other Reasons" Category to Report Vehicle Counts for Ford Recall 15S21 / 15V-319

Pursuant to 49 U.S.C. § 30166(e), NHTSA requires affected vehicle manufacturers to submit complete and accurate biweekly recall completion update reports to the Agency and the Monitor. NHTSA also allows vehicle manufacturers to report vehicles that are determined to be unreachable for recall remedy due to export, theft, scrapping, failure to receive notification (return mail), or other reasons, as part of the regulator requirements in 49 CFR § 573.7(b)(5).

In accordance with Paragraph 45 of the Third Amendment to the Coordinated Remedy Order (ACRO3), the Agency permits manufacturers to count vehicles in the "other reasons" portion of the unreachable population counts when certain criteria are met:

- a) Vehicles in the particular recall campaign are at least five years of age measured from their production dates;
- b) A vehicle has not been registered in any state or territory, or has held an expired registration, for at least three continuous years; and
- c) At least one alternative, nationally recognized data sourced corroborates the vehicle is no longer in service.

As prescribed in Paragraph 47 of the ACRO3, Ford is explicitly notifying the Agency that it intends to use the "other" reporting category for the purposes of reporting vehicles that are unreachable for recall 15S21 / 15V-319. In the interest of obtaining a higher degree of accuracy in recall completion reporting and to focus its resources on remedy campaign vehicles at risk, Ford will also include reporting of vehicles that are determined to be scrapped, stolen, or exported in the Monitor Dashboard starting approximately October 13, 2017. Ford's 3rd party vendor has reviewed the vehicle population where the recall status is listed as open and the baseline results are summarized in the table provided.

Category	Number of Affected VINs
Exported	11,380
Scrapped	58,397
Stolen	1,311
Other	19,167

As described in Paragraph 46 of the ACRO3, Ford will remove from recall outreach efforts for vehicles counted in the "other" category, including renotifications; however, Ford will conduct required first class mailings pursuant to 49 CFR § 577.5. Consistent with Paragraph 48 of the ACRO3, Ford will maintain all VINs determined as "other" will reflect an open recall status on the NHTSA web tool, Ford website, and related networks to communicate safety recall status information.

Ford's use of the reporting will more accurately reflect vehicles that are still in-service and will enable Ford to concentrate its outreach efforts on these vehicles more effectively. If you have any questions concerning this response, please feel free to contact me.

Sincerely,



Wayne E. Bahr
Attachement