## 22S02

## **Chronology of Defect / Noncompliance Determination**

## Provide the chronology of events leading up to the defect decision or test data for the noncompliance decision.

In July of 2021, NHTSA inquired about 2015 model year Mustang Vehicle Owner Questionaries (VOQs) they had received related to brake stop lamps staying on when the brake pedal is not depressed.

On August 17, 2021, CCRG opened a formal investigation into this matter.

Ford and NHTSA have been reviewing the progress of this investigation monthly since August.

As of November 16, 2021, there were 615 warranty claims in the U.S., and 37 NHTSA VOQs alleging the brake lamps stay on continuously as a result of the brake pedal "stop bumper" disintegrating and falling off on 2014 through 2015 model year Fusion, MKZ, and 2015 model year Mustang vehicles. The brake pedal stop bumper contacts the stop lamp switch plunger allowing it to turn the stop lamps on and off properly. An automatic transmission vehicle with a missing brake pedal stop bumper can be started or shifted out of Park without depressing the brake pedal. Normal service braking is not affected.

In January 2015, the Tier 2 brake pedal stop bumper supplier made a robustness action to the raw material allowing the use of virgin rubber only and prohibiting the use of regrind material for manufacturing the stop bumper. There is no trend of related warranty claims on vehicles built with this revised material. No quality issues were identified at the supplier; however the investigation is ongoing.

Although the root cause is still under investigation; field data and preliminary field part analysis suggests that environmental conditions cause the bumper material to degrade and fail. The investigation has identified higher failure rates in states with higher temperatures, humidity, and salinity (Texas through Virginia coastal areas, and Hawaii) in 2015 model year Mustang (5.4 R/1000) and 2014 through 2015 model year Fusion and MKZ vehicles (2.6 R/1000). The current rate in all other U.S. states is very low (< 0.10 R/1000). Ford's investigation into the root cause of this issue is ongoing.

Based on the data above a safety recall is recommended for the 2014 through 2015 model year Fusion, MKZ, and the 2015 model year Mustang, in southern coastal states, and Hawaii that are currently demonstrating high failure rates.

On January 7, 2022, Ford's Field Review Committee reviewed the concern and approved a field action.

Our investigation did not identify any accidents or injuries pertaining to this subject on these vehicles.

Ford is providing a customer satisfaction program for vehicles not sold or registered in southern coastal states and Hawaii.