

CENTER FOR AUTO SAFETY

1825 CONNECTICUT AVENUE NW SUITE 330 WASHINGTON DC 20009-5708
202-328-7700 ◆ www.autosafety.org

July 26, 2012

The Honorable David L. Strickland, Administrator
National Highway Traffic Safety Administration (NHTSA)
1200 New Jersey Ave. SE
Washington, DC 20590

Dear Administrator Strickland,

After covering up a defective cruise control cable in 2001-04 Ford Escapes since 2005, Ford Motor Co. ("Ford") submitted a deceptive Part 573 Defect Recall Report which says not one word about the cruise control cable being defective. Instead Ford describes the defect as "inadequate clearance between the engine cover and the speed [cruise] control cable connector." If the cruise control cable guide doesn't break, there is adequate clearance and there won't be a stuck throttle such as killed Saige Bloom in Payson AZ on January 27, 2012. Ford's remedy is to have the rear stand-off fastener for the engine cover replaced, in an effort to raise the engine cover in the area of the cruise control cable to provide adequate clearance. (See Ford Part 573 at http://www.autosafety.org/sites/default/files/imce_staff_uploads/Ford%20Escape%2012S37%20Part%20573.pdf)

Ford's defect description and remedy have one purpose, and one purpose only, to avoid a civil penalty being imposed by NHTSA for failing to do a timely recall in 2005 when Ford discovered the cruise control cable guide would break and the cable connector would jam against the engine cover resulting in a struck throttle. Replacing the defective cruise control cable eliminates the defect and the need for more clearance. Indeed, it is not even clear that the additional clearance proposed by Ford would prevent stuck throttles.

Ford has a history of presenting insufficient recall remedies which NHTSA has rejected. In 1978, former Administrator Joan Claybrook rejected the original Pinto fuel tank remedy and required a substantially upgraded remedy. (See Pinto Part 573 at http://www.autosafety.org/sites/default/files/imce_staff_uploads/Pinto%20Recall.pdf)

The Center for Auto Safety (CAS) requests that NHTSA reject both the remedy and the Part 573 submitted by Ford. CAS requests NHTSA to continue its investigation and find the cruise control cable in all 2001-04 to be defective and impose the maximum civil penalty on Ford for not recalling these vehicles in 2005.

Respectfully submitted,



Michael Brooks
Staff Attorney