



U.S. Department
of Transportation

National Highway
Traffic Safety
Administration

Part 573 Safety Recall Report

25E042

Manufacturer Name: Ford Motor Company

Submission Date: Jun 27, 2025

NHTSA Recall No.: 25E042

Manufacturer Recall No.: 25S73

Manufacturer Information

Population

Manufacturer Name: Ford Motor Company

Address: 330 Town Center Drive
Suite 500
Dearborn MI, 48126-2738

Total number of potentially involved: 4

Estimated percentage with defect: 100%

Equipment Information

Brand / Trade 1: FORD ACCESSORY PARTS

Model: F-150 TRAILER BRAKE CTRL

Part Number: ML3Z-19H332-*A

Type:

Function:

Size:

Production Dates: Oct 12, 2020 - Mar 07, 2022

Number of potentially involved: 4

Descriptive Information:

Trailer brake controllers sold as accessory parts "Over-The-Counter" (OTC) for '21-'22 MY F-150 vehicles.

Defect / Noncompliance Description

Description of the defect or noncompliance:

According to Ford's records, certain 2015 MY F-150 and 2021 MY F-150 vehicles did not have the remedy for Safety Recall 22S38 / 22E-045 installed correctly, but were recorded as having the repair successfully completed. Because the correct software update remedy may not be installed on the vehicle, the underlying condition specified in Safety Recall 22S38 / 22E-045 may still exist, and trailer brake controllers that were sold as accessory parts "Over-The-Counter" (OTC) for '21-'22 MY F-150 vehicles may not properly apply the trailer brakes when towing a trailer equipped with an electric or electric-over-hydraulic brake system.

FMVSS1:

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25E042**FMVSS2:****Description of the safety risk, including crash, fire, death, injury:**

The underlying safety risk specified in Safety Recall 22S38 / 22E-045 still exists on these specified vehicles. Ford described that safety risk as, "Loss of trailer brake functionality could result in extended stopping distance, increasing the risk of a crash."

Description of the cause:

The dealer instructions to complete the recall instruct the technician to upload the latest software using the service tool, which downloads the latest software from Ford for installation on the vehicle. For these vehicles, the software tool did not upload the correct software to the vehicle.

Identification of any warning that can occur:

None

Component Manufacturer

Tier of Supplier:

Supplier Type: OEM

Name: Ford Motor Company

Address: 1 American Road
Dearborn MI, 48126

Country: United States

Involved Components

Component Name 1: KIT - TRLR BRK

Component Description: F-150 2021-2022 Trailer Brake Control

Component Part Number: ML3Z-19H332-AA

Component Name 2: KIT - TRLR BRK

Component Description: F-150 2021-2022 Trailer Brake Control

Component Part Number: ML3Z-19H332-BA

Component Name 3: KIT - TRLR BRK

Component Description: F-150 2021-2022 Trailer Brake Control

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25E042**Component Part Number:** ML3Z-19H332-CA

Purchaser Information

The following manufacturers purchased this defective/noncompliant equipment for possible use or installation in new motor vehicles or new items of motor vehicle equipment:

Name:**Address:****Country:**

Chronology

On **November 26, 2024**, an issue pertaining to incomplete software recall remedies was brought to Ford's Critical Concern Group (CCRG) for review. This issue was initially identified in a Quality Office forum, where an audit was requested for software part numbers applied to vehicles remedied under a sample of field service actions (FSAs). Initial review of three FSAs revealed insufficient data to confirm correct software application across all FSAs using the FDRS service tool. Further investigation was deemed necessary.

In **December 2024**, a cross-functional team was formed to audit all software FSAs that used the FDRS service tool, with its first focus being on safety and compliance FSAs. Templates were created to track software lineage part numbers.

On **December 19, 2024**, Ford informed NHTSA of this concern -- the service tool data confirmed that the software state on the service tool at the time of installation matches the FSA software release for most vehicles. However, there are vehicles that do not have a match between the software state on the service tool and the FSA software release. Ford discussed with NHTSA its plan to address the mismatched vehicles.

In **January 2025**, the cross-functional team created database records to store all software lineage part numbers for previously launched FSAs. The team then began auditing the current software level for every VIN repaired under several previously launched FSAs.

On **June 16, 2025**, the cross-functional team completed the audit of 22S38 and brought the results to Ford's CCRG for review, concluding that 95% of the repairs conducted under 22S38 had the correct software installed. The team identified the specific vehicles that were recorded as receiving the remedy, but has software that does not remedy the safety risk.

On **June 20, 2025**, Ford's Field Review Committee reviewed the concern and approved a field action. Ford is not aware of any reports of accident or injury related to this condition.

Related NHTSA Recall Number: 22S38

Description of Remedy

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Remedy Type: Software

Consumer Advisories: ☐ Do Not Drive ☐ Park Outside

Description of remedy program:

Owners will be notified by mail and instructed to take their vehicle to a Ford or Lincoln dealer to have the Integrated Trailer Brake Control Module software updated. Then, the software part numbers will be validated using the Software Validation Form in the Professional Technician System before the FSA is closed. There will be no charge for this service.

Ford provided the general reimbursement plan for the cost of remedies paid for by vehicle owners prior to notification of a safety recall in May 2023. Owners who have paid to have these repairs completed at their own expense may be eligible for reimbursement, in accordance with the recall reimbursement plan on file with NHTSA.

Letters will be sent to the dealer principals of the dealerships that ordered the suspect parts for which there is no traceability. Dealerships will be required to contact customers that purchased the service cylinder head assemblies or long block assemblies over-the-counter or had the assemblies installed at a dealer with instructions to return the part for a full refund or to take their vehicle to a Ford or Lincoln dealer to have the cylinder head assembly serial number inspected. There will be no charge for this service.

How remedy component differs from recalled component:

The software service package will have the intended remedy for 22S38 / 22E-045

Identify how/when recall condition was corrected in production:

Not required per 49 Part 573.

Reimbursement Plan

Manufacturer used general reimbursement plan on file.

Recall Schedule

Description of recall schedule:

Notification to dealers is expected to occur on August 7, 2025. Mailing of remedy owner notification letters is expected to begin August 7, 2025, and is expected to be completed by August 11, 2025.

Planned Dealer Notification Date: Aug 07, 2025 - Aug 07, 2025 ☐ No Dealers

Planned Interim Owner Notification Date: ☐ No Owners

Planned Remedy Owner Notification Date: Aug 07, 2025 - Aug 11, 2025 ☐ Phased Recall