



DEPARTMENT OF TRANSPORTATION

National Highway Traffic Safety Administration

[Docket No. NHTSA-2026-0925]

Denial of Motor Vehicle Defect Petition, DP25-001

AGENCY: National Highway Traffic Safety Administration (NHTSA), Department of Transportation

ACTION: Denial of a petition for a defect investigation

SUMMARY: This notice sets forth the reasons for the denial of a defect petition (DP25-001) submitted by Mr. Luis Armando Vega on August 14, 2025, requesting that the Agency initiate a safety defect investigation into premature degradation and detachment of the plastic underbody shields on Model Year (MY) 2020 Ford Explorer vehicles manufactured by Ford Motor Company. After conducting a technical review of the petition and other information, NHTSA's Office of Defects Investigation has concluded that the issues raised by the petition do not warrant a defect investigation at this time. Accordingly, the Agency has denied the petition.

FOR FURTHER INFORMATION CONTACT: Jayson Winick, Vehicle Defect Division C, Office of Defects Investigation, NHTSA, 1200 New Jersey Avenue, SE, Washington, DC, 20590. Telephone: 202-699-6480. Email: jayson.winick@dot.gov.

SUPPLEMENTARY INFORMATION:

INTRODUCTION

Interested persons may petition NHTSA requesting that the Agency initiate an investigation to determine whether a motor vehicle or an item of replacement equipment does not comply with an applicable motor vehicle safety standard or contains a defect that relates to motor vehicle safety. 49 U.S.C. § 30162(a)(2); 49 CFR § 552.1. Upon receipt of a properly filed petition, the Agency conducts a technical review of the petition, material submitted with the petition and any additional information. 49 U.S.C. § 30162(a)(2); 49 CFR § 552.6. The technical review may

consist solely of a review of information already in the possession of the Agency or it may include the collection of information from a motor vehicle manufacturer and/or other sources. After conducting the technical review and considering appropriate factors, which may include, but are not limited to, the nature of the complaint, allocation of Agency resources, Agency priorities, the likelihood of uncovering sufficient evidence to establish the existence of a defect and the likelihood of success in any necessary enforcement litigation, the Agency will grant or deny the petition. *See* 49 U.S.C. § 30162(a)(2); 49 CFR § 552.8.

BACKGROUND INFORMATION

The Office of Defects Investigation (ODI) received a petition dated August 14, 2025, requesting a defect investigation into an alleged defect of the "underbody shields" on the following vehicle model stated by the petitioner: MY 2020 Ford Explorer. The petition itself can be reviewed at [NHTSA.gov](https://www.nhtsa.gov) under ODI number 11682326.

SUMMARY OF PETITION

The petition alleges premature degradation and sagging/loosening of the underbody shields, even under normal usage conditions, potentially resulting in road debris if they were to detach completely. The Petitioner also alleged excessive noise and vibration while driving that progressively worsened over time, along with visible sagging of the shields underneath the vehicle.

OFFICE OF DEFECTS INVESTIGATION ANALYSIS

An analysis of the subject vehicle population was undertaken using complaints submitted to ODI. No related complaints were found in NHTSA's database for the subject vehicle population. Subsequently, ODI conducted a broader search for related complaints and field reports involving MY 2020-2025 Ford Explorer and Lincoln Aviator models, as these vehicles all utilize substantially similar underbody shields. No complaints or reports were found citing any allegations pertaining to any of the underbody shields.

Correspondingly, ODI reviewed manufacturer information and data and did not identify a trend related to the Petitioner's allegations.

After a thorough review of the materials submitted by the Petitioner and other relevant information available to the Agency, NHTSA has not identified sufficient evidence of a vehicle-based defect pertaining to the underbody shields of the subject vehicle. It is noteworthy that the Petitioner alleged the presence of detectability pertaining to this condition, including excessive noise and vibration while driving that progressively worsened over time, and visible sagging of the shields underneath the vehicle. ODI's findings are that there is a low risk of a complete detachment or a projectile hazard related to this condition. Consequently, this petition is denied. The Agency reserves the right to take additional action if warranted by future circumstances.

Authority: 49 U.S.C. 30162(d) and 49 CFR Part 522; delegation of authority at 49 CFR 1.95(a).¹

Eileen Sullivan,

Associate Administrator for Enforcement.

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¹ The authority to determine whether to approve or deny defect petitions under 49 U.S.C. § 30162(d) and 49 CFR Part 552 has been further delegated to the Associate Administrator for Enforcement.