

[REDACTED]
[REDACTED] St. Lighthouse Point, FL [REDACTED]

Email: [REDACTED]

Cell: [REDACTED]

February 25, 2025

National Highway Traffic Safety Administration (NHTSA)
1200 New Jersey Avenue, SE
Washington, DC 20590

Subject: Request for Hearing Regarding Recall #23V637 Non-Compliance

Dear Sirs:

On January 28, 2025, I filed an online complaint #11639036 with you regarding Jaguar Land Rover of North America's (JLRNA) failure to comply with mandated Recall #23V637 concerning my 2019 Jaguar I-Pace (VIN: [REDACTED]). During a follow-up call with your office on February 5, I emphasized the urgent nature of my complaint due to the safety risk at hand and attempted to clarify that this was not a new complaint, but regarding an existing recall. Yet, I have not received any form of response from your office over these last 4 weeks. Therefore, I am submitting this letter via certified mail/return receipt to ensure official acknowledgment of my complaint.

Summary of Non-Compliance:

Jaguar Land Rover North America (JLRNA) is in violation of U.S. Code Title 49, Subtitle VI, Part A, Chapter 301, Subchapter II, Section 30120, specifically regarding the unreasonable delay in remedying Recall #23V637, issued on November 18, 2024. Per the recall notice, JLRNA committed to reacquiring affected vehicles, including mine. Despite my full compliance with all necessary recall-mandated steps, JLRNA has failed to provide the required remedy, nor have they processed any payment or reacquisition of my vehicle.

Section 30120 of the statute states:

- **(2) Failure to repair a motor vehicle or replacement equipment adequately within 60 days after its presentation is prima facie evidence of failure to repair within a reasonable time.**
- **(3) If the Secretary determines that a manufacturer's remedy program is not likely to be completed within a reasonable time, the Secretary may require the manufacturer to accelerate the remedy program if there is a risk of serious injury or death.**

Since the recall was issued over 90 days ago, and JLRNA has not complied with its obligations, I am requesting that the Secretary of Transportation conduct a hearing to determine whether JLRNA has met the reasonable remedy requirements under

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§30120. The delay in compliance has placed my family and me at significant risk due to the fire hazard associated with this defect.

Requested Actions:

1. **Immediate investigation** into JLRNA's failure to comply with Recall #23V637.
2. **A formal hearing** to determine whether JLRNA has met the reasonable remedy requirements under §30120.
3. **Enforcement action** to compel JLRNA to fulfill its legal obligation without further delay.

I request written confirmation of your receipt of this complaint and an update on the next steps within 14 days of this letter's delivery. Please contact me at your earliest convenience regarding the status of this matter.

Sincerely,



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