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**VIA UPS**

February 21, 2005

Thomas Z. Cooper, Chief  
Vehicle Integrity Division  
Office of Defects Investigation  
National Highway Traffic Safety Administration  
400 Seventh Street, S.W.  
Washington, D.C. 20590

Porsche Cars North America, Inc.

980 Hammond Drive  
Suite 1000  
Atlanta, Georgia 30328  
(770) 290-3500 Fax: (770) 290-3700

RE: Comparative Assessment (NYS-212-pco / PE04-081)

Dear Mr. Cooper:

This letter is in response to your letter dated January 19, 2005. Attached are our responses to the requested information in the format specified in the letter.

Should you have any additional questions please do not hesitate to contact me at (770) 290-3627.

Sincerely,

Walter J. Lewis, Manager  
Regulatory Affairs

Enclosures

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- I. State, by model and model year, the number of subject peer vehicles Porsche has manufactured for sale or lease in the United States. If there are multiple side airbag system designs or versions for a given subject peer vehicle, please identify under section "e". Separately, for each model subject peer vehicle manufactured to date by Porsche, state the following:
- a. Vehicle identification number (VIN);
  - b. Make;
  - c. Model;
  - d. Model Year;
  - e. Airbag system model version (if more than one);
  - f. Date of manufacturer;
  - g. Date warranty coverage commenced; and
  - h. The State in the United States where the vehicle was originally sold or leased (or delivered for sale or lease).

Provide the table in Microsoft Access 2000, or a compatible format, entitled "PRODUCTION DATA."

1. The following table list the number of subject peer vehicles Porsche has sold or leased in the United States:

<b>Model Year</b>	<b>Model</b>	<b>U.S. Sales</b>
2001	Boxster	7,658
	Boxster S	5,475
	911 Carrera	2,419
	911 Carrera Cabriolet	3,514
	911 Carrera 4	908
	911 Carrera 4 Cabriolet	1,382
	911 Turbo	2,856

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<b>Model Year</b>	<b>Model</b>	<b>U.S. Sales</b>
2002	Boxster	5,880
	Boxster S	4,296
	911 Carrera	2,405
	911 Carrera Cabriolet	3,658
	911 Targa	603
	911 Carrera 4S	1,371
	911 Carrera 4 Cabriolet	1,537
	911 GT2	176
	911 Turbo	2,376
2003	Boxster	4,781
	Boxster S	3,126
	911 Carrera	1,861
	911 Carrera Cabriolet	2,514
	911 Targa	546
	911 Carrera 4S	1,938
	911 Carrera 4 Cabriolet	1,105
	911 Turbo	1,983
911 GT2	118	

Enclosed is a CD that contains the requested file (filename: PRODUCTION DATA.xls). The Excel file contains two worksheets, one for the Boxster models (986) and one for the 911 models (996). Each worksheet lists the VINs, make, model year, model, manufacturing date (format YYYYMMDD), date warranty coverage commenced (format YYYYMMDD) and the state where the vehicle was originally sold, for each of the subject peer vehicles. Please note that the side airbag systems are basically identical for all of the subject peer vehicles.

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2. State the number of each of the following, received by Porsche, or of which Porsche is otherwise aware, which relate to, or may relate to, the subject condition in the subject peer vehicles:
- a. Consumer complaints, including those from fleet operators;
  - b. Field reports, including dealer field reports;
  - c. Reports involving a crash, injury, or fatality, based on claims against the manufacturer involving death or injury, notices received by the manufacturer alleging or proving that a death or injury was caused by a possible defect in a subject vehicle, property damage claims, consumer claims, or field reports;
  - d. Property damage claims (including own vehicle); and
  - e. Third-party arbitration proceeding where Porsche is or was a party to the arbitration; and
  - f. Lawsuits, both pending and closed, in which Porsche is or was a defendant or codefendant.

For subparts "a" through "d", state the total number of each item (e.g., consumer complaints, field reports, etc.) separately. Multiple incidents involving the same vehicle are to be counted separately (i.e., a consumer complaint and a field report involving the same incident in which a crash occurred are to be counted as a crash report, a field report and a consumer complaint). Identify reports that have a duplicate with either other mfg reports/claims or with ODI.

In addition, for items "b" through "f", provide a summary description of the alleged problem and causal and contributing factors and Porsche's assessment of the problem, with a summary of the significant underlying facts and evidence along with any photographs and airbag control module diagnostic result/readout/printout (along with explanation/description). For items f and g, identify the parties to the action, as well as the caption, court, docket number, and date on which the complaint or other document initiating the action was filed.

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2.a. Consumer Complaints

Porsche Cars North America, Inc. is not aware of any consumer complaints regarding the subject condition in the subject peer vehicles.

2.b. Field Reports

Porsche Cars North America, Inc. is not aware of any field reports regarding the subject condition in the subject peer vehicles.

2.c. Crash/Injury/Fatality Reports

Porsche Cars North America, Inc. is not aware of any crash, injury or fatality reports regarding the subject condition in the subject peer vehicles.

2.d. Property Damage Claims

Porsche Cars North America, Inc. is not aware of any property damage claims regarding the subject condition in the subject peer vehicles.

2.e. Arbitration Proceedings

Porsche Cars North America, Inc. is not aware of any arbitration proceedings regarding the subject condition in the subject peer vehicles.

2.f. Lawsuits

Porsche Cars North America, Inc. is not aware of lawsuits regarding the subject condition in the subject peer vehicles.

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3. State, by model and model year, the number and total count for all of the following categories of claims, collectively, that have been paid by Porsche to date that relate to, or may relate to, the subject condition in the subject peer vehicles: warranty claims; extended warranty claims; claims for goodwill services that were provided; field, zone, or similar adjustments and reimbursements; and warranty claims or repairs made in accordance with a procedure specified in a technical service bulletin or customer satisfaction campaign.

Provide this information in Microsoft Excel table, or compatible format, entitled "WARRANTY DATA COUNT."

3. Porsche Cars North America, Inc. is not aware of any warranty, goodwill or similar claims regarding the subject condition in the subject peer vehicles.

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4. Describe in detail the search criteria used by Porsche to identify the claims identified in response to Request No. 3, including the labor operations, problem codes, part numbers and any other pertinent parameters used. Provide a list of all labor operation descriptions, problem codes, and problem code descriptions applicable to the subject condition in the subject peer vehicles. State, by make and model year, the terms of the new vehicle warranty coverage offered by Porsche on the subject peer vehicles (i.e., the number of months and mileage for which coverage is provided and the vehicle systems that are covered) and if it covers inadvertent side-airbag deployments (without an actual side crash, but sensors did sense a shock pulse). Describe any extended warranty coverage option(s) that Porsche offered for the subject peer vehicles and state by option, model, and model year, the number of vehicles that are covered under such extended warranty and if it covers inadvertent side-airbag deployments.

#### 4.1. Search Criteria for Request No.3

We searched the relevant Porsche databases for warranty or goodwill for the subject condition in the subject peer vehicles. The first search was through the warranty database system. The criteria used were for claims involving the model year 2001 to 2003 Porsche sports cars and the actual relevant part numbers for the left and right side airbag modules. The second search was through our customer complaint database system. The criteria used were for complaints involving model year 2001 to 2003 Porsche sports cars and either of the phrases: "side airbag" or "side air bag".

#### 4.2 Labor Operation Descriptions, Problem Codes, Part Numbers

Part Identifiers (generic part description used in the warranty system):

69 63 = Left Side Airbag  
69 64 = Right Side Airbag

Part Numbers:

996 803 091 00 = Left Side Airbag  
996 803 092 00 = Right Side Airbag

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## Warranty Labor Operation Codes:

69 63 20 50 = Side Airbag Removed and Reinstalled  
69 01 00 00 = Airbag (module) Diagnosis, Reading Fault Memory and  
Clearing

### 4.3 Warranty Coverage

The Warranty for all components of the subject peer vehicles (except wear items) is 4 years or 50,000 miles. This includes components related to the supplemental restraint system. Porsche does not cover accidents or other incidents. With regard to goodwill: Porsche reviews each situation on a case by case basis and depending on the time and mileage outside of the warranty (and the nature of the failure), the owner is eligible (or not) for consideration. We have no written policy for inadvertent airbag deployment.



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5. Provide a table showing the following information concerning the side-impact airbag systems in the subject peer vehicles by model and model year:
  - a. type of side air bag system (thorax, head, curtain or combination thereof);
  - b. location of each seating position at which a side airbag system is installed;
  - c. the number of side air bags at each of those seating positions; and
  - d. bag location (seat mounted, door mounted, etc.)
  
5. All of the subject peer vehicles (see the table in the response to Request No.1) contain the same type of side airbag system. The system is a single combination head/thorax bag that is door mounted and provided as standard equipment for the driver and front passengers only.

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6. For each model, model year of the subject near vehicles, identify the supplier of the side-impact crash sensing system and electronic restraint module. Please provide a complete street address, contact name, and telephone number for each supplier identified.

6.1. The supplier for all of Porsche's crash sensing systems is:

Mr. Wolfgang Peter  
Conti Temic Microelectronic GmbH  
Product Line Occupant Safety  
Ringlerstrasse 17  
85057 Ingoldstadt  
Germany

Tel. No. 011 49 841 8810

6.2. The supplier for all of Porsche's electronic restraint module is:

Will be forwarded as soon as possible.