



Buff
2/28/06

2006 FEB 23 A 10:47

VIA UPS
February 13, 2006

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

BEI 201 2006-02-23 10:47
Porsche Cars North America, Inc.
980 Hammond Drive
Suite 1000
Atlanta, Georgia 30328
(770) 290-3500 Fax: (770) 290-3700

RE: Preliminary Evaluation (NVS-212-pco / PE05-060)

Dear Mr. Cooper:

This letter is in response to your letter dated November 17, 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

PORSCHE

NHTSA – NVS-212-pcd / PE05-060

February 13, 2006

Section 1, Page 1

- I. State, by model and model year, the number of subject peer Porsche has manufactured for sale or lease in the United States. Separately, for each model subject peer vehicle manufactured to date by Porsche, state the following:
- a. Make:
 - b. Model:
 - c. Model Year:
 - d. Vehicle Identification Number (VIN).
 - e. Date of manufacture (in dd/mm/yyyy date format):
 - f. Date warranty coverage commenced (in dd/mm/yyyy date format); and
 - g. 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."

Enclosed is a CD containing a Microsoft Access database (file name: "PRODUCTION DATA.mdb") that contains three tables, the data extract for which was run on January 10, 2006. The first "Vehicles Assigned" table lists all the cars actually wholesaled to dealers. If the car (VIN) listed does not have a warranty start date, this means it was still in dealer inventory. The State listed is the state of the selling dealer or of the dealer who has the car in inventory. The "Vehicle manufactured" table shows the total number of Cayenne vehicles (all versions) produced by model year. The "Vehicles Not Assigned" are cars not yet to be wholesaled to dealers. Some have warranty start dates that indicates they are in Company Car use.

PORSCHE

NHTSA – NVS-212-pco / PE05-060
February 13, 2006
Section 2, Page 1

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. Multiple reports of the same incident are also 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.

PORSCHE

NHTSA – NVS-212-pco / PE05-060

February 13, 2006

Section 2, Page 2

2.a. Consumer Complaints

Will be forwarded as soon as possible.

2.b. Field Reports

Will be forwarded as soon as possible.

2.c. Crash/Injury/Fatality Reports

Will be forwarded as soon as possible.

2.d. Property Damage Claims

Will be forwarded as soon as possible.

2.e. Arbitration Proceedings

Will be forwarded as soon as possible.

2.f. Lawsuits

Will be forwarded as soon as possible.

PORSCHE

NHTSA - NVS-212-pco / PE05-060

February 13, 2006

Section 3, Page 1

3. Separately, for each item (complaint, report, claim, notice, or matter) within the scope of your response to Request No. 2, state the following information:
- a. Porsche's file number or other identifier used;
 - b. The category of the item, as identified in Request No. 2 (i.e., consumer complaint, field report, etc.);
 - c. Vehicle owner or fleet name (and fleet contact person), address, and telephone number;
 - d. Vehicle's VIN;
 - e. Vehicle's make, model, and model year;
 - f. Vehicle's mileage at the time of incident;
 - g. Incident date (in "dd/mm/yyyy" date format);
 - h. Report or claim date (in "dd/mm/yyyy" date format);
 - i. Whether a crash is alleged;
 - j. Whether property damage is alleged;
 - k. Number of alleged injuries, if any;
 - l. Number of alleged fatalities, if any.

Provide this information in Microsoft Access 2000, or a compatible format, entitled "REQUEST NUMBER TWO DATA."

3. Will be forwarded as soon as possible.

PORSCHE

NHTSA – NVS-212-pco / PE05-060

February 13, 2006

Section 4, Page 1

4. Produce copies of all documents related to each item within scope of Request No. 2. Organize the documents separately by category (i.e., consumer complaint, field reports, etc.) and describe the method Porsche used for organizing the documents.

4. Will be forwarded as soon as possible.

PORSCHE

NHTSA – NVS-212-pco / PE05-060
February 13, 2006
Section 5, Page 1

5. State, by model and model year, a total count for all the following categories of claims, collectively, that have been paid by Porsche to date that relate to, or may relate to, the alleged defect in the subject 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.

Separately, for each such claim, state the following information:

- a. Porsche's claim number;
- b. Vehicle owner or fleet name (and fleet contact person) and telephone number;;
- c. VIN;
- d. Repair date (in "dd/mm/yy" date format);
- e. Vehicle mileage at time of repair;
- f. Repairing dealer's or facility's name, telephone number, city and state or ZIP code;
- g. Labor operation number;
- h. Problem code;
- i. Replacement part number(s) and description(s);
- j. Concern stated by customer; and
- k. Comment, if any, by dealer/technician relating to claim and/or repair.

Provide this information in Microsoft Access 2000, or a compatible format, entitled "WARRANTY DATA."

5. Enclosed is a CD containing a Microsoft Excel spreadsheet (file name "WARRANTY DATA.xls") that contains the requested information (please note our warranty system does not have access to customer data and for this reason the spreadsheet does not contain this information). The following table describes the information contained in each of the columns contained in the file:

Column Heading	Data	Comment
Dealer	Dealer number	Designation by Porsche to identify dealer
DealerDesc	Dealership name	
City	Dealer city location	
State	Dealer state location	
Zip	Dealer zipcode	
Phone	Dealer telephone number	

PORSCHE

NHTSA - NVS-212-pco / PE05-060

February 13, 2006

Section 5, Page 2

RepairOrder	Dealer repair order number	Assigned by the dealer
VIN	Vehicle identification number	
Claim#	Porsche claim number	Unique number assigned to each warranty claim
RepairDate	Date of vehicle repair	
Mileage	Vehicle mileage at time of repair	
Model	Porsche model code	9PA = all Cayenne types
ModelYear	Model year of vehicle	
WarrantyCode	Porsche warranty type	1 = No reimbursement 2 = New car warranty 3 = Parts Warranty 5 = Goodwill 9 = Pre-owned
Damage code	Damage code reported by dealer	
Labor Operation	Labor operation code used in the repair	
PartsReplaced	Description of part used in the repair	
Comments	Dealer comment regarding the repair	(1) Complaint (2) Cause (3) Correction

PORSCHE

NHTSA – NVS-212-pco / PE05-060
February 13, 2006
Section 7, Page 1

6. Describe in detail the search criteria used by Porsche to identify the claims identified in response to Request No. 5, including the labor operation, problem codes, part numbers and any other pertinent parameters used. Provide a list of all labor operations, labor operation descriptions, problem code, and problem code descriptions applicable to the alleged defect in the subject vehicles. State, by make and model year, the terms of the new vehicle warranty coverage offered by Porsche on the subject vehicles (i.e., the number of months and mileage for which coverage offered by Porsche on the subject vehicles (i.e., the number of months and mileage for which coverage is provided and the vehicle systems that are covered). Describe any extended warranty coverage option(s) that Porsche offered for the subject vehicles and state by option, model, and model year, the number of vehicles that are covered under each such extended warranty.

6. The file extract contains all side airbags replaced in the subject Cayenne models (a total of 6 different part numbers). To this we added all claims coded to part identifier 6963 (side airbag module) or 9766 (wiring harness for side airbag) as stated in the technical bulletins, or used labor operation 69634200, or those that had technician comments mentioning fault codes 1217 and/or 1218.

Porsche offers a 4 year / 50,000 mile bumper-to-bumper warranty for all the subject vehicles.

PORSCHE

NHTSA – NVS-212-pco / PE05-060

February 13, 2006

Section 7, Page 1

7. Produce copies of all service, warranty, and other documents that relate to, or may relate to, the alleged defect in the subject vehicle, that Porsche has issued to any dealers, regional or zone offices, field offices, fleet purchasers, or other entities. This includes, but is not limited to, bulletins, advisories, informational documents, training documents, or other documents or communications, with the exception of standard shop manuals. Also include the latest draft copy of any communication that Porsche is planning to issue within the next 120 days.

7. Please refer to the enclosed electronic files "CAY6 11-04 Airbag Light Activated.pdf" and "CAY6 9-04 Airbag Faults 6-05.pdf". Porsche is not currently planning on issuing any related dealer information in the next 120 days.

PORSCHE

NHTSA – NVS-212-pco / PE05-060
February 13, 2006
Section 8, Page 1

8. Describe all assessments, analyses, test, test results, studies, surveys, simulation, investigations, inquiries and/or evaluations (collectively, "actions") that relate to, or may relate to, the alleged defect in the subject vehicle that have been conducted, are being conducted, are planned, or are being planned by, or for, Porsche. For each such action, provide the following information:
- a. Action title or identifier:
 - b. The actual or planned start date:
 - c. The actual or expected end date:
 - d. Brief summary of the subject and objective of the action:
 - e. Engineering group(s)/supplier(s) responsible for designing and conducting the action;
and
 - f. A brief summary of the findings and/or conclusions resulting from the action.

For each action identified, provide copies of all documents related to the action, regardless of whether the documents are in interim, draft, or final form. Organize the documents chronologically by action.

8. Will be forwarded as soon as possible.

PORSCHE

NHTSA - NVS-212-pco / PE05-060
February 13, 2006
Section 9, Page 1

9. Describe all modification or changes made by, or on behalf of Porsche, in the design, material composition, manufacturing, quality control, supply, or installation of the subject component, from the start of production to date, which relate to, or may relate to, the alleged defect in the subject vehicles. For each such modification or change, provide the following information:
- a. The date or approximate date on which the modification or change was incorporated into vehicle production identifiable by MY, date of build or VIN in the "PRODUCTION DATA" table of Request No. 1;
 - b. A detailed description of the modification or change;
 - c. The reason(s) for the modification or change;
 - d. The part numbers (service and engineering) of the original component;
 - e. The part number (service and engineering) of the modified component;
 - f. Whether the original unmodified component was withdrawn from production and/or sale, and if so, when;
 - g. When the modified component was made available as a service component; and
 - h. Whether the modified component can be interchanged with earlier production components.

Also, provide the above information for any modification or change that Porsche is aware of which may be incorporated into vehicle production within the next 120 days.

9. To be determined.

PORSCHE

NHTSA – NVS-212-pco / PE05-060
February 13, 2006
Section 11, Page 1

10. Produce one each of the following:
 - a. Exemplar sample of each wiring harness/connector and the wire portion of the side-airbag module of the subject component of the subject vehicle;
 - b. Field return samples of the subject component exhibiting the subject failure mode; and
 - c. Any kits that have been released, or developed, by Porsche for use in service repairs to the subject component/assembly which relate, or may relate, to the alleged defect in the subject vehicles.

10. Will be forwarded as soon as available.

PORSCHE

NHTSA – NVS-212-pco / PE05-060

February 13, 2006

Section 11, Page 1

11. Provide a summary description of the vehicle's side airbag system including a detailed description of the wiring routing as identified in the TSBs in the subject vehicle, including:
 - a. Functional block/flow diagram; and
 - b. Picture/illustration of the components and component location including the side-airbag module and the wiring harness routing.

11. Will be forwarded as soon as possible.

PORSCHE

NHTSA - NVS-212-pco / PE05-060
February 13, 2006
Section 12, Page 1

12. Furnish Porsche's assessment of the alleged defect (including both TSBs) in the subject vehicle, including:
 - a. The causal or contributory factor(s);
 - b. The failure mechanism(s);
 - c. The failure mode(s);
 - d. The risk to motor vehicle safety that it poses;
 - e. What warnings, if any, the operator and the other persons both inside and outside the vehicle would have that the alleged defect was occurring or subject component was malfunctioning;
 - f. The determination of the scope of TSB dated 6/7/05; and
 - g. The reports included with this inquiry.

12. Will be forwarded as soon as possible.