



Orig.
Ref
3/14/06

VIA UPS
March 3, 2006

Porsche Cars North America, Inc.
980 Hammond Drive
Suite 1000
Atlanta, Georgia 30328
(770) 290-3500 Fax: (770) 290-3700

Thomas Z. Cooper, Chief
Vehicle Integrity Division
Office of Defects Investigation
National Highway Traffic Safety Administration
Room 5319 (NVS-212)
400 Seventh Street, S.W.
Washington, D.C. 20590

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MAR - 9 - 2006
10:11 AM

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

Dear Mr. Cooper:

This letter is an update to our original report to you dated February 13, 2006 in response to your letter dated November 17, 2005. Attached is additional information that was unavailable at the time of our original response.

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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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.

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2.a. Consumer Complaints

Enclosed is information regarding 12 customer complaints involving Cayenne side airbags in the requested format on a CD (file: REQUEST NUMBER TWO DATA.xls). These reports were extracted from our customer complaint database for all involved Cayenne models with an extract based on a word search for "airbag". The resulting claims we then manually reviewed to determine if the complaint in question involved a side airbag.

2.b. Field Reports

Enclosed is information regarding 58 dealer field reports involving Cayenne side airbags in the requested format on the above-mentioned CD. These reports were pulled from our PQMS/PTEC database (a source data feed into our TREAD EWR archive) based on whether the report contains a part identifier for side airbag.

2.c. Crash/Injury/Fatality Reports

Porsche Cars North America, Inc. is not aware of any such claims.

2.d. Property Damage Claims

Porsche Cars North America, Inc. is not aware of any such claims.

2.e. Arbitration Proceedings

Porsche Cars North America, Inc. is not aware of any such claims.

2.f. Lawsuits

Enclosed is information regarding 9 lawsuits (breach of warranty cases) involving Cayenne side airbags in the requested format on the above-mentioned CD.

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- 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. Please refer to the enclosed CD.

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- 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. As discussed with staff we have all of the above documentation on hand and will forward immediately upon request.

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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:
- 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;
 - A detailed description of the modification or change;
 - The reason(s) for the modification or change;
 - The part numbers (service and engineering) of the original component;
 - The part number (service and engineering) of the modified component;
 - Whether the original unmodified component was withdrawn from production and/or sale, and if so, when;
 - When the modified component was made available as a service component; and
 - 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 understand the problem it has to be noted that there were a few reports from the field regarding side airbag problems, indicated by the fault code 1217 and 1218, as early as the beginning of calendar year 2004. Porsche began to inquire for detailed information and affected components from the field to investigate the problems. At the time it was not (yet) determined what caused the failures, some reports and parts analysis gave the impression that several, random problems were commingled. Additional analysis revealed later that there were two major failure patterns that caused the warning lamp illumination and subsequent repair (which was always replacement of the whole side airbag unit):
1. During the short production period (11/13/2003 to 12/17/2003) airbags were supplied by 'Takata' with an incorrectly installed ground lead. This could result in the ground lead becoming chafed, which will cause the warning lamp to be illuminated (i.e. intermittent short circuit to ground). After contacts with the supplier, Tanaka informed Porsche about this potential problem in the beginning of 2004. This problem resulted in the publication of service bulletin 9/04.

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2. The other major cause was found to be the so-called "Yazaki-plug connection", the connector between the airbag unit(s) and the main wiring harness. Contacts were found to be improper for various reasons. To improve this situation in production Porsche began to lubricate the affected contacts with "Nyogel" (SOP 5/07/04). In addition to the lubrication the plug connector was relocated (SOP during the week of 11/1/04). This problem resulted in the publication of service bulletin 11/04. Both bulletins were issued to help the technicians in the field fix the problem without lengthy fault searches and to concentrate on the main potential causes. It has to be noted that though these were the major causes for the problem, there were also random failures.

Porsche is unaware of any pertinent production changes over the next 120 days.