

Cooper, Thomas <NHTSA>

From: Cooper, Thomas <NHTSA>
Sent: Monday, November 19, 2007 10:25 AM
To: 'Martin.Rapaport@bmwna.com'
Cc: Ong, Peter <NHTSA>
Subject: FW: PE07-045 - BMW - Request for Due Date Extension
Importance: High

Hi Martin,

This is in response to your email to Peter Ong of my staff.

Your request for an extension for BMW's full response to our September 17 information request letter has been granted.

The new due date for the full response is December 17. However, so that we may conduct our investigation during this extended time period, please forward any information responsive to our information request letter that you are able to provide prior to December 17.

Thank you,

Tom Cooper

Chief, Vehicle Integrity Division
Office of Defects Investigation

From: Martin.Rapaport@bmwna.com [mailto:Martin.Rapaport@bmwna.com]
Sent: Monday, November 12, 2007 2:58 PM
To: Ong, Peter <NHTSA>
Subject: PE07-045 - BMW - Request for Due Date Extension

Hello Peter:

I need to request an extension of the due date for PE07-045.

The basis for this request is due to a number of factors which are described below.

During the time frame in which to gather, process, analyze, and prepare a response for this PE, jury duty has affected my ability in this regard. Although I specifically did not serve (my wife did), it significantly affected my work schedule and therefore, has had an affect on all work-related tasks. Because of this, my efficiency / productivity in processing the information pertaining to the PE has been slower than expected.

Additionally, as some of the information must come from our colleagues in Germany (the design, development, test, and analysis info.), and as some of the persons responsible have been out of the office for various reasons, such as vacation, and more importantly, as required ("forced") time off (due to overtime) because of "work laws" (via union contracts ("white collar" workers are unionized)) in Germany, this has added to the unexpected delay. Therefore, resource constraints have affected processing of the PE for the information that must come from Germany.

Because the two "areas of information" (design&development / aftersales) are related via vehicle model / system / component, this has also affected the rate at which the necessary aftersales information is obtained from my colleagues here. In other words, some of the aftersales information (US) is gathered based upon the design / development information (Germany), so if the information from Germany is delayed, then the information from the US is delayed.

Lastly, I have been, and continue to be, involved with a number of other issues in our office that require immediate attention on a daily basis. This has had an affect, and continues to have an affect, upon my efficiency at processing information related to the PE, i.e., information that involves significant review, analysis, and attention to detail.

Therefore, given the above, I would like to request an extension of the due date, specifically, a 30-day extension. This should allow enough time to gather, process, analyze, and prepare a response to the PE.

Certainly, if the entire response is not ready at that point, I can provide you with the information that is ready.

If you need additional information, would like to discuss directly, or have any questions, please let me know.

11/19/2007

I hope you understand, and I look forward to your / NHTSA's consideration of this request.

Thanks very much.

Martin

Martin Rapaport
Safety Engineering & Intelligent Transportation Systems
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