BMW Response
to
NHTSA EA08-001

1. State in a table format, within the body of the response letter, and in an electronic spreadsheet, by model series, model year, the total number of each group of subject vehicles ("original", "improved alloy" and improved "smaller sensor" mats) BMW has manufactured for sale or lease in the United States. Separately, for each subject vehicle manufactured to date by BMW, state the following:

a. Make;
b. Model Series;
c. Model Year;
d. Vehicle identification number (VIN);
e. Date of manufacture (in "yyyy/mm/dd" date format);
f. Date warranty coverage commenced (in "yyyy/mm/dd" date format);
g. The State in the United States where the vehicle was originally sold or leased (or delivered for sale or lease);
h. The mat type ("original", "improved alloy" or improved "smaller sensor" mat) and
i. The seat type/covering code (if differs from within a model series).

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

Response:

The source of this information is our production vehicle database and is current as of 31 Mar 2008.

Attachment ("PRODUCTION DATA") and ("PRODUCTION DATA SUMMARY") on CD No. 1 contains the requested information.

Due to the complexity of this issue, involving model, model year, seat type, and sensor mat type, this task has been more difficult than anticipated.

As explained in response to Question 9, at the present time, we have approximate date (by calendar month) production change information. However, as also noted in response to Question 9, we are in the process of obtaining an exact date (by calendar day and specific VIN) for the production change information. As noted in response to Question 9, the exact date for the production change information will be submitted to NHTSA as soon as possible.

Therefore, while item (h) is not currently present on Attachment ("PRODUCTION DATA") on CD No. 1, approximate date production change information can be ascertained from a review of Attachment ("PM") on CD No. 2 in response to Question 9, as noted above.

We have used that information in order to provide a production data summary, as depicted below in Table 1. We are in the process of building a summary of the production data ("Table 1"), as requested, using the exact date production change information, along with the seat mat type, and will submit that to NHTSA as soon as possible.

Model	Model Year	Seat Type – Standard	Seat Type – Sport	Seat Type - Comfort
3-Series	2006	28660	25421	0
5-Series	2006	13531	5443	1482
6-Series	2006	0	6222	0
7-Series	2006	0	352	15320
X3	2006	25886	0	0
X5	2006	15325	6866	2487
Z4	2006	9301	0	0
3-Series	2007	59193	56542	0
5-Series	2007	32816	0	18621
6-Series	2007	0	6216	0
7-Series	2007	0	0	16126
X3	2007	29928	0	1065
X5	2007	15535	0	6747
Z4	2007	8643	0	0
3-Series	2008	19781	23651	0
5-Series	2008	28279	0	16172
6-Series	2008	0	1605	0
7-Series	2008	0	0	5239
X3	2008	8025	0	442
X5	2008	9449	0	3731
Z4	2008	1409	0	11162

Table 1. Production Data Summary

2. State within the body of the response letter, and in an electronic spreadsheet, a table showing the number of each of the following, received by BMW, or of which BMW is otherwise aware, which relate to, or may relate to, the alleged defect in the subject vehicles ("original", "improved alloy" and improved "smaller sensor" mats):

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 a 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 complaints, or field reports;
d. Property damage claims (including own vehicle); and;
e. Third-party arbitration proceedings where BMW is or was a party to the arbitration; and
f. Lawsuits, both pending and closed, in which BMW 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 subparts "d" through "f," 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. Also identify if a crash or injury is alleged.

Provide the tables in Microsoft Excel 2000, or a compatible format, entitled "MANUFACTURER REPORT COUNT.

Response:

The number of reports, claims, complaints, etc. that relate to, or may relate to, the alleged defect in the subject vehicles is as follows, and is current as of 31 May 2008:

a. Consumer Complaints – Based upon the search criteria available, the number of consumer complaints is difficult to determine and therefore, we are hesitant to speculate as to a number that may be appropriate. This is further explained in response to Question 3. The source of this information is our customer contact database.

b. Field Reports including Dealer Field Reports – The number of field reports, including dealer field reports is 0. The source of this information is our various field report systems / databases.

c. Reports involving a crash, injury, or fatality based upon claims, notices, etc. – The number of these reports is 0. The source of this information is our various systems / databases identified within our response to other subparts of Question 2.

d. Property Damage Claims – The number of property damage claims is 0. The source of this information is our various field report systems / database that would also contain this information.

e. Third-party Arbitration Proceedings – The number of third party arbitration proceedings is included within the total for items (e) and (f), the total being 5. The source of this information is our legal database. However, as in PE07-045, these are all "Lemon Law" cases and not personal injury cases.

f. Lawsuits – The number of lawsuits is included within the total for items (e) and (f), the total being 5. The source of this information is our legal database. However, as in PE07-045, these are "Lemon Law" cases and not personal injury cases.

Information for items (e) and (f) that would, "…identify the parties to the action…or other document initiating the action was filed," is being provided to NHTSA under separate cover.

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 for the subject vehicle:

a. BMW'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 time of incident;
g. Incident date (in "yyyy/mm/dd" date format);

h. Report or claim date (in "yyyy/mm/dd" 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."

Response:

The source of this information, and its availability date, is as noted above in our response to Question 2.

Attachment ("REQUEST NUMBER TWO DATA – CC – 'xxx'") on CD No. 1 contains the requested information for consumer complaints. The file name notation "xxx" is used to identify the particular vehicle model series.

Although not specifically requested, we have also included production date, consumer comment summary, problem code and description, and service record code and description. The problem code and description is assigned by the customer service representative in an attempt to identify the specific issue pertaining to the vehicle as identified by the customer. The service record code and description, also assigned by the customer service representative, is an attempt to identify the general type of complaint as presented by the customer (e.g., survey response, technical assistance, product design, parts availability, etc.). This information should help NHTSA in their analysis. At the present time, we are not able to provide information in response to items (c), (g), and (i) through (l).

Information pertaining to arbitration proceedings and lawsuits is being provided to NHTSA under separate cover.

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

Response:

The source of this information, and its availability date, is as noted above in our response to Question 2.

Attachments (" CC – 'xxx'") on CD No. 1 contain copies of consumer complaints. The file name notation "xxx" is used to identify the particular vehicle model series.

Copies of information pertaining to arbitration proceedings and lawsuits are being provided under separate cover.

5. State within the body of the response letter and in an electronic spreadsheet, by model series and model year, a total count for all of the following categories of claims, collectively, that have been paid by BMW to date that relate to, or may relate to, the alleged defect in the subject vehicles ("original", "improved alloy" and improved "smaller sensor" mats): warranty claims; extended warranty claims; claims for good-will 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. BMW's claim number;
b. Vehicle owner or fleet name (and fleet contact person) and telephone number;
c. VIN;
d. Repair date (in "dd/mm/yyyy" date format);
e. Vehicle mileage at time of repair;
f. Repairing dealer's or facility's name, telephone number, city, 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 the summary warranty data tables also electronically in Microsoft Excel 2000, or a compatible format, entitled "WARRANTY DATA SUMMARY". Provide the warranty data file in Microsoft Access 2000, or a compatible format, entitled "WARRANTY DATA".

Response:

The source of this information is our warranty claims database and is current as of 31 May 2008.

Attachments ("WARRANTY DATA SUMMARY") and ("WARRANTY DATA") on CD No. 1 contain the requested information.

At the present time, item (b) is not able to be provided. Although not specifically requested, we are also providing the production date, model and model year for each warranty claim to assist NHTSA in their analysis.

Table 2 below contains a summary of the warranty information as requested. Question 9, specifically 9(a) requests, "…the date or approximate date on which the modification or change was incorporated into vehicle production…" As explained in response to Question 9, at the present time, we have approximate date (by calendar month) production change information. That is being used for the warranty claim analysis. However, as also noted in response to Question 9, we are in the process of obtaining an exact date (by calendar day and specific VIN) for the production change information. As noted in response to Question 9, the exact date for the production change information will be submitted to NHTSA as soon as possible.

Model	Model Year	Mat Type – IA	Mat Type – ISS
3-Series	2006	1559*	0
5-Series	2006	237	0
6-Series	2006	6	0
7-Series	2006	37	0
X3	2006	IA+ISS=718**	See IA column.
X5	2006	374	0
Z4	2006	7	0
3-Series	2007	25	112
5-Series	2007	334	14
6-Series	2007	1	0

7-Series	2007	1	0
X3	2007	0	11
X5	2007	12	0
Z4	2007	2	0
3-Series	2008	0	3
5-Series	2008	0	15
6-Series	2008	0	0
7-Series	2008	0	0
X3	2008	0	1
X5	2008	1	0
Z4	2008	0	0

IA – Improved Alloy
ISS – Improved Smaller Sensor
*Approx. 365 claims may be irrelevant (prod. date prior to 4/06 at production plant "P" may be vehicles containing original sensor mat). See response to Question 9.
**IA / ISS "split" to be determined. See response to Question 9.

Table 2. Warranty Data Summary

6. Describe in detail the search criteria used by BMW to identify the claims identified in response to Request No. 5, including the labor operations, problem codes, part numbers and any other pertinent parameters used. Provide a list of all labor operations, labor operation descriptions, problem codes, 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 (including the subject component) offered by BMW 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 BMW 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.

Response:

The search criteria involved, as a baseline, BMW service bulletin (72-02-06), which was provided as Attachment ("SB-1") on CD No. 1 in response to PE07-045.

Using the referenced service bulletin as a baseline, the search criteria utilized the description of the alleged defect, as also noted in the service bulletin, i.e., the issue of micro-cracks in the seat mat. Additionally, fault codes specifically identified in the service bulletin, and pertaining to the alleged defect, were utilized. These parameters were used in order to obtain those claims that could be applicable. Specifically, the following alpha-numeric character strings were utilized: ("*95B8*", "*93C3*", "*9780*", "*71*", "*72 02 06*", "*72-02-06*", "*72 2 06*", "*72 2 6*", "*72-2-06*", "*72-2-6*", "*MICRO*"). Furthermore, these searches were performed for claims in the 657708 (front seat occupancy detection mat) defect code group. Claims within that defect code group were thought to be those that would be applicable to the alleged defect in the subject vehicles.

Attachment ("WARRANTY DATA") on CD No. 1 contains the labor operations, labor operation descriptions, problem codes, problem code descriptions, part numbers, and part number descriptions.

Additionally, the warranty claim codes that were utilized as search criteria specifically pertained to the use of the 6-digit level (vehicle system, sub-system, component) codes. By utilizing the 6-digit level codes, paid warranty claims within the 8- and 10-digit (more detailed) levels are also captured during the search. Use of the 6-digit level codes ensures that all possible relevant paid warranty claims are captured by conducting a more comprehensive ("wider") search of the warranty database than otherwise would be accomplished if utilizing instead the 8- or 10-digit level claim codes.

The terms of the new vehicle warranty coverage offered by BMW on the subject vehicles is identical to the coverage for the PE07-045 subject vehicles, and is contained in Attachment ("WC-2") on CD No. 1 in response to the PE.

7. Produce copies of all service, warranty, and other documents that relate to, or may relate to, the alleged defect in the subject vehicles (all issued revisions), that BMW 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 BMW is planning to issue within the next 120 days.

Response:

The source of this information is our technical service database and is current as of 31 May 2008.

Attachment ("SB-1"), on CD No. 1 provided in response to PE07-045, contains the requested information.

8. Describe all assessments, analyses, tests, test results, studies, surveys, simulations, investigations, inquiries and/or evaluations (collectively, "actions") that relate to, or may relate to, the alleged defect in the subject vehicles that have been conducted, are being conducted, are planned, or are being planned by, or for, BMW. This includes but is not limited to any and all actions by VDO Automotive AG relating to micro-cracks in the OC3 seat mat. 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 for 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.

Response:

The source of this information is our various technical development departments and was last gathered on 29 July 2008.

As noted in the cover letter, we have provided certain information as a preliminary response to Question 8. Attachment ("TA") on CD No. 2 contains that information. However, we are attempting to locate possible additional responsive information, and will supplement this response if additional documents are located. We intend to provide NHTSA with an update on this matter within a week.

9. Describe all modifications or changes made by, or on behalf of, BMW in the design, material composition, manufacture, 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. This includes but is not limited to any and all modifications or changes by VDO Automotive AG relating to the OC3 mat and all subsequent designs. 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 BMW is aware of which may be incorporated into vehicle production within the next 120 days.

Response:

The source of this information is our various technical development departments and was last gathered on 29 July 2008.

As noted in Question 9(a), and in the attachment responsive to this question, we are providing the "…approximate date on which the modification or change was incorporated into vehicle production…" At the present time, we have approximate date (by calendar month) production change information. However, we are in the process of obtaining an exact date (by calendar day and specific VIN) for the production change information which will be submitted to NHTSA as soon as possible.

Attachment ("PM") on CD No. 2 contains the requested information.

10. Produce one each of the following:

a. Exemplar sample from one of the X3, 5-Series or 7-Series vehicle/seat type showing the progression of designs from the "original", "improved alloy" and improved "smaller sensor" mats of a given vehicle/seat type;
b. Field return samples of the "original", "improved alloy" and "smaller sensor" subject component exhibiting the subject failure mode; and
c. Any kits and software changes (including patches, modifications/rework procedures, and software programming) that have been released, developed or

are being developed, by BMW for use in service repairs to the subject component/assembly which relate, or may relate, to the alleged defect in the subject vehicles.

Response:

Samples will be provided under separate cover.

11. Furnish copies of all communications sent from and received by BMW that relate to or may relate to the alleged defect; including but not limited to such communications between BMW and VDO Automotive AG and between employees and/or entities within BMW (e.g., any such communication between BMW of North America LLC and BMW AG).

Response:

In an agreement reached between NHTSA and BMW, NHTSA has withdrawn this question.

12. Furnish BMW's assessment of the alleged defect 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 indicator (system has not failed yet), if any, the operator and the other persons would have that the alleged defect was beginning to occur or subject component is starting to malfunction; and
f. What failure indicator (system is no longer operable), if any, the operator and the other persons would have that the alleged defect has occurred or subject component had malfunctions.

Response:

As noted in our April 16, 2008 and July 18, 2008 letters to NHTSA, we plan to proceed with a voluntary owner notification and product rework campaign as expeditiously as possible. BMW plans to conduct the rework campaign without making a defect determination; however, BMW agrees to adhere to all the requirements of Sections 30118 through 30120 of 49 USC 301, and to be bound by all other sections of 49 USC 301 and regulations relating to recall campaigns. Furthermore, the mailing of owner letters containing the statements required by 49 CFR 577 is not intended, and should not be considered, to be an admission that BMW has determined that a safety-related defect exists in these vehicles.

Nevertheless, in order to resolve this issue with the agency we are preparing to implement a voluntary owner notification and product rework campaign in the form and manner as outlined above, and as described in further detail in our April 16, 2008 and July 18, 2008 letters to NHTSA.

We will now provide our response to the specific questions that are a part of this information request.

Question 12(a), (b), and (c):

Depending upon vehicle geometry and seat configuration, a fatigue failure of the front passenger air bag occupant detection seat sensor mat can occur, and lead to the deactivation of the front passenger air bag (with the exception of the head protection system). This condition also depends upon the nature and frequency of the front passenger's entry and exit of the vehicle. Repeated pressure/stress applied to the seat cushion's side flanks when a front seat passenger enters/exits the vehicle are contributing factors. This pressure/stress is then directly applied to the occupant detection sensor mat. Specifically, over a period of time, and depending upon the factors noted above, micro-cracks could develop in the front passenger seat cushion side flanks. If a micro-crack leads to a break in a conductive path of the sensor mat, the occupant detection system will recognize this condition. Consequently, the air bag warning lamp, as well as, the passenger air bag "on-off" lamp, would illuminate in such a case.

Question 12(d):

BMW believes that this issue does not introduce a new crash risk, or pose an unreasonable risk to motor vehicle safety given the sufficient warnings to the driver and other vehicle occupants from the air bag warning lamp and the passenger air bag on-off lamp in vehicles that are experiencing this problem. This is further described in 12(f) below.

Overall Warranty Claim Experience on "Category (b) and Category (c)" Subject Vehicles is Approximately 0.6%

In addition to our position noted in the subparagraphs of our response to Question 12(d) below, we would also like to indicate to the agency that the overall warranty claim rate for "category (b) and category (c)" subject vehicles is significantly lower (approximately 0.6%) than for "category (a)" vehicles. (Category (a) vehicles were the sole focus of PE07-045.) Therefore, over time, we believe that the changes we have implemented in the design of the occupant detection sensor mat have been successful. Accordingly, we do not believe that a field action on these vehicles is necessary.

Field Experience Suggests a Customer Satisfaction, Rather than a Customer Safety, Problem

Warranty Claim Experience

As evidenced by the warranty claim history, vehicle operators who have experienced this problem have brought their vehicle to a dealer for service and repair. Therefore, the warning lamp appears to be performing its intended function, i.e., alerting vehicle owners that there exists a potential problem, and to seek quick, perhaps immediate, attention.

Field Report and Customer Complaint Experience

Information provided in response to Questions 2, 3, and 4 indicate that while there are air bag warning lamp illuminations and passenger air-bag on-off lamp illuminations in vehicles, there have been no cases of crashes that BMW is aware of that indicate that deployment of the passenger air bag was needed, and in which the alleged defect is present. We do not have any evidence that suggests that there is a crash case in which the air bag electronic control module "called for" passenger air bag deployment.

Therefore, we believe the issue is better characterized as a customer satisfaction problem, rather than a customer safety problem. Customers are concerned that the air bag warning lamp in their vehicle is illuminated, as they should be, and as the function of the lamp is intended. Our Owners Manual provides adequate information and warnings to vehicle owners in order for them to have their vehicles repaired in a timely manner. The Owners Manual indicates that should the air bag system warning lamp illumination be ignored, an air bag deployment may not occur if necessary.

Legal Claim Experience

BMW has not received any legal claims involving death or injury alleged to have occurred by the alleged defect in the subject vehicles, nor notices alleging or proving that a death or injury was caused by the alleged defect in the subject vehicles. Therefore, there are no "…reports involving a crash, injury, or fatality…" based on such legal claims or notices, because such legal claims or notices have not been received by BMW. Rather, we are in receipt of some "Lemon Law" cases in which this issue is identified, but, it is only one of a number of alleged vehicle problems that form the basis of these "Lemon Law" legal actions.

Accordingly, we do not believe that the issue identified within this Information Request constitutes an unreasonable risk to motor vehicle safety.

Question 12(e):

None.

Question 12(f):

Adequate warnings are provided to the driver, and to other occupants, of a vehicle that is experiencing this problem.

Air Bag Warning Lamp Illumination

If a vehicle is experiencing this problem, the air bag warning lamp, and the passenger air bag on-off lamp, are both illuminated. We believe that these warnings are a sufficient indication to a vehicle operator that the vehicle is experiencing a problem, and therefore, should be repaired.

There are many rulemakings involving vehicle systems with warning lamps that are intended to alert a vehicle operator that the system in question may be experiencing a problem. A recent rulemaking, involving Electronic Stability Control (ESC) systems (Docket 2006-25801; 54712 Fed. Reg. @ 54729; 18 Sep 06) contained the following NHTSA quote:

> "We believe that there are safety benefits associated with certain of these warnings. There is an obvious safety need to warn the driver in case of an ESC malfunction so that the system can be repaired."

Therefore, we believe that as long as the warning lamp for a vehicle system is being illuminated when a potential problem exists, that is a sufficient condition for a vehicle operator to seek service and repair of their vehicle and the specific system involved.

Owners Manual Recommendations

The vehicle Owners Manual provides a section pertaining to the air bag system. A description of the functionality of the air bag system warning lamp and the passenger air bag on-off lamp is provided in this section. The owner is instructed to have the vehicle serviced if the air bag warning lamp does not briefly illuminate during vehicle start-up, illuminates while driving, or remains illuminated while driving, indicating that there is a potential problem with the air bag system.

The Owners Manual text suggests that the potential problem could cause the front passenger air bag system to not deploy in a crash in which a deployment is necessary, and therefore, to have the vehicle serviced. Specifically, the text states,

> "In the event of a fault in the air bag system, have it checked without delay, otherwise there is the risk that the system will not function as intended even if a sufficiently severe accident occurs."

The Owners Manual also contains a section specifically regarding warning lamps, and contains information regarding the air bag system warning lamp. It refers the reader to the section regarding the functionality of the air bag system, and in particular, the air bag warning lamp for specific details. We believe that most vehicle operators will be concerned with illumination of the air bag warning lamp, and will seek service to rectify the potential problem with the system.

BMW Safety Belt Reminder System

Additionally, all of the subject vehicles incorporate the BMW safety-belt reminder system. This system produces an aggressive and relentless warning, consisting of a noticeable chime for a passenger that is unbelted. The chime repeats itself every few seconds for several minutes. Then, after a short "break", the chime is repeated again, every few seconds for several minutes. This cycle continues to repeat. Therefore, even in a case in which the air bag warning lamp was illuminated, an unbelted passenger would be strongly reminded to fasten their safety belt.

Accordingly, we believe that there is sufficient warning to drivers and other occupants that the vehicle is experiencing a potential problem, and should be repaired as soon as possible.