

BMW Group

July 7, 2008

Thomas Z. Cooper
Chief, Vehicle Integrity Division
Office of Defects Investigation
National Highway Traffic Safety Administration
1200 New Jersey Ave., S.E.
Washington, DC 20590

Re: PE08-031

Dear Mr. Cooper:

With this letter, BMW is responding to NHTSA's Information Request dated May 7, 2008 in the above captioned matter.

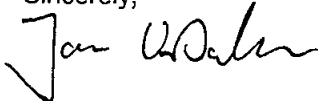
The attachments included with this letter comprise BMW's response to PE08-031. As requested, BMW has repeated each question verbatim and provided our response accordingly. Our detailed responses are contained in the attachments.

Portions of our response contain information that is considered by BMW to be confidential, and accordingly, those materials are not being submitted to your office. As instructed, the portions of our response that are claimed by BMW to be confidential are being submitted to the Office of Chief Counsel, along with our request for confidentiality including supporting material, and the required 49 CFR 512 Certificate.

Additionally, BMW understands that it is NHTSA policy to protect the privacy of individuals under Exemption 6 of the Freedom of Information Act, 5 USC Section 552(b)(6). Certain information requested by NHTSA, such as personal information pertaining to BMW vehicle owners that is contained in the attachments, although not claimed herein to be "BMW Confidential" pursuant to 5 USC Section 552(b)(4) (Exemption 4) and 49 CFR 512, should not be made public by NHTSA in accordance with Exemption 6.

Should you have any questions pertaining to the information enclosed with this letter, please contact me at (201) 573-2071, or Martin Rapaport of my staff at (201) 573-7708.

Sincerely,



Jan Urbahn
General Manager
Safety Engineering & Intelligent Transportation Systems

Attachments:

CD No. 1

Cc:

A. Cooke, Esq., NHTSA (Chief Counsel) – Letter Only

Company
BMW of North America, LLC

BMW Group Company

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**BMW Response
to
NHTSA PE08-031**

1. State the number of all subject vehicles BMW has manufactured for sale in the United States. Separately, for each vehicle manufactured to date by BMW, state the following:

- a. Vehicle identification number (VIN);
- b. Date of manufacture;
- c. Date warranty coverage commenced;
- d. 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".

Response:

Our response below addresses both Question 1 (subject vehicles (MINI Cooper S)), and Question 6 (non-subject vehicles (MINI Cooper)). The source of this information is our production vehicle database and is current as of 31 Mar 2008.

Attachment "P-PRODUCTION DATA" on CD No. 1 contains the requested information. Regarding item 1(c), warranty coverage commences on date of sale.

2. State 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:

- a. Consumer complaints;
- 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 the alleged defect in a subject vehicle, property damage claims, consumer complaints, or field reports;
- d. Third-party arbitration proceedings where BMW is or was a party to the arbitration; and,
- e. Lawsuits, both pending and closed, in which BMW is or was a defendant or codefendant.

For subparts "a" through "e", state the total number of each item (e.g., consumer complaints, reports from retailers, etc.) separately. Multiple incidents involving the same vehicles 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).

In addition, for item "c" provide a summary description of the alleged problem and causal and contributing factors and BMW's assessment of the problem, with a summary of the significant underlying facts and evidence. For items "d" and "e", 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.

Response:

Our response below addresses both Question 2 (subject vehicles (MINI Cooper S)), and Question 6 (non-subject vehicles (MINI Cooper)).

The number of reports, claims, complaints, etc. that relate to, or may relate to, the alleged defect in the subject vehicles (MINI Cooper S), and non-subject vehicles (MINI Cooper), is as follows:

- a. Consumer Complaints – The number of consumer complaints pertaining to subject vehicles (MINI Cooper S) is 19, while the number of consumer complaints pertaining to non-subject vehicles (MINI Cooper) is 17. However, some consumer complaint records did not contain the Model, Model Year, or VIN. Because the VIN is not present, determining whether or not the consumer complaint pertained to a subject vehicle (MINI Cooper S) or non-subject vehicle (MINI Cooper) was not possible. There were 9 consumer complaints in which subject vehicle (MINI Cooper S) or non-subject vehicle (MINI Cooper) could not be determined. The source of this information is our customer contact database and is current as of 27 May 08.
- b. Field Reports including Dealer Field Reports – The number of field reports pertaining to subject vehicles (MINI Cooper S) is 9, while the number of field reports pertaining to non-subject vehicles (MINI Cooper) is 5. None of these field reports are dealer field reports. The source of this information is our various field report systems / databases and is current as of 23 May 08.
- c. Reports involving a crash, injury, or fatality based upon claims, notices, etc. – The number of these reports pertaining to subject vehicles (MINI Cooper S) is 43, while the number of these reports pertaining to non-subject vehicles (MINI Cooper) is 27. As noted above under (a), some vehicles were not able to be identified as subject vehicles (MINI Cooper S) or non-subject vehicles (MINI Cooper). There were 9 reports in which subject vehicle (MINI Cooper S) or non-subject vehicle (MINI Cooper) could not be determined. The source of this information is our various systems / databases identified within other subparts to Question 2.
- d. Third-party Arbitration Proceedings – The number of third party arbitration proceedings is 0. The source of this information is our legal database and is current as of 6 Jun 08.
- e. Lawsuits – The number of lawsuits pertaining to subject vehicles (MINI Cooper S) is 0, while the number of lawsuits pertaining to non-subject vehicles (MINI Cooper) is 1. The number of claims pertaining to subject vehicles (MINI Cooper S) is 4, while the number of claims pertaining to non-subject vehicles (MINI Cooper) is 2 (which number includes the lawsuit already disclosed above). The source of this information is our legal database and is current as of 6 Jun 08.

For item (c), a "...summary description of the alleged problem and causal and contributing factors and BMW's assessment of the problem, with a summary of the significant underlying facts and evidence..." is provided in our response to Question 12.

For items (d) and (e), "...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..." is provided in Attachment "C-CLAIMS" on CD No. 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. BMW's file number or other identifier used;
- b. The category of the item, as identified in Request No. 2 (i.e., consumer complaint, report from retailer, etc.);
- c. Vehicle owner's name, address, and telephone number;
- d. Vehicle model;
- e. Vehicle date of manufacture;
- f. Incident date;
- g. Report or claim date; and
- h. Number of alleged injuries.

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

Response:

Our response below addresses both Question 3 (subject vehicles (MINI Cooper S)), and Question 6 (non-subject vehicles (MINI Cooper)). The source of this information, and its availability date, is as noted above in our response to Question 2 and Question 6.

Attachment "REQUEST NUMBER TWO DATA" on CD No. 1 contains the requested information.

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, reports from retailers, etc.) and describe the method BMW used for organizing the documents.

Response:

Our response below addresses both Question 4 (subject vehicles (MINI Cooper S)), and Question 6 (non-subject vehicles (MINI Cooper)). The source of this information, and its availability date, is as noted above in our response to Question 2.

Attachment "CC-CONSUMER COMPLAINTS" on CD No. 1 contains copies of consumer complaints.

Attachment "FR-FIELD REPORTS" on CD No. 1 contains copies of the field reports.

Attachment "C-CLAIMS" on CD No. 1 contains a copy of the one lawsuit, and one claim, pertaining to non-subject vehicles (MINI Cooper), as well as, the four claims pertaining to subject vehicles (MINI Cooper S).

5. State 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: warranty claims; extended warranty claims; claims for good will services that were provided; 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's name and telephone number;
- c. Vehicle model;
- d. Vehicle date of manufacture;
- e. Repair date;
- f. Repairing 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 the technician or person(s) making the repair, and/or the person(s) processing the claim that relate to the claim and/or repair.

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

Response:

Our response below addresses both Question 5 (subject vehicles (MINI Cooper S)), and Question 6 (non-subject vehicles (MINI Cooper)). The source of this information is our warranty claims database and is current as of 3 Jun 08.

The number of these types of warranty-related claims for subject vehicles (MINI Cooper S) is 0, while the number of these types of warranty-related claims for non-subject vehicles (MINI Cooper) is 1.

Attachment "W-WARRANTY" on CD No. 1 contains the requested information.

6. For all other model years of MINI Cooper "S" and MINI Cooper vehicles, provide the information requested by Requests Nos. 1 through 5 above. Please label the associated files to these responses as "other model year / model vehicles," e.g., PRODUCTION DATA: OTHER MODEL YEAR / MODEL VEHICLES, etc.

Response:

As noted above in response to Questions 1 through 5, we have provided this information within this document, as well as, within the various attachments (electronic files) associated with each of the aforementioned questions.

7. 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 the terms of the new vehicle warranty coverage offered by BMW on the subject vehicles (i.e., the number of months for which coverage is provided and the vehicle systems that are covered). Describe any extended warranty coverage option(s) related to the alleged defect 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 source of this information is our warranty claims database and is current as of 3 Jun 08.

Attachment "W-WARRANTY" on CD No. 1 contains the requested information.

An initial search based upon part number for the exhaust system tailpipe extensions only returned a few warranty claims; moreover, after a review of the claim comments, none of those claims relate to, or may relate to, the alleged defect. Issues such as corrosion, vibration, noise, missing, etc. were reasons for the filing of those warranty claims.

A second search used the problem codes for the exhaust system tailpipe and then a text search. Key words such as "burn, burns, hurt, heat, hot, pipe, tailpipe, injury, injured, leg, body, shin, damage, bandage, first aid, emergency, 911" were used. Even using this method only revealed a few claims; moreover, after a review of those claims, only issues such as "burnt smell", or "odor" were the basis for those claims.

A third search was performed based upon the TREAD Act Early Warning Reporting problem code for "engines and engine cooling" along with the same words for the key word search noted above. This search only produced a single warranty claim related to the issue. In particular, it is applicable to Question 6 (non-subject vehicle (MINI Cooper)), as it pertains to a MY07 Cooper.

Attachment "W-WARRANTY" on CD No. 1 problem codes, problem code descriptions, part numbers, and part number descriptions. Labor operation codes/descriptions do not apply in this matter.

The terms of the new vehicle warranty coverage offered by BMW on the subject vehicles (MINI Cooper S) is contained in Attachment "W-WARRANTY" on CD No. 1.

8. Produce copies of all service, warranty, and other documents that relate to, or may relate to, the alleged defect in the subject vehicles, that BMW has issued to any retailers or distributors, regional or zone offices, field offices, or other such 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 14 May 08.

BMW has not issued, and does not plan to issue, any communications of the types identified above.

9. 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. 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 is current as of 26 Jun 08.

Attachment "TA" on CD No. 2 contains a summary of the requested information and accounts for the "actions" that were conducted. Attachment "TA" also contains copies of documents related to the action.

10. 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 would include any changes made to the rear bumper cover. 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;
- 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 is current as of 26 Jun 08.

Attachment "PM" on CD No. 2 contains the requested information and describes the design change associated with the subject vehicles (MINI Cooper S).

11. Produce one each of the following:

- a. Exemplar samples of each design version of the tailpipe extension of the subject components; and

- b. **Any kits that have been released, or 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.

12. **Furnish BMW's assessment of the alleged defect in the subject vehicles 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, that the alleged defect was occurring or that the subject component was malfunctioning; and**
- f. **The reports included with this inquiry.**

Response:

Question 12(a) to (d):

While driving, exhaust systems as well as exhaust tail pipes heat up. In case of a contact of hot parts of the exhaust system and parts of the human body there is a general risk of a burn. This fact is true for all vehicles and constitutes general knowledge. The MINI manual contains a clear reference to this risk ("Do not touch hot exhaust tail pipes. Otherwise there is a risk of burns."), refer to 12(e).

Specifically, it states the following, and contains the well-known "cautionary warning triangle":

Hot Exhaust System

In all vehicles, extremely high temperatures are generated in the exhaust system. Do not remove the heat shields installed adjacent to various sections of the exhaust system, and never apply undercoating to them. When driving, standing at idle, and while parking, take care to avoid possible contact between the hot exhaust system and any highly flammable materials such as hay, leaves, grass, etc. Such contact could lead to a fire, with the risk of serious personal injuries or property damage. Do not touch hot exhaust tail pipes. Otherwise, there is a risk of burns.

The exact risk posed by each vehicle make and model depends on numerous factors such as position of the exhaust tail pipes, extent of outbound shift, maximum temperature of the exhaust tail pipes, etc. The position of the exhaust system of the MINI Cooper S (including the middle position of the two exhaust tail pipes) complies with all relevant motor vehicle safety standards world-wide. Consequently, this version of the car was certified and accepted by all admission boards world-wide.

Therefore, BMW strongly believes that this issue does not pose an unreasonable risk to motor vehicle safety.

BMW Group

July 7, 2008

Anthony Cooke, Esq.
Chief Counsel
National Highway Traffic Safety Administration
1200 New Jersey Ave., S.E.
Washington, D.C. 20590

Re: Request for Confidential Treatment of Information Submitted in PE08-031

Dear Mr. Cooke:

Today, BMW of North America, LLC (a subsidiary of BMW AG of Munich, Germany ("BMW")) is submitting its response to the Information Request, dated May 7, 2008, in the above captioned matter. Because a portion of BMW's response, specifically, CD No. 2, is considered by BMW to be confidential, we believe it is entitled to confidential treatment under 49 C.F.R. Part 512 and Exemption 4 of the Freedom of Information Act ("FOIA"), 5 U.S.C. § 552(b)(4). Accordingly, BMW is hereby submitting this request for confidential treatment of that material.

As set forth in the attached certificate, some of the information for which we are requesting confidential treatment is maintained in strict confidence by BMW, and some of the information is maintained in strict confidence by BMW and its select suppliers pursuant to confidentiality agreements. This information is not customarily made public by BMW or its select suppliers, and contains both trade secrets and commercial information, which is privileged or confidential under 5 U.S.C. § 552(b)(4), 49 C.F.R. 512, and 49 U.S.C. 30167(a).

As noted above, the information for which BMW is requesting confidential treatment consists of CD No. 2 in BMW's response to the Information Request. We are requesting confidential treatment of CD No. 2 in its entirety. We further request that CD No. 2 be accorded confidential treatment on a permanent basis, because there is no foreseeable time in the future when this information could be disclosed without causing substantial harm to the competitive position of BMW and its suppliers in this matter.

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BASIS FOR REQUEST FOR CONFIDENTIAL TREATMENT

Exemption 4 of the FOIA protects from disclosure "trade secrets and commercial or financial information obtained from a person and privileged or confidential." 5 U.S.C. § 552(b)(4). The information for which BMW is requesting confidential treatment is "commercial" information that is "privileged or confidential." See *Judicial Watch, Inc. v. Export-Import Bank*, 108 F. Supp. 2d 19, 28 (D.D.C. 2000) ("In the context of Exemption 4, the terms 'commercial' and 'financial' should be given their ordinary meanings. Further, the exemption applies where the submitter has a 'commercial interest' in the information.") (citations omitted).

The documentation contained within CD No. 2 consists of different types of confidential information as explained in greater detail below.



Some of the information consists of results of tests and analyses of vehicle systems/components. This information includes details pertaining to vehicle system/component design and performance as a result of conducting such tests and analyses. Some of the information also consists of test and analyses methodologies that have been developed in order to understand issues regarding specific vehicle systems/components. These tests and analyses methodologies would provide valuable insight into how some of BMW's and its select suppliers conduct certain tests.

Some of the information consists of vehicle systems/component specifications, engineering tolerances, engineering drawings, and other design data. Competitors who would have access to this information would be able to understand the design basis for certain vehicle systems/components without having to make the necessary investment that has been made by BMW and its select suppliers. Some of the information also consists of proprietary protocols and confidential processes used in the analyses of certain vehicle systems/components, information that is of great value to BMW's competitors.

The information for which BMW is requesting confidential treatment are the product of BMW's and its select suppliers' long experience and substantial investments of time and money in establishing this information. The disclosure of this information would permit BMW's competitors to understand certain issues involving specific vehicle systems/components without having to incur the substantial time and expense associated with these efforts that have already been expended by BMW and its select suppliers in this matter. BMW's competitors could use this information to analyze, further develop, and improve their products without having to expend the substantial resources that have already been incurred by BMW and its select suppliers.

This information, therefore, would be commercially valuable to BMW's competitors, and its disclosure would cause BMW substantial competitive harm. Consequently, this information should be accorded confidential treatment under the Exemption 4 of the FOIA. *See Worthington Compressors, Inc. v. Castle*, 662 F.2d 45, 52 (D.C. Cir. 1981) (application of Exemption 4 depends on "whether release of the requested information, given its commercial value to competitors and the cost of acquiring it through other means, will cause substantial competitive harm to the business that submitted it"); *National Parks & Conservation Ass'n v. Morton*, 498 F.2d 765, 770 (D.C. Cir. 1974) (information is exempted from disclosure under FOIA Exemption 4 if its disclosure would "cause substantial harm to the competitive position of the person" submitting it); *cf. Public Citizen Health Research Grp. v. FDA*, 185 F.3d 898, 905 (D.C. Cir. 1999) (harm caused by a disclosure that would "eliminate much of the time and effort that would otherwise be required to bring to market a product competitive with" the submitter's product is "clearly the type of competitive harm envisioned in Exemption 4").


Thus, because BMW would suffer substantial harm to its competitive position if any of the information within CD No. 2 were disclosed, the information should be accorded confidential treatment.

* * *

Additionally, BMW understands that it is NHTSA policy to protect the privacy of individuals under Exemption 6 of the Freedom of Information Act, 5 USC Section 552(b)(6). Certain information requested by NHTSA, such as personal information pertaining to BMW vehicle owners that is contained in the attachments, although not claimed herein to be "BMW Confidential" pursuant to 5 USC Section 552(b)(4) (Exemption 4) and 49 CFR 512, should not be made public by NHTSA in accordance with Exemption 6.

As noted above, the certificate required by 49 C.F.R 512 is attached to this letter. If you need additional information, please do not hesitate to contact me at (201) 573-2071, or Martin Rapaport of my staff at (201) 573-7708. If you receive a request for disclosure of any of the information within CD No. 2 prior to the completion of your review of our claim for confidential treatment, BMW respectfully requests notification of the request and an opportunity to provide further justification for the confidential treatment of the information, if warranted.

Sincerely,

A handwritten signature in black ink that reads "Jan Urbahn". The signature is written in a cursive, slightly slanted style.

Jan Urbahn
General Manager
Safety Engineering and Intelligent Transportation Systems

Attachments:

49 CFR 512 Certificate
CD No. 1
CD No. 2

Cc:

T. Cooper, NHTSA (Office of Defects Investigation) – Letter only

BMW Group

CERTIFICATE IN SUPPORT OF REQUEST FOR CONFIDENTIAL TREATMENT

I, Jan Urbahn, pursuant to the provisions of 49 C.F.R. Part 512, state as follows:

(1) I am the General Manager, Safety Engineering and Intelligent Transportation Systems for BMW of North America, LLC ("BMW"), and I am authorized by BMW to execute documents on its behalf.

(2) The information attached hereto and identified in the attached letter is confidential and proprietary and is being submitted with the claim that it is entitled to confidential treatment under 5 U.S.C. § 552(b)(4) and 49 C.F.R. Part 512.

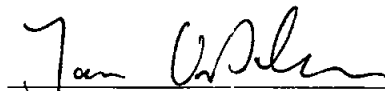
(3) I have personally inquired of the responsible BMW personnel who have authority in the normal course of business to release the information for which a claim of confidentiality has been made to ascertain whether such information has ever been released outside BMW.

(4) Based upon such inquiries, to the best of my knowledge, information, and belief, some of the information for which BMW has claimed confidential treatment has been released only to BMW's suppliers pursuant to confidentiality agreements.

(5) I make no representation beyond those contained in this certificate, and, in particular, I make no representation as to whether the information may become available outside BMW because of unauthorized or inadvertent disclosure.

(6) I certify under penalty of perjury that the foregoing is true and correct.

Executed on this 7th day of July, 2008



Jan Urbahn
General Manager
Safety Engineering and Intelligent Transportation Systems
BMW of North America, LLC

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BMW of North America, LLC

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