

BMW Group

October 27, 2014

Ms. Jennifer T. Timian
Chief, Recall Management Division
Office of Defects Investigation
National Highway Traffic Safety Administration
1200 New Jersey Ave., S.E.
Washington, DC 20590

**Re: AQ10-001
Audit of Rental-Car Safety-Recall-Campaign Completion**

Dear Ms. Timian:

With this letter, BMW is responding to NHTSA's Information Request dated October 14, 2014 in the above captioned matter. As requested, BMW has repeated each question verbatim and provided our response accordingly. Our detailed responses are contained in the attachments. Unless noted otherwise, the source of the information is the NHTSA flat file and BMW internal records, as of October 18, 2014.

- 1. Identify, by the recall's NHTSA-assigned identification number, each recall conducted by you since January 1, 2000.**

Please see the worksheets named BMW&MINI, Motorcycles and Rolls-Royce on the attached file.

- 2. Provide the total number of vehicles covered by all recalls identified in response to Question No.1.**

3,642,416. Please see the attached file's totals at the bottom of the worksheets named BMW&MINI, Motorcycles and Rolls-Royce, with this Grand Total calculated on the worksheet named Totals.

- 3. Identify, by the recall's NHTSA-assigned identification number, each recall conducted by you since January 1, 2000 for which the notification required by 49 U.S.C. § 30118(b) or 30118(c) contained precautionary advice to refrain from driving until the remedy specified by the recall was completed.**

Please see the extract below from the worksheet named Do Not Drive in the attached file.

BMW & MINI	Volume
00V-010	190
04V-344	4,102
12V-475	696
Total =	4,988
Motorcycles	
06V-486	144
07V-151	305
07V-368	425
07V-367	173
07V-376	764
07V-466	510
14V-320	950
Total =	3,271
Grand Total	8,259

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BMW of North America, LLC

BMW Group Company

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The source of the information is the NHTSA flat file cross-referenced against BMW internal copies of associated Owner Notification Letters, as of October 18, 2014.

4. For each recall identified in Question No.3, provide the total number of vehicles covered by the recall.

Please see the extract below from the worksheet named Do Not Drive in the attached file.

BMW & MINI	Volume
00V-010	190
04V-344	4,102
12V-475	696
Total =	4,988
Motorcycles	
06V-486	144
07V-151	305
07V-368	425
07V-367	173
07V-376	764
07V-466	510
14V-320	950
Total =	3,271
Grand Total	8,259

5. Provide the total number of vehicles covered by all recalls identified in response to Question No. 3.

8,259. Please see the worksheet named Do Not Drive in the attached file.

Many of BMW's Owner Notification Letters (ONL) include precautionary measures, in which we typically advise consumers how they might detect if the defect was occurring while driving. Often, we will recommend that they safely stop the vehicle if the defect is occurring and have the vehicle towed to a dealer. Please see #4 under "PRECAUTIONS FOR YOUR SAFETY" in the attached 13V-454 ONL letter, provided as an example.

If NHTSA is interested in learning more about this BMW owner notification letter approach, which we do not interpret as advice to completely refrain from driving, please do not hesitate to contact me at (201) 571-5360, or Fran Dance or my staff at (201) 571-5238.

Sincerely,

BMW of NORTH AMERICA, LLC



Sam Campbell
Department Head
Safety Engineering and Intelligent Transportation Systems

Attachments

IMPORTANT SAFETY RECALL

This notice applies to your vehicle, [INSERT VIN].

January 2014

Recall Campaign No. 13V-454: Vacuum Pump Oil Supply

Dear BMW Owner/Lessee:

This notice is sent to you in accordance with the requirements of the National Traffic and Motor Vehicle Safety Act.

BMW AG has decided that a defect, which relates to motor vehicle safety, exists in certain model year 2012-14 BMW 3 Series Sedans, 3 Series Sports Wagons, 5 Series Sedans, X1 SAV, X3 SAV and Z4 models. Our records indicate that you are the owner of a potentially affected vehicle.

IMPORTANT NOTICE

Please note that we had informed you of this matter by letter in November, and indicated that the necessary parts for your vehicle were not yet available. In our November letter, we stated that we would inform you when parts were available, and to schedule a visit with your authorized BMW center at that time. With this letter, we are pleased to inform you that the necessary parts are now available, and we encourage you to schedule an appointment with your authorized BMW center as soon as possible.

DESCRIPTION OF PROBLEM

This Recall involves the power assist braking system. In rare cases, the power assist braking system may not function properly. A loss of power assist braking would require you to provide greater brake pedal force. Although hydraulic braking (braking without power assist) remains available, a longer distance would be needed to stop the vehicle, possibly increasing the risk of a crash.

DESCRIPTION OF REPAIR

The power assist braking system will be inspected and, if necessary, the sealing cap will be secured, which will ensure the brake vacuum pump is lubricated properly.

The actual repair will require approximately two hours; however, additional time may be required depending on the BMW center's schedule. This work will be performed free of charge by your authorized BMW center.

PRECAUTIONS FOR YOUR SAFETY

- 1. CONTACT YOUR AUTHORIZED BMW CENTER IMMEDIATELY TO HAVE THE NECESSARY REPAIR PERFORMED AS SOON AS POSSIBLE.**

2. **If you notice a loss of power assist braking (greater pedal pressure is required), the vehicle may be experiencing this condition.**
3. **If this condition occurs, hydraulic braking (braking without power assist) remains available, although a longer distance would be needed to stop the vehicle.**
4. **IF YOU NOTICE A DECREASE OF POWER BRAKE ASSIST, DO NOT CONTINUE TO DRIVE YOUR VEHICLE. Carefully move away from traffic and pull over to a safe location as soon as possible. Contact BMW Roadside Assistance at 1-800-332-4269 to have your vehicle brought to the nearest authorized BMW center.**
5. **If you are not the only driver of this vehicle, please advise all other drivers and passengers of this important information.**

OTHER INFORMATION

Should you need BMW Roadside Assistance, they can be contacted at 1-800-332-4269.

If you are no longer the owner of this vehicle, we would appreciate your furnishing us with the name and address of the new owner, using the enclosed postage-paid card.

If you are a lessor of this vehicle, Federal Regulations require you to forward this notice to your lessee within ten days.

If you have already had this repair performed at your own expense, please see the attachment regarding possible eligibility for reimbursement.

We sincerely apologize for any inconvenience this may cause you. We appreciate your confidence in our product, and we wish to do everything we can to retain it. **Should you have any questions about this campaign, please contact your authorized BMW center.** Should you need additional assistance, you may contact BMW Customer Relations and Services at 1-800-525-7417, or via email at CustomerRelations@bmwusa.com.

If your BMW center is unable to remedy the defect without charge or within a reasonable period of time, you may notify the Administrator, National Highway Traffic Safety Administration, 1200 New Jersey Ave., S.E., Washington, DC 20590; call the toll-free Vehicle Safety Hotline at 1-888-327-4236 (TTY: 1-800-424-9153); or go to <http://www.safercar.gov>.

BMW recommends that you always wear your safety belt, and that all passengers are properly seated and restrained at all times.

BMW OF NORTH AMERICA, LLC

nhtsa_recall_number	Volume	Do Not Drive?
00V-010	190	YES
00V-048	17,700	NO
00V-261	490	NO
00V-341	2,643	NO
00V-383	1,914	NO
01V-001	3,167	NO
01V-030	13,791	NO
01V-173	47	NO
01V-195	13,721	NO
01V-196	14,300	NO
01V-197	36	NO
01V-206	76,469	NO
01V-245	2,438	NO
01V-352	1,318	NO
02V-057	4,672	NO
02V-088	799	NO
02V-138	1,550	NO
02V-150	8,412	NO
02V-194	34,860	NO
02V-201	3,531	NO
02V-223	20,500	NO
03V-001	84,000	NO
03V-032	2,635	NO
03V-086	5,110	NO
03V-124	1,056	NO
03V-160	13,100	NO
03V-197	357	NO
03V-214	180	NO
03V-240	5,470	NO
03V-324	2,400	NO
03V-421	23,000	NO
03V-475	350	NO
04V-182	13,769	NO
04V-183	25,270	NO
04V-247	51	NO
04V-303	7,532	NO
04V-344	4,102	YES
04V-348	1,193	NO
04V-379	3,940	NO
04V-402	297	NO
04V-409	358	NO
04V-575	17,905	NO
05V-367	165	NO
05V-470	960	NO
05V-504	240	NO
06V-187	40	NO
06V-277	11,640	NO
06V-400	25	NO
07E-069	675	NO
07V-178	225	NO
07V-391	6,595	NO

07V-479	29,250	NO
07V-533	320	NO
08V-170	55	NO
08V-384	200,000	NO
08V-507	560	NO
08V-595	2,500	NO
08V-657	28,450	NO
09V-255	96	NO
09V-257	2,350	NO
09V-327	195	NO
09V-474	205	NO
10V-025	210	NO
10V-047	1,190	NO
10V-152	735	NO
10V-233	296	NO
10V-254	31,935	NO
10V-331	6,080	NO
10V-446	198,352	NO
10V-518	20,750	NO
11V-299	75	NO
11V-332	923	NO
11V-341	50	NO
11V-438	200,000	NO
11V-441	2,120	NO
11V-476	190	NO
11V-521	32,084	NO
12V-008	90,368	NO
12V-019	6	NO
12V-126	367,682	NO
12V-161	2,846	NO
12V-176	7,600	NO
12V-267	2,642	NO
12V-302	162	NO
12V-475	696	YES
12V-502	45,500	NO
12V-504	7,485	NO
12V-550	29,800	NO
13V-017	360	NO
13V-044	516,791	NO
13V-045	30,365	NO
13V-172	42,080	NO
13V-339	1,540	NO
13V-407	134,100	NO
13V-454	76,190	NO
13V-564	76,565	NO
13V-570	3	NO
14V-176	156,137	NO
14V-202	6,400	NO
14V-422	27	NO
14V-428	573,935	NO
14V-619	5,805	NO
14V-627	8,988	NO
14V-648	53	NO

14V-650

11 NO

3,398,296

nhtsa_recall_number	Volume	Do Not Drive?
00V-144	474	NO
00V-267	417	NO
00V-264	2,368	NO
00V-266	188	NO
00V-289	1,636	NO
00V-318	718	NO
01V-002	174	NO
01V-047	1,183	NO
01V-198	990	NO
01V-217	3,342	NO
01V-246	2,997	NO
01V-272	1,090	NO
02V-140	522	NO
02V-190	576	NO
02V-191	577	NO
02V-319	515	NO
03V-325	1,397	NO
03V-483	7,000	NO
04V-028	39,000	NO
04V-236	1,560	NO
04V-235	84	NO
04V-297	99	NO
04V-304	181	NO
04V-438	380	NO
04V-576	485	NO
05V-082	3,084	NO
05V-172	500	NO
05V-363	331	NO
06V-104	453	NO
06V-134	9,260	NO
06V-164	13,200	NO
06V-399	700	NO
06V-486	144	YES
07V-066	6,631	NO
07V-151	305	YES
07V-368	425	YES
07V-367	173	YES
07V-376	764	YES
07V-466	510	YES
08V-106	1,391	NO
08V-111	744	NO
08V-241	1,980	NO
08V-239	39	NO
08V-245	548	NO
08V-254	4,922	NO
08V-290	46	NO
08V-342	428	NO

08V-564	365	NO
08V-692	509	NO
08V-693	373	NO
09V-088	754	NO
09V-129	893	NO
09V-202	1,297	NO
09V-256	1,535	NO
09V-319	4,839	NO
09V-384	1,351	NO
09V-471	2,019	NO
09V-499	4,498	NO
10V-274	1,916	NO
10V-273	1,807	NO
10V-275	2,070	NO
10V-276	15,532	NO
10V-328	1,900	NO
10V-488	11,826	NO
10V-496	1,780	NO
12V-177	1,414	NO
12V-487	2,483	NO
12V-556	266	NO
12V-585	2,385	NO
13E-030	195	NO
13V-154	15	NO
13V-279	870	NO
13V-526	2,475	NO
13V-549	2,608	NO
13V-617	50,184	NO
14V-065	4,453	NO
14V-211	1,420	NO
14V-264	1,360	NO
14V-320	950	YES

240,873

nhtsa_recall_number	Volume	Do Not Drive?
06V-327	32	NO
10V-447	2,552	NO
11V-522	589	NO
12V-166	69	NO
12V-368	10	NO
13V-047	27	NO
	3,279	

nhtsa_recal

I_number Volume

BMW & MINI	Volume
00V-010	190
04V-344	4,102
12V-475	696
Total =	4,988
Motorcycle s	
06V-486	144
07V-151	305
07V-368	425
07V-367	173
07V-376	764
07V-466	510
14V-320	950
Total =	3,271
Grand Total	8,259

	All
BMW & MINI	3,398,296
Rolls-Royce	3,279
Motorcycles	240,873
TOTAL	3,642,448