



PORSCHE

OFFICE OF DEFECTS &
INVESTIGATIONS

2013 JUL 30 A 8:28

VIA FEDERAL EXPRESS

July 26, 2013

Mr. Jeff L. Quandt, Chief
Vehicle Control Division
Office of Defects Investigation
National Highway Traffic Safety Administration
400 Seventh Street, S.W., Room 5319
Washington, D.C. 20590

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

RE: Preliminary Evaluation (NVS-213 swm / PE13-009)

Dear Mr. Quandt:

This letter and the attached report and enclosure are in response to your letter dated May 9, 2013 to Mr. David Geiger. As agreed with staff we are responding to the first eight requests contained in your letter; we will address the remaining requests by September 12, 2013. In addition, as agreed with staff, we have limited the scope of the subject and peer vehicles to include only those models (911 Turbo, 911 GT2, and 911 GT3) which contain coolant pipes which use an adhesive to secure the pipes to the engine.

Should you have any additional questions please do not hesitate to contact me at (770) 290-3627.

Sincerely,

A handwritten signature in blue ink, appearing to read "W. Lewis".

Walter J. Lewis, Manager
Regulatory Affairs

Enclosures

Cc: Stephen McHenry (via e-mail)

PORSCHE

National Highway Traffic Safety Administration – NVS-213 svm / PE13-009

July 26, 2013

Page 1

1. State, by engine/cooling system, model and model year, the number of subject and peer vehicles Porsche has manufactured for sale or lease in the United States and federalized territories. Separately, for each subject and peer vehicle manufactured to date by Porsche, state the following:
 - a. Vehicle identification number (VIN);
 - b. Make;
 - c. Model;
 - d. Platform designation (e.g., 996 or 997);
 - e. Model Year;
 - f. Engine;
 - g. Date of manufacture;
 - h. Date warranty coverage commenced; and
 - i. The State in the United States (or federalized territory) where the vehicle was originally sold or leased (or delivered for sale or lease).

Provide the table in Microsoft Access 2010, or a compatible format, entitled "PRODUCTION DATA." See Enclosure 1, Data Collection Disc, for a pre-formatted table which provides further details regarding this submission.

1. Enclosed is a CD containing the above information requested in the appropriate format. The file is in Excel format and named "PRODUCTION_DATA.xlsx". The number of subject and peer vehicles by model and model year is given in the worksheet labeled "OVERVIEW." The individual data for each specific VIN (i.e. engine code, model, platform, model year, etc.) is given in the worksheet labeled "INDIVIDUAL_DATA."

PORSCHE

National Highway Traffic Safety Administration – NVS-213 svm / PE13-009

July 26, 2013

Page 2

2. State, by model and model year, the number of subject and peer vehicles Porsche has manufactured for sale or lease in the United States and federalized territories for which Porsche sold an extended service plan. Separately, for each vehicle, state the following (if a vehicle had more than one plan, such as a maintenance plan and an extended service repair plan, then list the vehicle separately for each plan that it had):
 - a. Vehicle identification number (VIN);
 - b. Make;
 - c. Model;
 - d. Model Year;
 - e. Name of the extended service plan;
 - f. The mileage at which the extended service plan expires; and
 - g. The number of months from the warranty start date at which the extended service plan expires.

Provide the table in Microsoft 2010, or a compatible format, entitled "EXTENDED SERVICE PLAN DATA." See Enclosure 1, Data Collection Disc, for a pre-formatted table which provides further details regarding this submission.

2. Please be aware that Porsche did not offer extended service or maintenance plans for the subject or peer vehicles.

PORSCHE

National Highway Traffic Safety Administration – NVS-213 svm / PE13-009

July 26, 2013

Page 3

3. 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 alleged defect in the subject and peer vehicles:
- a. Consumer complaints, including those from fleet operators;
 - b. Field reports, including dealer field reports;
 - c. Reports from the Porsche Club of America Inc.;
 - d. Reports involving a crash, injury or fatality;
 - e. Property damage claims; and
 - f. Third-party arbitration proceedings where Porsche is or was a party to the arbitration; and
 - g. Lawsuits, both pending and closed, in which Porsche is or was a defendant or codefendant.

For subparts “a” through “e” 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).

In addition, for items “d” through “g” 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. 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.

3. The enclosed CD contains a file named “COMPLAINTS_OVERVIEW.xlsx.” The worksheet label “OVERVIEW” contains a table of all the relevant reports. There were 11 relevant consumer complaints and 5 field reports.

Please note Porsche does not have a dedicated system for tracking communications involving complaints from the Porsche Club of America, Inc. Any such complaints from PCA would likely have been handled as a normal customer complaint.

PORSCHE

National Highway Traffic Safety Administration – NVS-213 svm / PE13-009

July 26, 2013

Page 4

4. Separately, for each item (complaint, report, claim, notice, or matter) within the scope of your response to Request No. 3, state the following information:

- a. Porsche's file number or other identifier used;
- b. The category of the item, as identified in Request No. 3 (i.e., consumer complaint, field report, etc.);
- c. Vehicle owner or fleet/club name (and fleet/club 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;
- h. Report or claim date;
- i. Whether a crash is alleged;
- j. Whether property damage is alleged;
- k. Number of alleged injuries, if any; and
- l. Number of alleged fatalities, if any

Provide this information in Microsoft Access 2010, or a compatible format, entitled "COMPLAINT DATA." See Enclosure 1, Data Collection Disc, for a pre-formatted table which provides further details regarding this submission.

4. The enclosed CD contains a file named "COMPLAINTS_DATA.xlsx." The worksheet labeled "INDIVIDUAL_DATA" contains requested data.

PORSCHE

National Highway Traffic Safety Administration – NVS-213 svm / PE13-009

July 26, 2013

Page 5

5. Produce copies of all documents related to each item within the scope of Request No. 3. Organize the documents separately by category (i.e., consumer complaints, field reports, etc.) and describe the method Porsche used for organizing the documents.

5. The enclosed CD contains PDF copies of all field reports mentioned in the response to Request No. 3 in the file named "FieldReports.pdf." The enclosed CD also contains PDF copies of the customer complaints mentioned in response to Request No. 3 in the file named "CustomerComplaints.pdf."

PORSCHE

National Highway Traffic Safety Administration – NVS-213 svm / PE13-009

July 26, 2013

Page 6

6. State, by model and model year, a total count for all of the following categories of claims, collectively, that have been paid by Porsche to date that relate to, or may relate to, repairs of loose, leaking or separated subject components in the subject and peer vehicles: 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. Porsche's claim number;
 - b. Vehicle owner or fleet name (and fleet contact person) and telephone number;
 - c. VIN;
 - d. Repair date;
 - e. Vehicle mileage at time of repair;
 - f. Repairing dealer's or 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. Whether there is a related claim for towing (any towing claim filed with a week of the cooling system repair date);
 - k. Concern stated by customer; and
 - l. Comment, if any, by dealer/technician relating to claim and/or repair.

Provide this information in Microsoft Access 2010, or a compatible format, entitled "WARRANTY DATA." See Enclosure 1, Data Collection Disc, for a pre-formatted table which provides further details regarding this submission.

6. The enclosed CD contains a file named "WARRANTY DATA.xlsx" which contains the requested information. The worksheet labeled "OVERVIEW" contains a summary table of all the claims broken down by model and model year. The worksheet labeled "INDIVIDUAL_DATA" contains all of the claim details.

PORSCHE

National Highway Traffic Safety Administration – NVS-213 svm / PE13-009

July 26, 2013

Page 7

7. Describe in detail the search criteria used by Porsche to identify the claims identified in response to Request No. 6, 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 and peer vehicles. State, by make and model year, the terms of the new vehicle warranty coverage offered by Porsche on the subject and peer 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 Porsche offered for the subject and peer vehicles and state by option, model, and model year, the number of vehicles that are covered under each such extended warranty. Also indicate which plans, if any, would cover the subject component.
7. All warranty records involving the replacement of the relevant coolant pipe part numbers for the subject and peer vehicles were extracted from Porsche's warranty database to respond to Request No. 6. We have retained the copy of the database query used to respond to Request No. 6. Please let us know if you wish to review the query.

The enclosed CD contains a file named "Labor Operation Description.xlsx" which contains the labor operations description that are given in each of warranty records contained in the response to Request No. 6. The enclosed CD also contains a file named "Problem Code Description.xlsx" which contains the problem code descriptions that are given in each of warranty records contained in the response to Request No. 6.

All model year 2001 through 2011 models were subject to the following warranties:

- 1) Replacement Parts and Accessories Limited Warranty
2 years / unlimited mileage
- 2) Federal Emissions Design and Defects Warranty
2 years / 24,000 miles
- 3) California Emission Performance and Defects Warranty
(CA and Section 177 States only)
3 years / 50,000 miles
- 4) New Car Limited Warranty and Porsche Roadside Assistance Program
4 years / 50,000 miles

PORSCHE

National Highway Traffic Safety Administration – NVS-213 svm / PE13-009

July 26, 2013

Page 8

- 5) California Long-Term Emission Control System Defects Warranty
(CA and Section 177 States only)
7 years / 70,000 miles
- 6) Federal Emission Performance Warranty
8 years / 80,000 miles
- 7) Corrosion Limited Warranty
10 years / unlimited mileage
(The warranty for 2004 – 2008 911 GT3 and 2010 – 2011 911 GT2/GT3
was for 4 years / unlimited mileage)

Porsche did not offer any extended warranty coverage options for any of the subject or peer vehicles.

PORSCHE

National Highway Traffic Safety Administration – NVS-213 svm / PE13-009

July 26, 2013

Page 9

8. Produce copies of all service, warranty, and other documents that relate to, or may relate to, the alleged defect in the subject and peer vehicles, that Porsche 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 Porsche is planning to issue within the next 120 days.

8. Porsche has not issued any of the above mentioned documents related to the alleged defect. Porsche currently has no plans to issue any similar documentation in the future.