

BMW Group

INFORMATION Redacted PURSUANT TO THE FREEDOM OF
INFORMATION ACT (FOIA), 5 U.S.C . 552(B)(6)

VIA FEDERAL EXPRESS

June 16, 2016

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

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2016 JUN 16 10 10 AM
NHTSA

**Re: General Order Directed to Motor Vehicle Manufacturers
Submission of Confidential Information**

Dear Mr. Yon:

BMW of North America, LLC, a subsidiary of BMW AG, Munich, Germany ("BMW"), is submitting the enclosed non-confidential information in response to NHTSA's April 14, 2016 General Order in the above-captioned matter. A portion of our response, which is requested to be afforded confidential treatment, has been submitted to the NHTSA Office of Chief Counsel, along with information supporting our request for confidentiality.

Should you have any questions, please contact me at (201) 571-5360.

Sincerely,



Samuel Campbell, III
Department Head
Safety Engineering & Intelligent Transportation Systems

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BMW of North America, LLC

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Enclosures:

Non-Confidential Information (1 Copy)

Cc:

P. Hemmersbaugh, NHTSA, Chief Counsel
K. Kolodziej, NHTSA, OCC (letter only)
B. Mykytiuk, NHTSA, OCC (letter only)
M. Lee, NHTSA, ODI



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**BMW Response to NHTSA General Order
Panoramic Sunroof
June 16, 2016**

NHTSA Request:

- 1. Describe the history of panoramic sunroofs in the vehicles you manufacture. Your response should include, but not be limited to, the reason(s) you decided to add panoramic sunroofs as an option, the model(s) and model year for which you first offered this option, and the timeline of the development and decision-making that led to the introduction of panoramic sunroofs.**

BMW Response:

BMW began the development of glass panel sunroofs in the late 1990s, and has offered panoramic sunroofs as a result of increasing customer demand related to the style and design of the vehicle.

The model(s) and model year of vehicles in which panoramic sunroofs were first offered as an option are contained in the following table.

| Model | Model Year |
|------------------------|-------------------|
| BMW 7 Series | 2016 |
| BMW X1 SAV | 2016 |
| MINI Cooper 2 Door | 2006 (1) |
| MINI Cooper Clubman | 2008 (2) |
| MINI Cooper Countryman | 2011 |
| MINI Cooper Paceman | 2013 |
| MINI Cooper 4 Door | 2015 |

(1): Offered as of Model Year 2002, but General Order pertains to Model Years 2006 – 2016.

(2): Not produced as a Model Year 2015.

NHTSA Request:

- 2. Identify and enumerate the total population of vehicles you manufactured that contain a panoramic sunroof as original equipment. Your response should be broken down by make, model, and model year.**

BMW Response:

The total population of vehicles containing a panoramic sunroof as original equipment by make, model, and model year is contained in the following table. Volumes represent production through May 31, 2016.

**BMW Response to NHTSA General Order
Panoramic Sunroof
June 16, 2016**

| Make | Model | Model Year | | | | | | | | | | | |
|------|-------------------|------------|--------|--------|--------|--------|--------|--------|--------|--------|--------|--------|--------|
| | | 2006 | 2007 | 2008 | 2009 | 2010 | 2011 | 2012 | 2013 | 2014 | 2015 | 2016 | |
| BMW | 7 Series | N/A | N/A | N/A | N/A | N/A | N/A | N/A | N/A | N/A | N/A | N/A | 7,848 |
| BMW | X1 SAV | N/A | N/A | N/A | N/A | N/A | N/A | N/A | N/A | N/A | N/A | N/A | 15,821 |
| MINI | 2 Door | 29,948 | 25,457 | 19,803 | 24,059 | 18,793 | 17,573 | 16,877 | 22,718 | 8,224 | 15,669 | 6,325 | |
| MINI | Cooper Clubman | N/A | N/A | 6,812 | 10,825 | 6,220 | 5,318 | 3,941 | 3,839 | 2,347 | N/A | 5,256 | |
| MINI | Cooper Countryman | N/A | N/A | N/A | N/A | N/A | 9,047 | 18,644 | 12,080 | 14,905 | 14,075 | 11,064 | |
| MINI | Cooper Paceman | N/A | N/A | N/A | N/A | N/A | N/A | N/A | 2,040 | 1,506 | 1,484 | 106 | |
| MINI | Cooper 4 Door | N/A | N/A | N/A | N/A | N/A | N/A | N/A | N/A | N/A | 9,673 | 9,587 | |

NHTSA Request:

- 3. For each panoramic sunroof identified in your Response to Request No. 2, provide the following information: (i) the name and contact information for the sunroof manufacturer; (ii) the number of glass panels; (iii) the size of the glass panel(s) (length x width in centimeters); (iv) the thickness of the glass panel(s) (millimeters); and (v) the standard to which the sunroof was manufactured. Your response should include an explanation of any changes made between models and model years.**

BMW Response:

Please refer to Attachment "CONF-NHTSA-General-Order-Panoramic-Sunroof-Response-Q3-(16Jun2016).xlsx" which contains the requested information.

NHTSA Request:

- 4. Identify, by make, model, and model year, the number of incidents involving an allegation that a panoramic sunroof has spontaneously shattered, and state the number of injuries or fatalities associated with such incidents.**

BMW Response:

The number of incidents containing an allegation that a panoramic sunroof has spontaneously shattered, and the number of injuries associated with such incidents by make, model, and model year is contained in the following table.

| Make | Model | Model Year – Incidents / Injuries | | | | | | | | | | |
|------|-------------------|-----------------------------------|-------|-------|-------|-------|-------|-------|-------|-------|-------|------|
| | | 2006 | 2007 | 2008 | 2009 | 2010 | 2011 | 2012 | 2013 | 2014 | 2015 | 2016 |
| MINI | Cooper 2 Door | 2 / 0 | 4 / 1 | 3 / 0 | 6 / 1 | 3 / 1 | 4 / 0 | 3 / 0 | 3 / 0 | 2 / 0 | 0 | 0 |
| MINI | Cooper Clubman | N/A | N/A | 2 / 0 | 2 / 0 | 0 | 0 | 0 | 0 | 0 | N/A | 0 |
| MINI | Cooper Countryman | N/A | N/A | N/A | N/A | N/A | 0 | 2 / 0 | 6 / 0 | 0 | 1 / 0 | 0 |

**BMW Response to NHTSA General Order
Panoramic Sunroof
June 16, 2016**

NHTSA Request:

- 5. File a report of every incident involving an allegation that a panoramic sunroof has shattered spontaneously in a vehicle manufactured by you, of which you are aware by any means (including but not limited to consumer complaints, lawsuits, and media reports). The report shall include the following information: (i) the date on which you were first notified or learned of the incident; (ii) the name of the individual involved in the incident; (iii) the contact information for counsel representing that individual (if applicable); (iv) the make, model, and model year of the vehicle; (v) the vehicle identification number (VIN); (vi) the date, location, and description of the incident (including whether the vehicle was stationary or in motion when the incident occurred); (vii) the number and description of any injuries or fatalities; (viii) a summary of your current understanding as to the nature of the incident and/or the cause of the breakage (including whether a rock or other item of road debris was found); and (ix) a summary of any other information relevant to your investigation of the incident. Your report should be in the format attached as Exhibit A.**

BMW Response:

Please refer to Attachment "CONF-NHTSA-General-Order-Panoramic-Sunroof-Exhibit-A-(16Jun2016).xlsx" which contains the requested information.

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NHTSA-BMW-GenOrder-
Sunroof-
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