



Porsche Cars North America
One Porsche Drive
Atlanta, GA 30354

March 31, 2021

Stephen Ridella, PhD
Director, Office of Defects Investigation
National Highway Traffic Safety Administration
1200 New Jersey Avenue, SE
Washington, D.C. 20590

**Re: Defect Petition 21-001 to Investigate Allegations of Backup Lights Failing to
Illuminate; Response to Information Request**

Dear Dr. Ridella,

Porsche Cars North America ("Porsche") is submitting its response to the National Highway Traffic Safety Administration ("NHTSA" or "Agency") in response to the Office of Defects Investigation's February 4, 2021 request for information relating to the defect petition received by the Agency regarding allegations of backup lights failing to illuminate when the gear is shifted into reverse in certain 2012-2014 model year ("MY") Porsche 911 Carrera S vehicles equipped with a 7-speed manual transmission.

Request Nos. 1-9 of your February 4, 2021 letter are repeated below, followed by the corresponding response.

Request No. 1

State, by model and model year, the number of subject vehicles Porsche has manufactured for sale or lease in the United States. Separately, for each subject vehicle manufactured to date by Porsche, state the following:

- a. Vehicle identification number (VIN);*
- b. Make;*
- c. Model;*
- d. Model Year;*
- e. Subject component part number(s) and design version(s) installed as original equipment;*
- f. Date of manufacture;*
- g. Date warranty coverage commenced; and*
- h. 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 2010, or a compatible format, entitled “PRODUCTION DATA.”

Response to Request No. 1

The requested information is provided in Attachment 1, Production Data.¹ Please note that the subject component, the backup light actuator, is located inside the transmission in the subject vehicles and does not have a separate part number. Part number information therefore is not included in Attachment 1.

Porsche gathered information responsive to this Request through review of its production data. Porsche last gathered information responsive to this Request in March 2021.

Request No. 2

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 vehicles:

- a. Consumer complaints, including those from fleet operators;*
- b. Field reports, including dealer field reports;*
- c. Reports involving a crash, injury or fatality;*
- d. Property damage claims; and*
- e. Third-party arbitration proceedings where Porsche is or was a party to the arbitration; and*
- f. Lawsuits, both pending and closed, in which Porsche is or was a defendant or codefendant.*

For subparts “a” through “f” 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 “c” through “f”² provide a summary description of the alleged problem and causal and contributing factors and Porsche assessment of the problem, with a summary of the significant underlying facts and evidence. For items “e” and “f” identify the parties to the

¹ Attachment 1 includes production data for all Model Year 2012-2014 911 model variants with the same MT11 manual seven gear transmission manufactured by ZF Friedrichshafen AG (“ZF”) as the 911 Carrera S. The response is not limited to the 911 Carrera S, which is a subset of all 911 models with this transmission.

² NHTSA’s information request letter asked for this summary information for items “a” through “f,” but Porsche believes the Agency intended to request it for items “c” through “f.” If additional information is requested, please let us know.

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action, as well as the caption, court, docket number, and date on which the complaint or other document initiating the action was filed.

Response to Request No. 2

- a) Porsche has identified [] customer complaints from one vehicle owner that relate to, or may relate to, the alleged defect in the subject vehicles.
- b) Porsche has identified [] field report that relates to, or may relate to, the alleged defect in the subject vehicles.
- c) Porsche has not identified any reports involving a crash, injury or fatality that relate to, or may relate to, the alleged defect in the subject vehicles.
- d) Porsche has not identified any property damage claims that relate to, or may relate to, the alleged defect in the subject vehicles.
- f) Porsche has not identified any arbitration proceedings where Porsche is or was a party that relate to, or may relate to, the alleged defect in the subject vehicles.
- g) Porsche has not identified any lawsuits in which Porsche is or was a defendant or codefendant that relate to, or may relate to, the alleged defect in the subject vehicles.

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Porsche last gathered information responsive to this Request in March 2021.

Request No. 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. *Porsche'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), street address, email 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 “REQUEST NUMBER TWO DATA.”

Response to Request No. 3

The requested information is provided in Attachment 2, Request Number Two Data.

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] Porsche last gathered information responsive to this Request in March 2021.

Request No. 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 Porsche used for organizing the documents. Describe in detail the search methods and search criteria used by Porsche to identify the items in response to Request No. 2.

Response to Request No. 4

The requested information is provided in Attachment 3, Request Number Two Documents. This information is organized by category: consumer complaints; and field report.

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Porsche last gathered information responsive to this Request in March 2021.

Request No. 5

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, the alleged defect in the subject 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;

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- b. *Vehicle owner or fleet name (and fleet contact person), street address, email address 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. *Replacement part number(s) and description(s);*
- h. *Concern stated by customer;*
- i. *Cause as stated on the repair order;*
- j. *Corrective action as stated on the repair order; and*
- k. *Additional comments, 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."

Describe in detail the search methods and search criteria used by Porsche to identify the claims in response to Request No. 5.

State, by make and model year, the terms of the new vehicle warranty coverage offered by Porsche 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 Porsche 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 to Request No. 5

The requested warranty claim information is provided in Attachment 4, Warranty Data.

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The Porsche warranty coverage for new vehicles is four years/50,000 miles. Porsche does not offer any extended warranty options for new vehicles.

Porsche last gathered information responsive to this Request in March 2021.

Request No. 6

Produce copies of all service, warranty, and other documents that relate to, or may relate to, the alleged defect in the subject 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.

Response to Request No. 6

The requested information is provided in Attachment 5, Service and Warranty Documents.

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] Porsche last gathered information responsive to this Request in March 2021.

Request No. 7

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, Porsche. 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 to Request No. 7

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information responsive to this Request in March 2021.

] Porsche last gathered

Request No. 8

Describe all modifications or changes made by, or on behalf of, Porsche 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. 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 number(s) (service and engineering) of the original component;*
- e. The part number(s) (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 Porsche is aware of which may be incorporated into vehicle production within the next 120 days.

Response to Request No. 8

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this Request in March 2021.

] Porsche last gathered information responsive to

Request No. 9

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Furnish Porsche'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; and*
- e. What warnings, if any, the operator and the other persons both inside and outside the vehicle would have that the alleged defect was occurring or subject component was malfunctioning; and*
- f. The reports included with this inquiry.*

Response to Request No. 9

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(a) The causal or contributory factor(s)

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(b) The failure mechanism(s);

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(c) The failure mode(s);

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- (d) The risk to motor vehicle safety that it poses; and
- (e) What warnings, if any, the operator and the other persons both inside and outside the vehicle would have that the alleged defect was occurring or subject component was malfunctioning; and

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- (f) The reports included with this inquiry.**

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For all the reasons stated above, Porsche has determined that the alleged defect does not present an unreasonable risk to motor vehicle safety. Changes to the reverse light stopper plate were made as part of the company's continuous product improvement efforts. Warranty replacement rates are extremely low; indeed, replacement rates for the alleged defect are lower than general background warranty replacement rates for all subject vehicle transmissions. Ample warnings are provided to any driver that experiences the reverse light issue, and this issue can occur for a wide range of reasons, including variability in the attachment weld and metallurgy, vibration, and individual driving behavior. There is no unreasonable risk to motor vehicle safety, and Porsche has addressed this customer satisfaction issue with a warranty extension.

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responsive to this Request in March 2021.] Porsche last gathered information

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Please let us know if you have any questions regarding this submission.

Sincerely,

A handwritten signature in black ink, appearing to read 'Jim Moore', with a large, stylized initial 'J'.

Jim Moore
Manager, In-Use Vehicle Conformity
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