

Robert Bosch LLC
Supplemental Response to March 28, 2024 Information Request
NHTSA Investigation EA23001

This supplemental response to the Agency’s March 28, 2024 Information Request (IR) is submitted on behalf of Robert Bosch LLC (Bosch LLC) in the above-referenced investigation. Bosch previously provided responsive information to NHTSA on June 14, 2024. As explained in the June 14th response, although the IR was directed to Bosch LLC, the subject CP4 high pressure fuel pumps were designed and manufactured through Robert Bosch GmbH (Bosch GmbH) in Germany for global customers. Consequently, to best cooperate and assist NHTSA with this IR, Bosch LLC provides most of the information and responses by and through Bosch GmbH. Bosch LLC and Bosch GmbH are separate and distinct legal entities, but for convenience, collectively they are referred to as “Bosch” herein.

Following discussions with personnel from the Office of Defects Investigation (ODI), Bosch is supplementing its prior response with additional information requested by NHTSA. Additionally, Bosch is supplementing its prior response with information related certain CP4 variants produced and sold for the U.S. independent aftermarket (IAM).

This response was prepared pursuant to a diligent search for the requested information. The scope of Bosch’s search for responsive information focused on the locations where responsive information is most likely to be maintained and on review of Bosch files and information systems in which responsive information ordinarily would be expected to be found and to which Bosch ordinarily would refer.

To the extent that the Agency’s definition of Bosch includes agents, contractors, consultants, attorneys and law firms and other persons or entities over which Bosch does not exercise day-to-day operational control, we note that information belonging to such persons or entities ordinarily is not in Bosch’s possession, custody, or control. Also, Bosch is providing responsive information only insofar as such information is not subject to the attorney-client privilege or attorney work product doctrine.

Supplements to Responses to NHTSA’s Requests

Responses to the Agency’s Requests are set forth below. As requested, after each numeric designation, we have set forth verbatim the request for information, followed by our response. Unless otherwise stated, information reflects data collected as of June 14, 2024.

Request No. 1

State the number of subject components Bosch has manufactured for subject vehicles or as replacement parts. Separately, for each subject component manufactured to date by Bosch, state the following:

- a. Vehicle identification number (17-character VIN) of recipient vehicle;*

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- b. Make of recipient vehicle;*
- c. Model of recipient vehicle;*
- d. Model Year of recipient vehicle;*
- e. Whether it was installed as original equipment or as replacement part;*
- f. Part number and design version/variant;*
- g. Part serial number or other identifying mark;*
- h. Date of manufacture of subject component (MM/DD/YYYY); and*
- i. Date warranty coverage commenced of subject component (MM/DD/YYYY).*

Provide the information in Microsoft Access 2010, or a compatible format, entitled "PRODUCTION DATA." A pre-formatted data collection file, which provides further details regarding this submission, will be provided to you.

Response to Request No. 1

As discussed with ODI, Bosch is supplementing its June 14, 2024 response to Request Nos. 1 and 14. This supplement provides additional information to assist NHTSA in sorting and analyzing the previously submitted data. Bosch also added additional part numbers, due to subsequently learning the particular engine/vehicle system may have been sold in the U.S. In addition, Bosch corrected some typographical errors. All changes are highlighted in yellow to ease identification. Please refer to Bosch's June 14, 2024 response, for further details regarding the data.

Supplemental information responsive to Request No. 1 and Request No. 14 is contained in the file, "Bosch - Supplemental CP4 Variant Details_CONF BUS INFO.xlsx," which is being submitted in a request for confidential treatment under 49 CFR Part 512.

Additionally, Bosch's review of CP4 variants produced for, and sold in, the U.S. independent aftermarket identified some part numbers that corresponded to original-equipment variants identified in its initial response to Request No. 1 and Request No. 14. Accordingly, Bosch is providing detailed sales numbers, which include total volumes, detailed customer information, and the corresponding part numbers in the file "Bosch - CP4 IAM Sales Data_CONF BUS INFO.xlsx." Additionally, Bosch is providing a table that cross references the aftermarket part numbers with original-equipment part numbers in the file "Bosch - CP4 IAM Cross Reference Table_CONF BUS INFO.xlsx." The IAM-related data is also being submitted in Bosch's request for confidential treatment.

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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 Bosch 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.

- a. Bosch's claim number;*
 - b. Vehicle owner, customer (OEM or otherwise), or fleet name (and fleet contact person), email address and telephone number (please use distinct fields for each data type);*
 - c. Vehicle owner, customer (OEM or otherwise), or fleet street address, city, state (postal abbreviation), and ZIP code (please use distinct fields for each data type);*
 - d. 17-character VIN;*
 - e. Vehicle's make/model/model year (please use distinct fields for each data type);*
 - f. Repair date (MM/DD/YYYY);*
 - g. Vehicle mileage at time of repair (numeric data type);*
 - h. Repairing dealer's or facility's name, telephone number, city and state or ZIP code (please use distinct fields for each data type);*
 - i. Problem code(s) and/or diagnostic trouble code(s);*
 - j. Replacement part number(s) and description(s);*
 - k. Concern stated by customer;*
 - l. Whether customer alleges a loss of motive power;*
 - m. Whether subject component was evaluated/analyzed by Bosch;*
 - n. Root cause of subject component malfunction;*
 - o. Cause as stated on the repair order;*
 - p. Correction as stated on the repair order; and*
 - q. 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." A pre-formatted data collection file, which provides further details regarding this submission, will be provided to you.*

Response to Request No. 5

As explained in the June 14, 2024 written response, Bosch identified CP4 variants that it sold into the U.S. independent aftermarket (i.e., the IAM units). Bosch is now supplementing its prior response with potentially responsive warranty data related to these IAM units. The supplemental information provides data related to returns from Bosch's customers (U.S. retailers and distributors), including total returns (with separate breakdowns down by part number and by Bosch's customer) and a table with relevant details available for these returns.

Bosch is submitting this warranty data in its request for confidential treatment in the file name "Bosch - CP4 IAM Warranty Data_CONF BUS INFO.xlsx."

Request No. 6

Describe in detail the search methods and search criteria used by Bosch to identify the claims in response to Request No. 5, including the, [sic] problem codes and/or diagnostic trouble codes, part numbers and any other pertinent parameters used.

Response to Request No. 6

To gather potentially responsive data related to the IAM units discussed in the response to Request No. 5, Bosch queried the relevant databases used for tracking IAM returns from U.S. customers (distributors or retailers). Detailed warranty information was collected for all categories of returns. The categories for returns are listed in column V on the “CBI - Warranty Credit Data” tab in the spreadsheet “Bosch - CP4 IAM Warranty Data_CONF BUS INFO.xlsx.” As a matter of general practice, Bosch’s customers do not routinely provide consumer information related to IAM purchases to Bosch. Consequently, Bosch’s database search did not locate detailed information related to individual consumers (such as purchaser’s name, individual vehicle information, mileage, etc.).

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Request No. 14

Provide a summary of sales of the subject component, or components of substantially similar design, to OEMs and aftermarket. Organize your answer by purchaser, production month, pump variant, and make/model/model year, if applicable. For each separate purchaser provide contact information: Company name, contact person, phone number, and email address.

Response to Request No. 14

As explained in the supplemental response to Request No. 1, Bosch is supplementing its prior response to Request Nos. 1 and 14.

As also explained in response to Request No. 1, Bosch is also providing detailed sales data for IAM units sold to U.S. customers (distributors or retailers) as well as a table that cross references the IAM part numbers with the relevant original-equipment part number.

Due to the European Union’s General Data Protection Regulation (GDPR) regulations, Bosch has not provided individual contact information at this time. To the extent necessary, Bosch can identify a U.S. contact for each OEM or IAM customer at NHTSA’s request.

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