



04 V-593  
(4 pages)

2004 DEC 15 A 9:25

DEPT. OF INVESTIGATION

VIA UPS  
December 9, 2004

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

Mr. Kenneth N. Weinstein  
Associate Administrator for Enforcement  
National Highway Traffic Safety Administration  
400 Seventh Street, S.W. (NVS-200)  
Washington, D.C. 20590

RE: Noncompliance Notification Report for the Model Year 2003-2005 Porsche Cayenne,  
Cayenne S and Cayenne Turbo

Dear Mr. Weinstein:

On behalf of Dr. Ing. h.c.F. Porsche AG, Porsche Cars North America, Inc. is filling this noncompliance report pursuant to the provisions of Part 573 of Title 49 of the Code of Federal Regulations.

573.6 (c) (1)

Manufacturer: Dr. Ing. h.c.F. Porsche AG (PAG)  
70435 Stuttgart  
Germany

Importer: Porsche Cars North America, Inc. (PCNA)  
980 Hammond Drive  
Suite 1000  
Atlanta, GA 30328

Agent designated by  
Manufacturer: General Counsel  
Porsche Cars North America, Inc.  
980 Hammond Drive  
Suite 1000  
Atlanta, GA 30328



573.6 (c) (2) (i)

Identification: 2003 - 2005 Cayenne, Cayenne S and Cayenne Turbo

573.6 (c) (3)

Total number of vehicles affected: To be determined.

573.6 (c) (4)

Percentage of vehicles affected: 100%.

573.5 (c) (5)

Description of the noncompliance:

The vehicles failed to comply with FMVSS 208 S7.1.1.5 with regard to the activation of the seat belt locking feature in the outboard rear seating positions. These seat positions are equipped with seat belt retractors that have a locking feature that converts the retractor from an emergency locking retractor (ELR) mode to an automatic locking retractor (ALR) mode for the purposes of child restraint installation. The belts convert to the ALR mode after the webbing has been drawn fully out of the retractor. As the belt is then released into the retractor, the system remains in the ALR mode so that the belt can be tensioned for securing a child restraint. However, for the rear outboard-seating positions the ALR mode deactivates to the ELR mode at a point before all of the webbing of a belt, in which the latch plate has been inserted into the buckle, has been fed back into the retractor. As a result, the belt may deactivate the ALR mode with certain child restraints, which have a short belt routing path so that such child restraints are not securely installed within the meaning of the requirement.

The seat belt in the center rear seating position remains in the ALR mode until all of the webbing of a belt (that has been buckled) has been returned to the retractor and therefore this seating position is in full compliance.

573.6 (c) (6)

Basis for defect  
determination:

We were made aware of a complain(s) received from customer(s) by NHTSA. An investigation of our customer complaint database did not reveal any similar complaints. The investigation was expanded to include internal testing, VWVWoA information, that finally resulted in a meeting with NHTSA where additional information was received. All the information together led to the determination of the noncompliance.

573.6 (c) (7)

Noncompliance test: To be determined.

573.5 (c) (8)

Program for  
remedying the  
noncompliance: To be determined.

573.5 (c) (9)

Notices: Not applicable.

573.5 (c) (10)

Copy of proposed  
owner notification: To be determined.

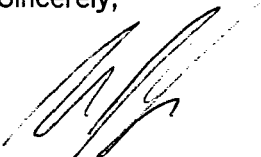
573.5 (c) (11)

Manufacturer  
campaign number: To be determined.

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Should you have any questions or require further information, please do not hesitate to contact me at (770) 290-3627.

Sincerely,

A handwritten signature in black ink, appearing to read 'W. Lewis', written over a faint dotted line.

Walter J. Lewis, Manager  
Regulatory Affairs