



July 06, 2009

Mr. Daniel C. Smith
Associate Administrator for Safety Assurance
National Highway Traffic Safety Administration
1200 New Jersey Avenue, SE/W45-231
Washington, DC 20590



Dear Mr. Smith:

Subject: Land Rover Recall Number P018 – 2009 Model Year Land Rover Range Rover vehicles for Front Windshield Primer Application

Pursuant to 49 CFR 573, Defect and Noncompliance Responsibility and Reports, Jaguar Land Rover North America, LLC is submitting updated information concerning a recall that is being voluntarily initiated. From the initial July 1, 2009 submission on this matter, the attached document contains a corrected VIN range and vehicle population.

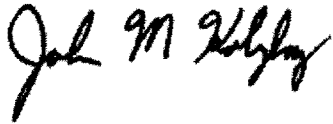
Summary

- **Action** – Land Rover is conducting a voluntary safety recall involving 2009 Model Year Land Rover Range Rover vehicles built at the Solihull (UK) Assembly Plant from April 17, 2009 through to May 12, 2009 to inspect for the presence of primer. Vehicles which have not received an application of primer will have the Front Windshield removed and re-bonded in line with existing service repair procedures. This action is necessary to conform with the requirements of FMVSS 212.
- **Number of Vehicles Involved** – 40 Range Rover vehicles in the United States and Federalized Territories.
- **Affect on Vehicle Operation** – Where the windshield has not received primer and is not chemically bonded, water ingress might occur and there may be reports of increased wind noise. In extreme cases, where there is no chemical bond between the windshield glass and the Polyurethane (PU) adhesive, full windshield retention may not be achieved in the event of an airbag deployment or during a vehicle crash.
- **Service Program** – Dealers will be instructed to remove the rear tailgate trim and perform a visual inspection on the rear tailgate glass for a witness mark to indicate the presence of primer. If a witness mark is present, primer application for all direct glazed glass is assured and no further action is required. If the witness mark is not present, the front windshield will be removed from the vehicle. The vehicle body windshield aperture and the windshield glass will be solvent cleaned. The vehicle body windshield aperture and windshield glass will be primed with the appropriate primer/activators. A continuous bead of sealant will be applied to the windshield and the windshield re-fixed to the vehicle. The vehicle will be left to allow the sealant to fully cure prior to being returned to the customer. This process is the existing service repair procedure.
- There will be no charge to owners for this inspection and possible repair.

Attached is the detailed information required by the applicable portions of 49 CFR Part 573 - Defect and Non-Compliance Information Report.

Please contact John Kobylarz at 201-818-8034 or at jkobyla1@jaguarlandrover.com for further information

Sincerely,

A handwritten signature in black ink, appearing to read "John M. Kobylarz". The signature is written in a cursive, flowing style.

pp Gary Temple
President
Land Rover Land Rover North America, LLC

Attachment

49 CFR Part 573 - DEFECT INFORMATION REPORT
RECALL P018 – 2009 Model Year Land Rover Range Rover vehicles

573.6 (c) (1) - Manufacturer Identification

Manufacturer Corporate Name

Land Rover,
Banbury Road,
Gaydon,
CV35 0RR,
United Kingdom,

Affiliated U.S. Importing Company

Jaguar Land Rover North America, LLC
555 MacArthur Boulevard
Mahwah, New Jersey, 07430

573.6 (c) (2) - Potentially Affected Vehicles

2009 Model Year Land Rover Range Rover vehicles built at the Solihull (UK) Assembly Plant from April 17, 2009 through to May 12, 2009 within VIN range SALMF15499A305420 to SALMF13419A306550 are potentially affected.

573.6 (c) (3) - Estimated Population of Vehicles Potentially Affected

Approximately 40 Range Rover vehicles in the United States and Federalized Territories.

573.6 (c) (4) - Estimated Percentage of Affected Vehicles with the Condition

Unknown.

573.6 (c) (5) - Description of the Defect

A potential concern has been identified with the installation of the front windshield. During the installation process it was identified that primer, applied by an automated glazing robot, was not being dispensed onto the glass. This omission can lead to the chemical bonding between the primer and the Polyurethane (PU) adhesive not being activated and therefore the windshield not chemically bonded to the vehicle. Where the windshield is not chemically bonded, water ingress might occur and there may be reports of increased wind noise. In extreme cases, full windshield retention may not be achieved in the event of an air-bag deployment or during a vehicle crash which increases the risk of injury in the event of a crash.

573.6 (c) (6) - Chronology of Events

On May19, 2009, Land Rover's Critical Concerns Review Group (CCRG) reviewed a stop shipment concern on Glass Bonding Primer application from the Solihull manufacturing plant. A CCRG investigation was raised and the concern was reviewed on June 02, 2009 where the full affects of the concern were discussed.

Engineering investigations were undertaken and reviewed at the CCRG on June 16, 2009. The chemical re-action of the primer and the Polyurethane (PU) adhesive were identified as the main concern and more research was undertaken. No further action is required for any other direct glazed panels as the bonding achieved is sufficient to provide the required level of structural integrity and glass retention.

At the CCRG on June 23, 2009 the issue was again discussed in-depth and a recommendation was made to progress to the Land Rover Technical Review Group (TRG). The investigation was reviewed at the Land Rover TRG on June 24, 2009 where the full failure mode and the scope of vehicle population were evaluated.

This item was presented at the Land Rover Field Review Committee on June 24, 2009 where a safety defect was determined and a Voluntary Safety Recall recommended.

Land Rover is not aware of any reports of accidents or injuries attributed to this condition.

573.6 (c) (8) (i) Manufacturer's Remedy Program and Reimbursement Plan

Owners will be notified and instructed to take their vehicles to a Land Rover dealer to have the rear tailgate glass inspected for the presence of primer. If a witness mark is present, primer application for all direct glazed glass is assured and no further action is required. If the witness mark is not present, the front windshield will be removed from the vehicle. The vehicle body windshield aperture and the windshield glass will be solvent cleaned. The vehicle body windshield aperture and windshield glass will be primed with the appropriate primer/activators. A continuous bead of sealant will be applied to the windshield and the windshield re-fixed to the vehicle. The vehicle will be left to allow the sealant to fully cure prior to being returned to the customer. This process is the existing service repair procedure.

There will be no charge to owners for this inspection and possible repair.

573.6 (c) (8) (ii) Estimated Notification Date to Owners and Dealers

Mailing of owner notification letters will occur during the week of July 20, 2009. Notification to dealers will occur on July 7, 2009.

573.6 (c) (10) -- Notices, Bulletins, and Other Communications Related to the Defect

Land Rover does not plan to make a public statement concerning the subject matter of this action. A copy of the notification letters to dealers and owners from Land Rover will be forwarded when available.

573.6 (c) (11) -- Recall Number

Land Rover has assigned recall number P018 to this recall action.