



November 9, 2010

Mr. Claude Harris
Acting Associate Administrator for Enforcement
National Highway Traffic Safety Administration
1200 New Jersey Ave., S.E.
Washington, DC 20590

**RE: Recall Campaign
Brake Vacuum Pump
2003-10 Rolls-Royce Phantom, Coupe, Drophead Coupe
Supplemental Report**

Dear Mr. Harris:

This notice is sent to you in accordance with the requirements of the National Traffic and Motor Vehicle Safety Act of 1966 and 49 CFR Part 573.

Please note that this is to supplement our September 30, 2010 report which, in accordance with Section 573.6(b), contained information pertaining to Section 573.6(c)(1), (c)(2), and (c)(5), and in addition c(3) and c(6).

1. Manufacturer: Rolls-Royce Motor Cars, Ltd.

Designated Agent: Jan Urbahn
BMW of North America, LLC
Woodcliff Lake, NJ 07677

2. Make: Rolls-Royce

<u>Model Year / Model</u>	<u>Inclusive dates of manufacture</u>
2003-2010 / Phantom	Apr 9, 2003 – Nov 30, 2009
2007-2010 / Phantom Drophead Coupe	Jul 30, 2007 – Nov 30, 2009
2008-2010 / Phantom Coupe	Jul 31, 2008 – Nov 30, 2009

3. The number of vehicles affected is approximately 2,552 as follows:

Phantom – 1,981
Phantom Drophead Coupe - 440
Phantom Coupe - 131

4. The percentage of vehicles estimated to actually contain the problem is less than 1%.

5. The issue involves the power assist braking function of the affected vehicles. Specifically, the brake vacuum pump and the brake booster are connected by a vacuum hose. In rare circumstances, a check valve of the brake vacuum pump may leak a small amount of lubricating oil into the vacuum hose. Over time, this could result in contamination of the brake booster. If this occurred, then power assist braking could be affected. In an extreme case, loss of power assist braking could occur. However, the service brake control would

Rolls-Royce Motor Cars

Rolls-Royce Motor Cars NA, LLC
Mailing Address: P.O. Box 1227, Westwood, NJ 07675-1227
Office Address: 300 Chestnut Ridge Road, Woodcliff Lake, NJ 07677-7731
Telephone (201) 307-4000 Fax (201) 571-5479
www.rolls-roycemotorcars.com
A BMW Group Company

still be available to slow and stop the vehicle and the vehicle still satisfies the applicable FMVSS pertaining to conditions in which there is a loss of power assisted braking.

6. Rolls-Royce has not received any reports, nor is Rolls-Royce otherwise aware, of any accidents or injuries related to this issue.

The name, business address, telephone number, and contact person of the brake vacuum pump is:

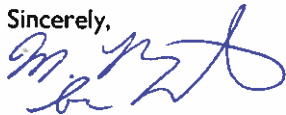
Peter Klomann
Director Quality Management
Ixetic GmbH
Georg-Schaeffler-Straße 3
61352 Bad Homburg v.d.H.
Germany
Tel. +49-6172-122-370

6. Rolls-Royce decided to perform a service action in Japan in late 2009. Subsequent to discussions with the Japanese Ministry of Land and Infrastructure Transport (MLIT), the service action was conducted in the form of a recall. Accordingly, Rolls-Royce reported this to NHTSA via Part 579 in December 2009. Concurrently, Rolls-Royce was examining the possibility of a similar issue in other markets including the US, and what type of action to take, if warranted. Extensive analyses involving, e.g., various levels of oil contamination, lab (system/component) testing, road (vehicle) testing, time-to-failure projections, Weibull (statistical) analyses, etc. were performed. This eventually resulted in a determination of the source of the problem, as well as, the number and production range of potentially affected vehicles. In mid-September 2010, Rolls-Royce decided to conduct a voluntary recall. Accordingly, Rolls-Royce submitted its initial report to NHTSA on September 30, 2010.

Rolls-Royce has not received any reports, nor is Rolls-Royce otherwise aware, of any accidents or injuries related to this issue.

7. Not applicable.
8. Rolls-Royce will conduct a recall campaign to remedy the affected vehicles. Specifically, the brake vacuum line (including a check valve) will be inspected and replaced on all vehicles eliminating the possibility for oil to reach the brake booster. If necessary, the brake booster and brake master cylinder will also be replaced. Rolls-Royce initially notified dealers in October and expects to begin and complete owner notification in late November 2010.
9. Not applicable.
10. A copy of the Service Bulletin will be submitted when available.
11. A draft copy of the owner notification letter is attached.
12. Not applicable.

Sincerely,



Jan Urbahn
General Manager
Safety Engineering and Intelligent Transportation Systems