

BMW Group

March 25, 2011

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 – 10V-518
In-Tank Fuel Pump
2008 BMW X5 SAV
Amendment**

Dear Mr. Harris:

This is an amendment to our December 8, 2010 Part 573 Supplemental Report.

Sections 4 and 6 of the report are amended as follows:

4. The percentage of vehicles estimated to actually contain the condition is between 1% and 2%.

6. BMW became aware of this matter through its normal quality control analyses and processes. Engineering analyses indicated that variations in production quality of the pump's commutator could lead to insufficient wear resistance of the commutator's brush contacts. As a result, premature wear of the commutator could occur.

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

Specifically, BMW became aware of this issue through field monitoring involving possible occurrences of stalling and non-starting engines due to warranty claims.

Warranty claims involving possible stalling or a non-starting engine were received, and by July 2009, approximately 90 claims of possible stalling and 310 claims of a non-starting engine were processed. On July 9, 2009, it was decided to continue to monitor the situation in the field. For the remainder of 2009, additional warranty claims were received.

By February 2010, approximately 170 warranty claims of possible stalling and 390 claims of a non-starting engine were received. No critical driving situations occurred in the field, as the condition of possible stalling would be preceded by a stuttering engine. On February 18, 2010, continued field monitoring was decided.

By April 2010, warranty claims continued to be received. Statistical analyses were performed which indicated that an approximate 7% overall warranty rate could occur for vehicles that would reach 120,000 miles. On April 1, 2010, Engineering was instructed to demonstrate, by appropriate testing, the nature in which the condition would present itself to a driver if it occurred.

Company
BMW of North America, LLC

BMW Group Company

Mailing address
PO 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

Website
bmwusa.com

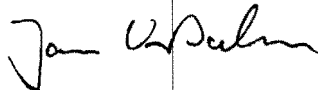


By June 2010, approximately 250 warranty claims of possible stalling, and 740 claims of a non-starting engine were received. Initial analyses by Engineering suggested that if the condition occurred in the field, it was more likely to be announced to the driver at high fuel-feed rates (highway driving) than in low fuel-feed rates (city driving) presumably. On June 10, 2010, Engineering was instructed to perform more detailed analyses.

Further analyses by Engineering indicated that during driving with higher engine loads, a malfunction of the fuel pump would result in a reduction of engine power and engine stuttering. Engineering also indicated that if a fuel pump malfunction occurred during driving with medium or low engine loads, engine operation would only be possible for a very short period of time.

On October 21, 2010, BMW decided to conduct a voluntary recall. Accordingly, on October 26, 2010, BMW notified NHTSA by submission of a Part 573 report.

Sincerely,

A handwritten signature in black ink, appearing to read "Jan Urbahn". The signature is fluid and cursive, with the first name "Jan" being more prominent.

Jan Urbahn
General Manager
Safety Engineering and Intelligent Transportation Systems