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August 17, 2010

By E-mail and Overnight Delivery

Ms. Jennifer Timian
Acting Chief
Recall Management Division
National Highway Traffic Safety Administration
400 Seventh Street, S.W.
Washington, D.C. 20590
202-366-0699, Fax 202-366-7882

Dear Ms. Timian:

This report is submitted by Garmin International, Inc., pursuant to 49 CFR Part 573, to advise NHTSA that the Garmin group of companies ("Garmin") will be voluntarily recalling a subset of numerous nüvi® branded portable automotive GPS products that contain lithium-ion batteries manufactured by a third-party supplier within a defined date code range and a particular printed circuit board (PCB) design.

1. Full corporate name of the fabricating manufacturer of the recalled item of equipment.

Garmin Corporation*
No. 68, Jangshu 2nd Road
Shijr, Taipei County
Taiwan, R.O.C.

* The Garmin entity that manufactured the GPS products at issue.

Garmin International, Inc.*
1200 E. 151st Street
Olathe, KS 66061

* The Garmin entity that designed and developed the products at issue and through which the products were sold in the United States.

The lithium-ion battery packs were manufactured and assembled by a non-Garmin entity.

2. Identity of the items of equipment involved in the recall.

Only a small subset of the following nüvi® model numbers are potentially implicated by this recall:

- nüvi 2x0W (where x is a 0, 5 or 6)

- nüvi 7xx (where xx is a two-digit number)

See the attached Appendix 1 for a complete list of potentially-affected nüvi models by number and, where applicable, name (some models are sold to OEM and rental car customers as OEM accessories).

3. Number of units being recalled.

Approximately 1.25 million units. This constitutes the Garmin automotive GPS models referenced above -- in the field or in distribution channels -- containing batteries from a third-party supplier manufactured during a 22-week date code range from approximately October 15, 2007 through March 28, 2008.

4. Approximate percentage of the total number of items of equipment estimated to actually contain the defect or noncompliance and determination of the recall range.

The percentage of reported failures is extremely low. We have identified 8¹ unexplained reported field failures involving overheating out of the approximate 1.25 million Garmin models referenced above manufactured with batteries from the date range specified in paragraph number 3 above and which have the specific PCB design. This equates to a failure percentage of 6.67 parts per million.

5. Description of potential defect.

Garmin has identified potential overheating issues when the third-party supplier's batteries manufactured within this limited date code range are used in certain Garmin devices with a specific printed circuit board (PCB) design. It appears that the interaction of these factors can, in rare circumstances, increase the possibility of overheating, which may lead to a fire hazard. The batteries are installed partially under the PCB inside the GPS products and are not user-replaceable by consumers.

None of the reported incidents has caused significant property damage and no injuries have occurred. Nevertheless, given Garmin's longstanding commitment to safety and customer satisfaction, Garmin is proactively recalling the nüvi units with the specific PCB design and with batteries from the specified date code range out of an abundance of caution.

No failures have been reported with any devices with this specific PCB design containing batteries manufactured outside of the date code range of interest.

¹ A total of 9 failures were reported but one failure was attributed to abuse by the independent investigative lab due to clear signs of external mechanical abuse in the location of the battery.

6. Chronology.

The 8 incidents reported to Garmin occurred between July 8, 2009 and July 12, 2010. Upon receiving each report, Garmin worked to identify and understand the root cause of each incident. Garmin enlisted the assistance of a third party laboratory as well as the battery manufacturer. With the occurrence of the four most recent incidents between May 15, 2010 and July 12, 2010, and based on the clustering of the incidents within a specific date range of batteries where those range of batteries are combined with a certain Garmin PCB design, Garmin concluded on August 10, 2010 that the affected Garmin models with the specific PCB design using batteries within this date range should be recalled out of an abundance of caution.

7. Description of the remedy and distinguishing characteristics of new parts.

Garmin customers in possession of affected GPS units will be instructed to return the affected nüvi to a Garmin authorized service center for service. The unit's battery will be replaced with a new battery and Garmin is evaluating the insertion of a spacer on top of the battery next to the PCB. It is currently believed that the insertion of the spacer will help minimize any interference between the PCB and the battery. Once the battery is replaced and the service concluded, the nüvi will be immediately returned to the customer. Garmin will pay for all associated service and shipping charges (the battery supplier will share in those costs).

Garmin has set up a dedicated website for customers and dealers to visit to determine if their unit is implicated by this recall (by simply typing in their unit's serial number).

Garmin will also use the recall communication materials as an opportunity to re-emphasize the instructions and warnings contained in Garmin's existing product literature warning customers not to expose the products to high temperatures by leaving their units in vehicles while unattended because of the extremely high temperatures that can be reached on a car dashboard on a hot, sunny day. These high temperatures can cause the battery to swell, which may have contributed to the reported incidents.

8. Recall communications.

Garmin plans to make the following core recall announcements/communications in the U.S. as soon as our plans are approved by the Administration (Garmin will also be coordinating with regulatory authorities in other affected countries, as appropriate):

- issue press release;
- post a Service Alert Recall information document to a prominent location on Garmin's website;
- send an e-mail to the individual customers with affected units whom we can identify by serial number information contained in our registration records;
- send appropriate notification communications to Garmin's retailer/distributor customers and automotive OEM customers.

Drafts of these communication documents can be immediately provided to the Administration under separate cover. If you care to identify the NHTSA staff member to whom this recall will

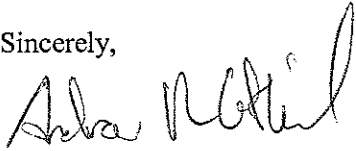
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be assigned, we will be happy to proactively contact the staff member to discuss our communication documents.

Please call me at 913-440-1212 if you have any questions about this Report. We would appreciate the Administration's urgent attention to this matter. Garmin is currently concluding all recall implementation plans and would like to launch the recall publicly as soon as possible.

Thank you for your assistance and cooperation.

Sincerely,

A handwritten signature in black ink, appearing to read "Andrew R. Etkind". The signature is fluid and cursive, with a large initial "A" and "R".

Andrew R. Etkind
Vice President & General Counsel

APPENDIX 1

nüvi 200W
nüvi 250W
nüvi 260W
nüvi 710
nüvi 715
nüvi 750
nüvi 755
nüvi 755T
nüvi 760
nüvi 765
nüvi 765T
nüvi 770
nüvi 775
nüvi 775T
nüvi 780
nüvi 785T

Avis nüvi 760
Avis/Budget nüvi 780
Europcar nüvi 760
Hertz nüvi 765
Honda nüvi 760
Landrover nüvi 750
Mazda nüvi 760
Mercedes nüvi 760
Mopar nüvi 250
Nissan nüvi 750
Nissan nüvi 760
Smart nüvi 760
Suzuki nüvi 750
Suzuki nüvi 760
Suzuki nüvi 765

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Volkswagon nüvi 765

Volkswagon nüvi 765T

Volvo nüvi 760

Volvo nüvi 765