



U.S. Department
of Transportation
**National Highway
Traffic Safety
Administration**

1200 New Jersey Avenue SE
Washington, DC 20590

May 27, 2011

MR. JAN URBAHN
GENERAL MANAGER, SAFETY ENGINEERING
AND INTELLIGENT TRANSPORTATION SYSTEMS
BMW OF NORTH AMERICA, LLC
PO BOX 1227
WESTWOOD, NJ 07675-1227

NVS-215dgl
11V-299

Subject: CONTROLS AND DISPLAYS/FMVSS 101/PETITION

Dear MR. URBAHN:

This letter serves to acknowledge BMW of North America, LLC's notification to the National Highway Traffic Safety Administration (NHTSA) of a safety noncompliance with Federal Motor Vehicle Safety Standard No. 101, "Controls and Displays," in the products described below for which a safety recall campaign shall be conducted pursuant to Federal law.

Please review the following information to ensure that it conforms to your records as this information is being made available to the public. If the information does not agree with your records, please contact us immediately to discuss your concerns.

Makes/Models/Model Years:
MINI/COOPER CLUBMAN/2011
MINI/COOPER S CLUBMAN/2011

Mfg's Report Date: May 25, 2011

NHTSA Campaign Number: 11V-299

Components: ELECTRICAL SYSTEM: INSTRUMENT PANEL

Potential Number of Units Affected: 75

Summary:

CERTAIN MODEL YEAR 2011 MINI COOPER CLUBMAN AND COOPER S CLUBMAN VEHICLES MANUFACTURED FROM FEBRUARY 8, 2011, THROUGH MAY 11, 2011, FAIL TO COMPLY WITH THE REQUIREMENTS OF FEDERAL MOTOR VEHICLES SAFETY STANDARD NO. 101, "CONTROLS AND DISPLAYS." THESE VEHICLES ARE EQUIPPED WITH A EUROPEAN SPECIFICATION TACHOMETER THAT USES BRAKE-SYSTEM TELLTALES/SYMBOLS THAT DO NOT MEET U.S. REQUIREMENTS.

Consequence:

SEE NOTES:

Remedy:

SEE NOTES:

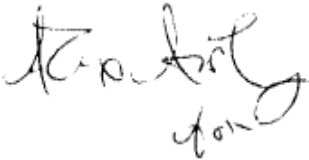
Notes:

THE MANUFACTURER IS PETITIONING NHTSA FOR A DETERMINATION THAT THIS MATTER IS INCONSEQUENTIAL TO MOTOR VEHICLE SAFETY. THE MANUFACTURER IS NOT OBLIGATED TO CONDUCT AN OWNER NOTIFICATION AND REMEDY CAMPAIGN UNTIL NHTSA HAS RESOLVED THIS PETITION. IF THE PETITION IS DENIED, THE MANUFACTURER WILL BE NOTIFIED AND MUST THEN UNDERTAKE ITS NOTIFICATION AND REMEDY CAMPAIGN OBLIGATIONS.

Under 49 U.S.C. § 30112(a), it is illegal for anyone, including a manufacturer, distributor, dealer, or retailer to sell an item of equipment or vehicle that fails to comply with all applicable Federal motor vehicle safety standards.

Your contact for this recall will be Delia Lopez who may be reached by phone at 1-202-366-9525, or by email at Delia.Lopez@dot.gov, or through the office email at RMD.ODI@dot.gov. We look forward to working with you toward a successful completion of this recall campaign.

Sincerely,



Jennifer Timian
Chief, Recall Management Division
Office of Defects Investigation
Enforcement