

BMW Group

August 30, 2012

Ms. Nancy Lummen Lewis
Associate Administrator for Enforcement
National Highway Traffic Safety Administration
1200 New Jersey Avenue, S.E.
Washington, D.C. 20590

Re: 11V-299
Withdrawal of Petition for Inconsequential Non-Compliance
2011 MINI Cooper Clubman, Cooper S Clubman
Instrument Cluster (Tachometer)

Dear Ms. Lewis:

On May 25, 2011, BMW of North America, LLC ("BMW NA") filed a 49 CFR Part 573 Notice involving 75 Model Year 2011 MINI vehicles, where the instrument cluster (specifically, the tachometer) mounted behind the steering wheel was European specification instead of US specification. The ECE specified version contains telltale lights with non-US symbols. In the event of a brake system warning or malfunction, a symbol instead of the required word "brake" is illuminated. In the event of an Anti-Lock Brake (ABS) System warning, an ABS symbol (the letters "ABS" within a circle/brackets) is illuminated instead of only the letters "ABS". In its Notice, BMW NA stated it believed the issue was inconsequential to safety and would be filing a Petition for Inconsequential Non-Compliance in accordance with the provisions of 49 CFR 556.

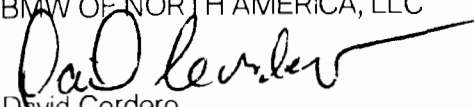
On June 3, 2011, BMW NA timely filed its Petition for Inconsequential Non-Compliance. The Petition was published in the Federal Register on August 18, 2011. We understand no comments to the Petition were received.

On August 30, 2012, BMW NA became aware that the tachometer on all affected (75) vehicles had been replaced during servicing at a dealer. Therefore, 100% of the affected vehicles have received a new instrument cluster (tachometer) containing the appropriate US required symbols.

Since the Petition has not been denied nor granted as of yet, and since 100% of the affected vehicles have been remedied, BMW NA would like to withdraw its Petition for Inconsequential Non-Compliance.

Please let me know if you have any questions.

Sincerely,
BMW OF NORTH AMERICA, LLC


David Cordero
Safety Integrity and Recall Manager

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BMW of North America, LLC

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