



VIA FEDERAL EXPRESS

February 15, 2012

Mr. Daniel Smith
Associate Administrator for Enforcement
National Highway Traffic Safety Administration
Attention: Recall Management Division (NVS-215)
1200 New Jersey Avenue, S.E.
Washington, D.C. 20590

Subject: Notification of Recall

2011 – 2012 Cayenne 2011 – 2012 Cayenne S

2011 – 2012 Cayenne S Hybrid 2011 – 2012 Cayenne Turbo

Modifying Headlamp Locking Mechanism

Porsche Cars North America, Inc.

980 Hammond Drive Suite 1000 Atlanta, Georgia 30328

(770) 290-3500 Fax: (770) 290-3700

Dear Mr. Smith:

Porsche Cars North America, Inc. ("Porsche") on behalf of Dr. Ing. h.c.F. Porsche AG, hereby informs you of Porsche's intention to conduct a safety related recall and remedy campaign involving certain 2011 and 2012 Porsche vehicles. This information is submitted in accordance with the provisions of Part 573 of Title 49 of the code of Federal Regulations.

573.6 (c) (1) Manufacturer's Name

Dr. Ing. h.c.F. Porsche AG

70435 Stuttgart

Germany

Importer / Agent

General Counsel and Secretary Porsche Cars North America, Inc.

980 Hammond Drive

Suite 1000

Atlanta, GA 30328

573.6 (c) (2) <u>Identification of Vehicles</u>

Make: Porsche

Model Years: 2011 - 2012

Mr. Daniel Smith Notification of Recall February 15, 2012 Page 2 of 4

Models: Cayenne

Cayenne S

Cayenne S Hybrid Cayenne Turbo

Production

Dates: March 8, 2010, to January 31, 2012

VIN Ranges:

Vehicle Type: Multi-purpose vehicle

Bodystyle: 4-door sport utility vehicle

Component

Supplier: To be determined.

573.6 (c) (3) Number of Vehicles Potentially Containing the Defect

20,278

573.6 (c) (4) Percentage of Vehicles Actually Containing Defect

100%

573.6 (c) (5) Description of Defect

The headlamps of the subject Porsche Cayenne models are designed as slide-in modules, which are secured in the fender via a twist lock. This design principle allows customers and technicians to service the headlamp assembly easily, as is legally required in various jurisdictions. With this system the headlight assembly can be released (unlocked) using a socket wrench and can then be pulled forward out of the fender. Customers can find the relevant instructions in the owner's manual.

If a headlamp module is not locked correctly, relative movements with the mating fender that occur normally while driving can cause the headlamp assembly to detach from the fender.

Mr. Daniel Smith Notification of Recall February 15, 2012 Page 3 of 4

573.6 (c) (6)

Basis for Determination

October 2010

The first isolated cases for symptoms of "loose headlight" or "headlight becoming detached" were noticed for the affected models during the course of normal field observation.

October 2010 - May 2011

Internal tests and inspections were conducted by Porsche AG. The results of the more in-depth field observations and analyses indicated the reported cases were not random. "Incorrect handling when locking the headlight" during production, at dealers or in the field were determined to be the most likely cause of the problem.

Initial steps were taken to ensure that the headlamp assemblies were secured correctly at the end of the production process by conducting an additional 100% inspection as well as making the headlamp assembly lock more robust.

May 2011 - August 2011

In June the eleventh case was reported in the United States since the start of production of the affected models. Due to the continued occurrence of the problem in the U.S. and other countries, Porsche AG sought to further determine the cause of the problem by conducting on-site inspections on several "suspect" customer vehicles in various European countries as well as intensive additional testing, e.g. shake test per FMVSS 108, resonance tests, misuse tests, endurance testing on poor road surfaces, etc.

September 2011 - January 2012

In September the development of a standard production solution for a more robust method of securing the headlamp assembly was initiated.

Testing results of the solution developed, completed by the development department in December, confirmed the solution: if the headlamp assembly is not locked correctly, an additional retaining spring in the locking assembly acts as a fail-safe.

Date of production introduction: January 2012.

January 2012 - February 2012

Porsche AG decided to conduct a safety recall and retrofit the standard production solution for all affected vehicles that have already been delivered to customers. There have now been 20 reported cases in the United States. Porsche is not aware of any events involving crashes or injury as a result of loose headlamps or headlights that have become detached.

Date of determination: February 8, 2012.

Mr. Daniel Smith Notification of Recall February 15, 2012 Page 4 of 4

573.6 (c) (7) Noncompliance Test Result

Not applicable.

573.6 (c) (8) Proposed Remedial Program

The affected vehicles will be recalled to the workshop and the headlamp assembly locking components (locking plate, retaining spring and locking element) for each

headlamp assembly will be replaced.

573.6 (c) (9) Remedy Proposal for the Replacement of Tires

Not applicable.

573.6 (c) (10) Recall Communications

Attached is a draft copy of the pertinent Technical Information Bulletin to be

distributed to the Porsche dealer network. A draft of the customer notification letter

is also enclosed.

573.6 (c) (10) Manufacturer Campaign Number

AC01.

Porsche is currently planning to notify customers via first class mail beginning on February 23, 2012.

Should you have any questions or require further information, please do not hesitate to contact me at (770) 290-3627.

Sincerely,

Walter J. Lewis, Manager

Regulatory Affairs

Enclosures

cc: George Person, NHTSA - ODI via facsimile