



VIA CERTIFIED MAIL RRR, AND EMAIL

July 30, 2012

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

**RE: Amendment
Non-Compliance Recall Campaign
Tire Information Label
2012 Rolls-Royce Ghost**

Dear Ms. Lewis:

This is an amendment to our July 25, 2012 report, and is being sent to you in accordance with the requirements of the National Traffic and Motor Vehicle Safety Act of 1966 and 49 CFR Part 573.

Pursuant to Section 573.6(c), we are amending our July 25, 2012 report. Section 3 and Section 8 of our July 25th report have been replaced by the new Section 3 and Section 8 below in **bold**.

- 1. Manufacturer: Rolls-Royce Motor Cars, Ltd.
Designated Agent: Thomas C. Baloga
Vice President, Engineering-US
BMW of North America, LLC
200 Chestnut Ridge Rd. (Bldg. 150)
Woodcliff Lake, New Jersey 07677
- 2. Make: Rolls-Royce

<u>Model Year / Model</u>	<u>Inclusive dates of manufacture</u>
2012 / Ghost	March 27, 2012 – July 13, 2012
- 3. **The number of vehicles affected is 10; 8 vehicles at authorized Rolls-Royce dealerships and 2 vehicles owned by customers.**
- 4. The percentage of vehicles estimated to actually contain the condition is 100%.
- 5. The non-compliance involves the vehicle's tire information label. Affected vehicles were equipped with 20-inch tires, but the label states that the vehicles were equipped with 19-inch tires. Therefore, the label does not conform to FMVSS 110.
- 6. Not applicable.
- 7. On July 13, 2012, Rolls-Royce became aware of this matter during vehicle inspections at the assembly plant. It was noticed that the tire information label did not match the tires equipped

Rolls-Royce Motor Cars

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A BMW Group Company

on potentially affected vehicles. On July 13th, potentially affected vehicles were held at the assembly plant for further review.

On July 16th, BMW AG Vehicle Homologation and Type Approval Group became involved by reviewing the regulatory requirements and the available label information, and also coordinating with other groups. BMW AG Tire Performance Engineering performed a review of the engineering release database. The BMW AG Product Quality Group was also informed.

On July 18, 2012, it was determined that due to an information systems error in the plant, labels containing information for 19-inch tires were allocated to vehicles equipped with 20-inch tires. Vehicle production and manufacturing records were reviewed in order to determine the number and production range of potentially affected vehicles.

On July 18, 2012, Rolls-Royce determined that affected vehicles do not conform to FMVSS 110, and decided to conduct a voluntary recall.

Rolls-Royce is not aware of any accidents or injuries related to this issue.

8. **Rolls-Royce believes this matter is inconsequential to motor vehicle safety, and will be filing a Petition for Inconsequential Noncompliance in accordance with the provisions of Part 556. BMW believes this matter is inconsequential to safety since there are only two customer vehicles involved and the difference in tire pressure between the 20-inch tires and 19-inch tires is 3psi. Moreover, 100% of the labels were immediately replaced concurrent to notifying the NHTSA, which completely removed any potential for safety relevance. Further details will be provided in the Petition.**
9. Not applicable.
10. A copy of the information provided to dealers is attached.
11. Not applicable.

Sincerely,



David Cordero
Safety Integrity and Recall Manager