



October 03, 2012

Nancy Lewis  
Associate Administrator for Enforcement  
National Highway Traffic Safety Administration  
Attention: Recall Management Division (NVS-215)  
1200 New Jersey Ave SE,  
Washington DC, 20590

Dear Ms. Lewis:

**Subject: Land Rover Recall Number P028 – Certain 2012 Model Year Land Rover Range Rover vehicles for replacement of the Windshield**

Pursuant to 49 CFR 573, Defect and Noncompliance Responsibility and Reports, Jaguar Land Rover North America, LLC is submitting information concerning a recall that is being voluntarily initiated.

Summary

- Action – Land Rover is conducting a voluntary safety recall involving certain 2012 Model Year Land Rover Range Rover vehicles built at the Solihull (UK) Assembly Plant on November 24, 2011 to correctly bond the windshield to the screen aperture. Vehicles will have the windshield removed and replaced with the correct bonding agent in line with existing service repair procedures. This action is necessary to conform to the requirements of Federal Motor Vehicle Safety Standard 212 - Windshield Mounting.
- Number of Vehicles Involved – 36 2012 MY Land Rover Range Rover vehicles in the United States and Federalized Territories.
- Affect on Vehicle Operation – Where the windshield is not correctly bonded, water ingress might occur and there may be reports of increased wind noise. In extreme cases where there is insufficient chemical bond between the windshield glass and the PU adhesive, full windshield retention may not be achieved in the event of an air bag deployment or during a vehicle crash increasing risk of occupant injury.

- Service Program – Dealers will replace the windshield using existing service procedures and materials.

There will be no charge to owners for this repair.

Attached is the detailed information required by the applicable portions of 49 CFR Part 573 - Defect and Non-Compliance Information Report.

Please contact me for further information.

Sincerely,

A handwritten signature in black ink, appearing to read "James C. Patterson", with a stylized flourish at the end.

James C. Patterson  
Automotive Safety Office  
Jaguar Land Rover North America, LLC

Attachment

49 CFR Part 573 - DEFECT INFORMATION REPORT  
RECALL P028 – CERTAIN 2012 MODEL YEAR LAND ROVER RANGE ROVER VEHICLES

573.6 (c) (1) - Manufacturer Identification

Manufacturer Corporate Name

Land Rover  
Banbury Road,  
Gaydon,  
Warwickshire,  
CV35 0RR  
England

Affiliated U.S. Importing Company

Jaguar Land Rover North America, LLC  
555 MacArthur Boulevard  
Mahwah, New Jersey, 07430

573.6 (c) (2) - Potentially Affected Vehicles

Certain 2012 Model Year Land Rover Range Rover vehicles built at the Solihull (UK) Assembly Plant on November 24, 2011 within VIN range SALMF1D42CA [REDACTED] to SALMF1E42CA [REDACTED] are potentially affected.

573.6(c) (2) (iv) – Part Numbers, Components affected and Components Final Country of Manufacture

This condition relates to a Land Rover manufacturing concern where the incorrect windshield bonding agent Bostik Windscreen Sealer (Bostik Product Code 01840-21) instead of PU bonding agent was incorrectly supplied for assembly line side and untrained labor was deployed during the night shift of November 24, 2011 where the work element sheet instructions for this containment were not correctly followed. This is a result of a manufacturing error state and not a component concern.

The UK is the final country of manufacture.

573.6 (c) (3) - Estimated Population of Vehicles Potentially Affected

36 2012 MY Land Rover Range Rover vehicles in the United States and Federalized Territories.

573.6 (c) (4) - Estimated Percentage of Affected Vehicles with the Condition

100%

573.6 (c) (5) - Description of the Defect

A quality containment action required an application of Polyurethane Adhesive (PU) to be applied to the body shell windshield bonding flange to address water leaks and wind noise from the front windshield area. Bostik Windscreen Sealer (Bostik Product Code 01840-21) instead of PU bonding agent was incorrectly supplied for assembly line side use. Untrained labor was deployed during the night shift of 24 November 2011 where the work element sheet instructions for this containment were not correctly followed. As a result the windshield aperture had an application of the Bostik Windscreen Sealer across the complete upper aperture which prevented the correct adhesion of the Polyurethane (PU) to the design condition.

573.6 (c) (6) - Chronology of Events

The first indication of this condition was received via Land Rover's Electronic Product Quality Report (EPQR) raised on June 19, 2012 during an investigation into a wind noise issue on an internal fleet vehicle VIN SALMF1E48CA [REDACTED] in the United States.

A Land Rover Critical Concern Review Group (CCRG) investigation was opened on July 9, 2012 to carry out an investigation into the concern. Land Rover engineering reviewed build records and manufacturing actions around the time the subject vehicle VIN SALMF1E48CA [REDACTED] was manufactured.

Review of Land Rover's manufacturing records during July 2012 identified that in November, 2011, Land Rover's manufacturing facility at Solihull (UK) initiated a containment action in the windshield area. The findings of this review of manufacturing records were presented to the CCRG on July 16, 2012.

Further review at the CCRG on July 23, 2012 identified that on November 24, 2011 when the subject vehicle was having the windshield installed as part of serial production operations, a new operative was deployed on this work station during the night shift. As a result of the new operative not correctly complying with the work instruction sheet, the windshield aperture had an incorrect application of additional Bostik Windshield Sealer in an incorrect position across the complete upper area of the body shell windshield aperture flange.

Land Rover's Body Engineering team presented to the CCRG on July 23, 2012 a complete Computer-aided engineering (CAE) analysis to fully understand the failure mode. Through early August 2012 CCRG further reviewed the CAE analysis and established that where the correct process was not followed on the nightshift of November 24, 2011 the structural integrity of the bonding could not be assured. The CCRG concluded that the issue should be progressed to the Technical Review Group (TRG).

The investigation was reviewed by the Land Rover Technical Review Group (TRG) on August 22, 2012 where the full failure mode and the scope of vehicle population were reviewed. The TRG recommended the issue be progressed to the Field Review Committee (FRC). Prior to progression to FRC, a request was made to determine if all vehicles had received remedial repairs for associated customer satisfaction concerns such as wind noise and/or water leaks. The review concluded in early September that there was no reliable means to assure screen bonding was assured and the matter should be progressed to FRC for determination.

The FRC was convened on September 26, 2012 and concluded that the issue represented an unreasonable risk to safety due to the effect on vehicle operation that full windshield retention may not be achieved in the event of an air bag deployment or during a vehicle crash. The FRC instructed that a voluntarily safety recall be conducted.

A total population of 91 vehicles manufactured during the night shift on November 24, 2011 are affected. 36 vehicles within the affected VIN range are located in the United States.

573.6 (c) (8) (i) Manufacturer's Remedy Program and Reimbursement Plan

Owners will be notified and instructed to take their vehicles to a Land Rover authorized repairer to have the windshield replaced and correctly bonded to design intent.

There will be no charge to owners for this repair.

573.6 (c) (8) (ii) Estimated Notification Date to Owners and Dealers

Mailing of owner notification letters will occur by November 5, 2012. Notifications to dealers will occur on October 8, 2012.

573.6 (c) (10) - Notices, Bulletins, and Other Communications Related to the Defect

Land Rover does not plan to make a public statement concerning the subject matter of this action. A copy of the notification letters to dealers and owners from Land Rover will be forwarded when available.

573.6 (c) (11) - Recall Number

Land Rover has assigned recall number P028 to this recall action.