



August 2, 2013

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

Subject: Jaguar Recall Number J030 – Certain 2011 to 2014 Model Year Jaguar XK Convertible vehicles for non-compliance with certain Power Operated Window operation associated with 49 CFR Part 571 FMVSS118 Power Operated Window, Partition and Roof Panel Systems

Dear Ms. Lewis:

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

Summary

- Action – Jaguar Land Rover is conducting a voluntary non-compliance recall involving certain 2011 to 2014 Model Year (MY) Jaguar XK convertible vehicles built at the Castle Bromwich (UK) Assembly Plant to replace the overhead roof console assembly in which a the convertible roof switch (which also operates power windows) does not meet the requirements of CFR 49 Part 571 FMVSS118 Power Operated Window, Partition and Roof Panel Systems
- Number of Vehicles Involved – 1,989 2011 to 2014 MY XK convertible vehicles in the United States and Federalized Territories.

Jaguar XK Convertible SAJWA4EC9BMB42168 to SAJWA4GB6ELB52946
October 1, 2010 to August 1, 2013.

- Affect on Vehicle Operation – A concern has been identified where the overhead roof console assembly contains a switch which operates the open and close mechanism of the convertible roof. This switch does not meet the requirements found in section 6 (c) of Federal Motor Vehicle Safety Standard (FMVSS) 118. A non-compliant switch could increase the risk of inadvertent power window activation and occupant injury.
- Service Program – Jaguar dealers will replace the overhead roof console assembly with a revised design which incorporates a new convertible roof control switch that meets the requirements of FMVSS118. Unsold vehicles will have this repair completed prior to customer handover. 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 large, sweeping flourish extending to the right.

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

Attachment

49 CFR Part 573 - DEFECT INFORMATION REPORT RECALL J030 – Certain 2011 to 2014 Model Year Jaguar XK Convertible vehicles for non-compliance with certain Power Operated Window operation associated with 49 CRF Part 571 FMVSS118 Power Operated Window, Partition and Roof Panel Systems

573.6 (c) (1) - Manufacturer Identification

Manufacturer Corporate Name

Jaguar Land Rover Limited
Abbey Road
Whitley
Coventry
England
CV3 4LF

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 2011 to 2014 MY Jaguar XK convertible vehicles built at the Castle Bromwich (UK) assembly plant manufactured from October 1, 2010 to August 1, 2013. Certain vehicles within the VIN range SAJWA4EC9BMB42168 to SAJWA4GB6ELB52946 are potentially affected.

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

Overhead roof console assembly part numbers: C2P25445AMN and C2P25445PVJ

Lear Corporation
10 Hedera Road
North Moons Moat
Redditch
B98 9EY

Account Manager: Mr. Steve Smith
email: ssmith12@lear.com
Tel: +44 (0)2476 700092 (Int. 7252)
Fax: +44 (0)2476 700030

The overhead roof console assembly is on Jaguar XK convertible vehicles only.

The UK is the final country of vehicle manufacture.

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

1,989 2011MY to 2014MY Jaguar XK convertible 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

Jaguar Land Rover engineers observed during the assessment of the convertible roof design review, the overhead roof console assembly switches design did not fully meet the requirements of Federal Motor Vehicle Safety Standard (FMVSS) 118 section 6(c) which states:-

'Any actuation device for closing a power-operated window must operate by pulling away from the surface in the vehicle on which the device is mounted. An actuation device for closing a power-operated window must operate only when pulled vertically up (if mounted on the top of a horizontal surface), or out (if mounted on a vertical surface), or down (if mounted on the underside of an overhead surface), or in a direction perpendicular to the surrounding surface if mounted in a sloped orientation, in order to cause the window to move in the closing direction'.

The switch incorporated in the overhead roof console assembly also activates the power operated windows when the convertible roof is opening or closing. The switch can be contacted in a manner which contravenes the operation requirements of section 6 (c) and therefore does not comply with section 6 (c) of FMVSS118.

Jaguar Land Rover has determined that vehicles in this condition do not meet the standards set in FMVSS118 section 6(c) and, therefore, is conducting a voluntary non-compliance recall. A non-compliant switch could increase the risk of inadvertent power window activation and occupant injury. Jaguar Land Rover is not aware of any reports of accidents or injuries attributed to this condition.

573.6 (c) (7) - Test Results and Other Information Used to Determine Non-compliance and Date

A Critical Concern Review Group (CCRG) investigation was raised in November, 2012, to address a potential issue with the functionality of the convertible roof operation switch identified during a vehicle review in Mahwah, NJ, by the Jaguar Land Rover North America Safety Compliance team. The CCRG reviewed the issue to determine if the design functionality of the power roof switch met the regulatory requirements of Federal Motor Vehicle Safety Standard (FMVSS118).

The CCRG investigation was progressed to the Technical Review Group (TRG) who requested the CCRG conduct further review of the technical regulation and its application to the power operated roof functionality. Following this review the TRG agreed to progress this issue to the Field Review Committee (FRC). The FRC reviewed the investigation and requested further analysis of the compliance implications of the roof switch design from the CCRG. A further review took place at

the CCRG to clarify compliance implications with the switch design and overhead console moulding.

The FRC reconvened on July 26, 2013, and concluded that a full and thorough investigation had been conducted. The FRC confirmed that Jaguar XK convertible vehicles built from October 1, 2010, onwards had a power roof switch design did not fully meet the requirements of Federal Motor Vehicle Safety Standard (FMVSS118) section S6(c). The FRC agreed to conduct a voluntary non-compliance recall action.

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

Owners will be notified and instructed to take their vehicles to a Jaguar dealer who will replace the overhead roof console assembly with a revised design which incorporates a new convertible roof control switch that meets all of the requirements of FMVSS118.

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 on or before September 27, 2013. Notifications to dealers will occur on August 07, 2013.

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

Jaguar 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 Jaguar Land Rover will be forwarded when available.

573.6 (c) (11) - Recall Number

Jaguar Land Rover has assigned recall number J030 to this recall action.