

# Part 573 Safety Recall Report

# 19V-612

**Manufacturer Name :** BMW of North America, LLC**Submission Date :** AUG 21, 2019**NHTSA Recall No. :** 19V-612**Manufacturer Recall No. :** NR**Manufacturer Information :**

Manufacturer Name : BMW of North America, LLC

Address : P.O. Box 1227

Westwood NJ 07675-1227

Company phone : 18005257417

**Population :**

Number of potentially involved : 422

Estimated percentage with defect : 100 %

**Vehicle Information :**

Vehicle 1 : 2019-2019 Rolls-Royce Cullinan

Vehicle Type : LIGHT VEHICLES

Body Style : SUV

Power Train : GAS

**Descriptive Information :** Approximately 454 vehicles may not fully conform to FMVSS 108 (Lamps, reflective devices and associated equipment) Section 7.3.13.1 and Table IX.

**Basis for recall population determination:** Supplier production information was used to identify the start and end date of the tail lamps which may have been subject to an out-of-specification production process which was then correlated with vehicle assembly information to determine the start date and the end date of potentially affected vehicles.

**Recall component difference to non-recall component:** The stop lamp photometry may not fully conform to FMVSS 108. Section 7.3.13.1 and Table IX.

Production Dates : DEC 01, 2018 - JUL 18, 2019

VIN Range 1 : Begin :

NR

End : NR

 Not sequential**Description of Noncompliance :**

**Description of the Noncompliance :** This noncompliance involves the stop lamps. Due to variations in the supplier's production process, some stop lamps may not have been produced to specifications. The stop lamps may not fully conform to FMVSS 108 Section 7.3.13.1 and Table IX, specifically for Group Number 3, Group Minimum Photometric Intensity, Lighted Section 1. Affected vehicles may be equipped with one, or both, suspect stop lamps.

**FMVSS 1 :** 108 - Lamps, reflective devices, and assoc. Equipment

FMVSS 2 : NR

Description of the Safety Risk : There is a slight probability that the perceptibility of one or both stop lamps could be impaired for road users driving behind an affected vehicle, which may increase the risk of a crash.

Description of the Cause : NR

Identification of Any Warning  
that can Occur : NR

## Supplier Identification :

### Component Manufacturer

Name : Wipac Limited

Address : 1 London Rd  
Buckingham FOREIGN STATES MK18 1BH

Country : United Kingdom

## Chronology :

In late July, testing indicated that some stop lamps may not provide the specified level of luminosity. A vehicle hold was issued to inspect potentially affected vehicles.

A review of the supplier's manufacturing process and additional testing indicated that tail lamps of other production lots may also have been affected by production variations.

In early August, an assessment of the worldwide stop lamp requirements was initiated. Preliminary information suggested that the stop lamps may not conform to certain photometry requirements of FMVSS 108.

Based on the supplier's production records, potentially affected tail lamps were identified. Vehicle manufacturing records were reviewed to identify potentially affected vehicles.

On August 14, 2019, it was determined that affected vehicles may not fully conform to FMVSS 108 Section 7.3.13.1 and Table IX. As a result, Rolls-Royce decided to conduct a voluntary recall.

Rolls-Royce has not received any reports, nor is Rolls-Royce otherwise aware, of any accidents or injuries related to this issue.

## Description of Remedy :

Description of Remedy Program : The encoding data affecting the stop lamp photometry will be updated.

Owners will be notified by First Class mail and instructed to take their vehicle to an authorized Rolls-Royce Motor Car dealer to have the remedy performed for free. If this condition were to occur to a potentially affected vehicle prior to this recall, the remedy would be covered by the Rolls-Royce New Vehicle Limited Warranty program. Therefore, reimbursement for a pre-notification remedy re Part 573.13 and Part 577.11 is not necessary.

How Remedy Component Differs from Recalled Component : Recall component – Software design configuration. Part Number – N/A (no p/n for software design configuration).

Identify How/When Recall Condition was Corrected in Production : NR

## Recall Schedule :

Description of Recall Schedule : Dealer notification is planned to begin and end on August 21, 2019.  
Customer notification is planned to begin and end on October 14, 2019.

Planned Dealer Notification Date : AUG 21, 2019 - AUG 21, 2019

Planned Owner Notification Date : OCT 14, 2019 - OCT 14, 2019

\* NR - Not Reported