



PIAGGIO

Piaggio Group Americas, Inc.

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May 12, 2008

Richard P. Boyd, Chief
Medium Heavy Duty Division
Office of Defects Investigation
1200 New Jersey Ave. SE
Washington D.C. 20590

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Re: Response of Piaggio Group Americas, Inc., to NHTSA Investigation PE 08-019.

Dear Mr. Boyd:

The following is Piaggio Group Americas, Inc., response to NHTSA investigation PE 08-019. This response is complete as to the information available to my office on the date of submission. In three instances, Piaggio is asking for additional time to further research information in order to provide a more complete response. Piaggio will complete our response to PE 08-019 with answers to these two questions in the near future. In addition Piaggio is providing an Attachment CD that includes the additional material and detail requested in PE 08-019. The material included on the Attachment CD are identified in the individual responses below.

Response to NHTSA inquiry PE 08-019

- 1) State, by model and model year the number of subject motorcycles Piaggio has manufactured for sale or lease in the United States. Separately for each subject motorcycle manufactured to date by Piaggio state the following.
 - a. Motorcycle identification number (VIN)
 - b. Model year
 - c. Model
 - d. Date of manufacture
 - e. Warranty coverage start date
 - f. Original purchaser first and last name, address and telephone number.
 - g. The selling dealer (business name)
 - h. Selling dealer identification code

RESPONSE TO QUESTION NO. 1: State, by model and model year the number of subject motorcycles Piaggio has manufactured for sale or lease in the United States. Separately for each subject motorcycle manufactured to date by Piaggio state the following.

- a. Motorcycle identification number (VIN)
 - The Attachment CD contains a VIN list of Aprilia RSV and Tuono models produced for sale in the US.



- i. This list also includes 7 VINs originally produced for sale in the US, but subsequently changed to European specifications for the Italian market. These VINs are highlighted in grey shading on the full VIN list and listed separately on an individual tab on the spreadsheet.
- ii. This list also includes 134 VINs produced for sale in the US that were sent to the Canadian Importer for that market. These VINs are highlighted in light green on the full VIN list and listed separately on an individual tab on the spreadsheet.
- b. Model year
 - This list includes model years 2004 through 2007 and 2008 through 04/18/2008 production.
- c. Model
 - Included
- d. Date of manufacture
 - Included
- e. Warranty coverage start date
 - Included
- f. Original purchaser first and last name, address and telephone number:
 - Included (the telephone number is provided where available from the original registration information.)
- g. The selling dealer (business name)
 - Included
- h. Selling dealer identification code
 - Included

- 2) State the number of each of the following, received by Piaggio, or of which Piaggio is otherwise aware, which relates to, or may relate to, the alleged defect.
- a. Consumer complaints.
 - b. Field reports, including dealer filed reports.
 - c. Reports involving a crash, injury or fatality, based on claims against the manufacturer involving a death or injury and/or notices received by the manufacturer alleging or proving that a death or injury was caused by a possible defect in a subject motorcycle.
 - d. Property damage claims
 - e. Third party arbitration proceedings where Piaggio is or was a party to the arbitration; and
 - f. Lawsuits, both pending and closed, where Piaggio is or was a defendant or codefendant.

For subparts "a" through "d", state the total number of each item (consumer complaints, etc.) separately. Multiple incidents involving the same motorcycle are to be counted separately. Multiple reports of the same incident are also to be counted separately (a consumer complaint and a field report involving the same incident in which a crash occurred are to be counted as a crash report, a field report and a consumer complaint.

In addition, for items "c" through "f" provide a summary description of the alleged problem and causal and contributing factors and Piaggio's assessment of the problem, with a summary of the significant underlying factor and evidence. For items "e" and "f", identify the parties to the action, as well as the caption, court, docket number and date on which the complaint or other document initiating the action was filed.

RESPONSE QUESTION NO. 2: State the number of each of the following, received by Piaggio, or of which Piaggio is otherwise aware, which relates to, or may relate to, the alleged defect.

- a) Consumer complaints:

- To be determined
 - b) Field reports, including dealer filed reports:
 - To be determined.
 - c) Reports involving a crash, injury or fatality, based on claims against the manufacturer involving a death or injury and/or notices received by the manufacturer alleging or proving that a death or injury was caused by a possible defect in a subject motorcycle:
 - None that we are aware of.
 - d) Property damage claims:
 - None that we are aware of.
 - e) Third party arbitration proceedings where Piaggio is or was a party to the arbitration:
 - None that we are aware of.
 - f) Lawsuits, both pending and closed, where Piaggio is or was a defendant or codefendant:
 - None that we are aware of.
- 3) Separately, for each item (complaint, report, claim, notice, or matter) within the scope of your response to Request No. 2, state the following information:
- a. Piaggio's file number or other identifier used.
 - b. The category of the item, as identified in Request No. 2
 - c. Motorcycle owner name, address and telephone number
 - d. Motorcycle VIN
 - e. Motorcycle model year and model
 - f. Motorcycle mileage at the time of the incident
 - g. Incident date
 - h. Report or claim date
 - i. Whether a crash is alleged
 - j. Whether property damage is alleged
 - k. Number of alleged injuries, if any
 - l. Number of alleged fatalities, if any.

RESPONSE TO QUESTION 3: Separately, for each item (complaint, report, claim, notice, or matter) within the scope of your response to Request No. 2, state the following information:

- a. Piaggio's file number or other identifier used.
 - b. The category of the item, as identified in Request No. 2
 - c. Motorcycle owner name, address and telephone number
 - d. Motorcycle VIN
 - e. Motorcycle model year and model
 - f. Motorcycle mileage at the time of the incident
 - g. Incident date
 - h. Report or claim date
 - i. Whether a crash is alleged
 - j. Whether property damage is alleged
 - k. Number of alleged injuries, if any
 - l. Number of alleged fatalities, if any
- Where stated, PGA is not aware of any of the various items mentioned in question 2. Regarding Consumer Complaints and Field Reports, the model years of the subject models cross between the reporting structures of Aprilia World Services and PGA. As a result, access to possible customer complaints and filed reports cannot be guaranteed. PGA is making additional efforts to search available data bases for customer complaints

and field reports, as described, in order to provide the most accurate answer. With the approval of ODI, the results of this additional search will be provided shortly.

- 4) Produce copies of all documents related to each item within the scope of Request no. 2. Organize the documents separately by category and describe the method Piaggio used for organizing the documents.

RESPONSE TO QUESTION 4: Produce copies of all documents related to each item within the scope of Request no. 2. Organize the documents separately by category and describe the method Piaggio used for organizing the documents.

- Please see PGA's response to questions 2 and 3.

- 5) State by model and model year, a total count for all of the following categories of claims, collectively, that have been paid by Piaggio to date that relate to, or may relate to, the alleged defect: warranty claims, extended warranty claims, claims for good will services that were provided; field, zone, or similar adjustments and reimbursement (including buy backs) and warranty claims or repairs made in accordance with a procedure specified in a technical service bulletin or customer satisfaction campaign.

RESPONSE TO QUESTION No. 5:

State by model and model year, a total count for all of the following categories of claims, collectively, that have been paid by Piaggio to date that relate to, or may relate to, the alleged defect: warranty claims, extended warranty claims, claims for good will services that were provided; field, zone, or similar adjustments and reimbursement (including buy backs) and warranty claims or repairs made in accordance with a procedure specified in a technical service bulletin or customer satisfaction campaign.

- See excel file of warranty claims on Attachment CD.

- 6) Describe in detail the search criteria used by Piaggio to identify the claims identified in response to Request No. 5 including the labor operation, problem codes, part numbers and any other pertinent parameter used. Provide a list of all operations, labor operations descriptions, problem codes, problem code descriptions and/or other codes applicable to the subject components and/or the alleged defect. In addition, provide a copy of the current "GGP User Manual – Dealer"

RESPONSE TO QUESTION No. 6:

Describe in detail the search criteria used by Piaggio to identify the claims identified in response to Request No. 5 including the labor operation, problem codes, part numbers and any other pertinent parameter used.

- PGA used the search mode in the warranty records 2006 through 2008 YTD for parts replaced under warranty on the 2004 – 2008 RSV 1000 series and Tuono 1000 series models. Part numbers identifying the subject components of in-tank fuel pump, fuel pipe (between the pump and the in-tank filter) and the hose clamp(s) securing the pipe to the pump and/or filter were segregated. A second report showing the claim details of warranty claims by part number was searched for each individual part. This search

provided the claim details for each motorcycle repaired under warranty where any one of the subject components was the causal part.

- Additionally, PGA received a list of claims and claim details from the older A2D warranty system that was used for Aprilia up until the 3rd quarter of 2006. These claims are identified in the provided excel file by a claim number preceded by a negative (-) sign.

Provide a list of all operations, labor operations descriptions, problem codes, problem code descriptions and/or other codes applicable to the subject components and/or the alleged defect.

- Symptom and causal codes and descriptions are provided in the details of each warranty claim. For this response, a folder in the Attachment CD, "Claim Details" shows these codes and descriptions for the claims submitted. It is the understanding of this office that a complete list of all codes and descriptions is not currently available as this information is provided in "drop down" box format as part of the dealer's warranty claim entry. The contents of the "drop down" box being dependent on the casual part identified. PGA will continue to work with our Italian colleagues to construct a reference list of this information. A copy of the codes applicable to the subject components and/or alleged defect will be provided to ODI when one becomes available.

In addition, provide a copy of the current "GGP User Manual – Dealer"

- See copy of GGP Manual provided on Attachment CD

- 7) State by model year, the terms of the new motorcycle warranty coverage offered by Piaggio on the subject motorcycles (number of months, mileage) for which coverage is provided and the motorcycle systems that are covered). Describe any extended warranty coverage option(s) that Piaggio offered for the subject motorcycles and state by option, model, and model year, the number of motorcycles that are covered under each such extended warranty.

RESPONSE TO QUESTION No. 7: State by model year, the terms of the new motorcycle warranty coverage offered by Piaggio on the subject motorcycles (number of months, mileage) for which coverage is provided and the motorcycle systems that are covered). Describe any extended warranty coverage option(s) that Piaggio offered for the subject motorcycles and state by option, model, and model year, the number of motorcycles that are covered under each such extended warranty.

- The new vehicle limited warranty covering the 2004 – 2008 model year Aprilia RSV and Tuono model variants was and is 24 months without mileage limitations. This warranty covers defects in material and workmanship. An additional warranty is provided for emissions control systems. No extended warranty is offered by PGA for these models.

- 8) Produce copies of all service, warranty and other documents that relate to, or may relate to, the alleged defect and or a subject component, that Piaggio has provided to any dealers, regional, or zone offices, field offices, fleet purchasers, customers or other entities. This includes, but is not limited to bulletins, advisories, informational documents, training documents or other documents or communications with the exception of standard shop manuals. This also includes any material related to before –sale motorcycle preparation at the dealer location. Also include the latest draft copy of any communication that Piaggio is planning to issue within the next 120 days.

RESPONSE TO QUESTION 8: Produce copies of all service, warranty and other documents that relate to, or may relate to, the alleged defect and or a subject component, that Piaggio has provided to any dealers, regional, or zone offices, field offices, fleet purchasers, customers or other entities. This includes, but is not limited to bulletins, advisories, informational documents, training documents or other documents or communications with the exception of standard shop manuals. This also includes any material related to before –sale motorcycle preparation at the dealer location. Also include the latest draft copy of any communication that Piaggio is planning to issue within the next 120 days.

- Attachment CD includes a copy of Technical Bulletin 015-2004; Subject: “Replacement of fuel level sender, fuel pump assembly and instrument panel on the ETV Caponord and RSV 1000”. PGA is not aware of any bulletins or communications to be published on this or related subject within the next 120 days.

- 9) Describe all assessments, analyses, tests, test results, studies surveys simulations investigations, inquiries and/or evaluations (collectively “actions”) that relate to , or may relate to, the alleged defect, that have been conducted, are being conducted, are planned or are being planned by, or for, Piaggio. For each such action, provide the following information:
- a. Action title r identified
 - b. The actual or planned start date
 - c. The actual or expected end date
 - d. Brief summary of the subject and the objective of the action
 - e. Engineering group(s)/supplier(s) response for designing and for conducting the action; and
 - f. A brief summary of the findings and/or conclusions resulting from the action.

For each action identified, provide copies of all documents related to the actions, regardless of whether the documents are in interim draft or final form. Organize the documents chronologically by action.

RESPONSE TO QUESTION 9: Describe all assessments, analyses, tests, test results, studies surveys simulations investigations, inquiries and/or evaluations (collectively “actions”) that relate to , or may relate to, the alleged defect, that have been conducted, are being conducted, are planned or are being planned by, or for, Piaggio. For each such action, provide the following information:

- a. Action title r identified
- b. The actual or planned start date
- c. The actual or expected end date
- d. Brief summary of the subject and the objective of the action
- e. Engineering group(s)/supplier(s) response for designing and for conducting the action; and
- f. A brief summary of the findings and/or conclusions resulting from the action.

For each action identified, provide copies of all documents related to the actions, regardless of whether the documents are in interim draft or final form. Organize the documents chronologically by action.

- Piaggio Group Americas, Inc., is not aware of any assessments, tests, surveys, inquiries, etc related to the alleged defect.

- 10) Describe all modifications or changes made by, or on behalf of, Piaggio in the design, material composition, manufacture, quality control, supply, or installation of a subject component, from the start of production to date, which relate to, or may relate to, the alleged defect. For each such modification or change, provide the following information:
- a. The date or approximate date on which the modification or change was incorporated into motorcycle production
 - b. A detailed description of the modification or change.
 - c. The reason for the modification or change
 - d. The part numbers (service and engineering) of the modified component
 - e. The original component supplier (corporate name and address)
 - f. The part number (service and engineering) of the modified component
 - g. The modified component supplier (corporate name and address)
 - h. Whether the original unmodified component was withdrawn from production and/or sale and if so, when.
 - i. When the modified component was made available as a service component; and
 - j. Whether the modified component can be interchanged with the earlier components.

RESPONSE TO QUESTION 10: Describe all modifications or changes made by, or on behalf of, Piaggio in the design, material composition, manufacture, quality control, supply, or installation of a subject component, from the start of production to date, which relate to, or may relate to, the alleged defect. For each such modification or change, provide the following information:

- a. The date or approximate date on which the modification or change was incorporated into motorcycle production
 - b. A detailed description of the modification or change.
 - c. The reason for the modification or change
 - d. The part numbers (service and engineering) of the modified component
 - e. The original component supplier (corporate name and address)
 - f. The part number (service and engineering) of the modified component
 - g. The modified component supplier (corporate name and address)
 - h. Whether the original unmodified component was withdrawn from production and/or sale and if so, when.
 - i. When the modified component was made available as a service component; and
 - j. Whether the modified component can be interchanged with the earlier components.
- Piaggio is not aware of any such changes.

- 11) Also, provide the above information for any modification or change that Piaggio is aware of which may be incorporated into motorcycle production within the next 120 days.

RESPONSE TO QUESTION No. 11: Also, provide the above information for any modification or change that Piaggio is aware of which may be incorporated into motorcycle production within the next 120 days.

- PGA is not aware of any such change.

- 12) Provide a listing if all Piaggio (including Piaggio, Aprilia, Moto Guzzi and Vespa brand) dealers in the United States. Please provide the following information for each dealer identified:
- a. Dealer name

- b. Dealer mailing address
- c. Dealer code
- d. Brands carried

RESPONSE TO QUESTION 12: Provide a listing of all Piaggio (including Piaggio, Aprilia, Moto Guzzi and Vespa brand) dealers in the United States. Please provide the following information for each dealer identified:

- a. Dealer name
- b. Dealer mailing address
- c. Dealer code
- d. Brands carried

- See Attachment CD contains the dealer list.

13) Furnish Piaggio's assessment of the alleged defect, including:

- a. The causal or contributory factor(s)
- b. The failure mechanism
- c. The failure mode
- d. The risk to motor vehicle safety that it poses
- e. What warnings, if any, a motorcycle owner would have that the alleged defect was about to occur
- f. The attached owner's reports prompting this inquiry.

RESPONSE TO QUESTION 13: Furnish Piaggio's assessment of the alleged defect, including:

- a. The causal or contributory factor(s)
- b. The failure mechanism
- c. The failure mode
- d. The risk to motor vehicle safety that it poses
- e. What warnings, if any, a motorcycle owner would have that the alleged defect was about to occur
- f. The attached owner's reports prompting this inquiry.

- A review of the warranty claims entered for the three subject components indicated part replacements and repairs in several areas. As each of the subject components are related to the flow of fuel under pressure, any one of the issues claimed under warranty would affect the flow or the pressure of the flow and as such cause the engine to stop running, to run irregularly or to have problems starting.

To the rider of an Aprilia that is experiencing these symptoms, the indications of a problem in this area will be misfire, hesitation during acceleration, difficulty in starting, not starting at all and the possibility of the engine stalling or shutting off. It is the opinion of PGA that in the case where engine stalling or shutting off is experienced, the message to the rider is the same as if the bike were running out of gas. In these cases the engine shutting off is preceded by hesitation as the fuel pressure drops, rough running as the last of the fuel is used up and finally the engine shutting off.

There is always a risk to motor vehicle safety if a vehicle's anticipated performance is not available when requested by the driver/rider. So in these cases there is a risk, but one that is manageable due to the advance notice of a problem provided through rough running, hesitation and difficulties in starting or in not starting at all.

The problems, where specifically identified, include "irregular flow", "short circuit" and "fuel/air mixture defect" for the fuel pump; "fuel/air mixture defect", "Cut" or "Fuel leak" for the hose clamp and "Fault to be specified" for the fuel hose.

Without additional information, a logical interpretation of these problem areas would indicate inconsistencies in the fuel pump that produce either excessive or insufficient fuel pressure (irregular flow fuel/air mixture defect) or problems in the electrical switching of the fuel pump described as "short circuit".

For the hose clamp the claims can be interpreted as the hose clamps being tightened too tight ("Cut", "Fuel leak") or too loose ("Fuel leak", "Fuel/air mixture defect").

Regrettably the description "Fault to be specified" as provided for the two claims on the fuel hose is inconclusive.

The feeling of PGA is that the VIN count (21) in the claim volume (22) for the subject components is too low to indicate a specific problem in this area and when presented in comparison to the total US production (2,308) of the subject models, represents a less than 1.0% incidence of failure.

Regarding the provided owner's report that prompted this inquiry, there is no indication that this bike was brought to an authorized dealer for inspection, diagnosis or repair. As such, PGA has no information regarding what is meant by "ineffective" in relation to the factory hose clamps and no access to the parts replaced. If this interpretation is accurate, then there will be no warranty record of this repair available to PGA for review or analysis.

- 14) The following request relates to Piaggio's recall of certain Moto Guzzi EV and Griso and Vespa GTS motoscooters (07V-252) for stalling due to loosening of the fuel hose at the fuel pump: Furnish a chronological summary (including dates) of all the principle events that were the basis for the determination of the defect. The summary should include, but not be limited to, the number of reports, crashes, injuries, fatalities, and warranty claims known to Piaggio at the time it began investigating the defect and when it submitted its recall notice to the agency.

RESPONSE TO QUESTION No. 14: The following request relates to Piaggio's recall of certain Moto Guzzi EV and Griso and Vespa GTS motor scooters (07V-252) for stalling due to loosening of the fuel hose at the fuel pump: Furnish a chronological summary (including dates) of all the principle events that were the basis for the determination of the defect. The summary should include, but not be limited to, the number of reports, crashes, injuries, fatalities, and warranty claims known to Piaggio at the time it began investigating the defect and when it submitted its recall notice to the agency.

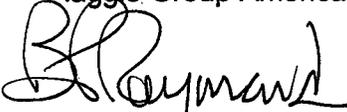
- The only model involved in recall 07V-252 was the Moto Guzzi Griso, within a specific VIN range. Neither the Moto Guzzi EV nor the Vespa GTS are included in recall 07V-252.
- The recall identified as 07V-252 originated with Moto Guzzi Italy. While certain US examples experienced the difficulties addressed in the recall, and a VIN range of US specification bikes is identified as affected, the bulk of the documentation supporting the initiation of this recall originated with Moto Guzzi Italy.

- PGA is working to collect warranty claim, customer complaint and field report information for our market. However PGA is asking ODI for additional time to respond to this question as we feel a more complete picture of the situation leading up to this recall will be provided if we include information from our Italian colleagues. PGA apologizes for the delay.

We trust that this response adequately responds to your inquiry. However, should you have any additional questions or wish to further discuss any issues in relation to PE 08-019, please feel free to contact me directly.

Best regards.

Piaggio Group Americas, Inc.

A handwritten signature in black ink, appearing to read "P. Raymond", written in a cursive style.

Patrick Raymond
Director Aftersales

Enclosures.