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By Recall Management Division at 10:11 am, Jan 11, 2012

January 10, 2012

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

**Re: Recall Campaign
Electric Auxiliary Water Pump
2007-11 MINI Cooper S, 2008-11 Cooper S Clubman, 2009-11 Cooper S
Convertible,
2009-11 MINI John Cooper Works (JCW), JCW Clubman, JCW Convertible,
2011 MINI Cooper S Countryman**

Dear Ms. Lewis:

This notice is 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 submit the following information.

1. **Manufacturer:** Bayerische Motoren Werke AG (BMW AG)
Designated Agent: Jan Urbahn
BMW of North America, LLC
Woodcliff Lake, New Jersey 07677

2. **Make:** BMW

<u>Model Year / Model:</u>	<u>Inclusive Dates of Manufacture:</u>
2007-11 MINI Cooper S	Nov 14, 2006 – Oct 27, 2010
2008-11 MINI Cooper S Clubman	Jul 26, 2007 – Oct 27, 2010
2009-11 MINI Cooper S Convertible	Dec 2, 2008 – Oct 27, 2010
2009-11 MINI JCW	Mar 11, 2008 – Oct 27, 2010
2009-11 MINI JCW Clubman	Mar 6, 2008 – Oct 26, 2010
2009-11 MINI JCW Convertible	Feb 9, 2009 – Oct 27, 2010
2011 MINI Cooper S Countryman	Aug 17, 2010 – Jan 18, 2011

3. The number of vehicles affected is approximately 88,911 as follows:

<u>Model</u>	<u>Approximate Number Affected</u>
MINI Cooper S	60,476
MINI Cooper S Clubman	16,079
MINI Cooper S Convertible	7,177
MINI JCW	1,864
MINI JCW Clubman	865
MINI JCW Convertible	349
MINI Cooper S Countryman	2,101

Company
BMW of North America, LLC

BMW Group Company

Mailing address
PO Box 1227
Westwood, NJ
07675-1227

Office address
300 Chestnut Ridge Road
Woodcliff Lake, NJ
07677-7731

Telephone
(201) 307-4000

Fax
(201) 571-5479

Website
bmwusa.com



4. The percentage of vehicles estimated to actually contain the condition is 100%.
5. The issue involves the electric auxiliary water pump on the models identified above that are equipped with 4-cylinder turbocharged engines. The auxiliary pump is controlled electronically by an engine control unit. After switching off the engine, the electric auxiliary water pump conducts heat away from the turbocharger.

Under certain conditions, the pump's electronic circuit board can malfunction. The malfunction can occur as a result of certain design features in combination with high operating temperatures. Under these conditions, this can lead to a failure of the water pump. In some cases, the circuit board can overheat. In an extreme case, overheating of the circuit board can lead to smoldering of the water pump. If smoldering occurs, it cannot be excluded that this may also lead to an engine compartment or vehicle fire.

The name, business address, telephone number, and contact person of the supplier, and country of origin of the component, is:

Gerd Zimutta
Legal Department
Pierburg Pump Technology GmbH
Alfred-Pierburg-Str. 1
41460 Neuss
Tel. +49 2131 5202037
Fax. +49 2131 5202166
Email: Gerd.Zimutta@de.kspg.com

Country of Origin – Germany

6. BMW became aware of this matter through its internal quality control analyses and processes.

In June 2009, the first occurrences of electric auxiliary water pump failure were noticed on internal test vehicles with BMW 8-cylinder engines. Initial analyses showed different fault patterns at the water pump circuit components.

MINI vehicles were also included in the analyses, although there are important differences between the operational characteristics of the pump in MINI and BMW vehicles. The MINI pump pushes cooled-down coolant into the turbocharger, whereas the BMW pump withdraws hot coolant out of the turbocharger. The MINI pump operates only after engine shut-down, and for a maximum of 15 minutes, whereas the BMW pump also operates during engine operation, and after engine shut-down for a maximum of 30 minutes. Therefore, the thermal load on the MINI pump is considerably lower.

In September 2009, the first occurrence of an electric auxiliary water pump failure was noticed on a MINI Cooper S field vehicle. Analysis of MINI parts returned from the field during 2009 indicated that one of the fault patterns could be electro-migration.

The field continued to be monitored, and in May and July 2010, two occurrences of field vehicles with a burned engine compartment were analyzed.

In July 2010, a Task Force was created to intensively analyze this issue. Between July and November 2010, further analyses were conducted. It was found that in

the field, thermal degradation of the auxiliary pump on certain Model Year MINI Cooper S vehicles was also occurring. There were 13 cases by July 2010 and 32 cases by November 2010 of auxiliary water pump failure worldwide. By November 2010, two occurrences of field vehicles with a burned engine compartment, one in the UK and one in Japan, were analyzed. Analyses of these vehicles pointed to the water pump.

In November 2010, electro-migration was confirmed as the root cause of the circuit board and water pump overheating failures.

The field continued to be monitored, and by November 2011, there were 81 known cases of auxiliary water pump failure worldwide. Four of these cases included a burned engine compartment noted above.

On October 11, 2011, NHTSA opened Preliminary Evaluation PE11-036, and on October 18, 2011, NHTSA submitted the PE11-036 Information Request letter to BMW. On November 14, 2011, NHTSA submitted an amended Information Request letter to BMW.

In December 2011, final testing and analyses of the MINI water pump was completed.

On January 3, 2012, BMW decided to conduct a voluntary recall.

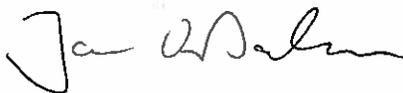
BMW has not received any reports, nor is BMW otherwise aware, of any accidents or injuries related to this issue.

7. Not applicable.
8. BMW will conduct a recall campaign to remedy the affected vehicles. The electric auxiliary water pump will be replaced.

BMW expects to begin dealer notification in January, and begin and complete owner notification in February.

9. Not applicable.
10. A copy of the Service Bulletin will be submitted when available.
11. A draft copy of the owner notification letter is attached.
12. Not applicable.

Sincerely,



Jan Urbahn
General Manager
Safety Engineering and Intelligent Transportation Systems

Attachment

**TREAD ACT CUSTOMER REIMBURSEMENT PLAN
(MINI, a Division of BMW of North America, LLC)**

Please contact your authorized MINI dealer if you have paid for the repair described in this letter, and you would like to be considered for reimbursement. Expenses from repair facilities outside of the MINI dealer network will be considered; however, the procedure must meet MINI standards.

Your authorized MINI dealer will request a copy of this owner notification letter, as well as, a copy of your previously paid invoice, and then inspect the vehicle (if it is still in your possession) prior to submitting a claim on your behalf to MINI, a Division of BMW of North America, LLC for reimbursement.

Please note the following:

- Only a repair that is the subject of this safety recall is reimbursable, not consequential expenses such as towing, rental, accommodations, damage repairs, etc.
- When MINI Genuine Parts are used, the Manufacturers Suggested Retail Price (MSRP) will be considered as the guideline for reasonable charges.
- Expenses for repairs performed more than 10 days after the date of the last owner notification letter sent by MINI are not eligible for reimbursement.
- Taxes and hazardous waste disposal, where previously paid, are eligible for reimbursement.

We anticipate that your authorized MINI dealer will be able to answer any questions that you may have regarding your qualifications for reimbursement of a previous repair. If you qualify for such a reimbursement, they will also be able to advise you of the manner in which you could receive reimbursement.

We recommend that your authorized MINI dealer be your primary contact on this issue; however, our Customer Relations and Services Department may be contacted at 1-866-275-6464 for any special assistance that you may require.

Alternatively, you may submit your request for reimbursement to the following address:

Customer Relations and Services Department
MINI Division
BMW of North America, LLC
P.O. Box 1227
Westwood, NJ 07675-1227