

VIA CERTIFIED MAIL, RETURN RECEIPT REQUESTED, AND EMAIL

August 8, 2014

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

**Re: Special Technical Campaign Amendment, 14V-348
 Driver-side Frontal Air Bag System
 Model Year 2004- 2006 BMW 3 Series**

Dear Ms. Lewis:

On June 11, 2014, in support of NHTSA's Preliminary Evaluation (PE14-016) into Takata Holdings' airbags, and at the request of NHTSA, BMW agreed to conduct a voluntary limited regional parts collection campaign of the driver and passenger side frontal airbag from certain production dates of the vehicles identified below, although BMW had not at that time determined that a safety defect existed:

<u>Model Year / Model</u>	<u>Inclusive Dates of Manufacture</u>
2001 – 2005 / 3 Series Sedan	Jun 2000 – Aug 2005
2001 – 2006 / 3 Series Coupe	Jun 2000 – Aug 2006
2001 – 2005 / 3 Series Sports Wagon	Jun 2000 – Aug 2005
2001 – 2006 / 3 Series Convertible	Jun 2000 – Aug 2006

On July 10, 2014, BMW decided in an abundance of caution to expand its 13V-172 recall campaign to increase the affected vehicle population for replacement of the passenger-side frontal air bags to approximately 574,000 affected vehicles, identified below:

<u>Model Year / Model</u>	<u>Inclusive Dates of Manufacture</u>
2000 – 2005 / 3 Series Sedan	Jun 1999 – Aug 2005
2000 – 2006 / 3 Series Coupe	Jun 1999 – Aug 2006
2000 – 2005 / 3 Series Sports Wagon	Jan 2000 – Aug 2005
2000 – 2006 / 3 Series Convertible	Dec 1999 – Aug 2006
2001 – 2006 / M3 Coupe	Feb 2001 – May 2006
2001 – 2006 / M3 Convertible	Mar 2001 – Aug 2006

BMW filed the relevant document with NHTSA on July 15, 2014, and it was assigned 14V-428. This expanded recall now incorporates the production range and regions of the previously announced special technical campaign and hence will take precedence over the special technical campaign for the passenger-side frontal air bag. However, BMW will conduct recall campaign 14V-428 to initially target owners of vehicles manufactured with passenger-side inflators produced by Takata between June 1, 2000 and July 31, 2004 and with long-term exposure in the highest absolute humidity areas, specifically, Florida, Hawaii and Puerto Rico. BMW will cooperate in good faith with NHTSA to provide the replaced airbag systems from these vehicles to Takata for further testing and analysis.

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Although BMW has not yet determined that a safety defect exists, BMW will continue to cooperate in good faith with NHTSA to conduct special technical campaign 14V-348 to replace the driver-side frontal airbag on approximately 11,700 potentially affected vehicles with long-term exposure in Florida, Hawaii and Puerto Rico, as described below:

Model Year 2004 (Jan 2004 production and later)

325i Sedan, 325xi Sedan, 330i Sedan, 330xi Sedan, 325i Coupe, 330i Coupe, 325i Convertible, 330i Convertible, 325i Sports Wagon, 325xi Sports Wagon
M3 Coupe, M3 Convertible

Model Year 2005 (all production dates)

325i Sedan, 325xi Sedan, 330i Sedan, 330xi Sedan, 325i Coupe, 330i Coupe, 325i Convertible, 330i Convertible, 325i Sports Wagon, 325xi Sports Wagon
M3 Coupe, M3 Convertible

Model Year 2006 (all production dates until end of production in August 2006)

325i Coupe, 330i Coupe, 325i Convertible, 330i Convertible
M3 Coupe, M3 Convertible

The removed driver-side frontal air bag will subsequently be evaluated by BMW and Takata to determine if a defect and safety risk exists.

BMW initially notified its dealers of this planned activity in June. BMW intends to notify owners in September when parts become available. A copy of the Service Bulletin and draft owner notification letter will be submitted when available.

Sincerely,

BMW of NORTH AMERICA, LLC



Sam Campbell
Department Head
Safety Engineering and Intelligent Transportation Systems