



Mr. Jeffrey Giuseppe  
Associate Administrator for Enforcement  
NATIONAL HIGHWAY TRAFFIC SAFETY  
ADMINISTRATION  
1200 New Jersey Ave., SE  
Washington, DC 20590  
United States of America

**Automobili  
Lamborghini S.p.A.**

Vs. riferimento  
Vs. data  
Oggetto  
Data

**Inconsequential Non-Compliance**  
Sant'Agata Bolognese, May 09, 2019

Dear sirs,

Automobili Lamborghini has determined that Lamborghini Multi Purpose Vehicle Urus from 2018 to 2019 did not fully meet the requirements under S4.4.2. (a) and (c) "Rim markings for vehicles other than passenger cars" of Federal Motor Vehicle Safety Standard (FMVSS) § 571.110 "Tire Selection and Rims for Motor Vehicles, with a GVWR of 4,536 Kilograms (10,000 Pounds) or Less".

The subject vehicles have been equipped with rims, without the designation symbol "E" required under FMVSS 110, S4.4.2(a) and the certification symbol "DOT" required under FMVSS 110, S4.4.2(c).

Automobili Lamborghini argues that this noncompliance is inconsequential to motor vehicle safety for the following reasons:

The "DOT" marking signifies that the manufacturer of the rim has certified that the rim complies with all applicable FMVSSs. So, because "DOT" is a "certification," it is a violation of 49 U.S.C. 30115 ("Certification"), which does not require notification and remedy (see 74 Fed. Reg. 69,377).

On the other hand, the designation symbol under S4.4.2(a) is not considered a "certification" and indicates the source of the rim's published nominal dimensions. Thus, because a noncompliance under (a) is not a certification issue, which would implicate 49 U.S.C. 30115, Automobili Lamborghini has submitted a report pursuant to 49 CFR part 573.

The subject rims contain all information required within FMVSS § 571.110 and the omission of the correct designation symbol "E" required under S4.4.2(a) and the certification symbol "DOT" required under S4.4.2(c) will not prevent to properly match tires and rims in case of worn out tires. Also, the owner's manual and the tire placard, both contain the correct and complete size of rims installed on the subject vehicles. Furthermore, this matter will not affect the ability to clearly identify the subject rims in case of a parts recall. Therefore, this matter does not have any effect on motor vehicle safety.

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Partita I.V.A IT00591801204  
A socio unico



Automobili Lamborghini is unaware of any accidents, injuries or customer complaints related to the lack of these markings. The missing markings do not affect the performance of the wheels or the tire and wheel assemblies.

For these reasons, Automobili Lamborghini has filed a report pursuant to 49 CFR part 573, "Defect and Noncompliance Reports" and respectfully requests that NHTSA grant this petition in accordance with 49 CFR part 556 on the basis that the noncompliance described above is inconsequential to motor vehicle safety.

Sincerely yours,

A handwritten signature in black ink, appearing to read "P. Gabrielli", written over a horizontal line.

**Paolo Gabrielli**  
Head of After Sales  
Automobili Lamborghini S.p.A.

A handwritten signature in black ink, appearing to read "Maria Francesca Portincasa", written over a horizontal line.

**Maria Francesca Portincasa**  
Legal Services  
Automobili Lamborghini S.p.A.



Automobili Lamborghini

## Vehicle Report

Transaction ID: 19-001550-22141-11 (Amendment 1)

Required fields indicated with \*

Your report has been submitted. Your Transaction No. is 19-001550-22141-11.

**Manufacturer: Automobili Lamborghini**
Via Modena 12  
40019 - Italy 00 99999Diego Ramos Reis  
3493897075,This is a Noncompliance Report. Filing a petition pursuant to [49 CFR 556](#)
**Vehicle Information**
**Lamborghini Urus 2019 - 2020**

\* Model Yr. Start: 2019

\* Model Yr. End: 2020

Type: LIGHT VEHICLES

\* Make: Lamborghini

Body Style: SUV

\* Model: Urus

Powertrain: GAS

**Production Dates**  
 Begin: 08/30/2018  
 End: 04/10/2019

**Descriptive Information:**

The recall population was determined based on the start of production of the model line until this date. The entry into production of the correctly marked rims is foreseen for calendar week 25 (twenty five) of 2019. The Vin range and number of potentially involved vehicles will be updated accordingly. The recalled vehicles have been equipped with rims, without the designation symbol "E" required under FMVSS 110, S4.4.2(a) and the certification symbol "DOT" required under FMVSS 110, S4.4.2(c).

**VIN Range(s):** Begin: ZPBUA1ZL3KLA00747 End: ZPBUA1ZL2KLA04613

Number potentially involved: 595

Estimated percentage of involved with defect: 100%

**Defect / Noncompliance Description**

For this Defect/Noncompliance:

**\* Describe the defect or noncompliance:**

The subject vehicles are equipped with rims that do not comply with S4.4.2 (a) and (c) of FMVSS No. 110.

**If a noncompliance, provide the applicable FMVSS:**

110 - Tire selection and rims

**If applicable, provide any further FMVSS affected:**
**Describe the cause:**

Due to a human error, the new rim marking requirement for MPVs specified in S4.4.2 (a) and (c) of FMVSS No. 110 had not been implemented on the subject rims.

**\* Describe the safety risk:**

There is no safety risk, as the omission of the correct designation symbol "E" required under FMVSS 110, S4.4.2 (a) and the certification symbol "DOT" required under FMVSS 110, S4.4.2(c) will not prevent the proper matching of tires and rims when tires are replaced. Appropriate tire information is specified in the Owners Manual and on the tire information placard specified in S4.3 of FMVSS No.110. In addition, this matter will not affect the ability to clearly identify the subject rims in cases of a recall.

**Identify any warning which can precede or occur:**

Not applicable.

**This Recall affects all vehicles.**

If applicable, identify the manufacturer of the defective or noncompliant component. If the manufacturer of the component is unknown, provide the information for the company that supplied the subject component.

Component manufacturer

**Company Information**

**Company Name:** APP TECH  
**Country:** Italy  
**Address 1:** Via Levico 6  
**Address 2:**  
**City:** Mestrino (PD)  
**State:** FOREIGN STATES  
**Zip/Postal Code:** 35035

**Company Contact Information**

**First Name:** Lorenzo  
**Last Name:** Vezzani  
**Position:** Head of Production  
**Email:** lvezzani@apptech.it  
**Phone:** 393888269340

**Chronology of Defect / Noncompliance Determination**
**Provide the chronology of events leading up to the defect decision or test data for the noncompliance decision.:**

This issue was identified by Porsche AG (group brand) during review of replacement rims. Lamborghini became aware of the potential situation when Porsche filled the 573 notification form. At this point, Lamborghini began a thorough review of all MPV rims and potentially affected model series to identify which vehicles were affected. Resulting parts analysis revealed approximately 04 (four) different part numbers from two suppliers. Rims with correct marking will be available for both production and after sales within June 21st, 2019. On April 3rd, 2019, the matter was presented to the product safety committee at

Automobili Lamborghini S.p.A. and it was determined that the incorrect designation symbol "E" represents a noncompliance with S4.4.2 (a) and (c) of FMVSS No. 110.

### Identify the Remedy

**Describe the defect/noncompliance remedy program, including the manufacturer's plan for reimbursement.**

Automobili Lamborghini plans to file a petition for inconsequential noncompliance (Part 556) within 30 days of this notice.

**Describe what distinguishes the remedy component from the recalled component.**

Correct marking.

**Identify and describe how and when the recall condition was corrected in production.**

Urus vehicles manufactured starting from CW25 of 2019 will meet S4.4.2 (a) and (c) of FMVSS No. 110.

### Identify the Recall Schedule

**Describe the recall schedule for notifications.:**

To be defined.

**Planned Dealer Notification Begin Date:**

**Planned Dealer Notification End Date:**

**Planned Owner Notification Begin Date:**

**Planned Owner Notification End Date:**

**Manufacturer's identification code for this recall (if applicable):**

Please be reminded that owner notification letters must be mailed no more than 60 days from submission of this report.

### Manufacturer Comments to NHTSA Staff

There were 2 separate suppliers to Lamborghini involving the affected wheel rims. Only one could be uploaded to the portal. The other supplier is: SPEEDLINE S.R.L., Country: Italy, Address: Via Salgari, 6, City: Tabina di Santa Maria di Sala, Zip/Postal Code: 30036, Company Contact Information: Luca Massalin, Position: Key Account Manager, Email: Luca.Massalin@ronalgroup.com, Phone: +39 355 372 423.

### Document Upload

There are 0 documents associated with this report.

# Part 573 Safety Recall Report

# 19V-289

**Manufacturer Name :** Automobili Lamborghini

**Submission Date :** APR 10, 2019

**NHTSA Recall No. :** 19V-289

**Manufacturer Recall No. :** NR



## Manufacturer Information :

**Manufacturer Name :** Automobili Lamborghini

**Address :** Via Modena 12  
Sant'Agata Bolognese (BO) 40019 -  
Italy 00 99999

**Company phone :** 999

## Population :

**Number of potentially involved :** 595

**Estimated percentage with defect :** 100 %

## Vehicle Information :

**Vehicle 1 :** 2019-2020 Lamborghini Urus

**Vehicle Type :** LIGHT VEHICLES

**Body Style :** SUV

**Power Train :** GAS

**Descriptive Information :** The recall population was determined based on the start of production of the model line until this date. The entry into production of the correctly marked rims is foreseen for calendar week 25 (twenty five) of 2019. The Vin range and number of potentially involved vehicles will be updated accordingly. The recalled vehicles have been equipped with rims, without the designation symbol "E" required under FMVSS 110, S4.4.2(a) and the certification symbol "DOT" required under FMVSS 110, S4.4.2(c).

**Production Dates :** AUG 30, 2018 - APR 10, 2019

**VIN Range 1 : Begin :** ZPBUA1ZL3KLA00747 **End :** ZPBUA1ZL2KLA04613 ☒ Not sequential

## Description of Noncompliance :

**Description of the Noncompliance :** The subject vehicles are equipped with rims that do not comply with S4.4.2 (a) and (c) of FMVSS No. 110.

**FMVSS 1 :** 110 - Tire selection and rims

**FMVSS 2 :** NR

**Description of the Safety Risk :** There is no safety risk, as the omission of the correct designation symbol "E" required under FMVSS 110, S4.4.2 (a) and the certification symbol "DOT" required under FMVSS 110, S4.4.2(c) will not prevent the proper matching of tires and rims when tires are replaced. Appropriate tire information is specified in the Owners Manual and on the tire information placard specified in S4.3 of FMVSS No.110. In addition, this matter will not affect the ability to clearly identify the subject rims in cases of a recall.

**Description of the Cause :** Due to a human error, the new rim marking requirement for MPVs specified in

S4.4.2 (a) and (c) of FMVSS No. 110 had not been implemented on the subject rims.

Identification of Any Warning that can Occur : Not applicable.

## Supplier Identification :

### Component Manufacturer

Name : APP TECH

Address : Via Levico 6  
Mestrino (PD) FOREIGN STATES 35035

Country : Italy

## Chronology :

This issue was identified by Porsche AG (group brand) during review of replacement rims. Lamborghini became aware of the potential situation when Porsche filled the 573 notification form. At this point, Lamborghini began a thorough review of all MPV rims and potentially affected model series to identify which vehicles were affected. Resulting parts analysis revealed approximately 04 (four) different part numbers from two suppliers. Rims with correct marking will be available for both production and after sales within June 21st, 2019. On April 3rd, 2019, the matter was presented to the product safety committee at Automobili Lamborghini S.p.A. and it was determined that the incorrect designation symbol "E" represents a noncompliance with S4.4.2 (a) and (c) of FMVSS No. 110.

## Description of Remedy :

Description of Remedy Program : Automobili Lamborghini plans to file a petition for inconsequential noncompliance (Part 556) within 30 days of this notice.

How Remedy Component Differs from Recalled Component : Correct marking.

Identify How/When Recall Condition was Corrected in Production : Urus vehicles manufactured starting from CW25 of 2019 will meet S4.4.2 (a) and (c) of FMVSS No. 110.

## Recall Schedule :

Description of Recall Schedule : To be defined.

Planned Dealer Notification Date : NR - NR

Planned Owner Notification Date : NR - NR

\* NR - Not Reported