

August 20, 2019 VIA FEDERAL EXPRESS

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Porsche Cars North America, Inc. One Porsche Drive Atlanta, Georgia 30354 T: (770) 290-3500 F: (770) 290-1500

Ms. Heidi King Deputy Administrator National Highway Traffic Safety Administration 1200 New Jersey Avenue, S.E. Washington, DC 20590

#### RE: Part 556 Petition for Exemption from Notification and Remedy Provisions of Motor Vehicle Safety Act for Inconsequential Non-Compliance with FMVSS No. 108

Dear Ms. King:

Porsche has determined that certain Porsche 911 GT3 and 911 GT3 Touring vehicles did not fully meet the requirements of S8.1.4, "Mounting height of reflex reflectors," of Federal Motor Vehicle Safety Standard (FMVSS) § 571.108 "Lamps, reflective devices, and associated equipment." Porsche accordingly notified the National Highway Traffic Safety Administration (NHTSA) of the noncompliance pursuant to 49 C.F.R. Part 573. <sup>1</sup> This petition seeks exemption from the notice and remedy requirements of the Motor Vehicle Safety Act, pursuant to 49 U.S.C. §§ 30118(d) and 30120(h), and 49 C.F.R. Part 556, because the noncompliance is inconsequential to motor vehicle safety.

The subject vehicles have been equipped with rear reflex reflectors within the rear apron, that do not meet the required minimum installation height (15") specified in FMVSS 108, S8.1.4, Table I-a, based on the vehicles' factory setting ride height for the adjustable spring struts. The reflex reflectors in the subject vehicles have a mounting height of 14.8", 0.20" below the minimum height specified by FMVSS 108.

Porsche believes that this noncompliance is inconsequential to motor vehicle safety for the following reasons:

• The installation height requirements of reflectors defined under S8.1.4 are intended to assure a sufficient luminous intensity of the reflex reflectors towards the source of illumination. Although the rear reflex reflectors' installation height within the rear apron of the subject vehicles falls slightly below the specified minimum height by 0.20" (5 mm), Porsche has confirmed that the rear reflex reflectors meet or exceed all applicable FMVSS requirements regarding the luminous intensity performance stated under §571.108, S14 and all other relevant requirements of S8.1 and 8.2. Please see Attachment B, Photometric Test Results (Please note: Attachment C is a translation of the Test Results into English by the undersigned). The installation height does not affect the performance of the luminous intensity of the rear reflectors or the visibility of the subject vehicles.

<sup>&</sup>lt;sup>1</sup> Three copies of the defect information report filed by Porsche on July 24, 2019 are provided in accordance with 49 C.F.R. § 556.4(b)(6) as Attachment A.

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- Porsche is unaware of any accidents, injuries, warranty claims or customer complaints related to the slight shortfall of the rear reflex reflectors' installation height. The absence of indicant data supports the conclusion that the minimal deviation in mounting height does not affect the performance of the rear reflectors or the visibility of the subject vehicles.
- Porsche notes that NHTSA has previously granted a similar petition. See 79 Fed. Reg. 69558 (Nov. 21, 2014). In that petition, Harley-Davidson described a noncompliance with FMVSS 108 in which the rear reflex reflectors were mounted an average of 0.3" to 0.7" below the required 15" height. NHTSA determined that this noncompliance, where the deviation from the specified height was even greater than in the present case, was inconsequential to motor vehicle safety based primarily on the lack of reduction in conspicuity as compared to compliant vehicles. *Id.* Porsche respectfully suggests that its noncompliant vehicles are also equally conspicuous to its compliant vehicles, and that its petition should similarly be granted.
- The purpose of the FMVSS 108 reflex reflector requirement is to prevent crashes by permitting early detection of an unlighted motor vehicle at an intersection or when parked on or by the side of the road, and the height requirement is intended "to ensure adequate reflex reflector performance relative to headlamps that would illuminate them." See 82 Fed. Reg. 24204, 24205 (May 25, 2017).
- As documented in Attachment B, the photometry performance of the reflex reflectors in the subject vehicles well exceeds the minimum performance standards outlined in FMVSS 108, Table XVI. Based on the photometry performance of the reflectors in the subject vehicles, and the fact that the vehicles meet or exceed the requirements of S8.1 and 8.2 with regard to reflection performance, Porsche believes the vehicles satisfy the safety objectives of the standard.
- The noncompliance issue has been corrected in production vehicles and all vehicles currently being produced meet applicable mounting height requirements.
- The mounting height of the reflex reflectors complies with the minimum height requirements of the United Nations ECE regulations. Those regulations specify a minimum mounting height of 250 mm (or 9.84") for rear retro-reflectors. See UN R48, §6.14.4.2. The reflex reflectors in the subject Porsche vehicles, with a mounting height of 14.8", are well within this requirement.

For these reasons, Porsche respectfully requests that NHTSA grant this petition in accordance with 49 C.F.R. Part 556 on the basis that the noncompliance described above is inconsequential to motor vehicle safety, and exempt Porsche from the notification and remedy provisions of the Motor Vehicle Safety Act.

Ms. Heidi King Petition for Inconsequential Noncompliance August 20, 2019 Page 3 of 3

Sincerely,

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PORSCHE CARS NORTH AMERICA, INC.

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Walter A. Lewis, Sr. Manager Regulatory Affairs

Enclosures

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Attachment A

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Manufacturer:	Porsche Cars North America, Inc.		
ne Porsche Drive Ianta GA 30354		Walter Lewis 770-290-3500	Regulatory Affairs,Sr. Manager ,
	This is a Noncompliance Report. Fil	ing a petition pu	rsuant to <u>49 CFR 556</u>
Vehicle Inform Porsche 911 G			
* Model Yr. Start:	: 2018 * Model Yr. End: 2018	Туре:	LIGHT VEHICLES
* Make: Porsche		Body Style:	
* Model: 911 GT3	3	Powertrain:	
Production Dates	Begin: 08/30/2017	Descriptive I The recall pop	nformation: ulation was determined based on the start of vehicle production until the entry into
Production Dates		production of t	he optimized rear spring struts, which resulted in a higher vehicle ride height, which in
	End: 12/21/2018	turn effectively	raised the rear reflex reflector's height above the ground. The population was
		determined ba	sed on the start of vehicle production until the entry into production of different rear
			which produced a higher vehicle ride height, which effectively raised the rear reflex
			ht to a level at which it met the height requirements of FMVSS No. 108. The height of reflectors in the recalled vehicles is slightly (0.2") below the mounting height specified
		in FMVSS 108,	Table I-a. The non-recalled vehicles have rear reflex reflectors with a higher height
		above the grou	ind due to the different suspension components and ride height.
VIN Range(s)	Begin: WP0AC2A94JS174065 End: WP0AC2A90JS177075		
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Defect ( News			
Defect / Nonco	ompliance Description		
r this Defect/Nonco	ompliance:		
Describe the defu	ect or noncompliance:	* Describe t	he safety risk:
	do not comply with FMVSS 108, S8.1.4, since the rear reflex reflectors are mounted		res the subject issue is inconsequential because the subject reflectors have a much higher
	wired 15" above road curface specified in EMV/SS 108 Table I-a. The actual height is	nhotometric r	
	uired 15" above road surface specified in FMVSS 108, Table I-a. The actual height is		erformance than required and the slight deviation from mounting height does not impact
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Manufacturer's identification code for this recall (if applicable):	AKB5
Please be reminded that owner notification letters must be mailed no more than 60 days from submiss	ion of this report,
Manufacturer Comments to NHTSA Staff	
None,	
Document Upload	
There are 0 documents	associated with this report,

1200 New Jersey Avenue, SE, West Building Washington DC 20590 USA 1.888.327.4236 TTY 1.800.424.9153 This application works best in IE9 and above and recent versions of Firefox, Chrome and Safari .

Attachment A

afercar.go				
O U.S. Department of Taras	portation	Porsche Cars North America, Inc.		
hicle Rep		nan na sana na manana na manana na an a	~ « <i>k. em</i>	F Shamada A. Saka pa Califord particular and an and a set of a set of the
nsaction ID: 19- uired fields indica		nal Report)		
		our Transaction No. is 19-001042-22929-10.		
Manufacturer: i	Porsche Cars North Americ	a, Inc.		
ne Porsche Drive Ianta GA 30354			Walter Lewis 770-290-3500	Regulatory Affairs,Sr, Manager ),
		This is a Noncompliance Report, F	iling a petition pu	rsuant to <u>49 CFR 556</u>
Vehicle Informa Porsche 911 GT				
* Model Yr. Start:		Model Yr. End: 2018	Туре:	LIGHT VEHICLES
* Make: Porsche			Body Style:	2-DOOR
* Model: 911 GT3			Powertrain:	
Production Dates	Begin: 08/30/2017 End: 12/21/2018		production of t turn effectively determined ba spring struts, v reflector's helg the rear reflex in FMVSS 108,	Information: ulation was determined based on the start of vehicle production until the entry into the optimized rear spring struts, which resulted in a higher vehicle ride height, which in / raised the rear reflex reflector's height above the ground. The population was sed on the start of vehicle production until the entry into production of different rear which produced a higher vehicle ride height, which effectively raised the rear reflex it to a level at which it me the height requirements of FVVSS No. 108. The height of reflectors in the recalled vehicles is slightly (0.2") below the mounting height specified Table I-a. The non-recalled vehicles have rear reflex reflectors with a higher height und due to the different suspension components and ride height,
VIN Range(s):	Begin: WP0AC2A94JS174065	End: WP0AC2A90JS177075		
or this Defect/Noncor				
Describe the defe	ct or noncompliance: lo not comply with FMVSS 108, S8	1.1.4, since the rear reflex reflectors are mounted	Porsche believ	he safety risk: res the subject issue is inconsequential because the subject reflectors have a much higher reformance than required and the elight deviation from mountion height does not impact
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Manufacturer's identification code for this recall (if applicable):	AKB5
Please be reminded that owner notification letters must be mailed no more than 60 days from s	submission of this report.
Manufacturer Comments to NHTSA Staff	
None.	
Document Upload	
There are 0 doc	uments associated with this report.

1200 New Jersey Avenue, SE, West Building Washington DC 20590 USA 1.888.327.4236 TTY 1.800.424.9153 This application works best in IEB and above and recent versions of Firefox, Chrome and Safarl 2.....

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Attachment A

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0 U.S. Department of Years	portation	Porsche Cars North America, Inc.	A. 76. 02. 177.5 501000	مېنىسىنىش با مەرىپ ، مەرىپ ، <b>ئەرىپ بەرىپ بەرىپ بەرىپ بەرىپ</b> بەرىپ بەرىپ مەرىپ مەرىپ مەرىپ مەرىپ مەرىپ بەرىپ بەر
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nsaction ID: 19- guired fields indic		inal Report)		
-		Your Transaction No. is 19-001042-22929-10.		
Manufacturer:	Porsche Cars North Americ	ca, Inc.		
One Porsche Drive Atlanta GA 30354			Walter Lewis 770-290-3500	Regulatory Affairs,Sr. Manager ,
		This is a Noncompliance Report	, Filing a petition pu	rsuant to <u>49 CFR 556</u>
Vehicle Inform Porsche 911 G	POSTOCIAL CONTRACTOR CONTRACTOR CONTRACTOR			
* Model Yr. Start:	2018	* Model Yr. End: 2018	Type:	LIGHT VEHICLES
* Make: Porsche			Body Style:	2-DOOR
* Model: 911 GT3 Production Dates	Begin: 08/30/2017 End: 12/21/2018		production of turn effectively determined ba spring struts, a reflector's heig the rear reflex in FMVSS 108,	
VIN Range(s)	Begin: WP0AC2A94JS174065	End: WP0AC2A90JS177075	above the gro	
Number potentia	lly involved: 2610 Estim:	ated percentage of involved with defect: 10	00%	
Defect / Nonco	mpliance Description			
For this Defect/Nonco	mpliance:			
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Manufacturer's identification code for this recall (if applicable):	AKB5
Please be reminded that owner notification letters must be mailed no more than 60 days in	from submission of this report.
Manufacturer Comments to NHTSA Staff	
None.	
Document Upload	
There are	0 documents associated with this report,

1200 New Jersey Avenue, SE, West Building Washington DC 20590 USA 1.888.327.4236 TTY 1.800.424.9153 This application works best in IE9 and above and recent versions of Frefox, Chrome and Safari

#### PORSCHE

Attachment B

# Erprobungsbericht

		Seite 1 von 3
	Ersteller	Faussner
991 II GT3 Rückstrahler -	Projekt	992
	Abteilung	EEB 1
photometrische Vermessung	Datum	26.07.2019

# Inhaltsverzeichnis

1	Aufgabe und Zielsetzung	1
2	Durchführung	2
3	Kurzergebnis	2
4	Einzelergebnisse	3

# 1 Aufgabe und Zielsetzung

Erprobungsinhalt	Photometrische Vermessung der Seitenmarkierungs- rückstrahlerfunktion (SMRST) nach FMVSS 108 / SAE 594			
Erprobungszeitraum / Erprobungsort	12.12.2017 / PAG Lichtmesslabor Hemmingen			
Messtechnik	Goniophotometer GO-H 1660 Retroreflection Measuring Unit RETRO 2000			
Messaufnahme	PAG RP Aufnahme (STL) in 991II GT3 Einbaulage			
D	Bauteilbezeichnung	Teilenummer		
Prüfling	Rückstrahler	991.631.495.80		

Dr. Ing. h.c. F. Porsche Aktiengesellschaft



Für beide Messungen gilt: die Ausrichtung des Rückstrahlers entspricht der 991 II GT3 Einbaulage.

# 3 Kurzergebnis

	Ergebnis
Messung 1	i.0,
Messung 2	i.O.

Die maximale Abweichung zwischen beiden Messungen beträgt 3,6% (Messpunkt H-V (1°30')).

991 II GT3 Rückstrahler – photometrische Vermessung

#### PORSCHE

Erprobungsbericht

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# 4 Einzelergebnisse

Messung 1 (Referenzpunkt im Flächenschwerpunkt) PHOTOMETRIC RESULTS

Program:	SAE J 594 Red less 750mm		
Description:	SAE J594 Reflex reflector SAE J 594 red		
Name:	991_II_GT3_RST_Serie_SAE_Li_001-1		
Sachnummer:	991.631.495.80		
Meas -no.:	1		
Test distance:	30,482 m		
Voltage:	0.0000 V		
Current:	0,00000 A	Operator:	Matthias Damon
Comment:	12.12.2017 MD:	Date:	12.12.2017 15:45:07
Comment.	Nominallage	Date.	12.12.2017 10.40.07

#### SAE J 594 Red less 750mm

No.	Function	Min	Max	R [mcd/lx]	H [°]	V [°]	Unit	N.O.K.
1	H - V (12')	420	-	1088.0		0,00	mcd/lx	10
2	H - 10 U (12')	280	+	1061.0		10,00	mcd/lx	1.0.
3	H-5D(12)	280	- 4	963.0		-5,00	mod/lx	10
4	20 L - V (12')	140	-	1130.0		0.00	mcd/lx	10
5	20 R - V (12')	140	-	-326 J		0,00	mcd/lx	1.0.
6	H - V (1° 30')	6	-	60.4		0.00	mcd/lx	1.0,
7	H - 10 U (1° 30')	5	-	50,7		10,00	med/lx	1.0
8	H - 5 D (1° 30')	5	-	51.3		-5,00	mcd/lx	1.0.
9	20 L - V (1° 30')	3	-	54.0		0,00	mcd/lx	.0.
10	20 R - V (1° 30')	3	-	14.7		0.00	mcd/ix	1.0

#### Messung 2 (Referenzpunkt angehoben) PHOTOMETRIC RESULTS

Program:	SAE J 594 Red less 750mm					
Description:	SAE J594 Reflex reflector SAE J 594 red					
Name:	991 II GT3 RST Serie SAE Li 14mm 001-1					
Sachnummer:	991.631.495.80					
Measno.:	1					
Test distance:	30,482 m					
Voltage:	0,0060 ∨					
Current:	0,00000 A	Operator:	Matthias Dâmon			
Comment:	12.12.2017 MD:     - Rückstrahler 14 mm nach unten verschoben     Date:     12.12.2       - Referenzpunkt auf Min-Anbaulage inkl. Toleranzen     Date:     12.12.2		12.12.2017 15:55:11			

#### SAE J 594 Red less 750mm

No.	Function	Min	Max	R [mcd/lx]	H [°]	V [°]	Unit	N.O.K.
1	H - V (12')	420	-	1077.0		0,00	mcd/lx	1.0.
2	H - 10 U (12')	280	-	0.1901		10,00	mcd/lx	10
3	H - 5 D (12')	280		964.0		-5,00	mcd/lx	iD
4	20 L - V (12')	140	-	1133.0		0.00	mcd/lx	10
5	20 R - V (12')	140	-	326.0		0,00	mcd/lx	10
6	H - V (1º 30')	6		58.2		0,00	mcd/lx	10
7	H - 10 U (1° 30')	5	-	50,4		10,00	mcd/lx	10
8	H - 5 D (1° 30')	5	-	51,0.		-5,00	mcd/lx	10
9	20 L - V (1° 30')	3	-	54.0		0,00	mcd/lx	10
10	20 R - V (1° 30')	3	-	79.C		0,00	mcd/lx	10

991 II GT3 Rückstrahler - photometrische Vermessung

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Test Report

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991    GT3 Re	991 II GT3 Rear Reflex Reflectors - Photometric Measurements				
Prepared by:	Faussner				
Project:	992				
Department:	EEB 1				
Date:	7/26/2019				

## **Table of Contents**

- 1. Tasks and Goal Setting
- 2. Process
- 3. Short results
- 4. Individual Results

## 1. Tasks and Goal Setting

Test Contents	Photometric measurements of the side-marker rear reflex reflectors per FMVSS 108 / SAE 594
Test date range /Test Location	12-12-2017 / PAG Lighting Laboratory Hemmingen
Measurement Technology	Goniophotometer GO-H 1660 Retroreflection Measuring Unit RETRO 2000
Recording	PAG RP Recording (STL) in 991 II GT3 installation position
Test Piece	Component description: Reflector Part No.: 991.631.495.80

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Test Report

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#### 2. Process

Test per FMVSS 108 (S14.2.3 / Tabel XVI-a)

Measurement of the side maker rear reflex reflectors while observing the following reference points:

- Reference point Measurement 1:
- Reference point Measurement 2:
- functional surface center (Nominal location)

14 mm above functional surface center

Illustration of measuring points (please refer to the original document).

For both measurements: the orientation of the reflex reflector corresponds to the 991 II GT3 installation position.

#### 3. Short results

Measurement	Result	
1	0.K.	
2	О.К.	

The maximum deviation between both measurements is 3.6% (Measure point H-V (1°30')).

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Test Report

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## 4. Individual Results

Measurement 1 (functional surface center)

PHOTOMETRIC RESULTS

Program:	SAE J 594 Red less 750 mm			
Description:	SAE J 594 Reflex reflector SAE J 594 red			
Name: 991 II GT3 RST Series SAE Li 001-1				
Item Number:	991.631.495.80			
Measurement No.:	1			
Test Distance:	30.482 m			
Voltage:	0.0000 V			
Current: 0.00000 A				
Comment:	12.12.17 MD: Normal location, Operator: Matthias			
	Daemon, Date: 12.12.2017 3:00:07 pm			

#### SAE J 594 Red less 750 mm

No.	Function	Min	Max	R(mcd/lx)	H (°)	V (°)	Unit	N.O.K.
1	H – V (12')	420	-	1088.0		0.00	mcd/lx	0.K.
2	H 10 U (12')	280	-	1061.0		10.00	mcd/lx	0.K.
3	H – 5 D (12')	280	-	963.0		-5.00	mcd/lx	0.K.
4	20 L – V (12')	140	-	1130.0		0.00	mcd/lx	0.K.
5	20 R – V (12')	140	-	326.0		0.00	mcd/lx	0.K.
6	H – V (1° 30')	6	-	60.4		0.00	mcd/lx	0.K.
7	H – 10 U (1° 30')	5	-	50.7		10.00	mcd/lx	0.K.
8	H – 5 D (1° 30')	5	-	51.3		-5.00	mcd/lx	0.K.
9	20 L – V (1° 30')	3	-	54.0		0.00	mcd/lx	0.K.
10	20 R – V (1° 30')	3		19.7		0.00	mcd/lx	0.K.

#### Measurement 2 (functional surface center)

### PHOTOMETRIC RESULTS

Program:	SAE J 594 Red less 750 mm
Description:	SAE J 594 Reflex reflector SAE J 594 red
Name:	991 II GT3 RST Series SAE Li 14mm 001-1
Item Number:	991.631.495.80
Measurement No.:	1
Test Distance:	30.482 m

Voltage:	0.0000 V
Current:	0.00000 A
Comment:	12.12.17 MD: reflector location moved to 14 mm lower position (reference point to minimum position incl. tolerance), Operator: Matthias Daemon, Date: 12.12.2017 3:55:11 pm

SAE J 594 Red less 750 mm

1.76

No.	Function	Min	Max	R(mcd/lx)	H (°)	V (°)	Unit	N.O.K.
1	H – V (12')	420	-	1077.0		0.00	mcd/lx	0.K.
2	H 10 U (12')	280	-	1061.0		10.00	mcd/lx	0.K.
3	H – 5 D (12')	280	-	964.0		-5.00	mcd/lx	0.K.
4	20 L – V (12')	140	-	1133.0		0.00	mcd/lx	0.K.
5	20 R – V (12')	140	-	326.0		0.00	mcd/lx	0.K.
6	H – V (1° 30')	6	-	58.2		0.00	mcd/lx	0.K.
7	H – 10 U (1° 30')	5	-	50.4		10.00	mcd/lx	0.K.
8	H – 5 D (1° 30')	5	-	51.0		-5.00	mcd/lx	0.K.
9	20 L – V (1° 30')	3	-	54.0		0.00	mcd/lx	0.K.
10	20 R - V (1° 30')	3	-	19.6		0.00	mcd/lx	0.K.

END OF TRANSLATION OF PAGE 3

# Part 573 Safety Recall Report

Manufacturer Name :Porsche Cars North America, Inc.Submission Date :JUL 24, 2019NHTSA Recall No. :19V-543Manufacturer Recall No. :AKB5

## Manufacturer Information :

Manufacturer Name :Porsche Cars North America, Inc.Address :One Porsche DriveAtlanta GA 30354

Company phone : 1-800-767-7243

# Vehicle Information :

Vehicle 1:	2018-2018 Porsche 911 GT3
Vehicle Type :	LIGHT VEHICLES
Body Style :	2-DOOR
Power Train :	GAS
Descriptive Information :	The recall population was determined based on the start of vehicle production until the entry into production of the optimized rear spring struts, which resulted in a higher vehicle ride height, which in turn effectively raised the rear reflex reflector's height above the ground. The population was determined based on the start of vehicle production until the entry into production of different rear spring struts, which produced a higher vehicle ride height, which effectively raised the rear reflex reflector's height to a level at which it met the height requirements of FMVSS No. 108. The height of the rear reflex reflectors in the recalled vehicles is slightly (0.2") below the mounting height specified in FMVSS 108, Table I-a. The non-recalled vehicles have rear reflex reflectors with a higher height above the ground due to the different suspension components and ride height.
Production Dates :	AUG 30, 2017 - DEC 21, 2018
VIN Range 1:	Begin :WP0AC2A94JS174065End :WP0AC2A90JS177075Image: Mot sequential

# **Description of Noncompliance :**

	The subject vehicles do not comply with FMVSS 108, S8.1.4, since the rear reflex reflectors are mounted slightly below the required 15" above road surface specified in FMVSS 108, Table I-a. The actual height is approximately 14.8".
FMVSS 1 : FMVSS 2 :	108 - Lamps, reflective devices, and assoc. Equipment
	Porsche believes the subject issue is inconsequential because the subject reflectors have a much higher photometric performance than required and

The information contained in this report was submitted pursuant to 49 CFR §573



19V-543

# **Population**:

Number of potentially involved : 2,610 Estimated percentage with defect : 100 %

# Part 573 Safety Recall Report

Description of the Cause : Suspension ride height.

the slight deviation from mounting height does not impact vehicle visibility. Suspension ride height.

Identification of Any Warning None. that can Occur :

### **Supplier Identification :**

#### **Component Manufacturer**

Name : ThyssenKrupp Bilstein GmbH

Address : August-Bilstein-Strasse 4 Ennepetal FOREIGN STATES 58256 Country : Germany

#### **Chronology** :

This issue was identified during the development of a new derivative of the Porsche 911, the Speedster. The Speedster uses the rear bumper of the Porsche 911 GT3 as a carry-over part. As part of compliance review, Porsche identified a potential height deviation based on review of CAD data. Using laser measurement, Porsche measured 911 GT3 vehicles before and after rear suspension change and determined that on some GT3 vehicles before the suspension change, the reflex reflector mounting height fell outside of the requirements in S8.1.4, of FMVSS No. 108. On July 18, 2019, Porsche decided the issue was a non-compliance requiring Part 573 notification. Porsche intends to file a petition for inconsequential noncompliance pursuant to 49 C.F.R. part 556.

#### **Description of Remedy :**

Description of Remedy Program :	Porsche plans to file a petition a petition for inconsequential noncompliance (Part 556) within 30 days of this notice.
How Remedy Component Differs from Recalled Component :	
	The population was determined based on the start of vehicle production until the entry into production of different rear spring struts, which produced a higher vehicle ride height, which effectively raised the rear reflex reflector's height to a level at which it met the height requirements of FMVSS No. 108.

#### **Recall Schedule :**

Description of Recall Schedule : To be determined.

The information contained in this report was submitted pursuant to 49 CFR §573

# Part 573 Safety Recall Report

Planned Dealer Notification Date : NR - NR Planned Owner Notification Date : NR - NR

\* NR - Not Reported

The information contained in this report was submitted pursuant to 49 CFR §573

**19V-543**