



August 20, 2019
VIA FEDERAL EXPRESS

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

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

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 573.¹ 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.

¹ 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.

- 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,

PORSCHE CARS NORTH AMERICA, INC.

A handwritten signature in blue ink, appearing to read 'W. Lewis', is written over the printed name.

Walter J. Lewis, Sr. Manager
Regulatory Affairs

Enclosures

Attachment A



Porsche Cars North America, Inc.

Vehicle Report

Transaction ID: 19-001042-22929-10 (Original Report)

Required fields indicated with *

Your report has been submitted. Your Transaction No. is 19-001042-22929-10.

Manufacturer: Porsche Cars North America, Inc.

One Porsche Drive
Atlanta GA 30354Walter Lewis Regulatory Affairs, Sr. Manager
770-290-3500,

This is a Noncompliance Report. Filing a petition pursuant to 49 CFR 556

Vehicle Information

Porsche 911 GT3 2018

* Model Yr. Start: 2018

* Model Yr. End: 2018

Type: LIGHT VEHICLES

* Make: Porsche

Body Style: 2-DOOR

* Model: 911 GT3

Powertrain: GAS

Production Dates Begin: 08/30/2017
End: 12/21/2018

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.

VIN Range(s): Begin: WP0AC2A94J5174065 End: WP0AC2A90J5177075

Number potentially involved: 2610

Estimated percentage of involved with defect: 100%

Defect / Noncompliance Description

For this Defect/Noncompliance:

* Describe the defect or 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".

If a noncompliance, provide the applicable FMVSS:

108 - Lamps, reflective devices, and assoc. Equipment

If applicable, provide any further FMVSS affected:

Describe the cause:

Suspension ride height.

* Describe the safety risk:

Porsche believes the subject issue is inconsequential because the subject reflectors have a much higher photometric performance than required and the slight deviation from mounting height does not impact vehicle visibility.

Identify any warning which can precede or occur:

None.

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: ThyssenKrupp Bilstein
GmbH

Country: Germany

Address 1: August-Bilstein-Strasse 4

Address 2:

City: Ennepetal

State: FOREIGN STATES

Zip/Postal Code: 58256

Company Contact Information

First Name: Kevin

Last Name: Umlauf

Position: Key Account

Email: kevin.umlau@thyssenkrupp.com

Phone: 4923497464749

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 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.

Identify the Remedy

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

Porsche 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.

Not applicable.

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

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.

Identify the Recall Schedule

Describe the recall schedule for notifications:

To be determined.

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):

AKB5

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

None.

Document Upload

There are 0 documents associated with this report.

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This application works best in IE9 and above and recent versions of Firefox, Chrome and Safari

Attachment A



U.S. Department of Transportation

Porsche Cars North America, Inc.

Vehicle Report

Transaction ID: 19-001042-22929-10 (Original Report)

Required fields indicated with *

Your report has been submitted. Your Transaction No. is 19-001042-22929-10.

Manufacturer: Porsche Cars North America, Inc.

One Porsche Drive
Atlanta GA 30354Walter Lewis Regulatory Affairs, Sr. Manager
770-290-3500,

This is a Noncompliance Report, Filing a petition pursuant to 49 CFR 556

Vehicle Information

Porsche 911 GT3 2018

* Model Yr. Start: 2018

* Model Yr. End: 2018

Type: LIGHT VEHICLES

* Make: Porsche

Body Style: 2-DOOR

* Model: 911 GT3

Powertrain: GAS

Production Dates
Begin: 08/30/2017
End: 12/21/2018

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.

VIN Range(s): Begin: WP0AC2A94JS174065 End: WP0AC2A90JS177075

Number potentially involved: 2610 Estimated percentage of involved with defect: 100%

Defect / Noncompliance Description

For this Defect/Noncompliance:

* Describe the defect or 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".

If a noncompliance, provide the applicable FMVSS:

108 - Lamps, reflective devices, and assoc. Equipment

If applicable, provide any further FMVSS affected:

Describe the cause:

Suspension ride height.

* Describe the safety risk:

Porsche believes the subject issue is inconsequential because the subject reflectors have a much higher photometric performance than required and the slight deviation from mounting height does not impact vehicle visibility.

Identify any warning which can precede or occur:

None.

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: ThyssenKrupp Bilstein GmbH

Country: Germany

Address 1: August-Bilstein-Strasse 4

Address 2:

City: Ennepetal

State: FOREIGN STATES

Zip/Postal Code: 58256

Company Contact Information

First Name: Kevin

Last Name: Umlauf

Position: Key Account

Email: kevin.umlau@thyssenkrupp.com

Phone: 4923497464749

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 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.

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

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

Describe what distinguishes the remedy component from the recalled component.

Not applicable.

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To be determined.

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):

AKB5

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

None.

Document Upload

There are 0 documents associated with this report.

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This application works best in IE9 and above and recent versions of Firefox, Chrome and Safari!

Attachment A



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One Porsche Drive
Atlanta GA 30354Walter Lewis Regulatory Affairs, Sr. Manager
770-290-3500,

This is a Noncompliance Report. Filing a petition pursuant to 49 CFR 556

Vehicle Information

Porsche 911 GT3 2018

* Model Yr. Start: 2018

* Model Yr. End: 2018

Type: LIGHT VEHICLES

* Make: Porsche

Body Style: 2-DOOR

* Model: 911 GT3

Powertrain: GAS

Production Dates
Begin: 08/30/2017
End: 12/21/2018

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.

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Planned Dealer Notification End Date:

Planned Owner Notification Begin Date:

Planned Owner Notification End Date:

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

AKB5

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Manufacturer Comments to NHTSA Staff

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This application works best in IE9 and above and recent versions of Firefox, Chrome and Safari

Erprobungsbericht

Seite 1 von 3

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

Inhaltsverzeichnis

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

1 Aufgabe und Zielsetzung

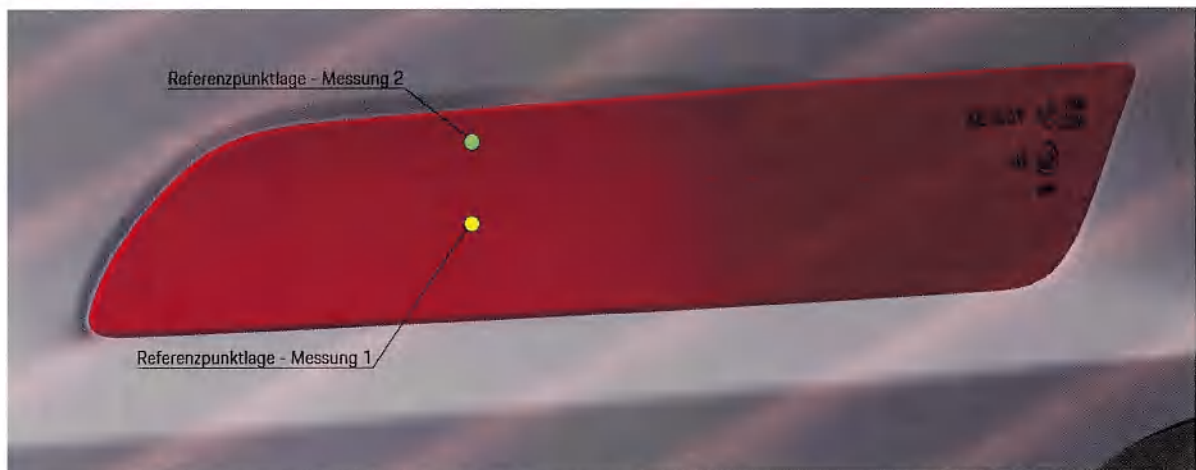
Erprobungsinhalt	Photometrische Vermessung der Seitenmarkierungs- rückstrahlerfunktion (SMRST) nach FMVSS 108 / SAE 594	
Erprobungszeitraum / Erprobungsort	12.12.2017 / PAG Lichtmesslabor Hemmingen	
Messtechnik	Goniophotometer GO-H 1660 Retroreflection Measuring Unit RETRO 2000	
Messaufnahme	PAG RP Aufnahme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

2 Durchführung

Prüfung gemäß FMVSS 108 (S14.2.3 / Tabelle XVI-a)

Vermessung des Seitenmarkierungsrückstrahlers unter Berücksichtigung der folgenden Referenzpunktlagen:

- Referenzpunktlage – Messung 1: Funktionsflächenschwerpunkt SMRST (Nominallage)
- Referenzpunktlage – Messung 2: 14mm ggü. Flächenschwerpunkt angehoben



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

3 Kurzergebnis

	Ergebnis
Messung 1	I.O.
Messung 2	I.O.

Die maximale Abweichung zwischen beiden Messungen beträgt 3,6% (Messpunkt H-V ($1^{\circ}30'$)).

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 Dämon		
Comment:	12.12.2017 MD: Nominallage		
Date:	12.12.2017 15:45:07		

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	1.0
2	H - 10 U (12°)	280	-	1061.0		10.00	mcd/lx	1.0
3	H - 5 D (12°)	280	-	963.0		-5.00	mcd/lx	1.0
4	20 L - V (12°)	140	-	1130.0		0.00	mcd/lx	1.0
5	20 R - V (12°)	140	-	325.0		0.00	mcd/lx	1.0
6	H - V (1° 30')	6	-	50.4		0.00	mcd/lx	1.0
7	H - 10 U (1° 30')	5	-	50.7		10.00	mcd/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	1.0
10	20 R - V (1° 30')	3	-	114.7		0.00	mcd/lx	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		
Meas.-no.:	1		
Test distance:	30,482 m		
Voltage:	0.0000 V		
Current:	0.00000 A		
Operator:	Matthias Dämon		
Comment:	12.12.2017 MD: - Rückstrahler 14 mm nach unten verschoben - Referenzpunkt auf Min-Anbaulage inkl. Toleranzen		
Date:	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	-	1061.0		10.00	mcd/lx	1.0
3	H - 5 D (12°)	280	-	964.0		-5.00	mcd/lx	1.0
4	20 L - V (12°)	140	-	1133.0		0.00	mcd/lx	1.0
5	20 R - V (12°)	140	-	325.0		0.00	mcd/lx	1.0
6	H - V (1° 30')	6	-	50.2		0.00	mcd/lx	1.0
7	H - 10 U (1° 30')	5	-	50.4		10.00	mcd/lx	1.0
8	H - 5 D (1° 30')	5	-	51.0		-5.00	mcd/lx	1.0
9	20 L - V (1° 30')	3	-	54.0		0.00	mcd/lx	1.0
10	20 R - V (1° 30')	3	-	114.6		0.00	mcd/lx	1.0

START OF TRANSLATION OF PAGE 1

PORSCHE

Test Report

Page 1 of 3

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

END OF TRANSLATION OF PAGE 1

START OF TRANSLATION OF PAGE 2

PORSCHE

Test Report

Page 2 of 3

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: functional surface center (Nominal location)
- Reference point – Measurement 2: 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	O.K.
2	O.K.

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

END OF TRANSLATION OF PAGE 2

START OF TRANSLATION OF PAGE 3

PORSCHE

Test Report

Page 3 of 3

4. Individual ResultsMeasurement 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	O.K.
2	H 10 U (12')	280	-	1061.0		10.00	mcd/lx	O.K.
3	H – 5 D (12')	280	-	963.0		-5.00	mcd/lx	O.K.
4	20 L – V (12')	140	-	1130.0		0.00	mcd/lx	O.K.
5	20 R – V (12')	140	-	326.0		0.00	mcd/lx	O.K.
6	H – V (1° 30')	6	-	60.4		0.00	mcd/lx	O.K.
7	H – 10 U (1° 30')	5	-	50.7		10.00	mcd/lx	O.K.
8	H – 5 D (1° 30')	5	-	51.3		-5.00	mcd/lx	O.K.
9	20 L – V (1° 30')	3	-	54.0		0.00	mcd/lx	O.K.
10	20 R – V (1° 30')	3	-	19.7		0.00	mcd/lx	O.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

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

END OF TRANSLATION OF PAGE 3

Part 573 Safety Recall Report

19V-543

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

Manufacturer Name : Porsche Cars North America, Inc.

Number of potentially involved : 2,610

Address : One Porsche Drive
Atlanta GA 30354

Estimated percentage with defect : 100 %

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 : WP0AC2A94JS174065 End : WP0AC2A90JS177075

☒ Not sequential**Description of Noncompliance :**

Description of the 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 : 108 - Lamps, reflective devices, and assoc. Equipment

FMVSS 2 : NR

Description of the Safety Risk : Porsche believes the subject issue is inconsequential because the subject reflectors have a much higher photometric performance than required and

Description of the Cause : the slight deviation from mounting height does not impact vehicle visibility.
Suspension ride height.

Identification of Any Warning that can Occur : None.

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 : Not applicable.

Identify How/When Recall Condition was Corrected in Production : 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.

Planned Dealer Notification Date : NR - NR

Planned Owner Notification Date : NR - NR

* NR - Not Reported