



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, March 25, 2020

Dear sirs,

Automobili Lamborghini has determined that Lamborghini Vehicle Huracan from 2015 to 2020 did not fully meet the requirements under 49 CFR 571.108, Federal Motor Vehicle Safety Standard (FMVSS) No. 108 Lamps, Reflective Devices and Associated Equipment, point S10.18.9.2. Automobili Lamborghini has submitted a report pursuant to 49 CFR part 573.

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The horizontal aim adjustment of the subject beams is possible, due to the absence of a blanking cap over the beam horizontal adjustment screw. Demounting the luggage compartment liner, customers, with advanced technical knowledge, can reach the horizontal adjustment screw and make the horizontal adjustment by themselves.

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

- First, the adjustment screw is hidden by the luggage liner when the vehicle's hood is open, so the screw is not visible.
- Second, the Owner manual does not identify this screw so no vehicle owner would ever need to try to search for and adjust the screw in question.

The only possibility to reach the adjustment screw without removing the luggage liner is through a small hole in the luggage liner using a long screwdriver, but without any possibility to see it and without any indication on how to do it.

Automobili Lamborghini is unaware of any accidents, injuries or customer complaints related to the horizontal aim adjustment of the subject beams.

The entry into production of the correct headlamps is foreseen for calendar week 15 (fifteen) of 2020.

Capitale Sociale
€ 130.000.000
R.E.A. Bologna 259882
Codice Fiscale 03049840378
Partita I.V.A IT00591801204
A socio unico
Società del Gruppo Audi



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 "Paolo 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.