

BMW Group

December 18, 2023

National Highway Traffic Safety Administration
Docket Management Facility
U.S. Department of Transportation
1200 New Jersey Avenue, SE
West Building, Ground Floor, Room W12-140
Washington, DC 20590-0001

**Re: Docket NHTSA-2023-0038
NHTSA Initial Decision re EA16-003**

BMW of North America, LLC, on behalf of BMW AG, Munich, Germany (“BMW”) is voluntarily submitting our comments to the subject Docket. BMW appreciates the opportunity to provide comments in response to the National Highway Traffic Safety Administration’s (NHTSA) Initial Decision concerning certain driver and passenger front air bag inflators manufactured by ARC Automotive Inc.

BMW understands that since it is not the manufacturer of the equipment at issue, it is not presently the focus of EA16-003 nor of NHTSA’s Initial Decision. However, it may be affected by subsequent decisions or actions by the agency.

As a portion of our comments are considered by BMW to be confidential, those comments are not being submitted to the Docket but, rather, are only being submitted to the NHTSA Office of Chief Counsel with a corresponding request for confidentiality, and a copy of the non-confidential portion of our comments.

BMW appreciates NHTSA’s review and consideration of our comments on this important matter, and the additional time granted by the agency in which to respond, which has allowed for a more comprehensive review and analysis of the available information.

Company
BMW of North America, LLC

BMW Group Company

Mailing address
PO Box 1227
Westwood, NJ
07675-1227

Office address
300 Chestnut Ridge Road
Woodcliff Lake, NJ
07677-7731

Telephone
(201) 307-4000

Fax
(201) 571-5479

Sincerely,

Thomas Ruemenapp
Vice President
Engineering US

Attachment:

BMW Comments-(18Dec2023) – Public Version

Cc:

Ashley Simpson, NHTSA OCC
Allison Hendrickson, NHTSA OCC