



U.S. Department
of Transportation

**National Highway
Traffic Safety
Administration**

ODI RESUME

Investigation: TQ 10-006
Prompted by:
Date Opened: 12/15/2010
Investigator: Alexander Ansley
Approver: Richard Boyd
Subject: Part 573 Report Completeness Concerns
Reviewer: Jennifer Timian

MANUFACTURER & PRODUCT INFORMATION

Manufacturer: BMW OF NORTH AMERICA, LLC
Products: Various BMW vehicles recalled in 2010
Population: 338,708 (Estimated)
Problem Description: BMW has submitted several Part 573 reports over the last year where many are missing critical information such as remedy plans, population figures and detailed chronologies.

FAILURE REPORT SUMMARY

	ODI	Manufacturer	Total
Complaints:	0	TBD	TBD
Crashes/Fires:	0	TBD	TBD
Injury Incidents:	0	TBD	TBD
Fatality Incidents:	0	TBD	TBD
Other*:	0	TBD	TBD
*Description of Other:			

ACTION / SUMMARY INFORMATION

Action: Open TQ

Summary:

The Recall Management Division (RMD) has conducted a review of BMW of North America, LLC's (BMW) defect and noncompliance information reports (Part 573 reports) over the past calendar year and noted a troubling trend. BMW appears to maintain a practice, by design or habit, in which it provides little information in its initial filings. Where information required to be provided as part of a recall report is not provided initially, BMW will assure it will provide that information, but then takes an inordinate amount of time to do so.

For example, of the 16 Part 573 reports BMW filed this year, in only 6 was it able to tell the agency the number of vehicles affected by the defect or noncompliance and expected to be recalled. In only 5 recalls reports was BMW able to supply any chronology of principal events, and only 1 of these 5 chronologies met the bare minimum for such a chronology, (e.g., chronologies with missing dates of compliance testing, missing dates of field reports received, and/or not summarizing or providing a count of field reports or claims received). Also, reviewing the updates BMW has supplied on the recalls, it has taken BMW over 30 days, on average, to provide required information, including such fundamental information as population figures. An information request (IR) letter to BMW will request that these missing or incomplete components be submitted to RMD promptly.

This timeliness query (TQ) investigation is being opened in order to more fully understand what information BMW has before it when it makes its defect and noncompliance decisions and how and when that information is provided to the agency.