



U.S. Department of Transportation
**National Highway Traffic Safety
Administration**

1200 New Jersey Avenue SE
Washington, DC 20590

September 5, 2019

Ms. Helen Riehle
Safety Integrity and Recall Manager
BMW of North America, LLC
300 Chestnut Ridge Road
Woodcliff Lake, NJ 07677

NEF-150JK
19V-612

Subject: Brake Lights may be Dim/FMVSS 108

Dear Ms. Riehle:

This letter serves to acknowledge BMW of North America, LLC's notification to the National Highway Traffic Safety Administration (NHTSA) of a safety recall which will be conducted pursuant to Federal law for the product(s) listed below. Please review the following information to ensure that it conforms to your records as this information is being made available to the public. If the information does not agree with your records, please contact us immediately to discuss your concerns.

Makes/Models/Model Years:

ROLLS-ROYCE/CULLINAN/2019

Mfr's Report Date: August 21, 2019

NHTSA Campaign Number: 19V-612

Components:

EXTERIOR LIGHTING:BRAKE LIGHTS

Potential Number of Units Affected: 403

Problem Description:

BMW of North America, LLC (BMW) is recalling certain 2019 Rolls-Royce Cullinan vehicles. The brake lights may not be bright enough. As such, these vehicles fail to comply with the requirements of Federal Motor Vehicle Safety Standard (FMVSS) number 108, "Lamps, Reflective Devices, and Associated Equipment."

Consequence:

Without a sufficient level of brightness from the brake lights, the vehicle may have reduced visibility to other drivers when braking, increasing the risk of a crash.

Remedy:

Rolls-Royce Motor Cars will notify owners, and Rolls-Royce Motor Car dealers will update the brake light software, free of charge. The recall is expected to begin October 14, 2019. Owners may contact Rolls-Royce Motor Cars Customer Relations and Services at 1-866-230-4956 or at customer.relations@rolls-roycemotorcarsna.com.

Notes:

Owners may also contact the National Highway Traffic Safety Administration Vehicle Safety Hotline at 1-888-327-4236 (TTY 1-800-424-9153), or go to www.safercar.gov.

We have received Rolls-Royce Motor Cars's proposed owner notification letter and it is currently under review. You will be notified of any concerns or changes once our review is complete.

Please be reminded of the following requirements:

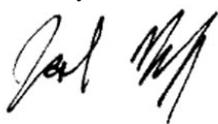
Copies of all notices, bulletins, dealer notifications, and other communications that relate to this recall, including a copy of the final owner notification letter and any subsequent owner follow-up notification letter(s), are required to be submitted to this office no later than 5 days after they are originally sent (if they are sent to more than one manufacturer, distributor, dealer, or purchaser/owner).

Under 49 U.S.C. § 30112(a), it is illegal for anyone, including a manufacturer, distributor, dealer, or retailer to sell an item of equipment or vehicle that fails to comply with all applicable Federal motor vehicle safety standards.

As stated in Part 573.7, submission of the first of six consecutive quarterly status reports is required within one month after the close of the calendar quarter in which notification to purchasers occurs. Therefore, the first quarterly report will be due on, or before, 30 days after the close of the calendar quarter.

Your contact for this recall will be Jennifer Kruger who may be reached by phone at (202) 366-2461, or by email at jennifer.kruger@dot.gov. We look forward to working with you.

Sincerely,



Joshua Neff
Chief, Recall Management Division
Office of Defects Investigations
Enforcement