



VIA E-Mail

October 10, 2008

Mr. David Coleman
National Highway Traffic Safety Administration
1200 New Jersey Avenue, S.E.
West Building
Washington, D.C. 20590

Porsche Cars North America, Inc.

980 Hammond Drive
Suite 1000
Atlanta, Georgia 30328
(770) 290-3500 Fax: (770) 290-3700

Re: Proposed VIN Decipherment for Model Year 2010

Dear Mr. Coleman:

On behalf of Porsche AG and Porsche Cars North America, Inc., we would like to submit the following proposal for Porsche's model year 2010 vehicle identification number (VIN) system.

Enclosed is a table with our proposed decipherment system for the model year 2010. As you can see VIN positions 4 through 8 describe a unique combination of Make, line, series, body type, engine type, restraint devices/locations, and GVWR (if applicable).

We seek your approval for our proposal. We also have an additional concern. In our old VIN system the definitions of each of the VIN positions did not generally change from model year to model year. In the future this may no longer be true. For example, under our proposal for model year 2010 characters "CA2A8" in VIN positions 4 through 8 would define a base Boxster. In model year 2011 these same characters would define a base Boxster, but the vehicle might have a different displacement engine or might have a new restraint design.

We believe this to be permissible in the new rule and seek your confirmation of this.

Should you have any questions, please do not hesitate to contact me at (770) 290-3627.

Sincerely,

Walter J. Lewis, Manager
Regulatory Affairs

Enclosure

PORSCHE

VIN Positions									
1 - 3	Mfg.	Type							
WPO	Porsche	PC							
WP1	Porsche	MPV							
4 - 8	Make	Line	Series	Body Type	Engine	Restraint Types/Locations	GWR		
CA2A8	Porsche	Boxster	Base	Convertible	2.9L flat six	Dual frontal, front row side head and thorax airbags	N/A		
CB2A8	Porsche	Boxster	S	Convertible	3.4L flat six	Dual frontal, front row side head and thorax airbags	N/A		
AA2A8	Porsche	Cayman	Base	Coupe	2.9L flat six	Dual frontal, front row side head and thorax airbags	N/A		
AB2A8	Porsche	Cayman	S	Coupe	3.4L flat six	Dual frontal, front row side head and thorax airbags	N/A		
AA2A9	Porsche	911	Base	Coupe	3.6L flat six	Dual frontal, front row side head and thorax airbags	N/A		
AB2A9	Porsche	911	S	Coupe	3.8L flat six	Dual frontal, front row side head and thorax airbags	N/A		
BA2A9	Porsche	911	Base	Targa	3.6L flat six	Dual frontal, front row side head and thorax airbags	N/A		
BB2A9	Porsche	911	S	Targa	3.8L flat six	Dual frontal, front row side head and thorax airbags	N/A		
CA2A9	Porsche	911	Base	Convertible	3.6L flat six	Dual frontal, front row side head and thorax airbags	N/A		
CB2A9	Porsche	911	S	Convertible	3.8L flat six	Dual frontal, front row side head and thorax airbags	N/A		
AD2A9	Porsche	911	Turbo/GT2	Coupe	3.6L flat six, turbocharged	Dual frontal, front row side head and thorax airbags	N/A		
CD2A9	Porsche	911	Turbo	Convertible	3.6L flat six, turbocharged	Dual frontal, front row side head and thorax airbags	N/A		
AC2A9	Porsche	911	GT3	Coupe	3.8L flat six	Dual frontal, front row side head and thorax airbags	N/A		
AB2A7	Porsche	Panamera	A	Sedan	Base engine	Dual frontal, dual knee bags, front row side head and thorax airbags	N/A		
AC2A7	Porsche	Panamera	B	Sedan	Higher performance engine	Dual frontal, dual knee bags, front row side head and thorax airbags	N/A		
AA2AP	Porsche	Cayenne	Base	SUV	3.6L V6	Dual frontal, front row side, front and rear curtain airbags	Class E		
AB2AP	Porsche	Cayenne	S	SUV	4.8L V8	Dual frontal	Class E		
AD2AP	Porsche	Cayenne	GTS	SUV	4.8L V8	Dual frontal	Class E		
AC2AP	Porsche	Cayenne	Turbo	SUV	4.8L V8, turbocharged	Dual frontal	Class E		
9	Check Digit								
10	Model Year								
A	2010								
11	Plant								
L	Leipzig, Germany								
S	Stuttgart, Germany								
S	Uusikaupunki								
13 - 17	Sequential Production Number								