



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

1200 New Jersey Avenue SE.
Washington, DC 20590

September 21, 2011

[REDACTED]

Flemington, NJ [REDACTED]

Dear [REDACTED]

NVS-216 mec
Ref. # 10386588

Thank you for your correspondence concerning your model year (MY) 2010 Volkswagen Jetta TDI vehicle. Your correspondence was received by the National Highway Traffic Safety Administration's (NHTSA) Office of Defects Investigation (ODI).

NHTSA is the Federal agency responsible for improving safety on our Nation's highways. We are authorized to order manufacturers to recall and repair vehicles or motor vehicle equipment when our investigations indicate that they contain safety defects in their design, construction, or performance. In order for the agency to initiate an investigation, we look carefully at the body of consumer complaints and other available data to determine whether a defect may exist. We cannot act on isolated problems or resolve disputes between individual owners, dealers, or manufacturers.

We appreciate the report you provided. Reports from motorists are a very important source of information for us. In your letter, you indicated you filed a prior complaint in March regarding vehicle stalling. Information submitted by owners is automatically entered into our complaint database. If additional information is required, we may follow up by contacting the vehicle owner. We apologize for any confusion this may have caused you.

On August 26, 2010, NHTSA opened preliminary evaluation No. 10-034, into reports alleging internal failure of the high pressure fuel pumps in MY 2009 and MY 2010 Volkswagen vehicles with TDI engines.. Debris from the pump contaminates the fuel system resulting in a rough engine, loss of power, and possible engine stalling. On February 7, 2011, ODI upgraded that investigation to an engineering analysis No. 11-003, which is a more detailed and complete technical analysis of the character and scope of an alleged defect. This investigation is continuing and no determinations have been made at this time. For your information, we have enclosed a copy of the opening resume for engineering analysis No. 11-003, and a brochure explaining the investigation process that can also be found on our web site at www-odi.nhtsa.dot.gov/recalls/recallprocess.cfm.



Should you encounter a safety-related problem with a motor vehicle or motor vehicle equipment in the future, we would appreciate it if you would complete an electronic Vehicle Owner's Questionnaire online at www.nhtsa.dot.gov/ivoq or call the Auto Safety Hotline at 1-888-327-4236. Also, a summary listing of vehicle owners' complaints, safety recalls, manufacturers' service bulletins, etc., can be obtained at www.nhtsa.dot.gov/cars/problems.

Sincerely,

A handwritten signature in cursive script that reads "Randy Reid".

Randy Reid, Chief
Correspondence Research Division
Office of Defects Investigation
Enforcement

Enclosures



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ODI RESUME

OFFICE OF DEFECTS INVESTIGATION
NHTSA
Authentic US Government Information
National Highway Traffic Safety Administration
uses a digital certificate to ensure
the content has remained unchanged

Investigation: EA 11-003
Prompted by: PE10-034
Date Opened: 02/07/2011
Investigator: Kerrin Bressant
Approver: Frank Borris
Subject: High-Pressure Fuel Pump Failure (HPFP)
Reviewer: Jeff Quandt

MANUFACTURER & PRODUCT INFORMATION

Manufacturer: VOLKSWAGEN OF AMERICA, INC
Products: 2009-2010 Volkswagen/Audi JETTA/Golf/A3 TDI Clean Diesel
Population: 97,272 (Estimated)

Problem Description: HPFP failure causes contamination of the fuel system with debris from pump wear, which results in rough engine, loss of power and possible engine stall.

FAILURE REPORT SUMMARY

	ODI	Manufacturer	Total
Complaints:	52	113	160**
Crashes/Fires:	1	0	1
Injury Incidents:	0	0	0
Fatality Incidents:	0	0	0
Other*:	0	154	154

*Description of Other: HPFP warranty claims related to the alleged defect.

** Count indicates duplicate reports received by ODI and manufacturer.

ACTION / SUMMARY INFORMATION

Action: An Engineering Analysis has been opened.

Summary:

The Office of Defects Investigation (ODI) and Volkswagen (VW) have received a total of 160 complaints and field reports alleging incidents of engine stall and/or loss of power that appear to be related to high pressure fuel pump (HPFP) failures in certain model year (MY) 2009 through 2010 Volkswagen Jetta and MY 2010 Volkswagen Golf and Audi A3 vehicles equipped with TDI clean diesel engines. Approximately half of the reports indicate that the failure resulted in an engine stall incident, with many of these alleging stall incidents at highway speeds in traffic with no restart. There has been one minor crash alleged to have resulted from HPFP failure in the subject vehicles.

In response to ODI's information request for PE10-034, VW indicated that it had "found no defect related to motor vehicle safety with relation to the TDI Clean Diesel fuel system at issue in this investigation" and attributed problems with HPFP failure to operation with gasoline contaminated diesel fuel. Volkswagen stated that "even a small amount of gasoline in the diesel fuel may disrupt the necessary lubrication required and may cause the HPFP to fail." In response to concerns that fuel contamination was the major cause of HPFP and related fuel system failures, VW issued a Technical Service Bulletin in May 2010 (VW TB V011011 2023624 and Audi TB A011008 2023360-1), with instructions to inspect the diesel fuel for vehicles requiring fuel system service that have symptoms associated with HPFP failure. The bulletin states that "fuel system damage incurred by use of fuel not complying to ASTM-D-975 Grade 2 S15 (B5 or less biodiesel content) standards will not be covered under warranty."

Volkswagen also provided information about 121 mis-fueling incidents reportedly acknowledged by consumers or dealers and test results for about 50 diesel fuel samples taken from complaint vehicles in late-August through early-October 2010. The mis-fueling incidents include about 20 reports involving incorrect fueling by dealer sales or service personnel and generally report symptoms such as rough running, stalling and/or no start within a few miles of refueling the vehicle with gasoline. Volkswagen indicated that the testing of fuel samples from complaint vehicles found that

nearly 90 percent contained high amounts of gasoline.

Volkswagen implemented design changes for the HPFP in May 2008, September 2009 and November 2010 to improve the robustness of the pump when used with poor quality fuel. ODI analysis of HPFP failures identified from all sources shows failure rates of 0.53% for MY 2009 vehicles and 0.11% for MY 2010 vehicles.

This investigation has been upgraded to an Engineering Analysis to continue to investigate the issues with mis-fueling and HPFP design identified during the Preliminary Evaluation.