

INFORMATION REDACTED PURSUANT TO THE FREEDOM
OF INFORMATION ACT (FOIA), 5 U.S.C. 552(B)(6)



U.S. Department
of Transportation

National Highway
Traffic Safety
Administration

1200 New Jersey Avenue, SE
Washington, DC 20590

May 31, 2019

[REDACTED]
Cutchogue, NY [REDACTED]

NEF-109 cjb
Ref. No. 11180280

Dear [REDACTED]:

Thank you for your correspondence concerning your model year (MY) 2016 Volkswagen CC vehicle. The National Highway Traffic Safety Administration's (NHTSA) Office of Defects Investigation (ODI) received your correspondence. We regret any inconvenience our delay in responding may have caused you.

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. We also monitor the completion rates and adequacy of manufacturers' recall campaigns.

We appreciate the reports you provided. Reports from motorists are a very important source of information for us. We reviewed our database in an effort to identify whether a safety defect trend exists with regard to a clock spring failure in MY 2016 Volkswagen CC vehicles. At this time, there is insufficient evidence to warrant opening a safety defect investigation or to initiate a recall. The information you provided has been entered into our database. It will be considered with future reports to identify any safety defect trends that may require our attention. For your information, an explanation of NHTSA's investigation and recall process is on our website at: www.nhtsa.gov/sites/nhtsa.dot.gov/files/documents/mvdefectsandrecalls_808795.pdf.

As you know, there have been several service actions to correct a clock spring problem in certain Volkswagen vehicles. On July 30, 2015, NHTSA Safety Recall Campaign 15V-483 was initiated to address clock spring failures in certain MY 2010 through MY 2014 vehicles. However, ODI received reports of clock spring failures after owners received the repair and opened a recall query (RQ)17-009 to analyze the adequacy of the recall remedy. As a result, engineering analysis (EA)18-003 was opened to further review the problem. At this time ODI's investigation is limited to analyzing defective clock springs in MY 2010 through MY 2014.

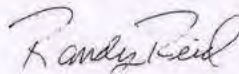
vehicles affected by Recall 15V-483. Furthermore, we do know that your MY 2016 Volkswagen CC was produced with a redesigned clock spring with a flap to keep debris from entering the housing.

In addition, Volkswagen issued a steering wheel clock spring limited warranty extension (VWP-18-11, enclosed) for certain MY 2010 through MY 2018 vehicles affected by Recall 15V-483 or that have experienced the failure, but have not been recalled. Without a repair order, we cannot determine if the clock spring problem you experienced is related to condition described in the extended warranty. Please note that NHTSA has no authority over a manufacturer's limited warranty extension campaign. We recommend that continue to work with Volkswagen and your local dealer to resolve this matter.

We also received your complaint regarding a delay in a Takata air bag recall for your vehicle. We entered your vehicle identification number (VIN) in our VIN Look-Up Tool, and it appears you have since received the repair—there are no open recalls on your vehicle. In any event, we understand your frustration with any delay you may have experienced, and appreciate your diligence in this matter. We suggest that you check NHTSA's website at least twice per year for new safety recalls by entering your VIN into our Look-Up Tool.

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.gov or call the Vehicle Safety Hotline at 888-327-4236. Also, a summary listing of vehicle owners' complaints, safety recalls, manufacturers' service bulletins, etc. can be obtained at our website.

Sincerely,



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

Enclosure



Volkswagen

Warranty Information

Policies and Procedures Bulletin

Number: VWP-18-11

Subject: Steering Wheel Clock Spring Limited Warranty Extension

Date: Oct. 30, 2018

This document modifies the
Volkswagen Warranty Policies
and Procedures Manual.

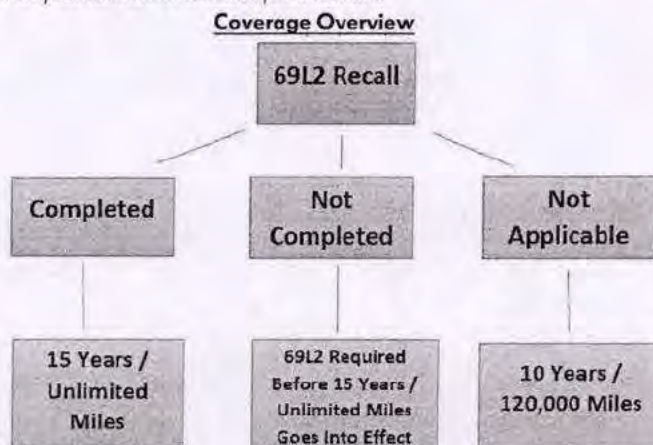
Steering Wheel Clock Spring Limited Warranty Extension

For vehicles applicable to the 69L2 campaign with U37 Warranty Key, Volkswagen is extending warranty coverage for the Steering Wheel Clock Spring in certain 2010-2014 model year Volkswagen vehicles for a time period of 15 years unlimited mileage from the vehicle's original in-service date;

For vehicles not applicable to the 69L2 campaign with U36 Warranty Key, Volkswagen is extending warranty coverage for the Steering Wheel Clock Spring in certain 2010-2018 model year Volkswagen vehicles for a time period of 10 years or 120,000 miles, whichever occurs first, from the vehicle's original in-service date.

The vehicle's original in-service date is defined as the date the vehicle was delivered to either the original purchaser or the original lessee; or if the vehicle was first placed in service as a "demonstrator" or "company" car, on the date such vehicle was first placed in service.

This warranty extension is fully transferrable to subsequent owners.



What is the Problem

Certain vehicles may, over time, develop an issue with the steering wheel clock spring that causes the airbag light to come on. This is due to hair or other fibers that may contaminate the airbag clock spring (a spiral wound, flat cable that keeps the airbag powered while the steering wheel is being turned). This contamination may tear the clock spring and result in a loss of electrical connection to the driver's frontal airbag. A loss of electrical connection to the driver's frontal airbag will prevent the airbag from deploying in the event of a vehicle crash, increasing the risk of injury.



Volkswagen

Warranty Information

Warranty Extension Coverage/Limitations

A torn Steering Wheel Clock Spring demonstrated by either fault code B100001 (Driver airbag igniter: Resistance too high) or VAG00588 (Driver side airbag igniter: Upper limit exceeded) **must** be present in the technician's Guided Fault Findings log for the warranty extension to apply.

As long as your vehicle is within the time and mileage limits of this warranty extension, an authorized Volkswagen dealer will diagnose the following FREE of charge: **Steering wheel controls, including the horn, not working properly and an airbag light that stays on. Both conditions must be present for diagnosis to be covered under this warranty extension.**

- ▶ If diagnosis confirms that the issue is caused by a **torn** steering wheel clock spring, the repair will be performed at no cost to you.
- ▶ If diagnosis reveals that your vehicle has an unrelated issue(s), any necessary repairs will not be covered under this warranty extension. Your dealer will advise you on what the repair cost(s) will be.

A vehicle is not eligible for the extended warranty coverage described in this letter if it has a branded title (including, but not limited to: "Totaled," "Assembled," "Dismantled," "Flood," "Junk," "Rebuilt," "Reconstructed," "Lemon Law Buyback," "Fleet," "Mileage Unknown," "Stolen," or "Salvaged," or if it was acquired by any person or entity from a junkyard, salvage facility, or body shop).

Damage or malfunctions caused by outside influence, such as damage due to an accident, or vehicle misuse or neglect, and repairs that are necessary for proper diagnosis of these conditions or required to bring the vehicle up to factory specifications are not covered by this Warranty Extension.

Vehicle Eligibility

To determine if a vehicle is eligible for the Steering Wheel Clock Spring Limited Warranty Extension, check the VIN in ElsaPro > Vehicle Data. If the warranty extension is applicable to the vehicle, The "Enhanced Coverage" section of the "Vehicle Data" screen in ElsaPro will be populated with the warranty extension parameters.

Saga Warranty Claim Type and Service Number

Dealers must use the following claim type and service number when submitting warranty claims for the Steering Wheel Clock Spring Limited Warranty Extension.

- ▶ Claim type: 110
- ▶ Service number: 6955
- ▶ Damage code: 0015
- ▶ Damage location: None
- ▶ Vendor code: Identified on Steering Wheel Clock Spring

Questions

For any questions regarding this bulletin, please contact the Warranty Helpline at 1-866-306-8447 or warranty.helpline@vw.com.