



U.S. Department
of Transportation

**National Highway
Traffic Safety
Administration**

AUG 1 2003

400 Seventh Street, S.W.
Washington, D.C. 20590

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

William Shapiro, Director
Regulatory and Environmental Affairs
Volvo Cars of North America, LLC
1 Volvo Drive, Building B
Rockleigh, NJ 07647

NVS-212jfa
EA03-008

Dear: Mr. Shapiro

This letter is to advise you that the Office of Defects Investigation (ODI) has completed Preliminary Evaluation (PE03-003) concerning allegations of fuel leaks from the fuel storage tank in 1993 through 1996 Volvo 850 model vehicles. Based on our analysis of the information received, ODI has upgraded this matter into an Engineering Analysis (EA), which has been assigned identification number EA03-008. As part of the investigation, this letter requests clarification of certain data submitted under PE03-003, as well as updated and additional information.

Unless otherwise stated in the text, the following definitions apply to these information requests:

- **Subject vehicles:** all 1993 through 1996 Volvo 850's manufactured for sale or lease in the United States.
- **Volvo:** Volvo Cars of North America, LLC, all of its past and present officers and employees, whether assigned to its principal offices or any of its field or other locations, including all of its divisions, subsidiaries (whether or not incorporated) and affiliated enterprises and all of their headquarters, regional, zone and other offices and their employees, and all agents, contractors, consultants, attorneys and law firms and other persons engaged directly or indirectly (e.g., employee of a consultant) by or under the control of Volvo (including all business units and persons previously referred to), who are or, in or after January 1, 1991, were involved in any way with any of the following related to the alleged defect in the subject vehicles:
 - a. Design, engineering, analysis, modification or production (e.g. quality control);
 - b. Testing, assessment or evaluation;
 - c. Consideration, or recognition of potential or actual defects, reporting, record-keeping and information management, (e.g., complaints, field reports, warranty information, part sales), analysis, claims, or lawsuits; or



DOT AUTO SAFETY HOTLINE
888-DASH-2-DOT
888-327-4236

- d. Communication to, from or intended for zone representatives, fleets, dealers, or other field locations, including but not limited to people who have the capacity to obtain information from dealers.
- **Alleged defect:** shall refer to any breaks, cracks, failures, malfunctions or otherwise unsatisfactory performance of the fuel storage tank and/or related components, e.g., heat shield mounting or attachment points, "fuel pump unit," fuel level sensor, fuel inlet pipe, fuel delivery and return lines, fittings, etc., that result, or may result, in a leak or loss of fuel.
 - **Document:** "Document(s)" is used in the broadest sense of the word and shall mean all original written, printed, typed, recorded, or graphic matter whatsoever, however produced or reproduced, of every kind, nature, and description, and all non-identical copies of both sides thereof, including, but not limited to, papers, letters, memoranda, correspondence, communications, electronic mail (e-mail) messages (existing in hard copy and/or in electronic storage), faxes, mailgrams, telegrams, cables, telex messages, notes, annotations, working papers, drafts, minutes, records, audio and video recordings, data, databases, other information bases, summaries, charts, tables, graphics, other visual displays, photographs, statements, interviews, opinions, reports, newspaper articles, studies, analyses, evaluations, interpretations, contracts, agreements, jottings, agendas, bulletins, notices, announcements, instructions, blueprints, drawings, as-builts, changes, manuals, publications, work schedules, journals, statistical data, desk, portable and computer calendars, appointment books, diaries, travel reports, lists, tabulations, computer printouts, data processing program libraries, data processing inputs and outputs, microfilms, microfiches, statements for services, resolutions, financial statements, governmental records, business records, personnel records, work orders, pleadings, discovery in any form, affidavits, motions, responses to discovery, all transcripts, administrative filings and all mechanical, magnetic, photographic and electronic records or recordings of any kind, including any storage media associated with computers, including, but not limited to, information on hard drives, floppy disks, backup tapes, and zip drives, electronic communications, including but not limited to, the Internet and shall include any drafts or revisions pertaining to any of the foregoing, all other things similar to any of the foregoing, however denominated by Volvo, any other data compilations from which information can be obtained, translated if necessary, into a usable form and any other documents. For purposes of this request, any document which contains any note, comment, addition, deletion, insertion, annotation, or otherwise comprises a non-identical copy of another document shall be treated as a separate document subject to production. In all cases where original and any non-identical copies are not available, "document(s)" also means any identical copies of the original and all non-identical copies thereof. Any document, record, graph, chart, film or photograph originally produced in color must be provided in color. Furnish all documents whether verified by the manufacturer or not. If a document is not in the English language, provide both the original document and an English translation of the document.
 - **Other Terms:** To the extent that they are used in these information requests, the terms "claim," "consumer complaint," "dealer field report," "field report," "fire," "fleet," "good

will," "make," "model," "model year," "notice," "property damage," "property damage claim," "rollover," "type," "warranty," "warranty adjustment," and "warranty claim," whether used in singular or in plural form, have the same meaning as found in 49 CFR 579.4.

In order for my staff to evaluate the alleged defect, certain information is required. Pursuant to 49 U.S.C. § 30166, please provide numbered responses to the following information requests. Insofar as Volvo has previously provided a document to ODI, Volvo may produce it again or identify the document, the document submission to ODI in which it was included and the precise location in that submission where the document is located. When documents are produced, the documents shall be produced in an identified, organized manner that corresponds with the organization of this information request letter (including all individual requests and subparts). When documents are produced and the documents would not, standing alone, be self-explanatory, the production of documents shall be supplemented and accompanied by explanation.

Please repeat the applicable request verbatim above each response. After Volvo's response to each request, identify the source of the information and indicate the last date the information was gathered.

1. As it relates to Volvo's May 2, 2003 response to question number nine of ODI's February 10, 2003 information request in PE03-003, i.e., "other Volvo vehicles," state, by model and model year, the number of other vehicles that Volvo has manufactured for sale or lease in the United States that contain one or more identical components relating to the alleged defect in the subject vehicle. Separately, for each such vehicle manufactured to date by Volvo, state the following:
 - a. Vehicle identification number (VIN);
 - b. Model;
 - c. Model Year;
 - d. Date of manufacture;
 - e. Date warranty coverage commenced;
 - f. The State in the United States where the vehicle was originally sold or leased (or delivered for sale or lease).
 - g. Shared part(s); and
 - h. Periods of application (mm/dd/yyyy) of shared part(s).

Provide the table in Microsoft Access 2000, or a compatible format, entitled "PRODUCTION DATA/OTHER VEHICLES." See Enclosure 1, Data Collection Disc, for a pre-formatted table which provides further details regarding this submission.

2. State the number of each of the following, received by Volvo, or of which Volvo is otherwise aware, which relate to, or may relate to, the alleged defect, in the "other Volvo vehicles" identified in response to question number one above:
 - a. Consumer complaints, including those from fleet operators;

- b. Field reports, including dealer field reports;
- c. Reports involving a crash, injury, or fatality, based on claims against the manufacturer involving a death or injury, notices received by the manufacturer alleging or proving that a death or injury was caused by a possible defect in a subject vehicle, property damage claims, consumer complaints, or field reports;
- d. Reports involving a fire, based on claims against the manufacturer involving a death or injury, notices received by the manufacturer alleging or proving that a death or injury was caused by a possible defect in a subject vehicle, property damage claims, consumer complaints, or field reports;
- e. Property damage claims;
- f. Third-party arbitration proceedings where Volvo is or was a party to the arbitration; and,
- g. Lawsuits, both pending and closed, in which Volvo is or was a defendant or codefendant.

For subparts "a" through "d" state the total number of each item (e.g., consumer complaints, field reports, etc.) separately. Multiple incidents involving the same vehicle are to be counted separately. Multiple reports of the same incident are also to be counted separately (i.e., a consumer complaint and a field report involving the same incident in which a crash occurred are to be counted as a crash report, a field report and a consumer complaint).

In addition, for items "c" through "g" provide a summary description of the alleged problem and causal and contributing factors and Volvo's assessment of the problem, with a summary of the significant underlying facts and evidence. For items "f" and "g," identify the parties to the action, as well as the caption, court, docket number, and date on which the complaint or other document initiating the action was filed.

3. State the number of each of the following, received by Volvo, or of which Volvo is otherwise aware, which relates to, or may relate to, the alleged defect in the subject vehicles that were not previously provided to ODI in its response to ODI's information request letter in PE03-003:
 - a. Consumer complaints, including those from fleet operators;
 - b. Field reports, including dealer field reports;
 - c. Reports involving a crash, injury, or fatality, based on claims against the manufacturer involving a death or injury, notices received by the manufacturer alleging or proving that a death or injury was caused by a possible defect in a subject vehicle, property damage claims, consumer complaints, or field reports;
 - d. Reports involving a fire, based on claims against the manufacturer involving a death or injury, notices received by the manufacturer alleging or proving that a death or injury was caused by a possible defect in a subject vehicle, property damage claims, consumer complaints, or field reports;
 - e. Property damage claims;
 - f. Third-party arbitration proceedings where Volvo is or was a party to the arbitration; and,
 - g. Lawsuits, both pending and closed, in which Volvo is or was a defendant or codefendant.

For subparts "a" through "d" state the total number of each item (e.g., consumer complaints, field reports, etc.) separately. Multiple incidents involving the same vehicle are to be

counted separately. Multiple reports of the same incident are also to be counted separately (i.e., a consumer complaint and a field report involving the same incident in which a crash occurred are to be counted as a crash report, a field report and a consumer complaint).

In addition, for items "c" through "g" provide a summary description of the alleged problem and causal and contributing factors and Volvo's assessment of the problem, with a summary of the significant underlying facts and evidence. For items "f" and "g," identify the parties to the action, as well as the caption, court, docket number, and date on which the complaint or other document initiating the action was filed.

4. Separately, for each item (complaint, report, claim, notice, or matter) within the scope of your response to Request numbers two and three above, state the following information:
 - a. Volvo's file number or other identifier used;
 - b. The category of the item, as identified, (i.e., consumer complaint, field report, etc.);
 - c. Vehicle owner or fleet name (and fleet contact person), address, and telephone number;
 - d. Vehicle's VIN;
 - e. Vehicle's make, model and model year;
 - f. Vehicle's mileage at time of incident;
 - g. Incident date;
 - h. Report or claim date;
 - i. Whether a crash is alleged;
 - j. Whether a fire is alleged;
 - k. Whether property damage is alleged;
 - l. Number of alleged injuries, if any; and
 - m. Number of alleged fatalities, if any.

Provide this information in Microsoft Access 2000, or a compatible format, entitled "REQUEST NUMBER TWO AND THREE DATA." Provide separate tables for the subject vehicles and the "other Volvo vehicles." See Enclosure 1, Data Collection Disc, for a pre-formatted table which provides further details regarding this submission.

5. Produce copies of all documents related to each item within the scope of Request numbers two and three above. Organize the documents separately by model, model year, and category (i.e., consumer complaints, field reports, etc.) and describe the method Volvo used for organizing the documents.
6. State, by model and model year, a total count for all of the following categories of claims, collectively, that have been paid by Volvo to date that relate to, or may relate to, the alleged defect in the subject vehicles that were not previously provided to ODI in its response to PB03-003: warranty claims; extended warranty claims; claims for good will services that were provided; field, zone, or similar adjustments and reimbursements; and warranty claims or repairs made in accordance with a procedure specified in a technical service bulletin or customer satisfaction campaign.

Separately, for each such claim, state the following information:

- a. Volvo's claim number;
- b. Vehicle owner or fleet name (and fleet contact person) and telephone number;
- c. VIN;
- d. Repair date;
- e. Vehicle mileage at time of repair;
- f. Repairing dealer's or facility's name, telephone number, city and state or ZIP code;
- g. Labor operation number;
- h. Problem code;
- i. Replacement part number(s) and description(s);
- j. Concern stated by customer; and
- k. Comments, if any, by dealer/technician relating to claim and/or repair.

Provide this information in Microsoft Access 2000, or a compatible format, entitled "WARRANTY DATA." See Enclosure 1, Data Collection Disc, for a pre-formatted table which provides further details regarding this submission.

7. State, by model and model year, a total count for all of the following categories of claims, collectively, that have been paid by Volvo to date that relate to, or may relate to, the alleged defect, in the "other Volvo vehicles" identified in response to question number one: warranty claims; extended warranty claims; claims for good will services that were provided; field, zone, or similar adjustments and reimbursements; and warranty claims or repairs made in accordance with a procedure specified in a technical service bulletin or customer satisfaction campaign.

Separately, for each such claim, state the following information:

- a. Volvo's claim number;
- b. Vehicle owner or fleet name (and fleet contact person) and telephone number;
- c. VIN;
- d. Repair date;
- e. Vehicle mileage at time of repair;
- f. Repairing dealer's or facility's name, telephone number, city and state or ZIP code;
- g. Labor operation number;
- h. Problem code;
- i. Replacement part number(s) and description(s);
- j. Concern stated by customer; and
- k. Comments, if any, by dealer/technician relating to claim and/or repair.

Provide this information in Microsoft Access 2000, or a compatible format, entitled "WARRANTY DATA FOR OTHER VOLVO VEHICLES. See Enclosure 1, Data Collection Disc, for a pre-formatted table which provides further details regarding this submission.

8. Apart from Federal Motor Vehicle Safety Standard 301; Fuel System Integrity, identify all testing conducted by, or on behalf of Volvo that relate to the alleged defect. Does Volvo plan any other testing, assessments, analyzes, studies, surveys, simulations, investigations, inquiries and/or evaluations (collectively, "actions") that relate to, or may relate to, the alleged defect in the subject vehicles? For each such action that has been undertaken or completed and that is planned, provide the following information:

- a. Action title or identifier;
- b. The actual or planned start date;
- c. The actual or expected end date;
- d. Brief summary of the subject and objective of the action;
- e. Engineering group(s)/supplier(s) responsible for designing and for conducting the action; and,
- f. A brief summary of the findings and/or conclusions resulting from the action.

For each action identified, provide copies of all documents related to the action, regardless of whether the documents are in interim, draft, or final form. Organize the documents chronologically by action.

9. In Volvo's May 2, 2003 response to question number nine, part sales, of ODI's February 10, 2003 information request letter, Volvo failed to state the application, or applications, of the identified parts by model and model years as requested. Additionally, Volvo failed to include "fuel pump unit" sales in its parts sales data submission. Please state whether Volvo sold any fuel pumps that are replacement parts for the subject vehicles. Provide a clear and detailed response to the following question:

State the number of all parts and assemblies related to the alleged defect (including any kits that have been released or developed for use in service repairs) that Volvo has sold for use in the subject vehicles to date by component name, part number (both service and engineering/production), model and model year of the vehicle in which it is used and month/year of sale, including the cut-off date for sales, if applicable.

For each component part number, provide the supplier's name, address, and appropriate point of contact (name, title, and telephone number).

10. Question number ten of ODI's February 10, 2003 information request letter requested information regarding "modifications and changes" to all components, from the start of production to date, which relate to, or may relate to, the alleged defect in the subject vehicles. The table provided in Volvo's May 2, 2003 response is not clear and does not provide all of the requested information. Provide a clear and detailed response to the following question:

Describe all modifications or changes made by, or on behalf of, Volvo in the design, material composition, manufacture, quality control, supply, or installation of all components, from the start of production to date, which relate to, or may relate to, the alleged defect in the subject vehicles. For each such modification or change, provide the following information:

- a. The date (mm/dd/yyyy) or approximate date on which the modification or change was incorporated into vehicle production;
- b. A detailed description of the modification or change;
- c. The reason(s) for the modification or change;
- d. The part numbers (service and engineering) of the original component;
- e. The part number (service and engineering) of the modified component;
- f. Whether the original unmodified component was withdrawn from production and/or sale, and if so, when (mm/dd/yyyy);
- g. When the modified component was made available as a service component (mm/dd/yyyy);
- h. Whether the modified component can be interchanged with earlier production components; and,
- i. Provide definitions of the column headers, e.g., preassembled fuel tank, fuel tank with welded parts, fuel tank, etc. that were included in the table provided in Volvo's May 2, 2003 response.

Also, provide the above information for any modification or change of which Volvo is aware that may be incorporated into vehicle production within the next 120 days.

11. Describe the production processes, material compositions, including properties and specifications, used in the construction of the fuel tanks, including the heat shield mounting points, "fuel pump unit" and gasket, and the fuel sensor and gasket relative to the alleged defect in the subject vehicles.
12. Provide engineering drawings and specifications for all fuel tanks that were or are original equipment or replacement equipment designated by Volvo for use in the subject vehicles. Information in the drawings and specifications should include, but not be limited to, tank capacities, the Volvo or SAE fuel fill reference line, i.e., full tank fill level.
13. Provide engineering drawings and specifications for all fuel tank heat shields that were or are original equipment or replacement equipment designated by Volvo for use in the subject vehicles. Information in the drawings should include all vehicle and fuel tank applications for which they are intended.
14. Provide exploded drawings of the fuel tank, fuel tank heat shields, heat shield attachment hardware, fuel tank to vehicle mounting hardware, and exhaust system in the subject vehicles.
15. Volvo provided six documents, identified by Volvo as technical reports, in its May 2, 2003 response to ODI's February 10, 2003 information request letter that indicate the fuel tanks were leaking from the heat shield mounting points attached to the fuel tank. Two of the reports, 35295 and 102438, identify multiple vehicles. Was there any follow up, or other "actions," to these technical reports? If so, provide copies of all documents relating to each case and provide Volvo's assessment of each of these cases.

16. ODI notes the geographic concentration of reports from hot states in both the consumer reports and warranty data. These states include Florida, Texas, California, Arizona, and Georgia. What is Volvo's assessment as to the concentration of reports from these states?
17. ODI also notes that the 1996 model year makes up 31 percent of the subject vehicle population but accounts for 55 percent of the reports. What is Volvo's assessment of the high number and proportion of reported fuel tank leaks in the 1996 model year vehicles?
18. Three of the consumer complaints provided in Volvo's May 2, 2003 response to ODI's February 10, 2003 information request letter are not readable documents. Provide readable documents for the vehicles identified by the following VIN's: YV1LW5713R202285, YV1LS5511P2037363, and YV1LW5712R202009.
19. Compare and contrast the defect condition addressed by Volvo's recall of certain 1989 through 1991 Volvo 760, 780 and 940 SE model vehicles to correct a defect that caused "fuel seepage" from the top of the fuel tank (Volvo campaign 57, NHTSA recall # 91V-010) with the alleged defect in the subject vehicles. Volvo's response to this request should include all factors that were considered in its defect determination and decision to conduct the recall. Explain in detail why Volvo believes that "fuel seepage" in the recalled vehicles is a safety defect issue and that the fuel leakage in the subject vehicles is not. A copy of Volvo's Defect Report for recall 91V-010 is enclosed for your information.

This letter is being sent to Volvo pursuant to 49 U.S.C. § 30166, which authorizes NHTSA to conduct any investigation that may be necessary to enforce Chapter 301 of Title 49 and to request reports and the production of things. It constitutes a new request for information. Volvo's failure to respond promptly and fully to this letter could subject Volvo to civil penalties pursuant to 49 U.S.C. § 30165 or lead to an action for injunctive relief pursuant to 49 U.S.C. § 30163. (Other remedies and sanctions are available as well.) Please note that maximum civil penalties under 49 U.S.C. § 30165 have increased as a result of the recent enactment of the Transportation Recall Enhancement, Accountability, and Documentation (TREAD) Act, Public Law No. 106-414 (signed November 1, 2000). Section 5(a) of the TREAD Act, codified at 49 U.S.C. § 30165(b), provides for civil penalties of up to \$5,000 per day, with a maximum of \$15 million for a related series of violations, for failing or refusing to perform an act required under 49 U.S.C. § 30166, which includes failing to respond fully to ODI information requests. This letter does not waive potential penalties with respect to Volvo's response to ODI's February 10, 2003 information request letter.

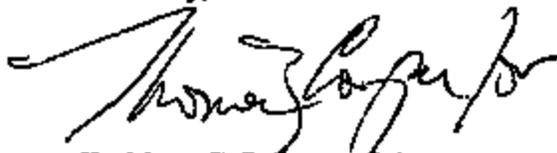
If Volvo cannot respond to any specific request or subpart(s) thereof, please state the reason why it is unable to do so. If on the basis of attorney-client, attorney work product, or other privilege, Volvo does not submit one or more requested documents or items of information in response to this information request, Volvo must provide a privilege log identifying each document or item withheld, and stating the date, subject or title, the name and position of the person(s) from, and the person(s) to whom it was sent, and the name and position of any other recipient (to include all carbon copies or blind carbon copies), the nature of that information or material, and the basis for the claim of privilege and why that privilege applies.

Volvo's response to this letter, in duplicate, together with a copy of any confidentiality request, must be submitted to this office by September 18, 2003. Please refer to EA03-008 in Volvo's response to this letter. If Volvo finds that it is unable to provide all of the information requested within the time allotted, Volvo must request an extension from Mr. Thomas Z. Cooper at (202) 366-5218 no later than five business days before the response due date. If Volvo is unable to provide all of the information requested by the original deadline, it must submit a partial response by the original deadline with whatever information Volvo then has available, even if an extension has been granted.

If Volvo claims that any of the information or documents provided in response to this information request constitute confidential commercial material within the meaning of 5 U.S.C. § 552(b)(4), or are protected from disclosure pursuant to 18 U.S.C. § 1905, Volvo must submit supporting information together with the materials that are the subject of the confidentiality request, in accordance with 49 CFR Part 512, to the Office of Chief Counsel (NCC-110), National Highway Traffic Safety Administration, Room 5219, 400 Seventh Street, S.W., Washington, D.C. 20590. Volvo is required to submit two copies of the documents containing allegedly confidential information (except only one copy of blueprints) and one copy of the documents from which information claimed to be confidential has been deleted.

If you have any technical questions concerning this matter, please call Mr. John Abbott of my staff at (202) 366-5221.

Sincerely,



Kathleen C. DeMeter, Director
Office of Defects Investigation
Enforcement

Enclosure 1, one CD ROM titled Data Collection Disc containing three files

RECEIVED

VOLVO

PSI JAN -8 11 5:4
Volvo Cars of North America
A Division of Volvo North America Corporation

Rockleigh, New Jersey 07847
Telephone: 201-768-7300
Telex: 6869608

January 4, 1991

Mr. Michael Brownlee
Acting Associate Administrator for Enforcement
National Highway Traffic Safety Administration
400 Seventh Street, S.W.
Washington, D.C. 20590

91V-010 (01)

Re: Defect Information Report

Dear Mr. Brownlee:

Volvo has determined that a defect exists in the sealing of the fuel tank sending unit on certain 1989-1991 model year Volvo passenger cars, equipped with an 80 liter fuel tank.

In accordance with Section 573 of 49 CFR, we herein submit a Defect Information Report.

1. Vehicle Manufacturer

Volvo Car Corporation
Gothenburg, Sweden

Designated Agent

Volvo North America Corporation
Rockleigh, New Jersey

2. Identification of Vehicles Involved

The vehicles are 1989-1991 model year Volvo 760 and 940 series four door sedans, and 780/Coupe series two door sedans, equipped with an 80 liter fuel tank. The exact model and year cars are indicated by an "X" in the following chart:

| | 760 SEDAN | 940 SEDAN | 780 | COUPE |
|--------|-----------|-----------|-----|-------|
| MY '89 | X | | X | |
| MY '90 | X | | X | |
| MY '91 | | X | | X |

These vehicles were assembled in plant O, Kalmar, Sweden, and Plant D, Bertone, Italy. The chassis numbers are in the following ranges:

| | | | |
|-----|--------|---|--------|
| 764 | 058500 | - | 089877 |
| 944 | 000001 | - | 006827 |
| 782 | 006500 | - | 011743 |

3. Number of Vehicles Potentially Affected

It is estimated that a total of 19,286 vehicles sold in the U.S. are potentially affected.

4. Estimated Percentage of Vehicles which Contain the Defect

The corrective action will be performed on all potentially affected vehicles, as the percentage containing the defect is unknown.

5. Description of the Defect

It was found that if the three conditions of high ambient temperatures, overfilling of the fuel tank, and insufficient torque on the sending unit lock ring existed simultaneously, seepage of fuel may occur from the top of the tank.

6. Chronology of Events

September to
November 1990

- Volvo received reports of fuel tank seepage from vehicles in Japan. Volvo began a technical investigation of vehicles.

January 1991

- Defect determination

7. Corrective Action

All potentially affected vehicles will be recalled and inspected for signs of seepage. If no seepage is found, the sending unit lock ring will be retorqued. If seepage is found, the lock ring gasket will be replaced. All vehicles will also be fitted with an additional clamp around the lock ring.

8. Copies of Notices, Bulletins, Etc.

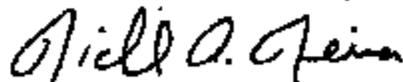
Formal dealer and owner notifications and bulletins have not yet been completed. Copies of all such information will be forwarded to you as soon as they are available.

We are proceeding to implement this corrective action for all affected vehicles as soon as possible. We will notify you of our owner notification schedule and forward copies of all recall materials as soon as they are available.

Should you have any questions, please have your staff contact me at 201-767-4815.

Very truly yours,

VOLVO CARS OF NORTH AMERICA
Product and Technical Support



Richard A. Reina
Compliance Programs Administrator
Regulations and Compliance

RAR:mc

VOLVO

Volvo Cars of North America
A Division of Volvo North America Corporation

Rockleigh, New Jersey 07847
Telephone: 201-766-7300
Telex: 135457

Dear Volvo Owner:

This notice is being sent to you in accordance with the requirements of the National Traffic and Motor Vehicle Safety Act. Volvo Cars of North America has determined that a defect which relates to motor vehicle safety exists in certain 1989 through 1991 Volvo automobiles.

The vehicles in question are 760 sedans, 940SE sedans, and 780 coupes which are equipped with a 21 gallon (80 liter) fuel tank. We are concerned that there may be seepage from the top of the fuel tank if certain conditions occur simultaneously. On some cars, the lock ring on the fuel tank sending unit may not be tightened sufficiently. This condition, along with high ambient temperatures and overfilling the fuel tank, could result in seepage of fuel.

We would like to inspect your fuel tank for signs of seepage. If no seepage is found, the sending unit lock ring will be retightened and fitted with an additional locking clamp. This procedure will take about 40 minutes. If evidence of seepage is found, the sending unit will be fitted with a new sealing gasket. The lock ring will then be retightened and fitted with an additional locking clamp. This process will take approximately one hour. In a few cases the fuel tank may need to be replaced, which will take two and one half hours. Whichever repair is necessary will be done at no charge to you.

Please contact your Volvo dealer at your earliest convenience to arrange for an appointment. Present the enclosed "Vehicle Campaign Notice" to your dealer at the time of service. The dealer will complete the necessary work and will fill out the form. After you have signed the notice, your dealer will return it to us to verify that the repair has been completed. In the meantime, avoid overfilling the tank when purchasing fuel to minimize the possibility of seepage.

We have advised the National Highway Traffic Safety Administration that we are conducting this recall. If you are unable to have your vehicle remedied without charge and within a reasonable time, you may contact the NHTSA Administrator at 1 800 424-9393. The phone number within the District of Columbia is 202 366-0123. Their address is 400 Seventh Street SW, Washington, DC 20590.

All authorized Volvo dealers are ready to serve you now. If you have any questions about the recall, speak with your Volvo dealer. He is in the best position to help you. If you need further information, you may contact Volvo Consumer Affairs, P.O. Box 914, Rockleigh, NJ 07647. Our telephone number is 1-800 458-1552 or 201 767-4797 (8:00 a.m. to 7:00 p.m. Eastern Standard Time).