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OFFICE OF DEFECTS
INVESTIGATION

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October 8, 2004

Kathleen C. DeMeter, Director
Office of Defects Investigation
US Department of Transportation
National Highway Traffic Safety Administration
400 Seventh Street, S.W.
Washington, DC 20590

Subject: EA04-017: Throttle fails to return to idle

Dear Ms. DeMeter,

Attached is our response to your letter dated August 26, 2004 requesting additional information concerning certain 1996-2000 model year Audi A4, Audi A6, and Volkswagen Passat vehicles.

For your convenience, each request is restated verbatim and then followed by our response.

Please contact me if you have any questions regarding this response.

Regards,

John Maddox
TREAD/Product Compliance Officer
Volkswagen of America

Attachments:

On behalf of Volkswagen AG (VWAG), the following is Volkswagen of America's (VWoA's) response to this inquiry.

Based on phone conversations on September 13, 2004 and October 4, 2004 with Mr. Jeff Quandt of your staff, Volkswagen is providing data for questions one through six and eight of this inquiry regarding NY 1996-2000 Audi A4, Audi A6, and VW Passat vehicles equipped with the subject 2.8L V6 engines. Volkswagen is providing data for the remaining questions for 1998-1999 Audi A4, Audi A6 and VW Passat vehicles with the subject 2.8L V6 engines.

Request 1.

State, by model, engine, and model year, the number of subject vehicles Volkswagen has manufactured for sale or lease in the United States. Separately, for each subject vehicle manufactured to date by Volkswagen, state the following:

- Vehicle identification number (VIN);
- Make;
- Model;
- Engine;
- Model Year;
- Date of manufacture;
- Date warranty coverage commenced; and
- The State in the United States where the vehicle was originally sold or leased (or delivered for sale or lease).

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

Response 1.

Vehicle Population 1996-2000 Audi A4, A6, & VW Passat *

| Model | Engine | Model Year | | | | |
|--------|---------|------------|-------|---------------------|--------|--------|
| | | 1996 | 1997 | 1998 | 1999 | 2000 |
| Passat | 2.8L V6 | 11,081 | 9,178 | 3,225 | 26,872 | 31,982 |
| A4 | 2.8L V6 | 15,446 | 8,058 | 18,441 | 14,749 | 5,713 |
| A6 | 2.8L V6 | 9,293 | 7,738 | 1,751** 15,200** | 24,807 | 12,589 |

- 1996-1997 Passat 2.8L V-6 vehicles were equipped with an entirely different VR-6 engine (cylinder angle 16°, one cylinder head) of 2792cc generating 172 horsepower.
- 1996-1997 Audi A4 and 1996-1999 "C4 platform" A6 were equipped with a 2771cc V6 engine generating 172 horsepower (cylinder angle 90°, two cylinder heads, two valves and two throttle plates).
- 1998-1999 Audi A4 and VW Passat were equipped with a 2771cc V6 engine generating 180 horsepower (cylinder angle 90°, two cylinder heads, five valves and single throttle plate).
- 1998-1999 Audi A6 was equipped with a 2771cc V6 engine generating 200 horsepower (cylinder angle 90°, two cylinder heads, five valves and single throttle plate).
- 2000 Audi A4 and VW Passat were equipped with a 2771cc V6 engine generating 180 horsepower (cylinder angle 90°, two cylinder heads, five valves, single throttle plate, e-gas).
- 2000 Audi A6 was equipped with a 2771cc V6 engine generating 200 horsepower (cylinder angle 90°, two cylinder heads, five valves, single throttle plate, e-gas).

**Due to the expanded model year scope of EA04-017 from PE04-023, the number of 1998 A6 2.8L V6 subject vehicles has increased from 15,200 C6 platform vehicles, as noted in the PE, to 16,951, due to the inclusion 1751 older C4 platform vehicles which were also sold in MY 1998.

Our responses to subparagraphs a. through h. are provided in a Microsoft Access table entitled "PRODUCTION DATA.mdb" attached hereto as Exhibit to Request 1. Selling state information is not available for some 1996-1997 Passat vehicles.

Source: Business Objects Vehicles Universe. Date Gathered: Through 8/28/2004

Exhibit to Request 1

PRODUCTION DATA

Data is provided in Microsoft Access format on EA04-017 Data Collection Disc

Request 2.

State the number of each of the following, received by Volkswagen, or of which Volkswagen are otherwise aware, which relate to, or may relate to, the alleged defect in the subject vehicles:

- 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; and
- f. Third-party arbitration proceedings where Volkswagen is or was a party to the arbitration; and
- g. Lawsuits, both pending and closed, in which Volkswagen is or was a defendant or codefendant.

For subparts "a" through "d, / e," 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 "d/e/f/g," provide a summary description of the alleged problem and causal and contributing factors and Volkswagen'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.

Response 2.

- a. In response to your inquiry, Volkswagen has identified 15 additional consumer complaints, involving 13 unique vehicles, none of which are from fleet operators, which may relate to throttle not returning to idle due to icing or freezing in low ambient temperature driving conditions (the alleged defect) in the subject vehicles. Volkswagen has also identified two complaints which are duplicative of vehicles identified in NHTSA's VOQs. Volkswagen is also providing copies of complaints in which the allegations are not clearly specified and Volkswagen is unable to determine if they may or may not be related to the alleged defect.
- b. In response to your inquiry, Volkswagen has identified 13 additional field reports, which may relate to the alleged defect in the subject vehicles. Of these field reports, one is duplicative of a consumer complaint. Volkswagen is also providing copies of field reports in which the allegations are not clearly specified and Volkswagen is unable to determine if they may or may not be related to the alleged defect.
- c. In response to your inquiry, Volkswagen has not identified any reports alleging an accident, 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. In response to your inquiry, Volkswagen has not identified any reports alleging a "fire", based on NHTSA's definition of "fire" in 49 CFR 579.4, based on claims against the manufacturer involving 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. In response to your inquiry, Volkswagen has not identified any property damage claims related to the alleged defect.

- e. In response to your inquiry, Volkswagen has not identified any third-party arbitration proceedings related to the alleged defect.
- f. In response to your inquiry, Volkswagen has not identified any lawsuits related to the alleged defect.

Source: VWoA LISTEN, VWoA TAGS, VWoA FRED, VWoA Product Liaison
 Date Gathered: Through 8/28/2004

Request 3.

Separately, for each item (complaint, report, claim, notice, or matter) within the scope of your response to Request No. 2, state the following information:

- a. Volkswagen's file number or other identifier used;
- b. The category of the item, as identified in Request No. 2 (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 property damage is alleged;
- k. Number of alleged injuries, if any; and
- l. Number of alleged fatalities, if any.

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

Response 3.

Our responses to subparagraphs a. through l. are provided in a Microsoft Excel table entitled "REQUEST NUMBER TWO DATA.xls" attached hereto as Exhibit to Request 3.

Source, Date Gathered: See Response Two

Exhibit to Request 3

REQUEST NUMBER TWO DATA

Data is provided in Microsoft Excel format on EA04-017 Data Collection Disc

Request 4.

Produce copies of all documents related to each item within the scope of Request No. 2. Organize the documents separately by category (i.e., consumer complaints, field reports, etc.) and describe the method Volkswagen used for organizing the documents. Also, provide dealer copies of the full service histories of each vehicle identified in the enclosed complaints and in the vehicles identified in Volkswagen's information responsive the Request No. 2.

Response 4.

In response to your inquiry, Volkswagen is providing copies of documents identified for each item in Response 2. These documents are organized in the following manner:

Within the **"REQUEST NUMBER FOUR DATA"** folder on the EA04-017 Data Collection Disc, there are subfolders containing copies of all documents related to each item within the scope of Request Number Two. The **"CONSUMER COMPLAINTS"** subfolder contains a VIN and customer name entitled Adobe Acrobat File containing the CR case, associated VOQ (if applicable) and service history for each respective alleged complaint. The **"FIELD REPORTS"** subfolder contains an Adobe Acrobat document listing all reports which may relate to the alleged defect in the subject vehicles. Additionally, this folder contains another Adobe Acrobat file that includes a compilation of all the service histories for each unique vehicle identified in a relevant field report. The **"VOQ SERVICE HISTORY"** folder contains a service history for each vehicle uniquely identified in a VOQ.

Volkswagen has created an additional subfolder for the non-specific reports in the **"REQUEST NUMBER FOUR DATA"** folder on the EA04-017 Data Collection Disc. This folder contains two subfolders for non-specific Customer Complaints and non-specific Field Reports.

Our response is provided in Adobe Acrobat format in subfolders of the **"REQUEST NUMBER FOUR DATA"** folder attached hereto as Exhibit to Request 4.

Source, Data Gathered: See Response Number Two

Exhibit to Request 4

REQUEST NUMBER FOUR DATA

**Data is provided in Adobe Acrobat format in the REQUEST NUMBER FOUR folder on
EAD4-017 Data Collection Disc**

Request 5.

State, by model, engine, and model year, a total count for all of the following categories of claims, collectively, that have been paid by Volkswagen to date that relate to, or may relate to, the alleged defect in the subject vehicles: 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. Volkswagen'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. Comment, 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 that provides further details regarding this submission.

Response 5.

In response to your inquiry, Volkswagen has identified 3 additional warranty claims involving 3 unique vehicles, which may relate to the alleged defect in the subject vehicles. The breakdown of these claims by specific model is shown in the table below.

Number of Warranty Claims 1996-2000 Audi A4, A6, & VW Passat

| Model | Engine | Model Year | | | | |
|--------|---------|------------|------|------|------|------|
| | | 1996 | 1997 | 1998 | 1999 | 2000 |
| Passat | 2.8L V6 | 0 | 0 | 0 | 0 | 0 |
| A4 | 2.8L V6 | 0 | 0 | 0 | 2 | 0 |
| A6 | 2.8L V6 | 0 | 0 | 0 | 1 | 0 |

Our responses to subparagraphs a. through k. are provided in a Microsoft Excel table entitled "WARRANTY DATA.xls" attached hereto as Exhibit to Request 5.

Volkswagen is also providing copies of warranty claims in which the reason for the claim does not contain sufficient information for Volkswagen to determine if they may or may not be related to the alleged defect. Information on these claims is provided in a Microsoft Excel table entitled "NON-SPECIFIC WARRANTY DATA.xls" attached hereto as Exhibit to Request 5.

Source: Business Objects Warranty Universe
Data Gathered: Through 8/28/2004

Exhibit to Request 5

**WARRANTY DATA
&
NON-SPECIFIC WARRANTY DATA**

Data is provided in Microsoft Excel format on EA04-017 Data Collection Disc

Request 8.

Describe in detail the search criteria used by Volkswagen to identify the claims identified in response to Request No. 5, including the labor operations, problem codes, part numbers and any other pertinent parameters used. Provide a list of all labor operations, labor operation descriptions, problem codes, and problem code descriptions applicable to the alleged defect in the subject vehicles. State, by make and model year, the terms of the new vehicle warranty coverage offered by Volkswagen on the subject vehicles (i.e., the number of months and mileage for which coverage is provided and the vehicle systems that are covered). Describe any extended warranty coverage option(s) that Volkswagen offered for the subject vehicles and state by option, model, and model year, the number of vehicles that are covered under each such extended warranty.

Response &

In response to your inquiry, the following search criteria was used to identify the claims in response 5:

All 1998- 2000 Volkswagen Passat vehicles equipped with the 2.8L 2771cc (90° cylinder angle, two cylinder heads) V8 engine (excludes 1998-1997 Volkswagen Passat vehicles equipped with an entirely different 2792cc VR-6 engine (15° cylinder angle, one cylinder head)).

All 1996-2000 Audi A4 and A6 vehicles equipped with the 2.8L 2771cc V6 engine.

| Keywords: | Part Group Numbers and Descriptions: | Damage Code: |
|---|---|--------------------------------|
| stuck* stick* throttle*, throttle* throttle* thrtl* waler* condens* mole* idle* freez* froz* bind* surge*, sarge* accel* | A N D 1050 : Crankcase Breather 1053 : Heater Pipe for Crankcase Breather Housing 2978 : Pedal Value Sender 2080 : Accelerator Pedal 2082 : Throttle Cable for Manual Gearbox 2084 : Throttle Cable for Automatic Gearbox 2402 : Fuel Consumption 2404 : Idling Speed 2425 : Air Cleaner 2433 : Solenoid Valve 2434 : Throttle Valve Control Part 2438 : Air Hose 2440 : Injector 2441 : Fuel Distributor 2442 : Throttle Valve Housing 2445 : Air Mass Meter 2447 : Intake Pipe 2453 : Altitude Sender 2458 : Pressure Regulator 2462 : Temperature Sensor 2483 : Vacuum Hoses 2488 : Intake Air Temperature Sensor | O R 17 : Binding |

* = any character or series of characters (wildcard)

Note: Each claim returned from the initial query was reviewed for relevancy to the alleged defect based on all of the information provided in the claim.

Source: VVfA Product Compliance
Date Gathered: Through 8/26/2004

Request 7.

Produce copies of all service, warranty, and other documents that relate to, or may relate to, the alleged defect in the subject vehicles, that Volkswagen has issued to any dealers, regional or zone offices, field offices, fleet purchasers, or other entities. This includes, but is not limited to, bulletins, advisories, informational documents, training documents, or other documents or communications, with the exception of standard shop manuals. Also include the latest draft copy of any communication that Volkswagen is planning to issue within the next 120 days.

Response 7.

In response to your inquiry, Volkswagen has not identified any service or warranty documents that relate or may relate to the alleged defect in the subject vehicles.

Source: VWoA Product Support, AESIS, VESIS
Data Gathered: Through 8/28/2004

Request 8.

Describe all assessments, analyses, tests, test results, studies, surveys, simulations, investigations, inquiries and/or evaluations (collectively, "actions") that relate to, or may relate to, the alleged defect in the subject vehicles that have been conducted, are being conducted, are planned, or are being planned by, or for, Volkswagen. For each such action, 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.

Response 8.

Based on a phone conversation on October 4, 2004 with Mr. Jeff Quandt of your staff, Volkswagen is providing a brief summary of the actions and outcomes since the submission of the PE Response.

Volkswagen has contacted and surveyed customers. This information is provided in response to Request 11.

Additionally, Volkswagen has conducted testing to determine factors that may influence the alleged defect in the subject vehicles. This testing included influences of seasonal effects on water content in engine oil, effect on the amount of water in engine oil due to the age of oil, influence of carbon build up on the throttle plate, influences of aging throttle body components, influences of idle stabilizer or cruise control systems. Volkswagen was not able to determine an influence on the alleged defect due to outcome of any of these tests. Volkswagen was able to identify a potential influence related to the alleged defect from the presence of water in the engine oil during cold ambient temperatures as well as the influence of incorrectly positioned floor mats.

Source: VWoA Product Compliance
Data Gathered: Through 8/28/2004

Request 9.

Describe all modifications or changes made by, or on behalf of, Volkswagen in the design, material composition, manufacture, quality control, supply, or installation of the subject 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 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;
- g. When the modified component was made available as a service component; and
- h. Whether the modified component can be interchanged with earlier production components.

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

Response 9.

Volkswagen has not identified any modifications or changes made by, or on behalf of, Volkswagen AG in the design, material composition, manufacture, quality control, supply, or installation of the subject components related to the alleged defect in 1996-1999 Audi A4, Audi A6 and VW Passat vehicles with the subject 2.8L V6 engines, excluding the service campaign described in response 10.

Volkswagen has identified differences between the 1996-1999 A6 vehicles, and the remaining subject vehicles.

Specifically, Volkswagen notes that the 1996-1997 and early 1998 "C4" A6 vehicles were built on an entirely different vehicle platform than the 1998 "C5" vehicles. These vehicles use a lower output 2.8L 2-valve engine, a completely different powertrain calibration and throttle housing (two throttle plate design). The two throttle plate design results in a greater throttle opening at highway cruising speed, which does not allow to built ice between the throttle plate and throttle housing. Based on the smaller diameter of the throttle plates, the closing force between the throttle plate and the housing is significantly higher.

1996-1997 Audi A4 was equipped with the same 2771cc V6 engine as the 1996-1997 "C4" A6, generating 172 horsepower (cylinder angle 90°, two cylinder heads, two valves and two throttle plates).

1996-1997 Passat 2.8L V-6 vehicles were equipped with an entirely different VR-6 engine (cylinder angle 15°, one cylinder head) of 2792cc generating 172 horsepower

The 1996-1999 VW Passat and Audi A4 vehicles use unique air intake components and have a smaller engine compartment than the 1996-1999 Audi A6 vehicles.

All 2000 MY A6, A4, and Passat vehicles are equipped with an electronic throttle ("e-gas" throttle system), which includes a fail-safe mode that would limit engine torque output in the event of a throttle plate "sticking" for any reason. The crankcase ventilation system is also significantly different to the engines of MY 1996-1999.

Source: AUDI AG

Date Gathered: Through 8/28/2004

Request 10.

In a letter dated May 11, 1999, Volkswagen notified NHTSA of a defect that could result in insufficient brake assist in approximately 12,500 MY 1997 through 1999 Audi A4 and Volkswagen Passat vehicles operated in the states of Alaska, Colorado, Connecticut, Illinois, Iowa, Maine, Michigan, Montana, Minnesota, Nebraska, New Hampshire, New York, North Dakota, South Dakota, Vermont, Wisconsin, and Wyoming (Recall 99V-131). According to Volkswagen, a control valve in the vacuum hose connecting the brake booster to the intake manifold may not open or close fully at temperatures below -4° F under certain driving conditions, resulting in insufficient vacuum supply to the booster. A subsequent letter dated September 3, 1999, amended the scope of the recall to include approximately 33,000 additional MY 1997 through 1999 Audi A4 and A6 and Volkswagen Passat vehicles equipped with 2.8L V6 engines and registered in the same set of states. Provide the following information concerning Recall 99V-131:

- a. Provide copies of all technical reports and presentations that summarize the problem addressed by 99V-131;
- b. State, by model, engine, and model year, the number of recalled vehicles Volkswagen has repaired under 99V-131;
- c. State the numbers of incidents associated with the alleged defect that occurred: (1) in vehicles prior to completion of 99V-131 repairs; and (2) in vehicles after completion of 99V-131 repairs;
- d. State the completion dates for 99V-131 repairs for all vehicles that have been involved in incidents of the alleged defect condition;
- e. Provide Volkswagen's assessment of the relationship between the condition addressed by 99V-131 and the alleged defect in the subject vehicles; and
- f. Provide Volkswagen's assessment of the effect of the repairs conducted under 99V-131 on the alleged defect in the subject vehicles. Include in the assessment the effects from proper repairs and the potential effects from improper repairs.

Response 10.

- a. In response to your inquiry, VWoA has not identified any technical reports that summarize the condition addressed by 99V-131.
- b. In recall 99V-131, VWoA conducted a safety recall for vehicles in cold weather states. VWoA also implemented a customer notification in warm weather states, and for the sake of administrative convenience, used the same campaign code for both actions. The following table states the number of recalled vehicles by model, engine, and model year respectively in both cold and warm regions.

| 99V-131 Repairs Table By Engine, Model and Model Year | | | |
|---|--------|-------|--------|
| Model Year | Model | 1.8L | 2.8L |
| 1997 | Passat | - | - |
| | A4 | 4,782 | 84 |
| | A6 | - | - |
| 1998 | Passat | 2,730 | 11,133 |
| | A4 | 3,977 | 18,266 |
| | A6 | - | 14,813 |
| 1999 | Passat | 7,902 | 20,171 |
| | A4 | 3,916 | 5,304 |
| | A6 | - | 12,767 |

- c. In response to your inquiry, Volkswagen has identified one case that may relate to the alleged defect occurring in a vehicle prior to the completion of 99V-131 repairs, and 18 cases that may relate to the alleged defect occurring after the completion of 99V-131 repairs. In the remaining 15 alleged cases included in this response, the 99V-131 recall

- was not applicable to the subject vehicles. One vehicle has not had the 98V-131 campaign performed.
- d. In response to your inquiry, Volkswagen has provided these figures on the EA04-017 Data Collection Disc entitled "REQUEST NUMBER 10 DATA.xls" attached hereto as Exhibit to Request 10, regarding the incidents reported in response 2 and response 5.
 - e. VW does not believe that the performance of the 98V-131 recall has any effect on the occurrence of alleged defect in the subject vehicles. However, if the KU-Recall is not performed and throttle icing would occur, the brake performance may be reduced.
 - f. See above.

Source: VWoA Focus System
Data Gathered: Through 8/28/2004

Exhibit to Request 10

REQUEST NUMBER 10 DATA

Data is provided in Microsoft Excel format on EA04-017 Data Collection Disc

Request 11.

In a June 23, 2004 meeting with NHTSA staff, representatives from Volkswagen presented information regarding its analysis of the alleged defect. During the meeting, Volkswagen indicated that only a few vehicle inspections and owner interviews had been conducted concerning the alleged defect. Provide the following information concerning Volkswagen's analysis, owner interviews, and vehicle inspections:

- a. Copies of all material presented or displayed at the June 23, 2004 meeting;
- b. A detailed description and chronology of all subsequent efforts to interview owners and inspect incident vehicles; and
- c. Detailed summaries of all owner interviews and vehicle inspections.

Response 11.

- a. In response to your inquiry, Volkswagen has provided these documents on the EA04-017 Data Collection Disc in Adobe Acrobat format entitled "**REQUEST NUMBER 11 DATA – JUNE 2003 PRESENTATION.pdf**" The file is attached hereto as Exhibit to Request 11.
- b. VW has described the chronology of efforts to interview owners in "**RESPONSE NUMBER 11 DATA – INTERVIEW CHRONOLOGY.xls**" The file is attached hereto as Exhibit to Request 11.
- c. Based on a phone conversation on October 4, 2004 with Mr. Jeff Quandt of your staff, Volkswagen is providing the following summary statement regarding the outcome of these interviews: The customer interviews indicated that the alleged defect only occurs at extremely low temperatures and also confirmed the lack of accidents or injuries related to the alleged defect. The vehicle inspections were generally non-conclusive and some indicated that non-original or unsecured floor mats may contribute to the allegations.

Source: VW's Product Compliance
Data Gathered: Through 8/28/2004

Exhibit to Request 11

REQUEST NUMBER 11 DATA – JUNE 2003 PRESENTATION

&

REQUEST NUMBER 11 DATA – INTERVIEW CHRONOLOGY

Data is provided in Adobe Acrobat and Microsoft Excel format on EA04-017 Data Collection Disc

Request 12.

State the number of subject components that Volkswagen has sold that may be used in the subject vehicles 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). Also identify by make, model and model year, any other vehicles of which Volkswagen is aware that contain the identical component, whether installed in production or in service, and state the applicable dates of production or service usage.

Response 12.

Based on a phone conversation on October 4, 2004 with Mr. Jeff Quandt of your staff, this information is no longer required for this response.

Request 13.

Provide a schematic and description showing all aspects of the design of the subject components that relate to the control/prevention of throttle icing. Provide Volkswagen's assessment of the environmental and operating conditions that can produce throttle icing in the subject vehicles when subject components are functioning properly. Provide Volkswagen's assessment of factors that affect throttle ice prevention functionality as a vehicle accumulates time/miles in service.

Response 13.

Based on a phone conversation on October 4, 2004 with Mr. Jeff Quandt of your staff, the schematic is no longer required for this response.

Volkswagen notes that the majority of the reports have occurred in the northeastern areas of the United States where, due to climactic conditions and the use of salt for melting snow, wet/slushy winter driving conditions increase the likelihood of moisture in the intake air. VW also notes that theoretically, drivers could experience a shorter distance per trip as compared to drivers in the western United States.

Volkswagen is not able to identify any factors that affect throttle ice prevention functionality as a vehicle accumulates time/miles in service.

Source: VWAG
Date Gathered: 10/7/2004

Request 14.

Furnish Volkswagen's assessment of the alleged defect in the subject vehicle, including:

- a. The causal or contributory factor(s);
- b. The failure mechanism(s);
- c. The failure mode(s);
- d. The risk to motor vehicle safety that it poses;
- e. What warnings, if any, the operator and the other persons both inside and outside the vehicle would have that the alleged defect was occurring or subject components was malfunctioning; and
- f. The reports included with this inquiry.

Response 14.

Volkswagen has not been able to produce throttle icing in laboratory conditions at any temperature above 3°F.

Volkswagen notes that the subject condition does not result in a loss of vehicle control, and this is demonstrated by the lack of accidents, injuries, or fatalities.

However, in an abundance of caution, Volkswagen is submitting this response to NHTSA in conjunction with a "573" Report to announce a safety recall for 1998-1999 "C5" A6 vehicles with 2.8L engines and automatic transmissions in "cold" climates.

Volkswagen will also conduct a service action to offer the same repair free-of-charge upon request of owners of 1998-1999 "C5" A6 vehicles with 2.8L engines vehicles registered in "warm" states. This will include a customer notification letter.

Volkswagen notes that the 1998-1999 "C5" A6 vehicles with 2.8L engines vehicles included in the Recall and Service Action represent a significantly different occurrence rate than the other subject vehicles.

Volkswagen notes that there are many design differences between the 1998-1999 A6 vehicles, and the remaining subject vehicles as Audi A4, A6 and VW Passat MY 1996-1997 and Audi A4, A6 and VW Passat MY 2000. These differences include multiple platforms, various implementations of the 2.8L V6 engine, different calibrations, different under hood packages, different air intake components and throttles, different crankcase ventilation systems, different under hood airflow characteristics, different under hood operating temperatures, and different engine operating characteristics.

Based on the above, Volkswagen believes these differences contribute to significantly lower occurrence rates in the other subject vehicles.

Source: VWAG
Date Gathered: 10/7/2004