

VOLKSWAGEN



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OFFICE OF DEFECTS
INVESTIGATION

3600 Hamlin Road
Farm Hills, MI 48326
Tel. (248) 754-5000

February 4, 2005

Thomas Z. Cooper, Chief
Office of Defects Investigation
US Department of Transportation
National Highway Traffic Safety Administration
400 Seventh Street, S.W.
Washington, DC 20590

Subject: PE04-079 NVS-212jfa; Fuel Pump Leak

Dear Mr. Cooper,

Attached is our response to your letter dated December 1, 2004 requesting information concerning gasoline leaks from the fuel pump in certain 1998-2000 model year Volkswagen Golf and GTI 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,

A handwritten signature in black ink, appearing to read 'John Maddox', written over a horizontal line.

John Maddox
Compliance Officer
Volkswagen of America

Attachments

Volkswagen is including in our response the 1999 through 2003 New Beetle, 1999-2003 Jetta, and 2001-2004 Golf and GTI, since they use the same fuel supply module ("fuel pump") as used in production of the subject 1999 and 2000 Golf and GTI vehicles. This fuel pump carries the part numbers 1J0 919 051 H and 1J0 919 051J.

Request 1.

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

- a. Vehicle identification number (VIN);
- b. Make;
- c. Model;
- d. Model Year;
- e. Date of manufacture;
- f. Date warranty coverage commenced; and
- g. 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."

Response 1.

In response to this inquiry, Volkswagen has identified the following vehicle population:

Model	1999	2000	2001	2002	2003	2004
Golf/GTI	10,580	24,481	29,284	26,742	30,013	17,318
Jetta Sedan	83,867	127,872	137,020	112,674	116,118	
Jetta Wagon			5,104	11,671	9,128	
New Beetle	63,839	83,612	66,016	48,290	36,336	
New Beetle Convertible					18,511	

Our response to this request including subparagraphs a. through g. is provided in a Microsoft Access file entitled, "PRODUCTION DATA.mdb" attached hereto as Exhibit to Request 1.

Source: Business Objects. Data Gathered: Through December 1, 2004

Exhibit to Request 1

PRODUCTION DATA

Data is provided in Microsoft Access format on PE04-079 Data Collection Disc

Request 2.

State the number of each of the following, received by VW, or of which VW is 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. Property damage claims;
- e. Third-party arbitration proceedings where VW is or was a party to the arbitration; and
- f. Lawsuits, both pending and closed, in which VW is or was a defendant or codefendant.

For subparts "a" through "f" 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 "f," provide a summary description of the alleged problem and causal and contributing factors and VW's assessment of the problem, with a summary of the significant underlying facts and evidence. For items "e" and "f," 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 this inquiry, Volkswagen has identified 17 consumer complaints, none of which are from fleet operators, which allege some quantity of liquid gasoline due to a leak in the fuel pump in the subject vehicles. Volkswagen is unable to determine or estimate the amount of fuel that was alleged to be leaking from the fuel pump in these complaints. Volkswagen is also providing copies of complaints in which, based on the information contained in the report, Volkswagen is unable to determine if they may or may not be related to the alleged defect in the subject component. Most of these reports contain an ambiguous allegation of a fuel pump "leak", but it is unspecified if it is a vapor or vacuum leak. The remainder of these reports allege a "broken" or "cracked" fuel pump, but it is not specified if these resulted in a leak of any kind.
- b. In response to this inquiry, Volkswagen did not identify any field reports of a liquid leak from the fuel pump on the subject vehicles. Volkswagen has identified one field report related to a "broken" fuel pump, however it is ambiguous if it resulted in a "leak".
- c. In response to this 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.

Additionally, Volkswagen has not identified any reports of fire related to the alleged defect in the subject vehicles.

- d. In response to this inquiry, Volkswagen has not identified any property damage claims related to the alleged defect in the subject vehicles.

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

Source: VW LISTEN, VW TACS, VW FRED, Product Liaison
Data Gathered: Through December 1, 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. VW'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."

Response 3.

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 PE04-079 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 VW used for organizing the documents.

Response 4.

In response to this inquiry, Volkswagen is providing copies of documents identified for each item in Response 2. The documents are provided in an Adobe Acrobat file entitled "REQUEST NUMBER FOUR DATA.pdf" attached hereto as Exhibit to Request 4.

Volkswagen is also providing copies of customer complaints 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 an Adobe Acrobat file entitled "NON-SPECIFIC NUMBER FOUR DATA.pdf" attached hereto as Exhibit to Request 4.

Volkswagen organized the attached documents by Model Year, Model and Category.

Source, Data Gathered: See Response Two

Exhibit to Request 4

REQUEST NUMBER FOUR DATA

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NON-SPECIFIC NUMBER FOUR DATA

**Data is provided in Adobe Acrobat format in the REQUEST NUMBER FOUR folder on PE04-079
Data Collection Disc**

Request 5.

State, by model and model year, a total count for all of the following categories of claims, collectively, that have been paid by VW 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. VW'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(s), if any, by the dealer/technician relating to the claim and/or repair.

Provide this information in Microsoft Access 2000, or a compatible format, entitled "WARRANTY DATA."

Response 5.

In response to this inquiry Volkswagen has identified five warranty claims that allege a liquid fuel leak from the fuel pump in the subject vehicles. Volkswagen is unable to determine or estimate the amount of fuel that was alleged to be leaking from the fuel pump in these claims. Volkswagen is also providing copies of claims in which, based on the information contained in the report, Volkswagen is unable to determine if they may or may not be related to the alleged defect in the subject component. A substantial number of these claims contain an ambiguous allegation of a fuel pump "leak", but it is unspecified if it is a vapor or vacuum leak. The remainder of these claims allege a "broken" or "cracked" fuel pump, but it is not specified where in the fuel supply module the "breakage" or "crack" occurred or that a leak of any kind resulted.

Our response to this request is provided in Microsoft Excel format attached hereto as Exhibit to Request 5.

Source: Business Objects. Data Gathered: Through December 1, 2004

Exhibit to Request 5

WARRANTY DATA

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AMBIGUOUS WARRANTY DATA

**Data is provided in Microsoft Excel format in the REQUEST NUMBER FIVE folder on PE04-079
Data Collection Disc**

Request 6.

Describe in detail the search criteria used by VW 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 VW 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 VW 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 6.

In response to this inquiry, the following methods were used to identify claims in response to request number five.

1. All subject vehicles made available for sale or lease in the United States with claims starting in calendar week one of 1997 through the calendar week of the inquiry.
2. All warranty claims containing the following part numbers:

<u>Part Number</u>	<u>Description</u>
1J0819057*	Fuel Supply Module
1J0919051*	Fuel Supply Module (assembly)

* = wild card

Resultant claims were screened individually to identify conditions, which relate or may relate to the alleged defect in the subject vehicles.

Volkswagen has identified, through screening the resultant claims, a list of all labor operations, labor operation descriptions, problem codes, and problem code descriptions applicable to the alleged defect in the subject vehicles. The following overviews these findings:

Labor Operation: 2068 1900 - REMOVE AND INSTALL FUEL PUMP

Damage Codes:

- 10 - Mechanical defect
- 11 - Incorrectly adjusted
- 15 - Broken, cracked, torn
- 16 - Ineffective
- 17 - Binding
- 20 - Noisy
- 40 - Electrical Malfunction
- 50 - Leaking
- 88 - Upon instruction from Volkswagen
- 88 - Vehicle towed in to dealership

The following is a list, by make and model year, of the terms of the new vehicle warranty coverage offered by Volkswagen on the subject vehicles:

Model Year	Warranty Terms and Vehicles	Coverage Type
1999	2 years / 24,000 miles : New Beetle, Golf/GTI, Jetta	Bumper to Bumper
2000	2 years / 24,000 miles : New Beetle, Golf/GTI, Jetta	Bumper to Bumper
2001	2 years / 24,000 miles : New Beetle, Golf/GTI, Jetta	Bumper to Bumper
2002	4 years / 50,000 miles : New Beetle, Golf/GTI, Jetta	Bumper to Bumper
2003	4 years / 50,000 miles : New Beetle, Golf/GTI, Jetta	Bumper to Bumper
2004	4 years / 50,000 miles : Golf/GTI	Bumper to Bumper

Source: VWoA. Date Gathered: Through December 1, 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 VW 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 VW is planning to issue within the next 120 days.

Response 7.

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

Source: VESIS. Date Gathered: Through December 1, 2004

Request 8.

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

In response to this inquiry, Volkswagen has not identified any assessments, analyses, tests, test results, studies, surveys, simulations, investigations, inquiries and/or evaluations (collectively, "actions") that have been conducted as of the date of the inquiry related to cracked or broken fuel pumps in the subject vehicles resulting in a fuel leak.

As of the date of the inquiry, Volkswagen is currently attempting to obtain for inspection subject vehicle(s) in the US that may contain the alleged defect, or have alleged such a condition in the past. Since the alleged defect is an extremely rare occurrence, Volkswagen has not yet been able to inspect a vehicle exhibiting the alleged defect. These fuel pumps were placed on submission beginning December 8, 2004. As of the date of this response, Volkswagen has not begun any studies of these vehicles.

When available, Volkswagen will make the results of these analyses available to NHTSA.

Source: VWAG/VWofA. Date Gathered: February 1, 2004

Request 9.

Describe all modifications or changes made by, or on behalf of, VW in the design, material composition, manufacture, quality control, supply, or installation of the subject component(s), 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 VW is aware of which may be incorporated into vehicle production within the next 120 days.

Response 9.

In response to this inquiry, Volkswagen did not identify any modifications or changes in the design, material composition, manufacture, quality control, supply, or installation of the subject fuel pump due to the fuel pump cracking or leaking due to fuel pump cracking.

Volkswagen did identify one design change in the fuel pump (from 1J0919051H to 1J0919051J) coinciding with the start of Golf production in Brazil, which included provisions for use of higher content Ethanol fuel as found in the Brazilian market, as described below. The previous level (1J0919051H) continued to be used in production in Mexican built vehicles (Jetta, New Beetle, New Beetle Convertible) until May 2003.

Volkswagen does not believe that this is related to the alleged defect.

Part Number	Information
1J0919051J	<p>a. June 2000</p> <p>b. The following modifications were made to the fuel pump:</p> <ul style="list-style-type: none"> • The alloy of the aluminum housing of the electrical fuel pump has been designed in a way to make it more resistant to E22 fuel qualities (used in Brazil) • The holder of the permanent magnet inside the electrical fuel pump was designed with an E22 fuel resistant coating • The electrical contacts connecting the fuel pump with the wiring of the vehicle were designed with a E22 resistant silver coating <p>c. The "H" part was modified to "J" in order to adapt the part to different fuel qualities found in other markets (e.g. for higher concentrations of ethanol in the fuel for markets like Brazil). For standardization reasons and to reduce the number of different part versions, the modified fuel supply modules were also used in Brazilian built Golf vehicles for the US market.</p> <p>d. Production part - 1J0919051H; Service part - 1J0919087H</p> <p>e. Modified component production part - 1J0919051J; Service part - 1J0919087J</p> <p>f. 1J0919051H was phased out of from serial production until stocks were depleted approximately May 2003 and the correlating service part, 1J0919087H, was used for spare parts sale until stocks were depleted approximately July 2002.</p> <p>g. The modified component 1J0919087J became available as a service component approximately in the beginning of 2001.</p> <p>h. This part is physically interchangeable with its predecessor 1J0919051H, except for countries with high ethanol content.</p>

Volkswagen is not aware of any modifications or changes planned for production within the next 120 days to the fuel supply module.

Request 10.

State the number of each of the following that VW 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):

- a. Subject component(s); and
- b. Any kits that have been released, or developed, by VW for use in service repairs to the subject component(s)/assembly.

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 VW 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 10.

Volkswagen is unable to determine if the sale of any given service part is related to the alleged defect in the subject vehicles.

No kits have been released, or developed, by Volkswagen for use in service repairs to the subject/component assemblies.

Supplier Name and Address information for Fuel Pumps:

Supplier / Production

Siemens VDO
Fuel-Supply-Systems
Sodenerstrasse 9
65824 Schwalbach a.T.
Germany

Siemens VDO Automotive
Chimenes 4300 Parque Industrial Juárez
Cd. Juárez, Chihuahua, México C.P. 32360
Mexico

Siemens VDO Automotive Ltda.
Av. Senador Adolph Schindling, 165
Vila das Bandeiras
07042-020 Guarulhos, SP
Brazil

Siemens VDO (USA, Winchester)
no longer in operation

Appropriate point of contact for all production plants is:

Siemens AG
Mr. Rolf Müller
Kruppstrasse 105
60386 Frankfurt
Germany

Phone: +49(0)69/40 80 54 74
Fax: +49(0)69/40 80 54 73

Please reference the Microsoft Excel file entitled "PART SALES DATA.xls" attached hereto as Exhibit to Request 10.

Source, VWAG/IDB. Data Gathered: Through January 9, 2004

Exhibit to Request 10

PART SALES DATA

Data is provided in Microsoft Excel format on PE04-079 Data Collection Disc

Request 11.

Furnish VW'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 component was malfunctioning; and
- f. The reports included with this inquiry.

Response 11.

At this time, Volkswagen is unable to provide a conclusive assessment of the causal or contributory factors, or any failure mechanisms or failure modes for the reports of liquid leaks from broken or cracked fuel pumps in the subject vehicles.

Volkswagen is actively attempting to obtain for inspection any subject vehicle(s) that currently may contain the alleged defect, or have reported such a condition in the past. It is Volkswagen's intent to inspect these vehicle(s), and if possible remove components of the fuel system for further detailed analysis. When available, Volkswagen will make the results of these analyses available to NHTSA.

Volkswagen notes that the vast majority of reports identified allege fuel "odor" or "smell", or an ambiguous "leak." Volkswagen believes that these reports represent vapor and/or vacuum leaks, and not actual liquid fuel leaks. Many reports indicate a progression in the presence and intensity of the fuel odor over a period of days or weeks, which provides a warning with ample time to take the vehicle to the dealership for service.

Volkswagen notes that the reports of liquid leaks from broken or cracked fuel pumps appear to be isolated incidents. The reports of liquid fuel leak, which are unverified, are extremely limited for the over 1 million vehicles using the subject fuel pump in operation in the U.S.

Volkswagen has not identified any reports of fire, accident, injury, or fatality related to any failure, malfunction or otherwise unsatisfactory performance of the fuel delivery pump that results from a fuel pump leak on the subject vehicles.

However, Volkswagen takes very seriously reports of liquid fuel leakage, and in an abundance of caution, is actively attempting to obtain subject vehicles and components for detailed analysis. Volkswagen is continuing to monitor this matter and will provide the Agency with the results of these analyses when available.