



Volvo Cars of North America, LLC

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September 3, 2004

Mr. Thomas Z. Cooper, Chief
Vehicle Integrity Division
Office of Defects Investigation
National Highway Traffic Safety Administration
Room 5326
400 Seventh Street, S.W.
Washington, D.C. 20590

NVS-212jfa
RQ04-004

Dear Mr. Cooper:

This letter and its enclosures comprise the second part of the response of Volvo Cars of North America, LLC (VCNA) to your June 9, 2004 request for information relating to Preliminary Evaluation RQ04-004, received on June 9, 2004. The extension of the due date to September 3, 2004 was agreed between Volvo and NHTSA. On August 27, 2004 there was a discussion between myself and your Mr. Abbott. This letter summarizes our response to questions 8-11. The requested data for these questions is provided as separate enclosures. Our conclusion and response to question 12 is also being submitted. We plan on meeting with the agency on September 10, 2004 about this matter.

In order to respond to RQ04-004, Volvo undertook a thorough and diligent search. We spoke to a variety of affected persons, in the United States and Sweden, who in the course of their daily business are responsible for the various items related to the request. They, in good faith, conducted a thorough search for the information. Our response is based upon this diligent and thorough search.

The information contained in this letter and its attachments responds to your questions regarding RQ04-004, pertaining to the alleged loss of headlight function of the subject vehicles model year 1998 Volvo S/V/C70's excluded from Volvo Recall 94 and model year 1999 Volvo S/V/C70's. In Volvo Recall 94 the headlight switch was replaced.

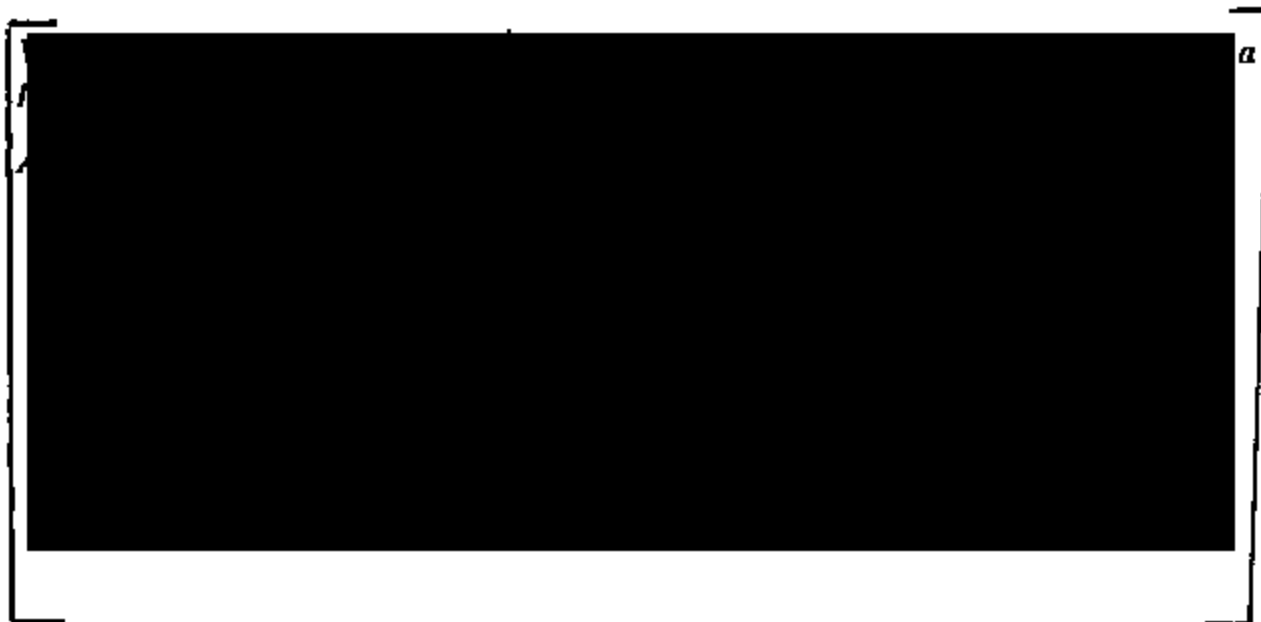
We have provided below and as separate enclosures answers to these questions 8 - 11 using the documentation and systems available to us that in the normal course of business contain the type of information that was requested from us. Please note that for the purpose of this PE we are using data up through and including June 9, 2004 when our search began for this information.

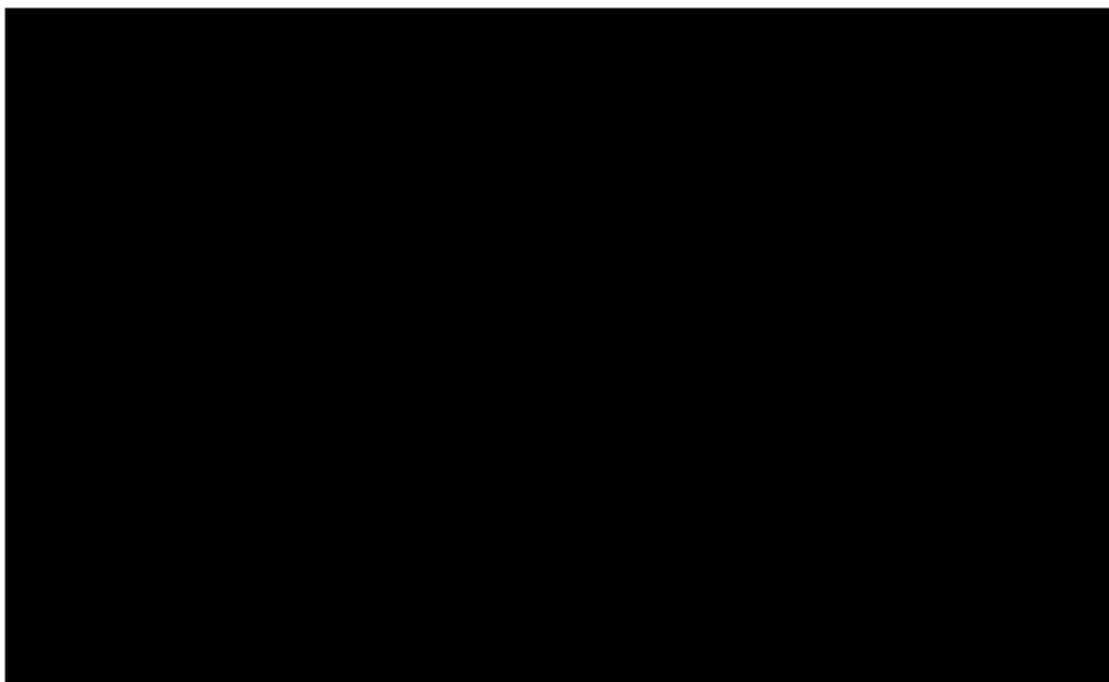
Answers to questions 8 - 11:

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, Volvo. 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.

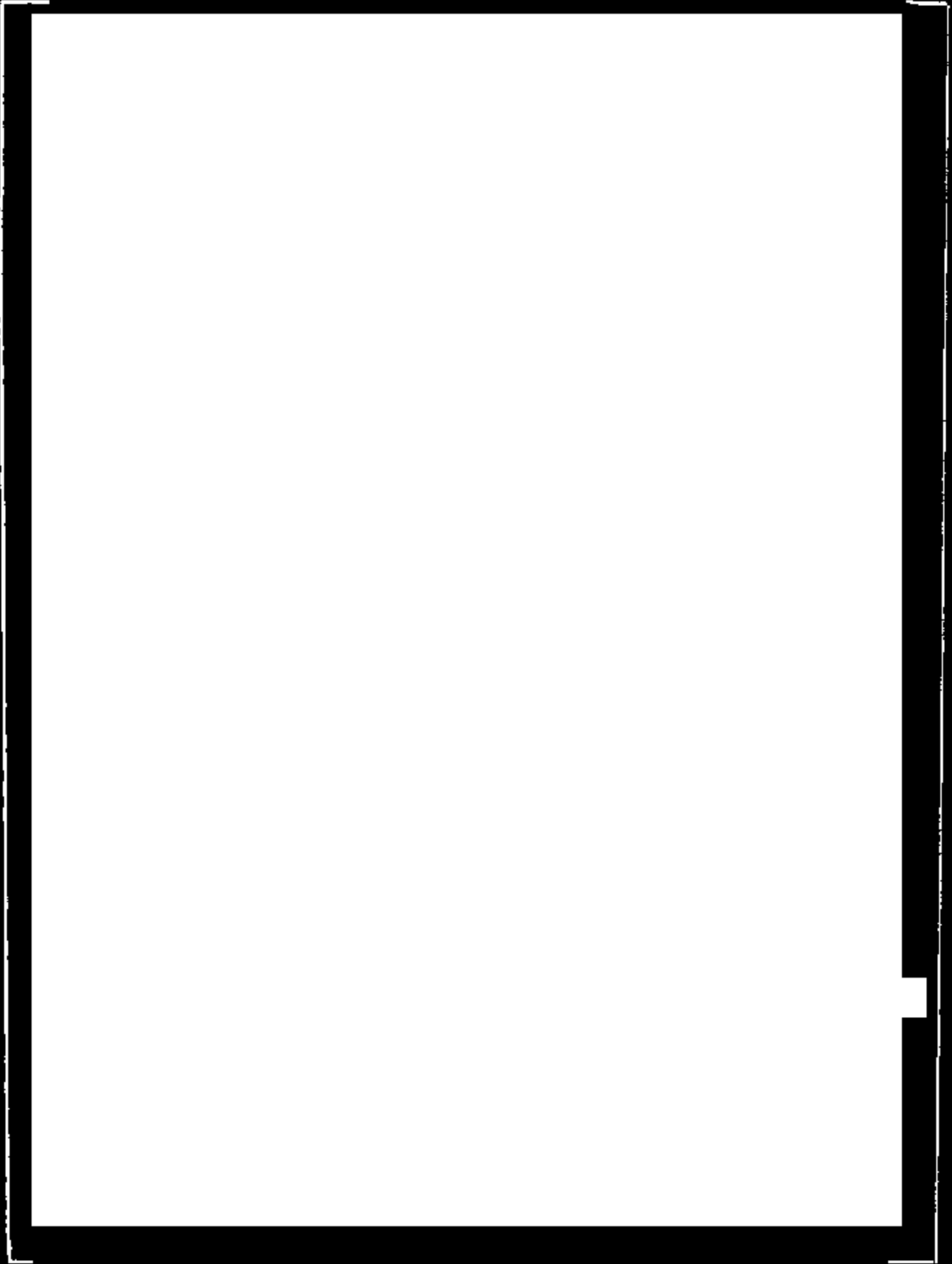
Answer:



9. Describe all assessments, analyses, tests, test results, studies, surveys, simulations, investigations, inquiries and/or evaluations (collectively, "actions") that relate to the defect in the vehicles included in Volvo recall campaign number 94 that have been conducted, by, or for, Volvo to date. 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;
 - f) A detailed discussion of the of the findings and/or conclusions resulting from the action;
 - g) How the scope of the recall campaign was determined; and
 - h) A detailed description of the recall remedy, including a discussion of how the remedy parts differ from the recalled parts.

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.

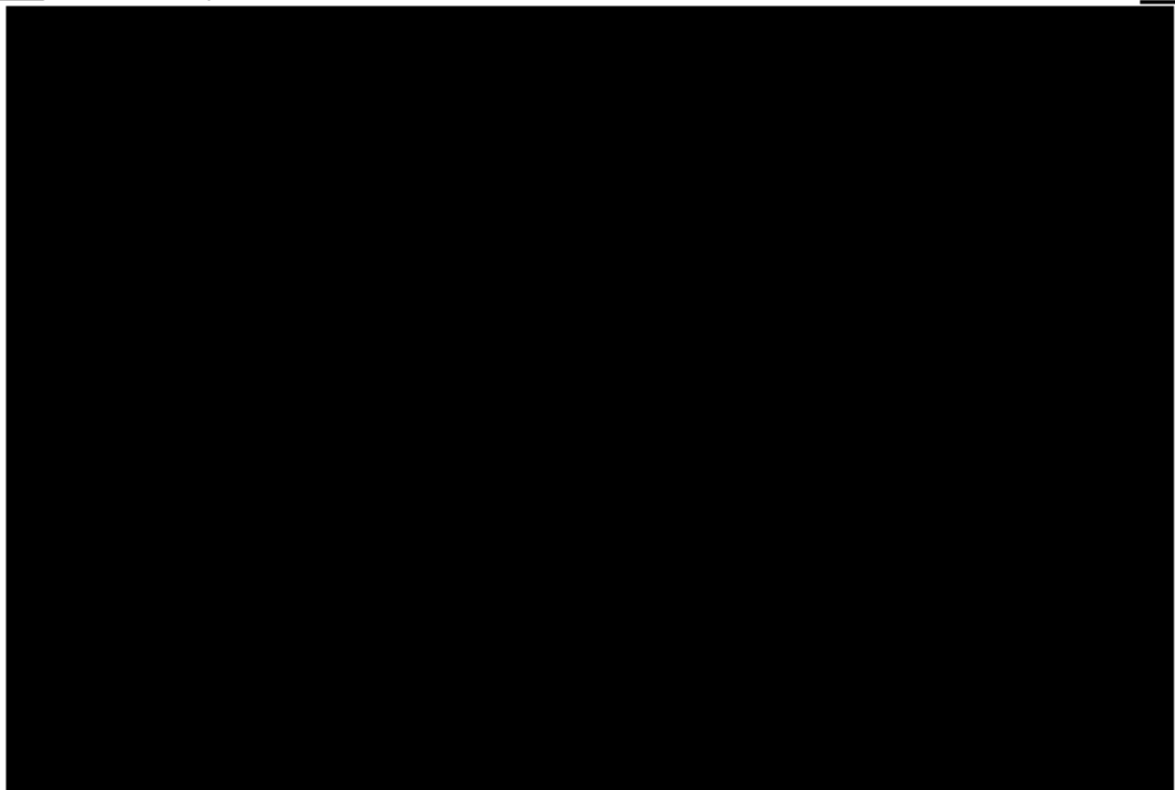
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10. State the number of all parts and assemblies related to the alleged defect (including any kits that have been released, or developed, for use in service repairs) that Volvo has sold for use in the subject vehicles to date by component name, part 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) Also identify by make, model and model year, any other vehicles of which Volvo is aware that contain the identical component, whether installed in production or in service, and state the applicable dates of production or service usage.

Answer:

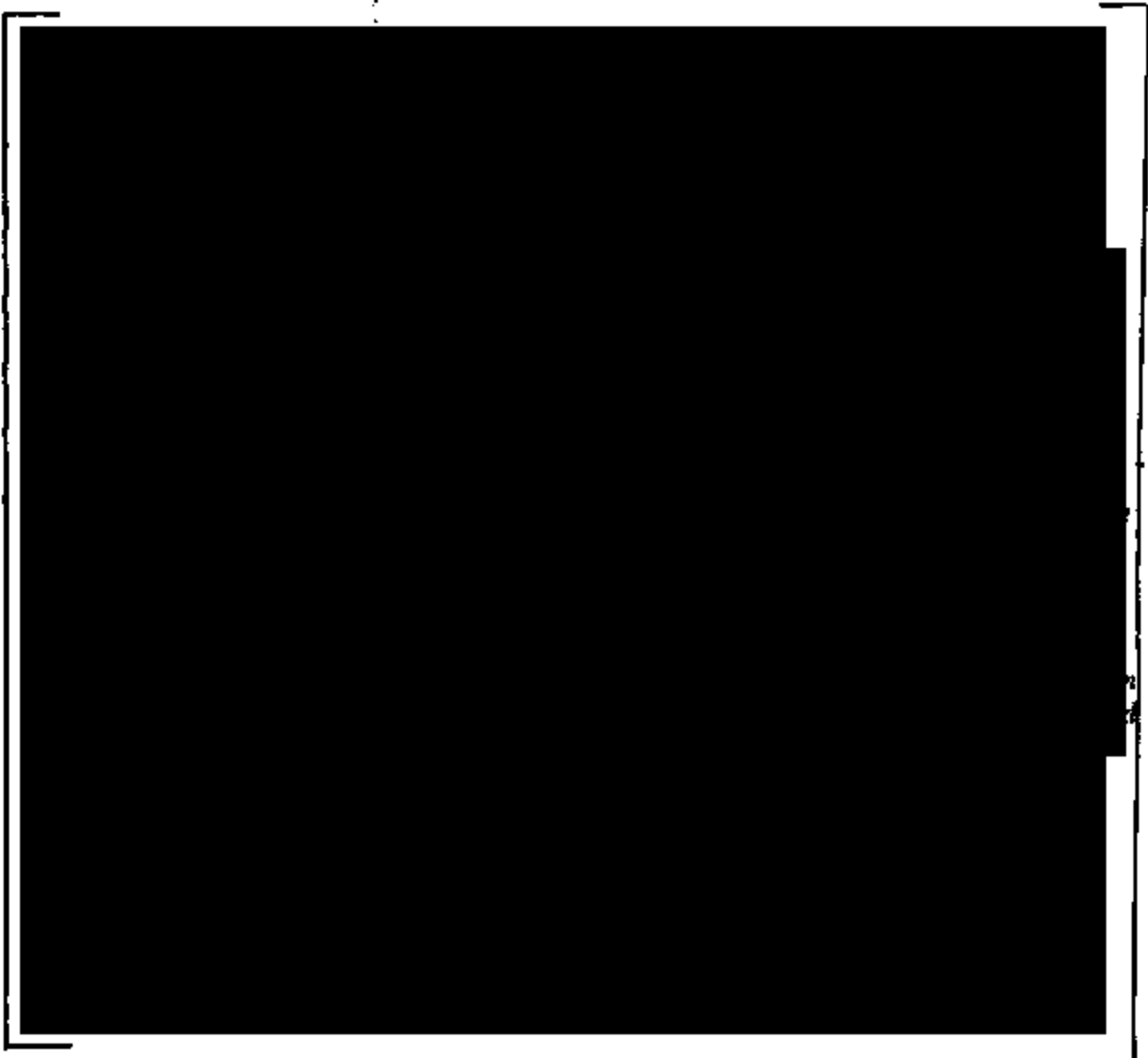


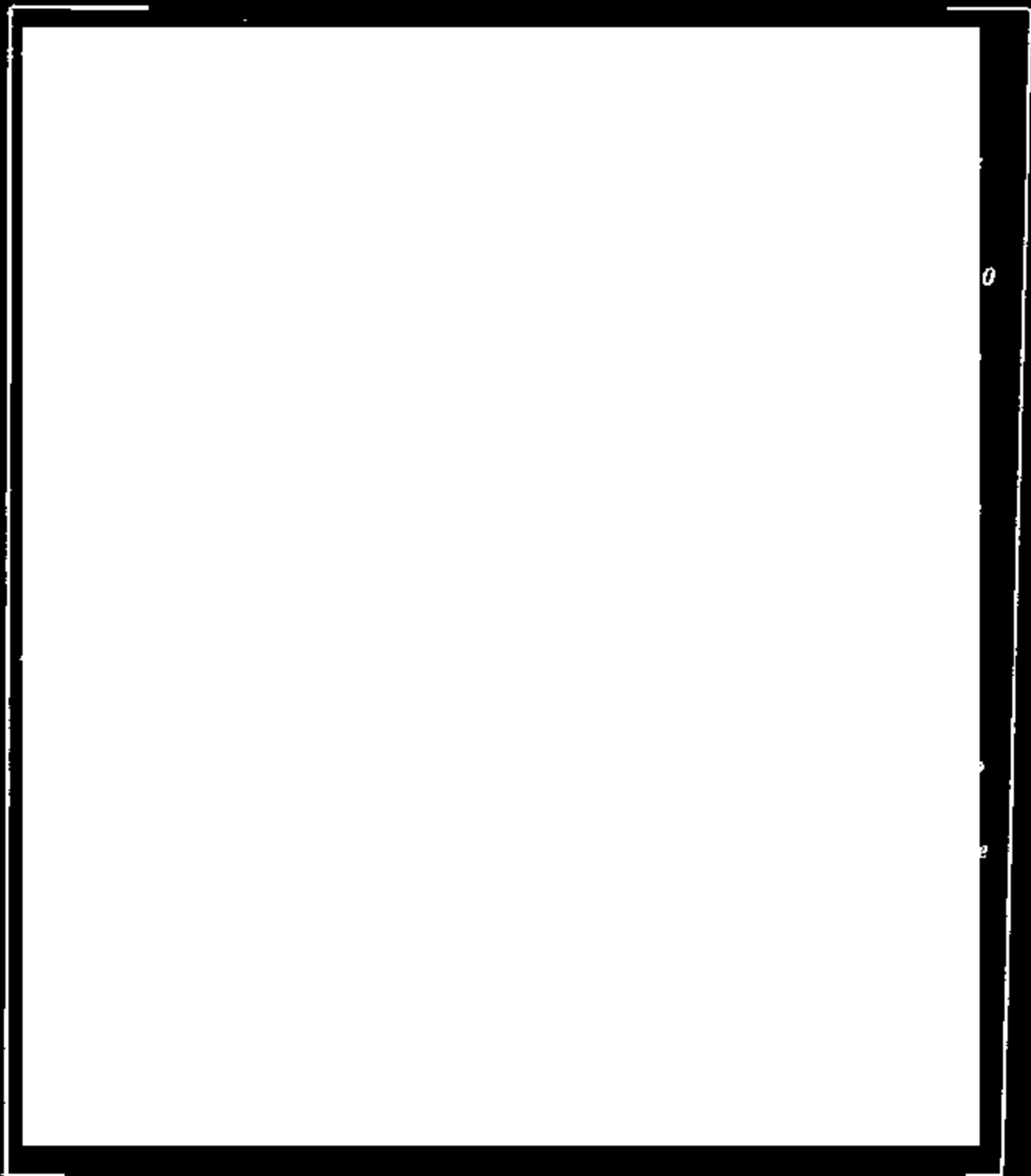
11. Describe all modifications or changes made by, or on behalf of, Volvo in the design, material composition, manufacture, quality control, supply, or installation of all components, from the start of production to date, which relate to, or may relate to, the alleged defect in the subject vehicles. For each such modification or change, provide the following information:
- The date or approximate date on which the modification or change was incorporated into vehicle production;
 - 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 Volvo is aware of which may be incorporated into vehicle production within the next 120 days.

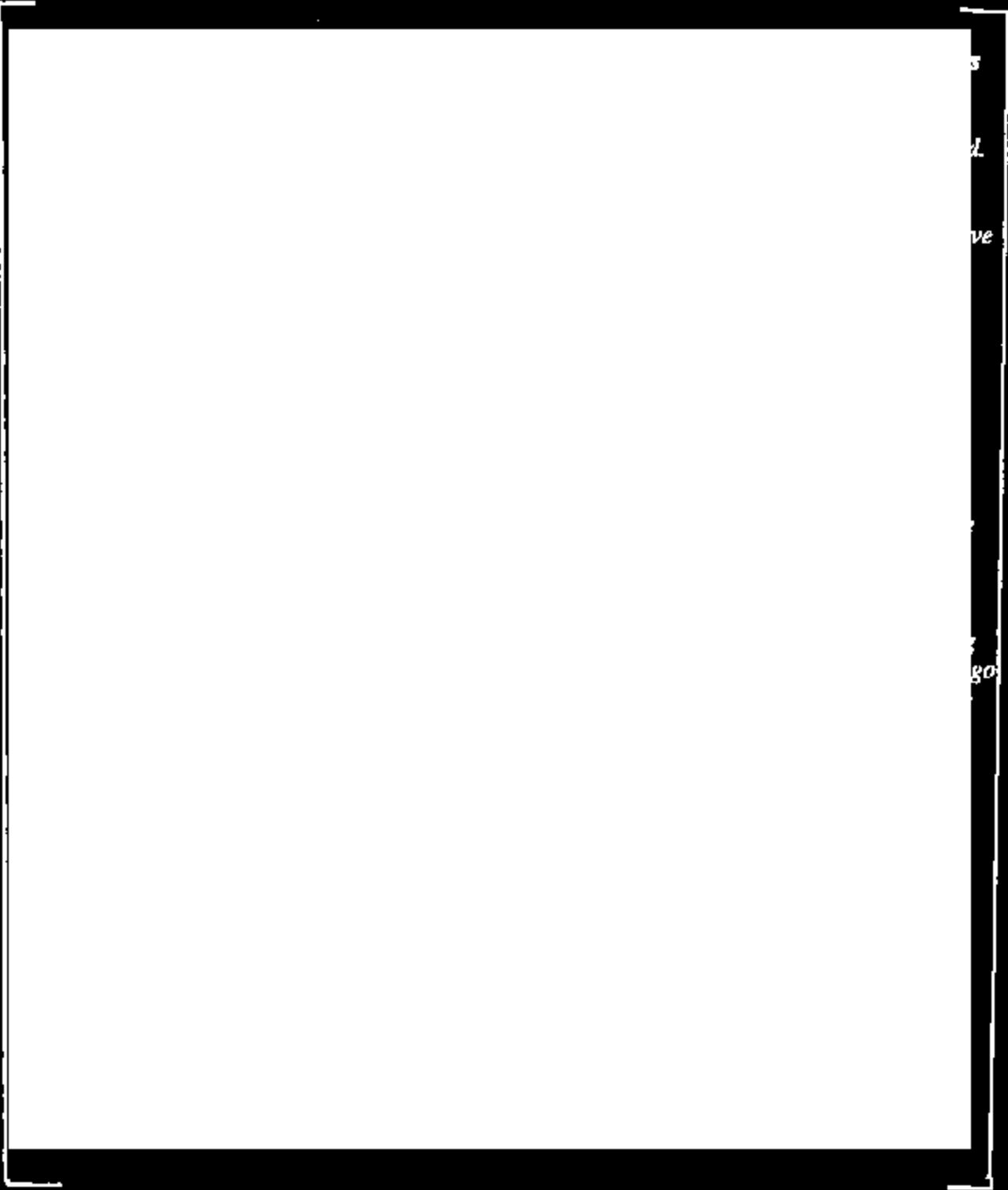
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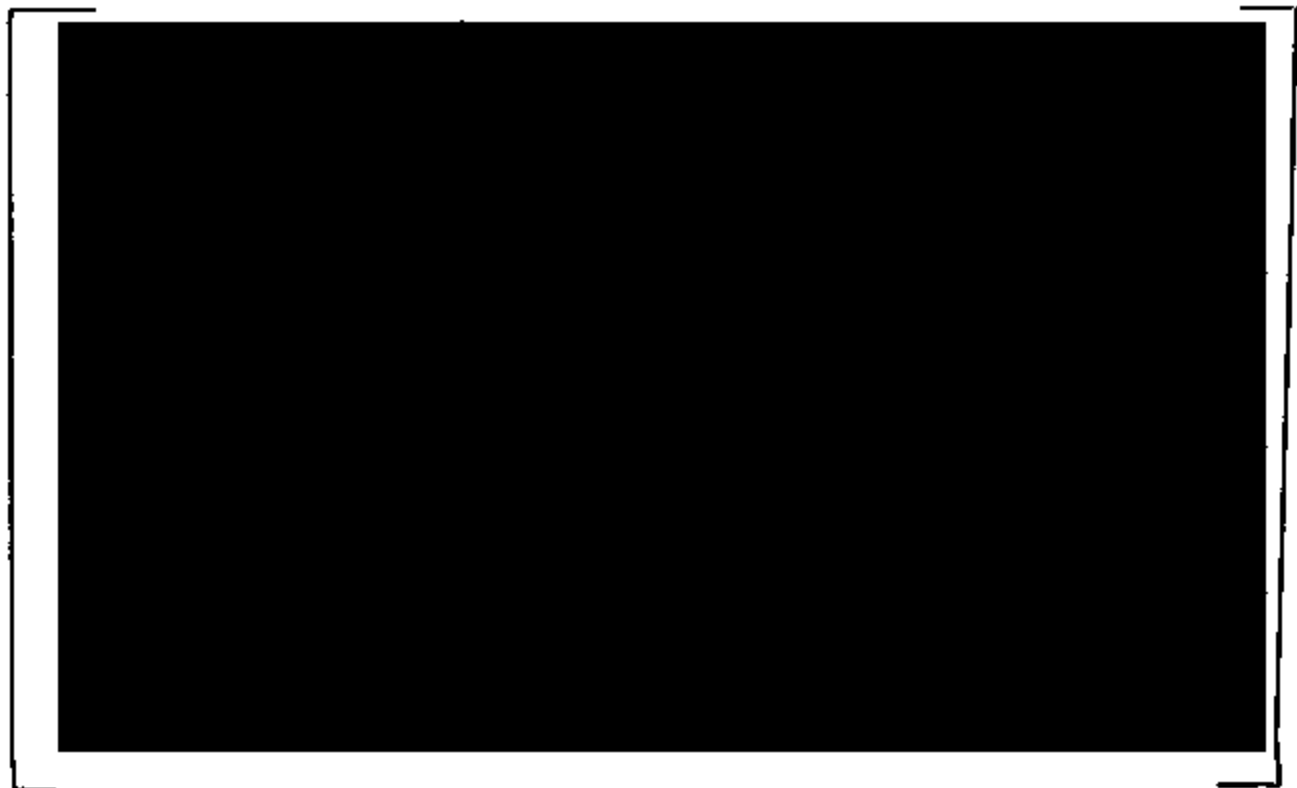


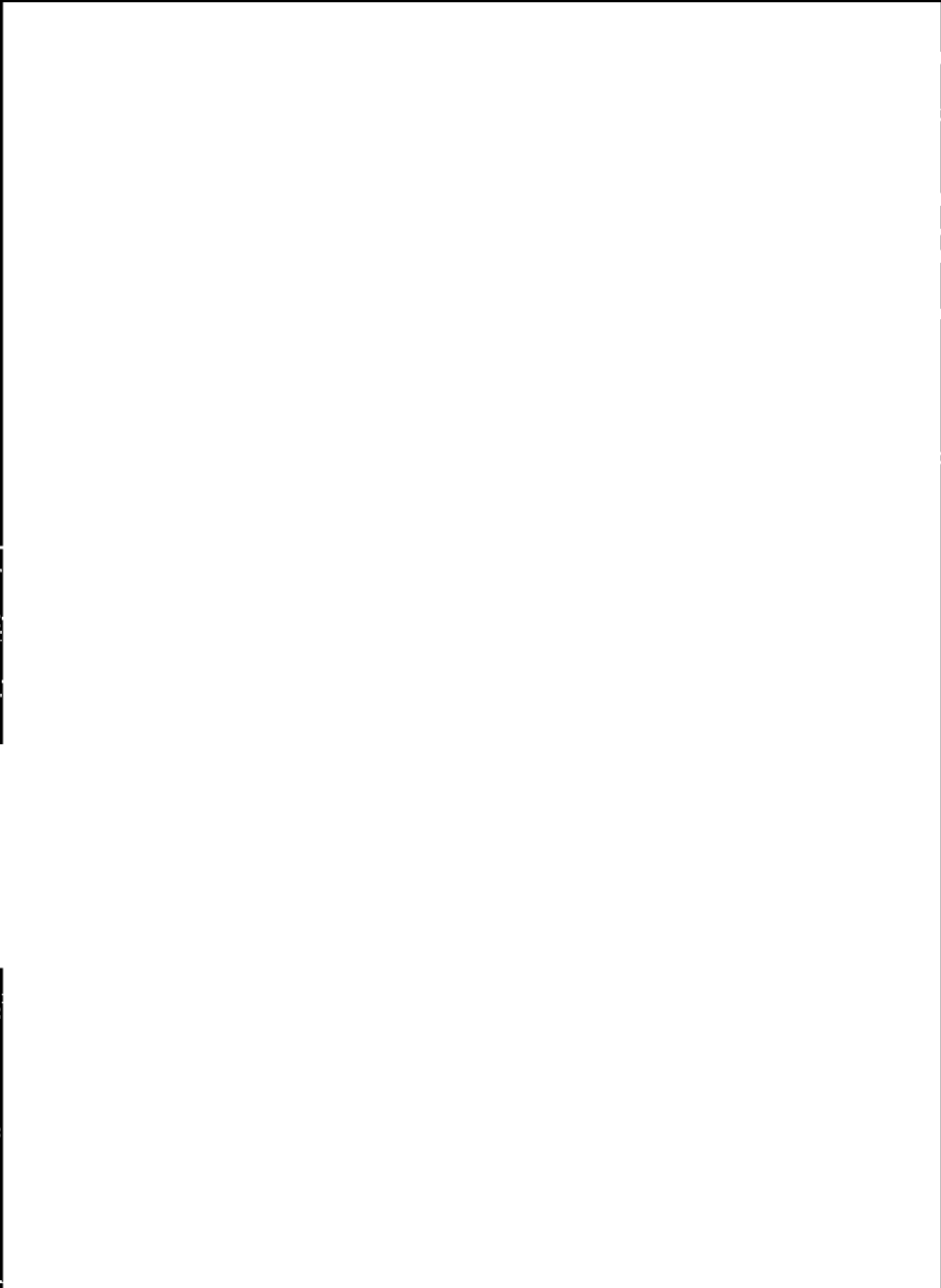
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12. Furnish Volvo's assessment of the alleged defect in the subject vehicle, including:
- a) The causal or contributory factor(s);
 - b) The failure mechanism(s);
 - c) The failure mode(s);
 - d) The risk to motor vehicle safety that it poses;
 - e) 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.

Answer





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Sincerely yours,

VOLVO CARS OF NORTH AMERICA, LLC
Customer Service

William Shapiro
William Shapiro, P.E.
Manager, Regulatory and Product Compliance

Enclosure