



**Volvo Cars of North America, LLC**

Jeffrey L. Quandt, Chief  
Vehicle Control Division, Office of Defects Investigation  
National Highway Traffic Safety Administration  
Room 5326  
400 Seventh Street, S.W.  
Washington, D.C. 20590

NVS-213dlr/ PE05-050

January 9, 2006

Dear Mr. Quandt:

This letter and its enclosures comprise the response of Volvo Cars of North America, LLC (VCNA) to your November 22, 2005 request for information relating to Preliminary Evaluation PE05-050 for a comparative assessment of certain Volvo vehicles (peer vehicles) in relation to certain model year 2004-2005 Nissan Murano vehicles which are being investigated by NHTSA for being allegedly susceptible to puncture from road debris

In order to respond to PE05-050, Volvo undertook a thorough and diligent search. Volvo in good faith reviewed all available documentation within its control to answer NHTSA's questions pertaining to alleged puncture from road debris in all model year (MY) 2003 - 2005 Volvo XC90 vehicles manufactured for sale or lease in the United States. 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.

We have provided below and as separate enclosures (a combination of hardcopy and electronic documents), answers to questions 1 - 8 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 November 22, 2005 when our search began for this information.

1. State, by model and model year, the number of subject vehicles Volvo has manufactured for sale or lease in the United States. Separately, for each subject peer 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; and
- f. The State in the United States where the vehicle was originally sold or leased (or delivered for sale or lease).

Provide this information in Microsoft Access 2003, or a compatible format, entitled "PE05-050 VOLVO PRODUCTION DATA."

*Data provided on CD-ROM for Volvo XC90:*

<i>Model Year 2003</i>	<i>12,828 vehicles</i>
<i>Model Year 2004</i>	<i>52,615 vehicles</i>
<i>Model Year 2005</i>	<i>39,666 vehicles</i>

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 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 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.

*There have been no complaints, reports, claims, proceedings or lawsuits for #2a-2g above.*

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. Volvo'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 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 2003, or a compatible format, entitled "PE05-050 VOLVO REQUEST NUMBER TWO DATA."

*There have been no complaints, reports, claims, proceedings or lawsuits for #2a-2g above.*

4. Produce copies of all documents related to each of items "c" through "e" within the scope of Request Number Two. Organize the documents separately by category (i.e., crash/injury/fatality reports, property damage claims, etc.) and describe the method Volvo used for organizing the documents.

*There have been no complaints, reports, claims, proceedings or lawsuits for #2a-2g above.*

5. 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: 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 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 2003, or a compatible format, entitled "PE05-050 VOLVO WARRANTY DATA."

*There have been no warranty claims. Volvo would not replace a road hazard under warranty.*

6. Describe in detail the search criteria used by Volvo 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 in Microsoft Access 2003, or a compatible format. State, by make and model year, the terms of the new vehicle warranty coverage offered by Volvo on the subject vehicles (i.e., the number of months and mileage for which coverage is provided and the vehicle systems that are covered).

*All fuel tank related operations were searched:*

*23404 – Fuel tank draining / filling*

*23412 – Fuel tank install – remove / replace (Includes draining & refilling)*

*23426 – Filler pipe fuel tank replace*

*23428 – Fuel tank install / remove / replace (excludes drain & refill)*

7. Produce copies of all service, warranty, and other documents that relate to, or may relate to, the subject condition in the subject peer vehicles, that Volvo 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 Volvo is planning to issue within the next 120 days.

*There have been no service, warranty or other documents issued.*

8. Provide the following information concerning the subject fuel tank assemblies:
  - a. Drawings showing the nominal and minimum (full jounce) design ground clearance of the subject fuel tank assembly and the corresponding location(s) on the tank assembly – state all assumptions (e.g., tire inflation pressure);
  - b. Identify all subject vehicle components that have lower ground clearances for each condition cited in "8.a" than the subject fuel tanks and state the location and ground clearance dimension of each;
  - c. State the minimum design ground clearance for each condition cited in "8.a" for the subject vehicles, the bases for that dimension, the associated component/structure, and the location;
  - d. Provide a bottom view drawing or picture showing the undercarriage of the vehicle in the fully built configuration with the fuel tank and the locations of all components identified in "8.b" and "8.c" clearly marked;

- e. Copies of all engineering specifications relating to the packaging, shielding, ground clearance, and/or puncture resistance of the subject fuel tanks;
- f. Copies of all engineering standards, design guides, or similar documents that relate in any way to the packaging, shielding, ground clearance, and/or puncture resistance of fuel tanks in passenger cars or light trucks (including vans and utility vehicles);

*Please refer to the following documents:*

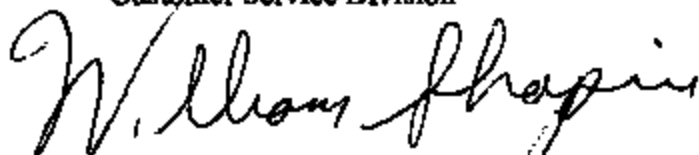
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As requested, Volvo's response to this letter, in duplicate, together with a copy of a confidentiality request, is being submitted by January 10, 2006.

Please contact myself or Diana Lidgett if you have any questions concerning the above and the enclosed material.

Sincerely yours,

VOLVO CARS OF NORTH AMERICA, LLC  
Customer Service Division



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

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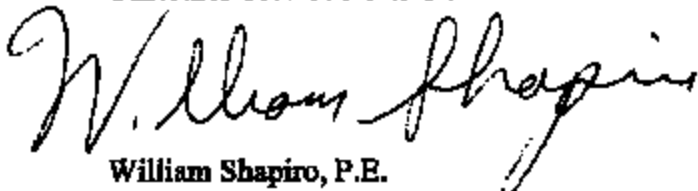
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