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DATE 10/17/06 BY 60322/UC/STP

February 27, 2006

Mr. Jeffrey 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-213  
EA05-021

Dear Mr. Quandt:

This letter and its enclosure comprise the partial response of Volvo Cars of North America, LLC (VCNA) to your request for information relating to Engineering Analysis EA05-021. As agreed our response is now due on March 27, 2006. Enclosed is the information which is available February 27, 2006. We have responded to questions #1, 2, 3, 4, 5, 6, 7, 8, 14, and 16.

In order to respond to questions #1, 2, 3, 4, 5, 6, 7, 8, 14, 16 of EA05-021 Volvo (Volvo Car Corporation and VCNA) in good faith conducted a thorough and diligent search of Volvo systems. Our response is based upon this diligent and thorough search.

As requested, our answer follows a repeat of the question:

1. **State, by model, model year and engine, the number of subject vehicles Volvo has manufactured for sale or lease in the United States. Separately, for each subject vehicle manufactured to date by Volvo, state the following:**
  - o **Vehicle identification number (VIN);**
  - o **Model;**
  - o **Model Year;**
  - o **Engine;**
  - o **Date of manufacture;**
  - o **Date warranty coverage commenced; and**
  - o **State in which the vehicle was sold.**

**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, which provides further details regarding this submission.**

*Refer to CD-ROM, enclosed for an update of the above information. Of the vehicles added to the subject vehicle population since the PE submission, the MY2002 Volvo C70 has the subject component and the population for the MY2002 C70 is therefore provided within this submission.*

*Any blank fields seen within this section of the database are seen because the vehicle owner or the dealer has not provided certain information. After a thorough and diligent effort we have been unable to produce this specific information.*

**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:**

- **Consumer complaints, including those from fleet operators;**
- **Field reports, including dealer field reports;**
- **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;**
- **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;**
- **Property damage claims; and**
- **Third-party arbitration proceedings where Volvo is or was a party to the arbitration; and**
- **Lawsuits, both pending and closed, in which Volvo is or was a defendant or codefendant and;**
- **Proceedings involving any local, state or federal government agency.**

**For subparts "a" through "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 "e," 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" through "h" 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.**

*Volvo is sending all information relating to Failure or malfunction of the ETM. In order to accomplish this for Consumer Reports and Field Reports a text mining search was used. Submitted reports have any one of the following words: ETM, ETS, Throttle.*

- *Consumer Reports were provided using this general search in response to PE05-050. Therefore, these reports have been updated to include reports from August through December 2005.*
- *Field reports included are from the very first reports through December 2005. This is because a more narrow alleged defect was used for the PE submission of these reports.*

Type	Number
a. Consumer Reports	283
b. Field Reports – TIE	87
Tech Hotline	8852
<i>NOTE: At a certain point in time, in order for a dealer to obtain an ETM the Tech Hotline had to be contacted. This has resulted in a large number of the Included Tech Hotline reports.</i>	
c. Claims involving a crash	1
Claims involving an injury	1
d. Notices involving a crash	0
Notices involving an injury	0
e. Property damage claims	0
f. Third-party arbitration proceedings	0
g. Lawsuits	0
h. Proceedings involving government agencies	0

In addition, for items "c" through "e" 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" through "h" identify the parties to the action, as well as the caption, court, docket number, or file number, and date on which the complaint or other document initiating the action was filed.

a. Consumer Reports. Customer Care System. Injury: 1. Crash: 1.  
VIN: YV1TS97D5X [REDACTED] Vehicle: S80 2.9. Customer: Naiztet.

Summary description of the alleged problem

- Customer alleges that ETM malfunction adversely influenced engine performance. Customer states that "while pulling out of a space in parking lot, vehicle was hit in the front. Customer states "had throttle replaced three times and cleaned...always had problems with vehicle not running properly".
- DTC code ECM 928C was set. Inspection by Volvo technical representative found no out of line conditions with the vehicle.

Causal and contributing factors

- The alleged symptom from customer is not in line with stated DTC, denied cruise control activation.
- Volvo cannot redo the technical inspection of the vehicle to reconcile the customer's allegation with the read DTC. Therefore, Volvo cannot comment further on this case.

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:

- Volvo's file number or other identifier used;
- The category of the item, as identified in Request No. 2 (i.e., consumer complaint, field report, etc.);
- Vehicle owner or fleet name (and fleet contact person), address, and telephone number;
- Vehicle's VIN;
- Vehicle's make, model, engine and model year;
- Vehicle's mileage at time of incident;
- Incident date;
- Report or claim date;
- Whether a crash is alleged;
- 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 DATA." See Enclosure 1, Data Collection Disc, for a preformatted table which provides further details regarding this submission.

*Refer to CD-ROM, enclosed. After a thorough and diligent effort we have been unable to produce certain information in certain fields, such as the mileage or VIN for certain specific Customer Care records.*

- 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.) Describe the method Volvo used for organizing the documents.

*Refer to hardcopies of letters associated with Customer Care records, enclosed.*

- 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 alimiar 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. 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 which provides further details regarding this submission.

*Refer to CD-ROM, enclosed. All applicable warranty data for the MY2002 C70 is provided. Warranty data for the remaining subject vehicles has been updated from the PE submission to include records from August through December 2005.*

*Any blank fields seen within this section of the database are seen because the vehicle owner or the dealer has not provided certain information. After a thorough and diligent effort we have been unable to produce this information.*

- 6. Provide monthly updates of the warranty data requested in Item 5 with summaries of the status of Volvo's Special Policy Program for the subject vehicles (i.e., for each update, state the number of owner letters sent to date by model, model year and engine with requested electronic update of warranty claim information).

Volvo will send the first of the monthly updates on approximately March 1, 2006. This report shall be updated with the requested information through the February 25, 2006 (the closing date for each month is the 25<sup>th</sup> of the month.).

7. 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. 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). Describe any extended warranty coverage option(s) that Volvo 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.

Warranty claims related to the alleged defect of this EA were provided in response to PE05-050. Therefore, these reports have been updated to include reports from August through December 2005. The search criteria used by Volvo to identify the claims identified under the new car warranty was to find any claim associated with any of the following part numbers:

Software:

8633202
8633203
8633204
8641987
8644182
8644194
8644195
8645425
8675890
9438290
9438298
9438425
9484714
30677001
30677007
30677023

Throttle Body

8644344
8644347
9186793
9451987

Cleaning:

25121  
02520

*Volvo coverage under the New Car Warranty in the USA is four years or 50,000 miles, whichever occurs first. In addition, in California, Massachusetts and Vermont, the high cost emission component warranty is 7 years or 70,000 miles, whichever comes first. Vermont adopted this starting MY2000. The "Electronic Throttle Module" is covered under the high cost emission component warranty.*

- 8. Produce copies of all service, warranty, and other documents that relate to, or may relate to, the alleged defect in the subject 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.**

*Volvo is providing copies of the above referenced documents to NHTSA as they are issued.*

**14. Provide the following for ODI's use during EA05-021:**

- o Two ETMs (Part Number 8644347); and
- o One compact throttle tester as described in the Action Plan of 00-03-022.

*Two ETMs have been sent to NHTSA per the above request.*

*Since the compact throttle tester referenced above is not available Volvo is working diligently with Stephen McHenry for a suitable alternate to providing this to NHTSA.*

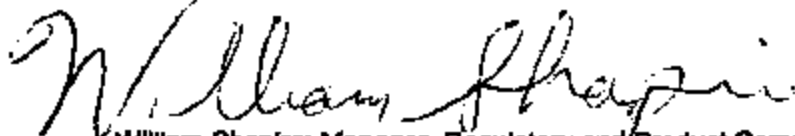
- 16. State the number of subject components that Volvo has sold for use in the subject vehicles by component name, part number (both service and engineering/production), model, model year, and engine of the vehicles in which it is used and month/year of sale (including the cut-off date for sales, if 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 model, model year and engine, all 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.**

*The sales data has been updated on the enclosed CD-ROM for August through December 2005.*

Please contact myself or D. Liggett if you have any questions concerning the above.

Sincerely yours,

VOLVO CARS OF NORTH AMERICA, LLC  
Customer Service Division



William Shapiro, Manager, Regulatory and Product Compliance

Enclosures: CD-ROM, Customer Care Letters.