

# **VOLVO**

**Volvo Cars of North America, LLC**

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-212Ihs  
PE05-064

Feb. 28, 2006

Dear Mr. Cooper:

This letter and its enclosures comprise second part of a two part response of Volvo Cars of North America, LLC (VCNA) to your request for Information relating to Preliminary Evaluation PE05-064 received on December 13, 2005 to investigate concerns involving the windshield wiper system installed in certain Volvo vehicles.

In order to respond to PE05-064, 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 the alleged loosening of the retaining nut that secures the windshield wiper arm to its drive shaft, which may ultimately cause impairment of driver visibility in inclement weather conditions on MY2004 and 2005 Volvo XC90 vehicles. 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 the remaining 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 December 13, 2005 when our search began for this information.

9. Describe all modifications or changes made by, or on behalf of, Volvo in the design, material composition, manufacture, quality control, supply, or installation of the subject components, from the start of production to date, which relate, 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;

The reason(s) for the modification or change;

The part numbers (service and engineering) of the original component;

The part number (service and engineering) of the modified component;

Whether the original unmodified component was withdrawn from production and/or sale, and if so, when;

When the modified component was made available as a service component; and,

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.

*The above information is provided on the enclosed CD-ROM.*

10. Provide a complete engineering description and appropriate engineering specifications of the subject components installed in the subject vehicles. 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, equipped with identical subject components as the subject vehicles, whether installed in production or in service, and state the applicable dates of production or service usage.

*This information is provided on the enclosed CD-ROM.*

11. Provide Volvo's assessment of the alleged defect in the subject vehicle, including:
- The causal or contributory factor(s);
- The failure mechanism(s);
- The failure mode(s);
- The risk to motor vehicle safety that it poses; 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, The reports included with this inquiry.