



Volvo Cars of North America, LLC

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2007 JAN 25 A 10:00

January 24, 2007

OFFICE OF DEFECTS INVESTIGATION
NHTSA

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

NVS-212.PCO
PE06-053

This letter and its enclosures comprise the partial response of Volvo Cars of North America, LLC (VCNA) to your November 28, 2006 request for information relating to Preliminary Evaluation PE06-053. Enclosed is the information which was available to Volvo as of January 22, 2007. We have responded to Request number 1 through 6 in this response.

We have provided below and as separate enclosures (a combination of hardcopy and electronic documents) the answers to the questions raised by PE06-053. We have used the documentation and systems available to us that, in the normal course of business, contain the type of information relevant to this request. Please note that for the purpose of PE06-053 we are using data up through and including November 28, 2006; which is the date on which we began our search for this information.

In order to respond to the requests within PE06-053, Volvo, 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 within the body of the response letter, by model and model year, the total 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:
 - a. Make;
 - b. Model;
 - c. Model Year;
 - d. Vehicle identification number (VIN);
 - e. Date of manufacture (in "yyyy/mm/dd" date format);
 - f. Date warranty coverage commenced (in "yyyy/mm/dd" date format) or "Unsold" if not sold; and
 - g. The State in the United States where the vehicle was originally sold or leased (or delivered for sale or lease).

Provide this table in Microsoft Access 2000, or a compatible format, entitled "PRODUCTION DATA."

Volvo Response to Question 1:

The chart below describes the number of "Subject vehicles" Volvo has produced for sale or lease in the United States. Detailed information containing the responses Questions 1a – 1g can be found on the attached CD-ROM in the Microsoft Access database named "Volvo PE06-053" within the table entitled "Production Data". The following abbreviations are used in the table:

DOB = Date of Build

WSD = Warranty Start Date

When available, the state in which the vehicle was originally sold has been populated.

Information related to vehicle production is maintained and has been extracted from Volvo's "QW90" database

<i>Make</i>	<i>Model</i>	<i>Model Year</i>	<i># of Vehicles Produced</i>
<i>Volvo</i>	<i>S60</i>	<i>2001</i>	<i>37,637</i>
<i>Volvo</i>	<i>S60</i>	<i>2002</i>	<i>45,029</i>
<i>Volvo</i>	<i>S60</i>	<i>2003</i>	<i>22,333</i>
<i>Volvo</i>	<i>S60</i>	<i>2004</i>	<i>47,574</i>
<i>Volvo</i>	<i>S60</i>	<i>2005</i>	<i>25,254</i>
<i>Volvo</i>	<i>S60</i>	<i>2006</i>	<i>28,175</i>
<i>Volvo</i>	<i>S60</i>	<i>2007</i>	<i>12,898*</i>

** Indicates count of vehicle production up to and including December 4, 2006*

2. State within the body of the response letter, 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;
 - c. Property damage claims; and
 - d. Third-party arbitration proceedings where Volvo is or was a party to the arbitration; and
 - e. 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). Identify reports that have a duplicate with either other mfg reports/claims or with ODI

In addition, for subparts "d" through "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.

Volvo Response to Question 2:

In order to identify reports or incidents which may be related to the alleged defect, Volvo collected information from databases where, in the normal course of business, the information is collected and maintained. Below is a summary of each data source followed by the number of records Volvo is aware of. Additional data can be found on the enclosed CD-ROM within the Access Database titled "Volvo PE06-053", table named "Request Number Two Data"

<u>Request</u>	<u>Count</u>
a. Consumer Complaints – "Customer Care"	18
b. Field Reports –	
"TIE" (Manufacturer)	0
"Tech Hotline" (Dealer)	8
c. Reports involving a crash, injury, or fatality based on:	
Claims - involving a death or injury	0
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:	0
d. Property damage claims	0
e. Third-party arbitration proceedings	0
f. Lawsuits	0

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 (in "yyyy/mm/dd" date format);
 - h. Report or claim date (in "yyyy/mm/dd" date format);
 - i. Whether a crash or fire is alleged;
 - j. Whether property damage is alleged

- k. Number of alleged injuries, if any;
- l. Number of alleged fatalities, if any;
- m. Alleged component involved (fuel pump, level sensor, hoses etc ...); and n. Alleged issue (fuel leakage or fuel odor).

Provide this information in Microsoft Access 2000, or a compatible format, entitled "*Request Number Two Data*"

Volvo Response to Question 3:

Volvo's data in response to this request can be found on the enclosed CD-ROM within the Microsoft Access database entitled "Volvo PE06-053" within the table named "Question_two_data". In records where "vehicle mileage" is blank this indicates that it was not available in the document

- 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 Volvo used for organizing the documents.

Volvo Response to Question 4

*Electronic copies of each document included in Volvos response to Request No.2 can be found on the enclosed CD-ROM within the folder entitled "Question 4 – Volvo Response"
A sub-folder for each type of data (i.e., Field report, Customer Complaint, etc.) has been created, the name for each file is also Volvo's "Unique" file number (source system record number)*

- 5. State within the body of the response letter, 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's claim number;
- b. Vehicle owner or fleet name (and fleet contact person) and telephone number;
- c. VIN;
- d. Repair date (in "dd/mm/yyyy" date format);
- 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"

Volvo Response to Question 5:

The following table is a summary describing "total count" of "claims" listed by model and model year. Additional detailed data may be found on the enclosed CD-ROM, within the Microsoft Access Database table named "Warranty"

<i>Make</i>	<i>Model</i>	<i>Model Year</i>	<i>Count</i>
Volvo	S60	2001	373
Volvo	S60	2002	251
Volvo	S60	2003	62
Volvo	S60	2004	35
Volvo	S60	2005	57
Volvo	S60	2006	34
Volvo	S60	2007	1

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. State, by make and model year, the terms of the new vehicle warranty coverage (including the subject component) 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.

Volvo Response to Question 6:

In order to respond to Request No. 5, Volvo utilized the "QW90" Warranty system, the search criteria used was a combination of "Part Numbers" and "Labor Operation Codes" that were applicable to the alleged defect at the time of this response. An Excel document named "Response to Question 6" has been added to the attached CD-ROM containing separate worksheets titled "Labor Operation codes" and "Part Numbers". This spreadsheet contains the list of Part numbers and Labor Operation codes used to search for the responses to Request No. 5.

Reports that contained relevant part numbers were retrieved, and then a search of labor operation codes applicable to the alleged defect was performed.

It is important to note that "Warranty Claim" text is authored by non-technical retailer employees.

The following information describes in detail, the terms of the warranty coverage offered by Volvo for the subject vehicles.

New Car Limited Warranty – U.S.

PARAMETERS/WARRANTY COVERAGE

The Volvo New Car Limited Warranty-U.S. and New Car Warranty - Canada applies to new Volvo passenger cars used for non-commercial purposes (i.e., personal/family use). The vehicle must have been originally invoiced and wholesaled by Volvo Cars of North America, Inc., and registered and normally operated in any of the 50 states of the U.S., the District of Columbia, or any of the provinces of Canada.

NEW VEHICLES

Coverage

4 years/50,000 miles/80,000 Kilometers, whichever occurs first

Warranty Start Date

The warranty starts on the date the vehicle is sold /delivered to the first retail purchaser or put into service. Any remaining portion of the warranty is fully transferable to subsequent owners free of charge.

RETAILER DEMONSTRATOR VEHICLES

Coverage

Vehicles placed into retailer demonstrator or loaner service will receive the remainder of the New Car Limited Warranty period when retailed.

It is the selling retailer's responsibility to advise the first retail purchaser of the date the demonstrator was placed into service and the remaining New Car Warranty coverage.

Warranty Start Date

While used as a retailer demonstrator or loaner vehicle, the applicable New Car Warranty begins only if the retailer registers the vehicle with Volvo. If a demonstrator vehicle is not registered, warranty claims cannot be processed for credit.

**COMMERCIAL VEHICLES
Coverage**

Vehicles used for commercial purposes (i.e., taxi, police, etc.) are covered during the New Car Limited Warranty for one (1) year or 15,000 miles/24,000 kilometers, whichever occurs first. However, all other warranties applicable (i.e., Seat belt/SRS, Emission, etc.) to the model year vehicles also apply to commercial vehicles.

If you have any questions, please do not hesitate to contact me, or Adam Kopstein of my Staff.

Sincerely yours,

VOLVO CARS OF NORTH AMERICA, LLC
Customer Service



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

Enclosure: CD-ROM