# **VOLKSWAGEN**

GROUP OF AMERICA

Jeffrey Quandt
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CHRISTOPHER T. SANDVIG NAME

GM – COMPLIANCE / TREAD TITLE

PRODUCT COMPLIANCE DEPARTMENT

248-754-5000 PHONE

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SEPTEMBER 30, 2011 DATE

Subject: PE11-023 - Allegations of Fuel Leakage from Fuel Rail Assemblies - NVS-213hkb

VOLKSWAGEN GROUP OF AMERICA, INC. 3800 HAMLIN ROAD AUBURN HILLS, MI 48326 PHONE +1 248 754 5000

Dear Mr. Quandt:

Please find attached Volkswagen's partial response to your letter dated August 17, 2011 requesting information concerning fuel leakage from the common rail assembly, including all associated injector lines, injectors and fittings, on 2011 MY Volkswagen Jetta vehicles equipped with the TDI Clean Diesel engine.

Per your request, the enclosed information is inclusive of 2009-2011 MY Volkswagen and Audi vehicles equipped with the TDI Clean Diesel engine (Volkswagen Jetta, Volkswagen Golf and Audi A3) manufactured and sold to Volkswagen Group of America, Inc. for resale or lease in the United States.

Volkswagen's response to Questions 1-5 contained within PE11-023, is forwarded in conjunction with Volkswagen's Notification of Voluntary Recall, 2009 – 2012 MY Volkswagen Jetta, 2010 – 2012 MY Volkswagen Golf and Audi A3 - Diesel Fuel Injection Lines, per our phone conversation of Monday, September 26, 2011.

For your convenience, each request is restated verbatim and then followed by our response.

Please contact me if you have any questions regarding this response.

Sincerely,

Christopher T. Sandvig

General Manager - Compliance/TREAD

Service and Quality

Attachments

State, by model and model year, the number of subject and peer vehicles VW has manufactured for sale or lease in the United States. Separately, for each subject and peer vehicle manufactured to date by VW, state the following:

- a. Vehicle identification number (VIN);
- b. Make;
- c. Model;
- d. Model Year;
- e. Date of manufacture;
- f. Date warranty coverage commenced; and
- g. The State in the United States where the vehicle was originally sold or leased (or delivered for sale or lease).

Provide the table in Microsoft Access 2000, or a compatible format, entitled "PRODUCTION DATA." See Enclosure 1, Data Collection.

### Response 1

In response to your inquiry, Volkswagen has identified the following number of 2009-2011 Model Year (MY) Jetta, 2010-2011 MY Golf and 2010-2011 MY Audi A3 vehicles manufactured and sold to Volkswagen Group of America, Inc. for resale or lease in the United States that were equipped with a TDI Clean Diesel engine:

Subject Vehicles	MY 2009	MY 2010	MY 2011
VW Jetta	37,889	53,088	42,477
VW Golf	-	4,446	9,068
Audi A3	-	2,180	3,791

Please see Microsoft Excel file entitled "PRODUCTION DATA.xlsx" for responses to subparagraphs a) through g), in the folder attached hereto as Exhibit to Request 1.

Source: Business Objects Vehicles Universe

Date Gathered: Through September 30, 2011

Data is provided labeled as "PRODUCTION DATA.xlsx" in Microsoft Excel format in the Exhibit to Request 1 folder on the PE11-023 Data Collection Disc

State the number of each of the following, received by VW, or of which VW is otherwise aware, which relate to, or may relate to, the alleged defect in the subject and peer 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. Property damage claims;
- e. Third-party arbitration proceedings where VW is or was a party to the arbitration; and
- f. Lawsuits, both pending and closed, in which VW 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 "f," provide a summary description of the alleged problem and causal and contributing factors and VW'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.

#### Response 2

Volkswagen notes that the following responses to subparagraphs "a" through "f" include multiple reporting about the same underlying incident; these counts may not be added together because a false total count would result.

- a) In response to this inquiry, Volkswagen has identified 5 consumer complaints involving an injector fuel line related to the alleged defect in the subject vehicles.
- b) In response to this inquiry, Volkswagen has identified 91 field reports involving an injector fuel line related to the alleged defect in the subject vehicles
- c) In response to this inquiry, Volkswagen has not received any 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) In response to this inquiry, Volkswagen has not identified any property damage claims.
- e) In response to this inquiry, Volkswagen has not identified any third-party arbitration proceedings where VW is or was a party to the arbitration.
- f) In response to this inquiry, Volkswagen has not identified any lawsuits, pending or closed, in which VW is or was a defendant or codefendant.

Source: Business LISTEN, PL, FRED, TACS

Date Gathered: Through the date of the inquiry

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. VW'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 property damage is alleged;
- k. Number of alleged injuries, if any; and
- 1. 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 pre-formatted table which provides further details regarding this submission.

#### Response 3

Responses to subparagraphs a) through l) is provided in the document entitled, REQUEST NUMBER TWO DATA.xlsx in the folder attached hereto as Exhibit to Request 3. These cases are organized by category then by case number.

Source, Date Gathered: See Response 2

Data is provided labeled as "REQUEST NUMBER TWO DATA.xlsx" in Microsoft Excel format in the Exhibit to Request 3 folder on the PE11-023 Data Collection Disc

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 VW used for organizing the documents.

### Response 4

In response to this inquiry, Volkswagen is providing copies of documents identified for each item in Response 2. The documents are provided in Adobe Acrobat format, entitled "REQUEST NUMBER FOUR DATA.pdf", in the folder attached hereto as Exhibit to Request 4. The cases are organized by category, then by case number.

Source, Date Gathered: See Response 2

Data is provided labeled as "REQUEST NUMBER FOUR DATA.pdf" in Adobe Acrobat format in the Exhibit to Request 4 folder on the PE11-023 Data Collection Disc

State, by model and model year, a total count for all of the following categories of claims, collectively, that have been paid by VW to date that relate to, or may relate to, the alleged defect in the subject and peer 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. VW'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.

#### Response 5

In response to this inquiry, Volkswagen has identified 434 warranty claims (433 unique VINs) involving injector fuel line #2 related to the alleged defect in the subject vehicles. Volkswagen notes that 8 of these claims are duplicative of the provided VOQs; 5 are duplicative of consumer complaints and 61 are duplicative of field reports.

Volkswagen notes that in some cases the warranty claim administrator's interpretation of technician comments may state other fuel related components were replaced, however in all claims attached, it is the injector fuel line #2 that has been replaced (based on replacement part number).

Information for these claims is provided in Microsoft Excel format, entitled "WARRANTY DATA.xlsx", in the folder attached hereto as Exhibit to Request 5. The claims are organized by claim number.

Source: Business Objects Warranty Claims Universe Date Gathered: Through the date of the inquiry

Data is provided labeled as "WARRANTY DATA.xlsx" in Microsoft Excel format in the Exhibit to Request 5 folder on the PE11-023 Data Collection Disc.