VOLKSWAGEN OFFICE OF DEFECTS & INVESTIGATIONS

GROUP OF AMERICA

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Christopher T. Sandvig NAME

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Product Compliance Department

248-754-5000 Phone 248-754-5093 Fax

January 30, 2014 Date

Chief, Vehicle Integrity Division

1200 New Jersey Avenue S.E.

Subject: PE13-036 /Tiguan

Washington, DC 20590

U.S. Department of Transportation

National Highway Traffic Safety Administration

Dear Mr. Yon:

Scott Yon

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

Please find attached Volkswagen's response to PE13-036, dated November 04, 2013, in which the problem description "alleges a partial or complete loss of the exterior lights (e.g., headlights, brake lights, turn signal lights, etc.) due to a heat damaged electrical fuse" on certain MY 2009 through MY 2011 Volkswagen Tiguan vehicles.

Pursuant to the email request received from Mr. Michael Lee dated November 27, 2013, Volkswagen is providing information relating to population and counts for consumer complaints, field reports and warranty claims (not the underlying data or copies of documents). Additionally, Volkswagen has identified other models of Volkswagen that use the subject F16/SB16 fuse and fuse box

Thank you for your consideration in granting our requested extension, pursuant to the email communication received from Mr. Michael Lee on December 18, 2013.

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

Pursuant to your January 30, 2014 format request, Volkswagen provides the attached document in response to PE13-036, in compliance with your request.

Sincerely,

Christopher T. Sandvig

General Manager - Compliance/TREAD

Attachment

1. Number of subject vehicles produced by model year.

In response to this inquiry, Volkswagen has identified the following number of MY 2009 through MY 2011 Volkswagen Tiguan vehicles manufactured and sold to Volkswagen Group of America, Inc. for resale or lease in the United States, including "states" as defined in 49 U.S.C. 30102(a)(10), that use subject F16/SB16 fuse and fuse box:

MODEL	2009MY	2010MY	2011MY	Total
Tiguan	19,077	17,460	25,618	62,155

2. Number of consumer complaints and field reports (separately) by model year.

Volkswagen notes that the following response to Consumer Complaint and Field Report request may include multiple reporting about the same underlying incident; therefore, the counts provided are not additive. Stated counts are cumulative through December 15, 2013

Consumer Complaints

Model	2009MY	2010MY	2011MY	Total
Tiguan	64	31	56	151

Field Reports

Model	2009MY	2010MY	2011MY	Total
Tiguan	92	51	106	249

3. Number of crashes, fires, injuries and/or deaths.

Volkswagen has not received any reports involving a crash, fire, 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 alleged defect in the subject vehicles.

4. Number of warranty claims by model year and a brief description of how these were selected/identified.

Warranty Claims

Model	2009MY	2010MY	2011MY	Total
Tiguan	987	980	2,680	4,647

The Volkswagen warranty database was queried for all paid warranty claims in which the F16/SB16 fuse and/or fuse box was replaced.

The F16/SB116 fuse/fuse box part number suffix was substituted with a 'wild card', in order to obtain all variations (where applicable) of the fuse/fuse box applicable to 2009 MY – 2011 MY Volkswagen Tiguan. The part numbers used in the query:

Fuse:

N01713124 / N01713125

Fuse box:

1K0-937-125-*

Warranty claims were then screened (read) to determine if the repair/replacement met the problem description as stated in PE13-036:

"Complaints allege a partial or complete loss of the exterior lights (e.g., headlights, brake lights, turn signal lights, etc.) due to a heat-damaged electrical fuse."

5. Number of subject F16/SB16 fuses and fuse boxes sold for use as service parts on subject vehicles.

Volkswagen notes that the part numbers listed below are also used in vehicles other than 2009 MY – 2011 MY Tiguan.

Part Sales

Part Number	Total
1K0937125A – Fuse box	4,137
1K0937125D – Fuse box	11,773
N 01713124 – Fuse	62,097
N 01713125 – Fuse	30,039

Sold for use as service parts on subject vehicles (based on warranty claims)

Part Number	2009MY	2010MY	2011MY	Total
1K0937125 - Fuse box			1	1
1K0937125A - Fuse box	480	1		481
1K0937125D - Fuse box	481	971	2,661	4,113
N 01713124 - Fuse	25	7	4	36
N 01713125 – Fuse	1	1	14	16

6. List of all other U.S. Volkswagen models that use subject F16/SB16 fuse and fuse box.

Volkswagen notes that the subject fuse box (P/N 1K0-937-125-*) was used in various models. However, prior to the 2009 model year, the F16 fused circuit was not used for powering exterior lighting. With the implementation of Electronic Stability Program (ESP), the F16 fused circuit was redesigned to provide one branch of the exterior lighting power supply.

Vehicles utilizing the subject fuse box (P/N 1K0-937-125-*) prior to the introduction of ESP, are not subject to the possible loss of illumination condition.

The following models contain the subject component with one branch of the exterior light circuit applied to the F16 fuse:

- 2009-2014 Eos
- 2009-2010 Jetta (A5 generation)
- 2010-2014 Jetta SportWagen (A6 generation)
- 2009-2014 Golf/GTI
- 2009-2011 Tiguan

Volkswagen notes that for each of the vehicles listed above, the subject fuse box is <u>not applicable</u> to every vehicle within the model line. Dependent on the powertrain application, a different fuse box may be used.

7. List of all individual exterior lights that are lost when defect condition occurs.

2009 MY Tiguan

Right Front: low beam, high beam, turn signal, fog light (if equipped)

Left Front: position light, side marker

Right Rear: outer tail light¹, outer halo & turn signal, backup light

Inner tail light: inner halo and lid portion go to 100% brightness (equals brake light intensity)

Left Rear: outer tail light¹, inner halo, inner tail light

Outer tail light: outer halo goes to 100% brightness (equals brake light intensity)

2010-2011 MY Tiguan

Right Front: low beam, high beam, turn signal, fog light (if equipped)

Left Front: position light, side marker

Right Rear: outer tail light²: outer halo, backup light

Left Rear: outer tail light: inner halo, inner tail light, turn signal

Other: CHMSL, License Plate Light

outer tail light = part of taillight in fender, inner tail light = part of taillight on rear lid outer tail light = part of taillight in fender, inner tail light = part of taillight on rear lid

8. Brief description of new fuse type/material used and reason for the change.

The fuse remains the same 30A green colored flat fuse type, but the connection tab surface coating was modified.

Previous fuse connection tabs were plated with tin. The tin coating could get abraded due to thermal cycling and dilation, exposing the underlying zinc. Oxidation of the zinc caused increased connection resistance leading to heat generation at the fuse tab. As a result, the plastic housing material could melt, potentially allowing the fuse to lose electrical connection – leading to a deactivation of the affected light circuit (partial loss of illumination).

The new fuse contains a modified coating on the tab surface, comprised of silver rather than tin, which provides an increased hardness that is strong enough to resist movement caused by dilation of the fuse socket, without showing abrasion of the coating.