

VOLKSWAGEN

GROUP OF AMERICA

OFFICE OF CHIEF COUNSEL
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Paul Hemmersbaugh, Acting Chief Counsel
Office of Chief Counsel
National Highway Traffic Safety Administration
West Building, W41-326
1200 New Jersey Avenue S.E.
Washington D.C. 20590

Christopher T. Sandvig NAME
General Manager Title
Group Customer Protection Department
248-754-5000 Phone
248-754-5093 Fax
December 01, 2015 Date

Re: EA15-001 Air Bag Inflator Rupture
Special Order Directed To Volkswagen Group of America, Inc.

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

Dear Mr. Hemmersbaugh:

Please find attached Volkswagen's December 01, 2015 supplemental response to the Special Order Directed To Volkswagen Group of America, Inc., in reference to EA15-001, Air Bag Inflator Rupture, requesting information concerning a SSI-20 air bag inflator rupture in a 2015 MY Volkswagen Tiguan, on June 7, 2015, as reported to the agency on July 15, 2015.

Volkswagen will continue to meet the requirement for 30 day supplemental submissions as outlined in the Special Order.

Per the Special Order direction, each request is restated verbatim and followed by our response.

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

Sincerely,



Christopher T. Sandvig
General Manager, Group Customer Protection
Volkswagen Group of America, Inc.

Enclosures

The following constitutes supplemental Volkswagen Group responses to the Department of Transportation, National Highway Traffic Safety Administration.

SPECIAL ORDER DIRECTED TO VOLKSWAGEN GROUP OF AMERICA, INC.

In re: EA 15-001 (Formerly PE14-01(6) Air Bag Inflator Rupture, Dated August 13, 2015 and Received by Volkswagen AG on Monday, August 17, 2015.

Most of the information required to respond to this special order is in the possession of or can only be secured with the technical and logistical assistance of Volkswagen AG in Wolfsburg, Germany.

Volkswagen will continue to meet the requirement for 30 day supplemental submissions as outlined in the Special Order.

Volkswagen restates the request and follows with its response.

1. Provide a detailed, narrative explanation, including a timeline of events and knowledge, and supporting documentation (including police reports), of your understanding of the SSI-20 air bag inflator rupture in the Volkswagen Tiguan on or about June 7, 2015.

Response 1

No additional information available in response to Request 1.

2. Provide a detailed, narrative explanation, including a timeline of events and knowledge, and supporting documentation (including police reports), of your understanding of any confirmed or alleged SSI-20 air bag inflator rupture in any Volkswagen vehicle (other than the incident identified in Request No. 1), or during any Volkswagen testing, including testing conducted by any third party on behalf of, or at the direction of, Volkswagen.

Response 2

Volkswagen has not identified nor has been informed of any alleged or confirmed SSI-20 air bag inflator rupture events beyond those previously reported. The following chronology relates to the ongoing analysis of SSI-20 inflators.

Friday, October 23, 2015

Internal management summary regarding the ongoing SSI-20 analysis. Investigation is now concentrated on ceramic cushions inside the inflator as potential cause.

[refer to document: 20151023_VW20151023_r12]

Wednesday, October 28, 2015

Internal communication about implementation of additional analysis plan for Shanghai inflators. Definition of analysis steps.

[refer to document: 20151028_Untersuchungsplan; 20151029_TestplanVW_Lot15090B01]

Friday, October 30, 2015

Takata update about SSI-20 analysis. Update confirms that no additional LAT failures have occurred. Takata states that blocked ceramic cushion hole cannot be the sole cause of an inflator failure. However, process optimizations were implemented to prevent blocking of the ceramic cushion hole.

[refer to document: 20151030_SSI20_Weeklyupdate]

Wednesday, November 4, 2015

Definition of test steps for field return parts

[refer to document: 20151104_ErstBewertungskriterien in CT]

Management summary shows that to date it was not possible to define a root cause for the failed SSI-20 inflators. The summary also reports that there is a potential issue with ceramic cushion which was addressed by Takata in early 2011.

[refer to document: 20151104_201510-Takata SAB V2]

Friday, November 6, 2015

Takata update about SSI-20 analysis. Update confirms non-occurrence of additional LAT failures. Takata show analysis plan for parts from blocked lots and provides additional test result regarding crush strength of propellant tablets.

[refer to document: 20151106_SSI20_Weeklyupdate]

Identification of airbags modules blocked in China after an LAT failure.

[refer to document: 20151106_Module IDs China]

Monday, November 9, 2015

Identification of airbag modules from the Tiguan incident lot in other vehicles.

[refer to document: 20151109_WG VW_ModuleID.xlsx]

Monday, November 9, through Friday, November 13, 2015

First results from analysis of field return parts and additional tests planned

[refer to documents: 20151109_Messung_600GG-zu-VW, 20151113_Gesamt-Auswertung SA, 20151113>Weitere Vorgehensweise Prüfung Schwesterteile]

Information has been acquired and reviewed through Tuesday, November 17, 2015, in preparation of Volkswagen's December 01, 2015 supplemental response.

3. Other than as previously disclosed in response to Requests No. 1 and 2 above, provide a detailed, narrative explanation, including a timeline of events and knowledge, and supporting documentation (including police reports), regarding any confirmed or alleged rupture of any air bag inflator in any Volkswagen vehicle.

Response 3

Volkswagen reconfirms it has not received any additional reports of an alleged or confirmed rupture of any air bag inflator in any Volkswagen vehicle since the November 01, 2015 supplemental response.

4. For each incident identified in your responses to Request Nos. 1 - 3, provide a copy of all documents that refer to, relate to, discuss, or concern Takata's assessment of the incident, and all documents that Volkswagen gathered as part of its investigation (including any police accident reports).

Response 4

All Takata related documents, in response to Request 2 are being provided in a folder entitled, "REQUEST NUMBER FOUR" on the enclosed disc.

Exhibit to Request 4

Data is provided in the specified file format in the REQUEST NUMBER FOUR folder on the Special Order Re: EA15-001 – Air Bag Inflator Rupture December 01, 2015
Volkswagen Group of America, Inc. Response Material

5. For each incident identified in your responses to Request Nos. 1 - 3, provide a copy of all documents that refer to, relate to, discuss, or concern Volkswagen's assessment of the incident, and all documents that Volkswagen gathered as part of its investigation (including any police accident reports), other than those already identified or provided in your response to Request No. 4.

Response 5

All Volkswagen related documents, in response to Request 2 are being provided in a folder entitled, "REQUEST NUMBER FIVE" on the enclosed disc.

A total of seven (7) records that are responsive herein to Request 4 were incorrectly processed and included in response to Request 5. An attempt to correct the files would have an adverse impact on the Bates numbering of all responsive documents; therefore, the affected files were left in Response 5 and are listed below for convenience:

Searchable DocID	BATESSTART	BATESEND	FILENAME	Request
0.7.203.119968	SSI20_0030574	SSI20_0030575	20151009_Kopie von Inflator Overview CBU VW - 20150701 SSI20 inkl. 2015 Schätzung.pdf	Req 4
0.7.203.119972	SSI20_0030576	SSI20_0030579	20151009_Kopie von Inflator Overview CBU VW - 20150701 SSI20 inkl. 2015 Schätzung.xlsx	Req 4
0.7.203.119970	SSI20_0030580	SSI20_0030588	20151014_2015_10_13_SSI-20_2004_Propellant_Tablet_Analysis_Modified_04 (3) (2).pdf	Req 4
0.7.203.119971	SSI20_0030589	SSI20_0030597	20151014_2015_10_13_SSI-20_2004_Propellant_Tablet_Analysis_Modified_04 (3) (2).pptx	Req 4
0.7.203.119969	SSI20_0030598	SSI20_0030613	20151030_SSI20_Weeklyupdate (2).pdf	Req 4
0.7.203.119973	SSI20_0030614	SSI20_0030629	20151030_SSI20_Weeklyupdate.pdf	Req 4
0.7.203.119967	SSI20_0030630	SSI20_0030643	20151106_SSI20_Weeklyupdate.pdf	Req 4

Exhibit to Request 5

Data is provided in the specified file format in the REQUEST NUMBER FIVE folder on the Special Order Re: EA15-001 – Air Bag Inflator Rupture December 01, 2015
Volkswagen Group of America, Inc. Response Material

6. For all side air bag inflators installed in any vehicle produced by Volkswagen, provide the Lot Acceptance Testing (LAT) failure rates, number of inflators that failed, and total number of inflators tested, for each inflator type broken down by LAT group. For any other type of testing conducted by Volkswagen, or by a third party on your behalf or at your direction, on side air bag inflators state what type of testing was conducted (including how a group or test category is defined) and the failure rates, number of inflators that failed, and total number of inflators tested.

Response 6

Volkswagen provides the updated internal Conformity of Production (CoP) testing regarding the SSI-20 side airbag inflator. The update now also reflects the CoP tests performed by Audi and Bentley. All tests were performed without any inflator rupture.

The updated table is provided in to response to Request 6.

Takata has provided a high level overview about their SSI-20 LAT testing figures. VWAG has added the 3 failed Volkswagen production LAT tests into the table, however, the information provided by Takata is not complete.

The updated table is provided in to response to Request 6.

Volkswagen has requested Takata to provide the Lot Acceptance Testing (LAT) failure rates, number of inflators that failed, and total number of inflators tested, for each inflator type broken down by LAT group on LAT test group level.

Volkswagen will provide an updated table as it becomes available with the next scheduled update.

7. Provide a list of all vehicles ever produced by Volkswagen that contained an air bag inflator that in any way utilized phase stabilized ammonium nitrate as a propellant. Include the vehicle model (M), vehicle model year (MY), total number of vehicles produced for each MMY identified in response to this Request, inflator supplier, and inflator type. Organize the information chronologically based on inflator supplier and type.

Response 7

Volkswagen is providing a table with current production volumes through November 28, 2015, related to air bag inflators which utilize phase stabilized ammonium nitrate. A complete overview is provided as Attachment to Response 7.

As 2016 Model Year US production information is updated by Volkswagen, it will be included in subsequent updates to the Special Order.