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September 26, 2017

Ms. Kara Fischer, Acting Chief
Recall Management Division
Office of Defects Investigation
National Highway Traffic Safety Administration (NHTSA)
1200 New Jersey Avenue SE
Washington, DC 20590

Reference: EQ17-002; NEF-107

Dear Ms. Fischer:

Attached is Continental's partial response to the above referenced Inquiry. Specifically, Continental is providing responses to Question 1 (a) through (g); Question 3 (a) through (d); and Question 4 (a) through (c).

As agreed, Continental will submit its response to the remaining Questions on or before October 9, 2017.

Sincerely,



Tammy L. Fanning

Attachments and Enclosures

ATTACHMENT

Preliminary Statement

In performing the analysis, reaching conclusions, and providing the information contained herein, Continental does not intend to waive any claim to attorney work product and attorney client privilege.

As a supplier, Continental is unable to specifically identify those fuel flanges that were ultimately installed in a vehicle that was sold in the US market. Therefore, the information contained in this Response, as well as the three Enclosures, is world-wide data.

As agreed with Scott Yon and Jeff Quant on September 20, 2017, Continental has defined "identical" fuel flanges as those with the same Continental "End Product Number."

1. Provide the following information for each of the subject components;

a. The OEM customer;
b. The vehicle applications by make, model, engine and model year, if known;
c. Continental's part number;
d. Material (POM) specification;
e. Photograph(s) (high definition) of the exterior surface(s);
f. Total number of flanges produced;
g. Total number of flanges with the alleged defect that have been returned to Continental for analysis; and
h. Copies of all documents containing field performance data or analyses related to the returned flanges and/or the alleged defect.

Answer 1(a) – See Enclosure 1, column B.

Answer 1(b) – See Enclosure 1, column C.

Answer 1(c) – See Enclosure 1, column E.

Answer 1(d) – See Enclosure 1, column F.

Answer 1(e) – See Enclosure 1, columns G and H.

Answer 1(f) – See Enclosure 1, column I.

Because the End Product Number for certain Volkswagen Touareg vehicles and certain Porsche Cayenne vehicles is the same number, Continental is unable to segregate the production and therefore, has provided the total production, which is 135,000.

Answer 1(g) – See Enclosure 1, Column J.

In addition, Continental provides the following information in response to 1(g).

Volkswagen Touareg: Continental has not received any fuel flanges for analysis.

Audi Q7: Continental has received a total of 58 fuel flanges. Thirty-two of these 58 were received as part of a routine quality assurance process and 27 of those 32 have been analyzed. The remaining 26 fuel flanges were received through the service campaigns associated with Recalls 16V-660 and 17V-298. Continental has analyzed all 26 fuel flanges.

Audi Q5: Continental has received a total of 78 fuel flanges. Six of these 78 were received as part of a routine quality assurance process and 4 of those 6 were analyzed. Sixty-one of the 78 fuel flanges were received through the service campaigns associated with Recalls 16V-660 and 17V-298 and 19 of those 61 have been analyzed. The remaining 11 fuel flanges were removed from vehicles outside of the US and provided to Continental for comparison purposes.

Porsche Macan: Continental has not received any fuel flanges for analysis.

Answer 1(h) – To be submitted on October 9, 2017.

The above response was compiled based upon information from Continental's Fuel & Engine Management Research & Development, Quality, and Sales groups. The last date the information was gathered was September 25, 2017.

2. Describe all assessments, analyses, tests, test results, studies, surveys, simulations, investigations, inquiries and/or evaluations (collectively "actions") that relate to, or may relate to, the alleged defect in the subject components that have been conducted, are being conducted, are planned, or are being planned by, or for, Continental. For each such action, provide the following information:

a. Action title or identifier;
b. The actual or planned start date;
c. The actual or expected end date;
d. Brief summary of the subject and objective of the action;
e. Engineering group(s) / supplier(s) responsible for designing and for conducting the action; and
f. A brief summary of the findings and/or conclusions resulting from the action.

For each action identified, provide copies of all documents related to the action, regardless of whether the documents are in the interim, draft, or final form. Organize the documents chronologically by action.

Answer 2 – To be submitted on October 9, 2017.

3. Provide the following information for all other fuel pump flanges with integrated fuel filters that have been manufactured by Continental with the same polymer material and production period as the subject components.

a. The OEM customer;
b. Continental's part number;
c. Material (POM) specification;
d. Photograph(s) (high definition) of the exterior surface(s);
e. Whether the flange is identical to any of the subject components;
f. For all parts not classified as identical to any of the subject components in the response to Request 3.e, provide a summary of the "application specific" differences with the subject components indicated in Continental's Part 573 Safety Recall Report for the subject equipment recall.

Answer 3(a) – See Enclosure 2, column B.

Answer 3(b) – See Enclosure 2, column E.

Answer 3(c) – See Enclosure 2, column F.

Answer 3(d) – See Enclosure 2, columns G and H.

Answer 3(e) – The only fuel flange that is identical to the subject components is identified in response to Question 4 (see Enclosure 3).

Answer 3(f) – To be submitted on October 9, 2017.

The above response was compiled based upon information from Continental's Fuel & Engine Management Research & Development, Quality, and Sales groups. The last date the information was gathered was September 25, 2017.

4. For all fuel pump flanges classified as identical to any of the subject components in the response to Request 3.e, provide the following additional information:

a. The vehicle applications by make, mode, engine and model year, if known;
b. Total number of flanges produced;
c. Total number of flanges with the alleged defect that have been returned to Continental for analysis; and
d. Copies of all documents containing field performance data or analyses related to the returned flanges and/or the alleged defect.

Answer 4(a) – See Enclosure 3, column B.

Answer 4(b) – See Enclosure 3, column G.

Answer 4(c) – See Enclosure 3, column H.

Answer 4(d) – To be submitted on October 9, 2017.

The above response was compiled based upon information from Continental's Fuel & Engine Management Research & Development, Quality, and Sales groups. The last date the information was gathered was September 25, 2017.

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