

VOLKSWAGEN

GROUP OF AMERICA

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Whitney

Greg Magno
Chief, Vehicle Defect Division A
Office of Defects Investigation
U.S. Department of Transportation
National Highway Traffic Safety Administration
1200 New Jersey Avenue S.E.
Washington, DC 20590

Christopher T. Sandvig NAME
Director Title
Group Customer Protection Department
248-754-5000 Phone
248-754-5093 Fax
January 16, 2018 Date

Subject: RQ17-009 NEF101sly

Dear Mr. Magno:

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

Please find attached Volkswagen's partial response to RQ17-009, dated November 15, 2017, requesting information concerning allegations of steering wheel clock spring/steering column control module (SCCM) covered by recall (15V-483) for the following subject vehicles: 2010-2014 Model Year (MY) CC and Passat, 2010-2013 MY Eos, 2011-2014 MY Golf, GTI, Jetta and Tiguan and 2012-2014 MY Jetta Sportwagen models.

Thank you for your approval of Volkswagens request of January 12, 2018 for a partial extension of time to respond to the Office of Defects Investigation (ODI) Information Request letter for RQ17-009 to February 9, 2018.

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
Director, Group Customer Protection
Volkswagen Group of America, Inc.

Enclosures

Request 1

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. Subject component part number and design version installed as original equipment;
- f. Date of manufacture;
- g. Date warranty coverage commenced; and
- h. 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 2010, or a compatible format, entitled "PRODUCTION DATA."

Response 1

In response to this inquiry, Volkswagen provides the population of subject vehicles covered by the subject recall (15V-483): 2010-2014 Model Year (MY) CC and Passat, 2010-2013 MY Eos, 2011-2014 MY Golf, GTI, Jetta and Tiguan and 2012-2014 MY Jetta Sportwagen vehicles manufactured for sale or lease in the United States, including, but not limited to, the District of Columbia and current U.S. territories and possessions.

Model / MY	2010	2011	2012	2013	2014	Total
CC	17,653	12,671	28,673	24,072	1	83,070
Eos	5,004	1,762	10,697	1,968		19,431
Golf/GTI/R		2,911	7,456	5,160	1	15,528
Jetta		6	8,575	7,375	3	15,959
Jetta Sportwagen			4,323	3,465	1	7,789
Passat (Germany)	11,197					11,197
Passat (USA)			92,670	95,280	73	188,023
Tiguan		24,608	28,699	21,516	4	74,827
Total	33,854	41,958	181,093	158,836	83	415,824

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

Source: Business Objects Vehicles Universe

Date Gathered: Through the date of the inquiry

Exhibit to Request 1

PRODUCTION DATA

Data is provided labeled as “PRODUCTION DATA.xlsx” in Microsoft Excel format in the Exhibit to Request 1 folder on the RQ17-009 Data Collection Disc

Request 2

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 vehicles:

- a. Consumer complaints, including those from fleet operators;
- b. Field reports, including dealer field reports;
- c. Reports involving a crash, injury, or fatality;
- d. Property damage claims;
- e. Third-party arbitration proceedings where VW is or was a party to the arbitration;
- f. Lawsuits, both pending and closed, in which VW is or was a defendant or codefendant.

For subparts "a" through "f" 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 "e" and "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.

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 326 consumer complaints related to the alleged defect in the subject vehicles;
- b. In response to this inquiry, Volkswagen has identified 219 field reports 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, or notices/claims of injury or death alleging or proving that a death or injury was caused by the alleged defect in the subject vehicles;
- 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 lawsuit, in which VW is or was a defendant or codefendant.

Source: LISTEN, PL, FRED, FTIS, ATA/VTA

Date Gathered: Through the date of the inquiry

Request 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. 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), street address, email 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;
- l. Number of alleged fatalities, if any.

Provide this information in Microsoft Access 2010, or a compatible format, entitled "REQUEST NUMBER TWO DATA."

Response 3

Responses to subparagraphs "a" through "l" are provided in a file entitled, REQUEST NUMBER TWO DATA.xlsx in the folder attached hereto as Exhibit to Request 3. Records are organized by case number then by category.

Source, Date Gathered: See Response 2

Exhibit to Request 3

REQUEST NUMBER TWO DATA

Data is provided labeled as "REQUEST NUMBER TWO DATA.xlsx" in Microsoft Excel format in the Exhibit to Request 3 folder on the RQ17-009 Data Collection Disc

Request 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 VW used for organizing the documents. Describe in detail the search methods and search criteria used by VW to identify the items in response to Request No. 2.

Response 4

In response to this inquiry, the following search criteria were used to identify items responsive to Request No. 2:

- Identify the population of subject vehicles covered by the subject recall (15V-483): 2010-2014 Model Year (MY) CC and Passat, 2010-2013 MY Eos, 2011-2014 MY Golf, GTI, Jetta and Tiguan and 2012-2014 MY Jetta Sportwagen vehicles manufactured for sale or lease in the United States, including, but not limited to, the District of Columbia and current U.S. territories and possessions.
- Identify applicable part numbers of the subject component used to affect repairs in the subject vehicles covered by the subject recall (15V-483).

The individual items were then manually screened to identify those which contained customer concerns related to the alleged defect, "Failure of the steering wheel clock spring/steering column control module (SCCM) potentially resulting in improper function steering wheel controls and/or failure of the driver front air bag to deploy in the event of a crash of sufficient severity to require a commanded deployment including a split deployment (i.e. non-deployment of driver's front air bag and deployment of passenger's front air bag).

Responsive documents to Request No. 2 subparagraphs "a" through "f" are provided in a file entitled, REQUEST NUMBER FOUR DOCUMENTS.pdf in the folder attached hereto as Exhibit to Request 4. Records are organized by case number then by category.

Source, Date Gathered: See Response 2

Exhibit to Request 4

REQUEST NUMBER FOUR DOCUMENTS

Data is provided labeled as "REQUEST NUMBER FOUR DOCUMENTS.pdf" in Adobe Acrobat format in the Exhibit to Request 4 folder on the RQ17-009 Data Collection Disc

Request 5

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 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), street address, email address and telephone number;
- c. VIN;
- d. Repair date;
- e. Recall Remedy Repair (Yes or No);
- f. Recall Remedy Performed (Shield or Module Replacement);
- g. Vehicle mileage at time of repair;
- h. Repairing dealer's or facility's name, telephone number, city and state or ZIP code;
- i. Labor operation number(s);
- j. Problem code(s);
- k. Diagnostic trouble code(s);
- l. Replacement part number(s) and description(s);
- m. Concern stated by customer;
- n. Cause as stated on the repair order;
- o. Correction as stated on the repair order;
- p. Additional comments, if any, by dealer/technician relating to claim and/or repair.

Provide this information in Microsoft Access 2010, or a compatible format, entitled "WARRANTY DATA."

Response 5

Volkswagen notes that the following response includes multiple reporting about the same underlying incident; these counts may not be added together because a false total count would result.

In response to this inquiry, Volkswagen has identified 270,359 unique recall / warranty claims on 268,229 unique vehicles related to the alleged defect in the subject vehicles. At the end of November 2017, the completion rate for recall 15V-483 was 80.99%. Volkswagen notes that 343 claims are duplicative of consumer complaints and 124 claims are duplicative of field reports.

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 Universe

Date Gathered: Through the date of the inquiry

Exhibit to Request 5

WARRANTY DATA

Data is provided labeled as "WARRANTY DATA.xlsx" in Microsoft Excel format in the Exhibit to Request 5 folder on the RQ17-009 Data Collection Disc

Request 6

Describe in detail the search criteria used by VW to identify the claims in response to Request No. 5, including the labor operations, problem codes, diagnostic trouble 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, diagnostic trouble codes and diagnostic trouble code descriptions applicable to the alleged defect in the subject vehicles. State whether the diagnostic trouble codes are automatically reported to the warranty database electronically or manually entered into the warranty database by a claims administrator.

State, by make and model year, the terms of the new vehicle warranty coverage offered by VW 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 VW 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.

Response 6

In order to respond to this inquiry, the following search criteria were used to search Warranty data to identify claims responsive to Request No. 5:

- Identify the population of subject vehicles covered by the subject recall (15V-483): 2010-2014 Model Year (MY) CC and Passat, 2010-2013 MY Eos, 2011-2014 MY Golf, GTI, Jetta and Tiguan and 2012-2014 MY Jetta Sportwagen vehicles manufactured for sale or lease in the United States, including, but not limited to, the District of Columbia and current U.S. territories and possessions.
- Identify claims in which the Clock Spring Cover (5K0953259%) service part was utilized to affect repairs in the subject vehicle
- Identify claims in which the Steering Wheel Clock Spring (5K0953569%) service part was utilized to affect repairs in the subject vehicle
- Identify the diagnostic trouble code(s) which indicate a fault in the airbag system as it relates to the steering wheel clock spring/steering column control module (SCCM):
 - B100001 – Driver airbag igniter: Resistance too high
 - VAG00588 – Driver side airbag igniter: Upper limit exceeded

The individual items were then manually screened to identify those which contained customer concerns related to the subject allegation of steering wheel clock spring/steering column control module (SCCM) failures potentially resulting in improper function of the driver air bag.

Diagnostic trouble codes are neither automatically nor manually entered into the warranty database. Diagnostic trouble codes, for each vehicle, retrieved on a case by case basis. There is no existing link between the warranty database and diagnostic trouble codes.

Response 6 cont'd.

Make	Model Year	Model	New Vehicle Limited Warranty	Extended Warranty
Volkswagen	2010-2014	CC	3 Years / 36,000 Miles	N/A
Volkswagen	2010-2013	Eos	3 Years / 36,000 Miles	N/A
Volkswagen	2011-2014	Golf/GTI/R	3 Years / 36,000 Miles	N/A
Volkswagen	2010-2013	Jetta	3 Years / 36,000 Miles	N/A
Volkswagen	2012-2013	Jetta Sportwagen	3 Years / 36,000 Miles	N/A
Volkswagen	2010-2014	Passat (USA/Germany)	3 Years / 36,000 Miles	N/A
Volkswagen	2011-2014	Tiguan	3 Years / 36,000 Miles	N/A

Source: VWGoA

Date Gathered: Through the date of the inquiry

Request 7

Produce copies of all service, warranty, and other documents that relate to, or may relate to, the alleged defect in the subject vehicles, that VW has issued to any dealers, regional or zone offices, field offices, fleet purchasers, or other entities. This includes, but is not limited to, bulletins, advisories, informational documents, training documents, or other documents or communications, with the exception of standard shop manuals. Also include the latest draft copy of any communication that VW is planning to issue within the next 120 days.

Response 7

Volkswagen includes a copy of the Safety Recall Circular 69L2 (NHTSA Code 15V-483) that VW issued to dealers, regional or zone offices, field offices, fleet purchasers, or other entities.

The responsive document to Request No. 7 is provided in a file entitled, REQUEST NUMBER SEVEN DOCUMENT.pdf in the folder attached hereto as Exhibit to Request 7.

Source: VWGoA

Date Gathered: Through the date of the inquiry

Exhibit to Request 7

REQUEST NUMBER SEVEN DOCUMENT

Document is provided labeled as "REQUEST NUMBER SEVEN DOCUMENT.pdf" in Adobe Acrobat format in the Exhibit to Request 7 folder on the RQ17-009 Data Collection Disc

Request 8

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 vehicles that have been conducted, are being conducted, are planned, or are being planned by, or for, VW. 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 interim, draft, or final form. Organize the documents chronologically by action.

Response 8

Volkswagen will provided its response to Request 8 on or before February 09, 2018.

Source: Volkswagen

Date Gathered: Through the date of the inquiry

Request 9

Describe all modifications or changes made by, or on behalf of, VW in the design, material composition, manufacture, quality control, supply, or installation of the subject component, from the start of production to date, which relate to, or may relate to, the alleged defect in the subject vehicles. For each such modification or change, provide the following information:

- a. The date or approximate date on which the modification or change was incorporated into vehicle production;
- b. A detailed description of the modification or change;
- c. The reason(s) for the modification or change;
- d. The part number(s) (service and engineering) of the original component;
- e. The part number(s) (service and engineering) of the modified component;
- f. Whether the original unmodified component was withdrawn from production and/or sale, and if so, when;
- g. When the modified component was made available as a service component; and
- h. Whether the modified component can be interchanged with earlier production components. Also, provide the above information for any modification or change that VW is aware of which may be incorporated into vehicle production within the next 120 days.

Response 9

Volkswagen will provided its response to Request 9 on or before February 09, 2018.

Source: Volkswagen

Date Gathered: Through the date of the inquiry

Request 10

Produce two of each of the following:

- a. Exemplar samples of each design version of the subject component;
- b. Field return samples of the subject component exhibiting the subject failure mode described in the alleged defect;
- c. Any subject components that have been released or developed by VW for use in service repairs to the subject component/assembly which relate or may relate to the alleged defect in the subject vehicles.

Response 10

Response to Request 10 subparagraphs "a" thru "c" is provided under separate cover.

Request 11

State the number of each of the following that VW has sold that may be used in the subject vehicles by component name, part number (both service and engineering/production), model and model year of the vehicle in which it is used and month/year of sale (including the cut-off date for sales, if applicable):

- a. Subject component;
- b. Any kits that have been released, or developed, by VW for use in service repairs to the subject component/assembly.

For each component part number, provide the supplier's name, address, and appropriate point of contact (name, title, and telephone number). Also identify by make, model and model year, any other vehicles of which VW is aware that contain the identical component, whether installed in production or in service, and state the applicable dates of production or service usage.

Response 11

In response to this inquiry, Volkswagen is providing a table outlining each item in subparagraph a) in an Adobe Acrobat file, entitled "REQUEST NUMBER ELEVEN DATA_PART SALES.pdf" in the folder attached hereto as Exhibit to Request 11.

Volkswagen notes the part sales information is inclusive of service part components utilized during repair of vehicles subject to recall 15V-483.

Volkswagen further notes that no kits have been developed or released for use in service repairs to the clock spring/SCCM, per subparagraph b).

Additionally, in response to this inquiry, Volkswagen is providing supplier identification and point of contact information in an Adobe Acrobat file format, "REQUEST NUMBER ELEVEN DATA_SUPPLIER-CONTACT.pdf", in the folder attached hereto as Exhibit to Request 11.

Source: Volkswagen

Date Gathered: Through the date of the inquiry

Exhibit to Request 11

REQUEST NUMBER ELEVEN DATA_PART SALES

&

REQUEST NUMBER ELEVEN DATA_SUPPLIER-CONTACT

Data is provided in Adobe Acrobat format in the Exhibit to Request 11 folder on the RQ17-009 Data Collection Disc

12. Furnish VW's assessment of the alleged defect in the subject vehicle, including:

- a. The causal or contributory factor(s);
- b. The failure mechanism(s);
- c. The failure mode(s);
- d. The risk to motor vehicle safety that it poses;
- e. What warnings, if any, the operator and the other persons both inside and outside the vehicle would have that the alleged defect was occurring or subject component was malfunctioning;
- f. The reports included with this inquiry.

Response 12

Volkswagen will provided its full response to Request 12 subparagraphs "a" thru "e" on or before February 09, 2018.

Response 12 f.

The clock spring supplier Valeo introduced a part modification (robust design) that was fully implemented in all plants by January 15, 2013. The improvements provided additional robustness against intrusion of outside contamination by reducing existing gaps in the clock spring assembly. There was no change to the clock spring part number at this time.

If a vehicles original clock spring had been replaced with the robust design version of the clock spring (produced after January 15, 2013), the replacement was documented in CARPORT and the production date of the replacement clock spring was recorded.

The identification of the subject vehicles for recall 15V-483 was based on the build date of the clock spring. The production date of the clock spring documented in Volkswagens CARPORT system was used to define the subject vehicles at the time of recall determination.

All vehicles with clock springs built before January 15, 2013 (subject component) were included in the recall (subject vehicles).

An evaluation of the 90 Vehicle Owner Questionnaires ("VOQ's") provided in RQ17-009 determined that the majority of the complaints were related to vehicles not included in the recall or alleged clock spring failures after the announcement of recall 15V-483.

Complaints have been categorized as shown in the table below:

Complaint	Count	Comment
Not in recall	50	37 with robust design; 13 with clock spring from different supplier
Failure after recall	21	
Clock spring failed	12	
General complaint	7	Not specific to clock spring failure, i.e. Takata concern, other parts, loss of value
Total	90	

All VOQ's where a VIN was provided were analyzed and the built date of the clock spring was checked in Volkswagens CARPORT system. It is noted that 8 VOQ's did not contain a VIN.

An evaluation of the 50 VOQ vehicles with the complaint "Not in recall" indicate 37 vehicles were equipped with clock springs that were produced after January 15, 2013. The vehicles either had the robust design clock spring installed in production or installed as a service replacement part. Additionally, 13 vehicles were equipped with a different clock spring design from a different supplier. These parts were outside the scope of recall 15V-483.

An evaluation of 21 VOQ vehicles with the complaint "Failure after recall" relate to allegations of failure of the clock spring after the recall measure of installing the cover was performed. The subject clock springs were likely to have been contaminated with hair or fabric strands/filaments prior to the recall repair and over time may have led to the failure of these clock springs.

An evaluation of 12 VOQ vehicles with the complaint "Clock spring failure" relate to allegations of failure of the original clock spring, resulting in potential loss of steering wheel functions, horn function and illumination of air bag light.

An evaluation of 7 VOQ vehicles determined customers conveyed general complaints, not specific to clock spring.

Volkswagen provides vehicle history records for each of the VOQ VINs provided, for the agency's review, in an Adobe Acrobat file, entitled "REQUEST NUMBER TWELVE (f) DOCUMENTS.pdf" in the folder attached hereto as Exhibit to Request 12.

An evaluation of vehicles that had recall 15V-483 completed, determined only 0.16% of repaired vehicles alleged a failure after recall completion, indicating a 99.8% effectiveness of the recall measure.

Exhibit to Request 12

REQUEST NUMBER TWELVE (f) DOCUMENTS

Data is provided in Adobe Acrobat format in the Exhibit to Request 12 folder on the RQ17-009 Data Collection Disc