



U.S. Department of Transportation
**National Highway Traffic Safety
Administration**



July 25, 2025

Mr. Chris Sandvig
Director, Group Customer Protection
Volkswagen Group of America, Inc.
3800 Hamlin Road
Auburn Hills, Michigan 48326

Subject: Information Request ID EA18003-03

Dear Mr. Sandvig:

As you are aware, the Office of Defects Investigation (ODI) of the National Highway Traffic Safety Administration (NHTSA) has opened Engineering Analysis EA18-003 to investigate allegations of steering wheel clock spring/steering column control module (SCCM) failures in certain vehicles manufactured by Volkswagen Group (VW). ODI is requesting additional information from VW to facilitate its investigation of the potential risk of improper deployment or failure to deploy of the driver air bag as well as failure of steering wheel controls (horn, cruise control, etc.) caused by failure of the SCCM.

The scope of this Information Request is defined as all SCCMs, original equipment or repair components, installed in the Subject and Peer Vehicles, as defined below. This Information Request seeks additional information to include data from repairs performed under VW's extended warranty program, covering the Subject and Peer Vehicles defined below, in ODI's analysis of the SCCM performance.

Unless otherwise stated in the text, the following definitions apply to these information requests:

- **Subject Vehicles:** All 2010-2014 Model Year (MY) CC, Passat, Eos, Golf, GTI, Jetta, Tiguan and 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.
- **Peer Vehicles:** All vehicles not subject to recall 15V-483 equipped with the Subject Component manufactured by VW for sale or lease in the United States, including but not limited to the District of Columbia and current United States territories and possessions.
- **Subject Component:** The steering wheel clock spring/steering column control module(s) (SCCM) designed to maintain the electrical connection of the air bag to the air bag control module, as well as other steering wheel mounted functions, as the steering wheel is rotated.

- **Alleged Defect:** Failure of the steering wheel clock spring/steering column control module (SCCM).
- **Subject Recall:** 15V-483
- **Time Frame of Interest:** August 5, 2015, to date of this request.
- **VW:** Volkswagen Group, all of its past and present officers and employees, whether assigned to its principal offices or any of its field or other locations, including all of its divisions, subsidiaries (whether or not incorporated) and affiliated enterprises and all of their headquarters, regional, zone and other offices and their employees, and all agents, contractors, consultants, attorneys and law firms and other persons engaged directly or indirectly (e.g., employee of a consultant) by or under the control of VW (including all business units and persons previously referred to), who are or were involved in any way as of 2010, with any of the following related to the alleged defect in the subject vehicles:
 - a. Design, engineering, analysis, modification or production (e.g., quality control);
 - b. Testing, assessment or evaluation;
 - c. Consideration, or recognition of potential or actual defects, reporting, record-keeping and information management, (e.g., complaints, field reports, warranty information, part sales), analysis, claims, lawsuits or arbitrations; or
 - d. Communication to, from or intended for zone representatives, fleets, dealers, or other field locations, including but not limited to people who have the capacity to obtain information from dealers.
- **Document:** “Document(s)” is used in the broadest sense of the word and shall mean all original written, printed, typed, recorded, or graphic matter whatsoever, however produced or reproduced, of every kind, nature, and description, and all non-identical copies of both sides thereof, including, but not limited to, papers, letters, memoranda, correspondence, communications, electronic mail (e-mail) messages (existing in hard copy and/or in electronic storage), faxes, mailgrams, telegrams, cables, telex messages, notes, annotations, working papers, drafts, minutes, records, audio and video recordings, data, databases, other information bases, summaries, charts, tables, graphics, other visual displays, photographs, statements, interviews, opinions, reports, newspaper articles, studies, analyses, evaluations, interpretations, contracts, agreements, jottings, agendas, bulletins, notices, announcements, instructions, blueprints, drawings, as-builts, changes, manuals, publications, work schedules, journals, statistical data, desk, portable and computer calendars, appointment books, diaries, travel reports, lists, tabulations, computer printouts, data processing program libraries, data processing inputs and outputs, microfilms, microfiches, statements for services, resolutions, financial statements, governmental records, business records, personnel records, work orders, pleadings, discovery in any form, affidavits, motions, responses to discovery, all transcripts, administrative filings and all mechanical, magnetic, photographic and electronic records or recordings of any kind, including any storage media associated with computers, including, but not limited to, information on hard drives, floppy disks, backup tapes, and

zip drives, electronic communications, including but not limited to, the Internet and shall include any drafts or revisions pertaining to any of the foregoing, all other things similar to any of the foregoing, however denominated by VW, any other data compilations from which information can be obtained, translated if necessary, into a usable form and any other documents. For purposes of this request, any document which contains any note, comment, addition, deletion, insertion, annotation, or otherwise comprises a non-identical copy of another document shall be treated as a separate document subject to production. In all cases where original and any non-identical copies are not available, “document(s)” also means any identical copies of the original and all non-identical copies thereof. Any document, record, graph, chart, film or photograph originally produced in color must be provided in color. Furnish all documents whether verified by VW or not. If a document is not in the English language, provide both the original document and an English translation of the document.

- **Other Terms:** To the extent that they are used in these information requests, the terms “claim,” “consumer complaint,” “dealer field report,” “field report,” “fire,” “fleet,” “good will,” “make,” “model,” “model year,” “notice,” “property damage,” “property damage claim,” “rollover,” “type,” “warranty,” “warranty adjustment,” and “warranty claim,” whether used in singular or in plural form, have the same meaning as found in 49 C.F.R. § 579.4.

In order for my staff to evaluate the alleged defect, certain information is required. Pursuant to 49 U.S.C. § 30166, please provide numbered responses to the following information requests. Insofar as VW has previously provided a document to ODI, VW may produce it again or identify the document, the document submission to ODI in which it was included and the precise location in that submission where the document is located. When documents are produced, the documents shall be produced in an identified, organized manner that corresponds with the organization of this information request letter (including all individual requests and subparts). When documents are produced and the documents would not, standing alone, be self-explanatory, the production of documents shall be supplemented and accompanied by explanation.

Please repeat the applicable request verbatim above each response. After VW’s response to each request, identify the source of the information and indicate the last date the information was gathered.

1. State the number of each of the following, received by VW during the Time Frame of Interest, 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;
 - d. Property damage claims;
 - e. Third-party arbitration proceedings, both pending and closed, 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 “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.

2. Separately, for each item (complaint, report, claim, notice, or matter) within the scope of your response to Request No. 1, state the following information in tabular form in an Excel spreadsheet titled “COMPLAINT DATA”:
 - a. VW’s file number or other identifier used;
 - b. The category of the item, as identified in Request No. 1 (i.e., consumer complaint, field report, etc.);
 - c. Vehicle owner or fleet name (and fleet contact person), email address and telephone number (please use distinct fields for each data type);
 - d. Vehicle identification number (17-character VIN);
 - e. Vehicle’s make, model and model year (please use distinct fields for each data type);
 - f. Vehicle’s mileage at time of incident (numeric data type);
 - g. Clock spring manufacturer;
 - h. Clock spring part number;
 - i. Incident date (MM/DD/YYYY);
 - j. Report or claim date (MM/DD/YYYY);
 - k. Whether a crash is alleged;
 - l. Whether property damage is alleged;
 - m. Number of alleged injuries, if any; and
 - n. Number of alleged fatalities, if any.
3. 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.
4. 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 during the Time Frame of Interest 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 in tabular form using the provided Excel spreadsheet titled “WARRANTY DATA”:

- a. VW’s claim number;
 - b. Claim Type (Recall 15V-483, Warranty, Goodwill, Warranty Extension, or Other).
 - c. Vehicle identification number (17-character VIN);
 - d. Make;
 - e. Model;
 - f. Model Year;
 - g. Repair date (MM/DD/YYYY);
 - h. Replaced clockspring manufacturer;
 - i. Replaced clockspring part number;
 - j. Replacement clockspring manufacturer;
 - k. Replacement clockspring part number;
 - l. Recall 15V-483 Remedy Performed (Shield, Clockspring, No Repair);
 - m. Warranty Extension Number;
 - n. Technical Service Bulletin Number;
 - o. Vehicle mileage at time of repair (numeric data type);
5. Describe in detail the search methods and 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.
 6. Provide additional information regarding Warranty Extension VWP-18-11 as well as its current status and any future plans for any updates or expansions, including, but not limited to:
 - a. The current scope of vehicles included in VWP-18-11;
 - b. How the scope of VWP-18-11 has changed between different version updates;
 - c. Why the scope of VWP-18-11 has changed between different version updates;
 - d. Provide the definitions for and differences between Warranty Keys U36 and U37; and
 - e. Provide all reasons for ineligibility of coverage under VWP-18-11.
 7. Provide VW’s assessment of the effectiveness of Warranty Extension VWP-18-11, including, but not limited to:
 - a. Number of claims paid under the warranty extension for Subject and Peer Vehicles. Separate these counts by model, model year, Subject Component part number, and Subject Component supplier;
 - b. Number of claims paid under the warranty extension for Subject Vehicles previously repaired under the Subject Recall. Separate these counts by model, model year, subject component part number, and Subject Component supplier; and

- c. Number of repeat failures in Subject and Peer Vehicles after a repair under the warranty extension was performed. Separate these counts by model, model year, Subject Component part number, and Subject Component supplier.
8. Provide copies of all service, warranty, and other documents that relate to or may relate to the Alleged Defect or Subject Component in the Subject and Peer Vehicles that VW has issued to any dealers, regional or zone offices, field offices, fleet purchasers, vehicle owners, or other entities. This includes, but is not limited to, technical service bulletins, warranty extensions, customer satisfaction campaigns, advisories, informational documents, training documents or other documents or communications except for standard shop manuals.

Legal Authority for This Request

This letter is being sent to VW pursuant to 49 U.S.C. § 30166, which authorizes NHTSA to conduct any investigation that may be necessary to enforce Chapter 301 of Title 49 and to request reports. It constitutes a new request for information.

Civil Penalties

VW's failure to respond promptly and fully to this letter could subject VW to civil penalties pursuant to 49 U.S.C. § 30165 or lead to an action for injunctive relief pursuant to 49 U.S.C. § 30163. (Other remedies and sanctions are available as well.) The Vehicle Safety Act, 49 U.S.C. § 30165(a)(3), provides for civil penalties of up to \$27,874 per violation per day, with a maximum of \$139,356,994 for a related series of daily violations, for failing or refusing to perform an act required under 49 U.S.C. § 30166. See 49 C.F.R. § 578.6(a)(3). This includes failing to respond completely, accurately, or in a timely manner to ODI information requests.

If VW cannot respond to any specific request or subpart(s) thereof, please state the reason why it is unable to do so. If on the basis of attorney-client, attorney work product, or other privilege, VW does not submit one or more requested documents or items of information in response to this information request, VW must provide a privilege log identifying each document or item withheld, and stating the date, subject or title, the name and position of the person(s) from, and the person(s) to whom it was sent, and the name and position of any other recipient (to include all carbon copies or blind carbon copies), the nature of that information or material, and the basis for the claim of privilege and why that privilege applies.

Confidential Business Information (CBI)

If VW's response contains any information that you claim is confidential business information, VW must submit its request for confidential treatment and any files containing CBI to NHTSA's Office of the Chief Counsel via the CBI Portal of a secure electronic file transfer link. Please see enclosure 1 for additional instructions on submitting a request for confidential treatment that is compliant with 49 C.F.R. Part 512 (specifically, a request for confidential treatment must include the four required parts that are discussed in enclosure 1).

If you choose not to submit your request and files containing CBI to NHTSA's Office of the Chief Counsel via the CBI Portal, please notify the investigator referenced in this IR to ensure

that the secure file transfer link for your request for confidential treatment and any files containing CBI are directed to the Office of the Chief Counsel accordingly.

In addition to submitting a request for confidential treatment and files containing CBI directly to NHTSA's Office of the Chief Counsel via the CBI Portal, **VW must also submit its request for confidential treatment, the files containing CBI, and their corresponding redacted versions directly to ODI via the Safety Defect Investigations (SDI) Portal.** The requests for confidential treatment and certification documents are not confidential so these documents should be uploaded as non-confidential files.

Please refer to EA18003-03 in VW's response to this letter and in the request for confidential treatment that VW may submit.

Due Date

VW's response to this letter must be submitted to this office by **AUGUST 22, 2025**. If VW finds that it is unable to provide all of the information requested within the time allotted, VW must request an extension from Sharon Yukevich at 202-366-4925, 202-836-3605 or sharon.yukevich@dot.gov no later than five business days before the response due date. If VW is unable to provide all of the information requested by the original deadline, it must submit a partial response by the original due date with whatever information VW then has available, even if an extension has been granted.

If you have any technical questions concerning this matter, please call Kevin McGough of my staff at (202) 366-3319.

Sincerely,

Tanya Topka

Tanya Topka, Director
Office of Defects Investigation

Enclosure 1, Information for Requests for Confidential Treatment.

ENCLOSURE 1 – INFORMATION FOR REQUESTS FOR CONFIDENTIAL TREATMENT

If you believe that your response contains any material that you claim is confidential business information, submit these materials to NHTSA's Office of the Chief Counsel in accordance with 49 C.F.R. Part 512. **All requests for confidential treatment must be submitted directly to the Office of the Chief Counsel via the Confidential Business Information (CBI) Portal or a secure file transfer link for your submission addressed to the Office of the Chief Counsel. If you are not currently registered for the CBI Portal, you may send a registration request to cbi-helpdesk@dot.gov. In addition to directly submitting the files to the Office of the Chief Counsel, you will also need to submit your request, the files containing CBI, and their corresponding redacted versions directly to ODI through the Safety Defect Investigations (SDI) Portal.**

Requests for confidential treatment are governed by Part 512. A current version of this regulation is available on the internet at <http://www.ecfr.gov> by selecting Title 49 "Transportation," selecting "Parts 500 – 599" and then selecting Part 512 "Confidential Business Information."

How to request confidential treatment:

NHTSA is currently treating electronic submission as an acceptable method for submitting confidential business information to the agency under Part 512. If you claim that any of the information or documents provided in your response constitutes confidential business information within the meaning of 5 U.S.C. § 552(b)(4), or are protected from disclosure pursuant to 18 U.S.C. § 1905, you must submit the information or documents directly to the Office of Chief Counsel via the CBI Portal or request a secure file transfer link from the ODI contact listed in your Information Request. You must submit supporting information together with the materials that are the subject of the confidentiality request, in accordance with Part 512, to the Office of the Chief Counsel. Do not send a hardcopy of a request for confidential treatment to NHTSA's headquarters.

Your request must include a request letter that contains supporting information, pursuant to Part 512.8. Your request must also include a certificate, pursuant to Part 512.4(b) and Part 512, Appendix A.

You are required to submit one unredacted "confidential version" of the information for which you are seeking confidential treatment. Pursuant to Part 512.6, the words "ENTIRE PAGE CONFIDENTIAL BUSINESS INFORMATION" or "CONFIDENTIAL BUSINESS INFORMATION CONTAINED WITHIN BRACKETS" (as applicable) must appear at the top of each page containing information claimed to be confidential. In the latter situation, where not all information on the page is claimed to be confidential, identify each item of information for which confidentiality is requested within brackets: "[]."

You are also required to submit one redacted "public version" of the information for which you are seeking confidential treatment. Pursuant to Part 512.5(a)(2), the redacted "public version" should include redactions of any information for which you are seeking confidential treatment (i.e., the only information that should be unredacted is information for which you are **not** seeking confidential treatment).

For questions about a request for confidential treatment, please contact Dan Rabinovitz in the Office of the Chief Counsel at Daniel.Rabinovitz@dot.gov or (202)366-8534.