

Requests and Responses

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.

Request 1

State the number of subject and peer vehicles VW has manufactured for sale or lease in the United States. Separately, for the subject and peer vehicles manufactured to date by VW, state the following:

- a. Make;
- b. Model;
- c. Model Year;
- d. CLT part number;
- e. CLT supplier;
- f. Buckle stalk part number;
- g. Buckle stalk flexible or solid;
- h. Buckle stalk supplier;
- i. Seat belt assembly part number;
- j. Seat belt assembly supplier;
- k. Driver or passenger side;
- l. Production volume.

Response 1

In response to this inquiry, Volkswagen provides the population of both the subject and peer vehicles identified in EA18-005.

Population data is provided for 2018-2020 Model Year (MY) Volkswagen Tiguan and 2015-2021 Model Year Volkswagen and Audi models equipped with a CLT or flexible seat belt buckle stalk (a stalk comprised of 2 twisted metal cables covered by a plastic sheath) or both, 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.

Make	Carline	2015	2016	2017	2018	2019	2020	2021	Total Of VIN
Volkswagen	Tiguan LWB				105,170	110,213	72,277		287,660
	Total				105,170	110,213	72,277		287,660

Make	Carline	2015	2016	2017	2018	2019	2020	2021	Total Of VIN
Audi	Peer	207,907	194,557	212,266	333,483	239,813	105,009		1,293,035
Volkswagen	Peer	347,060	331,993	384,516	213,571	366,269	84,462	4,563	1,732,434
	Total	554,967	526,550	596,782	547,054	606,082	189,471	4,563	3,025,469

Separately, for responses to subparagraphs “a” through “l”, please reference the updated table “CLT_non_CLT and Population_CONFID_20200717” enclosed with this response.

Additionally, please reference Attachment A for the production information related to the subject 2018-2020 MY Tiguan vehicles and 2015-2021 MY Volkswagen and Audi peer vehicles.

Source: Business Objects Vehicles Universe

Date Gathered: Through the date of the inquiry

Request 2

Identify the party who is responsible for the definition of the performance standards (e.g. configuration, component movement during crash sequence, durability, expected and maximum stresses applied to vehicle occupants, system tolerance of external loading) for seat belt assemblies and the components comprising said assemblies for the purpose of use in vehicles manufactured by VW for sale or lease in the United States in both subject and peer vehicles?

Response 2

Volkswagen AG and Audi AG technical development organizations are responsible for the definition of performance standards for seat belt assemblies and components comprising said assemblies for the purpose of use in both subject and peer vehicles manufactured for sale or lease in the United States.

Request 3

Describe in detail and supply documentation of the performance standards referenced in Request 2 for the seat belt assemblies and the individual components comprising the assemblies manufactured for use in vehicles manufactured by VW for sale or lease in the United States for both subject and peer vehicles.

Response 3

In response to this inquiry, Volkswagen provides a list of relevant requirement documents and performance standards referenced in Request 2 for the seat belt assemblies and the individual components comprising the assemblies manufactured for use in vehicles manufactured by VW for sale or lease in the United States for both subject and peer vehicles.

Some documents are the same as Volkswagen provided in response to PE18-001. These documents describe the general component specifications and requirements due to the different seat belt components in the car.

Response 3 cont'd.

The following table lists the specifications and their correlation between an individual vehicle and the document version applicable to that vehicle, described below. In order to be able to make an assignment, the individual assignment to the documents is made for each vehicle.

Model	Document (Index) Number	Seat Belt Performance Specification - Vehicle Specific	Document (Index) Number	LAH.DUM.857.D	TL 471	TL 52454	TL 82500	TL 82501	TL 82503
Atlas Cross Sport	0008	LAH.DUM.857.CS_04-2017	0036	LAH.DUM.857.D V4.1_08-2016	Issue 10-2011	Issue 04-2010	Issue 02-2011	Issue 05-2009	Issue 06-1998
Atlas	0007	LAH.DUM.857.BT_07-2014	0011	LAH.DUM.857.D V3.0.1_05-2014	Issue 10-2011	Issue 04-2010	Issue 02-2011	Issue 05-2009	Issue 06-1998
Atlas Facelift	0008	LAH.DUM.857.CS_04-2017	0036	LAH.DUM.857.D V4.1_08-2016	Issue 10-2011	Issue 04-2010	Issue 02-2011	Issue 05-2009	Issue 06-1998
Arteon	0002	LAH.3G8.857_09-2011	0034	LAH.DUM.857.D V2.5_05-2011	Issue 11-2006	Issue 04-2010	Issue 02-2011	Issue 05-2009	Issue 06-1998
Tiguan LWB	0006	LAH.5N1.857_02-2015	0011	LAH.DUM.857.D V3.0.1_05-2014	Issue 10-2011	Issue 04-2010	Issue 02-2011	Issue 05-2009	Issue 06-1998
Jetta A7	0007	LAH.DUM.857.BT_07-2014	0011	LAH.DUM.857.D V3.0.1_05-2014	Issue 10-2011	Issue 04-2010	Issue 02-2011	Issue 05-2009	Issue 06-1998
Golf R	0004	LAH.5G0.857.J_02-2012	0034	LAH.DUM.857.D V2.5_05-2011	Issue 10-2011	Issue 04-2010	Issue 02-2011	Issue 05-2009	Issue 06-1998
e-Golf	0005	LAH.5G0.857.J_02-2012	0034	LAH.DUM.857.D V2.5_05-2011	Issue 10-2011	Issue 04-2010	Issue 02-2011	Issue 05-2009	Issue 06-1998
Golf, GTI, Sportwagen, Alltrack	0004	LAH.5G0.857.J_02-2012	0034	LAH.DUM.857.D V2.5_05-2011	Issue 10-2011	Issue 04-2010	Issue 02-2011	Issue 05-2009	Issue 06-1998
	0005	LAH.5G0.857.J_02-2012	0034	LAH.DUM.857.D V2.5_05-2011	Issue 10-2011	Issue 04-2010	Issue 02-2011	Issue 05-2009	Issue 06-1998
Passat	0001	LAH.561.857.A_09-2008		-	Issue 11-2006	Issue 06-2008	Issue 03-1996	Issue 05-2007	Issue 06-1998
Jetta A6	0003	LAH.5C6.857.R_07-2012	0035	LAH.DUM.857.D V2.6_07-2012	Issue 10-2011	Issue 04-2010	Issue 02-2011	Issue 05-2009	Issue 06-1998
Touareg 2	0010	LAH.7P0.880_01-2007		-	Issue 11-2006	Issue 04-2000	Issue 03-1996	Issue 10-2006	Issue 06-1998
Tiguan I / Limited	0013	LAH.5N0.857_07-2005		-	Issue 12-1990	Issue 04-2000	Issue 03-1996	Issue 01-2005	Issue 06-1998
CC	0012	LAH.3C8.857_03-2006		-	Issue 12-1990	Issue 04-2000	Issue 03-1996	Issue 01-2005	Issue 06-1998
EOS	0009	LAH.1Q0.857_08-2003		-	Issue 12-1990	Issue 04-2000	Issue 03-1996	Issue 12-1995	Issue 06-1998
Beetle / Convertible	0030	LAH.5C5.857.A_02-2009	0033	LAH.DUM.857.D V2.0_02-2009	Issue 11-2006	Issue 06-2008	Issue 03-1996	Issue 05-2007	Issue 06-1998
Q7	07/21/2020	LAH_4L0_857_16.05.2003		-	Issue 12-1990	Issue 04-2000	Issue 03-1996	Issue 12 1995	Issue 06-1998
TT		-		-	Issue 12-1990	Issue 04-2000	Issue 03-1996	Issue 12 1995	Issue 06-1998
A4 Limousine									
A4 Allroad	07/21/2020	LAH.8K0.857.R_17.03.2005		-	Issue 12-1990	Issue 04-2000	Issue 03-1996	Issue 01-2005	Issue 06-1998
A5 Coupe									
A5 Cabrio									
Q5	07/21/2020	LAH.8R0.857.AA_21.02.2006		-	Issue 12-1990	Issue 04-2000	Issue 03-1996	Issue 01-2005	Issue 06-1998
R8 Coupe / Spyder	07/21/2020	LAH.420.857.D_30.06.2006		-	Issue 12-1990	Issue 04-2000	Issue 03-1996	Issue 01-2005	Issue 06-1998
A6 Limousine	07/21/2020	LAH.4G0.857.F_19.01.2007		-	Issue 12-1990	Issue 04-2000	Issue 03-1996	Issue 01-2005	Issue 06-1998
A7 Sportback				-					
A8	07/21/2020	LAH.4H0.857.C_23.05.2007		-	Issue 12-1990	Issue 04-2000	Issue 03-1996	Issue 01-2005	Issue 06-1998
Q3	0018	LAH.8U0.857.A_05.06.2008	0047	general book of requirements for seat belt pretensioners and seat belt	Issue 12-1990	Issue 04-2000	Issue 03-1996	Issue 01-2005	Issue 06-1998
A3 Sedan									
A3 Sportback	0020	LAH.8V0.85.7 F_31.07.2009	0034	LAH.DUM.857.D V2.5_05-2011	Issue 10-2011	Issue 04-2010	Issue 02-2011	Issue 05-2009	Issue 06-1998
A3 Cabrio									
TT Coupe	07/21/2020	LAH.8S0.857.A_31.03.2011	0034	LAH.DUM.857.D V2.5_05-2011	Issue 10-2011	Issue 04-2010	Issue 02-2011	Issue 05-2009	Issue 06-1998
TT Roadster									
A4 Sedan									
A4 Avant Allroad	0022	LAH.8W0.857.D_11.07.2011	0034	LAH.DUM.857.D V2.5_05-2011	Issue 10-2011	Issue 04-2010	Issue 02-2011	Issue 05-2009	Issue 06-1998
A5 Sportback									
A5 Coupe									
A5 Cabrio									
Q7	0025	LAH.4M0.857.C_27.10.2011	0034	LAH.DUM.857.D V2.5_05-2011	Issue 10-2011	Issue 04-2010	Issue 02-2011	Issue 05-2009	Issue 06-1998
R8 Coupe	07/21/2020	LAH.4S0.857.R_02.05.2013	0034	LAH.DUM.857.D V2.5_05-2011	Issue 10-2011	Issue 04-2010	Issue 02-2011	Issue 05-2009	Issue 06-1998
R8 GT									
R8 Spyder									
Q8	0024	LAH.4M0.857.BC_13.05.2014	0011	LAH.DUM.857.D_v3.0.1_05-2014	Issue 10-2011	Issue 04-2010	Issue 02-2011	Issue 05-2009	Issue 06-1998
A8	07/21/2020	LAH.4N0.857.D_19.05.2014	0011	LAH.DUM.857.D_v3.0.1_05-2014	Issue 10-2011	Issue 04-2010	Issue 02-2011	Issue 05-2009	Issue 06-1998
Q5	0021	LAH.80A.857.AA_31.05.2016	0011	LAH.DUM.857.D_v3.0.1_05-2014	Issue 10-2011	Issue 04-2010	Issue 02-2011	Issue 05-2009	Issue 06-1998
Q3	0019	LAH.83A.857.R_09.2016	0011	LAH.DUM.857.D_v3.0.1_05-2014	Issue 10-2011	Issue 04-2010	Issue 02-2011	Issue 05-2009	Issue 06-1998
A6 Sedan									
A6 Avant Allroad	0026	LAH.4G0.857.BK_07.2017	0011	LAH.DUM.857.D_v3.0.1_05-2014	Issue 10-2011	Issue 04-2010	Issue 02-2011	Issue 05-2009	Issue 06-1998
A7; RS7									
etron	0023	LAH.4KE.857.Q_18.02.2018	0011	LAH.DUM.857.D_v3.0.1_05-2014	Issue 10-2011	Issue 04-2010	Issue 02-2011	Issue 05-2009	Issue 06-1998
etron Sportback									

Volkswagen provides the documents in electronic format, including an index for convenience, aligned with the specifications listed in the table above.

Response 3 cont'd.

The relevant performance and supply specifications are provided in electronic format, including an index for convenience, aligned with the specifications listed the following image. Documents related to Seat Belt Performance Specification and ZF-TRW are to be available with the final response submission July 21, 2020.

VW TL471: Seat Belt Systems and Height Adjustment ASSY • Fastening parts and plastic parts • Locking parts • Retractors and belt tensioners • Height adjustment • Dynamic testing	VW TL82500: Seat Belt Retractor • Requirements and Tests	VW TL82501: Seat Belt Tensioner • Requirements and Tests • Performance data/properties	VW TL82503: Seat Belt Buckle and Latch Plate • Requirements and Tests • Geometry Functional requirements • Enviromental requirements
VW TL52454: Belt Webbing for Seat Belts • Material Requirements	LAH.DUM.857.D General Performance Specification seat belt components • General Requirements • Techn. Requirements • Tests and Verification	Seat Belt Performance Specification – Vehicle Specific • Vehicle specific requirements	ZF-TRW: Verification Plan and Report: Crash Locking Tongue • Requirements and Tests

Overview of Requirements and performance standards.

- **VW TL471 - Seat Belt Systems and Height Adjustment ASSY**
This technical supply specification describes in detail material and functional requirements for seat belt – and their height adjustment systems.
There are general requirements and definitions for seat belt components, different testing setups like aging and dynamic sled tests. Details are also specified in the other requirement documents like TL82500, TL82501 and TL82503.
The change log for this specification document will be provided at a later date.
- **VW TL82500 – Seat Belt Retractor, Requirements and Test**
This technical supply specification deals with detailed requirements of retractors. This is the main requirement document for all retractors used in the entire Volkswagen group. All required test to fulfill all Volkswagen requirements are described.
- **VW TL82501 - Seat-Belt Tensioner Restraint System, Requirements and test.**
This technical supply specification deals with detailed requirements and test specifications for Seat-Belt Tensioner Restraint System.
- **VW TL82503 - Seat Belt Buckle and Latch Plate, Requirements and test.**
This technical supply specification deals with detailed functional requirements, geometries, and test specifications to seat belt buckles and latch plates.
- **VW TL52454 – Belt Webbing for Seat Belts**
This technical supply specification defines the requirements for belt webbings used for seat belts.

Response 3 cont'd.

- ZF-TRW: Verification Plan and Report: Crash Locking Tongue
The CLT in all vehicles responsive to request 1 utilize the design from ZF-TRW. There is no technical supply specification for the CLT at this time. Therefore, Volkswagen provides the “ZF-TRW Verification Plan and Report” for the initial release of the CLT, first equipped in the 2015 MY Volkswagen Golf.
The “ZF-TRW Verification Plan and Report” represents the requirements and documentation of the tests that were conducted for the release of the CLT.
- LAH.DUM.857.D – Group Module Performance Specifications for Seat Belts and Seat Belt Buckles This specification describes the performance, requirements and testing conditions that must be fulfilled by the seat belt products to be developed by the supplier.
The change log for this specification document will be provided at a later date.
- Seat Belt Performance Specification – Vehicle Specific:
These specifications describe vehicle specific requirements.