

# VOLKSWAGEN

GROUP OF AMERICA

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7/19/18

Stephen Ridella, Director  
Office of Defects Investigation  
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  
July 02, 2018 Date

**Re: Request for Extension - NHTSA Inquiry EA18-003: Clock Spring  
Certain 2010 - 2014 MY Volkswagen Vehicles  
All 2010 to Present MY Volkswagen and Audi Vehicles (Peer)**

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

Dear Mr. Ridella:

As a follow up to our phone conversation this afternoon, Volkswagen is requesting an extension to the NHTSA investigation EA18-003: Steering Wheel Clock Spring / Steering Column Control Module (SCCM), until August 17, 2018.

Volkswagen proposes the following schedule, following a substantial partial response submitted by the original due date, July 09, 2018:

- July 09, 2018 - Responses to Requests 1-6, 11 and a partial response to Request 10
- July 20, 2018 - Responses to Request 9 and completion of Response 10
- August 03, 2018 - Partial response to Request 8
- August 17, 2018 - Response to Request 7 and completion of Response 8

Volkswagen requests the extension in light of the expanded scope of EA18-003, as it encompasses 10 full model years and includes each Volkswagen and Audi model, as peer vehicles, which were available throughout the 10 model years. Volkswagen also understands its obligation to ensure that native language documents are accompanied by a translated version in the English language.

Your consideration of Volkswagen's request to provide a comprehensive and factual response in the shortest possible timeframe is appreciated and I look forward to your decision within the next business day.

Sincerely,



Christopher T. Sandvig  
Director, Group Customer Protection  
Group Quality

# VOLKSWAGEN

GROUP OF AMERICA

rec'd  
7/23/18

Stephen Ridella  
Director, Office of Defects Investigation  
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  
July 19, 2018 Date

Subject: EA18-003 NEF101sly

Dear Mr. Ridella:

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

Please find enclosed Volkswagen's 2<sup>nd</sup> partial response to EA18-003, dated May 23, 2018, requesting information concerning allegations of steering wheel clock spring/steering column control module (SCCM) failures for the following subject vehicles: 2010-2014 Model Year (MY) CC, Passat, Eos, Golf, GTI, Jetta, Tiguan and Jetta Sportwagen models. Additionally, the inquiry expanded the scope to include the following peer vehicles: 2015 MY to present CC, Passat, Eos, Golf, GTI, Jetta, Tiguan and Jetta Sportwagen vehicles and all other 2010 MY to present Volkswagen and Audi vehicles.

Thank you for your approval of Volkswagen's request of July 02, 2018 for a partial extension of time to respond to the Office of Defects Investigation (ODI) Information Request letter for EA18-003 to August 17, 2018.

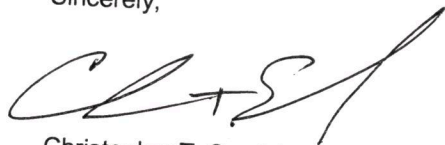
As was agreed, Volkswagen will provide to the agency submissions every 2 weeks, until completion, on or before August 17, 2018.

With regard to certain documents expected with the July 20, 2018 response, per Volkswagen's outreach to the agency on July 19, 2018, it is agreed that the information will be incorporated into Volkswagen's response on August 03, 2018. Thank you very much for your consideration and understanding.

For the enclosed response, each request is restated verbatim and then followed by our response.

Volkswagen also notes that the supplier Valeo, as part of this partial response, is providing documents in response to Request 8, under separate cover and under request for confidentiality, to NHTSA's Office of Chief Counsel. An email notification is also forwarded to Ms. Sharon Yukevich and includes the FedEx tracking number of Valeo's submission.

Sincerely,

A handwritten signature in black ink, appearing to read 'CT Sandvig', written in a cursive style.

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

Enclosures

Request 1

1. State, by model and model year, the number of subject vehicles and peer vehicles VW has manufactured for sale or lease in the United States. Separately, for each subject vehicle 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. Supplier of subject component installed as original equipment;
  - g. Date of manufacture;
  - h. Date warranty coverage commenced; and
  - i. 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 the following 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.

Additionally, Volkswagen provides the population of the following peer vehicles:

- All 2015 MY to present CC, Passat, Eos, Golf, GTI, Jetta, Tiguan and Jetta Sportwagen vehicles and all other 2010 MY to present Volkswagen and Audi vehicles.

Please reference the table in Attachment 1 for an overview of the population of subject and peer vehicles.

For responses to subparagraphs "a" through "i," please see Microsoft Access database entitled "PRODUCTION DATA.accdb" in the folder attached hereto as Exhibit to Request 1.

It is noted that in cases where the supplier and/or part number information is not present in a VIN record, it was determined that the information is not present / available in Volkswagen's production management system. Efforts are ongoing to investigate other avenues in which the information may be acquired.



Response 1 cont'd.

Volkswagen notes the following:

For the purpose of this inquiry, the subject vehicle population, 2010-2014 MY CC, Passat, Eos, Golf, GTI, Jetta, Tiguan and Jetta Sportwagen vehicles, are designated in the population file and enclosed responsive documents as "RQ17". These vehicles were subject to recall 15V-483

For the purpose of this inquiry, the peer vehicle population, is designated in the population file and enclosed responsive documents as:

- 2015 MY to present CC, Passat, Eos, Golf, GTI, Jetta, Tiguan and Jetta Sportwagen vehicles – "VW SUBJECT". These vehicle were NOT subject to recall 15V-483
- 2010 MY to present Volkswagen vehicles NOT included in above – "VW PEER"
- 2010 MY to present Audi – "AUDI PEER"

The vehicle populations and responsive materials are identified in the above manner to ensure the agency is able to evaluate responsive information that is aligned to the subject / peer vehicles requested.

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.accdb" in Microsoft Access format in the Exhibit to Request 1 folder on the enclosed EA18-003 electronic media

## Request 2

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 and/or 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 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.

## 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 1,451 consumer complaints related to the alleged defect in the subject and peer vehicles;
- b. In response to this inquiry, Volkswagen has identified 524 field reports related to the alleged defect in the subject and peer vehicles;
- c. In response to this inquiry, Volkswagen has not identified any reports involving a crash, injury or fatality related to the alleged defect in the subject and peer vehicles;
- d. In response to this inquiry, Volkswagen has not identified any property damage claims related to the alleged defect in the subject and peer vehicles;
- e. In response to this inquiry, Volkswagen has identified 4 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, MED/ARB, PL, FRED, FTIS, ATA/VTA

Date Gathered: Through the date of the inquiry

### Request 3

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 another 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. Clockspring manufacturer;
  - h. Clockspring part number;
  - i. Incident date;
  - j. Report or claim date;
  - k. Whether a crash is alleged;
  - l. Whether property damage is alleged; and
  - m. Number of alleged injuries, if any;
  - n. 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 "n" are provided in four separate files entitled,

- REQUEST NUMBER TWO DATA\_Audi Peer.xlsx;
- REQUEST NUMBER TWO DATA\_RQ17 Update.xlsx;
- REQUEST NUMBER TWO DATA\_VW Peer.xlsx;
- REQUEST NUMBER TWO DATA\_VW Subject.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 in Microsoft Excel format in the Exhibit to Request 3 folder on the enclosed EA18-003 electronic media. The files are labeled as listed:

REQUEST NUMBER TWO DATA\_Audi Peer.xlsx;  
REQUEST NUMBER TWO DATA\_RQ17 Update.xlsx;  
REQUEST NUMBER TWO DATA\_VW Peer.xlsx;  
REQUEST NUMBER TWO DATA\_VW Subject.xlsx



#### Request 4

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 inquiry (EA18-003): 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.
- Identify the population of peer vehicles covered by the subject inquiry (EA18-003): All 2015 MY to present CC, Passat, Eos, Golf, GTI, Jetta, Tiguan and Jetta Sportwagen vehicles and all other 2010 MY to present Volkswagen and Audi vehicles.
- Identify applicable part numbers of the subject component used to affect repairs in the subject and peer vehicles covered by the subject inquiry (EA18-003):

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", "b", and "e" are provided within the four separate files entitled:

- REQUEST NUMBER TWO DATA\_Audi Peer.pdf;
- REQUEST NUMBER TWO DATA\_RQ17 Update.pdf;
- REQUEST NUMBER TWO DATA\_VW Peer.pdf;
- REQUEST NUMBER TWO DATA\_VW Subject.pdf

in the folder attached hereto as Exhibit to Request 4. Records are organized by case number then by category.

Responsive documents to Request No. 2 subparagraphs "c" and "d" will be provided by July 20, 2018.

There are no responsive documents to Request No. 2 subparagraph "f".

Source, Date Gathered: See Response 2

Exhibit to Request 4

REQUEST NUMBER TWO DOCUMENTS

Data is provided in Adobe Acrobat format in the Exhibit to Request 4 folder on the enclosed EA18-003 electronic media. The files are listed as:

REQUEST NUMBER TWO DATA\_Audi Peer.pdf;  
REQUEST NUMBER TWO DATA\_RQ17 Update.pdf;  
REQUEST NUMBER TWO DATA\_VW Peer.pdf;  
REQUEST NUMBER TWO DATA\_VW Subject.pdf

#### Request 5

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 and/or 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:

- 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. Original clockspring manufacturer;
- f. Replacement clockspring manufacturer;
- g. Recall 15V-483 Remedy Repair (Yes or No);
- h. Recall 15V-483 Remedy Performed (Shield, Module Replacement or Not Applicable);
- i. Vehicle mileage at time of repair;
- j. Repairing dealer's or facility's name, telephone number, city and state or ZIP code;
- k. Labor operation number(s);
- l. Problem code(s);
- m. Diagnostic trouble code(s);
- n. Original part number(s) and description(s);
- o. Replacement part number(s) and description(s);
- p. Concern stated by customer;
- q. Cause as stated on the repair order;
- r. Correction as stated on the repair order; and
- s. 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 310,573 unique recall / warranty claims on 303,855 unique vehicles related to the alleged defect in the subject and peer vehicles. Volkswagen notes that 928 claims are duplicative of consumer complaints and 512 claims are duplicative of field reports.

Information for these claims is provided in Microsoft Excel format, in two files entitled "WARRANTY DATA.xlsx" and "69L2\_EFTs.xlsx", in the folder attached hereto as Exhibit to Request 5. The claims are organized by claim number.

Response 5 cont'd.

Volkswagen also provides a summary table of claim counts, separated by claim type, in response to the agency's request for the information. As requested, the information is listed by make, model and model year.

Information for these claims is provided in Microsoft Excel format, entitled "WARRANTY SUMMARY.xlsx", in the folder attached hereto as Exhibit to Request 5.

Source: Business Objects Warranty Universe

Date Gathered: Through the date of the inquiry

Exhibit to Request 5

WARRANTY DATA

Data is provided in the files labeled as "WARRANTY DATA.xlsx", "69L2\_EFTs.xlsx", and "WARRANTY SUMMARY.xlsx" in Microsoft Excel format in the Exhibit to Request 5 folder on the enclosed EA18-003 electronic media



#### Request 6

6. 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.

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 and peer vehicles. State whether the diagnostic trouble codes are automatically reported to the warranty database electronically or manually entered in 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 and peer 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 inquiry (EA18-003): 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 the population of peer vehicles covered by the subject inquiry (EA18-003): All 2015 MY to present CC, Passat, Eos, Golf, GTI, Jetta, Tiguan and Jetta Sportwagen vehicles and all other 2010 MY to present Volkswagen and Audi vehicles.
- Identify claims in which the Clock Spring Cover (5K0953259) service part was utilized to affect repairs in the subject vehicle (for subject vehicles affected by recall 15V-483)
- Identify claims in which the Steering Wheel Clock Spring service part was utilized to affect repairs in the subject and peer vehicles
- 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

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.

The individual items were 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 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. Failure of the system includes a split deployment (i.e. non-deployment of the driver front air bag and deployment of the passenger front air bag).

The following tables indicate, by make, model year, and model, the terms of the new vehicle warranty coverage offered by VW on the subject vehicles and peer vehicles.

Table 1 is representative of Volkswagen vehicles included in RQ17-009, and the subject vehicles identified for model years 2015 through present:

| Make       | Model Year | Model                | New Vehicle Limited Warranty | Extended Warranty | Classification |
|------------|------------|----------------------|------------------------------|-------------------|----------------|
| Volkswagen | 2010-2014  | CC                   | 3 Years / 36,000 Miles       | N/A               | RQ             |
| Volkswagen | 2010-2013  | Eos                  | 3 Years / 36,000 Miles       | N/A               | RQ             |
| Volkswagen | 2011-2014  | Golf/GTI/R           | 3 Years / 36,000 Miles       | N/A               | RQ             |
| Volkswagen | 2010-2013  | Jetta                | 3 Years / 36,000 Miles       | N/A               | RQ             |
| Volkswagen | 2012-2013  | Jetta Sportwagen     | 3 Years / 36,000 Miles       | N/A               | RQ             |
| Volkswagen | 2010-2014  | Passat (USA/Germany) | 3 Years / 36,000 Miles       | N/A               | RQ             |
| Volkswagen | 2011-2014  | Tiguan               | 3 Years / 36,000 Miles       | N/A               | RQ             |
| Volkswagen | 2015-2017  | CC                   | 3 Years / 36,000 Miles       | N/A               | VW Subject     |
| Volkswagen | 2014-2016  | Eos                  | 3 Years / 36,000 Miles       | N/A               | VW Subject     |
| Volkswagen | 2015-2017  | Golf/GTI/R           | 3 Years / 36,000 Miles       | N/A               | VW Subject     |
| Volkswagen | 2018       | Golf/GTI/R           | 6 Years / 72,000 Miles       | N/A               | VW Subject     |
| Volkswagen | 2014-2017  | Jetta                | 3 Years / 36,000 Miles       | N/A               | VW Subject     |
| Volkswagen | 2018-2019  | Jetta                | 6 Years / 72,000 Miles       | N/A               | VW Subject     |
| Volkswagen | 2014       | Jetta Sportwagen     | 3 Years / 36,000 Miles       | N/A               | VW Subject     |
| Volkswagen | 2015-2017  | Passat (USA/Germany) | 3 Years / 36,000 Miles       | N/A               | VW Subject     |
| Volkswagen | 2018       | Passat (USA/Germany) | 6 Years / 72,000 Miles       | N/A               | VW Subject     |
| Volkswagen | 2015-2017  | Tiguan               | 3 Years / 36,000 Miles       | N/A               | VW Subject     |

Source: VWGoA

Date Gathered: Through the date of the inquiry

Response 6 cont'd.

Table 2 is representative of Volkswagen and Audi peer vehicles, identified for model years 2010 through present:

| Make       | Model Year      | Model           | New Vehicle Limited Warranty | Extended Warranty | Classification |
|------------|-----------------|-----------------|------------------------------|-------------------|----------------|
| Volkswagen | 2018            | Atlas           | 6 Years / 72,000 Miles       | N/A               | VW Peer        |
| Volkswagen | 2010, 2012-2017 | Beetle          | 3 Years / 36,000 Miles       | N/A               | VW Peer        |
| Volkswagen | 2018            | Beetle          | 6 Years / 72,000 Miles       | N/A               | VW Peer        |
| Volkswagen | 2015-2018       | eGolf           | 3 Years / 36,000 Miles       | N/A               | VW Peer        |
| Volkswagen | 2017            | Golf Alltrack   | 3 Years / 36,000 Miles       | N/A               | VW Peer        |
| Volkswagen | 2018            | Golf Alltrack   | 6 Years / 72,000 Miles       | N/A               | VW Peer        |
| Volkswagen | 2015-2017       | Golf Sportwagen | 3 Years / 36,000 Miles       | N/A               | VW Peer        |
| Volkswagen | 2018            | Tiguan          | 6 Years / 72,000 Miles       | N/A               | VW Peer        |
| Volkswagen | 2010-2017       | Touareg         | 3 Years / 36,000 Miles       | N/A               | VW Peer        |
| Audi       | 2010-2013       | A3              | 4 Years / 50,000 Miles       | N/A               | Audi Peer      |
| Audi       | 2015-2018       | A3              | 4 Years / 50,000 Miles       | N/A               | Audi Peer      |
| Audi       | 2010-2018       | A4              | 4 Years / 50,000 Miles       | N/A               | Audi Peer      |
| Audi       | 2010-2018       | A5              | 4 Years / 50,000 Miles       | N/A               | Audi Peer      |
| Audi       | 2010-2018       | A6              | 4 Years / 50,000 Miles       | N/A               | Audi Peer      |
| Audi       | 2012-2018       | A7              | 4 Years / 50,000 Miles       | N/A               | Audi Peer      |
| Audi       | 2010-2018       | A8              | 4 Years / 50,000 Miles       | N/A               | Audi Peer      |
| Audi       | 2015-2018       | Q3              | 4 Years / 50,000 Miles       | N/A               | Audi Peer      |
| Audi       | 2010-2018       | Q5              | 4 Years / 50,000 Miles       | N/A               | Audi Peer      |
| Audi       | 2010-2015       | Q7              | 4 Years / 50,000 Miles       | N/A               | Audi Peer      |
| Audi       | 2017-2018       | Q7              | 4 Years / 50,000 Miles       | N/A               | Audi Peer      |
| Audi       | 2010-2012       | R8              | 4 Years / 50,000 Miles       | N/A               | Audi Peer      |
| Audi       | 2014-2015       | R8              | 4 Years / 50,000 Miles       | N/A               | Audi Peer      |
| Audi       | 2017-2018       | R8              | 4 Years / 50,000 Miles       | N/A               | Audi Peer      |
| Audi       | 2010-2012       | S5              | 4 Years / 50,000 Miles       | N/A               | Audi Peer      |
| Audi       | 2010-2011       | S6              | 4 Years / 50,000 Miles       | N/A               | Audi Peer      |
| Audi       | 2010-2018       | TT              | 4 Years / 50,000 Miles       | N/A               | Audi Peer      |

Source: VWGoA

Date Gathered: Through the date of the inquiry

Request 7

7. Produce copies of all service, warranty, and other documents that relate to, or may relate to, the alleged defect in the subject vehicles and peer 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

Response due on or before August 17, 2018



Request 8

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 or peer 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

Partial response due on August 03, 2018

Complete response due on or before August 17, 2018



Request 9

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 or peer vehicles. For each such modification or change, provide the following information:
- The date or approximate date on which the modification or change was incorporated into vehicle production;
  - A detailed description of the modification or change;
  - The reason(s) for the modification or change;
  - The part number(s) (service and engineering) of the original component;
  - The part number(s) (service and engineering) of the modified component;
  - Whether the original unmodified component was withdrawn from production and/or sale, and if so, when;
  - When the modified component was made available as a service component; and
  - 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 provides the following table in response to Request 9, listing the requested information for subparagraphs a. – h. for each applicable version of clock spring design:

| Req | 1) Valeo Robust Design  | 2) Valeo Ring   | 3) Valeo New Design  | Kostal (new grease/cable combination)   |
|-----|---|---|--|---|
| a.  | CW50/12   | CW 45/16  | CW50/17 for new models only (new design started with introduction of 2019 MY Jetta)                      | Modifications occurred during 2010, dependent on Part Number                      |
| b.  | Robust design against ingress of contamination                                    | Additional increase for robustness  | New development of complete new design   | New grease/cable combination  |
| c.  | Analysis results showed possible contamination with hair and fiber                | Despite decreasing numbers for failing clock springs due to the implementation of the robust design, analysis results showed that robust design still left possibility for hair and fiber to enter clock spring | Change to a different design that eliminates the consequences if hair or fiber entering the clock spring | Noise reduction, improved roll motion   |
| d.  | Please reference enclosed excel file and the individual tabs "VWAG" and "Audi AG" | Please reference enclosed excel file and the individual tabs "VWAG" and "Audi AG"   | Please reference enclosed excel file and the individual tabs "VWAG" and "Audi AG"                        | Please reference enclosed excel file and the individual tabs "VWAG" and "Audi AG" |
| e.  | Please reference enclosed excel file and the individual tabs "VWAG" and "Audi AG" | Please reference enclosed excel file and the individual tabs "VWAG" and "Audi AG"   | Please reference enclosed excel file and the individual tabs "VWAG" and "Audi AG"                        | Please reference enclosed excel file and the individual tabs "VWAG" and "Audi AG" |

Response 9 cont'd.

| Req | 1) Valeo Robust Design   | 2) Valeo Ring  | 3) Valeo New Design  | Kostal (new grease/cable combination)  |
|-----|--|--|--|--|
| f.  | Running change in production   | Introduction of an additional ring, no withdrawal from production necessary  | New design was introduced in 2019 MY Jetta. Not interchangeable, therefore no withdrawal necessary | Running change in production   |
| g.  | When modified clock springs were approved, both service parts and production parts were available simultaneously | When modified clock springs were approved, both service parts and production parts were available simultaneously   | New design was introduced in 2019 MY Jetta. New service parts were available at the same time.     | When modified clock springs were approved, both service parts and production parts were available simultaneously |
| h.  | Robust design is backwards compatible for use on vehicles equipped with original design clock springs            | The introduction of the "ring" in production is not backwards compatible to all models with the previous "robust" design, due to possible interference with the steering wheel.<br><br>Depending of the steering wheel design/model, modifications are necessary to fit an additional ring | Not interchangeable with any previous model/vehicle  | No part number change for individual part numbers (running change) and is interchangeable                        |

**Overview of Valeo Changes**

Production:

| 2010                 | CW50/2012                     | CW45/16   | CW50/17 - Jetta            |
|----------------------|-------------------------------|---|----------------------------|
| Initial construction | Robust with labyrinth V12DE12 | Robust with labyrinth + ring (def. change requests) | New clock-spring (LIN-Bus) |

Reason of modification:

| 2010 | 2011 | 2012 | 2013 | 2014  | 2015 | 2016 | 2017                               | 2018  |
|------|------|------|------|---|------|------|------------------------------------|---|
|      |      |      |      | Robust design against ingress of conformation |      |      | Additional increase for robustness | Development of a complete new clock-Spring design |

Volkswagen does not have additional modifications or changes currently planned for incorporation into vehicle production within the next 120 days.

For responses to subparagraphs "d" and "e," please reference the Microsoft Excel file entitled "Part Number Applications.xlsx" in the folder attached hereto as Exhibit to Request 9.

Exhibit to Request 9

PART NUMBER APPLICATION

Data is provided in the files labeled as "Part Number Application.xlsx", in Microsoft Excel format in the Exhibit to Request 9 folder on the enclosed EA18-003 electronic media

#### Request 10

10. Produce the following:

- a. Drawings of the subject component(s) supplied to VW for use in the subject vehicles;
- b. Drawings of the subject component(s) supplied to VW for use in the peer vehicles;
- c. Two (2) exemplar samples of the design version of the subject component(s);
- d. The most current Design and Process Failure Mode and Effects Analysis (FMEA) that refers or relates to the design and development of the subject component(s) used in the subject vehicles and peer vehicles; and
- e. Design and performance standards, parameters, requirements for the subject component(s) as used in the subject and peer vehicles.

#### Response 10

Volkswagen notes that in response to subparagraphs "a." and "b.", the requested information is not yet available from either supplier for the partial response due July 20, 2018.

Response to Request 10 subparagraph "c" was provided to the attention of Ms. Sharon Yukevich, via FedEx shipment, tracking number: 7726 5010 4096. FedEx confirmed delivery on Monday, July 09, 2018 at 11:53 AM.

The following exemplar samples of the various design versions were included in the aforementioned shipment:

| Part Number | Supplier | Qty | Model     | Model Year |
|-------------|----------|-----|-----------|------------|
| 5K0953549B  | Valeo    | 2   | Jetta     | 2011-2014  |
|             |          |     | Golf      | 2010-2014  |
|             |          |     | Eos       | 2011-2016  |
| 5Q0953549E  | Kostal   | 2   | Golf      | 2014-      |
| 3C0959653B  | Kostal   | 2   | Passat/CC | 2010-2012  |
| 5K0953569AS | Valeo    | 2   | CC        | 2012-2017  |
| 5K0953549A  | Valeo    | 2   | Golf      | 2010-2013  |
|             |          |     | Jetta     | 2011-2014  |
|             |          |     | Eos       | 2011-2016  |
| 1K0959653C  | Kostal   | 2   | Golf      | 2010-2014  |
|             |          |     | Eos       | 2010-2011  |
|             |          |     | Jetta     | 2010       |
|             |          |     | Tiguan    | 2010-2011  |
| 5C0959653   | Valeo    | 2   | Jetta     | 2011-2018  |
| 5C0959654A  | Valeo    | 2   | Jetta     | 2011-2018  |
| 1K0959653D  | Kostal   | 2   | Golf      | 2010       |
|             |          |     | Jetta     | 2010       |

Response 10 cont'd.

Volkswagen notes that in response to subparagraphs "d.", the requested information is not yet available from either supplier for the partial response due July 20, 2018.

Volkswagen notes that in response to subparagraphs "e.", the required translations of the requested drawings are not yet available for the partial response due July 20, 2018.

Per Volkswagen's outreach to the agency on July 19, 2018, it is agreed that the information for subparagraphs "a.", "b.", "d.", and "e." will be incorporated into Volkswagen's response by August 03, 2018.



#### Request 11

11. State the number of each of the following that VW has sold that may be used in the subject vehicles or peer 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(s); and
  - 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 a Microsoft Excel file, entitled "PART SALES.xlsx" in the folder attached hereto as Exhibit to Request 11.

Volkswagen notes the part sales information is inclusive of service part components utilized during the 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, "SUPPLIER-CONTACT\_VALEO.xlsx" and "SUPPLIER-CONTACT\_KOSTAL.xlsx", in the folder attached hereto as Exhibit to Request 11.

Clock spring application information, specific to model and model year of the vehicle in which it is used, is included on the adjacent tabs contained in the aforementioned supplier contact files.

Source: Volkswagen

Date Gathered: Through the date of the inquiry

Exhibit to Request 11

PART SALES

&

SUPPLIER-CONTACT\_VALEO;  
SUPPLIER-CONTACT\_KOSTAL

Data is provided in Microsoft Excel format in the Exhibit to Request 11 folder  
on the enclosed EA18-003 electronic media

**Attachment 1**

| Make       | Model            | 2010    | 2011    | 2012    | 2013    | 2014    | 2015    | 2016    | 2017    | 2018    | 2019   | Total Of VIN | Classification |
|------------|------------------|---------|---------|---------|---------|---------|---------|---------|---------|---------|--------|--------------|----------------|
| Audi       | A3               | 4,595   | 6,733   | 7,265   | 3,719   |         | 46,733  | 39,405  | 22,725  | 20,620  |        | 151,795      | Audi Peer      |
|            | A4               | 31,082  | 35,281  | 31,571  | 46,719  | 42,252  | 31,709  | 20,490  | 53,444  | 37,605  |        | 330,153      | Audi Peer      |
|            | A5               | 11,866  | 12,950  | 11,470  | 21,818  | 19,145  | 13,174  | 10,365  | 3,242   | 39,799  |        | 143,829      | Audi Peer      |
|            | A6               | 6,777   | 7,108   | 18,371  | 21,072  | 23,927  | 15,800  | 30,483  | 16,973  | 16,429  |        | 156,940      | Audi Peer      |
|            | A7               |         |         | 11,768  | 7,733   | 9,357   | 3,632   | 11,342  | 6,144   | 4,269   |        | 54,245       | Audi Peer      |
|            | A8               | 649     | 4,750   | 4,539   | 6,650   | 5,574   | 7,141   | 4,044   | 4,210   | 761     |        | 38,318       | Audi Peer      |
|            | Q3               |         |         |         |         |         | 10,518  | 20,195  | 14,618  | 29,498  |        | 74,829       | Audi Peer      |
|            | Q5               | 18,887  | 23,731  | 33,831  | 28,565  | 42,005  | 48,819  | 54,702  | 35,524  | 78,073  |        | 364,137      | Audi Peer      |
|            | Q7               | 6,181   | 9,038   | 8,951   | 14,277  | 17,879  | 28,909  |         | 51,661  | 39,728  |        | 176,624      | Audi Peer      |
|            | R8               | 546     | 1,416   | 1,272   |         | 1,113   | 722     |         | 1,532   | 594     |        | 7,195        | Audi Peer      |
|            | S5               | 2,627   | 2,463   | 2,413   |         |         |         |         |         |         |        | 7,503        | Audi Peer      |
|            | S6               | 140     | 159     |         |         |         |         |         |         |         |        | 299          | Audi Peer      |
|            | TT               | 1,201   | 1,434   | 2,259   | 2,191   | 1,221   | 750     | 3,503   | 2,189   | 2,119   |        | 16,867       | Audi Peer      |
| Volkswagen | Atlas            |         |         |         |         |         |         |         |         | 61,927  |        | 61,927       | VW Peer        |
|            | Beetle           | 16,832  |         | 30,438  | 47,732  | 27,709  | 20,354  | 17,744  | 17,126  | 10,749  |        | 188,684      | VW Peer        |
|            | CC               | 29,078  | 12,987  | 29,352  | 32,257  | 10,893  | 5,254   | 3,859   | 1,837   |         |        | 125,517      | RQ17 / Subject |
|            | E-Golf           |         |         |         |         |         | 3,370   | 7,892   | 1,742   | 489     |        | 13,493       | VW Peer        |
|            | Eos              | 5,751   | 1,877   | 11,117  | 4,775   | 3,409   | 2,742   | 1,136   |         |         |        | 30,807       | RQ17 / Subject |
|            | Golf             | 12,519  | 16,563  | 25,060  | 21,455  | 6,916   | 28,751  | 21,837  | 22,445  | 9,241   |        | 164,787      | RQ17 / Subject |
|            | Golf Alltrack    |         |         |         |         |         |         |         | 24,283  | 8,684   |        | 32,967       | VW Peer        |
|            | Golf SportWagen  |         |         |         |         |         | 16,404  | 19,123  | 10,096  |         |        | 45,623       | VW Peer        |
|            | GTI              | 12,268  | 15,128  | 18,566  | 17,168  | 5,082   | 27,814  | 24,616  | 32,624  | 9,108   |        | 162,374      | RQ17 / Subject |
|            | Jetta            | 98,166  | 122,123 | 154,410 | 148,325 | 157,878 | 117,813 | 125,463 | 141,641 | 31,691  | 19,804 | 1,117,314    | RQ17 / Subject |
|            | Jetta Sportwagen | 25,361  | 26,162  | 23,684  | 27,780  | 25,017  |         |         |         |         |        | 128,004      | RQ17 / Subject |
|            | Passat (Germany) | 13,204  |         |         |         |         |         |         |         |         |        | 13,204       | RQ17 / Subject |
|            | Passat (USA)     |         |         | 95,836  | 128,807 | 102,124 | 98,078  | 57,434  | 76,532  | 34,844  |        | 593,655      | RQ17 / Subject |
|            | Tiguan           | 17,460  | 25,618  | 29,806  | 33,457  | 26,030  | 22,513  | 44,602  | 51,081  | 88,076  |        | 338,643      | RQ17 / Subject |
|            | Touareg          | 3,493   | 6,058   | 10,399  | 9,583   | 9,715   | 3,964   | 8,274   | 5,105   |         |        | 56,591       | VW Peer        |
| Sum:       |                  | 318,683 | 331,579 | 562,378 | 624,083 | 537,246 | 554,964 | 526,509 | 596,774 | 524,304 | 19,804 | 4,596,324    |                |