

VOLKSWAGEN

GROUP OF AMERICA

Stephen Ridella
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1200 New Jersey Avenue S.E.
Washington, DC 20590

Christopher T. Sandvig NAME
Director Title
Group Customer Protection Department
248-754-5000 Phone
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January 29, 2021 Date

Subject: EA18-003: Clock Spring
2010 MY to 2018 MY Certain Volkswagen and Audi Vehicles

VOLKSWAGEN GROUP OF AMERICA, INC.
3800 HAMLIN ROAD
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Dear Mr. Ridella:

Please find enclosed Volkswagen's response to EA18-003, dated December 30, 2020, 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 inquiry further states the agency seeks additional information to include data from repairs performed under VW's extended warranty program, as set forth in Volkswagen's letter to ODI dated September 20, 2018, covering the subject vehicles, in ODI's analysis of the SCCM performance.

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

1. State, by model and model year, the number of subject vehicles VW has manufactured for sale or lease in the United States. Separately, for each subject 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:

- 2010MY – 2014 MY Volkswagen CC
- 2010MY – 2016MY Volkswagen Eos
- 2011MY – 2018MY Volkswagen Golf/GTI
- 2010MY – 2014MY Volkswagen Jetta
- 2011MY – 2018MY Volkswagen Jetta Sportwagen*
- 2012MY – 2018MY Volkswagen Passat (US Production)**
- 2010MY Volkswagen Passat, Passat Wagon (German Production)**
- 2010MY – 2018MY Volkswagen Tiguan
- 2014MY – 2018MY Audi Q3***

Due to the size of the response file, an overview of the population of subject vehicles is provided in table form in Attachment 1.

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

Volkswagen notes that for VINs without supplier and/or part number information, the information was not present or available in Volkswagen's production management system. In cases where the missing information could be updated based on the known supplier, the clock spring base part number is provided with an asterisk, as the exact part number installed at production was not recorded.

Response 1 cont'd.

For the purpose of this inquiry, the subject vehicle population, 2010-2014 MY CC, Passat, Eos, Golf, GTI, Jetta, Jetta Sportwagen and Tiguan vehicles, are designated in the population file with a 'yes' as being subject to recall 15V-483 / 69L2.

Subject vehicles covered under recall 15V-483 / 69L2 are also covered under a warranty extension and are designated in the population file with the notation "WECI".

The 2015 - 2018MY Audi Q3 is covered under a warranty extension and is designated in the population file with the notation "WECR".

Certain 2010 - 2018MY Volkswagen subject vehicles not covered under recall 15V-483 / 69L2 are covered under a warranty extension and are designated in the population file with the notation "WECY".

Warranty Extension Information

- WECI: 2010 - 2014 MY Volkswagen Models under Recall 15V-483 / 69L2 - Warranty Extension for 15 Years / Unlimited Miles, from the vehicles original in-service date
- WECR: 2015 - 2018 MY Audi Q3 - Warranty Extension for 10 Years / 120,000 Miles, whichever occurs first, from the vehicles original in-service date
- WECY: 2010 - 2018 MY Volkswagen Models not under Recall 15V-483 / 69L2 - Warranty Extension for 10 Years / 120,000 Miles, whichever occurs first, from original in service date

The vehicle population 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 vehicles requested.

For the purpose of this inquiry, the following information is provided to clarify the availability / non-availability of certain models in the US market, identified as subject vehicles in the IR Letter:

- 2015 - 2018MY Jetta Sportwagen was discontinued in the US market*
- 2012 - 2018MY Passat was produced in the US for the US market**
- 2011MY Passat or Passat Wagon was not available for sale in the US market
- 2010MY Passat and Passat Wagon were produced in Germany for the US market**
- 2014MY Audi Q3 was not available for sale in the US market***

Source: Business Objects Vehicles Universe

Date Gathered: Through the date of the inquiry (12/31/2020)

Exhibit to Request 1

PRODUCTION DATA

Data is provided in Microsoft Access format in the Exhibit to Request 1 folder submitted in response to EA18-003. The file is labeled:

PRODUCTION DATA. accdb

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:
 - 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 2,312 consumer complaints on 2,234 unique vehicles, related to the alleged defect in the subject vehicles;
- b. In response to this inquiry, Volkswagen has identified 189 field reports on 170 unique vehicles, related to the alleged defect in the subject vehicles;
- c. In response to this inquiry, Volkswagen has identified 6 allegations involving a crash, 2 allegations of injury and no fatalities related to the alleged defect in the subject vehicles. These allegations are summarized in a document titled “Alleged Accident and Injury Summary Assessment” provided in response to Request No. 4;
- d. In response to this inquiry, Volkswagen has not identified any property damage claims related to the alleged defect in the subject vehicles;
- 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: Business Objects Customer Care, MED/ARB, PAG, FRED, FTIS, TACS
Date Gathered: Through the date of the inquiry (12/31/2020)

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. Clock spring manufacturer;
 - h. Clock spring part number;
 - i. Incident date;
 - j. Report or claim date;
 - k. Whether a crash is alleged;
 - l. Whether property damage is alleged;
 - 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 the file entitled REQUEST NUMBER TWO DATA.xlsx in the folder provided 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 submitted in response to EA18-003. The file is labeled:

REQUEST NUMBER TWO DATA.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, Jetta; 2010-2016 Model Year (MY) Eos; 2011-2018 Model Year (MY) Golf/GTI, Jetta Sportwagen; 2010 Model Year (MY) Passat, Passat Wagon; 2012-2018 Model Year (MY) Passat, 2010-2018 Model Year (MY) Tiguan and 2015-2018 Model Year (MY) Audi Q3 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 inquiry (EA18-003).
- 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):
 - B100001B – 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 alleged defect, “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.” Additional criteria included screening for statements related to an indication that the airbag light indicator was ON.

Responsive documents to Request No. 2 subparagraphs “a”, “b”, and “c” are provided in the file entitled REQUEST NUMBER TWO DATA.pdf in the folder provided as Exhibit to Request 4. In response to subparagraph “c,” VW has created and submitted a document titled, “Alleged Accident and Injury Summary Assessment.”

Records are organized by case number, then by category.

There are no responsive documents to Request No. 2 subparagraphs “d”, “e” and “f”.

Source, Date Gathered: See Response 2

Exhibit to Request 4

REQUEST NUMBER TWO DOCUMENTS

Data is provided in Adobe Acrobat format or native file format in the Exhibit to Request 4 folder submitted in response to EA18-003. The files / folders are labeled:

REQUEST NUMBER TWO DATA.pdf

PAG Documents

Alleged Accidents and Injury Summary Assessment.pdf

[REDACTED]	WVWBW7AH7CV	[REDACTED]	(Folder)
[REDACTED]	_1VWBS7A30EC	[REDACTED]	(Folder)
[REDACTED]	_1VWAT7A3XGC	[REDACTED]	(Folder)
[REDACTED]	_WVGAV3AX8EW	[REDACTED]	(Folder)
[REDACTED]	_1VWAP7A30CC	[REDACTED]	(Folder)
[REDACTED]	_WVGRV7AX2HK	[REDACTED]	(Folder)

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: 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. Replaced clock spring manufacturer;
- f. Replaced clock spring part number;
- g. Replacement clock spring manufacturer;
- h. Replacement clock spring part number;
- i. Recall 15V-483 Remedy Repair (Yes or No);
- j. Recall 15V-483 Remedy Performed (Shield, Module Replacement or Not Applicable);
- k. Extended warranty repair (Yes or No);
- l. Other type of claim;
- m. Previous clock spring repair (Yes or No);
- n. Vehicle mileage at time of repair;
- o. Repairing dealer's or facility's name, telephone number, city and state or ZIP code;
- p. Diagnostic trouble code(s);
- q. Concern stated by customer;
- r. Cause as stated on the repair order;
- s. Corrective action as stated on the repair order;
- t. 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 23,552 warranty claims on 22,088 unique vehicles related to the alleged defect in the subject vehicles. Volkswagen notes that 522 claims are duplicative of consumer complaints and 139 claims are duplicative of field reports.

Response 5 cont'd.

Additionally, Volkswagen has identified 21,643 recall claims completed on subject vehicles under recall 15V-483 / 69L2 during the period of the inquiry.

Overall, 376,172 vehicles have been repaired under recall 15V-483 / 69L2, for a completion rate of 90.5%.

Responses to subparagraphs “a” through “t” are provided in the file entitled WARRANTY DATA.xlsx; information related to the recall claims are provided in the file entitled 15V-483_69L2_Summary.xlsx. Both files are contained in the folder provided 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 (12/31/2020)

Exhibit to Request 5

WARRANTY DATA

Data is provided in Microsoft Excel format in the Exhibit to Request 5 folder submitted in response to EA18-003. The files are labeled:

WARRANTY DATA.xlsx
15V-483_69L2_Summary.xlsx

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 diagnostic trouble codes, part numbers and any other pertinent parameters used.

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): All 2010-2014 Model Year (MY) CC, Jetta; 2010-2016 Model Year (MY) Eos; 2011-2018 Model Year (MY) Golf/GTI, Jetta Sportwagen; 2010 Model Year (MY) Passat, Passat Wagon; 2012-2018 Model Year (MY) Passat, 2010-2018 Model Year (MY) Tiguan and 2015-2018 Model Year (MY) Audi Q3 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 (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 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):
 - B100001B – 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.

The individual claims were manually screened to identify those which contained customer concerns related to the subject alleged defect, “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.” Additional criteria included screening for statements related to an indication that the airbag light indicator was ON.

Source: VWGoA

Date Gathered: Through the date of the inquiry (12/31/2020)

Summary

The evaluation of all documents collected during this inquiry (EA18-003) confirms the Failure Mechanism, Mode and Causal or Contributory Factors provided in previous responses RQ17-009, PE15-010 and EA18-003 (August 2018).

Clock spring failures were primarily caused by contamination of the internal mechanism with hair or fabric strands/filaments for parts designed by one specific supplier.

Assessment

A fracture of the clock spring flat cable can only occur when the steering wheel is significantly turned, typically occurring during low speed maneuvers. As the airbag warning light illuminates immediately, the driver is alerted about the malfunction and directed to bring the vehicle immediately into a workshop for inspection, as stated in the owner's manual. Other functions on the steering wheel may be affected, such as cruise control, radio and/or phone operation, etc., and could be an additional reason for the driver to visit a workshop.

The failure of a clock spring does not impair vehicle control or drivability (steering, brakes, acceleration). Indeed, the clock spring flat cable is designed to break with minimal force to prevent obstructions when turning the steering wheel. A flat cable not designed to tear in this manner could impede steering wheel movement, thus affecting vehicle controllability.

Volkswagen has not identified an unreasonable risk to motor vehicle safety related to the alleged defect of the steering wheel clock spring in the subject and peer vehicles.

Attachment 1

Make	Model	Total Of VIN	2010	2011	2012	2013	2014	2015	2016	2017	2018
Audi	Q3	74,829						10,518	20,195	14,618	29,498
Volkswagen	CC	125,517	29,078	12,987	29,352	32,257	10,893	5,254	3,859	1,837	
	Eos	30,807	5,751	1,877	11,117	4,775	3,409	2,742	1,136		
	Golf	164,789	12,519	16,563	25,060	21,455	6,916	28,751	21,837	22,445	9,243
	GTI	162,374	12,268	15,128	18,566	17,168	5,082	27,814	24,616	32,624	9,108
	Jetta	680,902	98,166	122,123	154,410	148,325	157,878				
	Jetta Sportwagen	128,004	25,361	26,162	23,684	27,780	25,017				
	Passat (Germany)	10,243	10,243								
	Passat (USA)	593,657			95,838	128,807	102,124	98,078	57,434	76,532	34,844
	Passat Wagon (Germany)	2,961	2,961								
	Tiguan	338,645	17,460	25,618	29,807	33,457	26,030	22,513	44,602	51,081	88,077
	SUM:	2,312,728	213,807	220,458	387,834	414,024	337,349	195,670	173,679	199,137	170,770

Subject Vehicles as Listed in IR Letter:

- o 2010MY – 2017MY Volkswagen CC
- o 2010MY – 2016MY Volkswagen Eos
- o 2011MY – 2018MY Volkswagen Golf/GTI
- o 2010MY – 2014MY Volkswagen Jetta
- o 2011MY – 2018MY Volkswagen Jetta Sportwagen*
- o 2010MY – 2018MY Volkswagen Passat**
- o 2010MY Volkswagen Passat Wagon**
- o 2010MY – 2018MY Volkswagen Tiguan
- o 2014MY – 2018MY Audi Q3***

Notes:

- * Jetta Sportwagen in US market through 2014 MY; beginning in 2015 MY the Golf Sportwagen was in the US market
- ** 2010 MY Passat (German production); there was not a 2011 MY Passat; beginning in 2012 MY the Passat was US production
- ** 2010 MY Passat Wagon (German production); after 2010 MY there was not a Passat Wagon offered in the US market
- *** There was not a 2014 MY Audi Q3 available in the US market; the 2015 MY was the first year Audi Q3 offered in the US market