VOLKSWAGEN

GROUP OF AMERICA

Stephen Ridella
Director
Office of Defects Investigation
U.S. Department of Transportation
National Highway Traffic Safety Administration
1200 New Jersey Avenue S.E.
Washington, DC 20590

Christopher T. Sandvig NAME
Director Title
Group Customer Protection Department
248-754-5000 Phone
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June 30, 2020 Date

Subject: EA18-005 2018 MY Volkswagen Tiguan – Seat Belt Webbing Separation

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

Please find enclosed Volkswagen's initial and partial response to EA18-005, dated May 28, 2020, requesting information concerning allegations of seat belt webbing separation in certain model year (MY) 2018 Tiguan vehicles. Additionally, the inquiry expanded the scope to include the following peer vehicles: 2015 MY to present Volkswagen and Audi vehicles equipped with a CLT or flexible seat belt buckle stalk or both.

Thank you for your approval of Volkswagens request of June 24, 2020 for a partial extension of time to respond to the Office of Defects Investigation (ODI) Information Request letter for EA18-005 to July 22, 2020.

As was agreed, Volkswagen will provide to the agency submissions weekly beginning July 10, 2020, until completion, on or before July 22, 2020.

We note that while the agency upgraded the investigation on July 3, 2018, after Volkswagen's response to the Information Request associated with the Preliminary Evaluation, Volkswagen believed in good faith that ODI was reviewing and considering the information previously provided, as well as Volkswagen's conclusion that the separation of the seat belt webbing that occurred in the 2018 NCAP tests was the result of the way in which the ADT cable was routed and does not reflect a potential unreasonable risk to motor vehicle safety in the real world.

ODI reached out to Volkswagen in May 2020, met with the company on May 28, and issued the current Information Request that same day. Volkswagen will provide more complete information as communicated to ODI and will, beyond that, supplement its response with additional information, if necessary.

In the enclosed response, Volkswagen explains the sled testing series in more detail, noting that while the first two of the test series were intended to evaluate whether or not the ATD

cable routing was the likely cause of the belt separation in the 2018 NCAP tests, the third series of test was aimed at collecting initial data should further countermeasure development be needed. The testing aimed at understanding the impact of the ATD cable confirms that the belt separation in two NHTSA NCAP tests was the result of the way in which the NCAP testing was conducted and is not representative of collision risks in consumer use.

Volkswagen also understands, based on its conversation with ODI on May 28, 2020, that ODI has questions with regard to the efficacy of Crash Locking Tongues (CLT) – which is a relatively new technology – and some of the choices embedded in the VW design in particular. Volkswagen addresses ODI's questions and explains how various of the design choices in fact help reduce the potential for webbing bunching and/or adverse consequences should bunching occur.

Significantly, since ODI reached out to Volkswagen, the company has commissioned a comprehensive review of the field experience of the MY 2018 Tiguan and peer vehicles from a spectrum of manufacturers with competitor vehicles in the U.S. market (referred to herein as "Market Peers", as opposed to the "peer vehicles" defined in the current Information Request). That review has thus far found that the Tiguan compares favorably in real world and comparative testing with the Market Peers (see Response to Request No. 10 below).

Volkswagen has received NO reports of any occurrences in the field similar to NHTSA's anomalous NCAP tests. Volkswagen has commissioned Exponent, Inc. to identify potential field crashes by reviewing salvage yard websites and obtaining (to the extent available) seat belt componentry from vehicles involved in frontal crashes. That review did not identify any indication of a real world failure replicating the results of the NHTSA's anomalous NCAP tests.

These analyses have confirmed that the webbing separations from NHTSA's early 2018 NCAP tests are anomalies associated with the dynamic interaction of the ATD cable routed inboard and adjacent to the driver's seat belt buckle and latch plate; absent that dynamic interaction, the belt would not have experienced the incremental loading of the cable that led to the belt failure.

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,

[redacted]

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Christopher T. Sandvig
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Volkswagen Group of America, Inc.

Enclosures