INFORMATION REDACTED PURSUANT TOTHE FREEDOM
OF INFORMATION ACT (FOIA), 5 U.S.C.552(B)(6)

VOLKSWAGEN
GROUP OF AMERICA

Tanya Topka
Chief, Vehicle Defect Division A
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
248-754-5093 Fax
May 28, 2021 Date

Subject: PE21-008 (NEF101SAH)

Dear Ms. Topka:

VOLKSWAGEN GROUP OF AMERICA, INC.
3800 HAMLIN ROAD
AUBURN HILLS, MI 48326
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Please find enclosed Volkswagen's partial response to PE21-008, dated April 01, 2021, requesting information concerning allegations of the fuel injection system leaking at or near the fuel injectors in certain model year (MY) 2018-2020 Volkswagen Atlas vehicles.

Thank you for your approval of Volkswagen's request of May 21, 2021 for an extension for a response to Request 8, due to the volume of native language documents required to be translated into English.

As was agreed, Volkswagen will provide to the agency a final supplemental submission on or before July 09, 2021. It was further agreed, that Volkswagen will provide a weekly status update to ensure the extension date will be met.

For your convenience, each request is restated verbatim and then followed by our response.

The response to Request 9 was forwarded to NHTSA's Office of General Counsel under request for confidentiality and therefore is not included with the response documents.

Please contact me if you have any questions regarding this response.

Sincerely

[redacted]

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

Enclosures

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, 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. Date of manufacture;
g. Date warranty coverage commenced; and
h. 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 subject vehicles identified in PE21-008.

Population data is provided for 2018-2020 Model Year (MY) Volkswagen Atlas and 2020 MY Atlas Cross Sport 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.

Model	2018	2019	2020	Grand Total
ATLAS 2.0T	7,741	6,452	2,216	16,409
ATLAS 3.6L	76,448	94,617	3,998	175,063
ATLAS CROSS SPORT 2.0T			9,214	9,214
ATLAS CROSS SPORT 3.6L			20,332	20,332
Grand Total	**84,189**	**101,069**	**35,760**	**221,018**

Please reference the files entitled "PRODUCTION DATA.xlsx" for the subject vehicles, in response to subparagraphs "a" through "h," in the folder attached hereto as Exhibit to Request 1.

Source: Business Objects Vehicles Universe

Date Gathered: Through the date of the inquiry (April 01, 2021)

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. Reports involving a fire;
e. Reports involving any other fuel leak in the engine compartment not related to the subject component;
f. Property damage claims;
g. Third-party arbitration proceedings where VW is or was a party to the arbitration; and
h. Lawsuits, both pending and closed, in which VW is or was a defendant or codefendant.

For subparts "a" through "h" 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 "h" 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 "g" and "h" 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 items "a" through "h" include multiple reporting about the same underlying incident; the counts are not additive, as a false total count would result.

a. In response to this inquiry, Volkswagen has identified 9 consumer complaints which relate to, or may relate to, the alleged defect in the subject vehicles;
b. In response to this inquiry, Volkswagen has identified 60 field reports which relate to, or may relate to, the alleged defect in the subject vehicles;
c. In response to this inquiry, Volkswagen has not received any reports involving a crash, injury or fatality, or notices/claims of injury or death alleging or proving that a death or injury was caused by, or alleged to have been caused by, the alleged defect in the subject vehicles. Further, Volkswagen has not received any property damage claims, consumer complaints, or field reports involving or referring to a death or injury related to the alleged defect in the subject vehicles;
d. In response to this inquiry, Volkswagen has not identified any fires;
e. In response to this inquiry, Volkswagen has identified 126 reports involving any other fuel leak in the engine compartment not related to the subject component;
f. In response to this inquiry, Volkswagen has not identified any property damage claims;
g. In response to this inquiry, Volkswagen has not identified any third-party arbitration proceedings where VW is or was a party to the arbitration;
h. In response to this inquiry, Volkswagen has not identified any lawsuit, in which VW is or was a defendant or codefendant.

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 other 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. Incident date;
h. Report or claim date;
i. Whether a crash is alleged;
j. Whether a fire is alleged;
k. Whether property damage is alleged;
l. Number of alleged injuries, if any; and
m. 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 items "a" through "m" are provided in a file entitled, "REQUEST NUMBER TWO DATA.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

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 in response to Request 2:

- Identify 2018-2020 Model Year (MY) Volkswagen Atlas and 2020 MY Atlas Cross Sport vehicles manufactured and sold to Volkswagen Group of America, Inc. for resale or lease in the United States; and

- Identify the service part number(s) related to the subject component (fuel injector) in the subject vehicles; and

- Indicated a fuel injector external leak

The individual records were manually screened to identify those which contained comments which relate to, or may relate to, the alleged defect, "malfunction of the [fuel injector] that leads to a leak in the engine compartment".

Volkswagen further notes that it has included reports responsive to item 2e. in Response 3 and Response 4, although they do not relate to, or may not relate to, the alleged defect in the subject vehicles.

Documents are provided in an Adobe Acrobat file, entitled "REQUEST NUMBER TWO DATA.pdf", in the folder attached hereto as Exhibit to Request 4. Records are organized chronologically by case number, then by category.

Source, Date Gathered: See Response 2

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. Vehicle mileage at time of repair;
f. Repairing dealers or facility's name, telephone number, city and state or ZIP code;
g. Labor operation number(s);
h. Problem code(s);
i. Diagnostic trouble code(s);
j. Replacement part number(s) and description(s);
k. Location of replaced part (i.e. which cylinder nozzle or cylinder bank);
l. Concern stated by customer;
m. Cause as stated on the repair order;
n. Correction as stated on the repair order; and
o. 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

In response to this inquiry, Volkswagen has identified 120 warranty claims on 117 unique VINs that relate to, or may relate to, the alleged defect in the subject vehicles. Volkswagen further notes that 14 of these warranty claims are duplicative of consumer complaints and 38 are duplicative of field reports.

The 2018-2020 MY Atlas and 2020 MY Atlas Cross Sport are available in the U.S. market with two different engines: the 2.0L engine (235hp) built in Silao, Mexico with the engine design EA888, and the 3.6L engine (276hp) built in Salzgitter, Germany with the engine design EA390. Due to the different engine displacements, the fuel injectors are different in design, have unique part numbers, and are manufactured by two different suppliers. Therefore, the underlying cause of a possible fuel injector failure, as well as the rate of replacement, must be considered independently.

Of the 120 warranty claims identified in response to Request 5:

- Atlas 2.0L – 4 claims
- Atlas / Atlas Cross Sport 3.6L – 116 claims

Please refer to further analysis in response 12 d.

Response 5 cont'd.

Information for these claims is provided in Microsoft Excel format, entitled "WARRANTY DATA.xlsx", in the folder attached hereto as Exhibit to Request 5. The claims are organized by file number, in ascending order.

Source: Business Objects Warranty Universe

Date Gathered: Through the date of the inquiry (April 01, 2021)

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. State whether the diagnostic trouble codes are automatically reported to the warranty database electronically or manually entered into 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 (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 the Warranty Claims data to identify claims in response to Request 5:

- Identify 2018-2020 Model Year (MY) Atlas and 2020 MY Atlas Cross Sport vehicles manufactured and sold to Volkswagen Group of America, Inc. for resale or lease in the United States.

- Identify the fuel injector service part numbers applicable to the subject vehicles:
    - 2.0L - 06A906036%
    - 3.6L - 03H906036%

The individual records were manually screened to identify those which contained customer concerns which relate to, or may relate to, the alleged defect, a malfunction of the fuel injector that leads to a fuel leak in the engine compartment.

The diagnostic system does not include any diagnostic trouble codes (DTCs) designed exclusively to register a fuel leak due to a fuel injector failure, nor to register issues relating to an engine compartment fuel leak in general.

Diagnostic trouble codes are neither automatically nor manually entered into the warranty database. Diagnostic trouble codes, for each vehicle, are retrieved on a case by case basis. There is no existing link between the warranty database and diagnostic trouble codes.

New Vehicle Limited Warranty Coverage:

Make	Model Year	Model	New Vehicle Limited Warranty	Extended Warranty
Volkswagen	2018-2019	Atlas	6 Years / 72,000 Miles	N/A
Volkswagen	2020	Atlas	4 Years / 50,000 Miles	N/A
Volkswagen	2020	Atlas Cross Sport	4 Years / 50,000 Miles	N/A

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

Volkswagen has not identified any documents that relate to, or may relate to, the alleged defect in the subject vehicles, that VW has issued to any dealers, regional or zone offices, field offices, fleet purchasers, or other entities. Further, Volkswagen does not have any planned communications within the next 120 days.

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 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

Response 8 due as a supplemental response on or before July 09, 2021

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. For each such modification or change, provide the following information:

a. The date or approximate date on which the modification or change was incorporated into vehicle production;
b. A detailed description of the modification or change;
c. The reason(s) for the modification or change;
d. The part number(s) (service and engineering) of the original component;
e. The part number(s) (service and engineering) of the modified component;
f. Whether the original unmodified component was withdrawn from production and/or sale, and if so, when;
g. When the modified component was made available as a service component; and
h. 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

Response to items “a.” through “h.” is provided under request for confidential treatment. A redacted copy is provided in an Adobe Acrobat file, entitled “RESPONSE NUMBER NINE_PUBLIC.pdf”, in the folder attached hereto as Exhibit to Request 9.

10. Produce two of each of the following:

a. Exemplar samples of each design version of the subject component;
b. Field return samples of the subject component exhibiting the subject failure mode;
c. Any kits that have been released, or developed, by VW for use in service repairs to the subject component/assembly which relate, or may relate, to the alleged defect in the subject vehicles; and
d. Send these samples to NHTSA's Vehicle Research and Test Center (VRTC).

Response 10

In response to this inquiry, Volkswagen has acquired exemplar samples of new fuel injectors and one failed fuel injector. The following components will be sent to NHTSA's Vehicle Research and Test Center (VRTC), as requested:

3.6L: Exemplar parts (new)

- Yes - 03H906036E (superseded to 03H906036Q)
- No - 03H906036F ('F' is no longer available, 0 inventory, superseded to 03H906036R)
- Yes - 03H906036R
- Yes - 03H906036Q

2.0L: Exemplar parts (new)

- Yes - 06A906036G
- No - 06A906036K (currently 0 inventory; on backorder)

3.6L: Failed part

- Yes - 03H.906.036.F

Volkswagen is monitoring warranty repairs to acquire the additional requested component and will provide it to NHTSA's Vehicle Research and Test Center (VRTC), as requested.

Volkswagen has not released and/or developed any kits for use in service repairs to the subject component/assembly which relate, or may relate, to the alleged defect in the subject vehicles.

11. State the number of each of the following that VW has sold that may be used in the subject 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 cutoff date for sales, if applicable):

a. Subject component;
b. Similar or substantially similar components; and
c. 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 component for item "a." in an Adobe Acrobat file, entitled "PART SALES DATA.pdf" in the folder attached hereto as Exhibit to Request No. 11.

Volkswagen notes that there are no similar or substantially similar components [fuel injectors] available for the subject vehicles, beyond the specific service part numbers provided. A table that identifies the model and model year of vehicles that contain the identical component, whether installed in production or in service, and state the applicable dates of production or service usage, is provided in an Adobe Acrobat file, entitled, "PART APPLICATIONS DATA.pdf", in the folder attached hereto as Exhibit to Request 11.

Further, Volkswagen has not released and/or developed any kits for use in service repairs to the subject component/assembly, per item "c".

Additionally, in response to this inquiry, Volkswagen is providing supplier identification and point of contact information in an Adobe Acrobat file format, "SUPPLIER DATA.pdf", in the folder attached hereto as Exhibit to Request 11.

Source: Volkswagen Group of America, Inc. Date Gathered: Through the date of the inquiry (April 01, 2021)

12. Furnish VW's assessment of the alleged defect in the subject vehicle, including:

a. The causal or contributory factor(s);
b. The failure mechanism(s);
c. The failure mode(s);
d. The risk to motor vehicle safety that it poses;
e. What warnings, if any, the operator and the other persons both inside and outside the vehicle would have that the alleged defect was occurring or subject component was malfunctioning; and
f. The reports included with this inquiry.

Response 12

The 2018-2020 MY Atlas and 2020 MY Atlas Cross Sport are available in the U.S. market with two different engines: the 2.0L engine (235hp) built in Silao, Mexico, with the engine design EA888, and the 3.6L engine (276hp) built in Salzgitter, Germany, with the engine design EA390.

Due to the different engine displacements, the fuel injectors are different in design, have unique part numbers, and are manufactured by two different suppliers. Additionally, the assembly of the engines is located in two different factories, which may influence field performance.

Therefore, the underlying cause of a possible fuel injector failure, as well as the rate of replacement, must be considered independently. The response to each request is consequently divided into two parts for each engine for the corresponding explanations, where applicable.

12 a. The causal or contributory factor(s);

2.0L:
For the 2.0L Atlas, only four claims have been identified in the warranty data. In three of the four warranty claims, the customer complaint was for misfire only. The last complaint involved a fuel smell allegation. However, the dealer did not identify any potential cause of the odor in the dealer claim comments. Additionally, no field return parts for the Atlas have been sent to the engine plant in Silao for analysis. Therefore, causal or contributory factor(s) cannot be identified for the 2.0L Atlas as it relates to the alleged defect.

3.6L:
The 3.6L engine is a "VR6" type engine. Due to its specific design, the VR6 has installed two types of injectors with different designs. As depicted below, cylinders 1, 3, and 5 use "long-injectors" and cylinders 2, 4, and 6 use "short-injectors".

Unlike the "short injectors," the "long-injectors" require an "extension pipe" necessary to reach the cylinders 1, 3, and 5 (see Figure 1).

Response 12 cont'd.

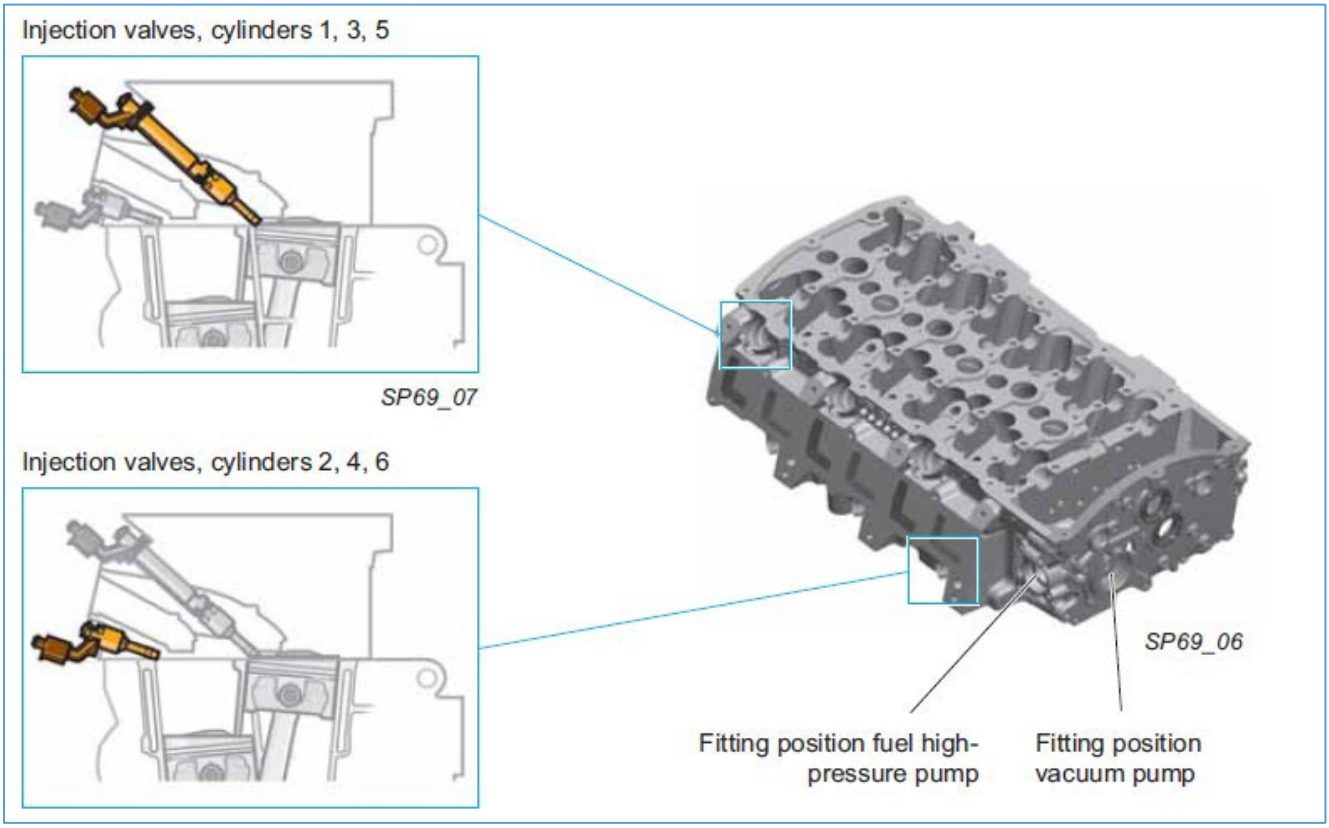


Figure 1: Overview VR6 engine

With the beginning of the production of the 2018 MY Atlas 3.6L, some leaking injectors had been identified. While the vast majority of the leaking claims addressed "internal" leaking (leaking into cylinder), few claims were found for external leaks. Intensive analysis showed that two main potential causes could result in an external leaking.

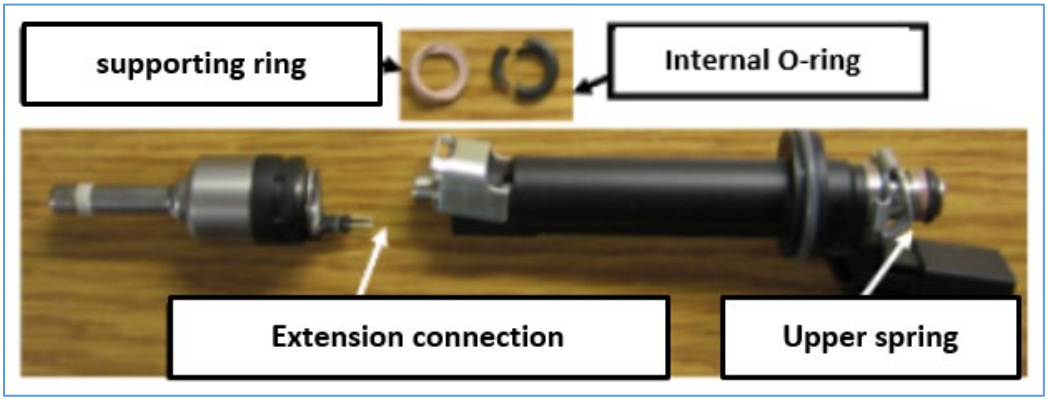


Figure 2: overview long injector with extension and damaged O-ring

a) damaged / mis-aligned / missing supporting ring

b) pre-damaged O-ring

c) other single causes

Response 12 cont'd.

12b, c. The failure mechanism(s) and failure mode(s):

2.0L:

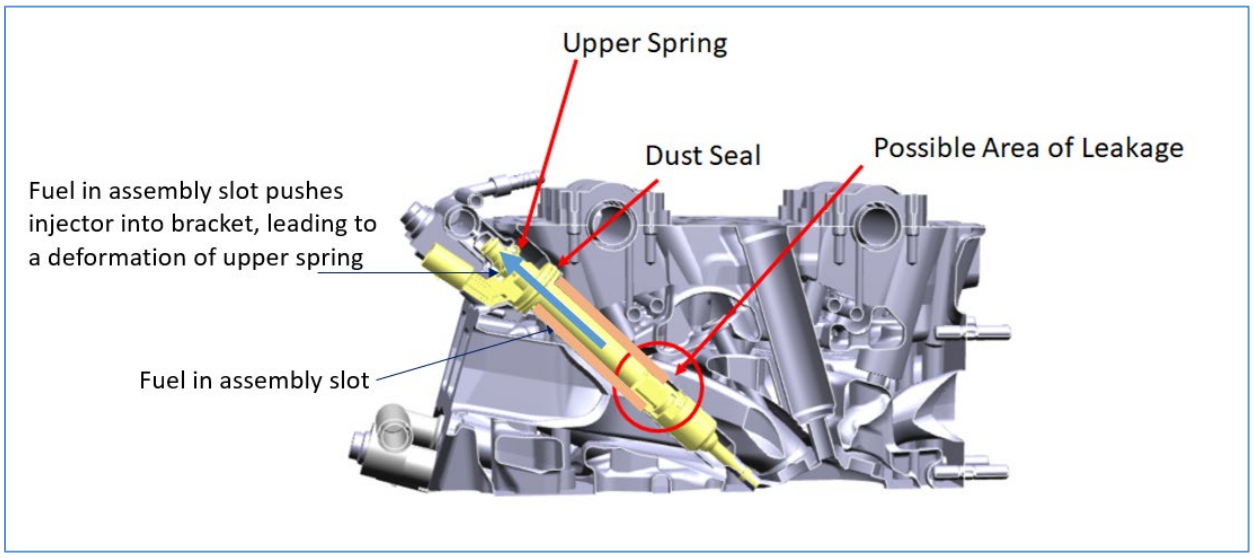
N/A, See Response 12a.

3.6L:

a) Damaged / Mis-Aligned / Missing Supporting Ring

The supporting ring assists the O-ring in withstanding sustained, high fuel pressure and/or other forces. The task of the O-ring is to internally seal the injector. The supporting ring should be positioned next to the O-ring on the fuel injector. If the supporting ring is missing, misaligned, or damaged, the O-ring may lack proper support, which leads to the O-ring shifting into the gap between the main injector and the extension pipe. In this scenario, because the O-ring is unable to seal the injector properly, fuel may enter the outside side of the injector.

Additionally, due to the fuel pressure built up inside the assembly slot of the injector of the cylinder head, the injector is slightly pressed into the bracket and the upper spring may get damaged/compressed. This may lead to fuel entering into the engine compartment.



b) A pre-damaged O-ring

If the O-ring is pre-damaged or twisted during assembly, the failure mode is the same as stated under a). Not all twisted or pre-damaged O-rings will eventually lead to a fuel leak.

c) Other single causes

Over time, various production quality errors may have led to a leaking injector, such as a missing fuel filter element in the injector, transport end cap still on injector after assembly, or missing O-ring. These rare occurrences have only been identified in a few, often single cases for each of the mentioned potential causes.

Response 12 cont'd.

12 d. The risk to motor vehicle safety that it poses;

Volkswagen is not aware of any fire incidents related to 2018-2020 MY Atlas or 2020 MY Atlas Cross Sport vehicles caused by a leaking fuel injector.

2.0L:
Only four cases were identified in the warranty data - three of which were described as "misfires" — without a confirmed cause for potential leaking allegations. Due to the low number of potential cases, Volkswagen believes that the leaking injector allegations for the 2.0L Atlas pose no unreasonable risk to motor vehicle safety.

3.6L:
An analysis of warranty data that could relate to leaking injectors at Atlas 3.6L vehicles showed that the vast majority of leaking allegations were related to "internal" leaks. Fuel could leak into the cylinder causing misfiring in the affected cylinders. This condition would not cause fuel to enter into the engine compartment. Volkswagen believes that these "internal" leaks pose no unreasonable risk to motor vehicle safety.

Volkswagen identified 116 potential "external" leaking claims. The majority of the claims occurred within the first 12 month in service (MIS). The potential root cause for an external leaking injector is most likely either a damaged / mis-aligned / missing supporting ring or a damaged O-ring. If one of these conditions is present in a vehicle, the O-ring has difficulty withstanding fuel pressure over time. Vehicles with these conditions fail early in their life-cycle, which is supported by the warranty data. The Weibull forecast graph indicates no sign of an "aging" or "accelerating" behavior over time. Thus, Volkswagen believes that if a fuel injector were to have the conditions enumerated above, most of those fuel injectors would have already experienced the fuel leaking issues presented in the claims. Volkswagen provided a copy of a Weibull analysis during the March 16, 2021 quarterly meeting based on the TREAD data (thru Q32020).

No known fire cases are associated with the 2018-2020 MY Atlas or 2020 MY Atlas Cross Sport caused by an external leaking fuel injector. In 2018, when Volkswagen began analyzing the first claims for fuel smell and leaking allegations, a risk evaluation was performed in order to identify a potential fire risk. Volkswagen took temperature measurements from the engine compartment of the Atlas 3.6L and made the following assessment:

- While driving, combustible air and/or gas mixtures are unlikely to be present in the engine compartment
- After a stop or restart, combustible air and/or gas mixture may enter the engine compartment, but there is no hot surface nearby the origin of the potential leaking that has the necessary ignition temperature to create a fire

Based on this analysis, and the fact that no known fire cases are associated with the external leaking fuel injector, Volkswagen has not identified an unreasonable risk for a vehicle fire for Atlas 3.6L.

Response 12 d cont'd.

Taking all above mentioned factors into consideration (amount of potential claims, claim prognosis, and risk assessment), Volkswagen identified no unreasonable risk for motor vehicle safety in the subject vehicles for these leaking allegations.

12 e. What warnings, if any, the operator and the other persons both inside and outside the vehicle would have that the alleged defect was occurring or subject component was malfunctioning?

If an external fuel leak is present in the engine compartment caused by a fuel injector, customers could be alerted by fuel smell coming from the engine compartment. Also, in a few events, customers have indicated fuel was observed underneath the vehicle that was alleged to have originated from the engine compartment.

12 f. The reports included with this inquiry:

Volkswagen has reviewed the three ODI records and eleven field reports provided with this inquiry.

It is acknowledged that the concerns stated in ODI records 11218819 and 11382958 were related to the alleged defect of the subject component at issue in this inquiry. Both vehicles were repaired under warranty (claim ID's [redacted] respectively) and the records are provided herein.

A review of ODI record 11218780 determined the concern was related to the fuel system, however, the cause was not the subject component at issue in this inquiry. The vehicle was repaired under warranty.

Volkswagen's notes that an overview of the general assessment of the eleven TREAD field reports was provided during the March 16, 2021 quarterly review and a copy of the file entitled, "FIELD REPORT ASSESSMENT.pdf", is provided in the folder attached hereto as Exhibit to Request 12.

13. Provide the pressure (in PSI) for both the high and low pressure fuel pumps.

Response 13

Pressures (in PSI) for both high and low pressure fuel pumps, for each engine available in the 2018-2020 MY Atlas and 2020 MY Atlas Cross Sport, is provided below:

2.0L EA888:

High pressure fuel system: maximum pressure 2900 psi (200 bar)

Low pressure fuel system: maximum pressure 100 psi (7 bar)

3.6L EA390:

High pressure fuel system: maximum pressure 1595 psi (109 bar)

Low pressure fuel system: maximum pressure 100 psi (7 bar)