

# VOLKSWAGEN

GROUP OF AMERICA

## CONFIDENTIAL BUSINESS INFORMATION

### VIA SECURE FILE LINK

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March 18, 2024 Date

### Re: Response to RQ23-007 Information Request

Dear Ms. Yukevich,

Please find below Volkswagen Group of America's (Volkswagen) Response to your January 02, 2024, Information Request regarding NHTSA's Recall Query (RQ23-007) into the remedy effectiveness of Recall No. 16V-647 involving certain model year 2015 - 2020 Volkswagen Golf (including the Golf GTI and GTI) and Audi A3 (including the S3 and RS3).

1. **State, by model and model year, the number of subject and peer vehicles VW has manufactured for sale or lease in the United States. Separately, for each subject and peer vehicle manufactured to date by VW, state the following:**
  - a. **Vehicle identification number (17-character VIN);**
  - b. **Make;**
  - c. **Model;**
  - d. **Model Year;**
  - e. **Subject component part number installed as original equipment;**
  - f. **Subject component design version installed as original equipment;**
  - g. **Date of manufacture (MM/DD/YYYY);**
  - h. **Date warranty coverage commenced (MM/DD/YYYY);**
  - i. **The State in the United States where the vehicle was originally sold or leased, or delivered for sale or lease (postal abbreviation);**
  - j. **Whether the vehicle was included in the subject recall;**
  - k. **The subject recall repair date;**
  - l. **Whether the vehicle is covered by warranty extension AWA-22-12 or VWP-22-12;**
  - m. **Whether the vehicle has timed out of warranty extension AWA-22-12 or VWP-22-12;**
  - n. **Whether the repair covered by the warranty extensions was performed and, if so, the repair date.**

**Provide the table in Microsoft Access 2010, or a compatible format, entitled "PRODUCTION DATA."**

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### Volkswagen's Response:

Population data is provided for certain model year 2015 - 2020 Volkswagen Golf (including the Golf GTI and GTI) and Audi A3 (including the S3 and RS3) as identified in the RQ23-007 inquiry.

### Subject Population:

Make	Model	2015	2016	2017	2018	2019	2020
Audi	A3 Cabriolet	4,550	2,951	1,350	2,012	920	
Audi	A3 Sedan	35,399	28,104	15,123	14,951	7,524	9,706
Audi	RS 3			245	1,875	1,431	608
Audi	S3 Sedan	3,983	4,106	2,661	2,102	813	970
Volkswagen	Golf (A7)	15,317	13,092	18,137			
Volkswagen	Golf GP				6,270	5,955	3,829
Volkswagen	Golf R	1,770	5,278	4,300			
Volkswagen	Golf R GP				3,542	5,348	
Volkswagen	Golf Sportwagen	2,908	10,598	34,374			
Volkswagen	Golf SportWagen GP				10,515	15,979	
Volkswagen	GTI (A7)	27,809	24,613	32,618			
Volkswagen	GTI GP				14,932	14,253	7,251

### Peer Population:

Make	Model	2019	2020
Volkswagen	Jetta GLI	10,894	4,900

The requested data is provided in the following Microsoft Excel tables entitled:

- Subject vehicles: PRODUCTION DATA Subject.xlsx
- Peer vehicles: PRODUCTION DATA Peer.xlsx

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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 and 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. Reports involving a fire;
  - e. Property damage claims;
  - f. Third-party arbitration proceedings, both pending and closed, where Volkswagen is or was a party to the arbitration; and
  - g. Lawsuits, both pending and closed, in which Volkswagen is or was a defendant or codefendant.

For subparts "a" through "g," 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 "g," provide a summary description of the alleged problem and causal and contributing factors and Volkswagen's assessment of the problem, with a summary of the significant underlying facts and evidence. For items "f" and "g," 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.

### Volkswagen's Response:

Volkswagen notes that the following responses to items "a" through "f" 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 218 consumer complaints which relate to, or may relate to, the alleged defect in the subject vehicles and 1 consumer complaint in the peer vehicles;
- b. In response to this inquiry, Volkswagen has identified 25 field reports which relate to, or may relate to, the alleged defect in the subject vehicles and no field reports in the peer 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 or peer vehicles;
- d. In response to this inquiry, Volkswagen has not received any reports of a fire that was caused by, or alleged to have been caused by, the alleged defect in the subject or peer vehicles;
- e. In response to this inquiry, Volkswagen has not identified any property damage claims;
- f. In response to this inquiry, Volkswagen has not identified any third-party arbitration proceedings where VW is or was a party to the arbitration;
- g. In response to this inquiry, Volkswagen has not identified any lawsuit, in which VW is or was a defendant or codefendant.

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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. Volkswagen'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), email address and telephone number (please use distinct fields for each data type);
  - d. Vehicle owner or fleet street address, city, state (postal abbreviation), and ZIP code (please use distinct fields for each data type);
  - e. Vehicle's 17-character VIN;
  - f. Vehicle's make, model and model year (please use distinct fields for each data type);
  - g. Vehicle's mileage at time of incident (numeric data type);
  - h. Incident date (MM/DD/YYYY);
  - i. Report or claim date (MM/DD/YYYY);
  - j. Whether a crash is alleged;
  - k. Whether a fire is alleged;
  - l. Whether property damage is alleged;
  - m. Number of alleged injuries, if any; and
  - n. Number of alleged fatalities, if any.

Provide this information in Microsoft Access 2010, or a compatible format, entitled "REQUEST NUMBER TWO DATA."

### Volkswagen's Response:

Volkswagen is providing the requested data in the following Microsoft Excel files entitled:

- Subject vehicles: REQUEST NUMBER TWO DATA Subject.xlsx
- Peer vehicles: REQUEST NUMBER TWO DATA Peer.xlsx

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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.

### Volkswagen's Response:

Volkswagen is providing the requested data in the following Adobe Acrobat files:

- Subject vehicles: REQUEST NUMBER TWO documents Subject.pdf
- Peer vehicles: REQUEST NUMBER TWO documents Peer.pdf

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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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 and 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, warranty extension, or customer satisfaction campaign.

Separately, for each such claim, state the following information:

- a. Volkswagen's claim number;
- b. Vehicle owner or fleet name (and fleet contact person), email address and telephone number (please use distinct fields for each data type);
- c. Vehicle owner or fleet street address, city, state (postal abbreviation), and ZIP code (please use distinct fields for each data type);
- d. 17-character VIN;
- e. Repair date (MM/DD/YYYY);
- f. Vehicle mileage at time of repair (numeric data type);
- g. Repairing dealer's or facility's name, telephone number, city and state or ZIP code (please use distinct fields for each data type);
- h. Labor operation number(s);
- i. Problem code(s);
- j. Diagnostic trouble code(s);
- k. Replacement part number(s) and description(s);
- l. Replacement part design version(s);
- m. Concern stated by customer;
- n. Cause as stated on the repair order;
- o. Correction as stated on the repair order;
- p. Additional comments, if any, by dealer/technician relating to claim and/or repair; and
- q. How the claim was paid (including, but not limited to, the subject recall, warranty extensions AWA-22-12 and VWP-22-12, and customer pay).

Provide this information in Microsoft Access 2010, or a compatible format, entitled "WARRANTY DATA."

### Volkswagen's Response:

In response to this inquiry, Volkswagen has identified 1,448 warranty claims and 469 warranty extension claims that relate to, or may relate to, the alleged defect in the subject vehicles as well as 20 warranty claims that relate to, or may relate to, the alleged defect in the peer vehicles.

The requested data is provided in the following Microsoft Excel files entitled:

- Subject vehicles: WARRANTY DATA Subject.xlsx
- Peer vehicles: WARRANTY DATA Peer.xlsx

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6. Describe in detail the search methods and search criteria used by Volkswagen 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.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]



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### Extended warranty coverages related to alleged defect:

- **Fuel Tank Suction Jet Pump Limited Warranty Extension**
  - 2015 - 2020 A3 (FWD)
  - Total vehicle count: 51,670
  - 15 years/150,000 miles, whichever occurs first
  
- **Fuel Tank Suction Jet Pump Limited Warranty Extension**
  - 2015 - 2020 Golf (FWD)
  - Total vehicle count: 60,005
  - 15 years or 150,000 miles, whichever occurs first
  
- **Fuel Tank Suction Jet Pump Limited Warranty Extension**
  - 2015 - 2019 Golf SportWagen (FWD)\*
  - Total vehicle count: 74,374
  - 15 years or 150,000 miles, whichever occurs first

\*Note that some AWD Golf SportWagen vehicles were inadvertently included.

- **Fuel Tank Suction Jet Pump Limited Warranty Extension**
  - 2019 - 2020 Jetta GLI (FWD)
  - Total vehicle count: 15,794
  - 15 years or 150,000 miles, whichever occurs first

### Extended warranty coverages not related to alleged defect:

- **Water Pump Limited Warranty Extension**
  - 2014 - 2021 Golf R, GTI
  - Total vehicle count: 20,238
  - 8 years/80,000 miles, whichever occurs first
  
- **Auxiliary Hydraulic Pump Limited Warranty Extension**
  - 2018 Golf R
  - Total vehicle count: 310
  - 10 years/120,000 miles, whichever occurs first
  
- **Sunroof Limited Warranty Extension**
  - 2015 - 2018 Golf GTI
  - Total vehicle count: 54,283
  - Pro-rated basis for 7 years/80,000 miles, whichever occurs first

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- **Gear Shift Micro Switch Limited Warranty Extension**
    - 2015 - 2019 A3
    - Total vehicle count: 37,015
    - 6 years/60,000 miles, whichever occurs first
  
  - **A3 Mechatronic Limited Warranty Extension**
    - 2017 - 2018 A3 and A3 Cabrio 2.0 TFSI
    - Total vehicle count: 15,448
    - 15 years/150,000 miles, whichever occurs first
  
  - **Hydraulic Unit Limited Warranty Extension**
    - 2017 - 2018 A3, S3 and A3 Cabrio
    - Total vehicle count: 9,184
    - Select vehicles with DQ-381 gearbox 10 years/120,000 miles, whichever occurs first
9. **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.**

### Volkswagen's Response:

The requested documents are provided in a compressed folder entitled:

- VWGoA\_Q9 Documents.zip

Additional documents related to the current recall (24V-110) will be provided to the agency at the appropriate times.

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**10. 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 and 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.**

### Volkswagen’s Response:

Through email on February 21, 2024, NHTSA granted Volkswagen’s request for a four-week extension for producing copies of all documents that are responsive to Question 10. As discussed with NHTSA, Volkswagen is providing a summary table of responsive documents that provides an identifier, the subject information in the native language, the translated subject information in English, the date of the document, and a category. Upon NHTSA’s request, Volkswagen will provide copies of any document listed in the table, noting that we may need a few days to complete translation of documents that are in German. The table of responsive documents is included in the attached file entitled:

- VWGoA\_Q10\_Filelisting\_CONFIDENTIAL.xlsx

Volkswagen is providing a summary of the relevant actions below:



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[REDACTED]

[REDACTED]

[REDACTED]

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**11. 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 and assemblages that may contain the subject component (such as fuel tanks), from the start of production to date, which relate to, or may relate to, the alleged defect in the subject and peer 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.**

### Volkswagen's Response:

Volkswagen is providing the response to questions "11a" through "11e" in the attached spreadsheet entitled:

- VWGoA\_Q11a through 11e\_response\_CONFIDENTIAL.xlsx



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- 12. State the number of each of the following that VW has sold that may be used in the subject and 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:**
- Subject component;**
  - Similar or substantially similar components;**
  - Assemblages that contain the subject component (such as fuel tanks); and**
  - 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.**

### Volkswagen's Response:

The requested documents are provided in a table entitled:

- VWGoA\_Q12a through 12c\_response\_CONFIDENTIAL.xlsx

For question "12d", Volkswagen has not released any service repair kits for the subject component/assembly.

- 13. Describe how the fuel and evaporative emissions systems connected to the subject component operate, and include:**
- Any diagram(s) or schematic(s) necessary; and**
  - Part numbers of relevant components.**

### Volkswagen's Response:

In response to 13a, Volkswagen is providing the necessary diagram in attached document titled:

- VWGoA\_Q13a response\_CONFIDENTIAL.pdf

A detailed description of the venting system is described in response to Question 15 c).



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14. Provide VW's assessment of the effectiveness of warranty extensions AWA-22-12 and VWP-22-12, including:

- a. Number of claims paid under the warranty extensions for subject and peer vehicles. Separate these counts by model, model year, and subject component design version;
- b. Number of claims paid under the warranty extensions for subject vehicles previously repaired under the subject recall. Separate these counts by model, model year, and subject component design version; and
- c. Number of repeat failures in subject and peer vehicles after a repair under a warranty extension was performed. Separate these counts by model, model year, and subject component design version.

Volkswagen's Response:

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]















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[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Sincerely,

[REDACTED]

Chris Sandvig  
Director  
Group Customer Protection  
Volkswagen Group of America