

Volkswagen of America, Inc.



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3800 Hamlin Road
Auburn Hills, MI 48326
Tel. (248) 754-5000

August 19, 2002

OFFICE OF
DEFECTS INVESTIGATION

Mr. Kenneth N. Weinstein
National Highway Traffic Safety Administration
U.S. Department of Transportation
400 Seventh Street, S.W.
Washington, DC 20590

02V-244 ① of ⑤

**Subject: Report of Noncompliance Pursuant to 49 CFR Part 573
2000/2001 Model Year Volkswagen Vehicles
Child Seat Safety Latch**

Dear Mr. Weinstein:

This information is submitted in accordance with the requirements of Part 573 of Title 49 of the Code of Federal Regulations and concerns noncompliance of certain motor vehicles with Federal Motor Vehicle Safety Standard No. 225:

573.5 (c) (1) **Manufacturer's Name**
Volkswagen de Mexico, S.A. de C.V. and
Volkswagen do Brazil

Importer
Volkswagen of America, Inc. (VWoA)

573.5 (c) (2) **Identification of Vehicles**
Make : Volkswagen
Line : Golf, Jetta, Cabrio, and New Beetle
Model Year : 2000 and early production 2001
Month/Year
of Manufacture: September 1, 1999 through January 28, 2001 for the Golf and
January 4, 2001 for the Cabrio, Jetta and New Beetle.

VIN Ranges : Golf
3VW___1J_YM000001 - 3VW___1J_1_011367
Jetta
3VW___9M_YM000001 - 3VW___9M_1M051136
Cabrio
3VW___1V_YM000001 - 3VW___1V_1M803949
New Beetle
3VW___1C_YM000001 - 3VW___1C_1M423033

Other Identification : None

573.5 (c) (3) **Number of Vehicles Affected**

A total of 332,950 vehicles.

573.5 (c) (4) **Percentage of Vehicles Not Complying with FMVSS225**

All affected vehicles.

573.5 (c) (5) **Description of Noncompliance**

The noncompliance relates to S15.4 and S12 of FMVSS 225. S15.4 requires manufacturers of motor vehicles equipped with child restraint anchorage system pursuant to FMVSS 225 to mark those anchorages so that their location between the seat and seatback cushion is identified to potential users. The anchorages in affected vehicles have not been so marked. S12 requires a manufacturer to provide with the vehicle written instructions in the Owner's Manual for using the child seat anchorages. While such instructions were provided to affected owners, they have since been determined to be deficient and have been supplemented.

573.5 (c) (6) **Basis for Determination**

The noncompliance, to the extent it relates to S15.4, concerns optional marking requirements added to FMVSS 225 on August 31, 1999. S15.4 permits manufacturers to comply with marking requirements by means of guidance fixtures as specified in ISO Standard 13216-1, except that the NHTSA did not incorporate certain aspects of the then current ISO Standard (1999 version) because it reportedly suggested that vehicles were not required to be delivered to first retail purchasers with the guidance fixtures already installed. Believing that the NHTSA's omission was inadvertent, VWoA joined the Alliance in its petition to correct the error. The Agency clarified its position on July 31, 2000 in its response to the Alliance petition, advising that the Agency sought to incorporate the 1998 version of the ISO Standard rather than the 1999 version because the 1999 version "would have suggest[ed] that manufacturers could satisfy marking requirements if they provided guidance fixtures without actually installing them." VWoA immediately took action to comply with the Agency's decision but expressed concern that it may not be able to do so in a timely fashion. On August 17, 2000 VWoA filed a petition seeking to defer the effectiveness of S 15.4 by 30 days to October 1, 2000 at which time VWoA would definitively be able to comply. VW's petition was denied by notice published in the Federal Register of June 13, 2001. VWoA has installed guidance fixtures in these vehicles in accordance with S15.4 since August 30, 2000. The factory installation of guidance fixtures was replaced with seat marking beginning January 5, 2001 for the Cabrio, Jetta and New Beetle and January 29, 2001 for the Golf.

The noncompliance, to the extent it relates to S12, concerns deficiencies discovered in the written instructions, which are currently contained in the Owner's Manual. Owners who took delivery of vehicles manufactured on or after June 7, 2000, have received complete written instructions conforming to S12 and are in full compliance with the law.

573.5 (c) (7) **Noncompliance Test Result**
Not applicable

573.5 (c) (8) **Proposed Remedial Program**

VWoA plans to notify all owners who have taken delivery of a Jetta, Cabrio or New Beetle vehicle manufactured with child restraint anchorages since September 1, 1999, when FMVSS 225 became effective up to the production date in January 2001 when seat marking was initiated. VWoA will provide to owners the following remedies:

- It will send to owner's two sets of guidance fixtures (a total of 4) for owner installation in the two rear seats or for dealer installation in the event the owner prefers assistance from the dealer.
- It will send to owners four self-adhesive pressure sensitive appliquéés (a total of two per seating position) which the owner may affix himself or herself to the seatback above the anchorages or ask any authorized Volkswagen dealer to do so. The appliquéés will be accompanied by detailed instructions for the permanent application to the seat surface.
- It will send a Supplement to the Owner's Manual entitled "Child Restraint Installation in Volkswagen Models Latch System" together with inserts to the Owner's Manual containing installation instructions for child seat tethers and an explanation of the seat marking.

Mailing dates have tentatively been set as follows:

Dealers: On or about September 05, 2002

Owners: On or about September 15, 2002

573.5 (c) (9) **Submission of Communications**

A representative copy of all bulletins and other communications sent to dealers and owners will be submitted within five (5) days of owner notification.

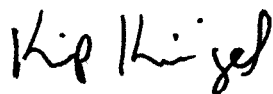
573.5 (c) (10) **Proposed Owner Letter**

A draft of the proposed owner notification letter is attached for review.

573.5 (c) (11) **Manufacturer's Recall Code**

Volkswagen has assigned the code "UW" to this recall.

Sincerely,



Kip Kriigel
Director
Technical Service

Volkswagen of America, Inc.



3800 Hamlin Road
Auburn Hills, MI 48326
Tel. (248) 754-5000

02V-244 ④ of ⑤

September 2002

**Subject: Compliance Recall Campaign - UW
Child Seat Safety Latch**

Dear Volkswagen Owner:

This notice is sent to you in accordance with the requirements of the National Traffic and Motor Vehicle Safety Act.

Volkswagen has decided that some 2000 and 2001 model Volkswagen vehicles fail to fully conform to Federal Motor Vehicle Safety Standard No. 225 – Child Restraint Anchorage Systems. Our records show that you are the owner of one of these vehicles.

Federal Motor Vehicle Safety Standard 225 requires that the child seat anchorages installed in your vehicle's rear seats be identified by markings, and their location and use be described in your Owner's Manual.

Your Volkswagen was factory equipped with child seat anchorages which have not been marked or described in your Owner's manual, as required by federal regulation.

In order to correct this non-compliance, we have enclosed for your use a Supplement to your Owner's Manual entitled "Child Restraint Installation in Volkswagen Models-Latch System" together with two inserts for your Owner's Manual which contains supplemental instructions for child seat tethers strap installation and a description of the seat markings for the lower anchorages.

We have also enclosed one set of four guidance fixtures which are intended for use in conjunction with child seats equipped with rigid or semi-rigid lower anchorage attachments as described in the Owner's Manual Supplement.

Finally, we have enclosed four decals together with installation instructions and a template for attaching the decals to the lower seat backs immediately above each of the four child seat anchorage points. You may install the decals yourself. If you prefer that your dealer install the decals, please telephone the service department of your authorized Volkswagen dealer. A service consultant of your dealer will be happy to help you in affixing the decals free of charge. The service will take just a few minutes.

Service Help From Us

If your authorized Volkswagen dealer fails or is unable to remedy the defect free of charge within a reasonable time, please call or write to:

Volkswagen of America, Inc.
Attn: Customer Relations –2W (UW)
3800 Hamlin Road
Auburn Hills, MI 48326-2855
(800) 822-8987

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If you still cannot obtain satisfaction, you may file a complaint with: Administrator, National Highway Safety Administration, U.S. Department of Transportation, 400 Seventh Street, SW, Washington, DC 20590. Telephone: (888) 327-4236.

We regret any inconvenience this matter may cause, however, we want to make sure that your Volkswagen complies with all federal requirements.

Thank you for driving a Volkswagen.

Sincerely,

John von Hollen
Product Compliance