Volkswagen of America, Inc.



April 2005

Subject: REVISION to Compliance Recall UY

2004-2005 Model Year Volkswagen Touareg Vehicles

Inspect Rear Outboard Seat Belts and, if Necessary, Install Belt Shortening Clips

Dear Volkswagen Dealer Principal and Service Manager:

This letter is to inform you that the UY Compliance Recall circular has been revised. Please discard any previous copies of the circular that you may have and refer to the **REVISED UY** circular that will be posted on VESIS and on the VW Hub shortly.

IMPORTANT!

All claims for repairs performed under the previous version of the UY circular <u>must be entered</u> on or before April 24, 2005. Failure to do so may result in non-payment of your claim.

The UY compliance recall involves some 2004-2005 model year Volkswagen Touareg vehicles. Volkswagen has determined that a non-compliance with Federal Motor Vehicle Safety Standard No. 208 exists in some 2004 and early 2005 model year Touareg vehicles. The affected rear outboard seat belts may not properly secure a limited number of child restraints when using the Automatic Locking Retractor (ALR) mode of the seat belt.

Federal law prohibits any person from knowingly selling, or offering for sale, any motor vehicle that does not comply with applicable motor vehicle safety standards prescribed under Chapter 301 ("Motor Vehicle Safety") of Title 49, United States Code. It is therefore imperative that any vehicle in your inventory that is affected by this recall is corrected prior to delivery for sale or lease.

Touareg vehicles produced either after September 20, 2004 (starting after VIN WVGMM77L35D030830) or with a seat belt date code as described in the UY Compliance Recall circular are not affected and can be sold without delay.

The rear outboard seat belts on affected vehicles MUST BE INSPECTED and, IF NECESSARY, have seat belt clips installed. Please note that, even if only one rear outboard seat belt meets the criteria for clip installation, clips must be installed on both rear outboard seat belts.

We are working diligently to obtain additional stock of clips; however stock will be limited in the beginning.

Please refer to the **REVISED Compliance Recall Circular UY** posted on web VESIS and on the VW HUB for additional information, and please be sure to share this information with all personnel with campaign-related responsibilities.

Thank you for your cooperation and assistance in this important matter.

Sincerely.

Maria Cotter, Product Compliance

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Frequently Asked Questions & Answers for Compliance Recall UY (U.S. Vehicles) and Service Action UY (Canadian Vehicles)

This FAQ is intended to provide supplementary information regarding the UY compliance recall (U.S. vehicles) and the UY Service Action (Canadian vehicles) For additional information, please refer to the circulars that will be posted on web VESIS and on the VWHub.

■ What vehicles are affected?

Some 2004 and some early 2005 model year Volkswagen Touareg vehicles in the U.S.A,; and some 2004 model year Volkswagen Touareg vehicles in Canada. These vehicles need to be inspected and, if necessary, have seat belt shortening clips installed at both rear outboard seat belts replaced.

■ What is the problem?

Volkswagen has found that the rear outboard seat belts in affected vehicles do not comply with FMVSS 208 S7.1.1.5 with regard to the rear seat belt locking feature used when installing some child seats..

■ What exactly is the non-compliance that the campaign is addressing?

This campaign is designed to address the non-compliant automatic locking retractor (ALR) feature of some 2004/2005 Touareg rear outboard seat belts when those belts are used to secure a child restraint.

The vehicles did not comply with an applicable Federal Motor Vehicle Safety Standard with regard to the seat belt locking feature in the outboard rear seating positions. All three rear seat positions and the front passenger position are equipped with seat belt retractors that have a locking feature which converts the retractor from an emergency locking retractor (ELR) mode to an automatic locking retractor (ALR) mode for the purpose of child restraint installation. The belts convert to the ALR mode after the webbing has been drawn fully out of the retractor. As the belt is then released into the retractor, the system remains in the ALR mode so that the belt can be tensioned for securing a child restraint.

However, for the rear outboard seating positions, the ALR mode changes to the ELR mode at a point before all of the webbing of a belt, which the latch plate has been inserted into the buckle, has been fed back into the retractor. As a result, the belt may deactivate the ALR mode with a small number of forward-facing child restraints (which have a short belt routing path). In that case, the child restraints are not securely installed within the meaning of the requirement.

The seat belt in the center rear seating position is fully compliant and is not affected by this action.

In general, we recommend that the LATCH system in the vehicle be used to secure a child seat, if that child seat is LATCH-equipped.

Can the rear outboard belts be used until the vehicle is repaired? What if I need to use a child restraint in my vehicle?

Adults can use the rear seat belts normally.

Most child seats can be properly secured in your vehicle. This includes rear-facing infant seats, most forward-facing child seats, and booster seats. Only a few child seats will use so little belt length to cause the seat belt retractor to switch from ALR to ELR mode prematurely. When using a child seat in your vehicle, be sure to follow the instructions that came with the child seat, and be sure to put the seat belt height adjuster in the top most position.

The center rear seat belt is not affected by this action. Therefore, for the small number of forward facing child seats that cannot be properly secured in a rear outboard seat belt, the center rear seat belt is an option.

If a child seat was built with the LATCH system, the LATCH system in the vehicle can be used to properly secure the child seat. Again, be sure to follow the instructions that came with the child seat.

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■ What exactly does the repair involve?

Both rear outboard seat belts must be inspected. If necessary, have seat belt shortening clips installed on them.

■ How long does the repair take?

The inspection takes just a few minutes as does the clip installation.

■ When will parts be available?

Volkswagen is continuing to work diligently to obtain a continued flow of seat belt shortening clips, however stock will be limited in the beginning.

■ What if, after seat belt shortening clips are installed, an adult customer using a rear outboard seat belt experiences the ALR mode activating when he/she is using the seat belt?

If you receive customer inquiries about this, please contact the Recall Helpline at 1-800-741-2919 for assistance.

■ Why is the UY a Compliance Recall in the U.S.A. and a Service Action in Canada?

For U.S. vehicles, a non-compliance exists with an FMVSS requirement, which is not applicable in Canada. However, because we wish to make this repair solution available to both U.S. and Canadian customers, we are launching a compliance recall in the U.S. and a service action in Canada.