Volkswagen of America, Inc.



May 11, 2005

Subject: Revision to Compliance Recall UY
2004 – 2005 Model Year Volkswagen Touareg Vehicles
Inspect Rear Outboard Seat Belts and, if Necessary, Install Seat Belt Clips

Dear Volkswagen Dealer Principal and Service Manager:

This letter is to inform you of some updates made to the UY Compliance Recall circular, based on questions from dealers who have contacted us.

- <u>In all cases</u> where both rear outboard seat belts in a vehicle have a date earlier than August 7, 2004, the seat belt clips must be installed.
- In rare cases, a vehicle may have one rear outboard seat belt dated earlier than August 7, 2004 and one dated later. If this happens, one seat belt may be replaced under this action instead of using a seat belt clip.
- For customer satisfaction, we will consider requests to replace both rear outboard seatbelts if, after the seat belt clips are installed, the customer returns because he/she is experiencing the ALR feature activating too soon when an adult is using the rear seat belts, or if the customer expresses other dissatisfaction. This belt replacement will only be considered/authorized for customer satisfaction until May 31, 2006. After this date no requests will be authorized. You must contact the Campaign Helpline at 1-800-741-2919 to obtain an authorization code prior to performing the belt replacements or your claim will be denied. ONLY the Campaign Helpline can provide you with this authorization code.

In all cases where seat belts are replaced, dealers should render inoperative
and properly dispose of the removed belt(s) in accordance with the instructions
found in the May 11, 2005 UY Compliance Recall Circular. Additionally, if belt
replacements are authorized after the seat belt clips are installed, we are asking
that you remove the seat belt clips from the belts prior to disposal and return the
clips to:

Volkswagen of America
Product Compliance/UY Action/Mail Stop 3F03
3800 Hamlin Road
Auburn Hills, MI 48326

 Volkswagen will be auditing all claims to ensure that proper the authorization code has been obtained when both seat belts are replaced under this action. To prevent a claim from being rejected, the authorization code must be documented in the comments field of the claim. All claims without a proper authorization code will be returned to you.

Please refer to the May 2005 **UY Compliance Recall** circular 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 REVISED (May 11, 2005) 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. In rare cases only one seat belt will require replacement. Please refer to the UY circular for more details.

■ 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 and, if necessary, seat belt shortening clips will be installed on them. In rare cases, only one seat belt will require replacement; this is covered in more detail in the UY circular.

■ How long does the repair take?

The inspection takes just a few minutes as does the clip installation. If one seat belt requires replacement, the repair will take about two hours.

■ 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.