

Volkswagen of America, Inc.



Product Compliance
3800 Hamlin Road
Auburn Hills, MI 48326

2005 FEB -2 P 4: 53
DEFECTS INVESTIGATION

January 28, 2005

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

**Subject: Voluntary Compliance Recall UY
2004 – 2005 Model Year Volkswagen Touareg Vehicles
Assigned Recall No. 04V-592**

Dear Mr. Weinstein:

This will amend our Part 573 Report dated December 10, 2004 by providing the following information:

573.6(c)(2)(i) Identification of Vehicles or Equipment

2004 and 2005 Touareg vehicles manufactured from March 26, 2003 to September 20, 2004 (VIN range WVG __ _7L_4D000056 to WVG __ _7L_5D030829).

573.6(c)(8) Proposed Remedial Action

Volkswagen notified dealers on January 6, 2005 of this non-compliance and published the enclosed recall circular. Volkswagen will notify owners on or before March 28, 2005 of the recall and provide an owner's manual insert as discussed with NHTSA OVSC. Dealers will permanently install a "clip" in each of the two rear outboard seat belts. The clips will prevent unwanted deactivation of the ALR mode with child seat installations.

573.6(c)(9) Proposed Remedial Action

Volkswagen will submit copies of draft owner communications no less than five business days before the intended mailing date.

573.6(c)(9) Campaign Number

Volkswagen has assigned the code "UY" to this action.

Sincerely,

A handwritten signature in black ink, appearing to read 'John Maddox', with a long horizontal line extending to the right.

John Maddox
Product Compliance Officer

Enclosures

Volkswagen of America, Inc.



3800 Hamlin Road
Auburn Hills, MI 48326

January 6, 2005

**Subject: Compliance Recall UY
2004-2005 Model Year Volkswagen Touareg Vehicles
Inspect and/or Replace Rear Outboard Seat Belts**

Dear Volkswagen Dealer:

This letter is to inform you of the initiation of a compliance recall involving 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.

The rear outboard seat belts on affected vehicles **MUST BE INSPECTED** and, **IF NECESSARY, REPLACED BEFORE THEY ARE SOLD**. This action is **MANDATORY** under Federal law.

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.

We are working diligently to obtain additional stock of rear outboard seat belts as soon as possible for the affected Touareg vehicles in your new vehicle stock. The remedy for vehicles that are already sold and in customers' hands will be different and will be provided to you at a later date.

Please refer to **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,

A handwritten signature in cursive script that reads "Maria Cotter".

Maria Cotter
Product Compliance

Volkswagen of America, Inc.



3800 Hamlin Road
Auburn Hills, MI 48326

January 24, 2005

**Subject: REVISION to Compliance Recall UY
2004-2005 Model Year Volkswagen Touareg Vehicles
Inspect and/or Replace Rear Outboard Seat Belts**

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.

The circular has been revised so that it no longer states "Destroy and properly dispose of any removed parts." **Please DO NOT destroy or dispose of any removed parts.** Instead, we ask that you properly identify removed part(s) and store in a secure location at your dealership until directed otherwise.

Please refer to the **REVISED Compliance Recall Circular UY** posted on web VESIS 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,

A handwritten signature in black ink, appearing to read "Maria Cotter".

Maria Cotter
Product Compliance

Important! Please Provide A Copy To All Personnel With Campaign-Related Responsibilities!
THIS REPLACES THE UY CIRCULAR DATED JANUARY 2005



Compliance Recall Circular

REVISED Code: UY

January 2005

**Subject: 2004 – 2005 Model Year Volkswagen Touareg Vehicles
Inspect and/or Replace Rear Outboard Seat Belts**

This is to inform you of the initiation of a compliance recall involving some 2004 – 2005 model year Touareg vehicles.

Problem Description

Volkswagen has found that the affected vehicles fail to comply with FMVSS 208 S7.1.1.5 with regard to the rear seat belt locking feature in the rear outboard seating positions. 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.

Remedial Action

Inspect both rear outboard seat belts and, if necessary, install a new seat belt at one or both of the rear outboard seating positions.

**Vehicle Identification
Number Range**

The vehicles affected by this action are within the following vehicle identification number range:

WVG__7L_4D000056 - WVG__7L_5D030829

Please note that the above VINs represent the lowest and highest serial numbers of affected vehicles. Use of the OTIS campaign inquiry system will allow you to determine whether or not a particular vehicle, within the above VIN range, requires the corrective work.



**Limitation of Sale or
Lease of Certain
Vehicles**

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.**

**Owner Notification
Mailing**

As this action currently affects only vehicles in dealer stock, there will be no owner notification.

Parts Information

During the campaign launch period, parts will be blocked and released by VIN through Special Services. Refer to the VWHub for campaign parts updates. After the launch period, the block may be lifted and then parts can be ordered through your facing parts depot.

Additional Campaigns

Some of the affected vehicles may be involved in an additional corrective action. Please check your OTIS View Campaign inquiry screen so that any additional required work can be done simultaneously.

**Time Requirements/
Reimbursement**

To ensure prompt and proper payment, be sure to enter, immediately upon completion of the repair work, the applicable reimbursement code listed below. Claims will only be paid for vehicles that show the **UY** code in the OTIS View Campaign inquiry screen on the day of repair. It is therefore recommended that a screen print of the OTIS View Campaign inquiry screen be attached to the repair order.

UY Data Entry Procedure

| Repair Code <small>(Damage Code Field)</small> | Time Units | Work Scope |
|--|-------------------|--|
| UY 11 | 10 T.U. | - Check both rear outboard seat belts; No further work required |
| UY 12 | 160 T.U. | - Check both rear outboard seat belts; Replace left rear outboard seat belt 1 7L0 857 805A *** Rear seat belt -Left |
| UY 13 | 160 T.U. | - Check both rear outboard seat belts; Replace right rear outboard seat belt 1 7L0 857 806A *** Rear seat belt -Right |
| UY 14 | 220 T.U. | - Inspect both rear outboard seat belts. Replace left & right rear outboard seat belts 1 7L0 857 805A *** Rear seat belt -Left 1 7L0 857 806A *** Rear seat belt -Right |

There is NO reimbursement for Vehicle Wash or Loaner Vehicle.

The system automatically enters labor and parts applicable to the above listed codes.

For vehicles that, according to your information, cannot be corrected or reached, and one of the codes below best describe the reason, please enter one of the applicable codes into the system:

- **UY 20 Customer Refused Repairs**
- **UY 30 Total Loss**
- **UY 40 Vehicle Stolen**
- **UY 50 Vehicle Exported**

Campaign Verification For verification, always check the OTIS View Campaign inquiry screen. The OTIS system is the only binding campaign inquiry and verification source; other sources are not valid and may result in non-payment of a claim.

Service Help If you have a question regarding this or any other campaign, please call (800) 741-2919.

Dealer Personnel Information Please inform and/or provide a copy of this communication to every person in your dealership who has campaign-related responsibilities, including parts and accounting personnel.

Thank you for your cooperation.

Sincerely,



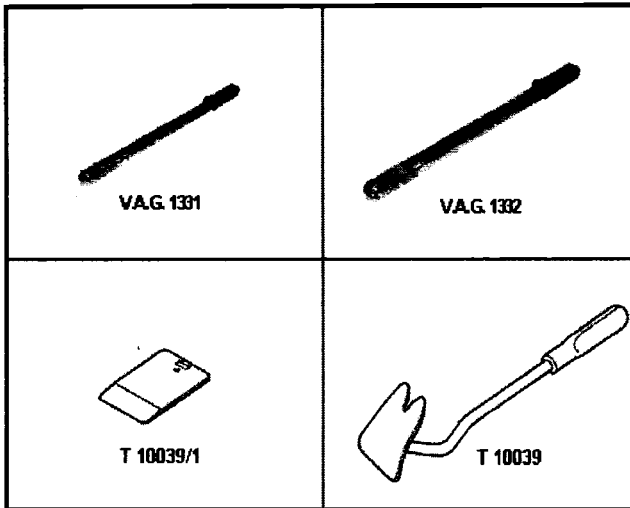
Maria Cotter
Product Compliance

Parts:

| Quantity | Part Number and date | Part Name |
|----------|---|--------------------------------|
| 1 | 7L0 857 805 A *** dated 07.08.2004 or later | Rear Seat Belt Left |
| 1 | 7L0 857 806 A *** dated 07.08.2004 or later | Rear Seat Belt Right |
| | Shop Supplies | Loctite® threadlocker blue 242 |

(*** Color code per ETKA)

Special Tools:



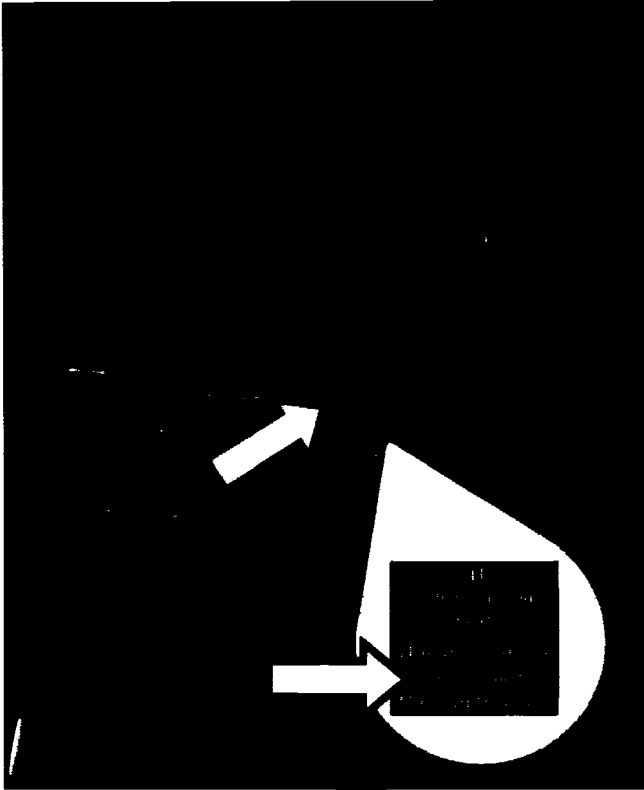
⇐ Torque wrench V.A.G. 1331 or equivalent

⇐ Torque wrench V.A.G. 1332 or equivalent

⇐ Wedge T 10039/1 or equivalent

⇐ Wedge T 10039 or equivalent

Work Sequence:



Section A – Check Rear Seat Belt identification label

- Open both rear doors
- ⇐ Illustration is showing left rear seat belt
- ⇐ Check the date -arrow- on the left and right outer rear seat belt labels;



- If the date is 07.08.2004 (**7 August 2004**) or later, no further work is required
- If the date is earlier then 07.08.2004, the seat belt needs to be changed, proceed to Section B

Section B – Rear Seat belt removal

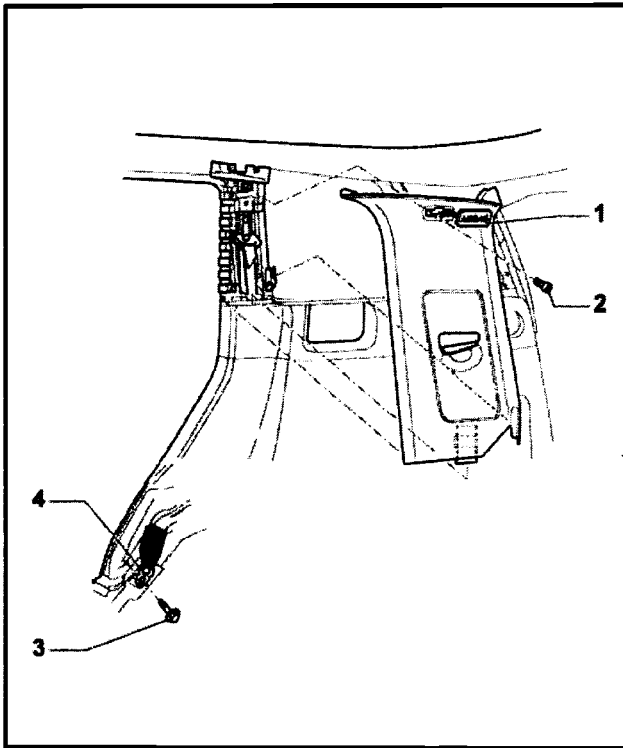


Observe safety precautions for belt tensioners

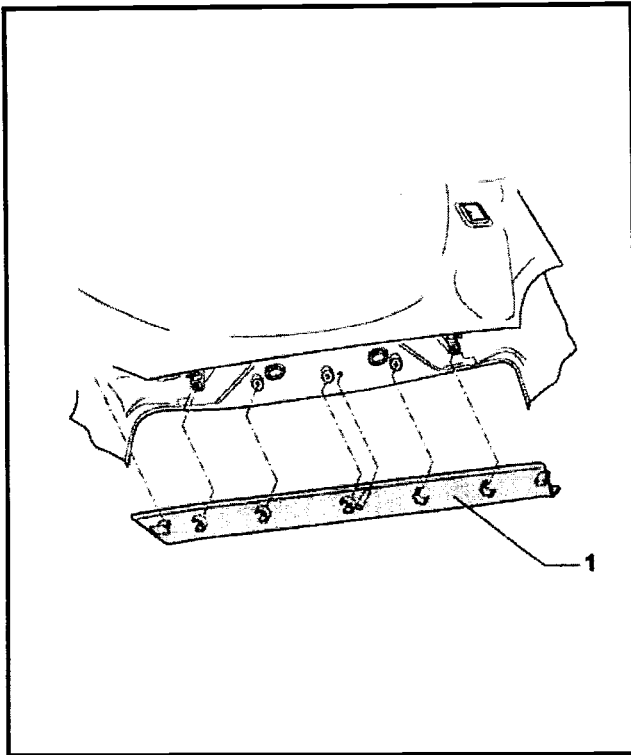
- Disconnect batteries



Prior to handling or servicing batteries, read, understand and observe the Warning and Safety measures for lead-acid batteries

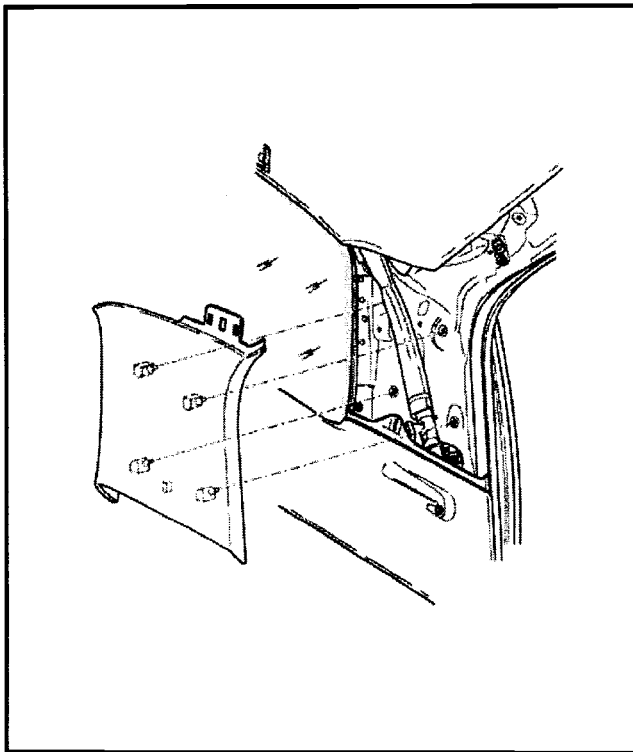


- ⇐ Remove air bag emblem -1- and remove screw -2-
- ⇐ Fold seat cushion forward and remove bolt -3-
- ⇐ Remove belt anchor -4- from body
- Pull C-pillar trim out of mountings in body and door seal molding
- Remove trim and pull seat belt through opening

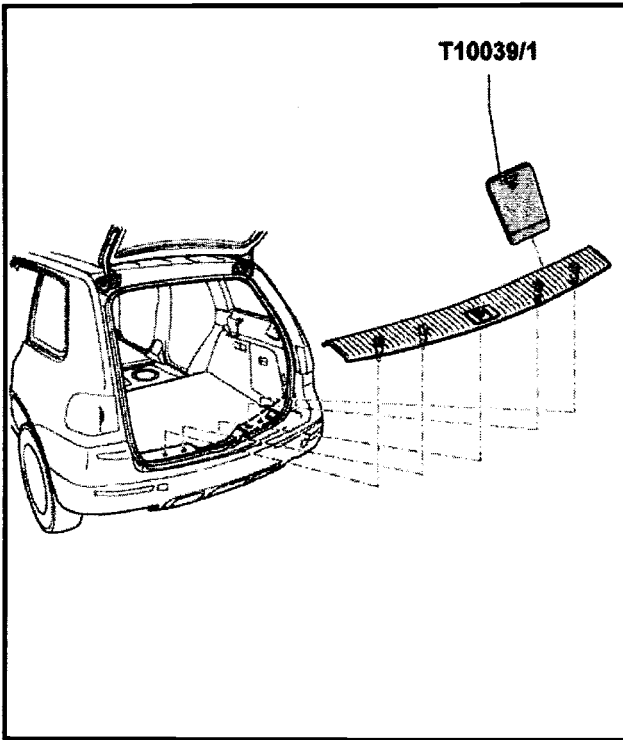


- Open tailgate

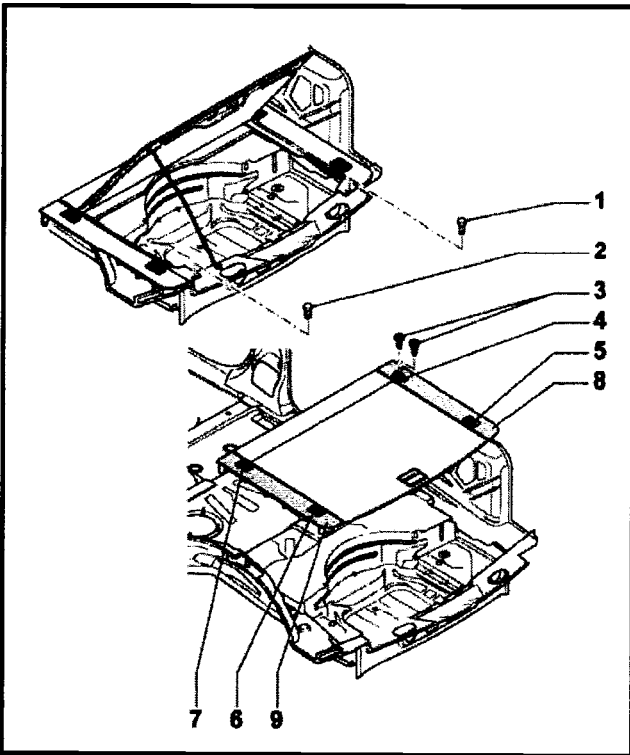
⇐ Pull roof end strip -1- downward out of mounting in roof



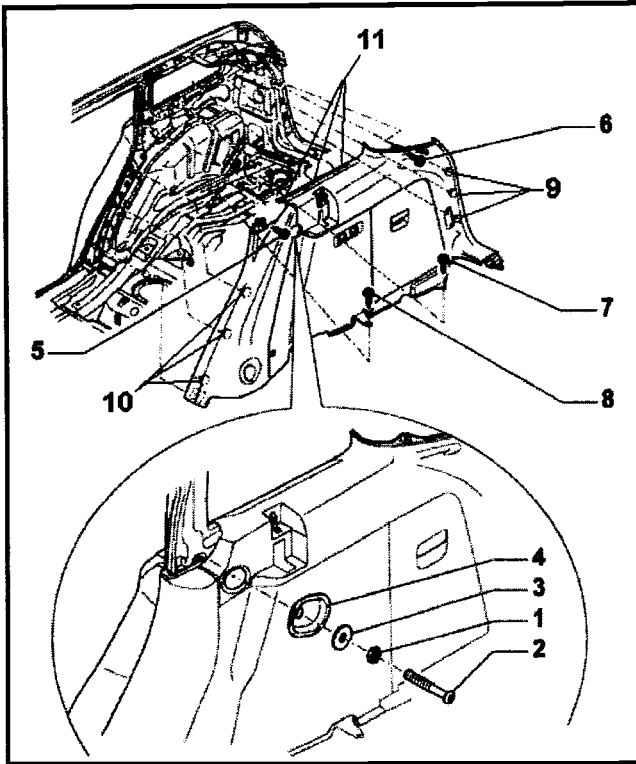
⇐ Pull D-pillar trim out of mountings in body and door seal molding



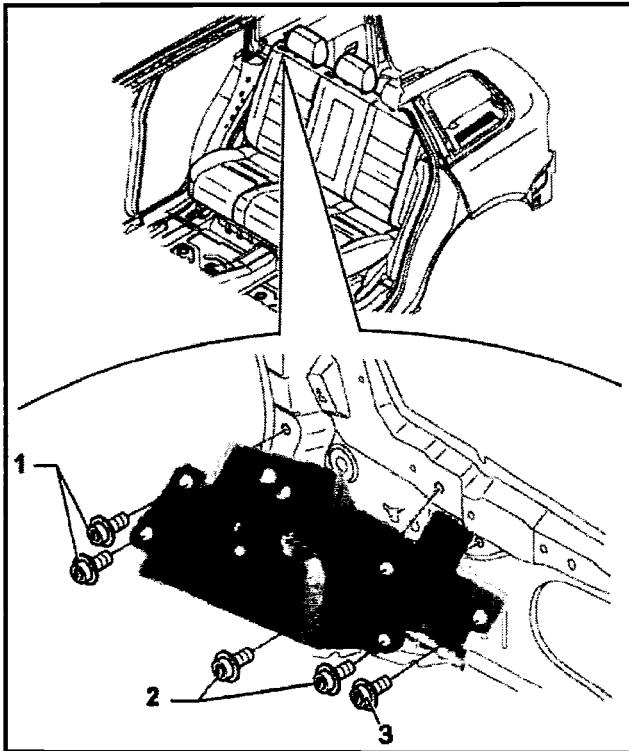
- ⇐ Open spare wheel cover
- ⇐ Using wedge T10039/1, pry lock carrier upward out of mountings



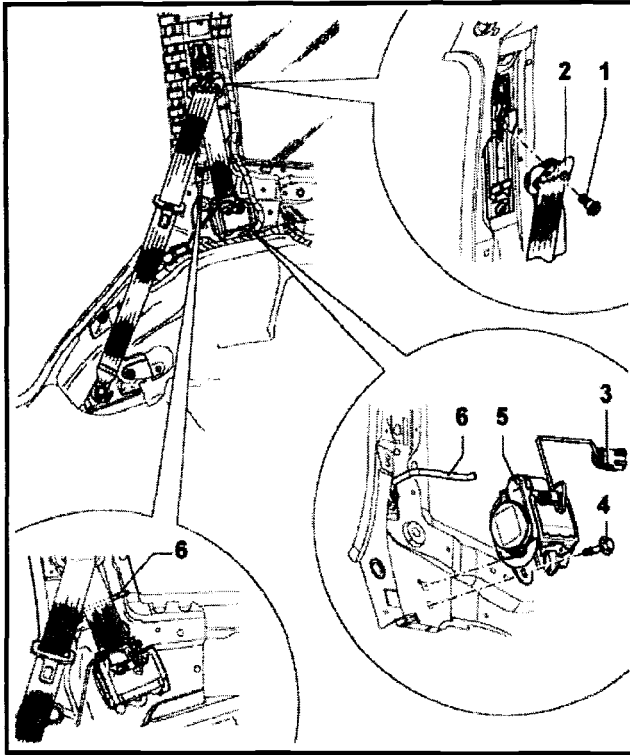
- ⇐ Remove bolts -1- and -2-
- Close spare wheel cover
- ⇐ Remove 2 bolts -3- and remove securing eye -4-
- ⇐ Remove securing eyes -5-, -6- and -7-
- ⇐ Remove spare wheel cover, right cover support -8- and left cover support -9- from the vehicle



- ⇐ Loosen lock nut -1- and remove locking pin -2-
- ⇐ Remove washer -3- and trim -4-
- ⇐ Remove bolts -5-, -6-, -7- and -8-
- ⇐ Use wedge T 10039 and pull out trim panel retaining clips -9- and -10- out of holes in body
- ⇐ Carefully lift trim panel at rear and pull off of retaining clips -11-



- ⇐ Remove Torx bolts -1-
- ⇐ Remove Torx bolts -2-
- ⇐ Remove hexagon bolt -3- and back rest mounting bracket

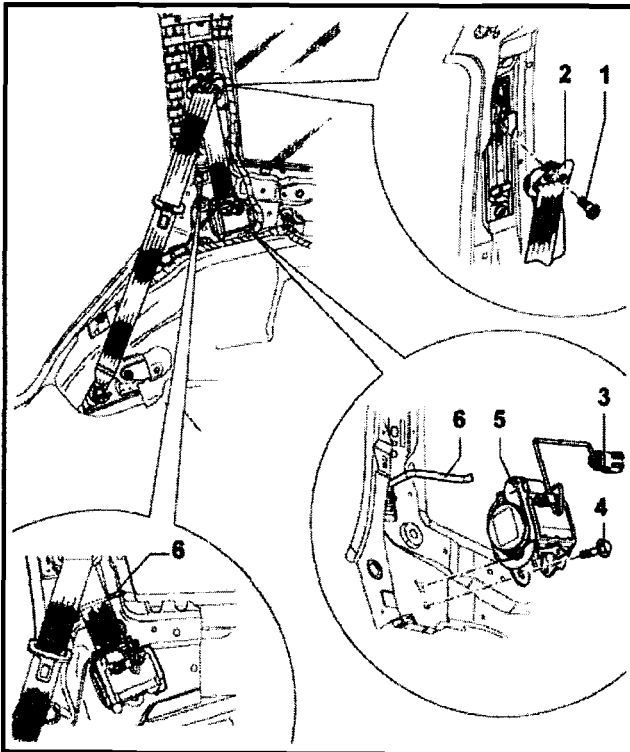


- ⇐ Remove bolt -1- and pull belt relay -2- off belt height adjuster

⚠
Electrostatic discharges can result in an inadvertent deployment of Airbag. Therefore, mechanic/technician must electrostatically discharge him/herself, before separating ignition and Ground (GND) wire. This is done e.g. by briefly touching body or door striker or pin.

- ⇐ Disconnect connector -3-
- ⇐ Remove bolt -4- and remove inertia reel -5- from body

Section C - Seat Belt Installation

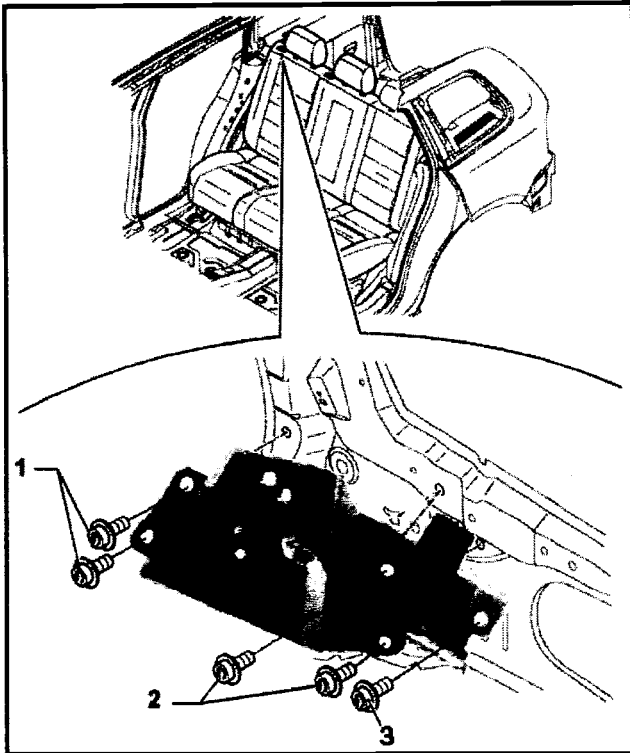


- ⇐ Install new seat belt (7L0 857 805A/806A dated 07.08.2004 (**7 August 2004**) or later) and using the V.A.G 1332 torque wrench, tighten bolt -4- to 50 Nm (37 ft. lbs.)

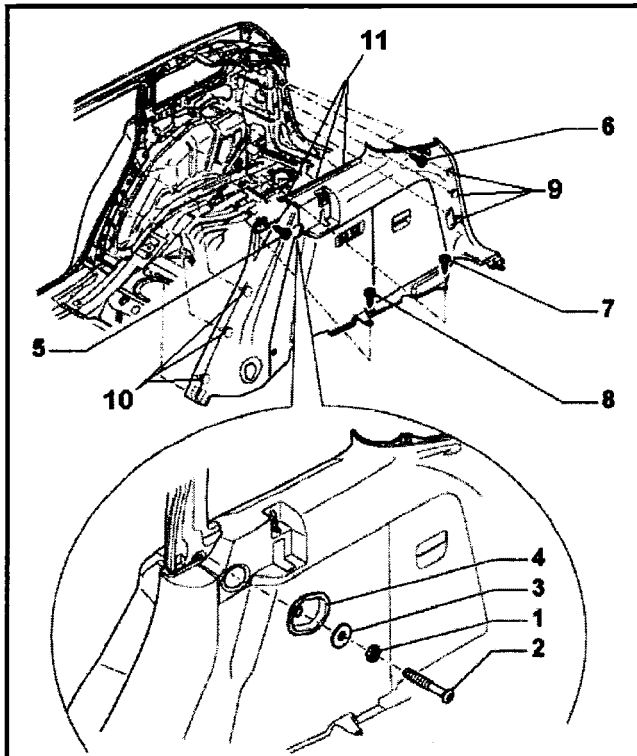
- ⇐ Reconnect connector -3-

⚠
Electrostatic discharges can result in an inadvertent deployment of Airbag. Therefore, mechanic/technician must electrostatically discharge him/herself, before separating ignition and Ground (GND) wire. This is done e.g. by briefly touching body or door striker or pin.

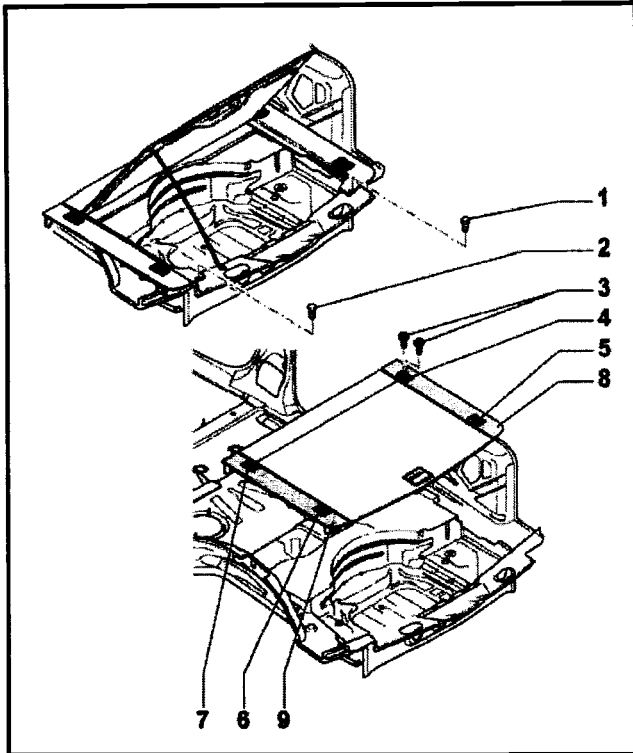
- ⇐ Secure belt relay -2- to belt height adjuster and tighten bolt -1- to 50 Nm (37 ft. lbs.)



- Using a wire brush, clean the threads on bolts -1-, -2- and -3-
- Apply Loctite® threadlocker blue 242 to threads on bolts -1-, -2- and -3-
- ⇐ Reinstall backrest mounting bracket, secure with Torx bolts -1- and -2- and tighten to 20 Nm (15ft. lbs.)
- ⇐ Reinstall hex bolt -3- and tighten to 20 Nm (15ft. lbs.)



- ⇐ Reinstall side trim onto clips -11-
- ⇐ Attach side trim to body with clips -10- and -9-
- ⇐ Secure trim with bolts -5-, -6-, -7- and -8-
- ⇐ Reinstall trim -4- and washer -3-
- ⇐ Reinstall locking pin -2- and tighten lock nut -1-



⇐ Reinstall right cover support -8- and left cover support -9-

⇐ Reinstall securing eyes -5-, -6- and -7-

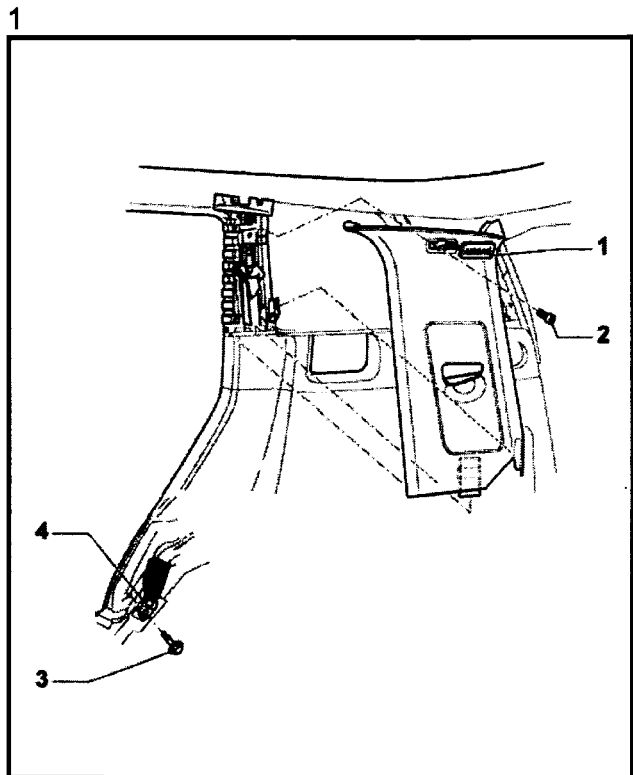
⇐ Reinstall securing eye -4- and 2 bolts -3-

⇐ Reinstall bolts -1- and -2-

- Reinstall lock carrier mounting

- Reinstall D-pillar trim

- Reinstall roof end strip



- Pull seat belt through opening and reinstall trim into mountings in body and door seal molding

⇐ Position seat belt anchor -4- on body and secure with bolt -3- and tighten to 50 Nm (37 ft. lbs.)

⇐ Secure trim with screw -2- and cover with air bag emblem -1-

- Reconnect batteries and tighten bolts to 9 Nm (80 in. lbs.)

- Perform battery restoration procedure

- Properly identify removed part(s) and store in a secure location at your dealership until directed otherwise.