

VOLKSWAGEN of America, Inc.

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DEFECTS INVESTIGATION
RECALL MGMT DIV.

07V-442
(4 Pages)

VIA FAX and FEDEX

Mr. Daniel Smith
Associate Administrator for Enforcement
National Highway Traffic Safety Administration
Attention: Recall Management Div. (NVS-215)
1200 New Jersey Avenue, S.E.
Washington, DC 20590

Rolf Bergmann Name
Process Leader Title
Safety Affairs Department
248-754-5548 Phone
248-754-5099 Fax
rolf.bergmann@vw.com E Mail

17 September 2007 Date

Subject: *Notification of Noncompliance – FMVSS 108 (Headlamps
– aiming provisions)
2005-2008 MY Jetta and 2006-2008 MY Rabbit/GTI/R32*

Volkswagen of America, Inc.
8000 Hamlin Road
Auburn Hills, MI 48326
Phone +1 248 754 5000
Fax +1 248 754 4930

Dear Mr. Smith:

This information is submitted in accordance with the requirements of Part 573 of Title 49 of the Code of Federal Regulations [49 CFR 573 (2007)].

573.6(c)(1)

Manufacturer's Name

Volkswagen AG (Germany)
Volkswagen de Mexico (Mexico)

Importer

Volkswagen of America, Inc. (VWoA)

573.6(c)(2)

Identification of Vehicles

Make : Volkswagen

Line and Model Years : Jetta, 2005-2008 MY
Rabbit/GTI/R32, 2006-2008 MY

Month/Year
of Manufacture : Jetta – from November 1, 2004
through TBD
Rabbit/GTI/R32 – from September
26, 2005 through TBD

VIN Numbers of
Affected Vehicles : Jetta - 3VW__ _1K_5M600049
through TBD

Rabbit/GTI/R32 - WVV__ _1K_6W018238
through TBD

573.6(c)(3)

**Number of Vehicles Potentially Containing the
Noncompliance**

Approximately 340,000 vehicles are affected by this
noncompliance in the United States.

573.6(c)(4)

**Percentage of Vehicles Actually Containing the
Noncompliance**

VWoA is unable to estimate the actual percentage of vehicles in
the United States that contain this noncompliance. Please see
also "Description of Noncompliance" below.

573.6(c)(5)

Description of the Noncompliance

Low beam horizontal aiming: Some of the affected vehicles
may not have had a required cap installed in production to
disable the headlight horizontal aim as required in FMVSS 108,
S7.8.2.1(c).

Vertical aiming: Some of the affected vehicles may contain a
cap that disables the vertical aiming screw, which does not
comply with FMVSS 108, S7.8.2.

Vertical aiming of low beam relative to the high beam: All of the affected vehicles contain an adjustment mechanism that allows aiming of the low beam relative to the high beam, which does not comply with FMVSS 108, S7.8.5.3(c)(1).

573.6(c)(6)

Basis for Determination

Basis: Determination based on notification of NHTSA compliance evaluation.

Date of determination: September 10, 2007

573.6(c)(7)

Noncompliance Test Result

Not applicable.

573.6(c)(8)

Proposed Remedial Program

Low beam horizontal aiming: Affected vehicles will be inspected for the presence of a cap in the socket of the low beam horizontal aiming screw. If the cap is missing, one will be installed.

Vertical aiming: Affected vehicles will be inspected for the presence of a cap in the socket of the vertical aiming screw and, if present, the cap will be removed.

Vertical aiming of low beam relative to the high beam: The adjustment mechanism will be disabled by plugging the socket.

Pending parts availability, mailing dates are anticipated as follows:

Dealers: on or before October 15, 2007

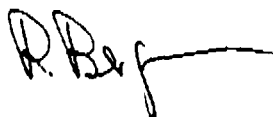
Owners: on or before October 31, 2007

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- 573.6(c)(10) **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 dealer/owner notification.
- 573.6(c)(11) **Proposed Owner Letter**
A draft owner's letter will be submitted to the agency for review and approval.
- 573.6(c)(12) **Manufacturer's Recall Code**
VWoA has assigned the code "Q8" to this recall.

Please contact me at 248-754-5548 for any additional information regarding this subject.

Sincerely,



Rolf Bergmann
Process Leader
Safety Affairs and Vehicle Testing