

VOLKSWAGEN

GROUP OF AMERICA

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Kathleen Demeter
Director, Office of Defects Investigation
U.S. Department of Transportation
National Highway Traffic Safety Administration
1200 New Jersey Avenue S.E.
Washington, DC 20590

OFFICE OF DEFECTS
INVESTIGATION

CHRISTOPHER T. SANDVIG NAME
GM - COMPLIANCE / TREAD TITLE
PRODUCT COMPLIANCE DEPARTMENT
248-754-5000 PHONE
248-754-5093 FAX
SEPTEMBER 28, 2009 DATE

Subject: AUDI A3/TT quattro® Fuel Tank Ventilation Valve

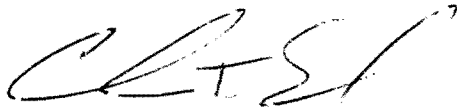
Dear Ms. Demeter:

Pursuant to a telephone conversation with Mr. Gregory Magno on July 23, 2009, Volkswagen Group of America is submitting a Notice of Defect along with this response to your email dated August 10, 2009 requesting vehicle suspension testing results along with relevant warranty field data.

VOLKSWAGEN GROUP OF AMERICA, INC
3800 HAMLIN ROAD
AUBURN HILLS, MI 48326
PHONE +1 248 754 5000

Please contact me if you have any questions regarding this response.

Regards,



Christopher T. Sandvig
GM - Compliance/TREAD
Service and Quality

Attachments

VOLKSWAGEN

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

CHRIS SANDVIG NAME
GENERAL MANAGER COMPLIANCE/TREAD TITLE
PRODUCT COMPLIANCE DEPARTMENT
248-754-5000 PHONE
248-754-5093 FAX
SEPTEMBER 28, 2009 DATE

Subject: **Notification of Voluntary Recall**
2006 – 2010 MY Audi A3 quattro®
2008 – 2010 MY Audi TT quattro® and Audi TT Roadster quattro®
Fuel Tank Ventilation Valve

VOLKSWAGEN GROUP OF AMERICA, INC.
3800 HAMLIN ROAD
AUBURN HILLS, MI 48326
PHONE +1 248 754 5000

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 (2009)).

573.6 (c) (1) **Manufacturer's Name**
AUDI AG

Importer
Volkswagen Group of America, Inc. (VWGoA)

573.6 (c) (2) **Identification of Vehicles**

Make : Audi
Line : A3, TT, TT Roadster
Model Year : 2006 – 2010 (A3)
2008 – 2010 (TT and TT Roadster)
Month/Year
of Manufacture : A3
September 29, 2005 through July 30, 2009

TT and TT Roadster
January 10, 2007 through August 26, 2009

VIN Numbers
of Affected Vehicles: A3
WAU ___ 8P_6A061021 – WAU ___ FM_AA038329

TT and TT Roadster
TRU ___ 8J_81000319 – TRU ___ FK_A1005282

Other Identification : Vehicles equipped with quattro® transmission

- 573.6 (c) (3) **Number of Vehicles Potentially Containing the Defect**
 Approximately 10,200 vehicles are affected by this recall in the United States.
- 573.6 (c) (4) **Percentage of Vehicles Actually Containing Defect**
 VWGoA is unable to estimate the percentage of vehicles in the United States that are subject to the defect.
- 573.6 (c) (5) **Description of Defect**
 The closing force of an internal spring of the fuel tank ventilation valve is not adequate enough to hold the valve closed under extreme conditions. During dynamic driving maneuvers, liquid fuel may enter the fuel tank venting system and migrate into the evaporative system, saturating the carbon canister. Should this occur while driving, the vehicle may experience performance issues (i.e., vehicle jerking) and the malfunction indicator lamp (MIL) in the instrument cluster could illuminate. In rare cases, fuel could leak from the evaporative system leak detection pump filter. A fuel leak, in the presence of an ignition source, can lead to a vehicle fire.
- 573.6 (c) (6) **Basis for Determination**
 On July 23, 2009, VWGoA received an inquiry into the scope of safety recall 09V-093 from the NHTSA. Upon conducting warranty claim analysis and vehicle suspension testing while developing our response to this inquiry, Volkswagen determined that, in rare circumstances, some Audi A3 quattro® and Audi TT/TT Roadster quattro® vehicles could be affected.

 Date of determination: September 21, 2009
- 573.6 (c) (7) **Noncompliance Test Result**
 Not applicable
- 573.6 (c) (8) **Proposed Remedial Program**
 Audi will replace the fuel tank ventilation valve on the affected vehicles with an improved valve.

 Pending parts availability, mailing dates are anticipated as follows:
Dealers: November 2009
Owners: November 2009
- 573.6 (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 dealer/owner notification.
- 573.6 (c) (10) **Proposed Owner Letter**
 A draft owner's letter will be submitted to the agency for review and approval.
- 573.6 (c) (11) **Manufacturer's Recall Code**
 VWGoA has assigned the code 20Q3/J3 for this recall.

Sincerely,



Christopher T. Sandvig
 General Manager-Compliance/TREAD
 Service & Quality

Warranty Data Overview

In response to this email inquiry, Volkswagen Group of America has identified 110 warranty claims on 96 unique vehicles. Of these, 14 claims contained allegations of fuel leaks which result in a warranty claim rate of 0.13%. Please reference the attached document, "*Warranty Data*" for a copy of these claims.

Vehicle Suspension Testing Results

Volkswagen Group of America is providing a summary of the vehicle suspension tests results. Please reference the attached document, "*Audi A3 and TT quattro®-Fuel Tank Ventilation Valve Summary of Suspension Test Results*". The file will be submitted by Volkswagen Group of America under a separate cover to NHTSA Office of Chief Counsel with Request for Confidential Treatment.

In summary, Volkswagen Group of America determined that the closing force of an internal spring in the fuel tank ventilation valve was not adequate enough to hold the valve closed under extreme conditions. Also, during dynamic driving manoeuvres liquid fuel could escape into the tank ventilation system through the opened fuel tank ventilation valve. This will only occur in very rare cases as supported by our overall low claims rate.

Volkswagen Group of America has decided to issue a voluntary safety recall based on our quality commitment as a premium vehicle manufacturer with a strong focus on customer safety. Please reference the attached document, *Defect Information Report 573*.