

# VOLKSWAGEN

GROUP OF AMERICA

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  
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MAY 11, 2009 DATE

Subject: Voluntary Recall 09V-097 (Volkswagen Code 69H3/S3)  
2009 MY Volkswagen CC  
Inspect and If Necessary, Reroute or Replace Right Front Passenger Seat  
Belt Buckle Wiring Harness

Dear Mr. Smith:

This will amend our Part 573 report dated March 18, 2009 by adding a chronology of events to part 573.6 (c) (6) as follows:

VOLKSWAGEN GROUP OF AMERICA, INC.  
3800 HAMLIN ROAD  
AUBURN HILLS, MI 48326  
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**573.6 (c) (6) Description of Defect and Chronology of Events**

**Chronology of Events**

- Starting in October 2008, the MY 2009 Volkswagen CC was offered for sale in the U.S.
- On October 31, 2008, Volkswagen received field information from an initial launch report mentioning five consumer reports relating to "electrical failures of the belt lock."
- On November 05, 2008, Volkswagen AG received the first report from the seat supplier analyzing the concern. The report stated that the passenger seat belt buckle wires could possibly be damaged by the seat rails if the seat were to be moved fully up, down, fore, or aft. The condition was caused by a clip that was installed in the incorrect position (assembly issue) as well as a wiring harness that deviated from the manufacturer's specifications. These conditions were corrected in series production.
- On November 21, 2008, Volkswagen's product safety committee was informed about the issue. At that time, Volkswagen was aware of a total of 11 reported field complaints. Volkswagen had delivered 4,659 vehicles to dealers/customers, resulting in a low complaint rate of 0.2%. Therefore, to ensure customer satisfaction, Volkswagen decided to implement a required vehicle update technical bulletin to fix the issue in the potentially affected vehicles.
- In mid-January 2009, Volkswagen Group of America placed a telephone call advising Volkswagen AG that the issue identified in the launch report showed an increasing trend.

- From mid-January through February 2009, a detailed investigation and technical discussions continued within Volkswagen AG to determine possible consequences of the failure. These discussions revealed that in the event that two wires (of the five wires in the seat belt buckle wiring harness) used for the seat belt buckle detection become damaged, the passenger occupancy detection system will continue to operate and the airbag will deploy as designed. The airbag warning light will illuminate to inform the customer about a possible malfunction. In the event that the other three wires (of the five wires in the seat belt buckle wiring harness) used for the belt force sensor become damaged, the airbag malfunction light and the airbag OFF light will both illuminate. This occurs because the fallback algorithm of the airbag system is set to deactivate the passenger airbag when the ability to properly classify the "type" of passenger is compromised.
- On March 12, 2009, Volkswagen's product safety committee was updated on the status of complaints as well as the potential consequences of the failure. Based on this knowledge and a total of 23 reported field complaints, the committee agreed to issue voluntary recall 09V-097.

Sincerely,



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