

**RECEIVED**

By delia.lopez at 3:41 pm, Jan 21, 2011

11V-031  
(3 Pages)

# 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

CHRISTOPHER T. SANDVIG NAME  
GENERAL MANAGER COMPLIANCE/TREAD TITLE  
PRODUCT COMPLIANCE DEPARTMENT  
248-754-5000 PHONE  
248-754-5093 FAX  
JANUARY 21, 2011 DATE

Subject: Notification of Compliance Recall  
2010 Model Year Volkswagen New Beetle and New Beetle Convertible  
Vehicles Certified to FMVSS 208

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 (2011)).

573.6 (c) (1) **Manufacturer's Name**  
Volkswagen de Mexico, A.A. de C.V.

**Importer**  
Volkswagen Group of America, Inc. (VWGoA)

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

Make : Volkswagen

Line : New Beetle and New Beetle Convertible

Model Year : 2010

Month/Year  
of Manufacture : New Beetle: September 1, 2010 – September 22, 2010  
New Beetle Convertible: September 02, 2010

**VIN Numbers of Affected Vehicles:**

## New Beetle Convertible

## New Beetle

## New Beetle

## New Beetle

## New Beetle

## New Beetle

## New Beetle

## New Beetle

## New Beetle

## New Beetle

## New Beetle

## New Beetle

## New Beetle

## New Beetle

## New Beetle

## New Beetle

## New Beetle

## New Beetle

## New Beetle

## New Beetle

## New Beetle

## New Beetle

## New Beetle

## New Beetle

## New Beetle

## New Beetle

## New Beetle

Other Identification : None

**573.6 (c) (3) Number of Vehicles Potentially Containing the Non-compliance**

Twenty-six (26) Volkswagen New Beetle vehicles and one (1) Volkswagen New Beetle Convertible are affected by this non-compliance in the United States

**573.6 (c) (4) Percentage of Vehicles Actually Containing Non-compliance**

100% of the affected vehicles in the United States are subject to the non-compliance.

**573.6 (c) (5) Description of Non-compliance**

The affected vehicles do not meet the new FMVSS 208, S5.1.1(b)(2) barrier test requirements that went into effect on September 01, 2010. The final assembly of these vehicles took place during a brief period after the new regulation went into effect but met the FMVSS 208 requirements that ended on August 31, 2010.

573.6 (c) (6) **Basis for Determination**

January 13, 2011: During a routine production analysis monitoring phase-in for FMVSS, VWGoA identified a small population of 2010 model year New Beetle vehicles that appeared to be noncompliant with FMVSS 208, S5.1.1(b)(2) Barrier Test Requirements for vehicles produced after September 01, 2010.

January 14, 2011: VWGoA informed the manufacturing factory (VW de Mexico) and VWAG of the potential non-compliance.

January 14 – January 19, 2011: Internal investigations at VW de Mexico and VWAG to confirm production dates of potentially noncompliant vehicles.

January 19, 2011: Determination of non-compliance based on internal investigations by VWAG.

Volkswagen has not identified any reports or allegations of actual injury or crash resulting from this non-compliance.

Date of determination: January 19, 2011

573.6 (c) (7) **Non-compliance Test Result**

Affected vehicles are 100% noncompliant with FMVSS 208, S5.1.1(b)(2) Barrier Test Requirements for vehicles produced after September 01, 2010

573.6 (c) (8) **Proposed Remedial Program**

VWGoA will notify the affected customers and will offer to replace their vehicle with a comparable vehicle that was produced prior to September 01, 2010 and thus compliant with FMVSS 208 requirements in force until August 31, 2010.

Customer notification will begin on February 01, 2011.

VWGoA has assigned the code 63A5/U5 to this action.

Sincerely,



Christopher T. Sandvig  
General Manager Compliance/TREAD