VOLKSWAGEN

GROUP OF AMERICA

12V-331 3 Pages

Ms. Nancy Lummen Lewis Acting Associate Administrator for Enforcement National Highway Traffic Safety Administration Attention: Recall Management Division (NVS-215) 1200 New Jersey Avenue, S.E. Washington, DC 20590

Subject: Notification of Voluntary Non-Compliance Recall 2012 Model Year Volkswagen Beetle Incorrect Tire Installation at Factory CHRISTOPHER T. SANDVIG NAME GENERAL MANAGER COMPLIANCE/TREAD TITLE PRODUCT COMPLIANCE DEPARTMENT 248-754-5000 PHONE 248-754-5093 FAX JULY 13, 2012 DATE

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

Dear Ms. Lewis:

This information is submitted in accordance with the requirements of Part 573 of Title 49 of the Code of Federal Regulations (49 CFR 573 (2012)).

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 : Beetle

 Model Year
 : 2012

 Month/Year
 .

 of Manufacture
 : August – September 2011

 VIN Numbers
 .

 of Affected Vehicles
 : 3VWJP7AT0CM

 3VWJP7AT1CM
 3VWJP7AT1CM

 3VWJP7AT2CM
 3VWJP7AT2CM

3VWJP7AT2CM

3VWJP7AT3CN

3VWJP7AT3CN

3VWJP7AT6CM

3VWJP7AT7CM

3VWJP7AT8CM

3VWJP7AT1CN 3VWJP7AT1CM 3VWJP7AT2CM 3VWJP7AT3CN 3VWJP7AT3CN 3VWJP7AT4CN 3VWJP7AT7CN 3VWJP7AT8CN

3VWJP7AT2CM

3VWJP7AT3CM

3VWJP7AT4CM

3VWJP7AT7CM

3VWJP7AT8CM

3VWJP7AT9CM

| 3VWJP7AT9CM | 3VWJP7AT9CN | 3VWJP7AT9CN |
|-------------|-------------|-------------|
| 3VWJP7ATXCM | 3VWJP7ATXCM | 3VWJP7ATXCN |
| 3VWJP7ATXCM | 3VWJP7ATXCM | 3VWVA7AT2CM |
| 3VWVA7AT3CM | 3VWVA7AT4CN | 3VWVA7AT5CN |
| 3VWVA7AT6CM | 3VWVA7AT6CN | 3VWVA7AT8CN |
| 3VWVA7AT9CM | | |

Other Identification : None.

- 573.6 (c) (3) Number of Vehicles Potentially Containing the Non-Compliance Forty-six (46) vehicles are affected by this non-compliance in the United States.
- 573.6 (c) (4) <u>Percentage of Vehicles Actually Containing the Non-Compliance</u> 100%

573.6 (c) (5) **Description of Defect**

Due to an error at the factory, the affected vehicles were produced with summer tires that are possibly not in compliance with Federal Motor Vehicle Safety Standards 110 "Tire Selection & Rims" and 139 "New Pneumatic Tires for Light Vehicles."

VWGoA is not aware of any claim of accident or injury caused by this issue.

573.6 (c) (6) Basis for Determination

- On June 26, 2012 incorrect tires were detected on a 2012 model year Beetle by Volkswagen field personnel.
- This information was promptly reported to VWGoA Product Support, who then investigated the issue with the factory and discovered that forty-six (46) 2012 model year Beetle vehicles had been manufactured with improper summer tires.
- On July 4, 2012 Volkswagen AG was informed about the findings.
- On July 5, 2012 the Technical Development team at the assembly plant confirmed that FMVSS 110 and 139 compliance had not been tested for these tires and that the tires are not certified for use in the United States.
- On July 6, 2012 Volkswagen AG decided to conduct a voluntary non-compliance recall.

573.6 (c) (7) <u>Noncompliance Test Result</u> Not applicable

573.6 (c) (8) Proposed Remedial Program

When sufficient quantities of replacement tires are available, VWGoA plans to notify all owners of affected vehicles and will instruct them to arrange for an appointment with an authorized Volkswagen dealer. Dealers will replace the tires on the affected vehicles at no cost to customers.

Pending parts availability, mailing dates are anticipated as follows:

Dealers: On or about September 2012 **Owners:** On or about September 2012

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) <u>Manufacturer's Recall Code</u> VWGoA has assigned the code 44K8/W4 to this recall.

Sincerely,

Christopher T. Sandvig General Manager Compliance/TREAD

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