

VOLKSWAGEN

GROUP OF AMERICA

Ms. Sarah Shiver
RMD Recall Analyst
National Highway Traffic Safety Administration
Attention: Recall Management Division (NVS-215)
1200 New Jersey Avenue, S.E.
Washington, DC 20590

Christopher T. Sandvig NAME
Director, Group Customer Protection Title
Group Customer Protection Department
248-754-5000 Phone
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May 18, 2018 Date

Subject: Recall Information Inquiry – Compliance Recall 17V-280/ VW Recall Code 51F5

Dear Ms. Shiver:

Pursuant to your email inquiry dated May 01, 2018, Volkswagen Group of America, Inc. ("VWGoA") hereby submits the following response regarding the chronology for compliance recall 17V-280/ VW recall code 51F5:

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Compliance recall 51F5 addresses an incorrect vehicle production date that was erroneously printed on the Safety Certification label on certain 2015 MY Audi A3 vehicles. Due to the print production error, the labels installed on the subject vehicles were non-compliant with 49 CFR Part 567 – Certification, specifically §567.4(g) (2).

Explanation of Chronology:

- The incorrect vehicle production date on the subject Safety Certification labels was identified in January 2016 during a routine factory audit of service replacement labels.
- The matter was brought to the Audi AG Product Safety Committee in January 2016, and at that time the committee decided to perform a label replacement campaign.
- In March 2016, Audi AG sent a supply of VIN-specific replacement labels to VWGoA; however it was determined upon receipt that the labels were not usable. VWGoA requested additional support from Audi AG with regard to other options (ie: possible use of a label overlay) and Audi AG agreed to research further to identify whether or not this was acceptable.
- After further evaluation and research, the topic was presented again to the Audi AG Product Safety Committee during the first quarter of CY 2017.
- On April 19, 2017, the Audi AG Product Safety Committee took up the issue and decided that the labels installed on the subject vehicles were non-compliant with 49 CFR Part 567 – Certification, specifically §567.4(g) (2) and the recall decision was made.
- On April 26, 2017 VWGoA filed the 573/noncompliance report with NHTSA.
- VWGoA is continuing to research this topic with Audi AG.

Sincerely,



Christopher T. Sandvig, Director
Group Customer Protection