

# Part 573 Safety Recall Report

# 18V-329

**Manufacturer Name :** Volkswagen Group of America, Inc.**Submission Date :** MAR 14, 2019**NHTSA Recall No. :** 18V-329**Manufacturer Recall No. :** 01C5/01C6**Manufacturer Information :**

Manufacturer Name : Volkswagen Group of America, Inc.

Address : 3800 Hamlin Road

Auburn Hills MI 48326

Company phone : 1-800-893-5298

**Population :**

Number of potentially involved : 252

Estimated percentage with defect : 100 %

**Vehicle Information :**

Vehicle 1 : 2017-2017 Volkswagen Tiguan

Vehicle Type :

Body Style :

Power Train : NR

**Descriptive Information :** 01C6 - Recalled vehicles are zero-series vehicles (very early production vehicles). Volkswagen has discovered that documentation about some of the possible modification(s) made to these vehicles during their internal use period may be incomplete. Because of this, Volkswagen cannot verify that the vehicles comply with all applicable regulatory requirements. The recalled vehicles differ from non-recalled vehicles in that the actual build status of the recalled population was not properly documented in Volkswagen's IT systems.

Tiguan vehicle count: 1

Production Dates : JUL 08, 2016 - JUL 08, 2016

VIN Range 1 : Begin : WVGWV7AX9HK001286 End : WVGWV7AX9HK001286  Not sequential

Vehicle 2 : 2012-2016 Volkswagen Eos

Vehicle Type :

Body Style :

Power Train : NR

**Descriptive Information :** 01C5 - Recalled vehicles are zero-series vehicles (very early production vehicles). Volkswagen has discovered that documentation about some of the possible modification(s) made to these vehicles during their internal use period may be incomplete. Because of this, Volkswagen cannot verify that the vehicles comply with all applicable regulatory requirements. The recalled vehicles differ from non-recalled vehicles in that the actual build status of the recalled population was not properly documented in Volkswagen's IT systems.

Eos vehicle count: 40

Production Dates : FEB 16, 2011 - APR 02, 2015

VIN Range 1 : Begin : WVFW7AH1CV000781 End : WVWBW8AH4GV000011  Not sequential

Vehicle 3 : 2013-2016 Volkswagen CC (F)

Vehicle Type :

Body Style :

Power Train : NR

Descriptive Information : 01C5 - Recalled vehicles are zero-series vehicles (very early production vehicles). Volkswagen has discovered that documentation about some of the possible modification(s) made to these vehicles during their internal use period may be incomplete. Because of this, Volkswagen cannot verify that the vehicles comply with all applicable regulatory requirements. The recalled vehicles differ from non-recalled vehicles in that the actual build status of the recalled population was not properly documented in Volkswagen's IT systems.  
CC(F) vehicle count: 39

Production Dates : JAN 19, 2012 - NOV 18, 2015

VIN Range 1 : Begin : WVWAP7AN9DE500024 End : WVWKP7AN1GE509289  Not sequential

Vehicle 4 : 2012-2012 Volkswagen CC

Vehicle Type :

Body Style :

Power Train : NR

Descriptive Information : 01C5 - Recalled vehicles are zero-series vehicles (very early production vehicles). Volkswagen has discovered that documentation about some of the possible modification(s) made to these vehicles during their internal use period may be incomplete. Because of this, Volkswagen cannot verify that the vehicles comply with all applicable regulatory requirements. The recalled vehicles differ from non-recalled vehicles in that the actual build status of the recalled population was not properly documented in Volkswagen's IT systems.  
CC vehicle count: 6

Production Dates : MAR 02, 2011 - MAR 02, 2011

VIN Range 1 : Begin : WVWNN7AN9CE507027 End : WVWHN7ANXCE508202  Not sequential

Vehicle 5 : 2011-2013 Volkswagen GTI (A6)

Vehicle Type :

Body Style :

Power Train : NR

Descriptive Information : 01C5 - Recalled vehicles are zero-series vehicles (very early production vehicles). Volkswagen has discovered that documentation about some of the possible modification(s) made to these vehicles during their internal use period may be incomplete. Because of this, Volkswagen cannot verify that the vehicles comply with all applicable regulatory requirements. The recalled vehicles differ from non-recalled vehicles in that the actual build status of the recalled population was not properly documented in Volkswagen's IT systems.  
GTi vehicle count: 12

Production Dates : FEB 25, 2011 - APR 17, 2013

VIN Range 1 : Begin : WVWFV7AJ2BW218372 End : WVWED7AJ6DW134105  Not sequential

Vehicle 6 : 2015-2015 Volkswagen e-Golf

Vehicle Type :

Body Style :

Power Train : NR

Descriptive Information : 01C5 - Recalled vehicles are zero-series vehicles (very early production vehicles). Volkswagen has discovered that documentation about some of the possible modification(s) made to these vehicles during their internal use period may be incomplete. Because of this, Volkswagen cannot verify that the vehicles comply with all applicable regulatory requirements. The recalled vehicles differ from non-recalled vehicles in that the actual build status of the recalled population was not properly documented in Volkswagen's IT systems.  
e-Golf vehicle count: 6

Production Dates : MAY 21, 2014 - MAR 03, 2015

VIN Range 1 : Begin : WVWPP7AU1FW900089 End : WVWPP7AU6FW908351  Not sequential

Vehicle 7 : 2012-2012 Volkswagen Tiguan

Vehicle Type :

Body Style :

Power Train : NR

Descriptive Information : 01C6 - Recalled vehicles are zero-series vehicles (very early production vehicles). Volkswagen has discovered that documentation about some of the possible modification(s) made to these vehicles during their internal use period may be incomplete. Because of this, Volkswagen cannot verify that the vehicles comply with all applicable regulatory requirements. The recalled vehicles differ from non-recalled vehicles in that the actual build status of the recalled population was not properly documented in Volkswagen's IT systems.  
Tiguan vehicle count: 1

Production Dates : JUN 23, 2011 - JUN 23, 2011

VIN Range 1 : Begin : WVGAV7AXXCW500173 End : WVGAV7AXXCW500173  Not sequential

Vehicle 8 : 2011-2014 Volkswagen Touareg (New)

Vehicle Type :

Body Style :

Power Train : NR

Descriptive Information : 01C5- Recalled vehicles are zero-series vehicles (very early production vehicles). Volkswagen has discovered that documentation about some of the possible modification(s) made to these vehicles during their internal use period may be incomplete. Because of this, Volkswagen cannot verify that the vehicles comply with all applicable regulatory requirements. The recalled vehicles differ from non-recalled vehicles in that the actual build status of the recalled population was not properly documented in Volkswagen's IT systems.  
Touareg (New) vehicle count: 45

Production Dates : OCT 28, 2010 - FEB 12, 2014

VIN Range 1 : Begin : WVGFG9BP2BD002456 End : WVGDP9BP9ED009335  Not sequential

Vehicle 9 : 2015-2015 Volkswagen Touareg (GP)

Vehicle Type :

Body Style :

Power Train : NR

Descriptive Information : 01C5 - Recalled vehicles are zero-series vehicles (very early production vehicles). Volkswagen has discovered that documentation about some of the possible modification(s) made to these vehicles during their internal use period may be incomplete. Because of this, Volkswagen cannot verify that the vehicles comply with all applicable regulatory requirements. The recalled vehicles differ from non-recalled vehicles in that the actual build status of the recalled population was not properly documented in Volkswagen's IT systems.

Touareg (GP) vehicle count: 6

Production Dates : OCT 02, 2014 - NOV 10, 2014

VIN Range 1 : Begin : WVGE9BP0FD001288 End : WVGE9BP9FD003086  Not sequential

Vehicle 10 : 2012-2015 Volkswagen Tiguan

Vehicle Type :

Body Style :

Power Train : NR

Descriptive Information : 01C5 - Recalled vehicles are zero-series vehicles (very early production vehicles). Volkswagen has discovered that documentation about some of the possible modification(s) made to these vehicles during their internal use period may be incomplete. Because of this, Volkswagen cannot verify that the vehicles comply with all applicable regulatory requirements. The recalled vehicles differ from non-recalled vehicles in that the actual build status of the recalled population was not properly documented in Volkswagen's IT systems.

Tiguan vehicle count: 53

Production Dates : FEB 28, 2011 - DEC 23, 2014

VIN Range 1 : Begin : WVGBV7AX5CW000006 End : WVGAV7AX3FW567184  Not sequential

Vehicle 11 : 2013-2015 Volkswagen Golf (A6)

Vehicle Type :

Body Style :

Power Train : NR

Descriptive Information : 01C6 - Recalled vehicles are zero-series vehicles (very early production vehicles). Volkswagen has discovered that documentation about some of the possible modification(s) made to these vehicles during their internal use period may be incomplete. Because of this, Volkswagen cannot verify that the vehicles comply with all applicable regulatory requirements. The recalled vehicles differ from non-recalled vehicles in that the actual build status of the recalled population was not properly documented in Volkswagen's IT systems.

Golf (A6) vehicle count: 15

Production Dates : MAR 22, 2012 - NOV 08, 2014

VIN Range 1 : Begin : VVWAB7AJ1DW000025 End : VVWLF7AU3FW140152  Not sequential

Vehicle 12 : 2011-2016 Volkswagen Golf (A6)

Vehicle Type :

Body Style :

Power Train : NR

Descriptive Information : 01C5 - Recalled vehicles are zero-series vehicles (very early production vehicles). Volkswagen has discovered that documentation about some of the possible modification(s) made to these vehicles during their internal use period may be incomplete. Because of this, Volkswagen cannot verify that the vehicles comply with all applicable regulatory requirements. The recalled vehicles differ from non-recalled vehicles in that the actual build status of the recalled population was not properly documented in Volkswagen's IT systems.  
Golf (A6) vehicle count: 26

Production Dates : MAR 02, 2011 - OCT 27, 2015

VIN Range 1 : Begin : WVWMM7AJ8BW228527 End : WVWUF7AU8GW138533  Not sequential

Vehicle 13 : 2015-2016 Volkswagen e-Golf

Vehicle Type :

Body Style :

Power Train : NR

Descriptive Information : 01C6 - Recalled vehicles are zero-series vehicles (very early production vehicles). Volkswagen has discovered that documentation about some of the possible modification(s) made to these vehicles during their internal use period may be incomplete. Because of this, Volkswagen cannot verify that the vehicles comply with all applicable regulatory requirements. The recalled vehicles differ from non-recalled vehicles in that the actual build status of the recalled population was not properly documented in Volkswagen's IT systems.

e-Golf vehicle count: 2

Production Dates : MAR 03, 2015 - OCT 23, 2015

VIN Range 1 : Begin : WVWPP7AU8FW908352 End : WVWKP7AU0GW903559  Not sequential

## Description of Noncompliance :

Description of the Noncompliance : A small number of zero-series vehicles (very early production vehicles) were sold as used after they were no longer needed for internal use. Volkswagen has discovered that documentation about possible modification(s) made during the internal use period may be incomplete. Because of this, Volkswagen cannot verify that the vehicles comply with all applicable regulatory requirements. Out of an abundance of caution, Volkswagen has decided to repurchase and remove the affected vehicles from the market. Volkswagen is not aware of any accidents or injuries as a result of this issue.

FMVSS 1 : NR

FMVSS 2 : NR

Description of the Safety Risk : Volkswagen cannot verify that the vehicles comply with all applicable

**Description of the Safety Risk :** regulatory requirements. Out of an abundance of caution, Volkswagen has decided to repurchase and remove the affected vehicles from the market. Due to the missing documentation and unknown potential for modifications made during internal use, Volkswagen cannot specifically identify a safety risk. Volkswagen is not aware of any accidents or injuries as a result of this issue.

**Description of the Cause :** The established processes to ensure complete documentation of modification (s) made during internal vehicle use were not properly followed.

**Identification of Any Warning that can Occur :** NR

## Supplier Identification :

### Component Manufacturer

**Name :** Volkswagen Group of America  
**Address :** 3800 Hamlin Road  
Auburn Hills MICHIGAN 48326  
**Country :** United States

## Chronology :

August 2016: Internal revision report detected pre- and zero-series vehicles sold to customers. For these vehicles at that point usage documentation was unknown

September 2016: Topic was presented in pre-Product Safety Committee of Volkswagen AG. Additional details were requested.

November 2016: Topic was presented to Product Safety Committee of Volkswagen AG. Decision to repurchase pre-series vehicles (no US vehicles were affected). Dealer reports showed that some of these vehicles couldn't be repaired due to diagnosis problems or couldn't be adapted after parts replacement. Analysis started in order to understand and research status of zero-series vehicles.

April 2017: Topic presented in Product Safety Committee of Volkswagen AG. First analysis results were presented. High complexity due to various hardware/software combinations was detected, of which not all could be identified in IT systems. Task started to cluster hardware/software combinations in order to identify all possible combinations and to evaluate impact.

September 2017: Topic presented in Product Safety Committee of Volkswagen AG; presentation of results of clustering task. Evaluation presented how zero-series vehicles could be identified at time of workshop repair visit to support dealer. Task to develop a more detailed clustering to get a better understanding of the hardware/software combinations.

May 09, 2018: Topic presented in Product Safety Committee of Volkswagen AG were the decision to recall certain zero-series vehicles due to unknown actual vehicle configuration due to missing/incomplete documentation was made. The recall decision was not based on a confirmed safety risk but was based on the fact that the actual vehicle configuration and compliance with applicable standards is unknown. Vehicles may or may not be repairable with replacement parts or existing software updates.

**Description of Remedy :**

Description of Remedy Program : Volkswagen has identified a list of approximately 233 zero-series vehicles that are unable to be repaired with parts or software updates, and will offer to repurchase these vehicles. The remaining affected vehicles will be repaired with updated parts/software as needed to bring them up to required production standards. Volkswagen is not planning to offer a reimbursement program under this recall.

How Remedy Component Differs from Recalled Component : The recalled vehicles are zero-series vehicles with an unknown vehicle configuration that may not comply with all applicable regulatory requirements. Volkswagen will offer to repurchase or repair (if possible) the affected vehicles. Vehicles not included in this recall are zero-series vehicles that have received modification(s) that were properly documented as per internal processes/requirements.

Identify How/When Recall Condition was Corrected in Production : Vehicles may have been modified during internal use after production was completed.

In August 2016, processes were been implemented in internal IT systems to prevent the sale of special build (e.g. zero-series vehicles) to consumers.

In August 2017, new organizational/process instructions were enacted. New processes ensure that only vehicles conforming to series configuration may be released for sale to consumers.

**Recall Schedule :**

Description of Recall Schedule : Dealer/Owner notification anticipated by July 2018

Planned Dealer Notification Date : JUL 12, 2018 - JUL 12, 2018

Planned Owner Notification Date : JUL 13, 2018 - JUL 13, 2018

\* NR - Not Reported