OMB Control No.: 2127-0004

Part 573 Safety Recall Report

19V-389

Manufacturer Name: Volkswagen Group of America, Inc.

NHTSA Recall No.: 19V-389

Manufacturer Recall No.: 94L9



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: 662,185

Estimated percentage with defect: 7 %

Vehicle Information:

Vehicle 1: 2016-2019 Volkswagen Passat (GP)

Vehicle Type :
Body Style :
Power Train : NR

Descriptive Information: Vehicles included in this recall (built during a certain time period) may not have had

the required caps installed to disable the headlight horizontal aim as required by Federal Regulations. Vehicles not included in this recall were built with the required

headlight caps installed.

Passat (GP) vehicle count: 122222

Production Dates: APR 20, 2015 - JAN 14, 2019

VIN Range 1: Begin: 1VWAS7A39GC000438 End: 1VWLA7A35KC014664 ✓ Not sequential

Vehicle 2: 2018-2019 Volkswagen Atlas

Vehicle Type :
Body Style :
Power Train : NR

Descriptive Information: Vehicles included in this recall (built during a certain time period) may not have had

the required caps installed to disable the headlight horizontal aim as required by Federal Regulations. Vehicles not included in this recall were built with the required

headlight caps installed. Atlas vehicle count: 116055

Production Dates: NOV 17, 2016 - FEB 12, 2019

VIN Range 1: Begin: 1V2NR2CA2JC500090 End: 1V2UR2CA6KC540850 ✓ Not sequential

Vehicle 3: 2020-2020 Volkswagen Passat (PA2)

Vehicle Type : Body Style :

Power Train: NR

Descriptive Information: Vehicles included in this recall (built during a certain time period) may not have had

the required caps installed to disable the headlight horizontal aim as required by Federal Regulations. Vehicles not included in this recall were built with the required

headlight caps installed.

Passat (PA2) vehicle count: 15

Production Dates: OCT 17, 2018 - DEC 19, 2018

Vehicle 4: 2012-2015 Volkswagen Passat

Vehicle Type : Body Style : Power Train : NR

Descriptive Information: Vehicles included in this recall (built during a certain time period) may not have had

the required caps installed to disable the headlight horizontal aim as required by Federal Regulations. Vehicles not included in this recall were built with the required

headlight caps installed. Passat vehicle count: 423893

Production Dates: DEC 23, 2010 - OCT 02, 2015

VIN Range 1: Begin: 1VWAP7A38CC000149 End: 1VWAT7A33FC200016 ✓ Not sequential

Description of Noncompliance:

Description of the According to Federal Motor Vehicle Safety Standard (FMVSS) 108, the

Noncompliance: headlight is not permitted to have a horizontal adjustment. The horizontal

adjuster is blocked from further adjustment by means of a cap (after the initial adjustment is performed in the production process). Some vehicles did not

have the required cap installed.

FMVSS 1: 108 - Lamps, reflective devices, and assoc. Equipment

FMVSS 2: NR

Description of the Safety Risk: Incorrectly adjusted headlights may result in reduced visibility (for the driver

and other motorists) which could increase the risk of a crash.

Description of the Cause: Incorrect or missing work instructions to install the headlight caps after

performing the headlight adjustment in the factory.

Identification of Any Warning NR

that can Occur:

Supplier Identification:

Component Manufacturer

Name: Volkswagen Group of America, Inc.

Address: 3800 Hamlin Road

Auburn Hills MICHIGAN 48326

Country: United States

Chronology:

Late January 2019: Process analysis at the factory identifies missing instructions in the Standard Work Process and missing and incorrect Instructions in the Product Detail Montage (PDM), relating to the installation of headlight adjuster caps.

February 2019: Work instructions corrected and inspection of Atlas and Passat headlights at CP8 (Chattanooga factory grounds), external yards, and auction center to determine impact of missing instructions.

March and April 2019: Discussion with supplier and internal clarification of regulatory requirements, affected population, and countermeasures.

May 06, 2019: Topic was presented in the Product Safety Committee pre-clearing.

May 10, 2019: Further analysis and clarification by the factory and VWAG, including testing of whether, and to what extent, horizontal adjustment is possible and the impact on compliance with thresholds in FMVSS 108. May 15, 2019: Topic was presented to the Volkswagen Product Safety Committee and a non-compliance was determined for both Atlas and Passat vehicles.

Description of Remedy:

Description of Remedy Program: Inspect the left and right headlight for presence of blocking cap on

horizontal adjuster. If a cap is missing, the adjustment mechanism will be blocked. A repair method is under evaluation. The recall repair will be performed free of charge to customers. Volkswagen will not offer a

reimbursement program under this recall.

How Remedy Component Differs The recalled part number of the blocking cap is 4E0 941 041. For the recall

from Recalled Component: remedy, the adjustment mechanism will be blocked with an component/

procedure (currently under evaluation).

 $Identify\ How/When\ Recall\ Condition \\ O4/02/2019:\ Worker\ instructions\ were\ revised\ to\ include\ cap\ installation$

was Corrected in Production: at the headlight alignment station.

Recall Schedule:

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Description of Recall Schedule: Dealers: On or before 06/12/2019

Owners: On or before 07/19/2019

Planned Dealer Notification Date : JUN 12, 2019 - JUN 12, 2019 Planned Owner Notification Date : JUL 19, 2019 - JUL 19, 2019

* NR - Not Reported