

# VOLKSWAGEN

GROUP OF AMERICA

James C. Owens, Acting Administrator  
National Highway Traffic Safety Administration  
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Washington, DC 20590

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November 20, 2020 Date

Subject: Chronology for Volkswagen Recall 69BH  
Front Seat Belts

VOLKSWAGEN GROUP OF AMERICA, INC.  
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Dear Mr. Owens:

Volkswagen hereby submits the following chronology associated with the subject recall.

## Chronology of Defect

December 2017: Two seat belt ruptures occurred at two NCAP tests conducted by NHTSA. Analysis and testing initiated.

January 10, 2018: NHTSA opened a PE regarding the two occurrences.

Beginning January 2018, Volkswagen started intensive testing in order to understand what may have caused the seat belt ruptures in the two NHTSA NCAP tests. This included a series of sled tests and full vehicle crash tests. An outside influence was considered as the most likely cause of the results in the two NHTSA NCAP tests.

July 03, 2018: NHTSA upgraded the PE to an EA. Volkswagen continued with its analysis and testing.

July 2018 - May 2020: Ongoing investigation and field monitoring showed no evidence of any problems with seat belt performance in the field or other internal testing.

June 01, 2020: Volkswagen received an IR letter from NHTSA to further investigate this topic.

July 2020 - October 2020: As part of the ongoing analysis, Volkswagen conducted additional testing (sled tests, vehicles crash tests, simulations, field parts analysis) in order to understand the results of the two NHTSA NCAP tests in 2017 and to identify potential additional contributors that may have influenced the test result in the two NCAP tests in 2017.

November 03, 2020: Volkswagen presented its findings to NHTSA.

November 11, 2020: Topic was presented to Volkswagen's Product Safety Committee. No final root cause determination could be identified. All other vehicle tests (release tests, NCAP tests, FMVSS 208 tests) for the Tiguan were successful and did not result in a seat belt rupture. No field events with a seat belt rupture are known for the Tiguan. Volkswagen believes that an outside influence most likely caused the results observed in the two NCAP tests conducted in 2017. Volkswagen could not identify a final root cause for the seat belt

ruptures but believes an outside influence may have contributed to the seat belt ruptures in the two 2017 NHTSA NCAP tests. These ruptures differ from several other NCAP-style tests run by Volkswagen in which the seat belts perform well. Nevertheless, out of an abundance of caution, and to exclude influence on the seat belt performance due to potential deviations in the production lot of the seat belts of the Tiguan vehicles tested by NHTSA NCAP, Volkswagen proposed a recall of vehicles built with seat belt assemblies out from the same seat belt production lot as the tested vehicles.

November 17, 2020: Volkswagen briefs NHTSA Office of Defect Investigations on the proposed recall. NHTSA requested meeting to discuss.

November 20, 2020: Volkswagen presented topic to NHTSA Office of Defects Investigations. Decision to proceed with the recall was made.

Please contact me if you require any additional information or have any questions related to this information.

Sincerely,

Christopher T. Sandvig  
Director, Group Customer Protection  
Group Quality