

VOLKSWAGEN

GROUP OF AMERICA

James C. Owens, Acting Administrator
National Highway Traffic Safety Administration
1200 New Jersey Avenue, S.E.
Washington, DC 20590

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March 22, 2021 Date

Subject: Chronology for Volkswagen Recall 69BY – PODS

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

June 12, 2019: The Audi Product Safety Committee makes the determination of a defect and decides a voluntary safety recall (69Z4) for A3 vehicles manufactured between late 2013 and April 2019 due to a possible issue with the Passenger occupant detection system (PODS). The root cause was identified as a widening of the plug-in contacts at the connector underneath the seat that may lead to sporadically loose contacts and incorrect electrical contacting which may cause the PODS to detect a malfunction and switch off the passenger airbag even though the seat may be occupied.

September 2019: Start of campaign 69Z4 with installation of new more robust PODS connector and optimized cable routing.

February 2020: The US market reports cases of PODS malfunctions on vehicles not included in the campaign.

March/April 2020: AUDI AG becomes aware of new complaints regarding vehicles that had undergone the 69Z4 campaign repair. Audi also identified additional complaints via NHTSA's VOQ system indicating potential issues after the campaign remedy. Audi began investigating the possible cause.

March - August 2020: Audi initiated parts collection and analysis as part of the investigation process. Process delays and interruptions occurred due to COVID-19 restrictions. Concurrently, Audi also began reviewing the remedy procedure used in 69Z4 and investigated whether technician errors may have affected the previous repairs.

September 2020 to February 2021: Continued root cause analysis for claims after campaign and for claims after change in production with frequent updates to the Audi Product Safety Committee. Analysis of all potential contributing factors, inspection of vehicles, evaluation of statistical data and detailed testing to reproduce errors and understand failure pattern. Despite intense efforts, the faults triggering the error codes, which often only occur sporadically, could not be reproduced and the root cause remains unknown.

During this time period Audi also continued to monitor the field and to collect field parts for the ongoing investigation.

March 15, 2021: Despite the unknown root cause, based on the number of claims after the previous recall, the Audi Product Safety Committee believes that an additional issue exists within the PODS system, beyond the issue addressed by campaign 69Z4. Out of an abundance of caution, it was decided to recall all Audi A3 vehicles built between 2013 and 2020 due to this topic.

Audi continues to investigate the root cause and failure pattern.

To date, Audi is unaware of any accidents or injuries related to this issue.

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