

VOLKSWAGEN

GROUP OF AMERICA

Ann Carlson, Acting Administrator
National Highway Traffic Safety Administration
1200 New Jersey Avenue, S.E.
Washington, DC 20590

Christopher T. Sandvig NAME
Director Title
Group Customer Protection Department
248-754-5000 Phone
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October 31, 2022 Date

Subject: Chronology for Volkswagen Recall Codes 45J6, 45J7, 45J8
TPMS Noncompliance

VOLKSWAGEN GROUP OF AMERICA, INC.
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AUBURN HILLS, MI 48326
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Dear Ms. Carlson:

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

Chronology of Defect

April 29, 2020: The topic was presented in Volkswagen AG and Audi AG Product Safety Committees. A recall was decided, along with a petition for inconsequential non-compliance in the United States.

May 06, 2020: Volkswagen files a 573 with the NHTSA for a potential TPMS non-compliance with FMVSS 138 - Tire pressure monitoring systems. Volkswagen states the intention of filing a petition for inconsequential non-compliance, because the issue with the TPMS system on the affected vehicles does not pose an unreasonable risk to motor vehicle safety. The behavior does not pose an unreasonable safety risk, as every puncture (meaning a rapid tire pressure loss), as well as a diffusion (meaning a long term pressure loss on multiple tires), will be detected. The pressure loss will still be detected in all cases, but in certain instances where all four tires deflate at the same rate at the same time, it may not be detected in the time specified in the FMVSS 138 test procedure. A pressure loss on less than four tires at the same time and rate will be detected and indicated to the driver. Warning for the driver will still occur in all cases before a potential safety-relevant tire pressure is reached.

May 20, 2020: VWGoA files the petition for inconsequential non-compliance with the NHTSA.

June 08, 2020: VWGoA files an amended petition for inconsequential non-compliance with the NHTSA to correct model year and production dates listed in the original inconsequential non-compliance petition.

October 21, 2022: NHTSA informs VWGoA that they have denied the petition for inconsequential noncompliance.

October 24, 2022: NHTSA publishes their decision in the Federal Register. The agency decided that Volkswagen has not met its burden of persuasion that the subject FMVSS No. 138 noncompliance is inconsequential to motor vehicle safety. Accordingly, Volkswagen's petition was denied, and Volkswagen is consequently obligated to provide notification of and free remedy for that noncompliance under 49 U.S.C. 30118 and 30120.

Neither Volkswagen nor Audi are aware of any warranty claims or field reports related to this topic.

Neither Volkswagen nor Audi is aware of any incidents or injuries related to this topic.

Unrepaired vehicles that were previously reported under recall codes: (Audi 45i3 / VW 45i4 / VW 45i6) are being moved into the following new codes: (Audi 45J7 / VW 45J6 / VW 45J8)

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

Sincerely,

A handwritten signature in blue ink, appearing to read 'C.T.S.', is positioned above the printed name.

Christopher T. Sandvig
Director, Group Customer Protection
Group Quality