VOLKSWAGEN

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October 15, 2003

Thomas Z. Cooper, Chief
Office of Defects Investigation
US Department of Transportation
National Highway Traffic Safety Administration
400 Seventh Street, S.W.
Washington, DC 20590

Subject: EA03-013

Dear Mr. Cooper,

Attached is our response to your letter dated September 2, 2003 requesting additional information concerning fan blade separation from the engine's electronic cooling fan for 1996 through 2003 model year Volkswagen EuroVan and Winnebago Rialta vehicles.

For your convenience, each request is restated verbatim and then followed by our response.

As you will see in the responses, Volkswagen AG and Siemens-VDO are engaged in a comprehensive testing and evaluation program. Based on the results to date, neither Volkswagen AG nor Siemens-VDO has been able to identify the existence of a defect in the cooling fans in question. Similarly, no final identification of the root cause for alleged fan blade separations has been made. Volkswagen AG and Siemens-VDO are continuing with their testing program. We will be contacting you to schedule a meeting to discuss the findings of our analysis upon the conclusion of the testing.

We are submitting additional documents with a request for confidentiality to your Chief Counsel.

If you have any questions or require additional information please contact me.

Regards,

John Maddox
Compliance Officer
VWoA

Encl. CD ROM: Data Collection Disc

1. State, by model and model year, the number of subject vehicles VW has manufactured for sale or lease in the United States that were not provided under PE03-015. Separately, for each subject vehicle manufactured to date by VW, state the following:

   a. Vehicle Identification number (VIN);
   b. Make;
   c. Model;
   d. Model Year;
   e. Date of manufacture;
   f. Date warranty coverage commenced; and
   g. The State in the United States where the vehicle was originally sold or leased (or delivered for sale or lease).

   Provide the table in Microsoft Access 2000, or a compatible format, entitled "PRODUCTION DATA." See Enclosure 1, Data Collection Disc, for a pre-formatted table, which provides further details regarding this submission.

Response 1.

In response to this inquiry, VW has not produced any Eurovan vehicles other than those provided in our response to PE03-015. VW has updated the "*PRODUCTION DATA.xls*" table provided with PE03-015 to include make and model information. Warranty Start Date information for vehicles sold after our response to PE03-015 has also been updated. This table is attached hereto as Exhibit to Question 1.

Source, Date Gathered:
Vehicle Population Universe, Sept. 8, 2003

Exhibit to Question 1

PRODUCTION DATA

Data is provided in Microsoft Excel format on EA03-013 Data Collection Disc

2. State the number of each of the following, received by VW, or of which VW are otherwise aware, which relate to, or may relate to, the alleged defect in the subject vehicles that were not provided under PE03-015:

   a. Consumer complaints, including those from fleet operators;
   b. Field reports, including dealer field reports;
   c. Reports involving a crash, injury, or fatality, based on claims against the manufacturer involving a death or injury, notices received by the manufacturer alleging or proving that a death or injury was caused by a possible defect in a subject vehicle, property damage claims, consumer complaints, or field reports;
   d. Reports involving a fire, based on claims against the manufacturer involving a death or injury, notices received by the manufacturer alleging or proving that a death or injury was caused by a possible defect in a subject vehicle, property damage claims, consumer complaints, or field reports;
   e. Property damage claims; and
   f. Third-party arbitration proceedings where VW is or was a party to the arbitration; and
   g. Lawsuits, both pending and closed, in which VW is or was a defendant or codefendant.

   For subparts "a" through e," state the total number of each item (e.g., consumer complaints, field reports, etc.) separately. Multiple incidents involving the same vehicle are to be counted separately. Multiple reports of the same incident are also to be counted separately (i.e., a consumer complaint and a field report involving the same incident in which a crash occurred are to be counted as a crash report, a field report and a consumer complaint).

   In addition, for items "c" through "g," provide a summary description of the alleged problem and causal and contributing factors and VW's assessment of the problem, with a summary of the significant underlying facts and evidence. For items f and g, identify the parties to the action, as well as the caption, court, docket number, and date on which the complaint or other document initiating the action was filed.

Response 2.

   a. **In response to this inquiry, VW has identified 5 Winnebago Rialta and 1 Volkswagen Eurovan consumer complaints related to the alleged defect in the subject vehicles since our response to PE03-015; none from fleet operators.**
   b. **In response to this inquiry, VW has identified 2 Winnebago Rialta field reports related to the alleged defect in the subject vehicles since our response to PE03-015, including dealer field reports.**
   c. **In response to this inquiry, VW has not identified any reports related to the alleged defect in the subject vehicles involving a crash, injury, or fatality, based on claims against the manufacturer involving a death or injury, notices received by the manufacturer alleging or proving that a death or injury was caused by a possible defect in a subject vehicle, property damage claims, consumer complaints, or field reports.**
   d. **In response to this inquiry, VW has not identified any reports related to the alleged defect in the subject vehicles involving a fire, based on claims against the manufacturer involving a death or injury, notices received by the manufacturer alleging or proving that a death or injury was caused by a possible defect in a subject vehicle, property damage claims, consumer complaints, or field reports.**

e. **In response to this inquiry, VW has not identified any property damage claims related to the alleged defect in the subject vehicles.**
f. **In response to this inquiry, VW has not identified any third-party arbitration proceedings related to the alleged defect in the subject vehicles, where VW is or was a party to the arbitration.**
g. **In response to this inquiry, VW has not identified any lawsuits, both pending and closed related to the alleged defect in the subject vehicles, in which VW is or was a defendant or codefendant.**

Source, Date Gathered:
a) CR Listen Database, Data up to date of inquiry
b) Product Support, Data up to date of inquiry
c-g) Product Liaison, Sept 16, 2003

3. Separately, for each item (complaint, report, claim, notice, or matter) within the scope of your response to Request No. 2, state the following information:

   a. VW's file number or other identifier used;
   b. The category of the item, as identified in Request No. 2 (i.e., consumer complaint, field report, etc.);
   c. Vehicle owner or fleet name (and fleet contact person), address, and telephone number;
   d. Vehicle's VIN;
   e. Vehicle's make, model and model year;
   f. Vehicle's mileage at time of incident;
   g. Incident date;
   h. The state in which the incident occurred;
   i. Report or claim date;
   j. Whether a crash is alleged;
   k. Whether a fire is alleged;
   l. Whether property damage is alleged;
   m. Number of alleged injuries, if any; and
   n. Number of alleged fatalities, if any.

   Provide this information in Microsoft Access 2000, or a compatible format, entitled "REQUEST NUMBER TWO DATA." See Enclosure 1, Data Collection Disc, for a pre-formatted table which provides further details regarding this submission.

Response 3.

Our responses to subparagraphs a. through n. are provided in a Microsoft Excel table entitled "*REQUEST NUMBER TWO DATA.xls*" attached hereto as Exhibit to Question 3.

This information is sorted by report category, by VIN.

Exhibit to Question 3

REQUEST NUMBER TWO DATA

Data is provided in Microsoft Excel format on EA03-013 Data Collection Disc

4. Produce copies of all documents related to each item within the scope of Request No. 2. Organize the documents separately by category (i.e., consumer complaints, field reports, etc.) and describe the method VW used for organizing the documents.

Response 4.

Our responses to subparagraphs a. through g. are provided in an Adobe Acrobat file entitled "*REQUEST NUMBER FOUR DATA.pdf*" attached hereto as Exhibit to Question 4.

This information is sorted by report category, by VIN.

Exhibit to Question 4

REQUEST NUMBER FOUR DATA

Data is provided in Adobe Acrobat format on EA03-013 Data Collection Disc

5. State, by model and model year, a total count for all of the following categories of claims, collectively, that have been paid by VW to date that relate to, or may relate to, the alleged defect in the subject vehicles: warranty claims; extended warranty claims; claims for good will services that were provided; field, zone, or similar adjustments and reimbursements; and warranty claims or repairs made in accordance with a procedure specified in a technical service bulletin or customer satisfaction campaign that were not provided under PE03-016. Separately, for each such claim, state the following information:

   a. VW's claim number;
   b. Vehicle owner or fleet name (and fleet contact person) and telephone number;
   c. VIN;
   d. Repair date;
   e. Vehicle mileage at time of repair;
   f. Repairing dealer's or facility's name, telephone number, city and state or ZIP code;
   g. Labor operation number;
   h. Problem code;
   i. Replacement part number(s) and description(s);
   j. Concern stated by customer; and
   k. Comment, if any, by dealer/technician relating to claim and/or repair.

   Provide this information in Microsoft Access 2000, or a compatible format, entitled "WARRANTY DATA." See Enclosure 1, Data Collection Disc, for a pre-formatted table which provides further details regarding this submission.

Response 5:

In response to this inquiry, VW has identified the following claims relating to the alleged defect in the subject vehicles since our response to PE03-016:

Model	Model Year	Count
Winnebago	1999	3
	2002	5
EuroVan	1998	1
	1999	1
	2001	1

Source, Date Gathered:
Warranty Claims Universe, Data up to date of inquiry

Our responses to subparagraphs a. through k. are provided in a Microsoft Excel table entitled *"WARRANTY DATA.xls"* attached hereto as Exhibit to Question 5.

Exhibit to Question 5

WARRANTY DATA

Data is provided in Microsoft Excel format on EA03-013 Data Collection Disc

6. Produce copies of all service, warranty, and other documents that relate to, or may relate to, the alleged defect in the subject vehicles, that VW has issued to any dealers, regional or zone offices, field offices, fleet purchasers, or other entities. This includes, but is not limited to, bulletins, advisories, informational documents, training documents, or other documents or communications, with the exception of standard shop manuals. Also include the latest draft copy of any communication that VW is planning to issue within the next 120 days.

Response 6:

In response to this inquiry, VW has not identified any communications relating to the alleged defect in the subject vehicles since our response to PE03-015.

7. VW's response to question number eight, (assessments, analyses, tests, etc.) of ODI's May 1, 2003 letter indicates VW conducted three separate actions. For Action II: Analysis of 1 Broken Fan, provide all information relative to the following:

   a. VW's response stated: "The results show the cause of the broken fan blade is a direct result of a forced rupture of the fan hood." Explain in detail what VW means by forced rupture of the fan hood.
   b. Identify all factors that VW considered in it's analysis that the cause of the broken blade was a "direct result of a forced rupture of the fan hood."
   c. All documents relating to the Action II analysis. *(Include e-mail communication)*

Response 7:

   a. The statement was based on photographs of a damaged fan blade that were made available to Volkswagen. In our experience, the available photographs led us to the conclusion that the damage was caused by previous crash-like external influences.
   b. Through study of the photographs, it is apparent that the fan hub and the radiator have come into contact due to a previous crash-like external influence. We conclude the blade separation is due to that external influence.
   c. VW has not identified any documents relating to this action, other than the photographs themselves, which were provided under PE03-015. VW has not inspected these parts and the parts are no longer available for analysis.

8. VW's response to question number eight, (assessments, analyses, tests, etc.) of ODI's May 1, 2003 letter indicates VW conducted three separate actions. For Action III: Running Analysis, expected to be completed by week 27 of 2003, provide all information relative to the following:

   a. The results of the analysis.
   b. Copies of the reports for the vehicles identified by VIN numbers WV3AB47062H032660 and VW3AB47042H031121.
   c. All documents relating to the Action III analysis. *(Include e-mail communication)*

Response 8:

   a. The results of the analysis are as follows: The material met specifications. All three damaged parts showed the same fracture pattern. The strength of the material at the knit lines on one of the cooling fans examined was lower than comparable measurements on unused parts manufactured in March 2003.
   b. VW is providing copies of reports from the parts analysis from these two vehicles. VW did not inspect these two vehicles.
   The following document will be submitted to NHTSA's Chief Counsel with a request for

confidentiality as per 49 CFR 512 (2003). Our supplier, Siemens VDO will be submitting additional documents related to this response directly to NHTSA's Chief Counsel with a request for confidentiality.

Attachment 8-1: Laboratory report # 203100

c. **In response to your inquiry, VW has not identified any further documents related to Action III.**

9. ODI notes that the 1999 and 2000 model year Winnebago Rialta makes up just 25 percent of the subject vehicle population but account for 95 percent of the reports. And, the 1999 and 2000 model year Eurovan makes up just 14 percent of the 1993 through 2003 Eurovan population but account for 67 percent of the reports.

   a. What is VW's assessment of the high number of reported fan blade failures for the 1999 and 2000 model years?
   b. What is VW's assessment as to the over involvement in the Winnebago Rialta vehicles?
   c. What is VW's assessment of the sudden rise in reports beginning in the 1999 model year and the dramatic drop in reports after the 2000 model year?

Response 9:

Volkswagen AG and Siemens-VDO are engaged in a comprehensive testing and evaluation program. Based on the results to date, neither Volkswagen AG nor Siemens-VDO has been able to identify the existence of a defect in the cooling fans in question. Similarly, no final identification of the root cause for alleged fan blade separations has been made. Volkswagen AG and Siemens-VDO are continuing with their testing program.