

# VOLKSWAGEN of America, Inc.

Product Compliance  
3800 Hamlin Road  
Auburn Hills, MI 48326  
Phone: 1 (248) 754-5000  
Fax: 1 (248) 754-5093

October 19, 2007

Ms. Patricia Wallace  
Recall Analyst for Safety Assurance  
National Highway Traffic Safety Administration  
Attn: Recall Management Division (NVS-215)  
U.S. Department of Transportation  
1200 New Jersey Avenue, S.E.  
Washington, DC 20590

**Subject: Compliance Recall Campaign Q8 (07V-442)**

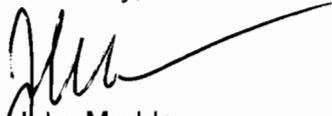
Dear Ms. Wallace:

Pursuant to the requirements set forth in Part 573.6 of Title 49 of the Code of Federal Regulations, we are submitting three (3) copies of the following communications for compliance recall campaign Q8 (07V-422):

- Dealer Notification
- Customer Notification
- Work Procedure
- Accounting Procedure
- FAQ

If you have any questions or require additional information please contact Chris Sandvig at 248-754-5563 or Maria Cotter at (248) 754-4856.

Sincerely,



John Maddox  
Product Compliance Officer

Enclosures

07  
07-11-2007 10:10



## VOLKSWAGEN DEALERSHIP COMMUNICATION

To: Dealer Principal, Service Manager, Parts Manager and  
Warranty Administrator

Name

Title

Subject: Compliance Recall Q8  
Headlamp Inspection/Modification

Product Compliance Department

October 2007 Date

### IMPORTANT NOTICE TO DEALERS - FOR IMMEDIATE DISTRIBUTION Compliance Recall Q8

This is to inform you that Volkswagen is releasing Compliance Recall Q8 for some 2005-2008 Jetta and 2006-2008 Rabbit/GTI/R32 vehicles in the United States, and for some 2006-2008 Jetta and 2007-2008 Rabbit/GTI vehicles in Canada.

- The Q8 code and campaign circular will be visible in ElsaWeb on or before October 22, 2007. If you have **any** questions concerning vehicle eligibility for this campaign, please contact the Campaign Helpline at 1-800-741-2919.
- Each dealer with affected vehicles should have already received an allocation of parts for this action. Begin using these parts to repair **in-stock (unsold) vehicles prior to their retail sale or lease**. You can also use this allocation to repair customer vehicles, should a customer demand this repair.
- Owner notification will begin on or about October 31, 2007. Allocations lists will be sent to dealers in the Service Manager's package on or about October 25, 2007.

#### Important Reminder on Vehicles Affected by Safety and Compliance Recalls

Federal law prohibits any person from knowingly selling, or offering for sale, any motor vehicle that either contains a defect related to motor vehicle safety or does not comply with applicable motor vehicle safety standards. Immediately upon completion of the repair, enter the claim into the system. Claims will only be paid for vehicles that show Compliance Recall Q8 open in ElsaWeb on the day of the repair.

#### What is the Problem?

The headlamps on affected vehicles may have missing or misplaced caps on certain aiming adjustments as follows:

- *Low beam horizontal aiming*: Some of the affected vehicles may not have had a required cap installed in production to disable the headlight horizontal aim as required by Federal regulation.
- *Vertical aiming*: Some of the affected vehicles may contain a cap that disables the vertical aiming screw, which does not comply with Federal regulation.
- *Vertical aiming of low beam relative to the high beam (diagonal)*: All of the affected vehicles contain an adjustment mechanism that allows aiming of the low beam relative to the high beam, which does not comply with Federal regulation if not disabled by a cap.

Since these items are required by Federal regulation, a noncompliance with Federal Motor Vehicle Safety Standard (FMVSS) 108 in the United States and Technical Standards Document (TSD) No. 108 in Canada exists if they are missing or misplaced on a headlamp.

#### IMPORTANT!

To ensure that ALL of your personnel are aware of this recall before receiving questions from any customer, please share this information with ALL personnel who have campaign-related responsibilities, including service writers, technicians, parts employees, warranty administrators, etc.

## What Will Volkswagen Do?

Dealers will inspect the headlamps on affected vehicles and make modifications as follows (if necessary):

- *Low beam horizontal aiming:* Affected vehicles will be inspected for the presence of a cap in the socket of the low beam horizontal aiming screw. If the cap is missing, one will be installed.
- *Vertical aiming:* Affected vehicles will be inspected for the presence of a cap in the socket of the vertical aiming screw and, if present, the cap will be removed.
- *Vertical aiming of low beam relative to the high beam:* The adjustment mechanism will be disabled by capping the socket.

Dealers with additional questions about this or any other campaign should contact the Campaign Helpline (800-741-2919) for assistance.

## Volkswagen Product Compliance

**IMPORTANT!**

To ensure that ALL of your personnel are aware of this recall before receiving questions from any customer, please share this information with ALL personnel who have campaign-related responsibilities, including service writers, technicians, parts employees, warranty administrators, etc.

**IMPORTANT INFORMATION**

Please inform and provide a copy of this document to every person in your dealership with campaign-related responsibilities, including Service, Parts and Accounting personnel. By law, dealers must correct, prior to delivery for sale or lease, any vehicle that fails to comply with an applicable Federal Motor Vehicle Safety Standard or that contains a defect relating to motor vehicle safety. **If you have questions regarding this or any other campaign, please call (800) 741-2919.**



# Compliance Recall Circular

WIN Code: **Q8**

Subject: **2005-2008 Jetta, 2006-2008 Rabbit/GTI/R32**

SAGA Code: **94D2**

**Headlamp Inspection/Modification**

October 2007

## Problem Description

The headlamps on affected vehicles may have missing or misplaced caps on certain aiming adjustments as follows:

- *Low beam horizontal aiming:* Some affected vehicles may not have had a required cap installed in production to disable the headlight horizontal aim as required by Federal regulation.
- *Vertical aiming:* Some affected vehicles may contain a cap that disables the vertical aiming screw, which does not comply with Federal regulation.
- *Vertical aiming of low beam relative to the high beam (diagonal):* All affected vehicles contain an adjustment mechanism that allows aiming of the low beam relative to the high beam, which does not comply with Federal regulation if not disabled by a cap.

Since these items are required by Federal law, a noncompliance exists if they are missing or misplaced on a headlamp.

## Corrective Action

Inspect headlamps and make modifications as necessary:

- *Low beam horizontal aiming:* Inspect for the presence of a cap in the socket of the low beam horizontal aiming screw. Install cap if missing.
- *Vertical aiming:* Inspect for the presence of a cap in the socket of the vertical aiming screw. Remove cap if present.
- *Vertical aiming of low beam relative to the high beam (diagonal):* Disable adjustment mechanism.

## VIN Ranges & Production Dates of Affected Vehicles

### U.S.A.

#### 2005-2008 Jetta

3VV\_1K\_5M600049 – 3VV\_1K\_8M047920

Production date : October 18, 2004 – September 21, 2007

#### 2006-2008 Rabbit/GTI/R32

WVW\_1K\_6W053881 – WVW\_1K\_8W114148

Production date : October 31, 2005 – September 27, 2007

## Canada

#### 2006-2008 Jetta

3VV\_1K\_6M000660 – 3VV\_1K\_8M047875

Production date : June 28, 2006 – September 21, 2007

#### 2007-2008 Rabbit/GTI

WVW\_1K\_7W000065 – WVW\_1K\_8W110867

Production date : January 03, 2006 – September 25, 2007

**NOTE:** Check *ElsaWeb* on the day of repair to verify vehicle eligibility and attach the screen print to the repair order. This is the only valid campaign inquiry and verification source. Some vehicles may be involved in an additional action(s); any additional work can be done while the vehicle is in for this action.

## Allocation Report of Affected Vehicles

Before owner notification begins, dealers with affected vehicles will receive a report (in the Service Manager's package) containing the VIN, customer name and address data for affected vehicles. Dealers will not receive a report if they have no affected vehicles.

**NOTE:** The allocation report contains owner names and addresses obtained from Motor Vehicle Registration Records. By law, this data may only be used for recall purposes. Use for any other reason may be a violation of law in many states/provinces. Accordingly, you must limit the use of this report.

## Parts Information and Allocation

You have received a parts allocation for your affected in-stock vehicles. A subsequent allocation will be provided prior to owner notification mailing. Upper order limits are currently in place.

## Owner Notification Mailing

Beginning October 31, 2007 Volkswagen will notify all known owners of affected vehicles by first class mail. A sample copy of the owner letter is enclosed.

**Claim Entry Procedure**

Immediately upon completion of the repair work, enter the correct code listed below. Claims will only be paid for vehicles that show this campaign open in ElsaWeb on the day of the repair. To help ensure prompt and proper payment, attach the screen print to the repair order.

<b>Q8 WIN Claim Entry Procedure</b>		
<b>Damage Time</b>		
<b>Code</b>	<b>Units</b>	<b>Work Scope</b>
<b>Q8 11</b>	<b>10 T.U.</b>	- Inspect headlamps; NO further work required
		<b><u>Xenon Headlamps</u></b>
<b>Q8 12</b>	<b>10 T.U.</b>	- Inspect headlamps; Install caps onto horizontal and diagonal adjusters 2 4E0 941 041 Cap 2 000 941 041A Plastic cover
		<b><u>Halogen Headlamps</u></b>
<b>Q8 13</b>	<b>10 T.U.</b>	- Inspect headlamps; Install caps onto horizontal adjusters; Install covers onto diagonal adjusters 2 4E0 941 041 Cap 2 000 941 041 Plastic cover
<b>Q8 20</b>	<b>0 T.U.</b>	- Customer refused repairs
<b><i>There is NO reimbursement for Vehicle Wash or Loaner Vehicle</i></b>		
<b><i>The system will enter parts and labor applicable to the codes above</i></b>		

## Q8 Saga Claim Entry Procedure

Check in the system Service-Online, FISH (VSI), to determine whether the "94D2" campaign is open.

Service No.: 94D2

Damage Code: 0099

**Parts Manufacturer – Removed part:** Please use the vendor code from the removed part. If no vendor code is available, then *use K21*

Sold vehicle = 7 10

Unsold vehicle = 7 90

### **Accounting Instructions**

#### **Criteria 01**

Inspect headlamps; NO further work required

**Repair operation: 0183 00 99** **10 T.U.**

**OR**

#### **Xenon Headlamps**

Inspect headlamps; Install caps onto horizontal & diagonal adjusters

**Repair operation: 9415 36 99** **10 T.U.**

2 4E0 941 041 Cap  
2 000 941 041A Plastic cover

**OR**

#### **Halogen Headlamps**

Inspect headlamps; Install caps onto horizontal adjusters;  
Install covers onto diagonal adjusters

**Repair operation: 9415 36 99** **10 T.U.**

2 4E0 941 041 Cap  
2 000 941 041 Plastic cover

***There is NO reimbursement for Vehicle Wash or Loaner Vehicle!***

#### **If Customer refused repairs**

Fax the Repair Order to VWoA at (248) 754-5093 and provide VIN, applicable Service Number, Customer Information, Dealer Number and Date

## Customer Letter Example (U.S.A.)

October 2007

**Subject: Compliance Recall Q8  
2005-2008 Jetta, 2006-2008 Rabbit/GTI/R32  
Headlamp Inspection/Modification**

Dear Volkswagen Owner:

This notice is sent to you in accordance with the requirements of the National Traffic and Motor Vehicle Safety Act.

Volkswagen has decided that the headlamps in some 2005-2008 Jetta and 2006-2008 Rabbit/GTI/R32 vehicles fail to fully conform to Federal Motor Vehicle Safety Standard No. 108 – Lamps, Reflective Devices, and Associated Equipment. Our records show that you are the owner of one of these vehicles.

### What Is The Problem?

Some vehicles may have missing or misplaced caps on certain aiming adjustments as follows:

- *Low beam horizontal aiming:* Some affected vehicles may not have had a required cap installed in production to disable the headlight horizontal aim as required by law.
- *Vertical aiming:* Some affected vehicles may contain a cap that disables the vertical aiming screw, which does not comply with Federal law.
- *Vertical aiming of low beam relative to the high beam (diagonal):* All affected vehicles contain an adjustment mechanism that allows aiming of the low beam relative to the high beam, which does not comply with Federal law if not disabled by a cap.

Since these items are required by Federal law, non-compliance exists if they are missing or misplaced. Non-compliance can inhibit proper headlamp aim adjustment for roadway illumination. Improperly aimed headlamps could cause reduced road visibility, increasing the risk of a crash.

### What Will Volkswagen Do?

In order to identify and correct this noncompliance, dealers will inspect the headlamps on your vehicle and make modifications if necessary:

- *Low beam horizontal aiming:* Inspect for the presence of a cap in the socket of the low beam horizontal aiming screw. Install cap if missing.
- *Vertical aiming:* Inspect for the presence of a cap in the socket of the vertical aiming screw. Remove cap if present.
- *Vertical aiming of low beam relative to the high beam (diagonal):* Disable adjustment mechanism.

### What We Would Like You to Do

Please contact your authorized Volkswagen dealer and arrange for an appointment without delay. This service will take just a few minutes and will be free of charge. Please keep in mind that your dealer may need additional time for the preparation of the repair, as well as to accommodate their daily workshop schedule.

### Lease Vehicles

If you are the lessor and registered owner of the vehicle identified in this action, the law requires you to forward this information immediately via first-class mail to the lessee within ten (10) days of receipt of this notification.

### Have You Changed Your Address Or Sold The Vehicle?

If you have, please fill out the enclosed prepaid Owner Reply card and mail it to us so we can update our records.

### Service Help from Us

If your authorized Volkswagen dealer fails or is unable to complete this work free of charge within a reasonable time, please call or write to:

Volkswagen of America, Inc.  
**Attn: Customer CARE Center – Hills East (Q8)**  
3499 West Hamlin Road  
Rochester Hills, MI 48309  
1-800-893-5298

If you still cannot obtain satisfaction, you may file a complaint with: The Administrator, National Highway Traffic Safety Administration, 1200 New Jersey Ave., S.E., Washington, DC 20590; or call the toll-free Vehicle Safety Hotline at 1-888-327-4236 (TTY: 1-800-424-9153); or go to <http://www.safercar.gov>.

We apologize for any inconvenience this matter may cause; however we are taking this action to help ensure your safety and continued satisfaction with your vehicle. Thank you for driving a Volkswagen!

Sincerely,

Volkswagen Product Compliance

## Customer Letter Example (CANADA)

October 2007

**Subject: Compliance Recall Q8  
2006-2008 Jetta, 2007-2008 Rabbit/GTI  
Headlamp Inspection/Modification**

Dear Volkswagen Owner:

This notice is sent to you in accordance with the requirements of the National Traffic and Motor Vehicle Safety Act.

Volkswagen has decided that the headlamps in some 2006-2008 Jetta and 2007-2008 Rabbit/GTI vehicles fail to fully conform to Technical Standards Document (TSD) No. 108 - Lamps, Reflective Devices and Associated Equipment. Our records show that you are the owner of one of these vehicles.

### What Is The Problem?

Some vehicles may have missing or misplaced caps on certain aiming/adjustments as follows:

- *Low beam horizontal aiming:* Some affected vehicles may not have had a required cap installed in production to disable the headlight horizontal aim as required by law.
- *Vertical aiming:* Some affected vehicles may contain a cap that disables the vertical aiming screw, which does not comply with Federal law.
- *Vertical aiming of low beam relative to the high beam (diagonal):* All affected vehicles contain an adjustment mechanism that allows aiming of the low beam relative to the high beam, which does not comply with Federal law if not disabled by a cap.

Since these items are required by Federal law, non-compliance exists if they are missing or misplaced. Non-compliance can inhibit proper headlamp aim adjustment for roadway illumination. Improperly aimed headlamps could cause reduced road visibility, increasing the risk of a crash.

### What Will Volkswagen Do?

In order to identify and correct this noncompliance, dealers will inspect the headlamps on your vehicle and make modifications if necessary:

- *Low beam horizontal aiming:* Inspect for the presence of a cap in the socket of the low beam horizontal aiming screw. Install cap if missing.
- *Vertical aiming:* Inspect for the presence of a cap in the socket of the vertical aiming screw. Remove cap if present.
- *Vertical aiming of low beam relative to the high beam (diagonal):* Disable adjustment mechanism.

### What We Would Like You to Do

Please contact your authorized Volkswagen dealer and arrange for an appointment without delay. This service will take just a few minutes and will be free of charge. Please keep in mind that your dealer may need additional time for the preparation of the repair, as well as to accommodate their daily workshop schedule.

### Lease Vehicles

If you are the lessor and registered owner of the vehicle identified in this action, the law requires you to forward this information immediately via first-class mail to the lessee within ten (10) days of receipt of this notification.

### Have You Changed Your Address Or Sold The Vehicle?

If you have, please fill out the enclosed prepaid Owner Reply card and mail it to us so we can update our records.

### Service Help from Us

If your authorized Volkswagen dealer fails or is unable to complete this work free of charge within a reasonable time, please call or write to:

Volkswagen Canada Inc.  
**Attn: Customer CARE Center (Q8)**  
P.O. Box 842, Stn. A  
Windsor, ON N9A 9Z9  
1-800-893-5298

We apologize for any inconvenience this matter may cause; however we are taking this action to help ensure your safety and continued satisfaction with your vehicle. Thank you for driving a Volkswagen!

Sincerely,

Volkswagen Product Compliance

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The information in this document is intended for use only by skilled technicians who have the proper tools, equipment and training to correctly and safely maintain your vehicle. These procedures are not intended to be attempted by "do-it-yourselfers," and you should not assume this document applies to your vehicle, or that your vehicle has the condition described. To determine whether this information applies, contact an authorized Volkswagen dealer. ©2007 Volkswagen of America, Inc. and Volkswagen Canada Inc. All Rights Reserved.

## Campaign Work Procedure

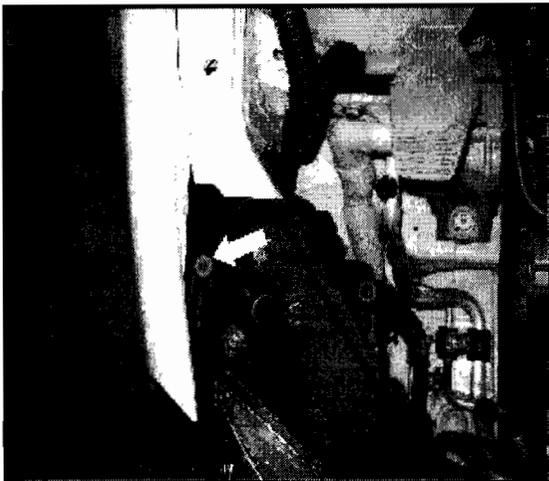
## Q8 Compliance Recall

If there are questions regarding the work procedure, contact the Campaign Helpline at 1-800-741-2919.

### Parts

Quantity	Part Number	Description
2	4E0 941 041	Cap (Halogen/ Xenon headlamp)
2	000 941 041	Plastic cover (Halogen headlamp)
2	000 941 041A	Plastic cover (Xenon headlamp)

### Work Sequence

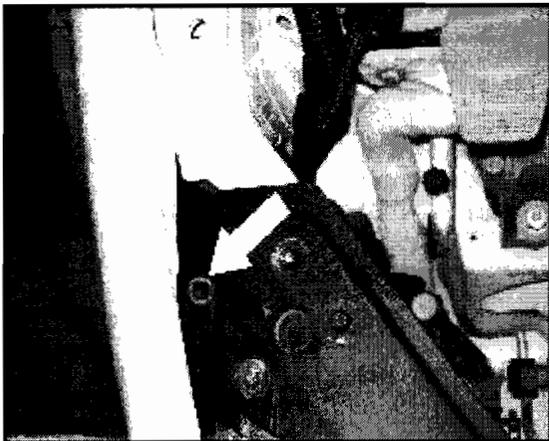


- Switch all electrical consumers off
- Open hood

#### Section A – Inspect Headlamp for Cap – Horizontal Adjuster (Halogen and Xenon Headlamps)

- Locate either headlamp on vehicle
- Visually inspect the horizontal headlamp adjuster by looking between the fender and headlamp bucket (as shown here) -arrow-

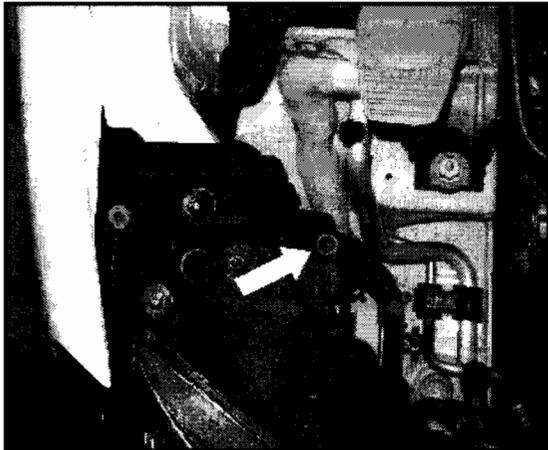
 Note: Cap may be black or white



- If cap is present on horizontal headlamp adjuster, **proceed to Section B**

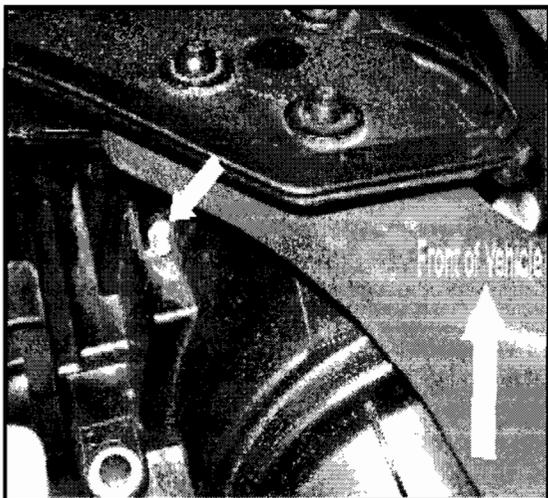
⇐ Install cap (4E0 941 041) into adjuster hole -arrow- and press firmly to ensure proper seating, **proceed to Section B**

 Note: Cap may be black or white



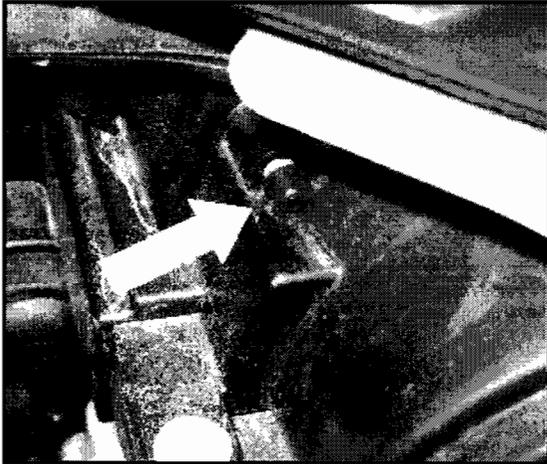
### Section B - Inspect Headlamp For Incorrect Cap Position – Vertical Adjuster (Halogen and Xenon Headlamps)

- ⇐ If cap is present on headlamp vertical adjuster -arrow-, punch hole in cap and remove cap using needle nose pliers
- If cap is not present on headlamp vertical adjuster -arrow-, **proceed to Section C for Xenon headlamps or Section D for Halogen headlamps**



### Section C - Inspect For Covered Diagonal Adjuster (XENON Headlamps Only)

- ⇐ If headlamp diagonal adjuster on back of headlamp -arrow- is not covered, install plastic cover

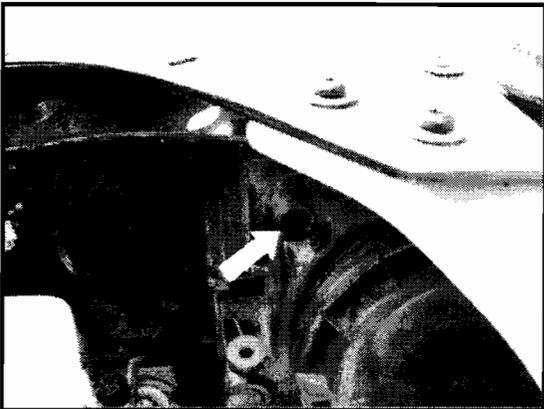


⇐ Install plastic cover (000 941 041A) onto adjuster and press firmly -arrow-; **no further work required**

⇐ If headlamp diagonal adjuster on back of headlamp is already covered, **no further work required**

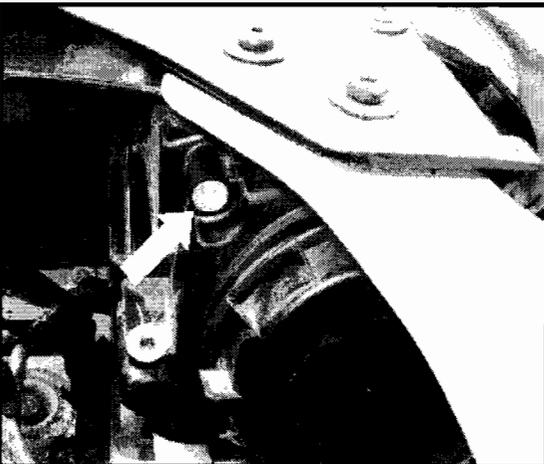
- Repeat procedure on other headlamp

**Work is complete for XENON headlamps only**



#### **Section D - Inspect For Covered Diagonal Adjuster (HALOGEN Headlamps Only)**

⇐ If headlamp diagonal adjuster on back of headlamp is not covered -arrow-, install plastic cover



⇐ Install plastic cover (000 941 041) on rearward facing headlamp adjuster -arrow-

- Repeat procedure on other headlamp

**ALL WORK IS COMPLETE**

## Frequently Asked Questions (FAQ) Compliance Recall Q8

This FAQ is intended to provide supplementary information regarding this campaign. For additional information, please refer to the campaign circular that will be posted on ElsaWeb and on ServiceNet.

### ■ What vehicles are affected?

USA - 2005-2008 model year Jetta and 2006-2008 model year Rabbit/GTI/R32 vehicles.  
Canada - 2006-2008 model year Jetta and 2007-2008 model year Rabbit/GTI vehicles.

### ■ How many vehicles are affected?

Approximately 340,000 in the United States, approximately 50,000 in Canada.

### ■ What is the problem and what can happen?

Due to an error in the production process, the headlamps on affected vehicles may have missing or misplaced caps on certain aiming/adjustments as follows:

- *Low beam horizontal aiming:* Some of the affected vehicles may not have had a cap installed in production to disable the headlight horizontal aim as required by Federal regulation.
- *Vertical aiming:* Some of the affected vehicles may contain a cap that disables the vertical aiming screw, which does not comply with Federal regulation.
- *Vertical aiming of low beam relative to the high beam:* All of the affected vehicles contain an adjustment mechanism that allows aiming of the low beam relative to the high beam, which does not comply with Federal regulation if not disabled by a cap.

Since these items are required by Federal regulation, a noncompliance with Federal motor vehicle safety standard (FMVSS) 108 exists if they are missing or misplaced on a headlamp.

### ■ Can I drive the vehicle until it is repaired?

Affected vehicles can continue to be driven as usual. However, because the potential exists for a noncompliance, consumers are urged to contact an authorized Volkswagen dealer to make an appointment for service without delay.

### ■ What exactly will be repaired on the vehicle?

Dealers will inspect the headlamps on affected vehicles and make modifications as follows (if necessary):

- *Low beam horizontal aiming:* Affected vehicles will be inspected for the presence of a cap in the socket of the low beam horizontal aiming screw. If the cap is missing, one will be installed.
- *Vertical aiming:* Affected vehicles will be inspected for the presence of a cap in the socket of the vertical aiming screw and, if present, the cap will be removed.
- *Vertical aiming of low beam relative to the high beam:* The adjustment mechanism will be disabled by plugging the socket.

### ■ How long does the repair take?

The inspection and repair will take just a few minutes to complete; however, dealers may need additional time for the preparation of the repair, as well as to accommodate their daily workshop schedule.

### ■ Is a loaner vehicle or towing being covered under this action?

Neither a loaner vehicle nor towing is being covered under this action.

■ **Do I have to make an appointment?**

Yes, after you receive a letter confirming that you are the owner of an affected vehicle and parts are available.

■ **When will this repair be available?**

In September, dealers were shipped an initial supply of parts. Additional supplies will be sent on or about October 15, 2007. The owner notification is scheduled for October 31, 2007.