

*Handwritten:* 11/19/07

**VOLKSWAGEN of America, Inc.**

Product Compliance  
3800 Hamlin Road  
Auburn Hills, MI 48326  
Phone: 1 (248) 754-5000  
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November 1, 2007

Kathleen Demeter  
Director, Office of Defects Investigation  
US Department of Transportation  
National Highway Traffic Safety Administration  
1200 New Jersey Ave, S.E.  
Washington, DC 20590

Subject: RQ07-002 NVS-212-jfa; Electronic Cooling Fan

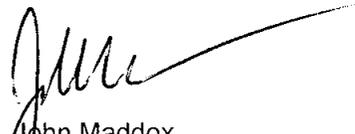
Dear Ms. Demeter,

Attached is our response to your letter dated September 12, 2007 requesting information concerning the alleged separation of the blades, or pieces thereof, from the engine's electric cooling fan on certain 2002 Winnebago Rialta / Vista vehicles.

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

Please contact me if you have any questions regarding this response.

Regards,



John Maddox  
Product Compliance/TREAD Officer  
Volkswagen of America

Attachments

Request 1.

State, by model and model year, the number of subject vehicles VW has manufactured for sale or lease in the United States. 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."

**Volkswagen is providing all responses to this inquiry from the date of the EA03-013 inquiry through the date of the RQ07-003 inquiry.**

Response 1.

**In response to this inquiry, Volkswagen has identified the following production quantity for 2002 Winnebago Rialta / Vista vehicles. Volkswagen's records do not differentiate between which chassis were built by Winnebago into Rialta models or Vista models.**

MODEL	MY 2002
Winnebago Rialta / Vista	1,537

**Our response to subparagraphs a. through g. have been previously provided in response to PE03-015 and updated to include warranty start date in response to EA03-013. These files were provided in a Microsoft Excel table entitled "PRODUCTION DATA.xls" in response to PE03-015 and EA03-013.**

Source: Business Objects

Date Gathered: May 14, 2003, updated September 06, 2003

## Request 2.

State the number of each of the following, received by VW, or of which VW is otherwise aware, which relate to, or may relate to, the alleged defect in the subject vehicles:

- a. Consumer complaints, including those from fleet operators;
- b. Field reports, including dealer field reports and reports from Winnebago Industries;
- 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, Volkswagen has identified 8 additional consumer complaints from 7 unique vehicles related to the alleged defect in the subject vehicles since our response to EA03-013; none of which are from fleet operators. Volkswagen is also providing copies of complaints in which the allegations do not allow Volkswagen to determine if they may or may not be related to the alleged defect in the subject vehicles.**
- b. **In response to this inquiry, Volkswagen has not identified any additional field reports which relate to the alleged defect in the subject vehicles since our response to EA03-013. Volkswagen is providing copies of complaints in which the allegations do not allow Volkswagen to determine if they may or may not be related to the alleged defect in the subject vehicles.**
- c. **In response to this inquiry, Volkswagen has not identified any 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 the alleged defect in the subject vehicle, property damage claims, consumer complaints, or field reports.**
- d. **In response to this inquiry, Volkswagen has not identified any 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 the alleged defect in the subject vehicle, property damage claims, consumer complaints, or field reports.**

- e. In response to this inquiry, Volkswagen has not identified any property damage claims related to the alleged defect in the subject vehicles.
- f. In response to this inquiry, Volkswagen 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, Volkswagen has identified one breach of warranty lawsuit related to the alleged defect in the subject vehicles, in which VW is or was a defendant or codefendant.

Source: LISTEN, PLE, FRED, TACS Date Gathered: After September 02, 2003 (EA03-013) up to the date of the inquiry

### Request 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. Report or claim date;
- i. Whether a crash is alleged;
- j. Whether a fire is alleged;
- k. Whether property damage is alleged;
- l. Number of alleged injuries, if any; and
- m. Number of alleged fatalities, if any.

Provide this information in Microsoft Access 2000, or a compatible format, entitled "REQUEST NUMBER TWO DATA."

### Response 3.

**Responses to subparagraphs a. through m. are provided in Microsoft Excel format attached hereto as Exhibit to Request 3. These cases are organized by category then by case number.**

**Volkswagen is also providing copies of complaints, in which the allegations do not allow Volkswagen to determine if they may or may not be related to the alleged defect in the subject vehicles.**

**Volkswagen notes the Customer Relation cases refer to all Winnebago Rialta / Vista vehicles as Volkswagen "Eurovan" vehicles, when in fact they are Rialta / Vista vehicles. The third digit of the Vehicle Identification Number can be used to distinguish between a Winnebago Rialta / Vista and a Volkswagen Eurovan. The digit (3) in the VIN indicates a Winnebago Rialta / Vista and the digit (2) indicates a Volkswagen Eurovan.**

Source, Date Gathered: See Response Two

**Exhibit to Request 3**

**REQUEST NUMBER TWO DATA**

**&**

**NON-SPECIFIC NUMBER TWO DATA**

**Data is provided in Microsoft Excel format in the REQUEST NUMBER TWO folder on the  
RQ07-002 Data Collection Disc**

Request 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.

**In response to this inquiry, Volkswagen is providing copies of documents identified for each item in Response 2. The documents are provided in an Adobe Acrobat file attached hereto as Exhibit to Request 4. These cases are organized by category then by case number.**

**Volkswagen is also providing copies of consumer complaints in which the reason for the claim does not allow Volkswagen to determine if they may or may not be related to the alleged defect. Information on these claims is provided in an Adobe Acrobat file attached hereto as Exhibit to Request 4. These cases are organized by category then by case number.**

**Volkswagen notes the Customer Relation cases refer to all Winnebago Rialta / Vista vehicles as Volkswagen "Eurovan" vehicles, when in fact they are Rialta / Vista vehicles. The third digit of the Vehicle Identification Number can be used to distinguish between a Winnebago Rialta / Vista and a Volkswagen Eurovan. The digit (3) in the VIN indicates a Winnebago Rialta / Vista and the digit (2) indicates a Volkswagen Eurovan.**

Source, Date Gathered: See Response Two

**Exhibit to Request 4**

**REQUEST NUMBER FOUR DATA**

**&**

**NON-SPECIFIC NUMBER FOUR DATA**

**Data is provided in Adobe Acrobat format in the REQUEST NUMBER FOUR folder on  
the RQ07-002 Data Collection Disc**

Request 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.

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."

Response 5.

**In response to this inquiry, Volkswagen has identified 15 warranty claims that relate to the alleged defect in the subject vehicles since our response to EA03-013. Volkswagen notes that one of these claims is duplicative of a consumer complaint. Volkswagen is also providing copies of claims, in which the allegations do not allow Volkswagen to determine if they may or may not be related to the alleged defect in the subject vehicles.**

**Our response to this request is provided in Microsoft Excel format attached hereto as Exhibit to Request 5. These cases are organized by case number.**

Source: Business Objects Warranty Claims Universe

Date Gathered: After September 02, 2003 (EA03-013) up to the date of the inquiry

**Exhibit to Request 5**

**REQUEST NUMBER FIVE DATA**

**&**

**NON-SPECIFIC NUMBER FIVE DATA**

**Data is provided in Microsoft Excel format in the REQUEST NUMBER FIVE folder on the RQ07-002 Data Collection Disc**

Request 6.

Identify all other VW vehicles produced after the end date of the scope of recall WB that utilize the subject components. For those vehicles identified, provide production data, and, the information requested by Requests Nos. 1 through 5 above. Please label the associated files to these responses as "other vehicles," e.g., PRODUCTION DATA: OTHER VEHICLES, etc.

**Volkswagen defines "all other VW vehicles" to include those vehicles produced after the end date (i.e. last production date June 16, 2000) of the scope of recall WB, that are equipped with the same subject cooling fan component part number, except the subject 2002 MY Winnebago Rialta / Vista vehicles.**

Response 6.1.

In response to this inquiry, Volkswagen has identified the following "all other VW vehicles" population.

MODEL	MODEL YEAR	POPULATION
Winnebago Rialta / Vista	2001	710
	2003	1,211
Eurovan	2001	2,947
	2002	5,473
	2003	4,673

Table 1

Source: Business Objects Date Gathered: May 14, 2003, updated September 06, 2003

Our response to Table 1 subparagraphs a. through g. has been previously provided in response to PE03-015 and updated to include warranty start date in response to EA03-013. These files were provided in Microsoft Excel tables entitled "PRODUCTION DATA.xls" in response to PE03-015 and EA03-013.

MODEL	MODEL YEAR	POPULATION
Winnebago Rialta / Vista	2004	465

Table 2

Source: Business Objects Date Gathered: Through the date of the Inquiry

Our response to Table 2 subparagraphs a. through g. is provided in a Microsoft Excel file attached hereto as Exhibit to Request 6.1.

**Exhibit to Request 6.1**

**PRODUCTION DATA - OTHER VEHICLES**

**Data is provided in Microsoft Excel format on the RQ07-002 Data Collection Disc**

Response 6.2.

- a. In response to this inquiry, Volkswagen has identified 8 Winnebago Rialta / Vista and 4 Volkswagen Eurovan consumer complaints related to the alleged defect in "all other VW vehicles" since our response to EA03-013; none of which are from fleet operators. Volkswagen is also providing copies of complaints in which the allegations do not allow Volkswagen to determine if they may or may not be related to the alleged defect in "all other VW vehicles".
- b. In response to this inquiry, Volkswagen has identified one Winnebago Rialta / Vista field report which relates to the alleged defect in "all other VW vehicles" since our response to EA03-013.
- c. In response to this inquiry, Volkswagen has not identified any 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 the alleged defect in "all other VW vehicles", property damage claims, consumer complaints, or field reports.
- d. In response to this inquiry, Volkswagen has not identified any 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 the alleged defect in "all other VW vehicles", property damage claims, consumer complaints, or field reports.
- e. In response to this inquiry, Volkswagen has not identified any property damage claims related to the alleged defect in "all other VW vehicles".
- f. In response to this inquiry, Volkswagen has not identified any third-party arbitration proceedings related to the alleged defect in "all other VW vehicles" where VW is or was a party to the arbitration.
- g. In response to this inquiry, Volkswagen has not identified any lawsuits related to the alleged defect in "all other VW vehicles", in which VW is or was a defendant or codefendant.

Source: LISTEN, PLE, FRED, TACS Date Gathered: After September 02, 2003 (EA03-013) up to the date of the inquiry

Response 6.3.

Responses to subparagraphs a. through m. are provided in Microsoft Excel format attached hereto as Exhibit to Request 6.3. These cases are organized by category then by case number.

Volkswagen is also providing copies of complaints, in which the allegations do not allow Volkswagen to determine if they may or may not be related to the alleged defect in the subject vehicles.

Volkswagen notes the Customer Relation cases refer to all Winnebago Rialta / Vista vehicles as Volkswagen "Eurovan" vehicles, when in fact they are Rialta / Vista vehicles. The third digit of the Vehicle Identification Number can be used to distinguish between a Winnebago Rialta / Vista and a Volkswagen Eurovan. The digit (3) in the VIN indicates a Winnebago Rialta / Vista and the digit (2) indicates a Volkswagen Eurovan.

Source, Date Gathered: See Response 6.2

**Exhibit to Request 6.3**

**REQUEST NUMBER TWO DATA - OTHER VEHICLES**

**&**

**NON-SPECIFIC NUMBER TWO DATA - OTHER VEHICLES**

**Data is provided in Microsoft Excel format in the  
REQUEST NUMBER TWO - OTHER VEHICLES folder on the RQ07-002 Data Collection Disc**

**Response 6.4.**

In response to this inquiry, Volkswagen is providing copies of documents identified for each item in Response 6.2. The documents are provided in an Adobe Acrobat file attached hereto as Exhibit to Request 6.4. These cases are organized by category then by case number.

Volkswagen is also providing copies of consumer complaints in which the reason for the claim does not allow Volkswagen to determine if they may or may not be related to the alleged defect. Information on these claims is provided in an Adobe Acrobat file attached hereto as Exhibit to Request 6.4. These cases are organized by category then by case number.

Volkswagen notes the Customer Relation cases refer to all Winnebago Rialta / Vista vehicles as Volkswagen "Eurovan" vehicles, when in fact they are Rialta / Vista vehicles. The third digit of the Vehicle Identification Number can be used to distinguish between a Winnebago Rialta / Vista and a Volkswagen Eurovan. The digit (3) in the VIN indicates a Winnebago Rialta / Vista and the digit (2) indicates a Volkswagen Eurovan.

Source, Date Gathered: See Response 6.2

Exhibit to Request 6.4

REQUEST NUMBER FOUR DATA - OTHER VEHICLES

&

NON-SPECIFIC NUMBER FOUR DATA - OTHER VEHICLES

Data is provided in Adobe Acrobat format in the  
REQUEST NUMBER FOUR - OTHER VEHICLES folder on the RQ07-002 Data Collection Disc

**Response 6.5.**

In response to this inquiry, Volkswagen has identified 13 Winnebago Rialta / Vista and 27 Volkswagen Eurovan warranty claims on 12 Winnebago Rialta / Vista and 26 Volkswagen Eurovan unique vehicles, that relate to the alleged defect in "all other VW vehicles" since our response to EA03-013. Volkswagen notes that one Winnebago Rialta / Vista claim is duplicative of a consumer complaint. Volkswagen is also providing copies of claims, in which the allegations do not allow Volkswagen to determine if they may or may not be related to the alleged defect in "all other VW vehicles".

Our response to this request is provided in Microsoft Excel format attached hereto as Exhibit to Request 6.5. These cases are organized by case number.

Source: Business Objects Warranty Claims Universe

Date Gathered: After September 02, 2003 (EA03-013) up to the date of the inquiry

**Exhibit to Request 6.5**

**REQUEST NUMBER FIVE DATA - OTHER VEHICLES**

**&**

**NON-SPECIFIC NUMBER FIVE DATA - OTHER VEHICLES**

**Data is provided in Microsoft Excel format in the  
REQUEST NUMBER FIVE - OTHER VEHICLES folder on the RQ07-002 Data Collection Disc**

Request 7.

Describe in detail the search criteria used by VW to identify the claims identified in response to Request No. 5, including the labor operations, problem codes, part numbers and any other pertinent parameters used. Provide a list of all labor operations, labor operation descriptions, problem codes, and problem code descriptions applicable to the alleged defect in the subject vehicles. State, by make and model year, the terms of the new vehicle warranty coverage offered by VW on the subject vehicles (i.e., the number of months and mileage for which coverage is provided and the vehicle systems that are covered). Describe any extended warranty coverage option(s) that VW offered for the subject vehicles and state by option, model, and model year, the number of vehicles that are covered under each such extended warranty.

Response 7.

In response to this inquiry, the following methods were used to identify claims in response to request number five.

1. All model year 2002 Winnebago Rialta / Vista subject vehicles manufactured for sale or lease in the United States.
2. Data received after September 02, 2003 (EA03-013) up to the date of the inquiry.
3. All warranty claims containing the following subject part identifiers or subject part numbers:  
  
1908 Cooling Fan  
1905 Fan Motor  
  
7D0959455K
4. All resultant claims were then screened individually for relevance to the alleged defect in the subject vehicles.

Volkswagen notes that the labor operation 19081921 (Electric Fan remove and reinstall) is the standard Labor Operation Number associated with removal and installation of the cooling fan.

Volkswagen has identified, through screening the resultant claims, a list of problem codes and problem code descriptions that were used in claims relating to the alleged defect in the subject vehicles. The following overviews these findings:

- 10 – Mechanical Defect
- 11 – Incorrectly Adjusted
- 15 – Torn, broken, Electrical open circuit
- 16 – Ineffective
- 17 – Stiff
- 18 – Loose
- 20 – Noisy
- 33 – Corrosion
- 40 – Electrical Defects
- 50 – Leaking
- 88 – Vehicle Towed in to Dealership

Volkswagen notes that service personnel may not consistently use the appropriate Damage Code when entering a warranty claim.

The following is a list, by make and model year, of the terms of the new vehicle warranty coverage offered by Volkswagen on the subject vehicles:

Model Year	Warranty Terms and Vehicle	Coverage Type
2002	2 Years / 24,000 miles: Winnebago Rialta / Vista	Limited New Vehicle Warranty

Source: VWoA Date Gathered: After September 02, 2003 (EA03-013) up to the date of the inquiry

Request 8.

Produce copies of all service, warranty, and other documents that relate to, or may relate to, the alleged defect in the subject vehicles, including the vehicles identified in response to Request No. 6 ("other 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 8.

Volkswagen has identified 1 Safety Recall Campaign Circular (WB), 1 Service Action Campaign Circular (VJ), 1 Technical Bulletin and 1 Special Parts Notice related to the alleged defect in the subject vehicles or "all other VW vehicles" since our response to EA03-013. Volkswagen notes that the Technical Bulletin and Special Parts Notice were published and released as a precautionary measure to inform the dealers about possible subject part damage during service and shipping of service parts.

Volkswagen will be publishing an updated version of the Technical Bulletin within the next 120 days to remind franchised and independent dealers of the importance of not using any device that presses against the radiator assembly or radiator fan assemblies, and will provide a draft copy at the Agency's request.

Our response to this request is provided in Adobe Acrobat format attached hereto as Exhibit to Request 8.

Source: VWoA product support, VWoA parts, VESIS

Date Gathered: After September 02, 2003 (EA03-013) up to the date of the inquiry

**Exhibit to Request 8**

**REQUEST NUMBER EIGHT**

**Data is provided in Adobe Acrobat format in the REQUEST NUMBER EIGHT folder on the RQ07-002 Data Collection Disc**

Request 9.

Describe all assessments, analyses, tests, test results, studies, surveys, simulations, investigations, inquiries and/or evaluations (collectively, "actions") that relate to, or may relate to, the alleged defect in the subject vehicles, including "other vehicles," that have been conducted, are being conducted, are planned, or are being planned by, or for, VW. For each such action, provide the following information:

- a. Action title or identifier;
- b. The actual or planned start date;
- c. The actual or expected end date;
- d. Brief summary of the subject and objective of the action;
- e. Engineering group(s)/supplier(s) responsible for designing and for conducting the action; and
- f. A brief summary of the findings and/or conclusions resulting from the action.

For each action identified, provide copies of all documents related to the action, regardless of whether the documents are in interim, draft, or final form. Organize the documents chronologically by action.

Response 9.

Action 1

- a. **Attachment 9\_Action 1 – E-mail Communication**
- b. **May 13, 2003**
- c. **N/A**
- d. **E-mail Communication about field failures**
- e. **VWoA**
- f. **Non-conclusive communication**

Action 2

- a. **Attachment 9\_Action 2 - Inspection Report "Timmons Long Beach" [German original and English translation]**
- b. **September 2007**
- c. **September 2007**
- d. **Inspection of the vehicle that had an alleged cooling fan separation in order to find a possible cause for the alleged defect, verify if the recall has been performed and if the vehicle was repaired properly and whether appropriate tools have been used.**
- e. **Quality Department - Volkswagen Commercial Vehicles**
- f. **The dealership appears unfamiliar with the required tools for proper vehicle maintenance. The cooling fans were not installed according to VW specifications and needed re-work. The warning label was not present in the vehicle at the date of the inspection.**

Action 3

- a. **Attachment 9\_Action 3 - Inspection Report "Moffitt VW" [German original and English translation]**
- b. **September 2007**
- c. **September 2007**
- d. **Inspection of the vehicle that had an alleged cooling fan separation in order to find a possible cause for the alleged defect, verify if the recall has been performed and if the vehicle was repaired properly and whether appropriate tools have been used.**
- e. **Quality Department - Volkswagen Commercial Vehicles**
- f. **The customer has replaced the fan wheel by himself. The part was taken from scrap (previously removed recall part). The cooling fans were not installed according to VW specifications. The warning label was not present in the vehicle and the required special tool was not available at the dealership.**

Action 4

- a. Attachment 9\_Action 4 - Inspection Report "Royal Motor" [German original and English translation]
- b. September 2007
- c. September 2007
- d. Inspection of the vehicle that had an alleged cooling fan separation in order to find a possible cause for the alleged defect, verify if the recall has been performed and if the vehicle was repaired properly and whether appropriate tools have been used.
- e. Quality Department - Volkswagen Commercial Vehicles
- f. The cooling fans were not installed according to VW specifications. The parts used pretend to be aftermarket parts, however they show evidence of re-labeling and removed Volkswagen and Siemens logos.
- g. Required special tool was at hand at the dealership but appears to be used rather seldom (if used at all).

**Exhibit to Request 9**

**REQUEST NUMBER NINE**

**Data is provided in Adobe Acrobat format in the REQUEST NUMBER NINE folder on the RQ07-002 Data Collection Disc**

Request 10.

Describe all modifications or changes made by, or on behalf of, VW in the design, material composition, manufacture, quality control, supply, or installation of the subject component, from the start of production to date, which relate to, or may relate to, the alleged defect in the subject vehicles. For each such modification or change, provide the following information:

- a. The date or approximate date on which the modification or change was incorporated into vehicle production;
- b. A detailed description of the modification or change;
- c. The reason(s) for the modification or change;
- d. The part number(s) (service and engineering) of the original component;
- e. The part number(s) (service and engineering) of the modified component;
- f. Whether the original unmodified component was withdrawn from production and/or sale, and if so, when;
- g. When the modified component was made available as a service component; and
- h. Whether the modified component can be interchanged with earlier production components.

Also, provide the above information for any modification or change that VW is aware of which may be incorporated into vehicle production within the next 120 days.

Response 10.

**In response to this inquiry, there have been no modifications or changes made by, or on behalf of, VW in the design, material composition, manufacture, quality control, or installation of the subject component after the measures described in Volkswagen's response to EA03-013. However in conjunction with Safety Recall WB in January of 2004, Volkswagen withdrew all existing service parts from sale due to potential for packaging issues.**

**In response to this inquiry, Volkswagen did not identify any modifications to the subject component to be incorporated into the vehicle production within the next 120 days.**

Request 11.

Produce one of each of the following:

- a. Exemplar samples of each design version of the subject component;
- b. Field return samples of the subject component exhibiting the subject failure mode; and
- c. Any kits that have been released, or developed, by VW for use in service repairs to the subject component/assembly which relate, or may relate, to the alleged defect in the subject vehicles, including "other vehicles."

Response 11.

- a. **An exemplar sample of the only design version of the subject component is included.**
- b. **Volkswagen does not have any field return samples of the subject component exhibiting the subject failure mode.**
- c. **Volkswagen is providing a sample kit which was released by VW for use in safety recall WB, which relates to the alleged defect in the subject vehicles.**

Request 12.

State the number of each of the following that VW has sold that may be used in the subject vehicles, including "other vehicles." by component name, part number (both service and engineering/production), model and model year of the vehicle in which it is used and month/year of sale (including the cut-off date for sales, if applicable):

- a. Subject component; and
- b. Any kits that have been released, or developed, by VW for use in service repairs to the subject component/assembly.

For each component part number, provide the supplier's name, address, and appropriate point of contact (name, title, and telephone number). Also identify by make, model and model year, any other vehicles of which VW is aware that contain the identical component, whether installed in production or in service, and state the applicable dates of production or service usage.

Response 12.

- a. In response to this inquiry, Volkswagen is providing parts sales data in Microsoft Excel format attached hereto as Exhibit to Request 12. Volkswagen believes that a majority of the part sales are related to other external factors such as noise or electrical malfunctions which are not related to the "separation of the blades, or pieces therefore, from the engine's electronic cooling fan" in the subject vehicles.
- b. Volkswagen has not released or developed any kits for use in service relating to the subject component, except the kit used for recall WB - which is not released for regular service purposes.

Source: SAP BWP Production , Date Gathered: Through the date of the inquiry

**Supplier Information:**

**Siemens Electric Limited  
Automotive Systems  
North American Motor Operations  
1020 Adelaide Street South  
CDN-N6E 1R6 London (Ontario, Canada)**

**Contact: Mr. Scott Cole, Phone: (519) 680-5781**

**Exhibit to Request 12**

**PART SALES DATA**

**Data is provided in Microsoft Excel format on the RQ07-002 Data Collection Disc**

Request 13.

Furnish VW's assessment of the alleged defect in the subject vehicle, including "other vehicles." VW response to this request should include the following:

- a. The causal or contributory factor(s);
- b. The failure mechanism(s);
- c. The failure mode(s);
- d. The risk to motor vehicle safety that it poses;
- e. What warnings, if any, the operator and the other persons both inside and outside the vehicle would have that the alleged defect was occurring or subject component was malfunctioning; and
- f. The reports included with this inquiry.

Response 13.

Volkswagen has analyzed the responsive complaints identified through all investigations on the subject component.

Volkswagen notes that the failure rates of the subject cooling fan due to blade separation in MY 1998-2003 Winnebago Rialta / Vista vehicles have dropped substantially since the implementation of the campaign. Volkswagen's analysis of responsive complaints identified before launching the campaign resulted in a rate of 6.81 R/1000, which dropped substantially to a failure rate of 2.66 R/1000 after the launch of the campaign. Volkswagen believes this is due to several field actions affecting MY 1998-2003 Winnebago Rialta / Vista vehicles, namely: informing the dealership of proper service procedures for the radiator module in the form of a technical bulletin, updated service literature to dealers, improved spare parts packaging, providing customers with a warning/caution label not to put force on the fan wheel, providing Winnebago Rialta / Vista customers with an updated label with the appropriate charge for the a/c system and the development of a special tool to assist dealers with holding the vehicle in the service position when performing repairs.

In the course of EA03-013, Volkswagen performed an extensive testing program and verified that the production cooling fans exhibit no flaws in material, design, and development. At the time of the inquiry (in 2003) it was determined that the alleged defect was caused by external influence, specifically unwanted load being placed directly on the cooling fan while the vehicle was in service position.

In order to assist the workshop technicians, Volkswagen developed a special tool which allows the technicians to continue their "accustomed" repair method of tilting the front end without detaching the coolant hoses while protecting the cooling fans from being damaged by a "makeshift" propping device, such as piece of wood or a hammer.

However, the inspection reports of the three "VOQ vehicles" show that this special tool was ignored and not used in these workshops – still creating the risk of damaging the cooling fans during maintenance and repairs.

Additionally, VW found discrepancies with the service parts used for some repairs. One inspection shows inappropriate "dealership practices" which provided scrap fan blades for customers to assemble and install into the vehicle, presumably instead of replacing the entire fan assembly. This practice is not condoned by VW for obvious reasons, and especially since it does not include fine balancing of the fan wheel. A second inspection found "aftermarket" parts installed in one vehicle which appear to be OEM parts where the supplier logo had clearly been ground off. Volkswagen and its supplier were not able to determine how the parts were introduced into the aftermarket or into the vehicle because no parts have been sold to other parties beyond Volkswagen. Currently, Volkswagen must assume that these parts are reworked parts which have been removed from vehicles. Volkswagen does not condone this practice.

The cooling fans in the subject vehicles are packaged in a way that minimizes the risk of personal injury in the rare event of a blade fracture. The blades of both fans are shielded by a horizontal metal bracket, which covers the access to the blade of the fan. The bracket overlaps the fan by approximately 25 mm. Located on top of this is a shroud, covering the majority of the engine, including all of the fan assembly from the top of the engine compartment. The shroud effectively minimizes the possibility of a fractured blade leaving the confines of the upper engine compartment, even with the hood open. Volkswagen is not aware of any allegations of injury or loss of vehicle control due to fractured fan blades in the subject vehicles.

As a precautionary measure, Volkswagen will publish an updated version of the Technical Bulletin to remind franchised and independent dealers of the importance of not using any device that presses against the radiator assembly or radiator fan assemblies, and to use the special tool to hold back the front end during service and repairs. In addition, Volkswagen will also request that Winnebago Industries distribute the same or similar technical bulletin to their franchises and known independent repair shops to ensure that the vehicle is being serviced correctly with the proper required tools.

#### Summary

Based on the declining incident rate identified in response to this inquiry, the complete lack of any injuries and the very low risk for potential personal injury, Volkswagen strongly believes that there is no unreasonable risk to motor vehicle safety related to the alleged defect in the subject vehicles.