# **VOLKSWAGEN**

GROUP OF AMERICA

Ms. Nancy Lummen Lewis
Acting Associate Administrator for Enforcement
National Highway Traffic Safety Administration
Attention: Recall Management Division (NVS-215)
1200 New Jersey Avenue, S.E.
Washington, DC 20590

CHRISTOPHER T. SANDVIG NAME

GENERAL MANAGER COMPLIANCE / TITLE

PRODUCT COMPLIANCE DEPARTMENT

248-754-5000 PHONE

248-754-5093 FAX

NOVEMBER 14, 2012 DATE

Subject: Notification of Voluntary Recall

2012-2013 Model Year Volkswagen Beetle

Passenger Occupant Detection System Control Module (J706)

VOLKSWAGEN GROUP OF AMERICA, INC. 3800 HAMLIN ROAD AUBURN HILES, MI 4B126 PHONE +1 248 754 5000

Dear Ms. Lewis:

This information is submitted in accordance with the requirements of Part 573 of Title 49 of the Code of Federal Regulations (49 CFR 573 (2012)).

573.6 (c) (1) Manufacturer's Name

Volkswagen de Mexico, A.A. de C.V.

importer

Volkswagen Group of America, Inc. (VWGoA)

573.6 (c) (2) Identification of Vehicles

Make : Volkswagen

Line : Beetle

Model Year : 2012-2013

Month/Year

of Manufacture : February 2012 through August 2012

VIN Numbers

of Affected Vehicles: 3VW\_ \_ AT\_CM627280 - 3VW\_ \_ AT\_DM800109

Other Identification: Vehicles equipped with leather sport seats

573.6 (c) (3) Number of Vehicles Potentially Containing the Defect

2,471 vehicles are affected by this defect in the United States.

573.6 (c) (4) Percentage of Vehicles Actually Containing the Defect

Volkswagen estimates that 100% of affected vehicles contain the defect.

# 573.6 (c) (5) Description of Defect

Vehicles equipped with leather sport seats have been built with an incorrectly coded Passenger Occupant Detection System control module (J706) in the right front passenger location. If the leather seat gets wet, the control module may not properly detect a child restraint secured on the right front passenger seat, and the right front passenger air bag will not be turned off as expected. The air bag off light will not illuminate, alerting the driver that the passenger air bag has not been turned off.

If the right front passenger air bag is not turned off when a child restraint is secured on the right front passenger seat, there is a risk of serious injury to the child seated there in the event of a crash with air bag deployment.

# 573.6 (c) (6) Basis for Determination

- During routine production inspections, the incorrect system reaction was observed at the end of June 2012.
- After evaluation in the factory, the production plant escalated the matter to Volkswagen AG in mid September 2012.
- After investigation and clarification of the system behavior in various ambient conditions (temperatures, air humidity, water spilled on the seat), it was determined that a child seat may not be properly detected in vehicles equipped with leather seats.
- On November 7, 2012, the matter was presented to the product safety committee at Volkswagen AG, and the committee decided to implement a safety recall.

# 573.6 (c) (7) Noncompliance Test Result

Not applicable

#### 573.6 (c) (8) Proposed Remedial Program

When sufficient quantities of Passenger Occupant Detection System control modules (J706) are available, VWGoA plans to notify all owners of affected vehicles and will instruct them to arrange for an appointment with an authorized Volkswagen dealer. Dealers will replace the control module in the affected vehicles for customers free of charge.

Pending parts availability, mailing dates are anticipated as follows:

Dealers: To be determined Owners: To be determined

#### 573.6 (c) (9) Submission of Communications

A representative copy of all bulletins and other communications sent to dealers and owners will be submitted within five (5) days of dealer/owner notification.

### 573.6 (c) (10) Proposed Owner Letter

A draft owner's letter will be submitted to the agency for review and approval.

#### 573.6 (c) (11) Manufacturer's Recall Code

VWGoA has assigned the code 69i9/W6 to this recall.

Sincerely,

Christopher T. Sandvig

General Manager Compliance/TREAD