Frequently Asked Questions & Answers for Compliance Recall UY

This FAQ is intended to provide supplementary information regarding the UY compliance recall. For additional information, please refer to the UY Compliance Recall circular that will be posted on web VESIS and on the VWHub.

What vehicles are affected? How many?

At this time, some 2004 and some early 2005 model year Volkswagen Touareg vehicles in dealer <u>new</u> vehicle stock are affected. These vehicles need to be inspected and, if necessary, have one or both rear outboard seat belts replaced.

Currently, this action affects approximately 6,740 <u>new, unsold vehicles in U.S. dealer stock</u>. At a later date, approximately 43,000 vehicles (already sold to customers) will be added; the repair solution will be different for these vehicles and will be announced at that time.

What is the problem?

Volkswagen has found that the rear outboard seat belts in affected vehicles do not comply with FMVSS 208 S7.1.1.5 with regard to the rear seat belt locking feature used when installing some child seats.

What exactly is the non-compliance that the campaign is addressing?

This campaign is designed to address the non-compliant automatic locking retractor (ALR) feature of some 2004/2005 Touareg rear outboard seat belts when those belts are used to secure a child restraint.

The vehicles did not comply with an applicable Federal Motor Vehicle Safety Standard with regard to the seat belt locking feature in the outboard rear seating positions. All three rear seat positions and the front passenger position are equipped with seat belt retractors that have a locking feature which converts the retractor from an emergency locking retractor (ELR) mode to an automatic locking retractor (ALR) mode for the purpose of child restraint installation. The belts convert to the ALR mode after the webbing has been drawn fully out of the retractor. As the belt is then released into the retractor, the system remains in the ALR mode so that the belt can be tensioned for securing a child restraint.

However, for the rear outboard seating positions, the ALR mode changes to the ELR mode at a point before all of the webbing of a belt, which the latch plate has been inserted into the buckle, has been fed back into the retractor. As a result, the belt may deactivate the ALR mode with a small number of forward-facing child restraints (which have a short belt routing path). In that case, the child restraints are not securely installed within the meaning of the requirement.

The seat belt in the center rear seating position is fully compliant and is not affected by this action.

In general, we recommend that the LATCH system in the vehicle be used to secure a child seat, if that child seat is LATCH-equipped.

How is this campaign being initiated?

This campaign will be initiated in two phases.

- The first phase is for new, unsold vehicles in dealer stock. These vehicles are tagged with
 the UY action in OTIS and must be inspected and, if necessary, one or both rear outboard
 seat belts must be replaced before they can be sold. Federal law prohibits any person from
 knowingly selling, or offering for sale, any motor vehicle that does not comply with
 applicable motor vehicle safety standards prescribed under Chapter 301 ("Motor Vehicle
 Safety") of Title 49, United States Code. It is therefore imperative that any vehicle in
 your inventory that is affected by this recall is corrected prior to delivery for sale or
 lease. Dealers should be sure to check OTIS to identify which of their new/unsold 20042005 Touaregs may be affected by this action.
- The second phase will be to notify customers of affected vehicles that are already sold. At that time, all sold/used vehicles will be identified in the OTIS system. This phase is scheduled to take place in April 2005.

Can the rear outboard belts be used until the vehicle is repaired? What if I need to use a child restraint in my vehicle?

Adults can use the rear seat belts normally.

Most child seats can be properly secured in your vehicle. This includes rear-facing infant seats, most forward-facing child seats, and booster seats. Only a few child seats will use so little belt length to cause the seat belt retractor to switch from ALR to ELR mode prematurely. When using a child seat in your vehicle, be sure to follow the instructions that came with the child seat, and be sure to put the seat belt height adjuster in the top most position.

The center rear seat belt is not affected by this action. Therefore, for the small number of forward facing child seats that cannot be properly secured in a rear outboard seat belt, the center rear seat belt is an option.

If a child seat was built with the LATCH system, the LATCH system in the vehicle can be used to properly secure the child seat. Again, be sure to follow the instructions that came with the child seat.

■ What about vehicles used as demos? And what about used and customer vehicles?

Vehicles used as "demonstrators," used vehicles, and customer vehicles are <u>not</u> included at this time. Notification to these customers is scheduled to take place in April 2005 when the final repair solution is available.

■ What exactly does the repair involve?

Both rear outboard seat belts must be inspected. If necessary, one or both rear outboard seat belts must be replaced.

How long does the repair take?

The inspection takes just a few minutes; the seat belt replacement can take over two hours.

■ Are customer vehicles affected by this action?

At this time, there is no recall applicable for customer vehicles or used vehicles in dealer stock. An action affecting these vehicles is planned for April 2005. Affected vehicles will be identified and owners notified at that time.

■ When will parts be available?

Parts have begun to ship to dealers who have already placed orders against their in-stock new vehicles that have been inspected and require belt replacement.

Volkswagen is continuing to work diligently to obtain a continued flow of replacement parts, as well as the final service solution for already-sold vehicles available as quickly as possible. Please refer to the January 13, 2005 letter from Parts for information on ordering and availability. Parts will provide additional updates as necessary.

Why are new dealer stock vehicles being addressed now and why will it take longer before customers are notified?

Due to limited stock of rear outboard seat belts available, an interim service solution (seat belt replacement) has been implemented for vehicles in new dealer stock only until the final service solution is approved and available.

The final service solution will not require seat belt replacement, and these parts are scheduled to be available so all remaining vehicles can be notified in April 2005. Vehicles repaired under the current interim service solution can be sold and are fully compliant.

■ Can I use parts from another vehicle to repair an affected vehicle?

No. Affected vehicles must be repaired according to the instructions in the UY Compliance Circular posted on web VESIS and on the VWHub.

■ Will I have new vehicles in stock that I can sell?

Yes. Affected vehicles are identified in OTIS. Any vehicle not tagged with the UY compliance recall can be sold immediately. Also, vehicles that have been inspected (and closed out with UY11) that do not need belt replacement can be sold.