

VOLKSWAGEN

GROUP OF AMERICA

James C. Owens, Acting Administrator
National Highway Traffic Safety Administration
1200 New Jersey Avenue, S.E.
Washington, DC 20590

Christopher T. Sandvig NAME
Director Title
Group Customer Protection Department
248-754-5000 Phone
248-754-5093 Fax
May 20, 2020 Date

Subject: Petition for Inconsequential Noncompliance with
FMVSS 138, Tire Pressure Monitoring Systems
Certain 2019 – 2020 MY Volkswagen and Audi Vehicles

VOLKSWAGEN GROUP OF AMERICA, INC.
3800 HAMLIN ROAD
AUBURN HILLS, MI 48326
PHONE +1 248 754 5000

Dear Mr. Owens:

On May 15, 2020, Volkswagen Group of America, Inc. (Volkswagen) notified the National Highway Traffic Safety Administration (NHTSA) that it had determined a noncompliance under Federal Motor Vehicle Safety Standard (FMVSS) No. 138, Tire Pressure Monitoring Systems, existed in the following vehicles:

Volkswagen

- 2019 MY Volkswagen Golf;
- 2019 MY Volkswagen Golf Alltrack;
- 2019 MY Volkswagen Golf GTI;
- 2019 MY Volkswagen Golf Sportwagen;
- 2019 MY Volkswagen Golf R;
- 2019 MY Volkswagen Jetta;
- 2019 MY Volkswagen Jetta GLI;
- 2019 MY Volkswagen Tiguan;
- 2019-2020 MY Volkswagen Atlas;
- 2020 MY Volkswagen Atlas Cross Sport;

Audi

- 2019 MY Audi A3;
- 2019-2020 Audi A3 Cabriolet;
- 2019 Audi Q3

Under separate cover, Volkswagen has submitted to NHTSA the required notice and information under 49 C.F.R. Part 573 that identifies all vehicles affected by this noncompliance. Volkswagen has taken steps to stop the sale of new vehicles impacted by this noncompliance until the repair can be completed by the dealer.

Pursuant to 49 U.S.C. 30118(d) and 30120(h) and the rule implementing those provisions at 49 C.F.R. Part 556, Volkswagen petitions for an exemption from the notification and remedy requirements of 49 U.S.C. Chapter 301 on the basis that this noncompliance is inconsequential to motor vehicle safety.

Volkswagen is incorporated under the laws of the State of New Jersey, and maintains offices at 2200 Ferdinand Porsche Drive, Herndon, Virginia 20171.

Affected Vehicles

As set forth in the notice to NHTSA pursuant to 49 C.F.R. Part 573, the noncompliance relates to a total of 299,043 vehicles of the following Volkswagen models:

Volkswagen

- 2019 MY Volkswagen Golf vehicles, produced between November 26, 2018 and October 25, 2019;
- 2019 MY Volkswagen Golf Alltrack vehicles, produced between November 26, 2018 and October 25, 2019;
- 2019 MY Volkswagen Golf GTI vehicles, produced between November 26, 2018 and October 25, 2019;
- 2019 MY Volkswagen Golf Sportwagen vehicles, produced between November 26, 2018 and August 27, 2019;
- 2019 MY Volkswagen Golf R vehicles, produced between January 25, 2019 and August 19, 2019
- 2019 MY Volkswagen Jetta vehicles, produced between November 26, 2018 and October 23, 2019;
- 2019 MY Volkswagen Jetta GLI vehicles, produced between December 17, 2018 and October 23, 2019;
- 2019 MY Volkswagen Tiguan vehicles, produced between November 26, 2018 and August 17, 2019;
- 2019-2020 MY Volkswagen Atlas vehicles, produced between December 04, 2018 and February 19, 2020;
- 2020 MY Volkswagen Atlas Cross Sport vehicles, produced between April 19, 2019 and July 24, 2019

Audi

- 2019-2020 MY Audi A3 vehicles, produced between November 26, 2018 and January 24, 2020
- 2019 MY Audi A3 Cabriolet vehicles, produced between November 26, 2018 and July 12, 2019
- 2019 MY Audi Q3 vehicles, produced between May 21, 2019 and July 30, 2019

Noncompliant Condition

Vehicles sold in the U.S. must illuminate a low tire pressure warning telltale not more than 20 minutes after the inflation pressure in one or more of the vehicle's tires, up to a total of four tires, is equal to or less than either the pressure 25 percent below the vehicle manufacturer's recommended cold inflation pressure, or the pressure specified in the 3rd column of Table 1 of FMVSS 138 for the corresponding type of tire, whichever is higher. The affected vehicles meet the performance requirements

set forth in S4 of FMVSS 138, but in a small number of cases, they do not fully meet the test procedure requirements set forth S6(f)(3) of FMVSS 138. Thus, out of an abundance of caution, these vehicles were determined to be noncompliant.

In the affected vehicles, the TPMS system will detect both a rapid tire pressure loss, as well as a diffusion (meaning a long term pressure loss on multiple tires).

However, in certain instances where there is a simultaneous pressure loss on all 4 tires, in which the pressure loss occurs at the same rate and time, the detection may not occur within the prescribed timeframe of the FMVSS 138 test procedure.

Volkswagen notes that the subject vehicles are compliant with the monitoring provision of FMVSS No. 138, in that a rapid loss of tire pressure on one or more tires is still accurately detected by the tire pressure monitoring system, and will illuminate the low tire pressure warning telltale lamp as required.

Inconsequentiality of Non-compliance

The FMVSS 138 provision relevant to the testing requirement is S6(f)(3). The provision states:

S6(f)(3) The sum of the total cumulative drive time under paragraphs S6(f)(1) and (2) shall be the lesser of 20 minutes or the time at which the low tire pressure telltale illuminates.

Volkswagen submits that the condition described above is inconsequential as it relates to motor vehicle safety for the following reasons:

- A rapid tire pressure loss on one or more tires is accurately detected and the low tire pressure warning telltale will illuminate and warn the driver
- A pressure loss on fewer than 4 tires at the same time and rate will be detected and the low tire pressure warning telltale will illuminate and warn the driver
- A simultaneous pressure loss on all 4 tires at the same rate will be detected and indicated to the driver, but not in the required 20 minutes. Internal tests have shown that in those tests where the pressure loss was not detected in 20 minutes, a warning to the driver was still shown in under 50 minutes. Volkswagen believes this behavior is not relevant for real world driving, as this particular diffusion scenario, involving all 4 tires at the same time and same rate, is very unlikely to happen in real world driving.

As of the production dates listed below, the condition has been corrected:

Volkswagen

- 2019 MY Volkswagen Golf vehicles, as of October 26, 2019;
- 2019 MY Volkswagen Golf Alltrack vehicles, as of October 26, 2019;
- 2019 MY Volkswagen Golf GTI vehicles, as of October 26, 2019;
- 2019 MY Volkswagen Golf Sportwagen vehicles, as of August 28, 2019;
- 2019 MY Volkswagen Golf R vehicles, as of August 20, 2019
- 2019 MY Volkswagen Jetta vehicles, as of October 24, 2019;
- 2019 MY Volkswagen Jetta GLI vehicles, as of October 24, 2019;
- 2019 MY Volkswagen Tiguan vehicles, as of August 18, 2019;
- 2019-2020 MY Volkswagen Atlas vehicles, as of February 20, 2020;
- 2020 MY Volkswagen Atlas Cross Sport vehicles, as of July 25, 2019

Audi

- 2019-2020 MY Audi A3 vehicles, as of January 25, 2020
- 2019 MY Audi A3 Cabriolet vehicles, as of July 13, 2019
- 2019 MY Audi Q3 vehicles, as of July 31, 2019

Affected vehicles held at the factory have been corrected and unsold units in dealer inventory will be corrected prior to sale.

Additionally, Volkswagen is not aware of any field or customer complaints related to this condition, nor has it been made aware of any accidents or injuries that have occurred as a result of this issue.

Conclusion

For the forgoing reasons, Volkswagen submits that the subject noncompliance is inconsequential as it relates to motor vehicle safety and requests an exemption from the notification and remedy requirements of the Motor Vehicle Safety Act pursuant to 49 U.S.C. 30118(d) and associated regulations at 49 C.F.R. Part 556.

Please contact me if you require any additional information or have any questions related to this petition.

Sincerely,

Christopher T. Sandvig
Director, Group Customer Protection
VWGoA Group Quality

VOLKSWAGEN

GROUP OF AMERICA

James C. Owens, Acting Administrator
National Highway Traffic Safety Administration
1200 New Jersey Avenue, S.E.
Washington, DC 20590

Christopher T. Sandvig NAME
Director Title
Group Customer Protection Department
248-754-5000 Phone
248-754-5093 Fax
June 8, 2020 Date

Subject: Petition for Inconsequential Noncompliance with
FMVSS 138, Tire Pressure Monitoring Systems
Certain 2019 – 2020 MY Volkswagen and Audi Vehicles

VOLKSWAGEN GROUP OF AMERICA, INC.
3800 HAMLIN ROAD
AUBURN HILLS, MI 48326
PHONE +1 248 754 5000

Dear Mr. Owens:

Volkswagen has amended our May 20, 2020 petition letter to correct model year and production dates in order to match our filing information. On May 15, 2020, Volkswagen Group of America, Inc. (Volkswagen) notified the National Highway Traffic Safety Administration (NHTSA) that it had determined a noncompliance under Federal Motor Vehicle Safety Standard (FMVSS) No. 138, Tire Pressure Monitoring Systems, existed in the following vehicles:

Volkswagen

- 2019-2020 MY Volkswagen Golf;
- 2019 MY Volkswagen Golf Alltrack;
- 2019-2020 MY Volkswagen Golf GTI;
- 2019 MY Volkswagen Golf Sportwagen;
- 2019 MY Volkswagen Golf R;
- 2019-2020 MY Volkswagen Jetta;
- 2019-2020 MY Volkswagen Jetta GLI;
- 2019 MY Volkswagen Tiguan;
- 2019-2020 MY Volkswagen Atlas;
- 2020 MY Volkswagen Atlas Cross Sport;

Audi

- 2019-2020 MY Audi A3;
- 2019 Audi A3 Cabriolet;
- 2019 Audi Q3

Under separate cover, Volkswagen has submitted to NHTSA the required notice and information under 49 C.F.R. Part 573 that identifies all vehicles affected by this

noncompliance. Volkswagen has taken steps to stop the sale of new vehicles impacted by this noncompliance until the repair can be completed by the dealer.

Pursuant to 49 U.S.C. 30118(d) and 30120(h) and the rule implementing those provisions at 49 C.F.R. Part 556, Volkswagen petitions for an exemption from the notification and remedy requirements of 49 U.S.C. Chapter 301 on the basis that this noncompliance is inconsequential to motor vehicle safety.

Volkswagen is incorporated under the laws of the State of New Jersey, and maintains offices at 2200 Ferdinand Porsche Drive, Herndon, Virginia 20171.

Affected Vehicles

As set forth in the notice to NHTSA pursuant to 49 C.F.R. Part 573, the noncompliance relates to a total of 299,043 vehicles of the following Volkswagen models:

Volkswagen

- 2019-2020 MY Volkswagen Golf vehicles, produced between November 26, 2018 and October 25, 2019;
- 2019 MY Volkswagen Golf Alltrack vehicles, produced between November 26, 2018 and October 25, 2019;
- 2019-2020 MY Volkswagen Golf GTI vehicles, produced between November 26, 2018 and October 25, 2019;
- 2019 MY Volkswagen Golf Sportwagen vehicles, produced between November 26, 2018 and August 27, 2019;
- 2019 MY Volkswagen Golf R vehicles, produced between January 25, 2019 and August 19, 2019
- 2019-2020 MY Volkswagen Jetta vehicles, produced between November 26, 2018 and October 23, 2019;
- 2019-2020 MY Volkswagen Jetta GLI vehicles, produced between December 17, 2018 and October 23, 2019;
- 2019 MY Volkswagen Tiguan vehicles, produced between November 26, 2018 and August 17, 2019;
- 2019-2020 MY Volkswagen Atlas vehicles, produced between December 04, 2018 and February 19, 2020;
- 2020 MY Volkswagen Atlas Cross Sport vehicles, produced between April 19, 2019 and July 24, 2019

Audi

- 2019-2020 MY Audi A3 vehicles, produced between November 26, 2018 and January 24, 2020
- 2019 MY Audi A3 Cabriolet vehicles, produced between November 26, 2018 and July 12, 2019
- 2019 MY Audi Q3 vehicles, produced between May 21, 2019 and July 30, 2019

Noncompliant Condition

Vehicles sold in the U.S. must illuminate a low tire pressure warning telltale not more than 20 minutes after the inflation pressure in one or more of the vehicle's tires, up to a total of four tires, is equal to or less than either the pressure 25 percent below

the vehicle manufacturer's recommended cold inflation pressure, or the pressure specified in the 3rd column of Table 1 of FMVSS 138 for the corresponding type of tire, whichever is higher. The affected vehicles meet the performance requirements set forth in S4 of FMVSS 138, but in a small number of cases, they do not fully meet the test procedure requirements set forth S6(f)(3) of FMVSS 138. Thus, out of an abundance of caution, these vehicles were determined to be noncompliant.

In the affected vehicles, the TPMS system will detect both a rapid tire pressure loss, as well as a diffusion (meaning a long term pressure loss on multiple tires).

However, in certain instances where there is a simultaneous pressure loss on all 4 tires, in which the pressure loss occurs at the same rate and time, the detection may not occur within the prescribed timeframe of the FMVSS 138 test procedure.

Volkswagen notes that the subject vehicles are compliant with the monitoring provision of FMVSS No. 138, in that a rapid loss of tire pressure on one or more tires is still accurately detected by the tire pressure monitoring system, and will illuminate the low tire pressure warning telltale lamp as required.

Inconsequentiality of Non-compliance

The FMVSS 138 provision relevant to the testing requirement is S6(f)(3). The provision states:

S6(f)(3) The sum of the total cumulative drive time under paragraphs S6(f)(1) and (2) shall be the lesser of 20 minutes or the time at which the low tire pressure telltale illuminates.

Volkswagen submits that the condition described above is inconsequential as it relates to motor vehicle safety for the following reasons:

- A rapid tire pressure loss on one or more tires is accurately detected and the low tire pressure warning telltale will illuminate and warn the driver
- A pressure loss on fewer than 4 tires at the same time and rate will be detected and the low tire pressure warning telltale will illuminate and warn the driver
- A simultaneous pressure loss on all 4 tires at the same rate will be detected and indicated to the driver, but not in the required 20 minutes. Internal tests have shown that in those tests where the pressure loss was not detected in 20 minutes, a warning to the driver was still shown in under 50 minutes. Volkswagen believes this behavior is not relevant for real world driving, as this particular diffusion scenario, involving all 4 tires at the same time and same rate, is very unlikely to happen in real world driving.

As of the production dates listed below, the condition has been corrected:

Volkswagen

- 2019-2020 MY Volkswagen Golf vehicles, as of October 26, 2019;
- 2019 MY Volkswagen Golf Alltrack vehicles, as of October 26, 2019;
- 2019-2020 MY Volkswagen Golf GTI vehicles, as of October 26, 2019;
- 2019 MY Volkswagen Golf Sportwagen vehicles, as of August 28, 2019;
- 2019 MY Volkswagen Golf R vehicles, as of August 20, 2019
- 2019-2020 MY Volkswagen Jetta vehicles, as of October 24, 2019;
- 2019-2020 MY Volkswagen Jetta GLI vehicles, as of October 24, 2019;
- 2019 MY Volkswagen Tiguan vehicles, as of August 18, 2019;
- 2019-2020 MY Volkswagen Atlas vehicles, as of February 20, 2020;
- 2020 MY Volkswagen Atlas Cross Sport vehicles, as of July 25, 2019

Audi

- 2019-2020 MY Audi A3 vehicles, as of January 25, 2020
- 2019 MY Audi A3 Cabriolet vehicles, as of July 13, 2019
- 2019 MY Audi Q3 vehicles, as of July 31, 2019

Affected vehicles held at the factory have been corrected and unsold units in dealer inventory will be corrected prior to sale.

Additionally, Volkswagen is not aware of any field or customer complaints related to this condition, nor has it been made aware of any accidents or injuries that have occurred as a result of this issue.

Conclusion

For the forgoing reasons, Volkswagen submits that the subject noncompliance is inconsequential as it relates to motor vehicle safety and requests an exemption from the notification and remedy requirements of the Motor Vehicle Safety Act pursuant to 49 U.S.C. 30118(d) and associated regulations at 49 C.F.R. Part 556.

Please contact me if you require any additional information or have any questions related to this petition.

Sincerely,

Christopher T. Sandvig
Director, Group Customer Protection
VWGoA Group Quality

Part 573 Safety Recall Report

20V-253

Manufacturer Name : Volkswagen Group of America, Inc.

Submission Date : MAY 06, 2020

NHTSA Recall No. : 20V-253

Manufacturer Recall No. : 45i3, 45i4, 45i6



Manufacturer Information :

Manufacturer Name : Volkswagen Group of America, Inc.

Address : 3800 Hamlin Road

Auburn Hills MI 48326

Company phone : 1-800-893-5298

Population :

Number of potentially involved : 261,134

Estimated percentage with defect : 3 %

Vehicle Information :

Vehicle 1 : 2019-2020 Volkswagen Atlas

Vehicle Type :

Body Style :

Power Train : NR

Descriptive Information : "Vehicles included in the recall population were built with a specific hardware/software combination (brake control unit with related software) in a specific time frame. Vehicles not included in the recall have a different hardware and/or software level.

Atlas count: 73,844 (45i4)"

Production Dates : JAN 15, 2019 - FEB 19, 2020

VIN Range 1 : Begin : 1V2ER2CA2KC533186 **End :** 1V2TR2CA8LC505451 Not sequential

Vehicle 2 : 2020-2020 Volkswagen Atlas Cross Sport

Vehicle Type :

Body Style :

Power Train : NR

Descriptive Information : "Vehicles included in the recall population were built with a specific hardware/software combination (brake control unit with related software) in a specific time frame. Vehicles not included in the recall have a different hardware and/or software level.

Atlas Cross Sport count: 15 (45i4)"

Production Dates : DEC 04, 2018 - JUL 24, 2019

VIN Range 1 : Begin : 1V2GR2CA9LC500017 **End :** 1V2TE2CA9LC200164 Not sequential

Vehicle 3 : 2019-2019 Volkswagen Golf R

Vehicle Type :

Body Style :

Power Train : NR

Descriptive Information : "Vehicles included in the recall population were built with a specific hardware/software combination (brake control unit with related software) in a specific time frame. Vehicles not included in the recall have a different hardware and/or software level.

Golf R count: 5,345 (45i4)"

Production Dates : JAN 25, 2019 - AUG 19, 2019

VIN Range 1 : Begin : WVWWA7AU4KW102581 End : WVWVA7AU1KW230143 Not sequential

Vehicle 4 : 2019-2019 Volkswagen TIGUAN LWB

Vehicle Type :

Body Style :

Power Train : NR

Descriptive Information : "Vehicles included in the recall population were built with a specific hardware/software combination (brake control unit with related software) in a specific time frame. Vehicles not included in the recall have a different hardware and/or software level.

Tiguan LWB count: 81,140 (45i6)"

Production Dates : NOV 26, 2018 - AUG 10, 2019

VIN Range 1 : Begin : 3VV2B7AX9KM015881 End : 3VV2B7AX7KM200785 Not sequential

Vehicle 5 : 2019-2019 Volkswagen Jetta

Vehicle Type :

Body Style :

Power Train : NR

Descriptive Information : "Vehicles included in the recall population were built with a specific hardware/software combination (brake control unit with related software) in a specific time frame. Vehicles not included in the recall have a different hardware and/or software level.

Jetta count: 66,143 (45i6)"

Production Dates : NOV 26, 2018 - AUG 10, 2019

VIN Range 1 : Begin : 3VWG57BU1KM124445 End : 3VWCB7BU3KM242164 Not sequential

Vehicle 6 : 2019-2019 Volkswagen JETTA GLI

Vehicle Type :

Body Style :

Power Train : NR

Descriptive Information : "Vehicles included in the recall population were built with a specific hardware/software combination (brake control unit with related software) in a specific time frame. Vehicles not included in the recall have a different hardware and/or software level.

Jetta GLI count: 9,019 (45i6)"

Production Dates : DEC 17, 2018 - AUG 09, 2019

VIN Range 1 : Begin : 3VW6T7BU7KM135483 End : 3VW5T7BU5KM242110 Not sequential

Vehicle 7 : 2019-2019 Volkswagen GOLF SPORTWAGEN A7

Vehicle Type :

Body Style :

Power Train : NR

Descriptive Information : "Vehicles included in the recall population were built with a specific hardware/software combination (brake control unit with related software) in a specific time frame. Vehicles not included in the recall have a different hardware and/or software level.

Golf Sportwagen count: 3,548 (45i6)"

Production Dates : NOV 26, 2018 - AUG 08, 2019

VIN Range 1 : Begin : 3VW217AU8KM502705 End : 3VWY57AU8KM515551 Not sequential

Vehicle 8 : 2019-2019 Volkswagen GOLF GTI

Vehicle Type :

Body Style :

Power Train : NR

Descriptive Information : "Vehicles included in the recall population were built with a specific hardware/software combination (brake control unit with related software) in a specific time frame. Vehicles not included in the recall have a different hardware and/or software level.

Golf GTI count: 8,044 (45i6)"

Production Dates : NOV 26, 2018 - AUG 08, 2019

VIN Range 1 : Begin : 3VW5T7AU1KM005129 End : 3VW5T7AU5KM029868 Not sequential

Vehicle 9 : 2019-2019 Volkswagen GOLF ALLTRACK

Vehicle Type :

Body Style :

Power Train : NR

Descriptive Information : "Vehicles included in the recall population were built with a specific hardware/software combination (brake control unit with related software) in a specific time frame. Vehicles not included in the recall have a different hardware and/or software level.

Golf Alltrack count: 4,765 (45i6)"

Production Dates : NOV 26, 2018 - AUG 08, 2019

VIN Range 1 : Begin : 3VWH17AU7KM502690 End : 3VWH17AU5KM515549 Not sequential

Vehicle 10 : 2019-2019 Volkswagen GOLF A7

Vehicle Type :

Body Style :

Power Train : NR

Descriptive Information : "Vehicles included in the recall population were built with a specific hardware/software combination (brake control unit with related software) in a specific time frame. Vehicles not included in the recall have a different hardware and/or software level.

Golf A7 count: 3,348 (45i6)"

Production Dates : NOV 26, 2018 - AUG 08, 2019

VIN Range 1 : Begin : 3VWG57AU2KM006437 End : 3VWG57AU9KM029861 Not sequential

Vehicle 11 : 2019-2019 Audi Q3

Vehicle Type :

Body Style :

Power Train : NR

Descriptive Information : "Vehicles included in the recall population were built with a specific hardware/software combination (brake control unit with related software) in a specific time frame. Vehicles not included in the recall have a different hardware and/or software level.

Audi Q3 count: 5,923 (45i3)"

Production Dates : MAY 21, 2019 - JUL 30, 2019

VIN Range 1 : Begin : WA1FECF36K1056711 End : WA1EECF35K1088318 Not sequential

Description of Noncompliance :

Description of the Noncompliance : In a test environment, it was found that, in rare cases, the tire pressure monitoring system may not detect an air pressure loss in the time specified in the NHTSA FMVSS 138 Tire Pressure Monitoring Systems test procedure if it occurs simultaneously at the same rate in all four tires.

FMVSS 1 : 138 - Tire pressure monitoring systems

FMVSS 2 : NR

Description of the Safety Risk : VWGoA will be filing a petition for inconsequential non-compliance, because the issue with the TPMS system on the affected vehicles does not pose an unreasonable risk to motor vehicle safety. The behavior does not pose an unreasonable safety risk, as every puncture (meaning a rapid tire pressure loss), as well as a diffusion (meaning a long term pressure loss on multiple tires), will be detected. The pressure loss will still be detected in all cases, but in certain instances where all four tires deflate at the same rate at the same time, it may not be detected in the time specified in the FMVSS 138 test procedure. A pressure loss on less than four tires at the same time and rate will be detected and indicated to the driver. Warning for the driver will still occur in all cases before a potential safety-relevant tire pressure is reached.

Description of the Cause : The brake control unit hardware was changed, but the related module software was not adapted to the change. This may lead to a small deviation in the calculation of the current tire pressure.

Identification of Any Warning that can Occur : NONE

Involved Components :

Component Name 1 : NR

Component Description : NR

Component Part Number : NR

Supplier Identification :

Component Manufacturer

Name : Continental

Address : 1830 MacMillan Park Dr.

Fort Mill SOUTH CAROLINA 29707

Country : United States

Chronology :

Chronology attached as supplemental document due to NHTSA portal character count restrictions.

Description of Remedy :

Description of Remedy Program : Volkswagen will file a petition for inconsequential non-compliance. Therefore Volkswagen plans no reimbursement or remedy for sold vehicles. Unsold vehicles will get an updated software that addresses the potential non-compliance.

How Remedy Component Differs from Recalled Component : The remedy software addresses the non-compliance. The old software part numbers are:
AUDI: 5Q0.614.517.DS; 5Q0.614.517.DT; 5Q0.614.517.EB
VW:Part-No.: 5Q0.614.517.DS; 5Q0.614.517.DT; 5Q0.614.517.EB; 5Q0.614.517.EC

Identify How/When Recall Condition was Corrected in Production : Introduction of a new series software of the brake control unit
AUDI Q3: CW31/2019
VW Golf/GTI: in CW37/2019
VW Jetta/GLI: in CW38/2019
VW Tiguan LWB: in CW32/2019
VW Golf R: in CW21/2019
VW Atlas: in CW 09/2020

Recall Schedule :

Description of Recall Schedule : Dealers May 2020. Owner notification dependent on inconsequential petition review by the NHTSA.
Planned Dealer Notification Date : MAY 15, 2020 - MAY 15, 2020
Planned Owner Notification Date : NR - NR

* NR - Not Reported

Part 573 Safety Recall Report

20V-253

Manufacturer Name : Volkswagen Group of America, Inc.

Submission Date : MAY 15, 2020

NHTSA Recall No. : 20V-253

Manufacturer Recall No. : 45i3, 45i4, 45i6



Manufacturer Information :

Population :

Manufacturer Name : Volkswagen Group of America, Inc.

Number of potentially involved : 299,043

Address : 3800 Hamlin Road

Estimated percentage with defect : 3 %

Auburn Hills MI 48326

Company phone : 1-800-893-5298

Vehicle Information :

Vehicle 1 : 2019-2020 Volkswagen Atlas

Vehicle Type :

Body Style :

Power Train : NR

Descriptive Information : "Vehicles included in the recall population were built with a specific hardware/software combination (brake control unit with related software) in a specific time frame. Vehicles not included in the recall have a different hardware and/or software level.

Atlas count: 73,856 (45i4)"

Production Dates : DEC 04, 2018 - FEB 19, 2020

VIN Range 1 : Begin : 1V2GR2CA9LC500017 **End :** 1V2TR2CA8LC505451 Not sequential

Vehicle 2 : 2020-2020 Volkswagen Atlas Cross Sport

Vehicle Type :

Body Style :

Power Train : NR

Descriptive Information : "Vehicles included in the recall population were built with a specific hardware/software combination (brake control unit with related software) in a specific time frame. Vehicles not included in the recall have a different hardware and/or software level.

Atlas Cross Sport count: 12 (45i4)"

Production Dates : APR 19, 2019 - JUL 24, 2019

VIN Range 1 : Begin : 1V2EC2CA8LC200087 **End :** 1V2TE2CA9LC200164 Not sequential

Vehicle 3 : 2019-2019 Volkswagen Golf R

Vehicle Type :

Body Style :

Power Train : NR

Descriptive Information : "Vehicles included in the recall population were built with a specific hardware/software combination (brake control unit with related software) in a specific time frame. Vehicles not included in the recall have a different hardware and/or software level.

Golf R count: 5,345 (45i4)"

Production Dates : JAN 25, 2019 - AUG 19, 2019

VIN Range 1 : Begin : WVWWA7AU4KW102581 End : WVWVA7AU1KW230143 Not sequential

Vehicle 4 : 2019-2019 Volkswagen TIGUAN LWB

Vehicle Type :

Body Style :

Power Train : NR

Descriptive Information : "Vehicles included in the recall population were built with a specific hardware/software combination (brake control unit with related software) in a specific time frame. Vehicles not included in the recall have a different hardware and/or software level.

Tiguan LWB count: 81,732 (45i6)"

Production Dates : NOV 26, 2018 - AUG 17, 2019

Vehicle 5 : 2019-2020 Volkswagen Jetta NF

Vehicle Type :

Body Style :

Power Train : NR

Descriptive Information : "Vehicles included in the recall population were built with a specific hardware/software combination (brake control unit with related software) in a specific time frame. Vehicles not included in the recall have a different hardware and/or software level.

Jetta count: 85,285 (45i6)"

Production Dates : NOV 26, 2018 - OCT 23, 2019

VIN Range 1 : Begin : 3VWG57BU1KM124445 End : 3VWEB7BU6KM273952 Not sequential

Vehicle 6 : 2019-2020 Volkswagen JETTA GLI

Vehicle Type :

Body Style :

Power Train : NR

Descriptive Information : "Vehicles included in the recall population were built with a specific hardware/software combination (brake control unit with related software) in a specific time frame. Vehicles not included in the recall have a different hardware and/or software level.

Jetta GLI count:10,891 (45i6)"

Production Dates : DEC 17, 2018 - OCT 23, 2019

VIN Range 1 : Begin : 3VW6T7BU7KM135483 End : 3VW5T7BU5KM272515 Not sequential

Vehicle 7 : 2019-2019 Volkswagen GOLF SPORTWAGEN A7

Vehicle Type :

Body Style :

Power Train : NR

Descriptive Information : "Vehicles included in the recall population were built with a specific hardware/software combination (brake control unit with related software) in a specific time frame. Vehicles not included in the recall have a different hardware and/or software level.

Golf Sportwagen count: 3,693 (45i6)"

Production Dates : NOV 26, 2018 - AUG 27, 2019

VIN Range 1 : Begin : 3VW217AU8KM502705 End : 3VWY57AUXKM516426 Not sequential

Vehicle 8 : 2019-2019 Audi Q3

Vehicle Type :

Body Style :

Power Train : NR

Descriptive Information : "Vehicles included in the recall population were built with a specific hardware/software combination (brake control unit with related software) in a specific time frame. Vehicles not included in the recall have a different hardware and/or software level.

Audi Q3 count: 5,922 (45i3)"

Production Dates : MAY 21, 2019 - JUL 30, 2019

VIN Range 1 : Begin : WA1FECF36K1056711 End : WA1EECF35K1088318 Not sequential

Vehicle 9 : 2019-2020 Volkswagen GOLF GTI

Vehicle Type :

Body Style :

Power Train : NR

Descriptive Information : "Vehicles included in the recall population were built with a specific hardware/software combination (brake control unit with related software) in a specific time frame. Vehicles not included in the recall have a different hardware and/or software level.

Golf GTI count:11,368 (45i6)"

Production Dates : NOV 26, 2018 - OCT 25, 2019

VIN Range 1 : Begin : 3VW5T7AU1KM005129 End : 3VW6T7AU3KM038234 Not sequential

Vehicle 10 : 2019-2019 Volkswagen GOLF ALLTRACK

Vehicle Type :

Body Style :

Power Train : NR

Descriptive Information : "Vehicles included in the recall population were built with a specific hardware/software combination (brake control unit with related software) in a specific time frame. Vehicles not included in the recall have a different hardware and/or software level.

Golf Alltrack count: 8,313 (45i6)"

Production Dates : NOV 26, 2018 - OCT 25, 2019

VIN Range 1 : Begin : 3VWH17AU7KM502690 End : 3VWM17AU4KM521423 Not sequential

Vehicle 11 : 2019-2020 Volkswagen GOLF A7

Vehicle Type :

Body Style :

Power Train : NR

Descriptive Information : "Vehicles included in the recall population were built with a specific hardware/software combination (brake control unit with related software) in a specific time frame. Vehicles not included in the recall have a different hardware and/or software level.

Golf A7 count: 5,250 (45i6)"

Production Dates : NOV 26, 2018 - OCT 25, 2019

VIN Range 1 : Begin : 3VWG57AU2KM006437 End : 3VWG57AU5KM038203 Not sequential

Vehicle 12 : 2019-2020 Audi A3 Sedan

Vehicle Type :

Body Style :

Power Train : NR

Descriptive Information : "Vehicles included in the recall population were built with a specific hardware/software combination (brake control unit with related software) in a specific time frame. Vehicles not included in the recall have a different hardware and/or software level.

A3 Sedan count: 6,514 (45i3)"

Production Dates : NOV 26, 2018 - JAN 24, 2020

VIN Range 1 : Begin : WAUJEGFF3K1016357 End : WAUBEGFF4LA000514 Not sequential

Vehicle 13 : 2019-2019 Audi A3 Cabriolet

Vehicle Type :

Body Style :

Power Train : NR

Descriptive Information : "Vehicles included in the recall population were built with a specific hardware/software combination (brake control unit with related software) in a specific time frame. Vehicles not included in the recall have a different hardware and/or software level.

A3 Cabriolet count: 862(45i3)"

Production Dates : NOV 26, 2018 - JUL 12, 2019

VIN Range 1 : Begin : WAUYELFF6K1016439 End : WAU6ULFF9K1033102 Not sequential

Description of Noncompliance :

Description of the Noncompliance : In a test environment, in rare cases, the tire pressure monitoring system may not detect an air pressure loss in the time specified in the NHTSA FMVSS 138 Tire Pressure Monitoring Systems test procedure if it occurs simultaneously at the same rate in all four tires.

FMVSS 1 : 138 - Tire pressure monitoring systems

FMVSS 2 : NR

Description of the Safety Risk : VWGoA will be filing a petition for inconsequential non-compliance, because the issue with the TPMS system on the affected vehicles does not pose an unreasonable risk to motor vehicle safety. The behavior does not pose an unreasonable safety risk, as every puncture (meaning a rapid tire pressure loss), as well as a diffusion (meaning a long term pressure loss on multiple tires), will be detected. The pressure loss will still be detected in all cases, but in certain instances where all four tires deflate at the same rate at the same time, it may not be detected in the time specified in the FMVSS 138 test procedure. A pressure loss on less than four tires at the same time and rate

Description of the Cause : will be detected and indicated to the driver. Warning for the driver will still occur in all cases before a potential safety-relevant tire pressure is reached. The brake control unit hardware was changed, but the related module software was not adapted to the change. This may lead to a small deviation in the calculation of the current tire pressure.

Identification of Any Warning that can Occur : NONE

Involved Components :

Component Name 1 : NR

Component Description : NR

Component Part Number : NR

Supplier Identification :

Component Manufacturer

Name : Continental

Address : 1830 MacMillan Park Dr.
Fort Mill SOUTH CAROLINA 29707

Country : United States

Chronology :

Chronology attached as supplemental document due to NHTSA portal character count restrictions.

Description of Remedy :

Description of Remedy Program : Volkswagen will file a petition for inconsequential non-compliance. Therefore Volkswagen plans no reimbursement or remedy for sold vehicles. Unsold vehicles will get an updated software that addresses the potential non-compliance.

How Remedy Component Differs : The remedy software addresses the non-compliance. The old software part numbers are:

from Recalled Component : AUDI: 5Q0.614.517.DS; 5Q0.614.517.DT; 5Q0.614.517.EB
VW:Part-No.: 5Q0.614.517.DS; 5Q0.614.517.DT; 5Q0.614.517.EB;
5Q0.614.517.EC

Identify How/When Recall Condition was Corrected in Production : Introduction of a new series software of the brake control unit
AUDI: CW31/2019
VW: CW33/2019 (Tiguan LWB), CW44/2019 (Golf, GTI), CW44/2019 (Jetta, GLI), CW20/2019 (R Golf), CW08/2020 (Atlas)

Recall Schedule :

Description of Recall Schedule : Dealers May 2020. Owner notification dependent on inconsequential petition review by the NHTSA.
Planned Dealer Notification Date : MAY 15, 2020 - MAY 15, 2020
Planned Owner Notification Date : NR - NR

* NR - Not Reported