

# 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 110  
2019-2020 Model Year Audi A6, A7 and  
2020 Model Year Audi A6 Allroad  
Incorrect Tire Placard Label

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

Dear Mr. Owens:

On May 20, 2020, Volkswagen Group of America, Inc. (Volkswagen) notified the National Highway Traffic Safety Administration (NHTSA) that it had determined that a noncompliance under Federal Motor Vehicle Safety Standard (FMVSS) No. 110, Tire selection and Rims, existed in a number of 2019-2020 model year (MY) Audi A6, A7 and 2020 MY Audi A6 Allroad vehicles which are not equipped with a spare tire.

Under separate cover, Volkswagen is submitting 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 any noncompliant vehicles. Pursuant to 49 U.S.C. 30118(d) and associated regulations at 49 C.F.R. Part 556, Volkswagen now petitions for exemption from the notification and remedy requirements of the Motor Vehicle Safety Act on the grounds that the condition at issue is inconsequential as it relates 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.

### **Noncompliant Condition**

The 2019-2020 MY Audi A6, A7 and 2020 MY Audi A6 Allroad vehicles are not equipped with a spare tire. The required Tire Placard Label, located on the driver's side B-Pillar, was misprinted and does not contain the word "none" in the cold tire inflation pressure location for spare tire, as required under 49 C.F.R. Part 571.110 S4.3 (c). As the vehicle is not equipped with a spare tire, there is no actual effect on drivability, vehicle safety or tire wear.

### **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 652 vehicles of the following Volkswagen models:

- 2019-2020 MY Audi A6 vehicles not equipped with a spare tire built between September 25, 2018 and May 14, 2020
- 2019-2020 MY Audi A7 vehicles, not equipped with a spare tire built between September 24, 2018 and May 14, 2020
- 2020 MY Audi A6 Allroad vehicles, not equipped with a spare tire built between November 14, 2019 and May 14, 2020

### **Inconsequentiality of Non-compliance**

Volkswagen submits that the condition described above is inconsequential as it relates to motor vehicle safety because the information misprinted on the Tire Placard Label is applicable to a component (spare tire) which is not equipped in the vehicle. There is no effect on drivability, vehicle safety or tire wear.

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

- 2019-2020 MY Audi A6 vehicles, as of May 15, 2020
- 2019-2020 MY Audi A7 vehicles, as of May 15, 2020
- 2020 MY Audi A6 Allroad vehicles, as of May 15, 2020

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 reason, 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-287

**Manufacturer Name :** Volkswagen Group of America, Inc.**Submission Date :** MAY 20, 2020**NHTSA Recall No. :** 20V-287**Manufacturer Recall No. :** 44Q1**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 : 652

Estimated percentage with defect : 100 %

**Vehicle Information :**

Vehicle 1 : 2019-2020 Audi A6

Vehicle Type :

Body Style :

Power Train : NR

Descriptive Information : "The recall population was determined based upon production records that identified certain vehicles with a specific option code that did not add a spare tire to the vehicle. Vehicles not in the recall differ from those in the recall because those not in the recall were manufactured with a spare tire or have already received an updated label. A6 vehicle count: 227"

Production Dates : SEP 28, 2018 - MAY 14, 2020

VIN Range 1 : Begin : WAUM2AF26KN031380 End : WAUFFAF27LN087519  Not sequential

Vehicle 2 : 2019-2020 Audi A7

Vehicle Type :

Body Style :

Power Train : NR

Descriptive Information : "The recall population was determined based upon production records that identified certain vehicles with a specific option code that did not add a spare tire to the vehicle. Vehicles not in the recall differ from those in the recall because those not in the recall were manufactured with a spare tire or have already received an updated label. A7 vehicle count: 406"

Production Dates : SEP 24, 2018 - MAY 14, 2020

VIN Range 1 : Begin : WAUV2AF28KN029134 End : WAUSFAF29LN087553  Not sequential

Vehicle 3 : 2020-2020 Audi A6 allroad

Vehicle Type :

Body Style :

Power Train : NR

Descriptive Information : "The recall population was determined based upon production records that identified certain vehicles with a specific option code that did not add a spare tire to the vehicle. Vehicles not in the recall differ from those in the recall because those not in the recall were manufactured with a spare tire or have already received an updated label.  
A6 allroad vehicle count: 19"

Production Dates : NOV 14, 2019 - MAY 14, 2020

VIN Range 1 : Begin : WAU92BF29LN041110 End : WAU92BF21LN084954  Not sequential

## Description of Noncompliance :

Description of the Noncompliance : The tire information label (located on the driver's side B-pillar) was incorrectly printed to include information for a spare tire that is not present in the affected vehicles. The vehicles are not equipped with a spare tire but the label does not contain the word "none" in the tire inflation pressure section for the spare tire.

FMVSS 1 : 110 - Tire selection and rims

FMVSS 2 : NR

Description of the Safety Risk : There is no safety risk and no effect on driveability or tire wear as the vehicles are not equipped with a spare tire. Audi will submit a petition for inconsequential noncompliance.

Description of the Cause : The majority of vehicles in the U.S. are equipped with a spare tire; however, on vehicles equipped with a certain sound system, there is no room for a spare tire. Due to an internal error, this situation was not considered when the tire information labels were created for the affected vehicles.

Identification of Any Warning that can Occur : NONE

## Involved Components :

Component Name 1 : Tire Information Label

Component Description : Tire Information Label

Component Part Number : 4K0 010 502

## Supplier Identification :

### Component Manufacturer

Name : AUDI AG  
Address : NR  
FOREIGN STATES  
Country : Germany

## Chronology :

"February 26, 2020: Canadian market reports to have identified some vehicles that were not equipped with a spare tire but their tire information label included tire pressure and tire size information on the tire label.  
February 28, 2020: US market also reports to have identified vehicles that were not equipped with a spare tire but had a tire pressure information label displaying information for the spare tire. The responsible departments started investigating immediately.  
March 2020: Issue reported to the Audi Product Safety Committee.  
April 2020: Topic presented and discussed at the Audi Product Safety Committee. Further investigation regarding affected population and root cause.  
May 13, 2020: The Audi Product Safety committee determines that the affected vehicles do not comply with FMVSS 110 and decides to file a petition for inconsequential noncompliance as there is no risk to motor vehicle safety."

## Description of Remedy :

Description of Remedy Program : Audi will submit a petition for inconsequential noncompliance because the misprinted tire information label is applicable to a component (spare tire) which is not present in the affected vehicles. Unsold vehicles will receive a new, correct label before being delivered to customers. Audi will not offer a reimbursement program under this recall.

How Remedy Component Differs from Recalled Component : "New tire tire information labels will display the word ""NONE"" in the tire inflation pressure section for the spare tire.  
Part number of the label:  
4K0 010 502"

Identify How/When Recall Condition was Corrected in Production : In May 2020, production was changed and the correct tire information labels are being used. However, due to COVID-19-related production delays, some vehicles before that production date change may not have reached their final checkpoint in production. Audi will assure that all vehicles receive the correct label before being made available for retail sale.

**Recall Schedule :**

Description of Recall Schedule : Dealers - on or before 07/17/2020. Owners -pending agency review of inconsequential noncompliance petition.

Planned Dealer Notification Date : JUL 17, 2020 - JUL 17, 2020

Planned Owner Notification Date : NR - NR

\* NR - Not Reported