

**2019 MID-MODEL YEAR CORPORATE AVERAGE FUEL  
ECONOMY REPORT**

**DOMESTIC PASSENGER AUTOMOBILES**

**VOLKSWAGEN GROUP OF AMERICA, INC.**

**July 2019**

## VOLKSWAGEN GROUP

### 2019 MID-MODEL YEAR CORPORATE AVERAGE FUEL ECONOMY REPORT

#### DOMESTIC PASSENGER AUTOMOBILES

#### MANUFACTURERS AVERAGE CALCULATION

Calculate fuel economy average of domestically produced automobiles  
where:

$$\text{Average MPG} = \frac{1}{\left[ \frac{1}{\text{MPG}} - (\text{FCIV}_{\text{AC}} + \text{FCIV}_{\text{OC}} + \text{FCIV}_{\text{PU}}) \right]}$$

Average MPG = the fleet average fuel economy for a category of vehicles;

MPG = the average fuel economy for a category of vehicles

FCIV<sub>AC</sub> = Air conditioning fuel economy credits for a category of vehicles, in gallons per mile.

FCIV<sub>OC</sub> = Off-cycle technology fuel economy credits for a category of vehicles, in gallons per mile.

FCIV<sub>PU</sub> = Pickup truck fuel economy credits for the light truck category, in gallons per mile.

Note: Volkswagen Group of America intends to claim off-cycle credits in the future, impacting the final CAFE calculation.

	MY 2019 Domestic
MPG	39.6
FCIV <sub>AC</sub>	0.0007631847
FCIV <sub>OC</sub>	0.000406956
FCIV <sub>PU</sub>	0
ACCredit	18,553
VLM	195,264
Production	14,009
OCCredit	9,893
Average MPG	41.5

Fleet Standard	41.1
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Brand	Carline	Engine	DISP	Transmission	IW	ETW	FE CITY	CITY	Formula	FE HWY	HWY	Formula	MT/FE COMB	COMB	Confidential Sales	Weighted Sales/MPG
Volkswagen	Passat	2.0L	2.0L/121	S6	3625	3500	32.8000	32.8	427.1	53.0000	53.0	264.3208	39.5901	39.6	14,009	353.7626

Volkswagen Group Total Units	14,009	
Unrounded Fleet Average (MPG)	39.6000	353.7626
Rounded Fleet Average (MPG)	39.6	
Volkswagen Group Fleet Average CAFÉ w/ Average FE Improvement (MPG)	1.9	
Volkswagen Group Fleet Average CAFÉ w/FE Improvement (MPG)	41.5	

MY 2019 Domestic	
MPG	39.6
FCIV <sub>AC</sub>	0.0007631847
FCIV <sub>OC</sub>	0.000406956
FCIV <sub>PU</sub>	0
ACCredit	18,553
VLM	195,264
Production	14,009
OCCredit	9,893
Average MPG	41.5

# VOLKSWAGEN

GROUP OF AMERICA

Ms. Heidi King  
Deputy Administrator  
National Highway Traffic Safety Administration  
1200 New Jersey Ave. SW  
Washington, D.C. 20590

Sashi Velnati	Name
Mgr Compliance Reporting	Title
EEO	Department
248-754-4848	Phone
248-754-4207	Fax
Sashi.Velnati@vw.com	E-Mail

July 26, 2019 Date

Subject: 2019 Mid-Model Year Corporate Average Fuel Economy Report for  
Volkswagen Group Import Passenger Automobiles (CBI)

VOLKSWAGEN GROUP OF AMERICA, INC.  
3800 HAMLIN ROAD  
AUBURN HILLS, MI 48326

Dear Ms. King,

Attached is the 2019 Volkswagen Group of America, Inc. Mid-Model Year Corporate Average Fuel Economy Report for Import Passenger Automobiles. This report has been prepared in accordance with the provisions of Title 40 Part 600.510-12 Code of Federal Regulations. A [REDACTED] request has been submitted to the NHTSA, Office of the Chief Counsel for the projected sales volumes and specific vehicle design information omitted from this submission. Disclosure of information identified as [REDACTED] from this report would cause substantial competitive harm.

Please contact me at (248) 754-4848, if you have any comments or questions related to this report.

Sincerely,



Sashi Velnati  
Engineering and Environmental Office

CC: Byron Bunker, Director  
U.S. EPA, Compliance Division

Enclosure

**2019 MID-MODEL YEAR CORPORATE AVERAGE FUEL  
ECONOMY REPORT**

**IMPORT PASSENGER AUTOMOBILES**

**VOLKSWAGEN GROUP OF AMERICA, INC.**

**July 2019**

## VOLKSWAGEN GROUP

### 2019 MID-MODEL YEAR CORPORATE AVERAGE FUEL ECONOMY REPORT

#### IMPORT PASSENGER AUTOMOBILES

#### MANUFACTURERS AVERAGE CALCULATION

**Calculate fuel economy average of imported automobiles where:**

$$\text{Average MPG} = \frac{1}{\left[ \frac{1}{\text{MPG}} - \text{FCIV}_{AC} + \text{FCIV}_{OC} + \text{FCIV}_{PU} \right]}$$

Average MPG = the fleet average fuel economy for a category of vehicles;

MPG = the average fuel economy for a category of vehicles

FCIV<sub>AC</sub> = Air conditioning fuel economy credits for a category of vehicles, in gallons per mile.

FCIV<sub>OC</sub> = Off-cycle technology fuel economy credits for a category of vehicles, in gallons per mile.

FCIV<sub>PU</sub> = Pickup truck fuel economy credits for the light truck category, in gallons per mile.

**Note:** Volkswagen Group of America intends to claim off-cycle credits in the future, impacting the final CAFE calculation.

	MY 2019 PG
MPG	39.2
FCIV <sub>AC</sub>	0.00062337254
FCIV <sub>OC</sub>	0.00030066830
FCIV <sub>PU</sub>	0
ACCredit	374,828
VLM	195,264
Production	346,503
PUCredit	0
Average MPG	40.7

Fleet Standard	42.7
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VWGoA  
Engineering and Environmental Office  
July 2019

	Brand	Carline	Engi ne	DISP	Transm.	IW	ETW	FE CITY	CITY	Formula	FE HWY	HWY	Formula	MT FE COMB	COMB	Confidential Sales	Weighted Sales/MPG
Audi	Audi	A3	2.0L	2.0L / 121	AMS-7	3500	3500	32.1190	32.1	119.2	49.0302	49.0	78.0816	38.0202	38.0	3,826	100.6842
	Audi	A3 Cabriolet	2.0L	2.0L / 121	AMS-7	3500	3750	32.1190	32.1	11.2	49.0302	49.0	7.3673	38.0202	38.0	381	9.5000
	Audi	A3 Cabriolet quattro	2.0L	2.0L / 121	AMS-7	4000	4000	28.0000	28.0	19.0	42.5000	42.5	12.5412	33.0785	33.1	153	16.1027
	Audi	A3 quattro	2.0L	2.0L / 121	AMS-7	3500	3750	27.3996	27.4	113.4	42.5000	42.5	73.0824	32.6142	32.6	3,106	95.2761
	Audi	A4	2.0L	2.0L / 121	AMS-7	4000	3875	35.3955	35.4	256.5	50.3000	50.3	180.5169	40.8413	40.8	9,080	222.5490
	Audi	A4 allroad quattro	2.0L	2.0L / 121	AMS-7	4000	4250	27.9986	28.0	65.3	41.0000	41.0	44.5610	32.6590	32.7	1,827	55.8716
	Audi	A4 quattro	2.0L	2.0L / 121	AMS-7	4000	4000	30.3988	30.4	584.2	46.1393	46.1	385.2711	35.9119	35.9	17,761	494.7354
	Audi	A5 Cabriolet quattro	2.0L	2.0L / 121	AMS-7	4000	4000	30.3988	30.4	123.1	46.1393	46.1	81.1931	35.9119	35.9	3,743	104.2618
	Audi	A5 quattro	2.0L	2.0L / 121	AMS-7	4000	4000	30.3988	30.4	93.7	46.1393	46.1	61.7787	35.9119	35.9	2,848	79.3315
	Audi	A5 Sportback quattro	2.0L	2.0L / 121	AMS-7	4000	4000	30.3988	30.4	366.8	46.1393	46.1	241.8655	35.9119	35.9	10,150	310.5850
	Audi	A6 quattro	2.0L	2.0L / 121	S8	4000	4250	31.1000	31.1	122.4	45.6000	45.6	83.5088	36.2933	36.3	3,808	104.9036
	Audi	A6 quattro	3.0L	3.0L / 183	S8	4500	4750	28.0707	28.1	521.2	40.9574	41.0	357.2195	32.7007	32.7	14,646	447.8899
	Audi	A7 quattro	3.0L	3.0L / 183	AMS-7	4500	4750	28.0707	28.1	215.3	40.9574	41.0	147.5366	32.7007	32.7	6,049	184.9847
	Audi	A8L	3.0L	3.0L / 183	S8	5000	5000	23.6000	23.6	178.1	38.6000	38.6	108.8601	28.6016	28.6	4,202	146.9231
	Audi	A8L	4.0L	4.0L / 244	S8	5000	5000	19.5000	19.5	12.8	31.6000	31.6	7.9114	23.5595	23.6	250	10.5932
	Audi	R53	2.5L	2.5L / 153	AMS-7	4000	3875	23.2000	23.2	57.2	39.3000	39.3	33.7659	28.4436	28.4	1,327	46.7254
	Audi	R55 Coupe	2.9L	2.9L / 177	S8	4000	4250	21.5000	21.5	48.9	36.8000	36.8	28.5598	26.4483	26.4	1,051	39.8106
	Audi	R55 Sportback	2.9L	2.9L / 177	S8	4500	4500	21.4000	21.4	135.5	37.0000	37.0	78.3514	26.4109	26.4	2,899	109.8106
	Audi	S3	2.0L	2.0L / 121	AMS-7	3875	4000	27.0000	27.0	30.7	40.9000	40.9	20.2689	31.8747	31.9	829	25.9875
	Audi	S4	3.0L	3.0L / 183	S8	4000	4250	26.4260	26.4	124.4	42.2521	42.3	77.6123	31.7832	31.8	3,283	103.2390
	Audi	S5	3.0L	3.0L / 183	S8	4000	4250	26.4260	26.4	49.1	42.2521	42.3	30.6147	31.7832	31.8	1,295	40.7233
	Audi	S5 Cabriolet	3.0L	3.0L / 183	S8	4500	4500	26.2000	26.2	46.8	41.0000	41.0	29.9268	31.2813	31.3	1,227	39.2013
	Audi	S5 Sportback	3.0L	3.0L / 183	S8	4000	4250	26.4260	26.4	139.1	42.2521	42.3	86.7849	31.7832	31.8	3,671	115.4403
	Audi	TT Coupe quattro	2.0L	2.0L / 121	AMS-7	3500	3500	28.0682	28.1	12.7	42.2652	42.3	8.4634	33.0664	33.1	358	10.8157
	Audi	TT Roadster quattro	2.0L	2.0L / 121	AMS-7	3500	3750	28.0682	28.1	9.6	42.2652	42.3	6.3593	33.0664	33.1	269	8.1289
	Audi	TT RS	2.5L	2.5L / 153	AMS-7	3500	3625	24.1000	24.1	15.6	38.7000	38.7	9.7158	29.0280	29.0	876	12.9555
	Audi	TT5 Coupe	2.0L	2.0L / 121	AMS-7	3500	3625	28.5000	28.5	10.0	39.8000	39.8	7.1357	32.6746	32.7	284	8.6850
Bentley	Bentley	Mulsanne	6.8L	6.8L / 415	S8	6500	6500	11.2000	11.2	5.2	20.8000	20.8	2.7885	14.1359	14.1	58	4.1135
	Bugatti	Chiron	8.0L	8.0L / 488	S8	4500	4750	10.4000	10.4	0.8	18.2000	18.2	0.4396	12.8850	12.9	8	0.6202
Lamborghini	Lamborghini	Aventador Coupe	6.5L	6.5L / 396	S7	4500	4500	10.7833	10.8	0.5	19.7751	19.8	0.2525	13.5574	13.6	5	0.3676
	Lamborghini	Aventador Roadster	6.5L	6.5L / 396	S7	4500	4500	10.6000	10.6	4.4	19.5000	19.5	2.4103	13.3398	13.3	47	3.5338
	Lamborghini	Aventador SVJ Coupe	6.5L	6.5L / 396	S7	4000	4250	10.7833	10.8	5.2	19.7751	19.8	2.8283	13.5574	13.6	56	4.1176
	Lamborghini	Huracan Coupe (AWD)	5.2L	5.2L / 303	AMS7	3875	4000	15.7751	15.8	0.2	24.4203	24.4	0.1230	18.7644	18.8	78	0.1596
	Lamborghini	Huracan Performante Coupe	5.2L	5.2L / 304	AMS7	3875	4000	15.7751	15.8	2.3	24.4203	24.4	1.5164	18.7644	18.8	37	1.9681
	Lamborghini	Huracan Coupe RWD	6.5L	6.5L / 396	S7	3875	4000	15.8884	15.9	4.8	23.3199	23.3	3.3047	18.5483	18.5	77	4.1522
	Lamborghini	Huracan Spyder (AWD)	5.2L	5.2L / 303	AMS7	4000	4250	15.7751	15.8	0.1	24.4203	24.4	0.0820	18.7644	18.8	24	0.1064
	Lamborghini	Huracan Performante Spyder	5.2L	5.2L / 303	AMS7	4000	4250	15.7751	15.8	4.3	24.4203	24.4	2.7869	18.7644	18.8	68	3.6170
	Lamborghini	Huracan Spyder RWD	6.5L	6.5L / 396	S7	4000	4250	15.8884	15.9	6.0	23.3199	23.3	4.1202	18.5483	18.5	96	5.1892
Volkswagen	Volkswagen	Golf Alltrack	1.8L	1.8L / 110	AMS-6	3500	3750	27.7000	27.7	205.7	41.9000	41.9	135.9666	32.6846	32.7	5,697	174.2202
	Volkswagen	Golf Alltrack	1.8L	1.8L / 110	M6	3500	3750	27.0000	27.0	147.6	43.0000	43.0	92.6512	32.4302	32.4	3,984	122.9630
	Volkswagen	Arteon	2.0L	2.0L / 121	S8	4000	4000	26.7230	26.7	43.3	42.1991	42.2	27.3697	32.0049	32.0	1,155	36.0938
	Volkswagen	Arteon 4Motion	2.0L	2.0L / 121	S8	4000	4250	24.8000	24.8	122.1	39.0000	39.0	77.6667	29.6596	29.7	3,029	101.9865
	Volkswagen	Beetle	2.0L	2.0L / 121	S6	3375	3500	32.2899	32.3	196.3	48.5688	48.6	130.4938	38.0251	38.0	1,634	166.8947
	Volkswagen	Beetle Convertible	2.0L	2.0L / 121	S6	3500	3500	32.2899	32.3	239.0	48.5688	48.6	158.8272	38.0251	38.0	7,719	203.1316
	Volkswagen	e-Golf	0.0L	-	E1	3750	3500	431.0000	431.0	10.3	380.4000	380.4	11.7	406.7000	406.7	453	10.9491
	Volkswagen	Golf	1.4L	1.4L / 85	M6	3000	3250	35.3295	35.3	21.3	53.3459	53.3	14.1	41.6611	41.7	751	18.0096
	Volkswagen	Golf	1.4L	1.4L / 85	S8	3000	3250	38.2000	38.2	101.6	53.5000	53.5	72.6	43.8421	43.8	3,882	88.6301

Volkswagen	Golf R	2.0L	2.0L / 121	AMS-7	3500	3750	28.8000	28.8	127.4	41.9000	41.9	87.5418	38.5153	33.5	3,668	109.4925
	Golf R	2.0L	2.0L / 121	M6	3500	3625	24.8000	24.8	102.1	37.6000	37.6	67.3138	29.2864	29.3	2,531	86.3823
	Golf Sportwagen	1.4L	1.4L / 85	M6	3000	3250	35.3295	35.3	8.7	53.3459	53.3	5.7411	41.6611	41.7	306	7.3381
	Golf Sportwagen	1.4L	1.4L / 85	S8	3500	3500	35.9000	35.9	75.3	52.9000	52.9	51.1153	41.9693	42.0	2,704	64.3810
	Golf Sportwagen 4Motion	1.8L	1.8L / 110	AMS-6	3500	3625	27.2000	27.2	48.5	41.0000	41.0	32.1707	32.0552	32.1	3,319	41.0903
	Golf Sportwagen 4Motion	1.8L	1.8L / 110	M6	3500	3625	26.5000	26.5	27.6	41.9000	41.9	17.4702	31.7515	31.8	782	23.0189
	GTI	2.0L	2.0L / 121	M6	3500	3500	28.8000	28.8	194.3	44.2000	44.2	126.6063	34.1551	34.2	5,586	163.6257
	GTI	2.0L	2.0L / 121	AMS-7	3500	3500	30.8000	30.8	209.4	44.2000	44.2	145.9502	35.6657	35.7	6,481	180.7009
	Jetta	1.4L	1.4L / 85	M6	3250	3000	37.3499	37.3	274.4	59.3000	59.3	172.5801	44.8147	44.8	10,234	228.4375
	Jetta	1.4L	1.4L / 85	S8	3375	3500	38.9283	38.9	3,790.3	59.4503	59.5	2,478.0000	46.0874	46.1	147,441	3,198.2863
	Jetta GLI	2.0L	2.0L / 121	AMS-7	3500	3625	31.3000	31.3	197.4	45.9000	45.9	134.6405	36.5286	36.5	6,180	169.3151
	Jetta GLI	2.0L	2.0L / 121	M6	3500	3625	30.2000	30.2	147.3	46.4000	46.4	95.8405	35.8292	35.8	4,447	124.2179
Porsche	911 Carrera	3.0L	3.0L / 183	M7	3500	3625	25.1000	25.1	4.5	41.6000	41.6	2.6923	30.5533	30.6	112	3.6601
	911 Carrera	3.0L	3.0L / 184	AMS-7	3500	3625	28.2000	28.2	13.6	42.2000	42.2	9.0995	33.1487	33.1	384	11.6012
	911 Carrera Cabriolet	3.0L	3.0L / 185	M7	3500	3750	24.7000	24.7	3.4	40.8000	40.8	2.0833	30.0331	30.0	85	2.8333
	911 Carrera Cabriolet	3.0L	3.0L / 186	AMS-7	3500	3750	27.6000	27.6	8.9	40.4000	40.4	5.0891	32.1894	32.2	246	7.6398
	911 Carrera S	3.0L	3.0L / 187	M7	3500	3625	24.6000	24.6	2.4	40.6000	40.6	1.4778	29.9030	29.9	60	2.0067
	911 Carrera S	3.0L	3.0L / 188	AMS-7	3500	3750	27.8000	27.8	6.9	40.4000	40.4	4.7525	32.3386	32.3	192	5.9443
	911 Carrera S Cabriolet	3.0L	3.0L / 189	M7	3500	3750	24.6000	24.6	2.4	40.1000	40.1	1.4963	29.7799	29.8	60	2.0134
	911 Carrera S Cabriolet	3.0L	3.0L / 190	AMS-7	3500	3750	27.6000	27.6	8.3	39.9000	39.9	5.7143	32.0454	32.0	228	7.1250
	911 Carrera 4	3.0L	3.0L / 191	M7	3500	3750	24.6000	24.6	0.6	40.4000	40.4	0.3465	29.8540	29.9	14	0.4682
	911 Carrera 4	3.0L	3.0L / 192	AMS-7	3500	3750	28.0000	28.0	1.1	40.4000	40.4	0.7921	32.4871	32.5	32	0.9846
	911 Carrera 4 Cabriolet	3.0L	3.0L / 193	M7	4000	3875	24.3000	24.3	0.5	39.5000	39.5	0.3038	29.3892	29.4	12	0.4082
	911 Carrera 4 Cabriolet	3.0L	3.0L / 194	AMS-7	4000	3875	27.2000	27.2	1.3	39.9000	39.9	0.9023	31.7473	31.7	36	1.1356
	911 Carrera 4S	3.0L	3.0L / 195	M7	3500	3750	24.6000	24.6	5.6	39.7000	39.7	3.4509	29.6800	29.7	137	4.6128
	911 Carrera 4S	3.0L	3.0L / 196	AMS-7	3500	3750	27.0000	27.0	14.0	39.3000	39.3	9.6183	31.4260	31.4	378	12.0982
	911 Carrera 4S Cabriolet	3.0L	3.0L / 197	M7	4000	3875	24.3000	24.3	2.1	39.3000	39.3	1.2723	29.3392	29.3	90	1.7065
	911 Carrera 4S Cabriolet	3.0L	3.0L / 198	AMS-7	4000	3875	27.3000	27.3	4.9	39.2000	39.2	3.3929	31.6194	31.6	133	4.2089
	911 Targa 4	3.0L	3.0L / 199	M7	4000	3875	24.3000	24.3	0.9	39.5000	39.5	0.5823	29.3892	29.4	23	0.7823
	911 Targa 4	3.0L	3.0L / 200	AMS-7	4000	4000	27.5000	27.5	2.5	39.9000	39.9	1.7043	31.9712	32.0	68	2.1250
	911 Targa 4S	3.0L	3.0L / 201	M7	4000	4000	24.3000	24.3	5.2	39.3000	39.3	3.2316	29.3392	29.3	127	4.3345
	911 Targa 4S	3.0L	3.0L / 202	AMS-7	4000	4000	26.8000	26.8	15.8	39.0000	39.0	10.8462	31.1907	31.2	423	13.5577
	911 Carrera GTS	3.0L	3.0L / 203	M7	3500	3625	22.7000	22.7	7.0	37.2000	37.2	4.2742	27.5286	27.5	159	5.7818
	911 Carrera GTS	3.0L	3.0L / 204	AMS-7	3500	3750	25.9000	25.9	13.8	36.5000	36.5	9.8082	29.7936	29.8	358	12.0134
	911 Carrera GTS Cabriolet	3.0L	3.0L / 205	M7	3500	3750	23.2000	23.2	1.6	36.9000	36.9	1.0298	27.8536	27.9	98	1.3620
	911 Carrera GTS Cabriolet	3.0L	3.0L / 206	AMS-7	4000	3875	25.1000	25.1	4.6	36.0000	36.0	3.2222	29.0593	29.1	416	3.9863
	911 Carrera 4 GTS	3.0L	3.0L / 207	M7	3500	3750	23.1000	23.1	2.0	37.4000	37.4	1.2567	27.9005	27.9	47	1.6846
	911 Carrera 4 GTS	3.0L	3.0L / 208	AMS-7	4000	3875	25.1000	25.1	5.1	36.2000	36.2	3.5359	29.1178	29.1	128	4.3986
	911 Carrera 4 GTS Cabriolet	3.0L	3.0L / 209	M7	4000	3875	22.9000	22.9	0.7	36.6000	36.6	0.4645	27.5387	27.5	17	0.6182
	911 Carrera 4 GTS Cabriolet	3.0L	3.0L / 210	AMS-7	4000	4000	25.0000	25.0	1.8	35.6000	35.6	1.2640	28.8680	28.9	45	1.5571
	911 Targa 4 GTS	3.0L	3.0L / 211	M7	4000	4000	22.3000	22.3	16.1	36.0000	36.0	10.0000	26.9080	26.9	360	13.3829
	911 Targa 4 GTS	3.0L	3.0L / 212	AMS-7	4000	4000	24.6000	24.6	14.6	36.0000	36.0	10.0000	28.6880	28.7	360	12.5436
	911 Carrera T	3.0L	3.0L / 213	M7	3500	3750	20.0000	20.0	16.2	35.2000	35.2	9.1761	24.8237	24.8	328	13.0242
	911 Carrera T	3.0L	3.0L / 214	AMS-7	3500	3750	25.0000	25.0	12.9	35.5000	35.5	8.8493	29.1301	29.1	323	11.0997
	911 Carrera Speedster	3.0L	3.0L / 215	AMS-7	3500	3750	16.6000	16.6	35.4	26.2000	26.2	22.4427	19.8775	19.9	588	29.5477
	911 Turbo	3.8L	3.8L / 232	AMS-7	4000	4000	23.4000	23.4	9.8	33.4000	33.4	6.8862	27.0436	27.0	250	8.5185
	911 Turbo Cabriolet	3.8L	3.8L / 232	AMS-7	4000	4000	23.3000	23.3	7.7	33.3000	33.3	5.3754	26.9406	26.9	179	6.6543
	911 Turbo S	3.8L	3.8L / 232	AMS-7	4000	4000	23.4000	23.4	25.5	33.4000	33.4	17.8743	27.0436	27.0	597	22.1111
	911 Turbo S Cabriolet	3.8L	3.8L / 232	AMS-7	4000	4000	23.3000	23.3	22.0	33.3000	33.3	15.4054	26.9406	26.9	513	19.0706
	911 Turbo S Cabriolet Exclusive	3.8L	3.8L / 233	AMS-7	4000	4000	20.5000	20.5	8.7	30.1000	30.1	5.9136	23.9352	23.9	178	7.4477
	911 GT3	4.0L	4.0L / 244	M6	3500	3625	16.0000	16.0	9.9	28.4000	28.4	5.5634	19.9124	19.9	358	7.9397



Porsche	911 GT3	4.0L	4.0L / 244	AMS-7	3500	3625	18.5000	18.5	12.8	27.9000	27.9	8.4946	21.8061	21.8	297	10.8716
Porsche	911 GT3 RS	4.0L	4.0L / 244	AMS-7	3500	3625	18.0000	18.0	82.7	26.5000	26.5	56.1509	21.0364	21.0	1,468	70.8571
Porsche	911 GT2 RS	3.8L	3.8L / 232	AMS-7	3500	3750	19.0000	19.0	11.1	29.0000	29.0	7.2759	22.4898	22.5	251	9.3778
Porsche	Panamera	3.0L	3.0L / 215	AMS-8	4500	4500	25.1000	25.1	40.1	39.8000	39.8	25.2764	30.1034	30.1	1,008	33.4219
Porsche	Panamera 4	3.0L	3.0L / 216	AMS-8	4500	4750	24.7000	24.7	29.6	38.2000	38.2	19.1099	29.3709	29.4	750	24.8299
Porsche	Panamera 4 Executive	3.0L	3.0L / 217	AMS-8	4500	4750	24.7000	24.7	1.3	38.2000	38.2	0.8639	29.3709	29.4	38	1.1224
Porsche	Panamera 4 ST	3.0L	3.0L / 218	AMS-9	4500	4750	24.3000	24.3	1.2	37.1000	37.1	0.8086	28.7651	28.8	30	1.0417
Porsche	Panamera 4S	3.0L	3.0L / 219	AMS-8	4500	4750	23.8000	23.8	3.8	39.4000	39.4	2.3096	28.9599	29.0	91	3.1379
Porsche	Panamera 4S Executive	3.0L	3.0L / 220	AMS-8	4500	4750	23.8000	23.8	0.5	39.4000	39.4	0.3299	28.9599	29.0	13	0.4483
Porsche	Panamera 4S ST	3.0L	3.0L / 221	AMS-8	4500	4750	23.5000	23.5	0.4	35.4000	35.4	0.2825	27.6885	27.7	10	0.3610
Porsche	Panamera GTS	4.0L	4.0L / 244	AMS-8	5000	5000	20.1000	20.1	34.7	33.2000	33.2	21.0241	24.4395	24.4	690	28.6066
Porsche	Panamera GTS ST	4.0L	4.0L / 244	AMS-8	5000	5000	19.6000	19.6	0.4	31.2000	31.2	0.2564	23.5381	23.5	8	0.3404
Porsche	Panamera Turbo	4.0L	4.0L / 244	AMS-8	5000	5000	23.0000	23.0	8.9	35.9000	35.9	5.7103	27.4365	27.4	205	7.4818
Porsche	Panamera Turbo Executive	4.0L	4.0L / 244	AMS-8	5000	5000	23.0000	23.0	0.3	35.9000	35.9	0.1950	27.4365	27.4	10	0.2555
Porsche	Panamera Turbo ST	4.0L	4.0L / 244	AMS-8	5000	5000	21.9000	21.9	0.4	32.5000	32.5	0.2769	25.6671	25.7	5	0.3502
Porsche	Panamera 4 e-Hybrid	2.9L	2.9L / 177	AMS-8	5500	5500	46.2902	46.3	10.8	58.0040	58.0	8.6379	50.9174	50.9	501	9.8428
Porsche	Panamera 4 e-Hybrid Executive	2.9L	2.9L / 177	AMS-8	5500	5500	46.2902	46.3	0.2	58.0040	58.0	0.1207	50.9174	50.9	7	0.1375
Porsche	Panamera 4 e-Hybrid ST	2.9L	2.9L / 177	AMS-8	5500	5500	46.2902	46.3	0.3	58.0040	58.0	0.2069	50.9174	50.9	12	0.2358
Porsche	Panamera Turbo S e-Hybrid	4.0L	4.0L / 244	AMS-8	6000	6000	41.8358	41.8	1.8	53.0786	53.1	1.4313	46.2436	46.2	76	1.6450
Porsche	Panamera Turbo S e-Hybrid Executive	4.0L	4.0L / 244	AMS-8	6000	6000	41.8358	41.8	0.2	53.0786	53.1	0.1695	46.2436	46.2	49	0.1948
Porsche	Panamera Turbo S e-Hybrid ST	4.0L	4.0L / 244	AMS-8	6000	6000	41.8358	41.8	0.4	53.0786	53.1	0.2825	46.2436	46.2	15	0.3247
Porsche	Boxster	2.0L	2.0L / 121	M6	3500	3375	27.1000	27.1	13.7	40.4000	40.4	9.2079	31.8129	31.8	872	11.6981
Porsche	Boxster S	2.5L	2.5L / 153	M6	3500	3500	24.6000	24.6	5.4	36.9000	36.9	3.6043	28.9412	28.9	153	4.6021
Porsche	Boxster S	2.5L	2.5L / 153	AMS-7	3500	3500	27.0000	27.0	12.6	39.7000	39.7	8.5642	31.5404	31.5	340	10.7937
Porsche	Boxster GTS	2.5L	2.5L / 153	M6	3500	3625	24.0000	24.0	4.9	35.0000	35.0	3.3429	27.9534	28.0	157	4.1786
Porsche	Boxster GTS	2.5L	2.5L / 153	AMS-7	3500	3625	25.1000	25.1	12.0	36.0000	36.0	8.3889	29.0593	29.1	302	10.3780
Porsche	Cayman	2.0L	2.0L / 121	M6	3500	3375	27.1000	27.1	14.1	40.4000	40.4	9.4802	31.8129	31.8	383	12.0440
Porsche	Cayman	2.0L	2.0L / 121	AMS-7	3500	3500	28.5000	28.5	33.8	42.1000	42.1	22.8504	33.3477	33.3	962	28.8889
Porsche	Cayman S	2.5L	2.5L / 153	M6	3500	3500	24.6000	24.6	6.0	36.9000	36.9	3.9837	28.9412	28.9	147	5.0865
Porsche	Cayman S	2.5L	2.5L / 153	AMS-7	3500	3500	27.0000	27.0	14.6	39.7000	39.7	9.9496	31.5404	31.5	395	12.5397
Porsche	Cayman GTS	2.5L	2.5L / 153	M6	3500	3625	24.0000	24.0	4.5	35.0000	35.0	3.1143	27.9534	28.0	109	3.8929
Porsche	Cayman GTS	2.5L	2.5L / 153	AMS-7	3500	3625	25.1000	25.1	11.7	36.0000	36.0	8.1667	29.0593	29.1	254	10.1031

a= 1.5200  
c= 0.0014

SF3IWC= 0.0143  
FE3IWC= 43.3330  
IWcalc= -0.0086

113.9779 4,939 3000 IW comb mpg  
2019 EVD 39.394 2019 IW total mpg

IWtrue= 0.0000  
adj factor= 1.0070  
AFEadj= 39.1577  
rounded adj= 39.2

= ADJ ROUNDED

MY 2019	
MPG	39.2
FCIV <sub>AC</sub>	0.00062337254
FCIV <sub>OC</sub>	0.00030066830
FCIV <sub>PU</sub>	0
ACCredit	374,828
VLM	195,264
Production	346,503
OCCredit	180,789
Average MPG	40.7

Volkswagen Group Total Units	346,503	
Baseline unadj unrounded (MPG)	38.8855	8,910.8577
Baseline unadj rounded (MPG)	38.9	
Baseline adjusted unrounded (MPG)	39.1577	
Baseline adjusted rounded (MPG)	39.2	
Volkswagen Group Fleet Average CAFE w/ Average FE Improvement (MPG)	1.5	
Volkswagen Group Fleet Average CAFE w/FE Improvement (MPG)	40.7	

# VOLKSWAGEN

GROUP OF AMERICA

Ms. Heidi King  
Deputy Administrator  
National Highway Traffic Safety Administration  
1200 New Jersey Ave. SW  
Washington, D.C. 20590

Sashi Velnati	Name
Mgr Compliance Reporting	Title
EEO	Department
248-754-4848	Phone
248-754-4207	Fax
Sashi.Velnati@vw.com	E-Mail

July 26, 2019 Date

Subject: 2019 Mid-Model Year Corporate Average Fuel Economy Report for  
Volkswagen Group Light Duty Trucks (CBI)

Dear Ms. King,

Attached is the 2019 Volkswagen Group of America, Inc. Mid-Model Year Corporate Average Fuel Economy Report for Light-Duty Trucks. This report has been prepared in accordance with the provisions of Title 40 Part 600.510-12 Code of Federal Regulations. A [REDACTED] request has been submitted to the NHTSA, Office of the Chief Counsel for the projected sales volumes and specific vehicle design information omitted from this submission. Disclosure of information identified as [REDACTED] from this report would cause substantial competitive harm.

VOLKSWAGEN GROUP OF AMERICA, INC.  
3800 HAMLIN ROAD  
AUBURN HILLS, MI 48326

Please contact me at (248) 754-4848, if you have any comments or questions related to this report.

Sincerely,



Sashi Velnati  
Engineering and Environmental Office

CC: Byron Bunker, Director  
U.S. EPA, Compliance Division

Enclosure

**2019 MID-MODEL YEAR CORPORATE AVERAGE FUEL  
ECONOMY REPORT**

**LIGHT DUTY TRUCKS**

**VOLKSWAGEN GROUP OF AMERICA, INC.**

**July 2019**

**VOLKSWAGEN GROUP**  
**2019 MID-MODEL YEAR CORPORATE AVERAGE FUEL ECONOMY**  
**REPORT**

**LIGHT DUTY TRUCKS**

**MANUFACTURERS AVERAGE CALCULATION**

**Calculate fuel economy average of automobiles where:**

$$\text{Average MPG} = \frac{1}{\left[ \frac{1}{\text{MPG}} - (\text{FCIV}_{\text{AC}} + \text{FCIV}_{\text{OC}} + \text{FCIV}_{\text{PU}}) \right]}$$

Average MPG = the fleet average fuel economy for a category of vehicles;

MPG = the average fuel economy for a category of vehicles

FCIV<sub>AC</sub> = Air conditioning fuel economy credits for a category of vehicles, in gallons per mile.

FCIV<sub>OC</sub> = Off-cycle technology fuel economy credits for a category of vehicles, in gallons per mile.

FCIV<sub>PU</sub> = Pickup truck fuel economy credits for the light truck category, in gallons per mile.

Note: Volkswagen Group of America intends to claim off-cycle credits in the future, impacting the final CAFE calculation.

	MY 2019 LDT
MPG	28.9
FCIV <sub>AC</sub>	0.0008631120
FCIV <sub>OC</sub>	0.0009438947
FCIV <sub>PU</sub>	0
ACCredit	670,989
VLM	225,865
Production	387,297
OCCredit	733,790
Average MPG	30.5

Fleet Standard	31.8
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## MY 2019 Mid-Model Year CAFE Report - LDT

	Brand	Carline	Engine	DISP	Transmission	HW	ETW	FE CITY	CITY	Formula	FE HWY	HWY	Formula	MT/FE COMB	COMB	Confidential Sales	Weighted Sales/MPG
Audi	Audi	Q5	2.0L	2.0L / 121	S7	4500	4500	24.3386	24.3	2,112.7	34.5112	34.3	1,496.8	28.0009	28.0	51,339	1,833.5357
	Audi	Q3 quattro	2.0L	2.0L / 121	S6	4000	4000	27.3996	27.4	284.4	42.5000	42.5	183.4	32.6142	32.6	7,793	239.0491
	Audi	Q7	2.0L	2.0L / 121	S8	5000	5250	24.5000	24.5	727.1	37.3000	37.3	477.6	28.9743	29.0	17,815	614.3103
	Audi	Q7	3.0L	3.0L / 183	S8	5000	5250	23.5000	23.5	1,221.6	35.2000	35.2	815.5	27.6332	27.6	28,707	1,040.1087
	Audi	Q8	3.0L	3.0L / 183	S8	5500	5500	20.9000	20.9	815.5	30.6987	30.7	555.2	24.4055	24.4	17,044	698.5246
	Audi	SQ5	3.0L	3.0L / 183	S7	4500	4750	23.3000	23.3	345.2	33.0000	33.0	243.8	26.8518	26.9	8,044	299.0335
	Audi	e-tron quattro	0.0L	0.0L / 0	E1	6000	6000	244.6000	244.6	52.2	241.6000	241.6	52.7980	243.2408	243.2	12,756	52.4507
Bentley	Bentley	Bentayga	6.0L	5.0L / 366	S8	6000	6000	17.6000	17.6	83.0	28.4000	28.4	51.4	21.2336	21.2	1,461	58.9151
Lamborghini	Lamborghini	Urus	4.0L	4.0L / 244	S8	5500	5500	15.0000	15.0	50.8	22.8000	22.8	33.4	17.7294	17.7	762	43.0508
Porsche	Porsche	Cayenne	3.0L	3.0L / 183	SA-8	5000	5000	23.7000	23.7	628.8	32.8000	32.8	454.4	27.0810	27.1	14,903	549.9262
	Porsche	Cayenne S	2.9L	2.9L / 177	SA-8	5000	5250	22.8000	22.8	186.1	31.6000	31.6	134.3	26.0656	26.1	4,244	162.6054
	Porsche	Cayenne S e-Hybrid	3.0L	3.0L / 183	SA-8	5000	5250	44.8237	44.8	41.0	54.3712	54.4	33.8	48.6695	48.7	1,837	37.7207
	Porsche	Cayenne Turbo	4.0L	4.0L / 244	SA-8	5500	5500	18.7000	18.7	76.5	27.6000	27.6	51.8	21.8741	21.9	2,480	65.2968
	Porsche	Macan	2.0L	2.0L / 121	SA-8	4500	4500	24.2897	24.3	820.5	33.7926	33.8	230.4	27.8088	27.8	17,787	280.1079
	Porsche	Macan S	3.0L	3.0L / 183	SA-8	4500	4750	22.8432	22.8	158.5	32.2223	32.2	112.2	26.2863	26.3	3,614	137.4144
	Porsche	Macan	3.6L	3.6L / 219	S8	4500	4500	25.7000	25.7	217.7	36.5000	36.5	153.3	29.6476	29.6	5,594	188.9865
Volkswagen	Volkswagen	Atlas	2.0L	2.0L / 121	S8	4500	4500	21.0000	21.0	1,421.0	33.3000	33.3	896.1	25.1864	25.2	29,840	1,184.1270
	Volkswagen	Atlas 4Motion	3.6L	3.6L / 219	S8	5000	5000	21.1972	21.2	3,068.8	32.2320	32.2	2,020.4	25.0576	25.1	2,663,058	2,591.9522
	Volkswagen	Tiguan	2.0L	2.0L / 121	S6	4000	4000	28.1000	28.1	1,397.5	42.1000	42.1	932.8	33.0450	33.0	39,269	1,189.9697
	Volkswagen	Tiguan 4Motion	2.0L	2.0L / 121	S8	4000	4250	26.8000	26.8	2,537.3	41.4990	41.5	1,638.6	31.8816	31.9	68,000	2,131.6614
	Volkswagen	Tiguan	2.0L	2.0L / 121	S6	4000	4000	28.1000	28.1	1,397.5	42.1000	42.1	932.8	33.0450	33.0	39,269	1,189.9697

Volkswagen Group Total Units	387,297	
Unrounded Fleet Average (MPG)	28.8839	13,408.7467
Rounded Fleet Average (MPG)	28.9	
Volkswagen Group Fleet Average CAFÉ w/ Average FE Improvement (MPG)	1.6	
Volkswagen Group Fleet Average CAFÉ w/FE Improvement (MPG)	30.5	

MY 2018 LDT	
MPG	28.9
FCV <sub>Ac</sub>	0.0008631120
FCV <sub>OC</sub>	0.0009438947
FCV <sub>NU</sub>	0.00000000
ACCredit	670,989
VLM	225,865
Production	387,297
OCCredit	733,790
Average MPG	30.5

**2019 MID-MODEL YEAR CORPORATE AVERAGE FUEL  
ECONOMY REPORT**

**FLEET STANDARDS – IMPORT PASSENGER CAR,  
DOMESTIC PASSENGER CAR, LIGHT DUTY TRUCK**

**VOLKSWAGEN GROUP OF AMERICA, INC.**

**July 2019**

[illegible]



[illegible]

Porsche	Cayman	Import	870	Steel Springs				2.0	3500	F 235 / 35Z010 R 265 / 45Z018	60.1	60.6	60.4	97.4	40.9	48.87	175.0	1	303.1	8.1/15/13B3	2.1488710
Porsche	Cayman	Import	870	Steel Springs				2.0	3500	F 235 / 35Z020 R 265 / 35Z010	60.1	60.6	60.4	97.4	40.9	48.87	175.0	1	303.1	2.0/24Z056	5.49014529
Porsche	Cayman S	Import	871	Steel Springs				2.5	3500	F 235 / 40Z010 R 265 / 40Z019	60.1	60.6	60.4	97.4	40.9	46.97	175.0	1	305.1	2.1/16Z045	0.044
Porsche	Cayman S	Import	871	Steel Springs				2.5	3500	F 235 / 35Z020 R 265 / 35Z010	60.1	60.6	60.4	97.4	40.9	48.87	175.0	1	305.1	2.4/7Z0429	2.35714229
Porsche	Cayman GT3	Import	872	Steel Springs				2.5	3500	F 235 / 40Z010 R 265 / 40Z019	60.1	60.6	60.4	97.4	40.9	46.97	175.0	1	305.1	2.1/15Z014	0.6224571
Porsche	Cayman GT3	Import	872	Steel Springs				2.5	3500	F 235 / 35Z020 R 265 / 35Z020	60.1	60.6	60.4	97.4	40.9	48.87	175.0	1	305.1	6.37346991	1.66
Audi	S05	DOT	315	Steel Springs				3.0L	4500	235 / 45 Z020	83.6	85.3	83.4	111.2	69.0	32.87	175.0	1	304.1	31.299611	31.299611
Audi	Q3 quattro	DOT	62	Steel Springs				3.0L	4500	235 / 50 R18	61.1	61.2	61.2	100.5	41.8	44.28	186.0	1	304.1	244.721163	1.7599366
Volkswagen	Atlas	DOT	180	Steel Springs				3.6L	4750	255 / 55 R18	87.0	87.6	87.3	117.3	54.8	29.87	284.2	1	304.1	175.99368	41.897649
Volkswagen	Atlas	DOT	180	Steel Springs				3.6L	4750	255 / 55 R18	87.0	87.6	87.3	117.3	54.8	29.87	284.2	1	304.1	598.98965	104.596468
Volkswagen	Atlas Allmotion	DOT	185	Steel Springs				3.6L	5000	235 / 65 R18	87.0	87.6	87.3	117.3	54.8	29.87	284.2	1	304.1	191.274821	19.683272
Audi	Q5	DOT	230	Steel Springs				2.0L	4500	235 / 65 R18	67.0	67.6	67.3	117.3	54.8	29.87	284.2	1	304.1	217.00302	228.910266
Audi	Q7	DOT	320	Steel Springs				3.0L	5250	235 / 65 R19	83.6	83.8	83.5	111.2	49.0	32.87	257.0	1	303.1	155.84801	192.782656
Audi	Q7	DOT	320	Steel Springs				3.0L	5250	235 / 65 R19	85.6	86.0	85.8	117.9	53.9	30.30	280.0	1	303.1	87.91538	63.625000
Audi	Q8	DOT	340	Steel Springs				3.0L	5250	235 / 60 R18	85.6	86.0	85.8	117.9	53.9	30.30	280.0	1	303.1	947.42574	107.555000
Audi	e-tron quattro	DOT	33	Steel Springs				3.0L	5250	275 / 50Z020	85.1	85.8	85.8	117.9	54.4	30.06	280.2	1	303.1	568.99933	60.375487
Mercedes-Benz	Beamer	DOT	33	Front: Independent Double wishbone Rear: Multilink				4.0L	6000	285 / 50Z020	64.8	64.6	64.7	115.3	51.8	31.35	282.3	1	303.1	406.88955	47.228693
Volkswagen	Tiguan	DOT	410	Steel Springs				4.0L	5500	F 285 / 45 Z031	66.5	66.7	66.6	117.9	54.5	30.01	278.1	1	303.1	46.883772	5.1661352
Volkswagen	Tiguan Allmotion	DOT	170	Steel Springs				4.0L	5500	F 285 / 45 Z021 R 315 / 40 Z021	66.7	67.3	67.0	118.2	55.0	29.78	285.1	1	303.1	215.587641	2.9727664
Volkswagen	Tiguan	DOT	301	Steel Springs				2.0L	4250	215 / 65-17	62.4	62.0	62.2	109.8	47.4	33.31	249.5	1	300.1	118.14641	151.390074
Porsche	Macan S	DOT	301	Steel Springs				2.0L	4150	235 / 60Z010 255 / 52Z010	65.2	65.0	65.2	110.5	60.0	32.31	261.7	1	300.1	201.27387	157.594929
Porsche	Macan S	DOT	311	Steel Springs				3.0L	4500	235 / 65Z010 255 / 50R010	65.2	65.0	65.1	110.5	59.0	32.31	261.7	1	300.1	371.85392	33.807708
Porsche	Cayenne	DOT	401	Steel Springs				3.0L	5000	235 / 65Z010 275 / 50R010	66.1	65.9	66.0	116.0	57.3	31.10	272.5	1	304.1	479.19610	54.686908
Porsche	Cayenne S	DOT	411	Steel Springs				3.0L	5000	235 / 65Z010 275 / 50R010	66.1	65.9	66.0	116.0	57.3	31.10	272.5	1	304.1	336.46302	35.743132
Porsche	Cayenne Turbo	DOT	421	Steel Springs				3.0L	5500	285 / 40Z020 315 / 52Z010	66.4	66.4	66.4	116.0	52.6	30.94	273.9	1	307.1	46.218487	5.3208835
Porsche	Cayenne S e-hybrid	DOT	441	Steel Springs				3.0L	5000	235 / 65Z010 275 / 50R010	66.1	65.9	66.0	116.0	57.3	31.10	272.5	1	307.1	59.067524	6.7472461

Import PC CAFE		
Total Units	346,503	
Weighted Target Sum	8,114.93	
CAFE Fleet Standard	42.80945585	
Vehicles per Group CAFE Std	42.7	

GHG Import & Domestic	
GHG Weighted Target Sum	1867.5
Fleet Standard	193.0618
Volkswagen GHG Standard	193

Domestic PC CAFE	14,009
Total Units	
Weighted Target Sum	340.52
CAFE Fleet Standard	41.14
Volkswagen Group CAFE Std	41.1

GHG LOT	
GHG Weighted Target Sum	2463.87
Fleet Standard	284.57
Volkswagen GHG Standard	265