

# 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  
November 16, 2020 Date

Subject: Petition for Inconsequential Noncompliance with  
FMVSS 138, Tire Pressure Monitoring System (TPMS)  
Certain 2020 – 2021 MY Volkswagen Vehicles

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

Dear Mr. Owens:

On November 11, 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 System (TPMS), existed in the following vehicles:

## Volkswagen

- 2020 Model Year Arteon;
- 2020 Model Year Atlas Cross Sport;
- 2020 Model Year Jetta;
- 2020 Model Year Jetta GLI
- 2020 Model Year Passat;
- 2020 Model Year Tiguan;
- 2021 Model Year Atlas;

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 115,855 vehicles of the following Volkswagen models:

- 2020 Model Year Arteon vehicles, produced between February 13, 2020 and June 19, 2020;
- 2020 Model Year Atlas Cross Sport vehicles, produced between February 25, 2020 and August 26, 2020;
- 2020 Model Year Jetta vehicles, produced January 06, 2020 and July 5, 2020;
- 2020 Model Year Jetta GLI vehicles, produced January 06, 2020 and July 4, 2020;
- 2020 Model Year Passat vehicles, produced December 16, 2019 and August 28, 2020;
- 2020 Model Year Tiguan vehicles, produced January 06, 2020 and July 4, 2020;
- 2021 Model Year Atlas vehicles, produced between February 27, 2020 and August 27, 2020

### **Noncompliant Condition**

Vehicles included in the recall may have received an owner's manual did not have the exact text printed as it is required under FMVSS 138 "Tire Pressure Monitoring System" S4.5(a).

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

FMVSS No. 138 requires that the statements set forth in S4.5(a) be printed in the vehicle owner's manuals to provide written instructions to vehicle operators about the functionality of the tire pressure monitoring system. Due to an error in the owner's manual editing process, the text set forth in S4.5(a) was not included in the exact wording specified.

A copy of the owner manual text comparison to FMVSS 138 is provided in Attachment A.

The primary safety purpose of S4.5(a) is to inform the vehicle operator how the tire pressure monitoring system works. The affected manuals all have sections devoted to describing appropriate tire pressures and the functionality of the tire pressure monitoring system. The affected manuals contain equivalent instructions to those set forth in S4.5(a), just in different words. The [attached/following] chart compares the instructions set forth in S4.5(a) to the comparable statements included in the affected manuals. Based on the comparison, the comparable text present in the owner's manual is consistent with the rationale and intent of the FMVSS No. 138 requirements, even though the exact words required by the standard are not used. Thus, it is Volkswagen's position that the technical noncompliance with S4.5(a) is inconsequential to motor vehicle safety.

Importantly, NHTSA has granted similar petitions in the past in which required owner's manual text was not present in verbatim form, but an equivalent version of the text was present. See 65 FR 14009-10 (label and owner's manual missing FMVSS No. 303 required text but include substantive equivalent) and 80 FR 68602-03 (owner's manual missing description required by FMVSS No. 226).

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

- 2020 Model Year Arteon vehicles, as of June 19, 2020;
- 2020 Model Year Atlas Cross Sport vehicles, as of August 26, 2020;
- 2020 Model Year Jetta vehicles, as of July 5, 2020;
- 2020 Model Year Jetta GLI vehicles, as of July 4, 2020;
- 2020 Model Year Passat vehicles, as of August 28, 2020;
- 2020 Model Year Tiguan vehicles, as of July 4, 2020;
- 2021 Model Year Atlas vehicles; as of August 27, 2020

**Inconsequentiality of Non-compliance cont'd.**

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 non-compliance does not present an unreasonable risk, 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,

A handwritten signature in blue ink, appearing to read 'C.T.S.', is written over the word 'Sincerely,'.

Christopher T. Sandvig  
Director, Group Customer Protection  
Group Quality

FMVSS wording	Atlas & Atlas Cross Sport	Passat	Tiguan	Jetta	Arteon
<p>Each tire, including the spare (if provided), should be checked monthly when cold and inflated to the inflation pressure recommended by the vehicle manufacturer on the vehicle placard or tire inflation pressure label. (If your vehicle has tires of a different size than the size indicated on the vehicle placard or tire inflation pressure label, you should determine the proper tire inflation pressure for those tires).</p>	<p>The tire pressure of all tires, including the spare wheel or temporary spare wheel, must be checked once a month when the tires are cold and must correspond to the details on the tire pressure label. If the size of the tires installed at the factory differs from the details on the type plate or on the tire pressure label, the correct tire pressure must be determined.</p>	<p>The pressure of all tires, including the spare wheel or temporary spare wheel, must be checked monthly on cold tires and the results must correspond to those on the manufacturer's tire pressure sticker. If the size of the tires installed at the factory differs from the details on the type plate or on the tire pressure label, the correct tire pressure must be determined.</p>	<p>The pressure of all tires, including the spare wheel or temporary spare wheel, must be checked monthly on cold tires and the results must correspond to those on the manufacturer's tire pressure sticker. If the size of the tires installed at the factory differs from the details on the type plate or on the tire pressure label, the correct tire pressure must be determined.</p>	<p>The pressure of all tires, including the spare wheel or temporary spare wheel, must be checked monthly on cold tires and the results must correspond to those on the manufacturer's tire pressure sticker. If the size of the tires installed at the factory differs from the details on the type plate or on the tire pressure label, the correct tire pressure must be determined.</p>	<p>· Check the tire pressure regularly and maintain the specified values → page 270. If the tire pressure is too low, the tire can heat up so much that the tread separates or the tire ruptures. If tires in a size that was not intended at the factory are installed, the specified pressure for these tires can be added by an authorized Volkswagen dealer or authorized Volkswagen Service Facility.</p> <p>1) <i>The specified tire pressure is given for a cold tire. For warm tires, the pressure is higher.</i>  <i>Checking the tire pressure</i>                      — Check the tire pressure at least once a month.</p> <p>2) <i>The tire pressure of the spare wheel, compact temporary spare wheel or temporary spare wheel must be checked every time the tire pressure of the regular wheels is taken, or at least once a month.</i></p>
<p>As an added safety feature, your vehicle has been equipped with a Tire Pressure Monitoring System (TPMS) that illuminates a low tire pressure telltale when one or more of your tires is significantly underinflated. Accordingly, when the low tire pressure telltale illuminates, you should stop and check your tires as soon as possible, and inflate them to the proper pressure. Driving on a significantly underinflated tire causes the tire to overheat and can lead to tire failure. Underinflation also reduces fuel efficiency and tire tread life, and may affect the vehicle's handling and stopping ability.</p>	<p>If the indicator light turns on, stop the vehicle immediately and check all of the tires → page 285.</p> <p>Different tire pressures or low tire pressure can increase tire wear, decrease vehicle stability, and increase braking distance. Different tire pressures or low tire pressure can cause sudden tire failure and lead to ruptured tires and loss of vehicle control.</p> <p>When the tire pressure is too low, the tire must flex more when driving. This could cause the tire to become so hot that the tread could separate, the tire could rupture, and you could lose control of the vehicle.</p> <p>Low tire pressure increases fuel consumption and tire wear</p>	<p>If the indicator light turns on, stop the vehicle immediately and check all of the tires → page 229.</p> <p>· Different tire pressures or low tire pressure can increase tire wear, decrease vehicle stability, and increase braking distance.</p> <p>· Different tire pressures or low tire pressure can cause sudden tire failure and lead to ruptured tires and loss of vehicle control.</p> <p>· When the tire pressure is too low, the tire must flex more when driving. This could cause the tire to become so hot that the tread could separate, the tire could rupture, and you could lose control of the vehicle.</p> <p>Low tire pressure increases fuel consumption</p>	<p>· If the indicator light turns on, stop the vehicle immediately and check all of the tires → page 299.</p> <p>· Different tire pressures or low tire pressure can increase tire wear, decrease vehicle stability, and increase braking distance.</p> <p>· Different tire pressures or low tire pressure can cause sudden tire failure and lead to ruptured tires and loss of vehicle control.</p> <p>· When the tire pressure is too low, the tire must flex more when driving. This could cause the tire to become so hot that the tread could separate, the tire could rupture, and you could lose control of the vehicle.</p> <p>Low tire pressure increases fuel consumption and tire wear.</p>	<p>· If the indicator light turns on, stop the vehicle immediately and check all of the tires → page 255.</p> <p>· Different tire pressures or low tire pressure can increase tire wear, decrease vehicle stability, and increase braking distance.</p> <p>· Different tire pressures or low tire pressure can cause sudden tire failure and lead to ruptured tires and loss of vehicle control.</p> <p>· When the tire pressure is too low, the tire must flex more when driving. This could cause the tire to become so hot that the tread could separate, the tire could rupture, and you could lose control of the vehicle.</p> <p>Low tire pressure increases fuel consumption and tire wear.</p>	<p>· If the indicator light turns on, stop the vehicle immediately and check all of the tires → page 270.</p> <p>· Different tire pressures or low tire pressure can increase tire wear, decrease vehicle stability, and increase braking distance.</p> <p>· Different tire pressures or low tire pressure can cause sudden tire failure and lead to ruptured tires and loss of vehicle control.</p> <p>· When the tire pressure is too low, the tire must flex more when driving. This could cause the tire to become so hot that the tread could separate, the tire could rupture, and you could lose control of the vehicle.</p> <p>Low tire pressure increases fuel consumption and tire wear.</p>
<p>Please note that the TPMS is not a substitute for proper tire maintenance, and it is the driver's responsibility to maintain correct tire pressure, even if underinflation has not reached the level to trigger illumination of the TPMS low tire pressure telltale.</p>	<p>The Tire Pressure Monitoring System is not intended to replace regular inspection and maintenance of the tires. The driver is responsible for ensuring that the correct tire pressure is used at all times, even if the Tire Pressure Monitoring System is not showing a warning that the tire pressure is too low.</p>	<p>The Tire Pressure Monitoring System is not intended to replace regular inspection and maintenance of the tires. The driver is responsible for ensuring that the correct tire pressure is used at all times, even if the Tire Pressure Monitoring System is not showing a warning that the tire pressure is too low.</p>	<p>The Tire Pressure Monitoring System is not intended to replace regular inspection and maintenance of the tires. The driver is responsible for ensuring that the correct tire pressure is used at all times, even if the Tire Pressure Monitoring System is not showing a warning that the tire pressure is too low.</p>	<p>The Tire Pressure Monitoring System is not intended to replace regular inspection and maintenance of the tires. The driver is responsible for ensuring that the correct tire pressure is used at all times, even if the Tire Pressure Monitoring System is not showing a warning that the tire pressure is too low.</p>	<p>Do not rely on the Tire Pressure Monitoring System (TPMS) alone. Inspect the tires regularly to make sure the tire pressure is correct and check the tires for any signs of damage, such as punctures, cuts, cracks, blisters, etc. Remove any objects stuck in the tread as long as they have not punctured the inside of the tire.</p> <p>The driver is responsible for maintaining the correct tire pressure in all tires on the vehicle. The recommended tire pressure can be found on a label → page 270.</p>
<p>Your vehicle has also been equipped with a TPMS malfunction indicator to indicate when the system is not operating properly. The TPMS malfunction indicator is combined with the low tire pressure telltale. When the system detects a malfunction, the telltale will flash for approximately 1 minute and then remain continuously illuminated. This sequence will continue upon subsequent vehicle start-ups as long as the malfunction exists.</p>	<p>The Tire Pressure Monitoring System also has a display for a malfunction that is accompanied by the warning light. In the event of a malfunction in the Tire Pressure Monitoring System, after switching on the ignition, the warning light flashes for around one minute and then stays lit.</p>	<p>The Tire Pressure Monitoring System also has a display for a malfunction that is accompanied by the warning light. In the event of a malfunction in the Tire Pressure Monitoring System, after switching on the ignition, the warning light flashes for around one minute and then stays lit.</p>	<p>The Tire Pressure Monitoring System also has a display for a malfunction that is accompanied by the warning light. In the event of a malfunction in the Tire Pressure Monitoring System, after switching on the ignition, the warning light flashes for around one minute and then stays lit.</p>	<p>The Tire Pressure Monitoring System also has a display for a malfunction that is accompanied by the warning light. In the event of a malfunction in the Tire Pressure Monitoring System, after switching on the ignition, the warning light flashes for around one minute and then stays lit.</p>	<p><b>Fault in Tire Pressure Monitoring System</b>                      The indicator light blinks for approximately 60 seconds and then stays yellow.</p> <p>One or more tires with tire pressure monitoring sensors were installed but not detected.</p> <p>— Drive for a few minutes until the indicator light turns off.</p> <p>One or more tires without tire pressure monitoring sensors were installed or a tire pressure monitoring sensor is malfunctioning.</p> <p>— Install tires with functioning tire pressure monitoring sensors.</p> <p>There is a system malfunction.</p> <p>— Switch the ignition off and back on again. If the malfunction continues, contact an authorized Volkswagen dealer or authorized Volkswagen Service Facility.</p>
<p>When the malfunction indicator is illuminated, the system may not be able to detect or signal low tire pressure as intended. TPMS malfunctions may occur for a variety of reasons, including the installation of replacement or alternate tires or wheels on the vehicle that prevent the TPMS from functioning properly. Always check the TPMS malfunction telltale after replacing one or more tires or wheels on your vehicle to ensure that the replacement or alternate tires and wheels allow the TPMS to continue to function properly.</p>	<p>If the Tire Pressure Monitoring System displays a malfunction, the tire pressure cannot be monitored correctly. A malfunction in the Tire Pressure Monitoring System can have a number of causes, e.g. a wheel or a tire being replaced. After replacing a wheel or tire, you must check whether the warning light displays a system malfunction to make sure that the Tire Pressure Monitoring System is working properly → page 280.</p>	<p>If the Tire Pressure Monitoring System displays a malfunction, the tire pressure cannot be monitored correctly. A malfunction in the Tire Pressure Monitoring System can have a number of causes, e.g. a wheel or a tire being replaced. After replacing a wheel or tire, you must check whether the warning light displays a system malfunction to make sure that the Tire Pressure Monitoring System is working properly → page 225.</p>	<p>If the Tire Pressure Monitoring System displays a malfunction, the tire pressure cannot be monitored correctly. A malfunction in the Tire Pressure Monitoring System can have a number of causes, e.g. a wheel or a tire being replaced. After replacing a wheel or tire, you must check whether the warning light displays a system malfunction to make sure that the Tire Pressure Monitoring System is working properly → page 295.</p>	<p>If the Tire Pressure Monitoring System displays a malfunction, the tire pressure cannot be monitored correctly. A malfunction in the Tire Pressure Monitoring System can have a number of causes, e.g. a wheel or a tire being replaced. After replacing a wheel or tire, you must check whether the warning light displays a system malfunction to make sure that the Tire Pressure Monitoring System is working properly → page 251.</p>	<p>One or more tires with tire pressure monitoring sensors were installed but not detected.</p> <p>— Drive for a few minutes until the indicator light turns off.</p> <p>One or more tires without tire pressure monitoring sensors were installed or a tire pressure monitoring sensor is malfunctioning.</p> <p>— Install tires with functioning tire pressure monitoring sensors.</p> <p>There is a system malfunction.</p> <p>— Switch the ignition off and back on again. If the malfunction continues, contact an authorized Volkswagen dealer or authorized Volkswagen Service Facility.</p> <p>There is a malfunction between a sensor and the system. Because of overlap among sensors that function in the same frequency range, the system function may be temporarily impaired.</p> <p>— Switch off or avoid using sources of interference, such as mobile devices, remote controls, or children's toys.</p>

# Part 573 Safety Recall Report

# 20V-653

**Manufacturer Name :** Volkswagen Group of America, Inc.

**Submission Date :** NOV 11, 2020

**NHTSA Recall No. :** 20V-653

**Manufacturer Recall No. :** 06C3 and 06C5



## Manufacturer Information :

## Population :

**Manufacturer Name :** Volkswagen Group of America, Inc.

**Number of potentially involved :** 115,855

**Address :** 3800 Hamlin Road

**Estimated percentage with defect :** 100 %

Auburn Hills MI 48326

**Company phone :** 1-800-893-5298

## Vehicle Information :

**Vehicle 1 :** 2020-2020 Volkswagen Arteon

**Vehicle Type :** LIGHT VEHICLES

**Body Style :** 4-DOOR

**Power Train :** GAS

**Descriptive Information :** Vehicles included in this compliance recall may have received an owner's manual that did not have the exact text printed as it is required under FMVSS 138 "Tire Pressure Monitoring System". Vehicles not included in this recall received a owner's manual that contained the required text as per the regulatory requirement.

Arteon vehicle count: 2,273 (06C3)

**Production Dates :** FEB 13, 2020 - JUN 19, 2020

**VIN Range 1 :** Begin : VVWCR7AN4LE012116 End : VVWDR7AN1LE018007  Not sequential

**Vehicle 2 :** 2020-2020 Volkswagen Passat

**Vehicle Type :** LIGHT VEHICLES

**Body Style :** 4-DOOR

**Power Train :** GAS

**Descriptive Information :** Vehicles included in this compliance recall may have received an owner's manual that did not have the exact text printed as it is required under FMVSS 138 "Tire Pressure Monitoring System". Vehicles not included in this recall received a owner's manual that contained the required text as per the regulatory requirement.

Passat vehicle count: 15,399 (06C3)

**Production Dates :** DEC 16, 2019 - AUG 28, 2020

**VIN Range 1 :** Begin : 1VWSA7A33LC008083 End : 1VWMA7A32LC024686  Not sequential

Vehicle 3 : 2021-2021 Volkswagen Atlas

Vehicle Type : LIGHT VEHICLES

Body Style : 4-DOOR

Power Train : GAS

Descriptive Information : Vehicles included in this compliance recall may have received an owner's manual that did not have the exact text printed as it is required under FMVSS 138 "Tire Pressure Monitoring System". Vehicles not included in this recall received a owner's manual that contained the required text as per the regulatory requirement.

Atlas vehicle count: 20,311 (06C3)

Production Dates : FEB 27, 2020 - AUG 27, 2020

VIN Range 1 : Begin : 1V2TR2CA5MC500130 End : 1V2PR2CA1MC522398  Not sequential

Vehicle 4 : 2020-2020 Volkswagen Atlas Cross Sport

Vehicle Type : LIGHT VEHICLES

Body Style : 4-DOOR

Power Train : GAS

Descriptive Information : Vehicles included in this compliance recall may have received an owner's manual that did not have the exact text printed as it is required under FMVSS 138 "Tire Pressure Monitoring System". Vehicles not included in this recall received a owner's manual that contained the required text as per the regulatory requirement.

Atlas Cross Sport vehicle count: 13,347 (06C3)

Production Dates : FEB 25, 2020 - AUG 26, 2020

VIN Range 1 : Begin : 1V21E2CA0LC211500 End : 1V21E2CAXLC226389  Not sequential

Vehicle 5 : 2020-2020 Volkswagen Tiguan

Vehicle Type : LIGHT VEHICLES

Body Style : 4-DOOR

Power Train : GAS

Descriptive Information : Vehicles included in this compliance recall may have received an owner's manual that did not have the exact text printed as it is required under FMVSS 138 "Tire Pressure Monitoring System". Vehicles not included in this recall received a owner's manual that contained the required text as per the regulatory requirement.

Tiguan vehicle count: 31,481 (06C5)

Production Dates : JAN 06, 2020 - JUL 04, 2020

VIN Range 1 : Begin : 3VV2B7AX3LM089444 End : 3VV0B7AX5LM146489  Not sequential

Vehicle 6 : 2020-2020 Volkswagen Jetta

Vehicle Type : LIGHT VEHICLES

Body Style : 4-DOOR

Power Train : GAS

**Descriptive Information :** Vehicles included in this compliance recall may have received an owner's manual that did not have the exact text printed as it is required under FMVSS 138 "Tire Pressure Monitoring System". Vehicles not included in this recall received a owner's manual that contained the required text as per the regulatory requirement.  
Jetta vehicle count: 30,597 (06C5)

**Production Dates :** JAN 06, 2020 - JUL 05, 2020

**VIN Range 1 : Begin :** 3VWCB7BU9LM012548 **End :** 3VWCB7BU5LM065554  Not sequential

Vehicle 7 : 2020-2020 Volkswagen Jetta GLI

Vehicle Type : LIGHT VEHICLES

Body Style : 4-DOOR

Power Train : GAS

**Descriptive Information :** Vehicles included in this compliance recall may have received an owner's manual that did not have the exact text printed as it is required under FMVSS 138 "Tire Pressure Monitoring System". Vehicles not included in this recall received a owner's manual that contained the required text as per the regulatory requirement.  
Jetta GLI vehicle count: 2,447 (06C5)

**Production Dates :** JAN 06, 2020 - JUL 04, 2020

**VIN Range 1 : Begin :** 3VW5T7BU2LM015975 **End :** 3VW6T7BU7LM065405  Not sequential

## Description of Noncompliance :

**Description of the Noncompliance :** Vehicles included in this compliance recall may have received an owner's manual that did not have the exact text printed as it is required under FMVSS 138 "Tire Pressure Monitoring System."

**FMVSS 1 :** 138 - Tire pressure monitoring systems

**FMVSS 2 :** NR

**Description of the Safety Risk :** This makes the TPMS information provided owner's manual technically noncompliant with the regulatory requirement and does not pose an unreasonable risk to motor vehicle safety.

**Description of the Cause :** During a change in the process to create U.S. market owner's manuals, incorrect information was entered into the database.

**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 : Volkswagen Group of America, Inc.

Address : 3800 Hamlin Road  
Auburn Hills MICHIGAN 48326

Country : United States

## Chronology :

April 08, 2020: First indication that verbatim text may be missing in some owners manuals.

May 2020 – October 2020: Analysis conducted to identify root cause, affected population, and evaluate regulatory requirements.

October 16, 2020: Topic presented in VWAG Product Safety committee and it was determined to be non-compliance, but with no unreasonable risk to motor vehicle safety. A compliance recall was decided with filing of a petition for inconsequentiality according to 49 CFR part 556.

## Description of Remedy :

Description of Remedy Program : Volkswagen is of the opinion that, while this issue is technically a noncompliance, it does not present an unreasonable risk to motor vehicle safety. Volkswagen will file a petition for inconsequential noncompliance. Retail sold units will not receive a recall remedy; however any unsold vehicles in dealer new car inventory will receive an owners manual supplement with the corrected, compliant TPMS text. Volkswagen does not plan to offer reimbursement.

How Remedy Component Differs from Recalled Component : Unsold vehicles in dealer new car inventory will receive an owners manual supplement with the corrected, compliant TPMS text.

Identify How/When Recall Condition was Corrected in Production : Topic was corrected in production:  
06/04/2020 in Emden (Germany)  
06/29/2020 in Puebla (Mexico) and  
08/19/2020 in Chattanooga (USA).



**Recall Schedule :**

Description of Recall Schedule : Dealers: On or before December 22, 2020

Planned Dealer Notification Date : DEC 22, 2020 - DEC 22, 2020

Planned Owner Notification Date : NR - NR

\* NR - Not Reported

# Part 573 Safety Recall Report

# 20V-653

**Manufacturer Name :** Volkswagen Group of America, Inc.

**Submission Date :** OCT 23, 2020

**NHTSA Recall No. :** 20V-653

**Manufacturer Recall No. :** 06C3 and 06C5



## Manufacturer Information :

## Population :

**Manufacturer Name :** Volkswagen Group of America, Inc.

**Number of potentially involved :** 115,858

**Address :** 3800 Hamlin Road

**Estimated percentage with defect :** 100 %

Auburn Hills MI 48326

**Company phone :** 1-800-893-5298

## Vehicle Information :

**Vehicle 1 :** 2020-2020 Volkswagen Passat

**Vehicle Type :** LIGHT VEHICLES

**Body Style :** 4-DOOR

**Power Train :** GAS

**Descriptive Information :** Vehicles included in this compliance recall may have received an owner's manual that did not have the exact text printed as it is required under FMVSS 138 "Tire Pressure Monitoring System". Vehicles not included in this recall received a owner's manual that contained the required text as per the regulatory requirement.

Passat vehicle count: 15,399

**Production Dates :** DEC 16, 2019 - AUG 28, 2020

**VIN Range 1 :** Begin : 1VWSA7A33LC008083 End : 1VWMA7A34LC024494  Not sequential

**Vehicle 2 :** 2020-2020 Volkswagen Arteon

**Vehicle Type :** LIGHT VEHICLES

**Body Style :** 4-DOOR

**Power Train :** GAS

**Descriptive Information :** Vehicles included in this compliance recall may have received an owner's manual that did not have the exact text printed as it is required under FMVSS 138 "Tire Pressure Monitoring System". Vehicles not included in this recall received a owner's manual that contained the required text as per the regulatory requirement.

Arteon vehicle count: 2,273

**Production Dates :** FEB 13, 2020 - JUN 19, 2020

**VIN Range 1 :** Begin : WVWCR7AN4LE012116 End : WVWDR7AN1LE018007  Not sequential

Vehicle 3 : 2021-2021 Volkswagen Atlas

Vehicle Type : LIGHT VEHICLES

Body Style : 4-DOOR

Power Train : GAS

Descriptive Information : Vehicles included in this compliance recall may have received an owner's manual that did not have the exact text printed as it is required under FMVSS 138 "Tire Pressure Monitoring System". Vehicles not included in this recall received a owner's manual that contained the required text as per the regulatory requirement.

Atlas vehicle count: 20,313

Production Dates : FEB 27, 2020 - AUG 27, 2020

VIN Range 1 : Begin : 1V2TR2CA5MC500130 End : 1V2PR2CA1MC522398  Not sequential

Vehicle 4 : 2020-2020 Volkswagen Atlas Cross Sport

Vehicle Type : LIGHT VEHICLES

Body Style : 4-DOOR

Power Train : GAS

Descriptive Information : Vehicles included in this compliance recall may have received an owner's manual that did not have the exact text printed as it is required under FMVSS 138 "Tire Pressure Monitoring System". Vehicles not included in this recall received a owner's manual that contained the required text as per the regulatory requirement.

Atlas Cross Sport vehicle count: 13,347

Production Dates : FEB 25, 2020 - AUG 26, 2020

VIN Range 1 : Begin : 1V2NE2CA4LC211503 End : 1V2RE2CA3LC226379  Not sequential

Vehicle 5 : 2020-2020 Volkswagen Tiguan

Vehicle Type : LIGHT VEHICLES

Body Style : 4-DOOR

Power Train : GAS

Descriptive Information : Vehicles included in this compliance recall may have received an owner's manual that did not have the exact text printed as it is required under FMVSS 138 "Tire Pressure Monitoring System". Vehicles not included in this recall received a owner's manual that contained the required text as per the regulatory requirement.

Tiguan vehicle count: 31,482

Production Dates : JAN 06, 2020 - JUL 04, 2020

VIN Range 1 : Begin : 3VV2B7AX3LM089444 End : 3VV0B7AX5LM146489  Not sequential

Vehicle 6 : 2020-2020 Volkswagen Jetta

Vehicle Type : LIGHT VEHICLES

Body Style : 4-DOOR

Power Train : GAS

**Descriptive Information :** Vehicles included in this compliance recall may have received an owner's manual that did not have the exact text printed as it is required under FMVSS 138 "Tire Pressure Monitoring System". Vehicles not included in this recall received a owner's manual that contained the required text as per the regulatory requirement.

Jetta vehicle count: 30,597

Production Dates : JAN 06, 2020 - JUL 05, 2020

VIN Range 1 : Begin : 3VWGB7BU4LM015987 End : 3VWEB7BU5LM065451  Not sequential

Vehicle 7 : 2020-2020 Volkswagen Jetta GLI

Vehicle Type : LIGHT VEHICLES

Body Style : 4-DOOR

Power Train : GAS

**Descriptive Information :** Vehicles included in this compliance recall may have received an owner's manual that did not have the exact text printed as it is required under FMVSS 138 "Tire Pressure Monitoring System". Vehicles not included in this recall received a owner's manual that contained the required text as per the regulatory requirement.

Jetta GLI vehicle count: 2,447

Production Dates : JAN 06, 2020 - JUL 04, 2020

VIN Range 1 : Begin : 3VW6T7BU0LM016434 End : 3VW6T7BU7LM065405  Not sequential

## Description of Noncompliance :

**Description of the Noncompliance :** Vehicles included in this compliance recall may have received an owner's manual that did not have the exact text printed as it is required under FMVSS 138 "Tire Pressure Monitoring System."

FMVSS 1 : 138 - Tire pressure monitoring systems

FMVSS 2 : NR

**Description of the Safety Risk :** This makes the TPMS information provided owner's manual technically noncompliant with the regulatory requirement and does not pose an unreasonable risk to motor vehicle safety.

**Description of the Cause :** During a change in the process to create U.S. market owner's manuals, incorrect information was entered into the database.

**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 : Volkswagen Group of America, Inc.

Address : 3800 Hamlin Road  
Auburn Hills MICHIGAN 48326

Country : United States

## Chronology :

April 08, 2020: First indication that verbatim text may be missing in some owners manuals.

May 2020 – October 2020: Analysis conducted to identify root cause, affected population, and evaluate regulatory requirements.

October 16, 2020: Topic presented in VWAG Product Safety committee and it was determined to be non-compliance, but with no unreasonable risk to motor vehicle safety. A compliance recall was decided with filing of a petition for inconsequentiality according to 49 CFR part 556.

## Description of Remedy :

Description of Remedy Program : Volkswagen is of the opinion that, while this issue is technically a noncompliance, it does not present an unreasonable risk to motor vehicle safety. Volkswagen will file a petition for inconsequential noncompliance. Retail sold units will not receive a recall remedy; however any unsold vehicles in dealer new car inventory will receive an owners manual supplement with the corrected, compliant TPMS text. Volkswagen does not plan to offer reimbursement.

How Remedy Component Differs from Recalled Component : Unsold vehicles in dealer new car inventory will receive an owners manual supplement with the corrected, compliant TPMS text.

Identify How/When Recall Condition was Corrected in Production : Topic was corrected in production:  
06/04/2020 in Emden (Germany)  
06/29/2020 in Puebla (Mexico) and  
08/19/2020 in Chattanooga (USA).

**Recall Schedule :**

Description of Recall Schedule : Dealers: On or before December 22, 2020

Planned Dealer Notification Date : DEC 22, 2020 - DEC 22, 2020

Planned Owner Notification Date : NR - NR

\* NR - Not Reported