

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 110 / § 575, Tire Selection and Rims for Motor Vehicles
with a GVWR of 4,536 kg (10,000 lbs.) or Less
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 October 23, 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. 110, Tire Selection and Rims for Motor Vehicles with a GVWR of 4,536 kg (10,000 lbs.) or Less, existed in the following vehicles:

Volkswagen

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

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 212,004 vehicles of the following Volkswagen models:

- 2020 Model Year Arteon vehicles, produced between February 13, 2020 and June 19, 2020;
- 2020-2021 Model Year Passat, produced between January 6, 2020 and October 14, 2020;
- 2020 Model Year Atlas, produced between February 24, 2020 and March 6, 2020;
- 2021 Model Year Atlas, produced on February 25, 2020;
- 2020-2021 Model Year Atlas Cross Sport, produced between February 24, 2020 and October 14, 2020;
- 2020-2021 Model Year Tiguan, produced between January 6, 2020 and October 20, 2020;
- 2020-2021 Model Year Jetta, produced between January 6, 2020 and October 20, 2020;
- 2020-2021 Model Year Jetta GLI produced between January 6, 2020 and October 20, 2020

Noncompliant Condition

Vehicles included in the recall may have received an owner's manual that did not have the exact verbatim text regarding the "Steps for Determining Correct Load Limit" according to Part 575 and required by the FMVSS 110 "Tire Selection and Rims" Test Procedure."

Inconsequentiality of Non-compliance

The 575 provision relevant to the required text is 49 CFR 575.6(a)(5)(i). It states:

(5) When a motor vehicle that has a GVWR of 10,000 pounds or less, except a motorcycle or low speed vehicle, and that is manufactured on or after September 1, 2005, is delivered to the first purchaser for purposes other than resale, the manufacturer shall provide to the purchaser, in writing in the English language and not less than 10 point type, the following verbatim statement, as applicable, in the owner's manual, or, if there is no owner's manual, in a document:

(i) For vehicles except trailers: "Steps for Determining Correct Load Limit—

(1) Locate the statement "The combined weight of occupants and cargo should never exceed XXX kg or XXX lbs." on your vehicle's placard.

(2) Determine the combined weight of the driver and passengers that will be riding in your vehicle.

(3) Subtract the combined weight of the driver and passengers from XXX kg or XXX lbs.

(4) The resulting figure equals the available amount of cargo and luggage load capacity. For example, if the "XXX" amount equals 1400 lbs. and there will be five 150 lb passengers in your vehicle, the amount of available cargo and luggage load capacity is 650 lbs. (1400-750 (5 x 150) = 650 lbs.)

(5) Determine the combined weight of luggage and cargo being loaded on the vehicle. That weight may not safely exceed the available cargo and luggage load capacity calculated in Step 4.

(6) If your vehicle will be towing a trailer, load from your trailer will be transferred to your vehicle. Consult this manual to determine how this reduces the available cargo and luggage load capacity of your vehicle."

Inconsequentiality of Non-compliance cont'd.

It has been identified the noncompliant language is limited to statement (6), which reads as follows:

(6) If your vehicle is capable of towing a trailer, load from your trailer will be transferred to your vehicle. Consult this manual to determine how this reduces the available cargo and luggage load capacity of your vehicle.

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

- The Test Procedure for FMVSS No. 110 includes a check of owner's manuals to see whether the load limit determination instructions set forth in 49 CFR 575.6(a)(5)(i) statement are present. A discrepancy with that section was noted by the Office of Vehicle Safety Compliance during an FMVSS No. 110 compliance audit test of the 2021 MY Volkswagen Atlas. Upon investigation, an error in the owner's manual editing process caused the required language to be translated from English to German, and then from German back to English. Thus, the affected manuals all include the same steps describing how to determine the load limit, just in slightly different words than those set forth in 49 CFR 575.6(a)(5)(i).
- The primary safety purpose of 49 CFR 575.6(a)(5)(i) is to inform the vehicle operator how to determine the appropriate load limit for their vehicle. The following comparison illustrates the minimal differences between the two versions, and it is quite clear that they are functionally equivalent. Based on the comparison, Volkswagen believes that the discrepancy is inconsequential to motor vehicle safety. Similar petitions have been granted by the agency in the past. 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;
- 2020-2021 Model Year Passat vehicles, as of October 14, 2020;
- 2020 Model Year Atlas vehicles, as of March 6, 2020;
- 2021 Model Year Atlas vehicles, as of February 25, 2020;
- 2020-2021 Model Year Atlas Cross Sport vehicles as of October 14, 2020;
- 2020-2021 Model Year Tiguan vehicles, as of October 20, 2020;
- 2020-2021 Model Year Jetta vehicles, as of October 20, 2020;
- 2020-2021 Model Year Jetta GLI vehicles, as of October 20, 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 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

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
December 14, 2020 Date

Subject: Petition for Inconsequential Noncompliance with
FMVSS 110 / § 575, Tire Selection and Rims for Motor Vehicles
with a GVWR of 4,536 kg (10,000 lbs.) or Less
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:

This petition amends our November 16, 2020 submission where 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. 110, Tire Selection and Rims for Motor Vehicles with a GVWR of 4,536 kg (10,000 lbs.) or Less, existed in the following vehicles:

Volkswagen

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

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 222,722 vehicles of the following Volkswagen models:

- 2020 Model Year Arteon FL vehicles, produced between September 23, 2020 and November 5, 2020;
- 2020-2021 Model Year Passat, produced between December 16, 2019 and November 2, 2020;
- 2020 Model Year Atlas, produced between February 27, 2020 and October 31, 2020;
- 2021 Model Year Atlas, produced on February 25, 2020 and October 14, 2020;
- 2020-2021 Model Year Atlas Cross Sport, produced between February 25, 2020 and November 2, 2020;
- 2020-2021 Model Year Tiguan, produced between January 6, 2020 and October 20, 2020;
- 2020-2021 Model Year Jetta, produced between January 6, 2020 and October 20, 2020;
- 2020-2021 Model Year Jetta GLI produced between January 6, 2020 and October 20, 2020;
- 2020 Model Year Arteon vehicles, produced between February 13, 2020 and July 7, 2020

Noncompliant Condition

Vehicles included in the recall may have received an owner's manual that did not have the exact verbatim text regarding the "Steps for Determining Correct Load Limit" according to Part 575 and required by the FMVSS 110 "Tire Selection and Rims" Test Procedure."

Inconsequentiality of Non-compliance

The 575 provision relevant to the required text is 49 CFR 575.6(a)(5)(i). It states:

(5) When a motor vehicle that has a GVWR of 10,000 pounds or less, except a motorcycle or low speed vehicle, and that is manufactured on or after September 1, 2005, is delivered to the first purchaser for purposes other than resale, the manufacturer shall provide to the purchaser, in writing in the English language and not less than 10 point type, the following verbatim statement, as applicable, in the owner's manual, or, if there is no owner's manual, in a document:

(i) For vehicles except trailers: "Steps for Determining Correct Load Limit—

(1) Locate the statement "The combined weight of occupants and cargo should never exceed XXX kg or XXX lbs." on your vehicle's placard.

(2) Determine the combined weight of the driver and passengers that will be riding in your vehicle.

(3) Subtract the combined weight of the driver and passengers from XXX kg or XXX lbs.

(4) The resulting figure equals the available amount of cargo and luggage load capacity. For example, if the "XXX" amount equals 1400 lbs. and there will be five 150 lb passengers in your vehicle, the amount of available cargo and luggage load capacity is 650 lbs. $(1400 - 750 (5 \times 150) = 650 \text{ lbs.})$

(5) Determine the combined weight of luggage and cargo being loaded on the vehicle. That weight may not safely exceed the available cargo and luggage load capacity calculated in Step 4.

(6) If your vehicle will be towing a trailer, load from your trailer will be transferred to your vehicle. Consult this manual to determine how this reduces the available cargo and luggage load capacity of your vehicle."

Inconsequentiality of Non-compliance cont'd.

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

- The Test Procedure for FMVSS No. 110 includes a check of owner's manuals to see whether the load limit determination instructions set forth in 49 CFR 575.6(a)(5)(i) statement are present. A discrepancy with that section was noted by the Office of Vehicle Safety Compliance during an FMVSS No. 110 compliance audit test of the 2021 MY Volkswagen Atlas. Upon investigation, an error in the owner's manual editing process caused the required language to be translated from English to German, and then from German back to English. Thus, the affected manuals all include the same steps describing how to determine the load limit, just in slightly different words than those set forth in 49 CFR 575.6(a)(5)(i).
- The primary safety purpose of 49 CFR 575.6(a)(5)(i) is to inform the vehicle operator how to determine the appropriate load limit for their vehicle. The following comparison illustrates the minimal differences between the two versions, and it is quite clear that they are functionally equivalent. Based on the comparison, Volkswagen believes that the discrepancy is inconsequential to motor vehicle safety. Similar petitions have been granted by the agency in the past. 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 FL vehicles, as of November 5, 2020;
- 2020-2021 Model Year Passat vehicles, as of November 2, 2020;
- 2020 Model Year Atlas vehicles, as of October 31, 2020;
- 2021 Model Year Atlas vehicles, as of October 14, 2020;
- 2020-2021 Model Year Atlas Cross Sport vehicles as of October 20, 2020;
- 2020-2021 Model Year Tiguan vehicles, as of October 20, 2020;
- 2020-2021 Model Year Jetta vehicles, as of October 20, 2020;
- 2020-2021 Model Year Jetta GLI vehicles, as of October 20, 2020;
- 2020 Model Year Arteon vehicles, as of July 7, 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 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 typed name.

Christopher T. Sandvig
Director, Group Customer Protection
Group Quality

Part 573 Safety Recall Report

20V-652

Manufacturer Name : Volkswagen Group of America, Inc.**Submission Date :** OCT 23, 2020**NHTSA Recall No. :** 20V-652**Manufacturer Recall No. :** 06C4 and 06C6**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 : 212,004

Estimated percentage with defect : 100 %

Vehicle Information :

Vehicle 1 : 2020-2020 Volkswagen Arteon

Vehicle Type : LIGHT VEHICLES

Body Style : 2-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 regarding the "Steps for Determining Correct Load Limit" according to Part 575 and required by the FMVSS 110 "Tire Selection and Rims" Test Procedure. Vehicles not included in this recall received an owner's manual that contained the required text as per the regulatory requirement.

Arteon vehicle count: 3,250

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

VIN Range 1 : Begin : WVVCR7AN4LE012116 End : WVVDR7AN1LE018007 Not sequential

Vehicle 2 : 2020-2021 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 regarding the "Steps for Determining Correct Load Limit" according to Part 575 and required by the FMVSS 110 "Tire Selection and Rims" Test Procedure. Vehicles not included in this recall received an owner's manual that contained the required text as per the regulatory requirement.

Passat vehicle count: 18,359

Production Dates : JAN 06, 2020 - OCT 14, 2020

VIN Range 1 : Begin : 1VWCA7A31LC007597 End : 1VWMA7A34LC027881 Not sequential

Vehicle 3 : 2020-2020 Volkswagen Atlas

Vehicle Type :

Body Style :

Power Train : NR

Descriptive Information : Vehicles included in this compliance recall may have received an owner's manual that did not have the exact text regarding the "Steps for Determining Correct Load Limit" according to Part 575 and required by the FMVSS 110 "Tire Selection and Rims" Test Procedure. Vehicles not included in this recall received an owner's manual that contained the required text as per the regulatory requirement.
Atlas vehicle count: 276

Production Dates : FEB 24, 2020 - MAR 06, 2020

VIN Range 1 : Begin : 1V2LR2CA9LC504759 End : 1V2ER2CA6LC505862 Not sequential

Vehicle 4 : 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 regarding the "Steps for Determining Correct Load Limit" according to Part 575 and required by the FMVSS 110 "Tire Selection and Rims" Test Procedure. Vehicles not included in this recall received an owner's manual that contained the required text as per the regulatory requirement.
Atlas vehicle count: 35,137

Production Dates : FEB 25, 2020 - OCT 14, 2020

VIN Range 1 : Begin : 1V2KR2CAXMC500118 End : 1V2GP2CA8MC539446 Not sequential

Vehicle 5 : 2020-2021 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 regarding the "Steps for Determining Correct Load Limit" according to Part 575 and required by the FMVSS 110 "Tire Selection and Rims" Test Procedure. Vehicles not included in this recall received an owner's manual that contained the required text as per the regulatory requirement.
Atlas Cross Sport vehicle count: 21,071

Production Dates : FEB 24, 2020 - OCT 14, 2020

VIN Range 1 : Begin : 1V2ME2CA8LC210219 End : 1V2ME2CA5MC201902 Not sequential

Vehicle 6 : 2020-2021 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 regarding the "Steps for Determining Correct Load Limit" according to Part 575 and required by the FMVSS 110 "Tire Selection and Rims" Test Procedure. Vehicles not included in this recall received an owner's manual that contained the required text as per the regulatory requirement.
Tiguan vehicle count: 67,255

Production Dates : JAN 06, 2020 - OCT 20, 2020

VIN Range 1 : Begin : 3VV2B7AX3LM089444 End : 3VV2B7AX2MM023727 Not sequential

Vehicle 7 : 2020-2021 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 regarding the "Steps for Determining Correct Load Limit" according to Part 575 and required by the FMVSS 110 "Tire Selection and Rims" Test Procedure. Vehicles not included in this recall received an owner's manual that contained the required text as per the regulatory requirement.
Jetta vehicle count: 64,733

Production Dates : JAN 06, 2020 - OCT 20, 2020

VIN Range 1 : Begin : 3VWGB7BU4LM015987 End : 3VWC57BU2MM011296 Not sequential

Vehicle 8 : 2020-2021 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 regarding the "Steps for Determining Correct Load Limit" according to Part 575 and required by the FMVSS 110 "Tire Selection and Rims" Test Procedure. Vehicles not included in this recall received an owner's manual that contained the required text as per the regulatory requirement.
Jetta GLI vehicle count: 5,173

Production Dates : JAN 06, 2020 - OCT 20, 2020

VIN Range 1 : Begin : 3VW6T7BU0LM016434 End : 3VW6T7BU3MM011293 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 Part 575 and the FMVSS 110 "Tire Selection and Rims" Test Procedure.

FMVSS 1 : 110 - Tire selection and rims

FMVSS 2 : NR

Description of the Safety Risk : This makes the "Steps for Determining Correct Load Limit" 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 :

09/29/2020: Information received that verbatim text regarding "Steps for Determining Correct Load Limits" may be missing in some owners manuals. Investigation initiated.

October 2020: Regulatory evaluation requested. Identification of potentially affected vehicles started.

10/14/2020 VWM was notified about the topic

10/15/2020 Topic presented in VWM Product Safety committee.

10/15/2020: Topic presented in VWAG Pre-Product Safety committee.

10/16/2020: Topic presented in VWAG Product Safety committee. Topic considered as non-compliance only

with no unreasonable risk to motor vehicle safety. A compliance recall was decided with filing of a petition for inconsequentiality according to 49CFR 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 "Steps for Determining Correct Load Limit" 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 "Steps for Determining Correct Load Limit" text.

Identify How/When Recall Condition was Corrected in Production : Topic was corrected in production:
10/20/2020 in Emden (Germany)
10/20/2020 in Puebla (Mexico) and
10/20/2020 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-652

Manufacturer Name : Volkswagen Group of America, Inc.**Submission Date :** NOV 11, 2020**NHTSA Recall No. :** 20V-652**Manufacturer Recall No. :** 06C4 and 06C6**Manufacturer Information :****Population :**

Manufacturer Name : Volkswagen Group of America, Inc.

Number of potentially involved : 222,722

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 FL

Vehicle Type : LIGHT VEHICLES

Body Style : 2-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 regarding the ""Steps for Determining Correct Load Limit"" according to Part 575 and required by the FMVSS 110 ""Tire Selection and Rims"" Test Procedure. Vehicles not included in this recall received an owner's manual that contained the required text as per the regulatory requirement.
Arteon FL vehicle count: 1122 (06C4)"

Production Dates : SEP 23, 2020 - NOV 05, 2020

VIN Range 1 : Begin : WVWTR7AN1ME001494 End : WVWSR7AN0ME004530 Not sequential

Vehicle 2 : 2020-2021 Volkswagen PASSAT PA2

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 regarding the ""Steps for Determining Correct Load Limit"" according to Part 575 and required by the FMVSS 110 ""Tire Selection and Rims"" Test Procedure. Vehicles not included in this recall received an owner's manual that contained the required text as per the regulatory requirement.
Passat vehicle count: 19282 (06C4)"

Production Dates : DEC 16, 2019 - NOV 02, 2020

VIN Range 1 : Begin : 1VWSA7A33LC008083 End : 1VWSA7A30MC001299 Not sequential

Vehicle 3 : 2020-2020 Volkswagen ATLAS FL

Vehicle Type :

Body Style :

Power Train : NR

Descriptive Information : Vehicles included in this compliance recall may have received an owner's manual that did not have the exact text regarding the ""Steps for Determining Correct Load Limit"" according to Part 575 and required by the FMVSS 110 ""Tire Selection and Rims"" Test Procedure. Vehicles not included in this recall received an owner's manual that contained the required text as per the regulatory requirement.
Atlas vehicle count: 39421 (06C4)

Production Dates : FEB 27, 2020 - OCT 31, 2020

Vehicle 4 : 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 regarding the "Steps for Determining Correct Load Limit" according to Part 575 and required by the FMVSS 110 "Tire Selection and Rims" Test Procedure. Vehicles not included in this recall received an owner's manual that contained the required text as per the regulatory requirement.
Atlas vehicle count: 35,137

Production Dates : FEB 25, 2020 - OCT 14, 2020

VIN Range 1 : Begin : 1V2KR2CAXMC500118 End : 1V2GP2CA8MC539446 Not sequential

Vehicle 5 : 2020-2021 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 regarding the ""Steps for Determining Correct Load Limit"" according to Part 575 and required by the FMVSS 110 ""Tire Selection and Rims"" Test Procedure. Vehicles not included in this recall received an owner's manual that contained the required text as per the regulatory requirement.
Atlas Cross Sport vehicle count: 23337 (06C4)"

Production Dates : FEB 25, 2020 - NOV 02, 2020

VIN Range 1 : Begin : 1V21E2CA0LC211500 End : 1V2AC2CAXMC204707 Not sequential

Vehicle 6 : 2020-2021 Volkswagen TIGUAN LWB

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 regarding the ""Steps for Determining Correct Load Limit"" according to Part 575 and required by the FMVSS 110 ""Tire Selection and Rims"" Test Procedure. Vehicles not included in this recall received an owner's manual that contained the required text as per the regulatory requirement.
Tiguan vehicle count: 67254 (06C6)

Production Dates : JAN 06, 2020 - OCT 20, 2020

VIN Range 1 : Begin : 3VV2B7AX3LM089444 End : 3VV2B7AX2MM023727 Not sequential

Vehicle 7 : 2020-2021 Volkswagen JETTA NF

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 regarding the ""Steps for Determining Correct Load Limit"" according to Part 575 and required by the FMVSS 110 ""Tire Selection and Rims"" Test Procedure. Vehicles not included in this recall received an owner's manual that contained the required text as per the regulatory requirement.
Jetta vehicle count: 64733 (06C6)"

Production Dates : JAN 06, 2020 - OCT 20, 2020

VIN Range 1 : Begin : 3VWCB7BU9LM012548 End : 3VWC57BU2MM011296 Not sequential

Vehicle 8 : 2020-2021 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 regarding the ""Steps for Determining Correct Load Limit"" according to Part 575 and required by the FMVSS 110 ""Tire Selection and Rims"" Test Procedure. Vehicles not included in this recall received an owner's manual that contained the required text as per the regulatory requirement.
Jetta GLI vehicle count: 5173 (06C6)

Production Dates : JAN 06, 2020 - OCT 20, 2020

VIN Range 1 : Begin : 3VW5T7BU2LM015975 End : 3VW6T7BU3MM011293 Not sequential

Vehicle 9 : 2020-2020 Volkswagen ARTEON

Vehicle Type :

Body Style :

Power Train : NR

Descriptive Information : Vehicles included in this compliance recall may have received an owner's manual that did not have the exact text regarding the ""Steps for Determining Correct Load Limit"" according to Part 575 and required by the FMVSS 110 ""Tire Selection and Rims"" Test Procedure. Vehicles not included in this recall received an owner's manual that contained the required text as per the regulatory requirement.
Arteon vehicle count: 2450 (06C4)

Production Dates : FEB 13, 2020 - JUL 07, 2020

VIN Range 1 : Begin : WVWBR7AN5LE011777 End : WVWTR7AN6LE019360 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 Part 575 and the FMVSS 110 "Tire Selection and Rims" Test Procedure.

FMVSS 1 : 110 - Tire selection and rims

FMVSS 2 : NR

Description of the Safety Risk : This makes the "Steps for Determining Correct Load Limit" 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 :

09/29/2020: Information received that verbatim text regarding "Steps for Determining Correct Load Limits" may be missing in some owners manuals. Investigation initiated.
October 2020: Regulatory evaluation requested. Identification of potentially affected vehicles started.
10/14/2020 VWM was notified about the topic
10/15/2020 Topic presented in VWM Product Safety committee.
10/15/2020: Topic presented in VWAG Pre-Product Safety committee.
10/16/2020: Topic presented in VWAG Product Safety committee. Topic considered as non-compliance only with no unreasonable risk to motor vehicle safety. A compliance recall was decided with filing of a petition for inconsequentiality according to 49CFR 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 "Steps for Determining Correct Load Limit" 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 "Steps for Determining Correct Load Limit" text.

Identify How/When Recall Condition was Corrected in Production : Topic was corrected in production:
10/20/2020 in Emden (Germany)
10/20/2020 in Puebla (Mexico) and
10/20/2020 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