

CRISIS RESPONSE STRATEGIES: A CASE STUDY OF THE VOLKSWAGEN EMISSIONS SCANDAL

MIKAELA OOSTHUIZEN

Nelson Mandela Univeristy
E-mail: oosthuizenmikaela@gmail.com

Abstract— This paper incorporates the use of content analysis in using the Volkswagen Emissions Scandal and the resulting press releases issued by Volkswagen in the build-up to, and aftermath of, the “Diesel-Dupe crisis” in order to investigate how the business communication during the crisis could have been handled more affectively. By analysing the press releases from Volkswagen from the 18th of September 2015 – 30th of September 2016 (23 in total) using content analysis and coding key themes according to Coomb’s framework of crisis response strategies, the evolution of Volkswagen’s engagement with stakeholders as moving from “non-existence” (denial / explanation / attack and intimidation); to distancing (excuses/downplaying); to “association” (bolstering/transcendence/victim); to “acceptance and accommodation (full apology, remediations, repentance, rectification), is analysed.

Index Terms- Volkswagen, Emissions Scandal, Diesel Dupe, Business Reputation, Crisis Management, Crisis Communication.

I. INTRODUCTION

The modern day corporate climate will inevitably result in an organisation facing a crisis situation [1]. The organisation’s proactive or reactive response this crisis, as well as its interactions with stakeholders, could therefore either reinforce or ruin its reputation. Various scholars] note that effective communication management, as well as decisive and immediate action during a crisis, is essential to ensuring that trust is rebuilt and the organisation’s temporarily dented brand image is quickly restored [2, 3, 4, 5, 6, 7]. The Volkswagen Emissions Scandal or “diesel dupe,” is viewed as Volkswagen’s worst crisis in its 78 year history and an embarrassment for Germany, which has long touted Volkswagen, the world’s second-biggest carmaker, as a model of its engineering prowess [8, 9].

Volkswagen’s deceptive “Clean Air” claims led to massive tax breaks and several environmental awards such as the “Green Car of the Year” [10] creating a financial advantage to internal stakeholders to the detriment of external stakeholders. Volkswagen’s original claims, if true, would have enhanced their overall sustainability profile, yet their deceptive practices meant the opposite occurred [11].

Volkswagen admitted to installing “defeat device” software from 2009 to 2015 in 11 million vehicles that automatically cheated on air-pollution tests [12]. In the test mode, the cars are fully compliant with all federal emissions levels.

But when driving normally, the computer switches to a separate mode—significantly changing the fuel pressure, injection timing and exhaust-gas recirculation to corrupt readings and enabled

Volkswagen vehicles to emit 40 times more pollution than legally allowed [13, 14].

II. RATIONALE FOR THE STUDY

The deception by top Volkswagen officials, as well as their ill-informed crisis management choices had catastrophic results [13]. A total of \$14.7 billion in criminal and civil penalties were paid by Volkswagen to the Environment Protection Agency (EPA) and California Air Resources Board (CARB), halting American expansion plans [9]. In addition, six Volkswagen employees were prosecuted by the American Department of Justice and 500,000 vehicles had to be recalled, with shares plunging one third [13].

Before the international crisis disrupted, the emissions scandal started as a mere issue. An issue is a public concern about Volkswagen’s direction and activities regarding a specific conflict area [15]. The ICCT was the first to raise the issue of emission discrepancies in 2014. The crisis had however been brewing for an extended time as the EPA had also given Volkswagen repeated warnings on emission levels in relation to test results from 2013 [10]. The greatest damage however, is the reputational loss the company suffered among stakeholders, due to their inadequate handling of the crisis [11]. Reputational damage thus affected not only the Volkswagen managing body as their deception resulted in broken trust, but also Volkswagen products, as any claims by Volkswagen about their products now lack credibility [16].

By analysing the press releases from Volkswagen from the 18th of September 2015 – 30th of September 2016 (23 in total) using content analysis and coding key themes according to Coomb’s framework of crisis

response strategies, the evolution of Volkswagen’s engagement with stakeholders as moving from “non-existence” (denial / explanation / attack and intimidation); to distancing (excuses/downplaying); to “association” (bolstering/transcendence/victim); to “acceptance and accommodation (full apology, remediations, repentance, rectification), is analysed.

III. RESEARCH

A. Research Methodology

This research employed the use of a case study which was investigated according to content analysis. A case study is a thorough and rigorous analysis of a certain research problem which concentrates on a specific issue to provide a complete account of events, relationships, experiences or processes [17]. The Volkswagen Emissions Scandal was therefore the case analysed according to content analysis through concentrating on the content, underlying themes and significance of the communicative textual features of official press releases [18,19].

B. Research Design, Data Collection and Processing Through using the Volkswagen Diesel-Dupe as a case study, content analysis was employed to sift through the data from the press releases. Press releases between the featured timeline were abstracted from the official Volkswagen press release archives. In processing the data a combination of Creswell [20] and Tesch’s [21] model was and so the researcher:

(1) Organised and formulated the data for analysis by

extracting the information of the selected case study

(2) Read through all data within the outline timeline within the Volkswagen archives in order to get an overall sense of the information and wrote down emerging ideas

(3) Coded the data by organising it into themes of information through identifying the most expressive words for themes while endeavouring to reduce the sub themes by combining similar concepts

(4) Interpreted the results of the analysis according to Coombs [22] outlined framework (see Annexure A).

IV. FINDINGS

Volkswagen’s crisis is categorised as a “transgression” as it was an internal and intentional act that knowingly placed stakeholders and the publics at risk and managers used their authority to mislead regulators and consumers [23, 24]. The scandal was, neither an error, nor an accident, but rather purposefully crafted deception and fraud [25]. Scholars have noted that the most effective way to manage an issue of “transgression” is to follow the acceptance and apology tactics [24]. Volkswagen however, only employed these tactics after extensive and excessive reputational damage had already been inflicted. As the crisis gained momentum, Coombs’ [22] three basic response options of deny, diminish and deal were employed (see Figure 1).

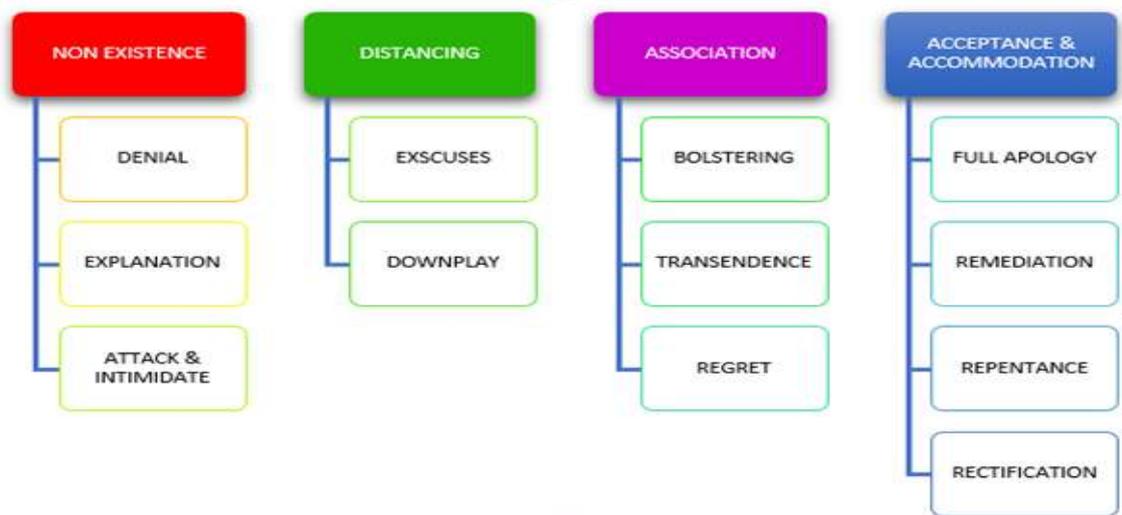


Figure 1: Coomb’s response options

Source: Coomb 2016 [22]

A. Non-Existence Response Strategy

Volkswagen employed denial tactics by glossing over allegations. Volkswagen took various warnings from environmental investigations for granted until they received the EPA’s threat to ban Volkswagen’s 2016

model cars. They dismissed allegations, claimed no organisational responsibility and denied the issues to both internal and external stakeholders asserting that they “do not and will not tolerate violations of any kind” [20-09-2015] [26]. Initial press statements even go so far as to contain mild warnings to stakeholders

to “desist from taking any action at this time” [18-09-2015], thus trying to gloss over the problem and proceed with business as usual. Furthermore, internal stakeholders were also misled when, upon investigation, Volkswagen managers destroyed documents related to the scheme [24] thus going against their assurance in press statements that they were “cooperating with investigators” [18-09-2015].

Volkswagen built on their denial tactics through explanations, namely, clarifying why there is no crisis. For over a year before the revelation, Volkswagen had justified the emissions discrepancies to stakeholder regulators such as the EPA as mere technical glitches [26]. Volkswagen’s further insistence to stakeholders that any indications of spikes in pollution levels were technical errors and not proof of any true emissions issues [27].

Volkswagen used attack and intimidation tactics to whistle-blower stakeholders such as regulators and environmental activists through actively confronting the groups, instigating the threats and threatening to sue them for the supposedly unfounded claims [22]. Volkswagen engineers tried to “discredit the findings,” blaming technical reasons for the inconsistent test results [10]. The rhetoric of Volkswagen press statements further illustrates this, as reference is made to ‘fixing this issue’ indicating an intention to quickly do away with the issue irrespective of its consequences to humans and the environment, while mention to “alleged findings” all aim to question the credibility of the investigations by regulatory stakeholders such as the EPA and CARB [13].

A. Distancing Response Strategy

After this initial stage, distancing tactics were employed:

Excuses were then provided. In any crisis there is often one individual who becomes the spokesperson for the situation [28]. Many top officials pleaded ignorance of the wrongdoing with then CEO Prof Winterkorn “shocked” by the revelations [23-09-2015] [9]. Justifying his lack of knowledge to external stakeholders, he stated that it was not possible to control every aspect of the Volkswagen group vehicles as there are sixty different models, five different brands, three different engines and two different transmissions [25].

Volkswagen downplayed the severity of the situation at every avenue, such as labelling the legal prosecutions as “rumours” in press statements [22]. When further analysing the language content of Volkswagen press statements issued to external stakeholders such as the general public, Volkswagen

educates the public about the issuance of a mere “notice” from the EPA, thus belittling the serious nature of a regulatory stakeholder, the EPA’s petition [29]. Emphasis is furthermore placed on the fact that even though international regulations were violated, the cars remained safe to drive with statements such as “at no time was the safety of our customers compromised” [06-10-2015].

B. Association Response Strategy

As the crisis mounted, association tactics came to the fore:

Through bolstering tactics, Volkswagen seeks to remind stakeholders of its past sustainability efforts, by for example, mentioning that Volkswagen had won “Green Car of the Year” [22]. Volkswagen promotes its “green” brand image by constantly positioning it as an organisation that deeply cares for the environment through its “Clean Diesel” as an alternative to hybrid and electric vehicles [9]. Attempts are therefore made to associate Volkswagen with its history of sustainable practices, whilst simultaneously distancing itself from “certain emission matters” which in itself conceal the unethical practices nature of the allegations and makes no acknowledgement of wrongdoing. Press releases included statements such as “it is inconsistent that the company involved in this emissions issue is also a company that has invested in environmental efforts to reduce the carbon footprint in our factories around the world” [08-10-2015].

Transcendence was evident in Volkswagen’s aims to dilute the negatives from the crisis with a more important positive sustainable end goal [25]. The Volkswagen Strategy 2025, launched after the crisis, praises the transparent discussion of core issues within the automobile industry and attributes this revelation to meaningful innovations to fast-track sustainability in all vehicles [30]. Furthermore, the flawed emissions testing systems in comparison to real-world driving, was brought to light [9] and steps are now being taken to cover testing loopholes and assess legal compliance to provide fair comparisons (Zhou, 2016). Volkswagen is also paying an additional \$225 million toward projects that reduce NOx emissions [9]. The fact that the crisis place pressure on the whole automotive industry and caused in-depth scrutiny by government inspectors worldwide [31] is proposed as a positive effect. Volkswagen is therefore claiming its crisis has uplifted environmental ethics in the general automobile industry, thus inadvertently trying to position itself positively to external stakeholders.

Volkswagen furthermore denied intention of harm and portrayed itself as a victim by blaming the crisis on factors beyond their control [22]. Volkswagen often blamed outside organisations by making reference to “impossibly strict” governmental regulation and

environmental expectations [11] with America having the strictest clean air regulations in the world and a history of enforcing them [12] thus subtly blaming their unethical practices on the attempts of attainment of impossible sustainability standards [8]. Their campaign thus aimed to affect criteria used to judge policies and policymakers and change acceptable social norms by highlighting that all automaker companies struggle to adhere to these allegedly unfair regulations and that many other manufacturers have been unethical in some of their tests as well [4]. For example, a £1million investigation by the United Kingdom (UK) government uncovered the illegal use of temperature-based cheating mechanism to pass lab tests by other car manufacturers [31]. It furthermore emphasised how the Volkswagen brand had become part of the American culture with statements such as “over the 60 years Volkswagen has been in the United States, it has become part of the American culture and employed more than 6,000 Americans in 60 facilities across the United States” [08-10-2015].

D. Acceptance and Accommodation Response Strategy

Finally Acceptance and Accommodation were employed:

Volkswagen initially tried to avoid a full apology as apologies leave an organisation open to legal liabilities [22]. The delay of their apology caused serious reputational damage as admission came only after the EPA threatened to withhold approval for the company's 2016 Volkswagen and Audi diesel models [10]. It was therefore not social decency that caused their admittance, but rather financial motives [16]. As soon as the risk of car sales was evident, then and then only, did the company admit wrongdoing [12]. This moment of publicly accepting full responsibility as “mortification,” where Volkswagen loses credibility by admitting guilt and pleading for forgiveness with stakeholders [22]. Statements such as “Volkswagen takes full responsibility for our actions, and we intend to make things right” [29-10-2015].

Once responsibility was accepted, Volkswagen announced remediation plans via initial protection instructing information about what stakeholders need and want to know [22]. Over 500,000 vehicles were recalled and Volkswagen gave external stakeholder consumers the choice to sell back their cars to an internal stakeholder Volkswagen dealership owner as part of a \$10 billion buyback programme [9]. Consumers could also alter their vehicles to adhere to American emission standards [8]. A total of \$4.3 billion in criminal and civil penalties were paid to external stakeholder regulators such as the EPA and CARB [28]. Outside law firms were employed by Volkswagen in order to “objectively investigate” proceedings [25-09-2015]. Due to the delayed tactics,

many consumers viewed these measures as “too little too late” [14].

Repentance was eventually achieved. Expressing concern, compassion and regret when attending to victim concerns works as an extension of an apology [22]. Volkswagen's crisis manager, Horn dealt with the aftermath of a crisis by addressing the stakeholders directly and admitting that the company “broken the trust of customers and the public” and “neglected professional responsibility” [08-12-2015] [25]. The promise of holding guilty parties accountable is also evident in this strategy as it was noted that “all participants in these proceedings will be subject to the full consequences” and subsequently many top managers stepped down [01-10-2018].

Rectification, as an accommodation strategy, was then employed by taking corrective action among internal stakeholder employees to prevent a crisis of this nature at Volkswagen. As noted in press releases most important task will therefore be to win back the trust we have lost Volkswagen therefore eventually delivered on its promise to “do everything necessary in order to reverse the damage caused” [20-09-2015]. Corrective action involved steps taken by the accused to repair damage and avoid reoccurrence of issues. Volkswagen's Strategy 2025 “TOGETHER” is an example of this, where steps are put in place to create a “new, better and even stronger Volkswagen” [28-06-2016] [30]. Volkswagen furthermore issued a statement that “the company has set up websites where customers can check whether their vehicles are affected by entering the chassis number” [06-10-2015]. Volkswagen furthermore promised to “provide owners of the vehicles affected by the emissions with a \$500 Volkswagen Prepaid Visa Loyalty Card, a \$500 Volkswagen Dealership Card and no-charge 24-hour Roadside Assistance for three years” [15-11-2015].

Volkswagen was instructed to create an additional fund to assist stakeholders suffering from the environmental harmful effects caused by Volkswagen cars' pollution to the environment [8]. The American Justice Department, as a regulatory stakeholder, placed the company under an independent corporate compliance monitor, while the prosecution of individuals responsible for the crimes continues [24]. Volkswagen promised to “re-establish credibility by uncovering the full truth of what happened” [11-01-2016]. Fines to the various regulatory bodies were also paid and “Volkswagen agreed to creating a \$2.7 billion environmental remediation fund and to invest \$2 billion in initiatives to promote the use of zero emissions vehicles in the US” [28-06-2016]. Furthermore, franchise owners who had suffered

losses were compensated in part as Volkswagen “agreed to make a maximum total of \$1.208 billion in cash payments to eligible dealers and to provide additional benefits to resolve alleged past, current and future claims of losses in franchise value” [30-09-2016].

V. CONCLUSION

It is therefore clear from analysing the textual data of press releases of the Volkswagen group between the September 2015-2016 period that selecting a suitable crisis response strategy from the onset can save and salvage a reputation. Using Coombs response strategy framework [22], it was clear that as the issues reached crisis point, Volkswagen tried various ineffective means to deal with the emerging problems. These findings are key for future businesses to understand that when a transgression has occurred, the best strategy is to implement acceptance and accommodation response strategies from the onset (such as issuing a full apology/offering remediation/expressing repentance/proposing steps to rectify the damage), instead of first trying to evade blame through non-existence strategies (denial/explanation/attack/intimidation); to distancing (excuses/downplaying); to “association” (bolstering/transcendence/victim).

REFERENCES

- [1] Murray, K & White, J. 2004. A report on the value of public relations as perceived by organisational leaders. Views on Reputation Management [Online]. Available at: https://www.researchgate.net/profile/Jon_White6/publication/247623435_CEOs%27_views_on_reputation_management/links/54256e180cf26120b7ac98ab/CEOs-views-on-reputation-management.pdf [Accessed: 22 April 2017].
- [2] Mendelsohn, H. 1973. Some Reasons Why Information Campaigns Can Succeed. *The Public Opinion Quarterly*, 37(1):50-61
- [3] Dozier, D.M. & Brom, G.M. 1995. Evolution of managerial role in Public Relations Practice. *Journal of Public Relations search*, 7(1):3-26.
- [4] Coffman, J. 2002. An Environmental Scan of Challenges, Criticisms, Practice, and Opportunities. Harvard Family Research Project, 1(1):1-35.
- [5] Argenti, P.A. Howell, R.A. and Beck, K.A. 2005. The Strategic Communication Imperative. MIT Sloan [Online]. Available at: <http://sloanreview.mit.edu/article/the-strategic-communication-imperative/>. [Accessed: 17 April 2017].
- [6] James, K. 2013. Volkswagen Means Business. *Entrepreneur* [Online]. Available at: <https://www.entrepreneur.com/article/225656>. Accessed: 21 April 2017.
- [7] Cornelissen, J. 2014. *Corporate Communication: A Guide to Theory and Practice*. 4th Edition.
- [8] Mansouri, N. 2016. A Case Study of Volkswagen Unethical Practice in Diesel Emission Test. *International Journal of Science and Engineering Applications*, 5(4):211-216.
- [9] Atiyeh, C. 2017. Everything You Need To Know About The VW Diesel-Emissions Scandal. Car and Driver: Blog [Online]. Available at: <http://blog.caranddriver.com/everything-you-need-to-know-a>

- bout-the-vw-diesel-emissions-scandal/. [Accessed: 5 May 2017].
- [10] Gardener, T. Lienert, P. & Morgan, D. 2015. Insight-After year of stonewalling, VW stunned US regulators with confession. Reuters [Online]. Available at: <http://www.reuters.com/article/usa-volkswagen-deception-idUSL1N11U1OB20150924> [Accessed: 10 April 2017].
- [11] Koplin, J., Seuring, S. & Mesterharm, M. 2007. Incorporating Sustainability into Supply Management in the Automotive Industry - The Case of The Volkswagen AG. *Journal of Cleaner Production*, 15(1):1053-1062.
- [12] Plungis, J. & Hall, D. 2015. VW's Emissions Cheating Found by Curious Clean-Air Group. Bloomberg Press [Online]. Available at: <https://www.bloomberg.com/news/articles/2015-09-19/volkswagen-emissions-cheating-found-by-curious-clean-air-group>. [Accessed: 1 April 2017].
- [13] Euro News. 2015. Volkswagen Admits It "Totally Screwed Up" As Emissions Rigging Scandal Spreads. Euro News [Online]. Available at: <http://www.euronews.com/2015/09/22/volkswagen-admits-it-totally-screwed-up-as-emissions-rigging-scandal-spreads> [Accessed: 10 April 2017].
- [14] Neate, R. 2015. Volkswagen under investigation over illegal software that masks emissions. *The Guardian* [Online]. Available at: <https://www.theguardian.com/business/2015/sep/18/epa-california-investigate-volkswagen-clean-air-violations>. [Accessed: 10 April 2017].
- [15] Cornelisen, J. & Schwartz, T. 2014. The Rewards of Investing in Quality Dividend Companies. ABC News [Online]. Available at: <http://abcnews.go.com/Business/rewards-investing-quality-dividend-companies/story?id=34377902> [Accessed: 2 May 2017].
- [16] Goodman, L.M. 2015. Why Volkswagen Cheated. *Newsweek* [Online]. Available at: <http://www.newsweek.com/2015/12/25/why-volkswagen-cheated-404891.html> [Accessed 1 May 2017].
- [17] Denscombe, M. 2008. *The good research guide for small-scale social research projects*. 3rd Edition. New York: Open University Press.
- [18] Bryman, A. & Bell, E. 2014. *Research methodology*. South Africa. Cape Town: Oxford University Press.
- [19] Quinlan, C. 2011. *Business research methods*. South-Western: Cengage Learning.
- [20] Creswell, J.W., 2014. *Research design: Qualitative, quantitative and mixed methods approaches*. 4th Edition. Thousand Oaks, California: Sage Publications.
- [21] Tesch, R. 1992. *Qualitative research: Analysis types and software tools*. United States of America, New York: Routledge-Falmer.
- [22] Coombs, T. 2006. The Protective Powers of Crisis Response Strategies: Managing Reputational Assets during a Crisis. *Journal of Promotion Management*, 12(4):241-260.
- [23] Cornelissen, J. Haslam, S.A. & Balmer, J. 2007. Social Identity, Organisational Identity and Corporate Identity: Towards an Integrated Understanding of Processes, Patterning and Products. *British Journal of Management*, 18(1):1-16.
- [24] Jaeger, J. 2017. Volkswagen Pays \$4.3B for Emissions-Cheating Scandal. *Compliance Week* [online]. Available at: <https://www.complianceweek.com/subscribe#.WO9S5NKGPIU> Accessed: 13 April 2017.
- [25] Patra, B. 2016. The Deliberate Deception: Case Study on Volkswagen Emission Scandal. *XIMB Journal of Management*, 13(1):139-148.
- [26] Kresge, N. & Weiss, R. 2015. Volkswagen Drops 23% After Admitting Diesel Emissions Cheat. Bloomberg Press [Online]. Available at: <https://www.bloomberg.com/news/articles/2015-09-21/volkswagen-drops-15-after-admitting-u-s-diesel-emissions-cheat> [Accessed: 1 April 2017].
- [27] Fleming, 2015. Volkswagen Diesel Scandal Threatens to Ruin its Credibility and Value, Los Angeles Times [Online].

- Available at: <http://www.latimes.com/business/autos/la-fi-hy-vw-diesel-20150923-story.html>. Accessed: 10 April 2017.
- [28] Hotten, R. 2015. Volkswagen: The Scandal Explained. BBC [Online]. Available at: <http://www.bbc.com/news/business-34324772> [Accessed: 10 April 2017].
- [29] Business Culture, 2014. Business Culture in German Etiquette. Business Culture [Online]. Available at: <http://businessculture.org/western-europe/business-culture-in-germany/business-etiquette-in-germany/> [Accessed 18 April 2017].
- [30] Volkswagen, 2017. Strategy 2025 [Online]. Available at: <https://www.volkswagenag.com/en/group/strategy.html> [Accessed: 21 April 2017].
- [31] Auto Express UK, 2015. VW Emissions Scandal Recalls Compensation: Is Your Car Affected? Auto Express UK [Online]. Available at: [http://www.autoexpress.co.uk/volkswagen/92893/vw-emissions-scandal-recalls-compensation-is-your-car-affected-latest-news.](http://www.autoexpress.co.uk/volkswagen/92893/vw-emissions-scandal-recalls-compensation-is-your-car-affected-latest-news/) [Accessed: 6 May 2017].

ADDENDUM A – VOLKSWAGEN US PRESS RELEASE

VOLKSWAGEN US PRESS RELEASE SEPTMBER 2015-2016		
DATE	PRESS RELEASE	CRISIS RESPONSE
SEP 18, 2015	VOLKSWAGEN STATEMENT REGARDING EPA INVESTIGATION	NON-EXISTANT
SEP 20, 2015	STATEMENT OF PROF. DR. MARTIN WINTERKORN, CEO OF VOLKSWAGEN AG	DISTANCING
SEP 23, 2015	STATEMENT BY PROF. DR. WINTERKORN	DISTANCING
SEP 23, 2015	STATEMENT FROM THE EXECUTIVE COMMITTEE OF VOLKSWAGEN AG'S SUPERVISORY BOARD	NON-EXISTANT
SEP 25, 2015	MATTHIAS MÜLLER APPOINTED CEO OF THE VOLKSWAGEN GROUP	ASSOCIATION
SEP 25, 2015	THE VOLKSWAGEN GROUP IS RESTRUCTURING: SUPERVISORY BOARD PASSES RESOLUTIONS FOR NEW ORGANIZATION	ASSOCIATION
SEP 25, 2015	STATEMENT BY THE SUPERVISORY BOARD OF VOLKSWAGEN AG	DISTANCING
SEP 25, 2015	DR. HERBERT DIESS, CEO OF THE VOLKSWAGEN PASSENGER CARS BRAND, EXPLAINS: "WE ARE WORKING AT FULL SPEED ON A SOLUTION."	ASSOCIATION
OCT 1, 2015	STATEMENT FROM THE EXECUTIVE COMMITTEE OF VOLKSWAGEN AG'S SUPERVISORY BOARD FOLLOWING ITS MEETING ON SEPTEMBER 30, 2015	DISTANCING
OCT 6, 2015	MATTHIAS MÜLLER: "WE WILL OVERCOME THIS CRISIS"	NON-EXISTANT
OCT 8, 2015	TESTIMONY OF MICHAEL HORN BEFORE THE HOUSE COMMITTEE ON ENERGY AND COMMERCE SUBCOMMITTEE ON OVERSIGHT AND INVESTIGATIONS	ACCEPTANCE AND ACCOMMODATION
OCT 13, 2015	VOLKSWAGEN BRAND BOARD OF MANAGEMENT TAKES STRATEGIC DECISIONS	ACCEPTANCE AND ACCOMMODATION
OCT 29, 2015	TESTIMONY OF CHRISTIAN KOCH BEFORE THE TENNESSEE SENATE COMMITTEE ON FINANCE, WAYS AND MEANS APPROPRIATIONS SUBCOMMITTEE	ASSOCIATION
NOV 15, 2015	VOLKSWAGEN TO PROVIDE GOODWILL PACKAGE TO U.S. 2.0L TDI OWNERS AFFECTED BY EMISSIONS ISSUE	ASSOCIATION
DEC 8, 2015	PRESS CONFERENCE ON DECEMBER 10TH 2015	ASSOCIATION
JAN 11, 2016	MATTHIAS MÜLLER: "THE USA IS AND REMAINS A CORE MARKET FOR THE VOLKSWAGEN GROUP."	ASSOCIATION
JAN 11, 2016	VOLKSWAGEN OF AMERICA TO EXTEND GOODWILL PACKAGE TO U.S.TOUAREG TDI OWNERS AFFECTED BY EMISSIONS ISSUE	ASSOCIATION
FEB 4, 2016	DAVID DETWEILER APPOINTED NEW EXECUTIVE VICE PRESIDENT AND GENERAL COUNSEL	ASSOCIATION

APR 21, 2016	VOLKSWAGEN STATEMENT REGARDING TDI AGREEMENTS IN PRINCIPLE	ACCEPTANCE AND ACCOMMODATION
MAY 24, 2016	VOLKSWAGEN STATEMENT REGARDING MAY 24, 2016 DIESEL STATUS CONFERENCE	ACCEPTANCE AND ACCOMMODATION
JUN 28, 2016	VOLKSWAGEN REACHES SETTLEMENT AGREEMENTS WITH U.S. FEDERAL REGULATORS, PRIVATE PLAINTIFFS AND 44 U.S. STATES ON TDI DIESEL ENGINE VEHICLES	ACCEPTANCE AND ACCOMMODATION
JUL 26, 2016	VOLKSWAGEN ANNOUNCES PRELIMINARY APPROVAL OF 2.0L TDI SETTLEMENT PROGRAM IN THE UNITED STATES	ACCEPTANCE AND ACCOMMODATION
AUG 25, 2016	VOLKSWAGEN AND VW-BRANDED FRANCHISE DEALERS IN THE U.S. REACH AGREEMENT IN PRINCIPLE TO RESOLVE DIESEL LITIGATION	ACCEPTANCE AND ACCOMMODATION
SEP 30, 2016	VOLKSWAGEN RESOLVES CLAIMS OF VW-BRANDED FRANCHISE DEALERS IN THE UNITED STATES	ACCEPTANCE AND ACCOMMODATION
