

13V-061
(4 pages)

Fuji Heavy Industries U.S.A., Inc.
c/o Subaru of America
Subaru Plaza
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Cherry Hill, NJ 08034-6000
856-488-8500
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February 22, 2013
Ref. No.: GR13-014

Ms. Nancy Lummen Lewis
Associate Administrator for Enforcement,
National Highway Traffic Safety Administration
Attention: Recall Management Division (NVS-215)
1200 New Jersey Ave. SE
Washington, DC 20590

RE: Part 573 Defect Information Report – Remote Engine Starter (RES) Accessory on certain Subaru Legacy, Outback, Impreza, and XV Crosstrek vehicles

Dear Ms. Lewis,

In accordance with 49 CFR Part 573, "Defect and Noncompliance Responsibility and Reports," Fuji Heavy Industries USA, Inc. on behalf of Subaru of America, Inc. and Fuji Heavy Industries, Ltd., submits the enclosed notification and report concerning a defect in the Remote Engine Starter (RES) on certain 2010MY through 2012MY Subaru Legacy and Outback vehicles*, certain 2012MY through 2013MY Impreza vehicles (except WRX/STI models), and certain 2013MY XV Crosstrek vehicles sold in the United States. Our internal designation for this recall campaign will be: WQF-42.

*Replacement FOBs on twelve (12) 2013MY Legacy/Outback vehicles are also affected. All other 2013MY Legacy/Outback vehicles are OK.

If you have any questions on the enclosed report, please contact me at (443) 430-3619 or jfro@subaru.com.

Sincerely,

A handwritten signature in black ink, appearing to read "John Frooshani".

John Frooshani
Safety Activities Manager
Government Relations
Fuji Heavy Industries USA, Inc.

Defect Information Report (49 CFR Part 573.6)

573.6(c)(1) - Manufacturer's Name

Vehicle Fabricating Manufacturers:

Fuji Heavy Industries, Ltd. ["FHI"]
1-7-2 Nishi-Shinjuku
Shinjuku-ku
Tokyo 160-8316, Japan

Subaru of Indiana Automotive, Inc. ["SIA"]
5500 State Road 38 East
Lafayette, Indiana 47903

Designated U.S. Agency:

Fuji Heavy Industries USA, Inc.
2235 Rt. 70 West
Cherry Hill, NJ 08002

573.6(c)(2)(i) - Identification of Vehicles Potentially Containing the Defect

Based on vehicle production records, we have determined from production dates that the potential recall affected passenger car population is as follows:

Make:

- Subaru

Model Year(s), Model(s) and Production Dates:

- **2010MY through 2012MY Legacy and Outback vehicles*** if equipped with an automatic or CVT transmission and an Audiovox remote engine starter (RES) accessory.
- **2012MY through 2013MY Impreza vehicles (except WRX/STI models)** if equipped with a CVT transmission and an Audiovox remote engine starter (RES) accessory.
- **2013MY XV Crosstrek vehicles** if equipped with a CVT transmission and an Audiovox remote engine starter (RES) accessory.

*Replacement FOBs on twelve (12) 2013MY Legacy/Outback vehicles are also affected. All other 2013MY Legacy/Outback vehicles are OK.

Model Year	Model	Production Dates*		Notes
2010	Legacy	February 2009 (SOP)	May 2010 (EOP)	-
2011	Legacy	April 2010 (SOP)	August 2011 (EOP)	-
2012	Legacy	May 2011 (SOP)	June 2012 (EOP)	-
2013	Legacy	March 2012 (SOP)	February 22, 2013 (Ship Date from Port)	Replacement FOBs on 4 VINs affected. All other vehicles OK.
2010	Outback	March 2009 (SOP)	May 2010 (EOP)	-
2011	Outback	April 2010 (SOP)	August 2011 (EOP)	-
2012	Outback	April 2011 (SOP)	June 2012 (EOP)	-
2013	Outback	March 2012 (SOP)	February 22, 2013 (Ship Date from Port)	Replacement FOBs on 8 VINs affected. All other vehicles OK.
2012	Impreza (NOT WRX/STI)	April 2011 (SOP)	June 2012 (EOP)	-
2013	Impreza (NOT WRX/STI)	April 2012 (SOP)	February 22, 2013 (Ship Date from Port)	-
2013	XV Crosstrek	April 2012 (SOP)	February 22, 2013 (Ship Date from Port)	-

*Except where noted

573.6(c)(3) - Total Number of Items Potentially Containing the Defect

A total of 47,419 accessory RES kits were sold by SOA and may have been installed on the vehicles identified in response to 573.6(c)(2)(i) above.

573.6(c)(5) - Description of the Defect

Product Description:

If a Remote Engine Starter (RES) fob is dropped, movement of the internal battery retaining clip may occur and cause damage to a component on the PC board. Under this condition, the fob may transmit an engine start (or stop) request without the user pressing the button. If the vehicle is in range and receives the request, the engine may start and run for up to 15 minutes (or until a stop request is received). The engine may continue to start and stop until the fob battery is depleted, or until the vehicle runs out of fuel. If that occurs when the vehicle is parked in an enclosed area, such as a garage, there is a risk of carbon monoxide build-up, which may pose a safety hazard.

The defect does not pose a risk while driving because the RES system is completely deactivated after the vehicle is started with the key. Original Equipment (OE) keyless entry fobs integrated on vehicle key are not affected.

573.6(c)(6) - Chronology of Principal Events

- June 1, 2009: SOA (Subaru of America) started shipping RES accessories (P/No. H001SAJ000) for the affected 2010MY-2012MY Legacy/Outback vehicles.
- June 27, 2011: SOA started shipping RES accessories (P/No. H001SFJ000) for the affected 2012MY Impreza vehicles
- November 21, 2011: SOA received a RES Engineering Change Request (ECR) from Audiovox which added the adhesive to protect against damage to the PC board.
- December 20, 2011: SOA approved Audiovox's RES Engineering Change Request (ECR).
- After December 20, 2011: Adhesive was erroneously added to just one wing of the RES battery holder at a subcontract factory (the original design specification requires that adhesive be added to both wings of the battery holder).
- March 2012: Audiovox noticed improper application of adhesive, which was then added to both wings of the RES battery holder per the RES engineering drawing.
- July 2012: SOA confirmed an increase of RES warranty claims due to the erroneously added adhesive and requested Audiovox to improve quality.
- August 2012: Audiovox started their investigation.
- November 2012: SOA started shipping RES accessories (P/No. H001SFJ300) for the affected 2013MY Impreza/XV Crosstrek vehicles
- December 4, 2012: Audiovox completed their investigation and reported the result to SOA.
- December 19, 2012: SOA issued a technical report and SOA/FHI started a joint investigation.
- February 14, 2013: FHI/SOA finished their investigation and concluded that Subaru would conduct a safety recall in the U.S. market.

573.6(c)(8) - Description of the Manufacturer's Remedy Program

(i) The remedy plan calls for dealers to replace and reprogram the original RES Key FOBs (2 per kit) with new ones.

(ii) Subaru of America, Inc. expects to notify U.S. dealers around February 22, 2013. Subaru will start preparing remedy parts. It is expected that owner notification will begin within 60 days. Subaru will update NHTSA if the situation changes significantly.

573.6(c)(10) - Submission of Recall Communications

Fuji Heavy Industries USA, Inc. will provide copies of all notices, bulletins and other recall related communications within 5 days after their distribution.

573.6(c)(11) - Manufacturer's Campaign Number

Our identification code for this recall campaign will be: WQF-42.

577.5(a) - Submission of Owner Notification Letter

A copy of the owner notification letter will be submitted to NHTSA's Recall Management Division at least 5 days prior to mailing.