



SUBARU.

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Joy May 26, 15

May 22, 2015

Ref. No.: GR15-019

Mr. Scott Yon
Chief, Vehicle Integrity Division
Office of Defects Investigation
National Highway Traffic Safety Administration
1200 New Jersey Avenue SE, Room W48-314
Washington, DC 20590

Re: NVS-212ifa/PE15-012 2012MY Subaru Impreza (except WRX/STI) Occupant Control Units (OCU)

Dear Mr. Yon,

This letter and enclosures are a partial response by Subaru of America, Inc. (Subaru, SOA) to your letter concerning the NHTSA's Preliminary Evaluation (PE15-012, April 15, 2015) investigation of allegations of improper operation of the passenger air bag system in model year 2012 Subaru Impreza (except WRX/STI) vehicles. This is a partial response. This submission includes a complete response for question no.'s 1-3 and 6-7. As granted, we will submit a second response by June 9th. This second response will include question no.'s 4-5. In addition, as granted, we will submit a third response by June 19th. This third response will include question no.'s 8-11.

Note that some of this information contains personally identifiable information. As we discussed, NHTSA will ensure this information is protected per Agency policy.

As requested in your letter, our response is provided after repeating, verbatim, the applicable request which is in bold text.

- 1. State within the body of the response to this letter the number of all subject vehicles Subaru has manufactured, or imported for sale, in the United States Separately, for each subject vehicle manufactured by Subaru, state the following:**
 - a. Vehicle Identification number (VIN);
 - b. Date of manufacturer (in "yyyy/mm/dd" date format);
 - c. Date warranty coverage commenced (in "yyyy/mm/dd" date format)
 - d. The State in the United States where the vehicle was originally sold or leased (or delivered for sale or lease); and
 - e. The ODS software version.

Provide this information in Microsoft Access 2010, or a compatible format, entitled "PRODUCTION DATA."

Subaru response:

Subaru has manufactured the following number of 2012MY Impreza subject vehicles: 56,982.

Listed below are the ODS Software Version codes:

- PLRDMF01 (before mid-February 2012 running change, non-heated seats)
- PLRDMF02 (before mid-February 2012 running change, heated seats)
- PLRDMF03 (after mid-February 2012 running change, non-heated seats)
- PLRDMF04 (after mid-February 2012 running change, heated seats)

Enclosed on "Disc 1" is an Access file named "PE15-012" with a table entitled "PRODUCTION DATA" with the requested data "a" through "e".

The information was sourced from Fuji Heavy Industries, Inc. (FHI) and Subaru of America, Inc. (SOA). The last date the information was gathered was May 13, 2015.

2. **State within the body of the response to this letter the number of each of the following, received by Subaru, or of which Subaru is otherwise aware, which relate to, or may relate to, the alleged defect in the subject vehicles:**
- a. **Consumer complaints;**
 - b. **Field reports, including dealer field reports;**
 - c. **Reports involving a crash, injury, or fatality, based on claims against Subaru involving a death or injury, or notices received by Subaru alleging or proving that a death or injury was caused by the alleged defect in a subject vehicle;**
 - d. **Property damage claims;**
 - e. **Third-party arbitration proceedings where Subaru is or was a defendant or codefendant; and**
 - f. **Lawsuits, both pending and closed, in which Subaru is or was a defendant or codefendant.**

For subparts "a" through "d," state the total number of each item (e.g., consumer complaints, field reports etc.) separately. Multiple incidents involving the same vehicles are to be counted separately. Multiple reports of the same incident are also to be counted separately (i.e., a consumer complaint and a field report involving the same incident in which a crash occurred are to be counted as a crash report, a field report and a consumer complaint).

In addition, for items "c" through "f", provide a summary description of the alleged problem and causal and contributing factors and Subaru's assessment of the problem, with a summary of the significant underlying facts and evidence. For items "e" and "f", identify the parties to the action, as well as the caption, court, docket number, and date on which the complaint or other document initiating the action was filed.

Subaru response:

- a. Consumer complaints: **205**
- b. Field reports, including dealer field reports: **309**
- c. Reports involving a crash, injury, or fatality, based on claims against Subaru involving a death or injury, or notices received by Subaru alleging or proving that a death or injury was caused by the alleged defect in a subject vehicle: **0**
- d. Property damage claims: **0**
- e. Third-party arbitration proceedings where Subaru is or was a defendant or codefendant: **0**
- f. Lawsuits, both pending and closed, in which Subaru is or was a defendant or codefendant: **0**

The information was sourced from SOA's Customer Service System (response to items (a), (c), and (d)), Quality Monitoring Report system (response to item (b)), Technical Helpline system (response to item (b)) and Legal Department (response to items (c)-(f)). The last date the information was gathered was May 13, 2015.

3. Separately, for each item (complaint, report, claim, notice, or matter) within the scope of your response to Request No. 2, state the following information:
 - a. Subaru's file number or other identifier used;
 - b. The category of the item, as identified in Request No. 2 (i.e., consumer complaint, field report, etc.);
 - c. Vehicle owner's name, address, and telephone number;
 - d. Vehicle's VIN
 - e. Vehicle's date of manufacture;
 - f. Vehicle's mileage at the time of the incident;
 - g. Incident date (in "yyyy/mm/dd" date format);
 - h. Report or claim date (in "yyyy/mm/dd" date format);
 - i. The stature (weight and height) of the occupant of the passenger seat;
 - j. Whether a crash is alleged;
 - k. Whether property damage is alleged;
 - l. Number of alleged injuries; and
 - m. Number of alleged fatalities.

Provide this information in Microsoft Access 2010, or a compatible format, entitled "REQUEST NUMBER TWO DATA."

Subaru response:

Enclosed on "Disc 1" is an Access file named "PE15-012" with a table entitled "REQUEST NUMBER TWO DATA" with the requested data "a" through "m".

The information was sourced from SOA's Customer Service System, Quality Monitoring Report system, Technical Helpline system and Legal Department. The last date the information was gathered was May 13, 2015.

6. Describe in detail the search criteria used by Subaru to identify the claims identified in response to Request No. 5, including the labor operations, problem codes, part numbers and any other pertinent parameters used. Provide a list of all labor operations, labor operation descriptions, problem codes, and problem code descriptions applicable to the alleged defect in the subject vehicles. State the terms of new vehicle warranty coverage offered by Subaru on the subject vehicles (i.e., the number of months for which coverage is provided and the vehicle systems that are covered). Describe any extended warranty coverage option(s) related to the alleged defect that Subaru offered for the subject vehicles and state by option, model, and model year, the number of vehicles that are covered under each such extended warranty.

Subaru response:

Search Criteria for Claims

1. Included all claims coded with failure code 'URC' (ODS Occupant Control Unit).
2. Included all claims coded with failure code 'YMA' (Seat Cushion Assembly which includes the ODS OCU).
3. Included all 'no problem found' claims that could be related to an ODS issue:
 - a. Trouble code '85' (Operating as designed)
 - b. Trouble code '00' (Concern not duplicated)
 - c. Manual review of failure code and claim comments to determine if the claim may be related to the ODS. Enclosed on "Disc 2" is a folder named "Question no. 6" with the PDF file named "Customer Concern_No Repair Made Failure Code Chart" for coding details.
4. Fuji Heavy Industries (FHI) provided all related claim data from Puerto Rico (12 claims) and Guam (0 claims).

Related Labor Operations

- Labor operation number 25199 (Puerto Rico claims only. Miscellaneous labor operation)
- Labor operation number 820201 (Air Bag System Testing)
- Labor operation number 820490 (Remove and Replace Impreza OCU)
- Labor operation number 820496 (Remove and Replace ODS Control Module, Load Cell &/or Harness)
- Labor operation number 913411 (Remove and Replace One Front Seat)
- Labor operation number 913414 (Remove and Replace Both Front Seats)
- Labor operation number 913421 (Remove and Replace One Front Seat Slide Rails)
- Labor operation number 913471 (Remove and Replace One Front Seat Cushion Cover, Pad/Frame)
- Labor operation number 913472 (Remove and Replace ODS Passenger Seat Cushion Frame & Slide Rail Assembly).
- Labor operation number 913481 (Remove and Replace One Front Seat Back Cover, Pad/Frame)
- Labor operation number 913484 (Remove and Replace Both Front Seat Back Covers, Pad/Frame)
- Labor operation number 100009 (Customer Concern No Repair Made)
- Labor operation number 101108 (Sublet Repair, Administration Expenses)

The information was sourced from SOA's Claims system. The last date the information was gathered was May 13, 2015.

Related Problem Codes

- Failure code 'URC' (ODS Occupant Control Unit)
- Failure code 'YMA' (Seat Cushion Assembly which includes the ODS OCU)
- Problem code 'SC73' (Puerto Rico claims only. Warning light ON, Warning light blinks)
- Multiple failure codes for 'Customer Concern – No Repair Made'. Enclosed on "Disc 2" is a folder named "Question no. 6" with the PDF file named "Customer Concern_No Repair Made Failure Code Chart" for coding details

The information was sourced from SOA, Puerto Rico, and Guam's Claims system. The last date the information was gathered was May 20, 2015.

Terms of New Vehicle Warranty Coverage for 2012 model year Impreza Vehicles

Warranty coverage information, applying to Subaru of America, inc. 2012 model year vehicles, was retrieved on May 13, 2015 from Section 8.3.13 of the Subaru Claims Policies and Procedures Manual (last update date May 5, 2015). This is enclosed on "Disc 2" in a folder named "Question no. 6" with the PDF file named "Subaru Claims Policies and Procedures Manual (Section 8.3.13)" Also included for reference is a copy of Subaru of America's Warranty and Maintenance booklet for the 2012 model year. This is enclosed on "Disc 2" is a folder named "Question no. 6" with the PDF file named "SOA 2012 Warranty and Maintenance Booklet"

Warranty coverage information, applying to Puerto Rico and Guam 2012 model year vehicles, was retrieved from FHI's distributors on May 19, 2015. This is enclosed on "Disc 2" in a folder named "Question no. 6" with the PDF files named "PUERTO RICO 2012 Subaru Warranty and Maintenance Booklet" and "GUAM 2012 Subaru Warranty and Maintenance Booklet"

There is no extended warranty coverage related to the alleged defect.

7. Produce copies of all service, warranty, and other documents that relate to, or may relate to, the alleged defect in the subject vehicles that Subaru has issued to any retailers or distributors, regional or zone offices, or other such entities. This includes, but is not limited to, bulletins, advisories, informational documents, training documents, or other documents or communications to or for Subaru customer service representatives, or consumers. Also include the latest draft copy of any of the above described documents that Subaru is planning to issue within the next 120 days.

Subaru response:

The following publication information was identified by the Subaru of America, Inc. Service Department.

These files are enclosed on "Disc 2" in a folder named "Question no. 7"

- Technical Service Bulletin 17-16-12
- 2012 Impreza New Technology Training/Technician Reference Booklet (pages 58-62)
- ODS section of Service Manual number G1120BE
- August 2, 2012 dealer announcement
- December 2013 TechTIPS Newsletter (see article on page 4)
- Supplemental Restraint Systems/Technician Reference Booklet (pages 51-55)

The information was sourced from the Subaru Technical Information System and from subarunet.com (Subaru's website for communication to dealers). The last date the information was gathered was May 13, 2015.

If you need any additional information or have any questions, please do not hesitate to contact me at (443) 430-3619.



Maurice Arcangeli
Director, Government Relations

Enclosures (two copies):

- CD - Disc 1
- CD - Disc 2