



Fuji Heavy Industries U.S.A., Inc.
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June 4, 2015

Ref. No.: GR15-024

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-212jfa/PE15-012 2012MY Subaru Impreza (except WRX/STI) Occupant Control Units (OCU)
(Second Submission)**

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 our second submission, and includes a complete response for question no.'s 4-5. Our third response, due June 19th, will cover 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.

A handwritten signature in black ink, appearing to be "K. J. Yon".

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NATIONAL HIGHWAY TRAFFIC SAFETY ADMINISTRATION
WASHINGTON, DC 20590

4. **Produce copies of all documents related to each item within the scope of Request No. 2. Organize the documents separately by category (i.e., consumer complaints, field reports, etc.) and describe the method Subaru used for organizing the documents.**

Subaru response:

Enclosed on "Disc 3" is a folder named "Question no. 4" with subfolders containing the requested documents for the following categories:

- Consumer complaints
- Field reports

The file names within these subfolders references the "File Number" previously provided (see Access file on "Disc 1" from our first response dated May 22, 2015). For your convenience, a copy of that same Access file is included on "Disc 3."

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.

5. **State a total count for all of the following categories of claims, collectively, that have been paid by Subaru that relate to, or may relate to, the alleged defect in the subject vehicles: warranty claims; extended warranty claims; claims for good will services that were provided; or similar adjustments and reimbursements; and warranty claims or repairs made in accordance with a procedure specified in a technical service bulletin, customer satisfaction campaign, or other such activity.**

Separately, for each such claim, state the following information:

- Subaru's claim number;
- Vehicle owner's name and telephone number;
- VIN;
- Vehicle's date of manufacture(in "yyyy/mm/dd" date format);
- Vehicle's mileage at the time of the incident;
- Repairing facility's name, telephone number, city and state or ZIP code;
- Labor operation number;
- Problem code;
- Diagnostic trouble code;
- Replacement part number(s) and description(s);
- Concern stated by the customer; and
- Comment, if any, by the technician or person(s) making the repair, and/or the person(s) processing the claim that relate to the claim and/or repair.

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

Subaru response:

As of May 13, 2015, Subaru has paid **2,561** claims possibly related to the alleged defect in the subject vehicles.

Enclosed on "Disc 3" is a folder named "Question no. 5" with an Access file named "PE15-012 - WARRANTY DATA." This file includes a table entitled "WARRANTY DATA" with the requested data "a" through "l" for each claim.

The information was sourced from SOA's Claims system. 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 John Frooshani at (443) 430-3619.

A handwritten signature in black ink, appearing to read "Maurice Arcangeli". The signature is stylized with a long horizontal line extending to the right.

Maurice Arcangeli
Director, Government Relations

Enclosures (two copies):

- CD - Disc 3