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OFFICE OF
SAFETY

Mr. Thomas Z. Cooper, Chief
Vehicle Integrity Division
Office of Defects Investigation, Safety Assurance
National Highway Traffic Safety Administration
400 Seventh Street, S.W.
Washington, D. C. 20590

February 16, 2005
Ref.# GR05-009

RE: NVS-212-pco, PE04-081

Dear Mr. Cooper

This is in response to your letter of January 19, 2005 concerning the performance of side-impact airbag/curtains in certain model year 2001-2003 VW Jetta, Golf and GTI vehicles and your request for "peer" information on MY 2003 Subaru Forester vehicles. Two copies of this response are provided per your request.

In accordance with your request, we have repeated each question verbatim before the response.

- 1) *State, by model and model year, the number of the subject peer vehicles Subaru has manufactured for sale or lease in the United States. If there are multiple side air bag system designs or versions for a given subject peer vehicle, please identify under section "e". Separately, for each model subject vehicle manufactured to date by Subaru, state the following:*
 - a. *Vehicle identification number (VIN);*
 - b. *Make;*
 - c. *Model;*
 - d. *Model year;*
 - e. *Airbag system model version (if more than one);*
 - f. *Date of manufacture;*
 - g. *Date warranty coverage commenced; and*
 - h. *The State in the United States where the vehicle was originally sold or leased (or delivered for sale or lease).*

Provide the table in Microsoft Access 2000, or a compatible format, entitled "PRODUCTION DATA".

Response 1:

The 2003 MY Subaru Forester was the first Subaru vehicle to meet the criteria of having a combination side impact thorax/head protection air bag. A total of 66,768 Forester vehicles, MY 2003 were manufactured for sale or lease in the United States. Only one type side air bag system is used on all 2003 MY Forester vehicles. The information requested in a, f, g and h has been included in the attached CD Rom (Appendix 1) in Microsoft Access 2000 format.

2. State 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 subject condition in the subject peer vehicles:

- a. Consumer complaints, including those from fleet operators;*
- b. Field reports, including dealer field reports;*
- c. Reports involving a crash, injury, or fatality, based on claims against the manufacturer involving a death or injury, notices received by the manufacturer alleging or proving that a death or injury was caused by a possible defect in a subject vehicle, property damage claims, consumer complaints, or field reports;*
- d. Property damage claims (including own vehicle);*
- e. Third-party arbitration proceedings where Subaru is or was a party to the arbitration; 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 vehicle 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). Identify reports that have a duplicate with either other mfg reports/claims or with ODI.

In addition, for items "b" 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 along with any photographs and airbag control module diagnostic result/readout/printout (along with explanation/description). For items f and g, 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.

Response 2:

Subaru conducted a search of files and databases by several different internal departments during the week of January 24, 2005, for inadvertent deployment of side-impact air bags, where there was no side crash. The results are listed below:

- a. 0
- b. 0
- c. 0
- d. 0
- e. 0
- f. 0

3. *State, by model and model year, the number and total count for all of the following categories of claims, collectively, that have been paid by Subaru to date that relate to, or may relate to, the subject condition in the subject peer vehicles: warranty claims; extended warranty claims; claims for good will services that were provided; field, zone, or similar adjustments and reimbursements; and warranty claims or repairs made in accordance with a procedure specified in a technical service bulletin or customer satisfaction campaign.*

Provide this information in Microsoft Excel table, or a compatible format, entitled "WARRANTY DATA COUNT".

Response 3:

A search of our Warranty Database indicates that Subaru has never received a Warranty claim, extended Warranty claim, "Goodwill" adjustment or any other such claim for inadvertent side air bag deployment therefore, we have not attached an Excel table for "Warranty Data Count".

There has been only one Subaru Service Bulletin issued concerning side airbags. Subaru Service Bulletin Number 17-07-04 concerning Trouble Code 41 and 42 in the Diagnostic System of the SRS Side Air Bag System was issued August 12, 2004. It provides repair instructions for surface oxidation on the contacts of the connectors of the SRS side air bag system. However, this condition will not cause an inadvertent deployment of side air bags.

4. Describe in detail the search criteria used by Subaru to identify the claims identified in response to Request No. 3, 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 subject condition in the subject peer vehicles. State, by make and model year, the terms of the new vehicle warranty coverage offered by Subaru on the subject peer vehicles (i.e., the number of months and mileage for which coverage is provided and the vehicle systems that are covered) and if it covers inadvertent side-airbag deployments (without an actual side crash, but sensors did sense a shock pulse). Describe any extended warranty coverage option(s) that Subaru offered for the subject peer vehicles and state by option, model, and model year, the number of vehicles that are covered under each such extended warranty and if it covers inadvertent side-airbag deployments.

Response 4:

Subaru selected the following fail codes to search for claims and field reports applicable to this issue:

<u>FAIL CODE</u>	<u>FAIL CODE DESCRIPTION</u>
ULQ	Right Side Air Bag Module
ULR	Left Side Air Bag Module
ULS	Right Side Air Bag Sensor
ULT	Right Side Sensor Wire Harness
ULU	Left Side Air Bag Sensor
ULV	Left Side Sensor Wire Harness

<u>PART NUMBERS</u>	<u>DESCRIPTION</u>
98201SA020	Right Side Air Bag Module
98201SA030	Left Side Air Bag Module
98235SA020	Right Side Sensor
98235SA030	Left Side Sensor
98221SA030 & 98221SA031	Side Air Bag Control Unit (the shape of the mounting bracket was changed during production)
98241FC110	Side Air Bag Harness

5. Provide a table showing the following information concerning the side-impact airbag systems in the subject peer vehicles by model and model year:
- type of side air bag system (thorax, head, curtain or combination thereof);
 - location of each seating position at which a side air bag system is installed;
 - the number of side air bags at each of those seating positions; and
 - bag location (seat mounted, door mounted, etc.).

Response 5.

The 2003 MY Forester is the only one equipped with side air bags with thorax/head protection among the 2001 through 2003 Subaru vehicles which are the subject of this review.

2003MY Forester	a. type of side air bag system (thorax, head, curtain or combination thereof);	Thorax & head air bags (Standard equipment).
	b. location of each seating position at which a side air bag system is installed;	Driver side seat & passenger side seat.
	c. the number of side air bags at each of those seating positions;	One for each.
	d. bag location (seat mounted, door mounted, etc.)	Seat mounted.

6. For each model, model year of the subject peer vehicles, identify the supplier of the side-impact crash sensing system and electronic restraint module. Please provide a complete street address, contact name, and telephone number for each supplier identified.

Response 6.

The supplier of the side airbag sensors and ECU is:

DENSO CORPORATION
1-1 Showa-Cho, Kariya, Aichi-Prefecture
448-8661 JAPAN

Managing Official: Minoru Ohta

Telephone: 0566-25-5513

Should you have any further questions concerning this issue, please contact me at (856) 488-3226.

Sincerely,



Gerald Plante

General Manager-Government Relations
FUJI HEAVY INDUSTRIES U.S.A., INC.

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Appendix 1