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June 10, 2009
Ref. No.: GR09-028

Mr. Thomas Cooper
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-212pco/PE09-017 2002-2004 Subaru WRX and STI Fuel Line Leakage Follow-up for Items 8 and 13 and Item 1 from March 25th Additional Request

Dear Mr. Cooper,
This letter is a follow-up by Subaru of America, Inc. (Subaru, SOA) to our initial partial response to items 8 and 13, and also item 1 from the March 25th additional request.

At the time of original submission on May 14th FHI was still under the impression that the Impreza WRX vehicle was experiencing a seepage issue only. In our partial response dated May 14, 2009 we also stated that we would need an additional 2 to 3 weeks for completion of items 8 and 13.

Upon receiving the latest video of the WRX showing a leak situation (May 13th), FHI is re-evaluating the situation.

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

8. **Describe by model and engine size/aspiration, all assessments, analyses, tests, test results, studies, surveys, simulations, investigations, inquiries and/or evaluations (collectively, "actions") that relate to, or may relate to, the alleged defect in the subject vehicles that have been conducted, are being conducted, are planned, or are being planned by, or for, Subaru. Include any assessment or limitations associated with the utilization of a constant tension hose clamp, using a double clamp system or orienting the clamps (or changing the head design) such that they can be assessable for adjustments without major disassembly. For each such action, provide the following information (in chronological order):**

a. **Action title or identifier;**
b. **The actual or planned start date;**

c. The actual or expected end date;
d. Brief summary of the subject and objective of the action;
e. Engineering group(s)/supplier(s) responsible for designing and for conducting the action;
f. A brief summary of the findings and/or conclusions resulting from the action, and
g. Model and engine size/aspiration.

For each action identified, provide copies of all documents related to the action, regardless of whether the documents are in interim, draft, or final form. Organize the documents chronologically by action.

To accomplish this task we are searching for customers with the smell condition and have not had a repair made. Since the condition seems to occur only when it is cold, it is an added challenge to locate the required vehicles. We are also assembling a kit of parts which would be needed to replace the parts removed from these customer vehicles. We intend to retrieve the complete intake and fuel systems from the vehicle, undisturbed, so that testing in Japan can be done by FHI on the system.

13. Furnish Subaru's assessment of the alleged defect in the subject vehicle, including:

a. The causal or contributory factor(s);
b. The failure mechanism(s);
c. The failure mode(s);
d. The risk to motor vehicle safety that it poses;
e. What warnings, if any, the operator and the other persons both inside and outside the vehicle would have that the alleged defect was occurring or subject component was malfunctioning; and
f. The reports included with this inquiry.

In light of the additional information received from NHTSA (video of WRX), Subaru has reconsidered its original assessment for response 13. As described in response 8 above, we are evaluating ways to determine the potential for actual fuel leaks. We expect this to take several months.

1. Provide a pressure-time profile at the subject component throughout the vehicle operation cycle. As a minimum, the nominal and maximum pressures under ambient temperature 68° F± 5° F, for the following operation conditions shall be included:

Overnight-storage condition;
Ignition key-on (prior to cranking) condition;
Engine cranking condition (cold start);
Engine idling condition (cold start);
Engine at half throttle condition; and
Engine at full throttle condition.

If the pressure profile is different for a cold ambient temperature starting condition (i.e. 32° F and below), please also provide.

Since FHI does not keep a record of the pressure-time profiles, we will procure the test vehicle needed and measure the requested pressures to respond to the request. The schedule is undetermined at this point.

Regrettably, this is the most information we can provide at this time. We are open to your decision on how to go forward given the additional time Subaru needs for an assessment.

If there are any questions, please contact me at (856)488-3115.

Sincerely,

Maurice Arcangeli
Government Relations
Fuji Heavy Industries USA, Inc.

Cc: Jerry Plante