



**Fuji Heavy Industries U.S.A., Inc.**  
c/o Subaru of America  
Subaru Plaza  
PO Box 6000  
Cherry Hill, NJ 08034-6000  
856-488-8500  
856-488-8669 fax

December 5, 2014  
Ref. No.: GR14-084

Office of the Chief Counsel (NCC-111)  
National Highway Traffic Safety Administration  
1200 New Jersey Avenue, S.E.  
West Building, Room W41-326  
Washington, DC 20590

**Subaru Response to NHTSA General Order re: "PE14-016, Air Bag Inflator Rupture"**

Fuji Heavy Industries Ltd., on behalf of Subaru of America, hereby submits the enclosed in response to a General Order letter dated November 18, 2014 specific to "PE14-016, Air Bag Inflator Rupture."

Subaru appreciates the severity and urgency of this matter. We will continue to support the collective goal of quickly and effectively remedying the risk to motor vehicle safety that certain Takata air bag inflators may pose to the driving public. In the interest of the safety of our customers, Subaru is working aggressively to pursue all affected owners in order to repair as many vehicles as quickly as possible, and is actively collecting the recalled inflators to assist in the ongoing investigation.

We hope the enclosed responses to this General Order are helpful. If you have any questions, or need anything else, please do not hesitate to contact me.

Sincerely,

A handwritten signature in black ink, appearing to read "Masashi Takahashi".

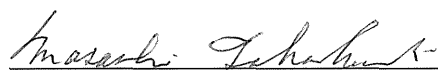
Masashi Takahashi  
Corporate Vice President, Subaru Quality Assurance Division  
Fuji Heavy Industries Ltd.

## AFFIDAVIT

I, Masashi Takahashi, state as follows:

- (1) I am Masahi Takahashi, Corporate Vice President for Subaru Quality Assurance Division, and I am authorized by Fuji Heavy Industries Ltd. to execute this affidavit on its behalf;
- (2) I certify that (1) I have undertaken and directed an inquiry reasonably calculated to assure that the answers and production of documents are complete and correct, (2) I have caused the documents of Subaru to be searched diligently for information and documents responsive to this General Order and produced them to NHTSA, and (3) the answers to the inquiries provided to NHTSA respond completely and correctly to this General Order.

Executed on this the 5<sup>th</sup> day of December 2014.



---

Masashi Takahashi  
Corporate Vice President, Subaru Quality Assurance Division  
Fuji Heavy Industries Ltd.

**Subaru Response to NHTSA General Order re: “PE14-016, Air Bag Inflator Rupture”**

1. **File a report that describes, in detail, all completed, ongoing or planned testing of Takata inflators outside of the HAH Region. At a minimum, your report must include, but should not be limited to, the following:**

- a. **All documents regarding or relating to the testing contained in your report;**

**Subaru Response:**

As a result of Subaru campaigns to address passenger airbag inflators manufactured by Takata (Subaru Campaign No.'s WQL-48 and WQM-49), Subaru dealers have collected approximately 3,000 inflators. However, Takata is currently prioritizing testing of passenger air bag inflators from Florida. Thus, no testing has been performed on non-HAH region Takata passenger air bag inflators and therefore, no documentation exists at this time.

Source of information: Takata Corporation, except quantity of inflators identified above, which was sourced from Subaru of America's campaign completion report

Last date information gathered: 11/18/2014, except quantity of inflators identified above, which was updated as of 12/03/2014

Confirm whether there are responsive documents no longer in Subaru's possession: n/a (no responsive documents submitted)

- b. **The location of the testing; the dates of the testing; whether the testing is completed, in progress, or planned; anticipated date of completion of testing; the nature and objective of the testing; and, testing protocols;**

**Subaru Response:**

Subaru was informed of Takata's intent to test non-HAH region passenger air bag inflators, but has not yet received a specific test plan from Takata. Therefore, information regarding location, actual and/or anticipated dates, nature and objective, and specific protocols related to testing are not available at this time.

Source of information: Takata Corporation

Last date information gathered: 11/18/2014

Confirm whether there are responsive documents no longer in Subaru's possession: n/a (no responsive documents submitted)

- c. A roster of all vehicles where the inflator was tested which includes: the model; model year; vehicle build date; VIN; the vehicle's registration history, by location; inflator serial number; inflator type; dealership location with zip code where the inflator unit was returned; whether any deaths, injuries or claims are associated with the inflator in the vehicle; and, product specifications for the air bag and inflator modules in each vehicle.

**Subaru Response:**

Per Subaru's response to question 1(a) above, no testing has been performed on non-HAH region Takata passenger air bag inflators.

Source of information: Takata Corporation

Last date information gathered: 11/18/2014

Confirm whether there are responsive documents no longer in Subaru's possession: n/a (no responsive documents submitted)

- d. If testing of inflators has been completed, describe in detail the results of the testing and the conclusions you have reached based upon the test results. If your conclusion is that a safety defect does not exist in inflators outside of the HAH Region, describe in detail the basis for that conclusion and when the decision was made and by whom. Provide a copy of all documents to or from any person(s) related to the conclusion that no safety defect exists in inflators outside of the HAH Region.

**Subaru Response:**

Per Subaru's response to question 1(a) above, no testing has been performed on non-HAH region Takata passenger air bag inflators.

Source of information: Takata Corporation

Last date information gathered: 11/18/2014

Confirm whether there are responsive documents no longer in Subaru's possession: n/a (no responsive documents submitted)

- e. **Sub-part (e) is directed to BMW, Chrysler, Ford, GM, Honda, Mazda, Mitsubishi, Nissan, Subaru and Toyota: State in your report whether or not Takata has performed testing of inflators used in your vehicles outside the HAH Region. If so, describe in detail what Takata has communicated to you about the testing and/or test results. Produce all documents related to Takata's testing, test results and your communications, internal and external, related to the testing. State whether you have requested additional information from Takata concerning its testing of inflators outside of the HAH Region which you believe would assist in your determination of whether a defect exists. Identify and describe any information, documents or categories of information and documents that you reasonably believe that Takata has or reasonably should have concerning inflators or testing of inflators used in your vehicles that Takata has not provided you and which you believe would assist you in testing inflators to determine whether a safety defect exists in inflators outside of the HAH Region.**

**Subaru Response:**

Per Subaru's response to question 1(a) above, no testing has been performed on non-HAH region Takata passenger air bag inflators.

Source of information: Takata Corporation

Last date information gathered: 11/18/2014

Confirm whether there are responsive documents no longer in Subaru's possession: n/a (no responsive documents submitted)

- f. **Provide the name, title and complete contact information for each and every manager or supervisor (at all levels of management or supervisory responsibility) involved in your investigation and decision-making process concerning rupturing air bag inflators manufactured, in whole or in part, by Takata.**

**Subaru Response:**

There have been no reported cases of confirmed rupturing passenger air bag inflators manufactured by Takata in non-HAH regions. Therefore, no person(s) are involved in the investigation and decision-making process specific to non-HAH regions at this time.

Source of information: Takata Corporation

Last date information gathered: 11/18/2014

Confirm whether there are responsive documents no longer in Subaru's possession: n/a (no responsive documents submitted)

- g. Provide the name, title and complete contact information for each and every person who prepared and provided input and/or data included in the report contained in Request No. 1, including but not limited to inside or outside counsel, accountants, engineers, employees and other professionals.

Subaru Response

Name [REDACTED]

Title: General Manager of Quality Assurance Dept., SUBARU QUALITY ASSURANCE DIV.,  
FUJI HEAVY INDUSTRIES LTD.

Contact information: [REDACTED]

Address: 1-1 Subaru-cho, Ota-shi, Gunma-Ken, Japan 373-8555

Phone: [REDACTED]

Name: [REDACTED]

Title: General Manager of Quality Assurance Dept., SUBARU QUALITY ASSURANCE DIV.,  
FUJI HEAVY INDUSTRIES LTD.

Contact information: [REDACTED]

Address: 1-1 Subaru-cho, Ota-shi, Gunma-Ken, Japan 373-8555

Phone: [REDACTED]

Name: [REDACTED]

Title: Manager of Quality Assurance Dept., SUBARU QUALITY ASSURANCE DIV.,  
FUJI HEAVY INDUSTRIES LTD.

Contact information: [REDACTED]

Address: 1-20-8 Ebisu, Shibuya-ku, Tokyo, Japan 150-8554

Phone: [REDACTED]

Name: [REDACTED]

Title: Manager of Body Field Quality Sec., Quality Assurance Dept.,  
SUBARU QUALITY ASSURANCE DIV., FUJI HEAVY INDUSTRIES LTD.

Contact information: [REDACTED]

Address: 1-1 Subaru-cho, Ota-shi, Gunma-Ken, Japan 373-8555

Phone: [REDACTED]

Name: [REDACTED]  
Title: Manager of Quality Assurance Sec., Quality Assurance Dept.,  
SUBARU QUALITY ASSURANCE DIV., FUJI HEAVY INDUSTRIES LTD.  
Contact information: [REDACTED]  
Address: 1-1 Subaru-cho, Ota-shi, Gunma-Ken, Japan 373-8555  
Phone: [REDACTED]

Name: [REDACTED]  
Title: Assistant Manager of Body Field Quality Sec., Quality Assurance Dept.,  
SUBARU QUALITY ASSURANCE DIV., FUJI HEAVY INDUSTRIES LTD.  
Contact information: [REDACTED]  
Address: 1-1 Subaru-cho, Ota-shi, Gunma-Ken, Japan 373-8555  
Phone: [REDACTED]

Name: [REDACTED]  
Title: Assistant Manager of Quality Assurance Sec., Quality Assurance Dept.,  
SUBARU QUALITY ASSURANCE DIV., FUJI HEAVY INDUSTRIES LTD.  
Contact information: [REDACTED]  
Address: 1-1 Subaru-cho, Ota-shi, Gunma-Ken, Japan 373-8555  
Phone: [REDACTED]

Name: [REDACTED]  
Title: Director, Government Relations  
FUJI HEAVY INDUSTRIES U.S.A., Inc. (FUSA)  
Contact information: [REDACTED]  
Address: Subaru of America, Inc., P.O. Box 6000, Cherry Hill, NJ 08034-6000  
Phone: [REDACTED]

Name: [REDACTED]  
Title: Director, NA-Quality Assurance  
FUJI HEAVY INDUSTRIES U.S.A., Inc. (FUSA)  
Contact information: [REDACTED]  
Address: Subaru of America, Inc., P.O. Box 6000, Cherry Hill, NJ 08034-6000  
Phone: [REDACTED]

Name: [REDACTED]

Title: Campaign Manager, Government Relations

FUJI HEAVY INDUSTRIES U.S.A., Inc. (FUSA)

Contact information: [REDACTED]

Address: Subaru of America, Inc., P.O. Box 6000, Cherry Hill, NJ 08034-6000

Phone: [REDACTED]

Name: [REDACTED]

Title: Safety Activities Manager, Government Relations

FUJI HEAVY INDUSTRIES U.S.A., Inc. (FUSA)

Contact information: [REDACTED]

Address: 5950 Symphony Woods Road, Suite 410, Columbia, MD 21044

Phone: [REDACTED]

Source of information: 12/05/2014

Last date information gathered: FUJI HEAVY INDUSTRIES LTD. and FUJI HEAVY INDUSTRIES U.S.A., Inc. (FUSA)

Confirm whether there are responsive documents no longer in Subaru's possession: n/a (no responsive documents submitted)