

SUBARU

FUJI HEAVY INDUSTRIES U.S.A., INC.

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2004 JUL 14 AM 11:30
July 9, 2004
OFFICE OF DEFECTS INVESTIGATION
Ref. No. GR04-037C

Mr. Kenneth N. Weinstein
Associate Administrator for Safety Assurance - NSA-01
National Highway Traffic Safety Administration
400 Seventh Street, S.W.
Washington, D.C. 20590

04V-342


Re: **2002-2003MY Subaru Impreza Sedan/Wagon LH Drivers Side Seat Slide Bolt; Part 573, Defect Information Report**

Dear Mr. Weinstein:

In accordance with the requirements of the National Traffic and Motor Vehicle Safety Act of 1966 and 49 CFR Part 573, Fuji Heavy Industries U.S.A., Inc. ["Subaru"] hereby submits a Defect Information Report (DIR) concerning a safety recall of certain 2002-2003MY Subaru Impreza Sedan/Wagon vehicles to address a possible loose or missing seat slide rail retaining bolt on the drivers side front seat. Should you have any questions about this report, please contact me at (856) 488-8644.

Sincerely,

Fuji Heavy Industries U.S.A., INC.


Don Bearden, Director
Government Relations

cc: K. DeMeter

DB:ds
Attachment

DEFECT INFORMATION REPORT

1. Vehicle Manufacturer Name:

Fuji Heavy Industries Ltd. ["FHI"]
1-7-2 Nishi-Shinjuku
Shinjuku-ku
Tokyo 160-8316, Japan

Affiliated U.S. Sales Company:

Subaru of America, Inc. ["SOA"]
Subaru Plaza
P.O. Box 6000
Cherry Hill, NJ 08034-6000

2. Identification of Affected Vehicles:

Based on vehicle production records, we have determined the affected vehicle population as follows:

Make/Model: Subaru Impreza Sedan and Wagon

Model year: 2002 and 2003

Production dates: September 22, 2000 through December 20, 2002

VIN Range:

2002MY Impreza Sedan/Wagon

Sedan	JF1GD***2*500015 through 531625
Wagon	JF1GG***2*800021 through 837226

2003MY Impreza Sedan/Wagon

Sedan	JF1GD***3*500001 through 513811
Wagon	JF1GG***3*800001 through 814065

Note 1. Although the involved vehicles are within the above VIN ranges, not all vehicles in these ranges were sold in the U.S.

Note 2. Various characters may occupy the VIN positions identified by "**

Component Supplier

NHK SPRING CO., LTD.
3-10 Fukuura, Kanazawa-ku, Yokohama
236-0004 JAPAN
Phone: 045-786-7511

3. Total Number of Vehicles Potentially Affected:

84,574 Impreza vehicles are potentially affected.

4. Percentage of Vehicles Estimated to Actually Contain Defect:

Based on field data, it is estimated that about 0.2% of LH front seat slide rail bolts will loosen and in worst case but in a very small number of cases, the bolt may actually fall out of its mounting threads.

5. Description of Problem:

The left front bolt that retains the forward part of the drivers seat to the seat slide rail may loosen due to stress forces applied to the seat as the seat is used (from fore and aft motion when driver leans back on the seat back and downward motion while driver is seated and moving on the seat cushion). If the seat slide rail bolt loosens and eventually falls out, there is the possibility that the seat may separate from the seat slide in a crash, which might cause more severe injuries to the driver.

6. Chronology of Principal Events:

On March 29, 2003, FHI received the first field technical report from Subaru Canada, Inc. concerning the left hand seat rail retaining bolt loosening and falling out of the threads. FHI investigated the records management and maintenance procedures of specified bolt tightening torque during the affected production range at supplier through mid-May 2003. In addition, a replaced front seat was returned from Subaru Canada and investigated by FHI. Through August 2003, FHI reviewed the data records of bolt tightening torque at supplier. The production line equipment was duplicated to verify reliability of bolt tightening

procedure at supplier. During the next month, FHI was able to confirm that the bolt could loosen but could not duplicate the bolt falling out of the threads.

From January through June 2004, FHI conducted additional investigations in North America and collected another LH front seat for additional testing but still could not duplicate the rail bolt falling out of its threads.

Since FHI had examples of the seat rail bolt falling out of its threads in the field, on July 6, 2004, FHI reached a determination to recall the affected vehicles for this condition.

7. Description of Corrective Repair Action:

Subaru will obtain current owner name and address information from state motor vehicle registration records through R.L. Polk & Company to notify owners of the potentially affected vehicles by first class mail to return their vehicles to a Subaru dealer for installation of a new left hand driver's seat rail mounting bolt. This new bolt contains a thread locking substance on the threads to ensure that it cannot loosen.

Subaru will include instructions to owners, which are already on file with NHTSA, for owners to obtain reimbursement for any previously paid repairs for replacing or tightening the affected seat slide rail bolt.

8. Recall Schedule:

Dealers will be notified of this campaign within July 2004. Owner notification is expected to begin within 10 working days after dealer notification, as soon as the proper parts are available and the dealer repair procedures are completed and distributed.

Copies of the dealer repair procedures will be submitted as soon as they are available.