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February 6, 2007
Ref. No.: GR07-005

07V-043
(5 pages)

Mr. Daniel C. Smith
Associate Administrator for Enforcement, NVS-200
National Highway Traffic Safety Administration
400 Seventh Street, SW
Washington, DC 20590

RE: Part 573 Defect Information Report – 2006 Subaru Forester/Impreza Pinched Wire

Dear Mr. Smith,

In accordance with 49 CFR Part 573 Defect and Noncompliance Reports, Fuji Heavy Industries USA, Inc. on behalf of Subaru of America, Inc. and Fuji Heavy Industries, Ltd., submits the enclosed notification and report concerning a defect in the installation of a specific wiring harness on certain 2006 model year Subaru Forester and Impreza vehicles imported into the United States. Our internal designation for this recall campaign will be: WVC-13.

If you have any questions on the enclosed report, please contact me.

Sincerely,

Fuji Heavy Industries USA, Inc.



Gerald Plante, General Manager
Government Relations

Enclosure

cc: Fuji Heavy Industries, Ltd. (Japan)
Subaru of America, Inc. (Cherry Hill, NJ)

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OFFICE OF DEFECTS
INVESTIGATION/RMD

**Defect Information Report
49 CFR Part 573.6**

573.6(c)(1) – Manufacturer's Name

Vehicle Fabricating Manufacturer:

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

Designated U.S. Agency:

Fuji Heavy Industries USA, Inc.
Subaru Plaza, PO Box 6000
2235 Rt. 70W
Cherry Hill, NJ 08034-6000

573.6(c)(2)(i) – Identification of Vehicles Containing the Defect

Based on vehicle production records, we have determined from production dates that the recall affected passenger car population is as follows:

Make:	Subaru
Model Year(s):	2006
Model(s):	Forester and Impreza
Production Dates:	February 4, 2005 through June 28, 2005
VIN Ranges:	Forester: JF1SG6***6*700001 - JF1SG6***6*711059 Impreza (sedan): JF1GD**6*6*500001 - JF1GD**6*6*501320 (wagon): JF1GG**6*6*800008 – JF1GG**6*6*800726

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 occupy the VIN positions identified by "***".

573.6(c)(3) – Total Number of Vehicles Potentially Containing the Defect

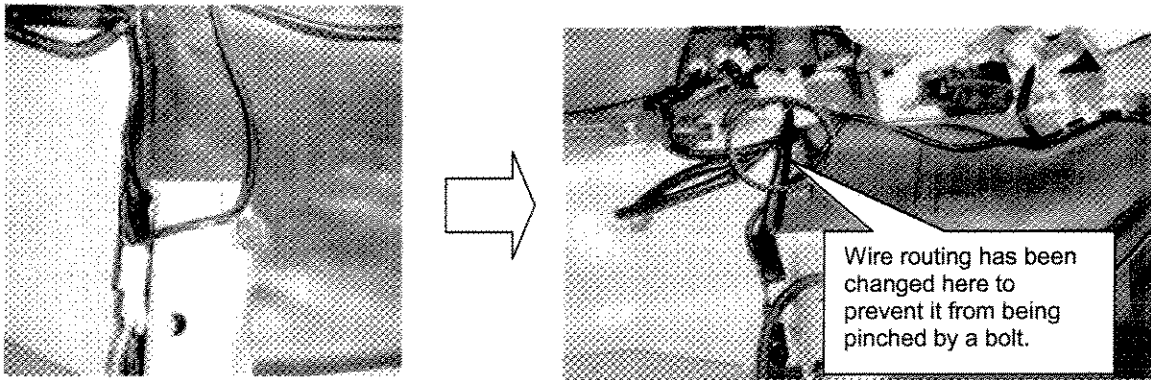
<u>Model</u>	<u>Year</u>	<u>Number of Vehicles Potentially Involved</u>
Forester	2006	5,471
Impreza	2006	<u>1,533</u>
		7,004

573.6(c)(4) – Percentage of Vehicles Estimated to Actually Contain the Defect

While it is not possible to determine an exact percentage, our investigation results indicate that very few vehicles (i.e., a small percentage) may have been produced with the suspect wiring incorrectly routed during vehicle assembly.

573.6(c)(5) – Description of the Defect

- (1) The wiring harness for the airbag occupant detection system in the front passenger seat could possibly have been pinched during the fastening of the seat installation bracket bolt. Pinching of the wiring harness between the floor cross member and the seat mounting bracket could result in a short circuit.



- (2) When 5 or 6 of the 7 bundled wires are broken, the short circuit could result in temperatures of up to 244° C. This is hot enough to cause smoking. After repeatedly turning on power to this short circuit, the temperature could increase to approximately 260° C.
- (3) With the above high temperatures, insulation and covering of the shorted wires will melt, enlarging the short until the circuit #3 fuse blows. The open circuit then created by the fuse stops the flow of electricity and the overheating.
- (4) The minimum ignition temperature of nearby carpeting is 400° C. Nothing beyond melting and smoke has occurred.

In the field occurrences, owners reported a burning at the front of the seat rail close to the front passenger side tunnel while the vehicles were parked in the parking lot. In Forester (but not Impreza) vehicles the short circuit and burning can occur with the ignition OFF. Regarding a warning for this condition, owners might be alerted by a blown fuse, illumination of the airbag MIL, and a front passenger airbag suppression indicator that always shows that the airbag is OFF.

573.6(c)(6) – Chronology of Principal Events

November 18, 2006: FHI received the first field technical report from Subaru of America, Inc. concerning burning at the front of the seat rail close to the front passenger side tunnel and started an investigation.

December 2006: Another field report of burning was also investigated and other cars were randomly inspected.

January 2007: Further analysis and testing of collected components indicated that incorrect routing of the occupant detection system wiring could be pinched at the front seat installation bracket bolt.

FHI's investigation found the following:

- (a) FHI discovered a memorandum from April 2005 raising a possibility that the occupant detection system (ODS) wiring harness could be pinched on the assembly line when the front passenger seat was installed. A change to the installation procedure was phased in on the two production lines so that the ODS wiring harness was routed behind another harness.
- (b) FHI also checked in-use cars to confirm dates of change in wire routing in the two production lines. From this investigation, FHI confirmed that 100% of Forester and Impreza vehicles from June 28, 2005 production had the modified wiring routing. Therefore, FHI made June 28, 2005 the recall population end date.

January 31, 2007: FHI reached a determination to recall the affected vehicles for this condition.

573.6(c)(8) – Description of the Manufacturer's Remedy Program

(i)
The remedy plan calls for dealers to inspect each affected vehicle to see if the wiring had been incorrectly routed under the seat bracket. If so, the dealer will repair any damaged wiring, re-route and secure the wiring harness in the correct location, and re-calibrate the occupant detection system as necessary.

All inspections and repairs will be at no charge to the owner. Dealers will be reimbursed for the labor and any parts by Subaru of America, Inc. upon submission of the usual recall claim.

All affected vehicles are assumed to be within the new car warranty coverage of 3 years/36,000 miles. The only known expense not already paid for by Subaru is one situation where the repair cost was shared between Subaru and the owner's insurance company. Subaru will follow up in this case with the insurance company. In any other cases, Subaru will follow the General Reimbursement Plan previously submitted to NHTSA under Part 573.13.

(ii)
Subaru of America, Inc. expects to notify U.S. dealers by the week of February 26th and include complete inspection and repair instructions. Owner notices are expected to be mailed the week of March 5, 2007.

Page 4

573.6(c)(10) – Submission of Recall Communications

Fuji Heavy Industries USA, Inc. will provide copies of all notices, bulletins, and other recall related communications within 5 days after their distribution.

573.6(c)(11) – Submission of Owner Notification Letter

A copy of the owner notification letter will be submitted at least 5 days prior to mailing.

573.6(c)(12) – Manufacturer's Campaign Number

Our identification code for this recall campaign will be: WVC-13