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March 17, 2010 Ref. No.: GR10-008

Mr. Daniel C. Smith Associate Administrator for Enforcement, NVS-200 National Highway Traffic Safety Administration Room W 45-306 1200 New Jersey Ave. SE Washington, DC 20590

RE: Part 573 Defect Information Report – 2010 Subaru Tribeca Door Latch Unintentional Disengagement

Dear Mr. Smith,

In accordance with 49 CFR Part 573 Defect and Noncompliance Responsibility and 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 door latch disengagement on certain 2010 model year Subaru Tribeca vehicles sold in the United States. Our internal designation for this recall campaign will be: WVO-25.

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

Sincerely,

Fuji Heavy Industries USA, Inc. Maurice Arcangeli, Director Government Relations

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Enclosure

cc: Fuji Heavy Industries, Ltd. (Japan)

Subaru of America, Inc. (Cherry Hill, NJ)

Defect Information Report (49 CFR Part 573.6)

573.6(c)(1) - Manufacturer's Name

Vehicle Fabricating Manufacturers:

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

Subaru of Indiana Automotive, Inc. ["SIA"] 5500 State Road 38 East Lafayette, Indiana 47903

Designated U.S. Agency:

Fuji Heavy Industries USA, Inc. 2235 Rt. 70 West Cherry Hill, NJ 08002

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): 2010

Model(s): Tribeca Vehicles

Production Dates: September 4, 2009 through March 8, 2010.

VIN Ranges: 2010 Tribeca: A4400199 - A4402124

(Last 8 Digits)

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

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

ModelYearNumber of Vehicles Potentially InvolvedTribeca20101.585

TOTAL 1,585

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

It is not possible to determine an estimated percentage. We have received only one technical report of the problem from another market.

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

- (1) A technical report that FHI received from another market indicated the following: While a customer drove the car, passenger-side front door opened unintentionally as the door latch was disengaged during door glass operation upward.
- (2) Production change giving rise to the problem: In 2010MY Tribeca production at SIA (Subaru-Indiana Automotive, Inc.) in the U.S.A., an insulator foam for vibration prevention was additionally installed to each of inner remote door handle and lock cables as the new audio system was introduced. Also, the inner remote door handle cable routing was changed to be closer to the door glass at the same time.

(3) Cause of the Defect

The two foam pads overlapped each other at a certain location within the regulator movement range, which resulted in insufficient gap between inner remote door handle cable and regulator which causes an interference.



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

March 8, 2010: FHI received the field technical report from the Subaru Distributor in Australia concerning unintentional door opening of the passenger-side front door.

March 9, 2010: The investigation of suspect phenomenon started at SIA and FHI.

March 13, 2010: FHI concluded its investigation and determined that this condition relates to motor vehicle safety; accordingly, FHI will conduct a recall campaign.

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

The remedy plan calls for dealers to remove insulator foam from the lock cable and to change routing of the inner remote door handle cable to the inner side of the vehicle to prevent the cable from interfering with the glass regulator. The repair will be performed on both the driver and passenger front doors.

All 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. Subaru incorporates by reference its existing 573.13 reimbursement plan on file with NHTSA.



(ii)
Subaru of America, Inc. expects to notify U.S. dealers around March 17, 2010 and include complete inspection and repair instructions. Owner notices are expected to be mailed on March 19, 2010.

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) - Manufacturer's Campaign Number

Our identification code for this recall campaign will be: WVO-25.

577.5(a) - Submission of Owner Notification Letter

A copy of the owner notification letter will be submitted to NHTSA's Recall Management Division at least 5 days prior to mailing.