



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

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October 12, 2011
Ref. No.: GR11-059

Associate Administrator for Enforcement
National Highway Traffic Safety Administration
Attention: Recall Management Division (NVS-215)
1200 New Jersey Ave. SE
Washington, DC 20590

RE: Part 573 Defect Information Report – Front Lower Control Arm (Transverse Link) Corrosion on 2002 through 2007 Subaru Impreza, 2003 through 2008 Subaru Forester, and 2005 through 2006 Saab 9-2x Vehicles

Dear Associate Administrator for Enforcement,

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 Front Lower Control Arms (Transverse Link) on certain 2002 through 2007 Subaru Impreza, 2003 through 2008 Subaru Forester, and 2005 through 2006 Saab 9-2x vehicles, which were sold in the United States. Our internal designation for this recall campaign will be: WVX-34.

Note: The enclosed updates our previous response dated September 9, 2011 (Ref. No. GR11-051).

If you have any questions on the enclosed report, please contact me at (410) 884-4075 or jfro@subaru.com.

Sincerely,

A handwritten signature in black ink, appearing to read "John Frooshani".

John Frooshani
Safety Activities Manager
Government Relations
Fuji Heavy Industries USA, Inc.

Enclosure

cc: Fuji Heavy Industries, Ltd. (Japan)

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

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): 2002 through 2007 (Subaru Impreza), 2003 through 2008 (Subaru Forester), and 2005 through 2006 (Saab 9-2x)

Model(s): Subaru Impreza, Subaru Forester, and Saab 9-2x Vehicles

Production Dates: September 5, 2000 through November 26, 2007.

'02 -'07MY Subaru Impreza Vehicles				
		VIN Ranges		Remark
		From	To	
2002MY	Sedan	JF1GD29652G500015	JF1GD29682H531625	Among these VINs, only vehicles which were originally sold or are currently registered in the 20 salt belt states plus D.C. will be involved in the recall. <20 States> MA, MD, MI, NH, NY, PA, VT, WI, CT, DE, IA, IL, IN, ME, MN, MO, NJ, OH, RI, WV plus D.C.
	Wagon	JF1GG68582H800021	JF1GG29652G837226	
2003MY	Sedan	JF1GD29633G500001	JF1GD29613H513811	
	Wagon	JF1GG68503H800001	JF1GG68583H814065	
2004MY	Sedan	JF1GD29614G500001	JF1GD29654G525189	
	Wagon	JF1GG68594H800001	JF1GG65514G821872	
2005MY	Sedan	JF1GD67585G500001	JF1GD67545H526332	
	Wagon	JF1GG67555H800001	JF1GG68565G818981	
2006MY	Sedan	JF1GD676X6G500009	JF1GD676X6H526779	
	Wagon	JF1GG67636H800007	JF1GG68616H822263	
2007MY	Sedan	JF1GD61647G500002	JF1GD61637H526052	
	Wagon	JF1GG63637H800001	JF1GG61657H819619	

'03 -'08MY Subaru Forester Vehicles				
		VIN Ranges		Remark
		From	To	
2003MY		JF1SG65653H700001	JF1SG65693H772626	Among these VINs, only vehicles which were originally sold or are currently registered in the 20 salt belt states plus D.C. will be involved in the recall. <20 States> MA, MD, MI, NH, NY, PA, VT, WI, CT, DE, IA, IL, IN, ME, MN, MO, NJ, OH, RI, WV plus D.C.
2004MY		JF1SG69624H700002	JF1SG65654H768073	
2005MY		JF1SG67685G700001	JF1SG636X5H755629	
2006MY		JF1SG65626G700001	JF1SG65676H760060	
2007MY		JF1SG67617H700001	JF1SG63617H748362	
2008MY		JF1SG66628G700002	JF1SG63668H733308	

'05 -'06MY Saab 9-2x Vehicles				
		VIN Ranges		Remark
		From	To	
2005MY		JF4GG****5*050001	JF4GG****5*058514	Among these VINs, only vehicles which were originally sold or are currently registered in the 20 salt belt states plus D.C. will be involved in the recall.
2006MY		JF4GG****6*050001	JF4GG****6*051833	<20 States> MA, MD, MI, NH, NY, PA, VT, WI, CT, DE, IA, IL, IN, ME, MN, MO, NJ, OH, RI, WV plus D.C.
Note: Various characters occupy the VIN positions identified by "*".				

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

Based on existing records regarding vehicles originally sold or currently registered in the “salt belt” states (20 states and the District of Columbia), approximately 104,981 Subaru Impreza, 179,795 Subaru Forester, and 10,347 Saab 9-2x vehicles are potentially affected. The exact number will be determined after receipt of the R.L. Polk owner registration database, and will be included in our first quarterly completion report.

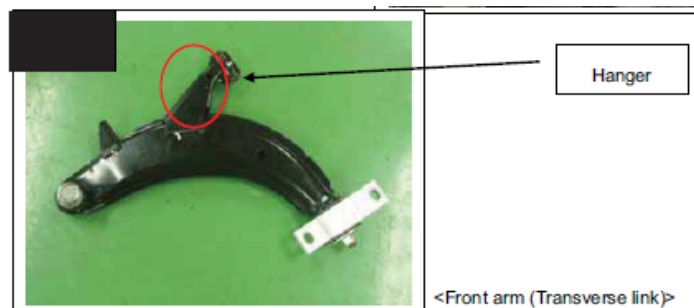
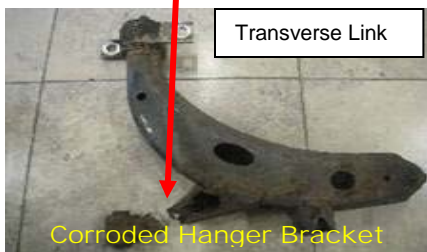
573.6(c)(4) - Percentage of Vehicles Estimated to Actually Contain the Defect

Although the percentage of vehicles within the affected “salt belt” states area likely to actually experience the failure is unknown, testing and either treatment or replacement will be performed on the affected vehicles.

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

(1) Evaluation result of returned parts

- a) The front lower control arms are broken at hanger brackets due to corrosion.
- b) Corrosion progression exceeding our expectation was observed at the hanger bracket.
- c) Drain hole was clogged and abnormal corrosion developed from inside of hanger bracket.
- d) Other than the hanger bracket, no corrosion progression exceeding our expectation was observed on the front lower control arm body.



(2) Failure occurrence mechanism

- a) Hanger bracket is exposed to salty and humid environments for a long period of time under road conditions containing snow melting agent.
- b) Corrosion at plate edge and around welding area of drain holes expands, leading to the drain holes being clogged.
- c) The environment inside the hanger bracket becomes rapidly worse, starting with corrosion of the inner surface, which will lead to perforation.

(3) Cause of the Defect

Hanger bracket is exposed to salty and humid environments for a long period of time under road conditions containing snow melting agent. Under these circumstances, corrosion will develop on hanger bracket and the condition will become worse, by simultaneous corrosion and clogging of the drain hole area, which will lead to a progression of erosion and thickness reduction of hanger bracket from inside.

(4) Consequence

If the vehicle is driven after the front lower control arm deforms due to rust, the front lower control arm can break, resulting in loss of control of the vehicle and a possible collision.

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

- February 3, 2011: FHI received a Quality Monitoring Report (QMR) of front lower control arm corrosion occurred in U.S.A. from Subaru of America, Inc.
- February 27, 2011 through March 16, 2011: Investigations of claimed and randomly sampled vehicles were conducted in the U.S.A. and Canada.
- April 7, 2011: FHI received the PE Opening Resume and the associated VOQs
- April 22, 2011: FHI received a PE with due date of June 13 from NHTSA.
- May 8, 2011 through May 14, 2011: FHI engineers conducted investigations of environmental conditions in which complained vehicles were used.
- June 3, 2011: FHI submitted part of PE response to NHTSA with a request of extension of response submission of the remaining inquiries.
- July 13, 2011: Final response of PE was submitted to NHTSA.
- July, 2011 through August, 2011: FHI investigated salt belt region environment (scattering amount of snow melting agent by country) in Europe.
- August 24, 2011: The investigation result was shared and discussed in General Manager Meeting at FHI.
- August 30, 2011: 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

(i) The remedy plan calls for dealers to inspect corrosion degree of the front lower control arms. Dealers will either rust proof or replace both sides of the front lower control arms with new ones.

(ii) Subaru of America, Inc. expects to notify U.S. Subaru dealers around September 7, 2011. Saab Cars North America provided advance recall notification to U.S. Saab dealers on September 23, 2011, which included a number to their dealer business center to answer questions, as necessary. Subaru will start preparing modified parts. It is expected that owner notification from Subaru of America, Inc. to owner's of Subaru vehicles will begin early- to mid- November 2011. It is expected that owner notification from Saab Cars North America to owner's of Saab vehicles will begin within 60 days. Subaru will update NHTSA if the situation changes significantly.

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: WVX-34.

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.