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By Recall Management Division at 3:07 pm, Sep 09, 2011



SUBARU

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

c/o Subaru of America
Subaru Plaza
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856-488-8500
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September 9, 2011
Ref. No.: GR11-050

11V-467
(4 Pages)

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 – Moonroof Glass Coming-off on 2011 Subaru Legacy & Outback 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 Moonroof Glass on certain 2011 model year Subaru Legacy and Outback vehicles sold in the United States. Our internal designation for this recall campaign will be: WWV-33.

Note: The enclosed updates our previous response dated September 6, 2011 (Ref. No. GR11-047).

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

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): | 2011 |
| Model(s): | Legacy and Outback Vehicles |
| Production Dates: | August 3, 2010 through July 1, 2011 |
| VIN Ranges: | 2011 Legacy: B2215420 through B3259708 |
| (Last 8 Digits) | 2011 Outback: B3327519 through B1435565 |

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

| Year | Model | Number of Vehicles Potentially Involved |
|------|---------|---|
| 2011 | Legacy | 17,092 |
| 2011 | Outback | 52,498 |
| | Total | 69,590 |

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 1 technical report of the problem from Subaru of America, Inc.

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

(1) Evaluation result of returned parts

Moonroof glass comes loose or off. Adhesion area between glass and retainer is small.

- a) Width of primer application was found less than the amount specified in the design drawing in certain areas.
- b) Amount and positions of seal (adhesive) application was inappropriate at both of outer and inner circumferences of certain areas.



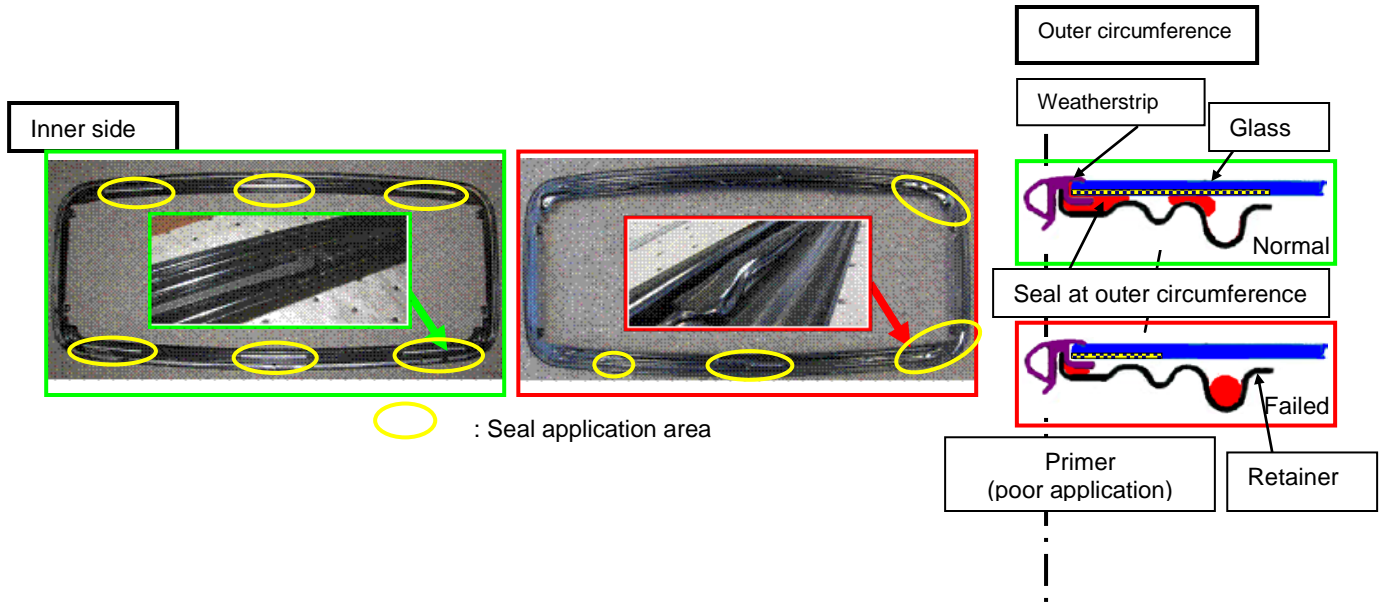
(2) Cause of the Defect

Assembly process of glass and retainer was changed at supplier from another vendor during summer shut-down in 2010. Application management of primer and seal was inappropriate.

- a) Specification (40 +/- 10mm) of primer application width was not specified in work procedure.
- b) Poor management of seal application amount.

(3) Consequence

The moonroof glass can loosen and detach from the vehicle during driving, resulting in a potential road hazard for other vehicles that may lead to a collision.



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

- June 20, 2011: FHI received a technical report of moonroof glass coming off together with a returned part from Subaru of America, Inc.
- June, 2011 through July, 2011: Poor adhesion of moonroof glass was confirmed during investigations of returned parts in SIA and supplier.
- July, 2011 through August, 2011: FHI estimated the cause of the problem of glass coming off as poor management of seal application amount at supplier.
- August 27, 2011: The failure condition and cause of the problem was confirmed by 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 glass adhesion condition and dealers will either apply additional seal or replace the moonroof glass with a new one according to the inspection result.

(ii) Subaru of America, Inc. expects to notify U.S. dealers around September 7, 2011. Subaru will start preparing modified parts. It is expected that owner notification 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: WWV-33.

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.