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(4 pages)



**SUBARU**

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

c/o Subaru of America  
Subaru Plaza  
PO Box 6000  
Cherry Hill, NJ 08034-6000  
856-488-8500  
856-488-8669 fax

March 4, 2013  
Ref. No.: GR13-017

Ms. Nancy Lummen Lewis  
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 2012 Subaru Legacy & Outback Vehicles**

Dear Ms. Lewis,

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 2012 model year Subaru Legacy and Outback vehicles sold in the United States. Our internal designation for this recall campaign is: WVW-33.

**Note:** The purpose of this report is to notify NHTSA that 14 new vehicles (**ALL** 2012MY Subaru Legacy/Outback) have been added to a previous NHTSA Recall Campaign announced in September 2011 (NHTSA Campaign Number: 11V-467) which involved certain 2011MY Legacy/Outback vehicles.

If you have any questions on the enclosed report, please contact me at (443) 430-3619 or [jfro@subaru.com](mailto: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.

## 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): 2012  
Model(s): Legacy and Outback Vehicles  
Production Dates: Certain vehicles manufactured from April 6, 2011 through May 12, 2011  
VINs: Please refer to the following table:

Year	Model	Affected VINs
2012	Legacy	C3002002, C3002006, C3002008, C3002010, C2002011, C2002012, C3002013, C1002014, C3002015
2012	Outback	C2200005, C3200006, C2200008, C3200009, C3200012

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

Year	Model	Number of Vehicles Potentially Involved
2012	Legacy	9
2012	Outback	5
	<b>Total</b>	<b>14</b>

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

It is not possible to determine an estimated percentage.

### 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.



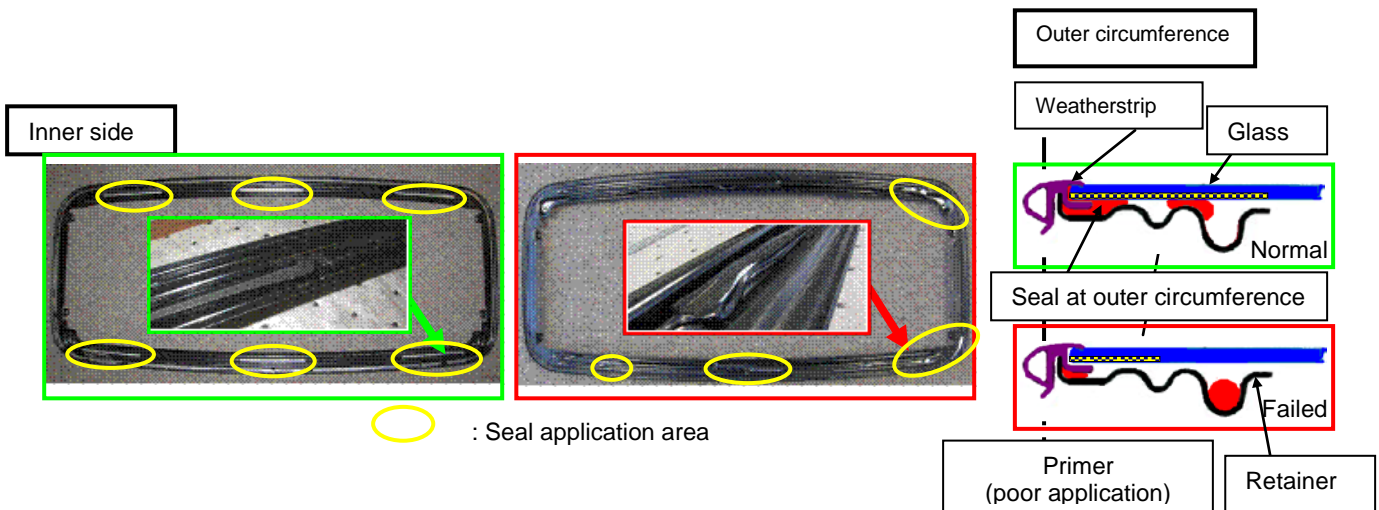
#### (2) Cause of the Defect

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**

- September 6, 2011: Subaru submitted a DIR of the WVW-33 recall (Moonroof Glass) on certain 2011MY Legacy and Outback vehicles to NHTSA.
- February 15, 2013: A problem related to a separate recall (i.e. WVV-32 - Wiper Motor) was reported on a 2012MY vehicle driven by an SOA employee via QMR (Quality Monitoring Report).
- February 18, 2013: FHI's investigation revealed that the Wiper Motor of the reported vehicle had not been remedied as it should have per WVV-32. It was also discovered that this same vehicle should have been remedied per the WVW-33 (Moonroof Glass) recall.
- February 27, 2013: FHI's further investigation estimated that the WVW-33 (Moonroof Glass) recall may possibly have not been performed on certain 2012MY pre-production Legacy and Outback vehicles.
- March 4, 2013: Subaru submitted a new DIR to NHTSA to include these potentially affected 2012MY pre-production Legacy and Outback vehicles.

### **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. notified customers on February 22, 2013. Remedy parts are available now for all of the affected units. There is no need to notify dealers since the cars have already been sold.

### **573.6(c)(10) - Submission of Recall Communications**

Fuji Heavy Industries USA, Inc. previously provided copies of all notices, bulletins and other recall related communications.

### **573.6(c)(11) - Manufacturer's Campaign Number**

Our identification code for this recall campaign is: WVV-32.

### **577.5(a) - Submission of Owner Notification Letter**

A copy of the owner notification letter was submitted to NHTSA's Recall Management Division on September 19, 2011 and approved on September 20, 2011.