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By Recall Management Division at 7:35 am, Mar 27, 2013

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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 26, 2013  
Ref. No.: GR13-022

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 – Brake Line Corrosion in Salt Belt States on 2005-2009MY  
Subaru Legacy and 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 of the brake lines on certain 2005-2009 model year Subaru Legacy and Outback vehicles sold in the United States. Our internal designation for this recall campaign is: WQG-43.

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):** 2005-2009

**Model(s):** Legacy and Outback vehicles that are currently or have ever been registered in the twenty (20) salt belt States (CT, DE, IA, IL, IN, MA, MD, ME, MI, MN, MO, NH, NJ, NY, OH, PA, RI, VT, WI, and WV) plus D.C.

**Production Dates:**

Model Year	Model	Production Dates	
		Start-of-Production	End-of-Production
2005	Legacy	December 2003	May 2005
2006	Legacy	May 2005	June 2006
2007	Legacy	June 2006	March 2007
2008	Legacy	March 2007	April 2008
2009	Legacy	April 2008	April 2009
2005	Outback	December 2003	May 2005
2006	Outback	May 2005	June 2006
2007	Outback	June 2006	March 2007
2008	Outback	March 2007	April 2008
2009	Outback	April 2008	April 2009

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

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.

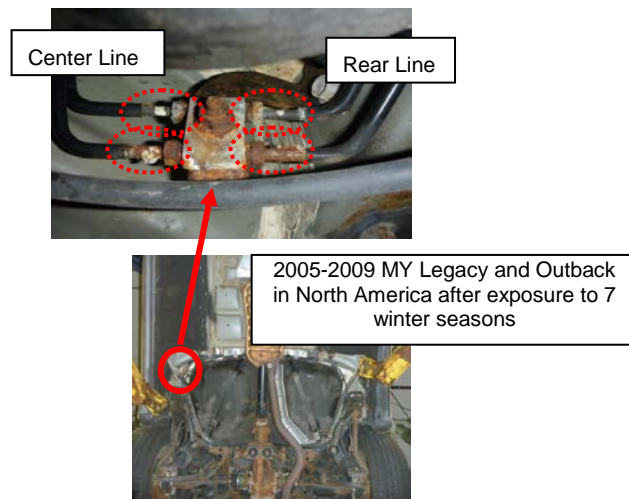
### 573.6(c)(4) - Percentage of Vehicles Estimated to Actually Contain the Defect

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 and treatment will be performed on the affected vehicles.

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

#### (1) Evaluation result of returned parts

Brake lines collected from twelve (12) 2005-2009MY Legacy and Outback vehicles sold in the North American market showed corrosion. Subaru’s investigation determined that these vehicles brake lines could perforate after exposure to 7 or more winter seasons. The perforation could occur at the brake line four-way joint connector, where the center and rear lines are joined and where there is no resin cover installed.



#### (2) Cause of the Defect

Depending on driving conditions, salt water could splash on the brake lines through a gap in the fuel tank protector, resulting in excessive corrosion of the brake lines. Due to the shape of the fuel tank protector used exclusively on 2005-2009MY Legacy and Outback vehicles, the amount of water which could contact the affected area is significantly more than other Subaru Models/Model Years when driven over 30 kph and passing over puddles 40 mm or more deep.

#### (3) Consequence

Brake fluid may leak from the perforated line(s). Since the center and rear brake lines work independently of one another, braking will still be possible if either (but not both) systems fail. The driver will be alerted to a fault in the brake system via illumination of the brake system warning telltale lamp because the fluid level will drop in the system. Failure of either the center or rear brake lines might cause the driver to misjudge the amount of brake pedal travel required to achieve the desired stopping distance.

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

May 2011: During recent rust investigations in 2011 in salt belt areas, it was found that the brake line corrosion had progressed beyond FHI's expectation on 2005-2009MY Legacy and Outback vehicles.

August 2011-March 2012: The brake lines were collected to more thoroughly evaluate the brake line corrosion progression.

March 2012-March 2013: FHI performed the following evaluation tests (1) water exposure to the affected vehicles in real-world driving conditions and (2) salt water spray tests on static brake lines.

March 14, 2013: FHI organized further internal discussion of the brake line corrosion issue.

March 19, 2013: FHI finished the investigation and concluded that Subaru conduct a safety recall in the U.S. market.

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

The remedy plan calls for dealers to inspect and determine the presence of brake fluid seepage around the brake line four-way joint connector. This is accomplished by depressing the brake pedal firmly during engine idle.

- **Scenario No. 1:** If no brake fluid seepage is observed, the affected area will be rustproofed with anti-corrosion wax.
- **Scenario No. 2:** If brake fluid seepage is observed, the original center and rear brake lines will be replaced with new ones followed by rustproofing with anti-corrosion wax.

#### **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 is: WQG-43

#### **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.