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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

April 24, 2013
Ref. No.: GR13-027

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 – Carpeted Floor Mats Curling on 2014MY Subaru Forester 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. (SOA) and Fuji Heavy Industries, Ltd. (FHI), submits the enclosed notification and report concerning a defect of the carpeted floor mats on certain 2014 model year Subaru Forester vehicles sold in the United States. Our internal designation for this recall campaign is: WQH-44.

If you have any questions on the enclosed report, please contact me at (443) 430-3619 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.

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): 2014
Model(s): Forester vehicles
Production Dates: Certain vehicles manufactured from January 2013 through March 2013.

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

Approximately 10,137 vehicles are estimated to potentially contain the defect.

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

Although the percentage of affected vehicles likely to actually experience the failure is unknown, replacement of each car's four (4) carpeted floor mats will be performed on all of the potentially affected vehicles.

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

The resin composition used for the floor mat backing was not manufactured to specification. This can cause the floor mats to curl when exposed to heat. Curling of the floor mat could distract the driver and/or interfere with proper operation of one or a combination of the vehicle's clutch, brake, and accelerator pedals. The driver might not be able to operate the vehicle as desired, possibly resulting in a crash.

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

April 1, 2013: Vancouver, WA Port identified twenty-one (21) 2014MY Forester carpeted floor mats with "curling."

April 2, 2013: Alerted supplier and requested an investigation. In addition, alerted all other port locations to inspect for similar condition.

April 10, 2013: Supplier reported that on a sampling of five carpeted floor mats, one exhibited "curling."

April 11, 2013: SOA issued an initial field report to FHI.

April 12, 2013: SOA held a meeting to discuss the floor mat issue. At the conclusion of this meeting, all 2014MY Forester carpeted floor mat inventory was placed on hold and a determination was made to cease installation of 2014MY Forester carpeted floor mats at all port locations.

April 15, 2013: A determination was made to inform dealers to remove all carpeted floor mats from 2014MY Forester vehicles in inventory.

April 16, 2013: SOA shipped actual failed carpeted floor mats to FHI for further investigation.

April 19, 2013: SOA held a meeting with the supplier and audited their factory, but did not obtain sufficient information. FHI received actual failed carpeted floor mats and studied how it might influence real world driving.

April 24, 2013: FHI has not finished the investigation but could not wait for further information; thus, FHI concluded that it must conduct a safety recall in the U.S. market.

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

- (i) The remedy plan calls for dealers to replace each of the vehicle's four (4) carpeted floor mats with new ones.
- (ii) Subaru of America, Inc. expects to notify U.S. dealers on or around April 24, 2013. It is expected that owner notification will begin within 5 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 is: WQH-44

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.