

Subaru Takata Recall Completion Accounting: Non-responsive Owners

In accordance with the December 22, 2020 emailed instructions from NHTSA to affected OEMs, Subaru is requesting permission to account for in reporting to NHTSA the number of Subaru vehicles affected by the Takata air bag inflator recalls whose owners have not responded to outreach, and permission to reduce the outreach cadence to those owners due to their non-responsiveness.

The Agency's instructions are repeated below, followed by Subaru's responses.

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**If you believe it is appropriate to account for affected vehicles where the current owners affirmatively refuse the remedy or do not respond to outreach, please submit to NHTSA your approach for doing so, which must include:**

- a. **An explanation of the outreach such current owners will have received. This includes volume, cadence, and type, and any associated data in support.**

As of August 2024, Subaru has an overall Takata recall completion rate of 93.8% (accounting for scrapped, export, stolen, and the Amended Coordinated Remedy Order (ACRO) 'other' category (SESO) vehicles), with 146,675 in-transit (non-SESO) vehicles remaining with an open Takata recall.

As reported to NHTSA in the quarterly ACRO Paragraph 37 submissions, Subaru has continued to outreach to the owners of each of the in-transit vehicles at least once per month, in accordance with the ACRO and previous NHTSA/Takata Monitor recommendations, through various forms of outreach methods including direct mail, email, license plate scanning/tagging, canvassing, state DMV letter notifications, dealer DMS messaging, and other activities aimed at driving engagement for the Takata recall.

Subaru has continued its relationship with the third-party performance marketing company that had previously provided outreach management services for the Settlement Special Administrator of the Multi-District Litigation class action settlement. As reported in the Q2 2024 ACRO Paragraph 37 submission, listed below is a summary of that activity since the beginning of Subaru's direct relationship with that company in August 2022, through May 2024. In addition to this outreach, Subaru has continued to engage its own direct mail outreach plan to all in-transit vehicles owners. All outreach materials clearly state the safety risks associated with the Takata recall, and are reviewed and approved by NHTSA (or, previously, the Takata Monitor) prior to deployment of those materials.

| Metric         | Counts    |
|----------------|-----------|
| Mail           | 4,164,972 |
| Email          | 3,200,934 |
| Outbound Phone | 991,389   |
| Tagging        | 8,894     |
| Total Outreach | 8,366,250 |

**b. An explanation of how you will confirm that the current owners will have received the outreach that was sent, including an explanation of the specific data sources that were used.**

The third party performance marketing company mentioned in section (a.) above continuously updates owner contact information for its ongoing outreach activities. That data will be leveraged to identify non-responsive owners based on the following criteria:

- The affected vehicle must be at least five years old from its production date, and that vehicle is not reported as scrapped, exported, stolen, or 'other' (SESO)
- The S&P Global (Polk) owner data has been refreshed monthly
- The affected vehicle has had the same currently identified owner for at least 20 months
- Historical outreach records show that the currently identified owner has been sent at least 20 pieces of mail to the S&P Global (Polk)-supplied address

**c. An explanation of how much outreach will continue to the current owners, including volume, cadence, and type, and why that level of outreach is reasonable. While this may be less than monthly, outreach should not cease entirely.**

Non-responsive owners will continue to receive one postcard per year, through the third-party performance marketing company mentioned in section (a.) above, unless ownership changes. This once-per-year contact will serve the purpose of reminding the owner that the recall is still open on the vehicle and that Subaru is ready to provide the free remedy when they are ready to present the vehicle. Additional outreach attempts are unlikely to result in a remedy, given that at least 20 pieces of mail have already been sent to the currently identified owners.

Ownership changes for non-responsive owners will be monitored on a quarterly basis, through data obtained from S&P Global (Polk). If an ownership change is identified, the new owner will be introduced into the normal outreach program for the Takata recalls, unless the vehicle can be otherwise accounted for in the scrapped, exported, stolen, or 'other' (SESO) categories.

**d. A description of the types of situations involving affirmative refusals (if applicable) for which you would account, including a description of supporting documentation or photographic evidence you intend to gather in support.**

Not applicable: Subaru is not requesting permission to account for affirmative refusals at this time.

**e. The number of vehicles for which you would intend to account as of the date of your submission, if any (report non-responsive and affirmative-refusal counts separately).**

Subaru intends to account for approximately 46,457 vehicles in the non-responsive category, starting with the January 10, 2025 submission to NHTSA. The actual count will be verified prior to each submission of the non-responsive category in the monthly Takata Dashboard

'Completion Overview' report, to ensure that the values reported are current as of that submission.

As of January 1, 2025, the non-responsive (NR) counts by recall are as follows:

| Subaru recall ID | NHTSA ID | 1/2/2025 NR VIN count |
|------------------|----------|-----------------------|
| WQP51            | 14V763   | 39                    |
| WQR53            | 15V323   | 3247                  |
| TKA16            | 16V358   | 3897                  |
| TKB16            | 16V359   | 3259                  |
| TKC16            | 16V361   | 1095                  |
| TKA17            | 17V014   | 368                   |
| TKB17            | 17V026   | 1084                  |
| TKC17            | 17V016   | 1193                  |
| TKA18            | 18V012   | 623                   |
| TKB18            | 18V013   | 1417                  |
| TKC18            | 18V014   | 1156                  |
| TKA19            | 19V007   | 581                   |
| TKB19            | 19V008   | 6248                  |
| TKC19            | 19V009   | 7553                  |
| TKA20            | 20V001   | 6420                  |
| TKB20            | 20V002   | 4667                  |
| TKC20            | 20V003   | 3610                  |
|                  |          | 46457                 |

- f. **An explanation of how VINs accounted for in this manner will be monitored for an ownership change (which should occur at least quarterly). As with other categories, change in ownership must re-disposition the vehicle into the unrepaired population (unless the vehicle can be accounted for in another category).**

As mentioned above in section (c.), ownership changes of these vehicles will be monitored on a quarterly basis using vehicle registration data from S&P Global (Polk). If an ownership change is identified, the new owner will be introduced into the normal outreach program for the Takata recalls, unless the vehicle can be otherwise accounted for in the scrapped, exported, stolen, or 'other' (SESO) categories.

All Subaru VINs with an open Takata recall, regardless of whether they are reported in the SESO and non-responsive categories, will appear with that open recall in any VIN search conducted on Subaru's website, NHTSA's VIN lookup tool, or through any partnerships in which Subaru's open recall information is used.

- g. **An affirmation that all underlying records will be documented and subject to audit by NHTSA.**

Subaru affirms that all underlying records will be documented and subject to audit by NHTSA.

**h. Any additional information in support of your proposed approach to accounting.**

Subaru believes that the information in this submission, together with the more detailed information in the relevant sections of its quarterly ACRO Paragraph 37 submissions and monthly Takata Dashboard Reports, is complete. Subaru can provide additional information or explanation to the Agency, if requested.