

Part 573 Safety Recall Report

22V-624

Manufacturer Name : Subaru of America, Inc.

Submission Date : AUG 12, 2022

NHTSA Recall No. : 22V-624

Manufacturer Recall No. : WRG-22



Manufacturer Information :

Population :

Manufacturer Name : Subaru of America, Inc.

Number of potentially involved : 188,397

Address : One Subaru Drive

Estimated percentage with defect : 100 %

Camden NJ 08103

Company phone : 844-373-6614

Vehicle Information :

Vehicle 1 : 2017-2019 Subaru Impreza

Vehicle Type : LIGHT VEHICLES

Body Style : 4-DOOR

Power Train : GAS

Descriptive Information : -Description of the issue: The left front and right front halogen headlamp assemblies, containing the side reflex reflector and low beam reflector, may not fully meet requirements set forth in FMVSS No. 108 – Lamps, Reflective Devices, and Associated Equipment.

-The basis for how the recall population was determined: Potentially affected vehicles were identified using left front side reflex reflector component test data and vehicle production records. The potentially affected vehicle populations for the right front side reflex reflector and left front low beam reflector are smaller, and completely included subsets of the total population. The right front low beam reflector is not affected. The headlamp assembly contains both the side reflex reflector and the low beam reflector components.

-How the recalled products differ from products that were not included in the recall: Vehicles equipped with a halogen headlamp assembly with a side reflex reflector and low beam reflector that are manufactured after the countermeasure implementation and verification date are not affected. Vehicles equipped with LED headlamps are not affected.

The recall population includes certain 2017 - 2019 model year Impreza 4-DOOR vehicles. The number of potentially affected Impreza 4-DOOR vehicles is 63,696.

Production Dates : OCT 19, 2016 - JUL 24, 2019

VIN Range 1 : Begin :

NR

End : NR

Not sequential

Vehicle 2 : 2017-2019 Subaru Impreza

Vehicle Type : LIGHT VEHICLES

Body Style : STATIONWAGON

Power Train : GAS

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-How the recalled products differ from products that were not included in the recall: Vehicles equipped with a halogen headlamp assembly with a side reflex reflector and low beam reflector that are manufactured after the countermeasure implementation and verification date are not affected. Vehicles equipped with LED headlamps are not affected.

The recall population includes certain 2017 - 2019 model year Impreza STATIONWAGON vehicles. The number of potentially affected Impreza STATIONWAGON vehicles is 124,701.

Production Dates : SEP 06, 2016 - JUL 25, 2019

VIN Range 1 : Begin :

NR

End : NR

Not sequential

Description of Noncompliance :

Description of the Noncompliance : The left front and right front halogen headlamp assemblies, containing the side reflex reflector and low beam reflector, may not fully meet requirements set forth in FMVSS No. 108 – Lamps, Reflective Devices, and Associated Equipment.

FMVSS 1 : 108 - Lamps, reflective devices, and assoc. Equipment

FMVSS 2 : NR

Description of the Safety Risk : At certain viewing angles, the left front and right front side reflex reflectors may not properly provide reflected light, which may lower the vehicle visibility to other road users, increasing the risk of a crash. Additionally, the left front halogen low beam reflector may not properly illuminate the roadway for the driver and/or may cause glare for other road users, increasing the risk of a crash.

Description of the Cause : During the manufacturing process, a side reflex reflector part was caught in the

mold resulting in damage to the mold. Some side reflex reflectors produced after mold damage may have diminished reflective performance. At a later date, the mold used in production of the halogen low beam headlamp reflector was worn to a point where production parts may no longer meet certain data point performance requirements.

Identification of Any Warning that can Occur : None

Involved Components :

Component Name 1 : LAMP ASSY HEAD

Component Description : Lamp Assy Head LH

Component Part Number : 84001FL01A

Component Name 2 : LAMP ASSY HEAD

Component Description : Lamp Assy Head RH

Component Part Number : 84001FL00A

Supplier Identification :

Component Manufacturer

Name : Valeo Lighting System North America, LLC

Address : 1231 A Avenue

Seymour Indiana 47274

Country : United States

Chronology :

July 18, 2019 – Subaru was informed by NHTSA that testing indicated a noncompliance for the left front halogen headlamp assembly.

July 24, 2019 – A mold insert of the side reflex reflector was replaced as a preliminary countermeasure. In addition, the inspection frequency for the side reflex reflector and the halogen low beam reflector was increased from once-per-month to once-per-week.

July 25 - September 25, 2019 – From the result of the continued investigation, it was determined that a

damaged mold used for the side reflex reflector and a worn mold for the halogen low beam reflector had caused a change in product performance. Subaru traced the potentially affected halogen headlamp assemblies to a vehicle manufacturing period of September 23, 2016 through August 7, 2019.

September 26, 2019 – Subaru decided that certain vehicles may not comply with the requirements set forth in FMVSS No. 108

October 23, 2019 - Based on information provided by the supplier, Subaru decided to file a Petition of Decision of Inconsequential Noncompliance for relief from notification and remedy requirements under the Motor Vehicle Safety Act.

August 5, 2022 – Subaru received notice that NHTSA had denied Subaru's petition.

August 8, 2022 - Subaru reviewed NHTSA's denial and decided to recall the subject vehicles.

Description of Remedy :

Description of Remedy Program : For all affected vehicles, Subaru dealers will replace the left-hand and right-hand front headlamp assemblies with remedied parts at no cost to the customer.

Subaru will provide reimbursement to owners for repairs according to the general plan submitted in May 2022.

How Remedy Component Differs from Recalled Component : The remedy components meet FMVSS 108 requirements and the remedy parts are currently produced under a new part number.

Identify How/When Recall Condition was Corrected in Production : At the supplier, the mold insert for the LF and RF side reflex reflectors was replaced on July 24, 2019.

The inspection frequency for the side reflex reflector and the halogen low beam reflector was increased from once-per-month to once-per-week on July 24, 2019.

Remedied parts were implemented on the vehicle production line on July 30, 2019.

Recall Schedule :

Description of Recall Schedule : Owner notification will occur within 60 days. If remedy parts are not available, an interim owner notification letter will be mailed to customers. Dealer notification is scheduled to begin on or about August 16, 2022.

Planned Dealer Notification Date : AUG 16, 2022 - AUG 16, 2022

Planned Owner Notification Date : OCT 11, 2022 - OCT 11, 2022

* NR - Not Reported