

- ATTENTION:**
- GENERAL MANAGER
 - PARTS MANAGER
 - CLAIMS PERSONNEL
 - SERVICE MANAGER

IMPORTANT - All Service Personnel Should Read and Initial in the boxes provided, right.

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QUALITY DRIVEN® SERVICE

SERVICE INFORMATION BULLETIN

APPLICABILITY: All 2022MY and Later Models Equipped with STARLINK Telematics **NUMBER:** 15-284-21
DATE: 07/12/21
SUBJECT: STARLINK Telematics Service Availability in Massachusetts **REVISED:** 10/28/24

INTRODUCTION / BACKGROUND:

In November 2020, voters in Massachusetts (MA) passed an amendment to the existing MA motor vehicle “Right to Repair” law. Among other things, this new amendment (the Data Law) requires automotive manufacturers that utilize a Telematics system to equip their vehicles with an interoperable, standardized, and open access platform for communicating certain vehicle data to third parties. These new requirements apply to all model year 2022 and newer vehicles.

As a direct result of the new Data Law, Subaru of America is no longer able to offer STARLINK Safety & Security services to MA residents starting with MY2022 vehicles. Specifically, any MY2022 and newer Subaru vehicle having a MA address associated with either the vehicle or the STARLINK account will not be able to subscribe to STARLINK Safety & Security services. This includes any of the following associations: Owner, Co-owner, Driver, Co-Driver, Subscriber, Authorized User, Business, or Fleet Management Company. Subaru retailers will be unable to enroll these vehicles during the delivery process, and customers will be unable to enroll themselves, whether they use MySubaru or by calling STARLINK Customer Care.

IMPORTANT NOTE: Model years prior to 2022 are not affected by this change. Additionally, vehicles with WiFi hotspot capability will still be able to access AT&T 4G data services should customers wish to pursue a subscription directly with AT&T.

BULLETIN PURPOSE:

This Service Information Bulletin has been prepared to inform retailer employees and Technicians of the impact of the Massachusetts Data Law. This bulletin also provides insights to reference when responding to customer inquiries and addressing Telematics-related repairs as part of these new business requirements.

<p>CAUTION: VEHICLE SERVICING PERFORMED BY UNTRAINED PERSONS COULD RESULT IN SERIOUS INJURY TO THOSE PERSONS OR TO OTHERS.</p> <p>Subaru Service Bulletins are intended for use by professional technicians ONLY. They are written to inform those technicians of conditions that may occur in some vehicles, or to provide information that could assist in the proper servicing of the vehicle. Properly trained technicians have the equipment, tools, safety instructions, and know-how to do the job correctly and safely. If a condition is described, DO NOT assume that this Service Bulletin applies to your vehicle, or that your vehicle will have that condition.</p>	<p style="text-align: center;">Subaru of America, Inc. is ISO 14001 Compliant</p> <p>ISO 14001 is the international standard for excellence in Environmental Management Systems. Please recycle or dispose of automotive products in a manner that is friendly to our environment and in accordance with all local, state and federal laws and regulations.</p>
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All customer inquiries regarding the Data Law or eligibility to enroll in STARLINK must be referred to Subaru's Customer Advocacy Department (CAD) or the STARLINK Call Center. CAD and the STARLINK Call Center have received training on how to respond to these inquiries.

Retailers should check to confirm the name and address found in Vehicle Inquiry match the information on the Repair Order (RO). If the address on the RO is not located in MA, the retailer should either update the customer record or, direct the customer to update the address in MySubaru. Contact CAD for further assistance.

STARLINK SERVICES AND MYSUBARU:

STARLINK subscriptions and services will remain available on all vehicles prior to MY2022 and on all MY2022 and later vehicles which are not associated with a MA address. Additionally, MySubaru access will remain available for all model years and all customers, including MY2022 vehicles associated with a MA address to allow customers to access preferred retailer information, maintenance service scheduling, and reminders.

IMPORTANCE OF DCM COMMUNICATION CHECKS IN MA:

Ensuring optimal telematics and SXM360 is vital for confirming functionality.

Cause of Concern:

Despite the limitations imposed by MA law on telematics enrollment, the DCM (Data Communications Module) plays a crucial role in enabling various vehicle features, including SiriusXM's SXM360 service. Due to the increasing complexity of modern vehicles and the availability of MA-compliant telematics options, technicians may have become complacent about performing thorough communication checks on DCMs. This oversight can lead to undiagnosed DCM issues, customer dissatisfaction, and unnecessary repairs.

Corrective Action Required:

1. Mandatory Communication Checks:

- **NVI/PDI:** Ensure that all DCMs undergo comm checks during New Vehicle Inspection (NVI) or Pre-Delivery Inspection (PDI).
- **After DCM Replacement:** Perform comm checks on DCMs immediately after they are replaced to verify proper functionality.

2. Understand DCM's Role:

- **Beyond Telematics:** Recognize that the DCM is not solely for telematics. It facilitates a range of vehicle features, including SXM360, which requires a functioning DCM for operation.
- **MA Law:** While MA law limits telematics enrollment, it does not restrict the use of the DCM for other essential functions.

3. Address Undiagnosed Issues:

- **Thorough Diagnosis:** If a customer experiences issues with SXM360 or other features related to the DCM, conduct a thorough diagnosis to identify the root cause.
- **Avoid Unnecessary Repairs:** By performing proper communication checks, technicians can prevent unnecessary replacements of CCUs or DCMs.

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IMPORTANT NOTE TO RETAILERS:

Due to the interdependency between the DCM, infotainment system, and other vehicle systems via CAN communication, there may be repair situations which will require replacement or additional diagnosis of Telematics system components even in the absence of an active STARLINK subscription. In order to be eligible for warranty claim reimbursement, Telematics system repairs on vehicles restricted by the new Data Law must be accompanied by clear documentation of the customer's concern, detailed Technician notes with findings including specific DVOM readings when applicable and all steps taken to verify and repair the customer's concern. A lack of documentation for Telematics system repairs on vehicles restricted by the new Data Law may result in claim review, audit proceedings, or claim denial.

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A copy of SOA's Official Communication to Customers is supplied below:



STARLINK Safety & Security Massachusetts (MA) Telematics Data Law - FAQs

What is the MA Telematics Data Law?

In November 2020, voters in Massachusetts passed an amendment to the existing MA motor vehicle "Right to Repair" law. Among other things, this new amendment (the Data Law) requires automotive manufacturers that utilize a telematics system to equip their vehicles with an inter-operable, standardized, and open access platform for communicating certain vehicle data to third parties. These new requirements apply to all model year 2022 (MY2022) and newer vehicles.

What does this mean for Subaru customers?

As a direct result of the new Data Law, Subaru of America is no longer able to offer STARLINK Safety & Security services to MA residents starting with MY2022 vehicles. Specifically, any MY2022 and newer Subaru vehicle that has a MA address associated with either the vehicle or the STARLINK account will not be able to subscribe to STARLINK Safety & Security. This includes any of the following addresses: Owner, Co-owner, Driver, Co-Driver, Subscriber, Authorized User, Business, or Fleet Management Company. Subaru retailers will be unable to enroll these vehicles during the delivery process, and customers will be unable to enroll themselves, whether they use MySubaru or call STARLINK Customer Care (Admin Portal).

When will the MA Telematics Data Law go into effect?

The Data Law is in effect now, and it applies to all MY2022 and newer vehicles. The first MY2022 Subaru vehicles will be on sale in approximately June 2021.

Which Subaru models are affected by the MA Telematics Data Law?

The Data Law affects all MY2022 and newer vehicles associated with a Massachusetts address. This includes the following addresses: Owner, Co-Owner, Driver, Co-Driver, Authorized User, Business, or Fleet Management Company.

How can I tell if a vehicle is affected?

Subarunet

In Subarunet, Vehicle Inquiry, under "Telematics Subscription," you will see the following message for all affected vehicles:

Telematics Subscription				
WIFI Subscription	Not Enrolled	Commchecked	Not Available	DCM Version Number
To comply with the Massachusetts Telematics Data Law, this VIN is ineligible for telematics services. Click here for details				
Product Start Date	Product End Date	Status	Product Name	Subscriber Name

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Retailers going through the Delivery Process will not have the option for STARLINK enrollment after creating the customer's MySubaru account.

Are Certified Pre-Owned (CPO) vehicles affected?

The new Data Law applies to all MY2022 and newer vehicles, regardless of whether they are new, used, or CPO vehicles.

Are models prior to 2022 model year affected?

No. The new Data Law applies only to MY2022 and newer vehicles. Any model year prior to 2022 remains eligible to enroll in STARLINK Safety & Security regardless of the addresses associated with the vehicle.

What happens if a customer is enrolled in STARLINK and moves to MA?

If an Owner, Co-owner, Driver, Co-driver, Subscriber, Authorized User, Business, or Fleet Management Company associated with a MY2022 or newer vehicle moves to MA, then the Subscriber will receive an email notifying them that their subscription will be automatically cancelled in 30 days. The Subscriber will receive a pro-rated refund (if applicable) and will not be able to re-enroll.

What happens if a customer moves out of MA?

If the MA address previously associated with the vehicle is updated to an address outside of MA, and no other address associated with the vehicle is in MA, then the vehicle will be eligible to enroll in STARLINK services. The customer will be able to proceed with enrollment in MySubaru or by calling STARLINK Customer Care.

What happens if the vehicle owner resides outside of MA, but another vehicle relationship is in MA?

If anyone associated with the vehicle resides in MA, then the vehicle will not be eligible to enroll in STARLINK services. This includes the Owner, Co-owner, Driver, Co-driver, Subscriber, Authorized User, Business, or Fleet Management Company.

IMPORTANT REMINDERS:

- SOA strongly discourages the printing and/or local storage of service information as previously released information and electronic publications may be updated at any time.
- Always check for any open recalls or campaigns anytime a vehicle is in for servicing.
- Always refer to STIS for the latest service information before performing any repairs.