

- 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

PRODUCT CAMPAIGN BULLETIN

APPLICABILITY: 2020MY Legacy & Outback **NUMBER:** WUL-97R
SUBJECT: Brake Pedal Bracket Mounting Bolt Inspection **DATE:** 09/11/19
REVISED: 09/27/19
NHTSA ID: 19V664

Subaru of America, Inc. (Subaru) is recalling certain 2020 model year Legacy and Outback vehicles in which the brake pedal mounting bracket may have an insufficiently tightened or missing bolt. A total of 3,450 U.S. vehicles will be affected by this recall. The repair will involve an inspection of the suspect bolts in all potentially affected vehicles and replacement of the brake pedal assembly only if determined to be necessary.

AFFECTED VEHICLES:

Model Year	Carline	Production Date Range	Affected VIN Range
2020	Legacy	July 31, 2019 – August 26, 2019	L3002088 – L3002961
2020	Outback	July 30, 2019 – August 29, 2019	L3100178 – L3107324

Not all vehicles in the production range listed above are affected by this recall. Coverage must be confirmed by using the Vehicle Coverage Inquiry function on subarunet.com prior to repair. This information is now available.

REASON FOR THIS RECALL:

The brake pedal mounting bracket hardware in potentially affected vehicles may have an insufficiently tightened or missing bolt. Over time, if this condition exists, the brake pedal mounting area may deform. Deformation of the brake pedal mounting area could reduce braking performance, increasing the risk of a crash.

DESCRIPTION OF THE REMEDY:

Subaru will inspect the brake pedal mounting bracket hardware. If it is determined that hardware was improperly installed, Subaru will replace the hardware or brake pedal assembly.

<p>CAUTION: VEHICLE SERVICING PERFORMED BY UNTRAINED PERSONS COULD RESULT IN SERIOUS INJURY TO THOSE PERSONS OR TO OTHERS.</p>	<p>Subaru of America, Inc. is ISO 14001 Compliant</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>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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OWNER NOTIFICATION:

Subaru will notify all potentially affected vehicle owners by first class mail on or around October 1, 2019. Owners with a valid email address on file with Subaru will also be notified by email.

RETAILER RESPONSIBILITY:

Please be advised that it is a violation of Federal law for a dealer to deliver a new motor vehicle covered by a recall under a sale or lease until the defect is remedied. Therefore, any Authorized Subaru Retailer failing to perform the applicable service procedures to correct all affected vehicles in their inventory prior to the vehicle being placed in service may be subject to civil penalties of up to \$21,000 per violation (i.e., for each vehicle), as provided in 49 CFR §578.6 and will also be in breach of the Subaru Dealer Agreement.

Any vehicles listed in any recall/campaign that are in retailer stock must be:

- Immediately identified.
- Tagged or otherwise marked to prevent their delivery or use prior to repair.
- Repaired in accordance with the repair procedures outlined in the Product Campaign Bulletin

Retailers are to promptly follow the applicable service procedures, to correct all affected vehicles in their inventory (used, demo & SSLP). Additionally, whenever a vehicle subject to this recall is taken into retailer inventory necessary steps should be taken to ensure the recall correction has been made before selling or releasing the vehicle.

INTRODUCTION:

This bulletin provides a procedure for inspection of two brake pedal assembly mounting bolts. If inspection results dictate, replacement of the brake pedal assembly will be required. Based on a significant number of inspections conducted to date, the number of vehicles requiring brake pedal assembly is anticipated to be EXTREMELY small.

PART INFORMATION:

Order Only When Needed- Rare Case

Description	Part Number
Pedal Assembly-Brake SIN	36012AN02A
Pedal Assembly-Brake SIS	36012AN03A
Additional Part Required for Repair	
Duct Foot DSIA	72127AN00A

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SERVICE PROCEDURE / INFORMATION:

Inspection Tool Requirements:

- Inch-pound torque wrench
- 12” extension
- #40 Torx® bit

Additional Tools for Repair (when applicable):

- Inch-pound and foot pound torque wrenches
- 10mm socket and ratchet
- Plastic trim removal tools
- Philips screw driver
- 12mm deep socket
- 12mm open-end wrench

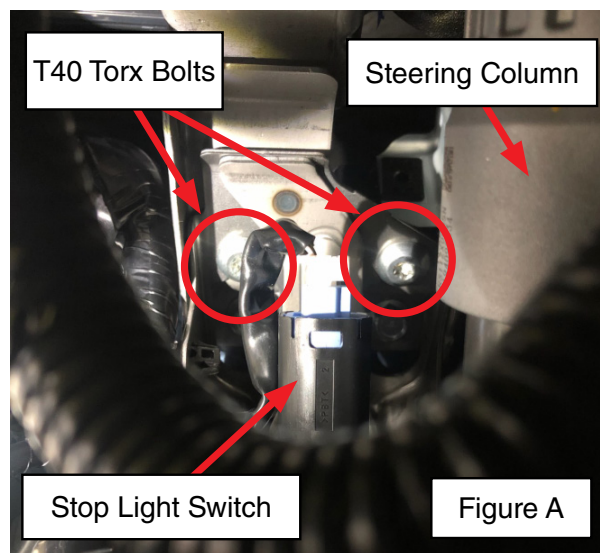
REMINDER: Customer satisfaction and retention starts with performing quality repairs.

Initial Hardware and Bolt Torque Inspection:

- **CAREFULLY** disengage the 3 retaining clips by hand and remove the lower dash under-cover.



IMPORTANT NOTE: The picture (**Figure A**) below shows the mounting bolt area of the brake pedal assembly with the lower dash under-cover removed. When performing this initial inspection, **only** the bottom cover shown above needs to be removed.



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Inspection Procedure:

There are 2 bolts used to secure the front (closest to the driver) portion of the brake pedal assembly to the mounting bracket. The T-40 Torx bolts are secured with a 12 mm flanged hex nut.

- Assemble the torque wrench, necessary extension(s) and the T40 Torx bit. If the torque wrench is digital, Set it to 5 Nm (3.7 ft. lbs. or 44.3 inch-pounds).
- Confirm both T40 Torx bolts are present as shown in **Figure A** above.
- Check the bolt torque while paying close attention for any movement (using a clockwise/ tightening motion) of the bolt prior to the specified value being reached. **NOTE:** The plastic foot ventilation duct can be easily moved backward enough to gain sufficient access to check the bolt torque

IMPORTANT NOTE:

Use caution to not move the duct any more than necessary. If it becomes loose, it must be replaced as it is a **one-time use** part.



Inspection / Test Results:

- If **BOTH** bolts are present and hold the torque **WITHOUT TURNING** when checking, the vehicle is **OK**. Reinstall the lower dash under cover panel and proceed to the Claim Reimbursement and Entry Procedures section.
- If **EITHER** of the bolts are missing **OR** turn **AT ALL** when checking the torque, this is a **NG** test result and will be **EXTREMELY RARE**. Proceed with replacing the brake pedal assembly following the procedure in the applicable Service Manual.

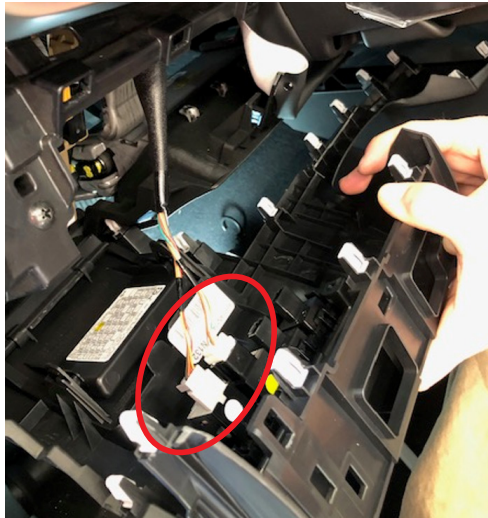
IMPORTANT: The photos and helpful hints supplied below are to supplement the Service Manual procedures and help Technicians improve their efficiency when replacing the brake pedal assembly is required. Again, this will be an **EXTREMELY RARE** occurrence.

- After noting the customer's audio system presets and favorites, disconnect the negative (-) ground cable from the battery sensor and wait at least 60 seconds before proceeding.
- **CAREFULLY** remove the instrument panel (IP) end cover and upper trim using a plastic trim tool. Remove the two (2) Phillips screws securing the lower trim.



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- **CAREFULLY** unsnap the trim, disconnect the switch harness connectors and set the panel aside.



- **CAREFULLY** release the fabric lower column cover trim from the top edge of the knee airbag module. There are 2 retaining clips (one on each end) and 2 alignment tabs in the middle.



- Remove the 2- 10mm hex nuts securing the knee airbag module and set it aside on end as shown. **NOTE:** There is no need to disconnect the airbag harness connector from the module.



- **IMPORTANT:** When brake pedal assembly replacement is determined to be necessary, the plastic foot duct (p.n. 72127AN00A) must be removed for access and replaced as it is a **one-time use** part. Once removed, the duct's retaining clips will lose some of their strength and not properly secure the duct if reinstalled.

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- Adjust the steering column tilt to a neutral position (between full high and full low) and fully extend the telescoping feature. Be sure to lock the tilt / telescope lever before proceeding.
- Proceed with removing the steering column assembly to gain access to the brake pedal assembly mounting hardware. The brake pedal assembly is secured with 2- 12mm Hex (vertical) bolts holding it to the dash bar and 4- 12mm hex nuts surrounding where the master cylinder operating rod passes through the toe board.

HELPFUL TIPS:

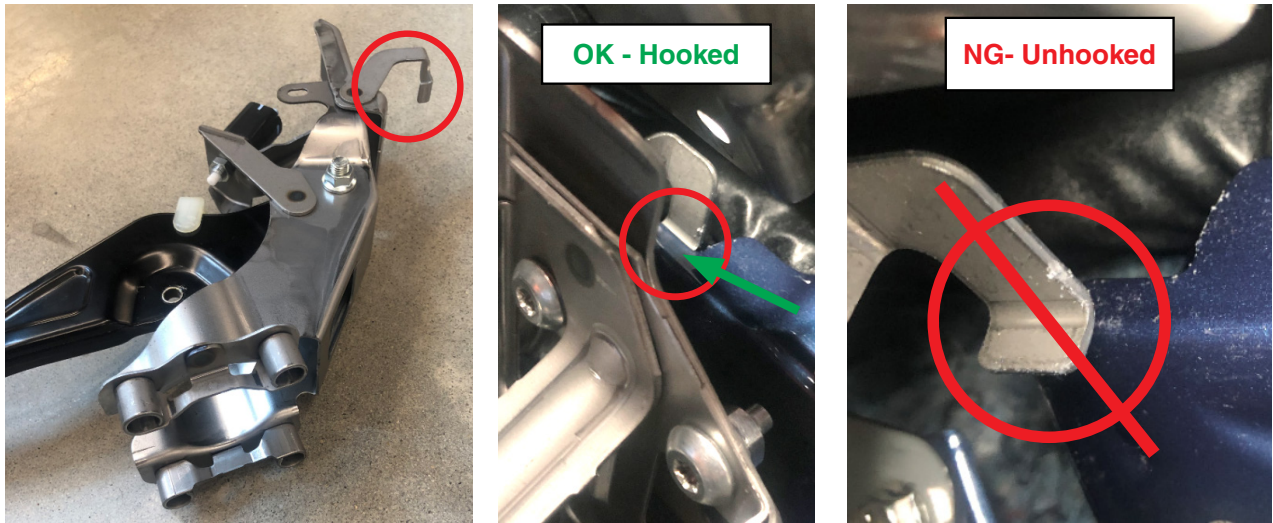
1. When **CAREFULLY** removing the upper and lower column trim covers, push the 2 blue retaining clips for the fabric trim out from inside the upper cover to release them instead of using a trim stick to pry them loose. Leave the trim attached to the combination meter.
2. Before removing the top bolt from the universal joint shaft, use the seat belt to hold the steering wheel in position and keep it from turning.
3. Put reference marks on both the column bracket and corresponding mounting surface as well as between the upper universal joint on the steering shaft and column shaft splines. When these marks align at reinstallation, the steering column shaft will be in the proper position and should also be fully seated back into the steering shaft shaft universal joint.



4. Use a piece of wide Painter's Tape or equivalent (tape which will not leave any residue) to keep the steering wheel from turning (and the roll connector in proper position) while the column assembly is removed.

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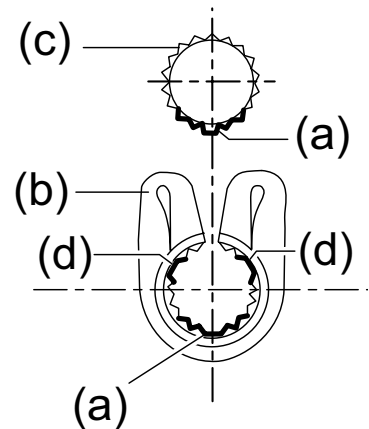
5. When installing the new brake pedal assembly, there is a tab portion which must be “hooked” onto a body-colored bracket to help hold it in place during assembly. The photo sequence below shows the tab portion and **OK** and **NG** photos for comparison to help confirm proper installation.



6. It is **STRONGLY** recommended to use a helper when reinstalling the steering column to assist with alignment of the column shaft splines into the upper universal joint of the steering shaft.

ADDITIONAL CAUTIONS / TIPS:

- Torque for 12mm hex nuts and bolts for brake pedal assembly installation 18 Nm (13.3 ft. lbs.)
- Torque for 10mm hex nuts for knee airbag 7.5 Nm (5.5 ft. lbs.)
- Always align the protrusion (a) of the column shaft (c) with the corresponding cutout (a) of the universal joint spline. If another cutout (d) is used for alignment, the bolt of the universal joint assembly steering cannot be assembled.
- Ensure there is a **MINIMUM** of 15 mm clearance between the universal joint and any surrounding pipes, hoses, harnesses or other potential points of contact.
- When tightening the mounting bolt on the steering shaft upper universal joint, torque it to 24 Nm (17.7 ft. lbs.).
- Always place the tilt lever in the lock position after adjusting the steering column.
- When complete, reassemble the remainder of the under-dash components in reverse order of disassembly.
- Reconnect the negative (-) battery cable and torque the retaining nut to 7.5 Nm (5.5 ft. lbs.).
- Reset the customer’s audio system presets and favorites.
- Proceed to the Claim Reimbursement and Entry Procedures section to complete the procedure.



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CLAIM REIMBURSEMENT AND ENTRY PROCEDURES:

Credit to perform this recall will be based on properly completed repair order information. Retailers may submit claims through Subarunet.com.

Labor Description	Labor Operation #	Fail Code	Labor Time
INSPECTION	A154-318	WUL-97	0.2hrs
INSPECTION AND PEDAL ASSEMBLY REPLACEMENT	A154-311		1.2hrs

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.

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OWNER NOTIFICATION LETTER

URGENT
IMPORTANT SAFETY RECALL
This notice applies to the VIN below



Subaru of America, Inc
PO Box 9103
Camden, NJ 08101-9877
844-373-6614
www.subaru.com

Subaru Safety Recall WUL-97
NHTSA Recall ID 19V-664
October 2019

Dear Subaru Owner:

This notice is sent to you in accordance with the National Traffic and Motor Vehicle Safety Act.

SUBARU OF AMERICA, INC. has decided that a defect, which relates to motor vehicle safety, exists in certain 2020 model year Legacy and Outback vehicles.

You received this notice because our records indicate that you currently own one of these vehicles.

REASON FOR THIS SAFETY RECALL

The brake pedal mounting bracket hardware in your vehicle may have an insufficiently tightened or missing bolt. Over time, if this condition exists, the brake pedal mounting area may deform. Deformation of the brake pedal mounting area could reduce braking performance, increasing the risk of a crash.

WHAT SUBARU WILL DO

Subaru will inspect the brake pedal mounting bracket hardware in your vehicle at no cost to you. If it is determined that hardware was improperly installed, Subaru will replace the hardware or brake pedal assembly at no cost to you.

What You Should Do

You should contact any authorized Subaru retailer (dealer) for an appointment to have this safety recall repair performed, at no cost to you.

HOW LONG WILL THE REPAIR TAKE?

The time required for the inspection of the brake pedal mounting bracket hardware is approximately 15 minutes. However, your retailer can provide you with a better estimate of the overall time for this service visit, as it may be necessary to make your vehicle available for a longer period of time. If it is determined that the hardware was improperly installed, your retailer will order the parts that need to be replaced. Upon receipt of the necessary parts, the time required to complete the repair is approximately one hour.

For your convenience, your retailer will provide you with a loaner or rental vehicle, at no cost to you, until the repair is complete.

OWNER INFORMATION

Government regulations require that recall notifications be sent to the last known owner of record. That information is based primarily on state registration and title data. If you are a lessor of this vehicle, federal regulations require you to forward this notice to your lessee within ten days.

If you have moved or sold your vehicle, please update this information online at www.subaru.com, select 'Customer Support,' then select 'Address Update' or 'Ownership Update' from the "Quick Links" menu.

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IF YOU NEED FURTHER ASSISTANCE:

To locate the nearest Subaru retailer, you can access our website at www.subaru.com and select 'Find a Retailer.'

If you need additional assistance, please contact us directly:

- By e-mail: Go to www.subaru.com and select "Customer Support"
- By telephone: 1-844-373-6614
Monday through Friday between 8:00 a.m. and 7:00 p.m. ET
- By U.S. Postal mail: Write us at Subaru of America, Inc.
Attn: Customer-Retailer Services Department
P.O. Box 9103, Camden, NJ 08101-9877

To subscribe to the NHTSA Recall Notification email System, please go to: <https://www-odi.nhtsa.dot.gov/nhtsa/subscriptions>.

Please contact us immediately if the Subaru retailer fails or is unable to make the necessary repairs free of charge.

You may also contact the Administrator, National Highway Traffic Safety Administration (NHTSA), 1200 New Jersey Ave., SE, Washington, DC 20590 or call the toll-free Vehicle Safety Hotline at 1-888-327-4236 (TTY: 1-800-424-9153) or go to <http://www.safercar.gov> if you believe the Subaru retailer has failed or is unable to remedy your vehicle without charge within a reasonable amount of time.

Your continued satisfaction with your Subaru is important to us. Please understand that we have taken this action in the interest of your safety and your vehicle's proper operation. We sincerely apologize for any inconvenience this matter may cause and urge you to schedule an appointment as soon as possible.

Sincerely,
Subaru of America, Inc.

Notice to Lessors: Under Federal law the lessor of a vehicle who receives this letter must provide a copy of it to the vehicle lessee(s) within 10 business days from receipt. The lessor must also keep a record of the lessee(s) to whom this letter is sent, the date sent, and the applicable vehicle identification number (VIN). (For the purposes of this section, a lessor means a person or entity that in the last twelve months prior to the date of this notification has been the owner, as referenced on the vehicle's title, of any five or more leased vehicles. A leased vehicle is a vehicle leased to another person for a term of at least four months.)

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