

Subarunet Announcement

To: All Subaru Retailers

From: Subaru of America, Inc.

Date: January 7, 2021

COVID-19 Service Department Guide

Due to the continued impacts of the COVID-19 outbreak, SOA is pleased to announce an extension of the Service Department COVID policy adjustments that were announced in November. The round trip towing component will be extended through January, ending on January 31, 2021. The recall mobile repair and use of the SSLP vehicles to complete recall and customer pay repair components of the Service Program will run through the end of February, ending on Feb 28, 2021.

Following pages include a summary of the claim submission procedures for round trip towing, the use of the SSLP and CPO vehicles under the program, and the list of recalls that can be completed as a mobile repair under the Service Program.

Completing Recalls on In-Stock and SSLP Units

Retailers remain responsible for ensuring all new and used in-stock vehicles with open safety recall/campaigns are repaired and free of defects prior to delivery to a customer. This is an excellent time to ensure all in-stock and SSLP vehicles are up to date with any necessary recall work. Retailers can submit claims for in-stock units with mileage of 750 or less. SSLP Units are already registered and have a Warranty Start Date so are not restricted by the 750-mile limitation.

1. Round trip towing to complete open safety recall repairs

Round trip towing or third-party towing: SOA will cover towing to the closest authorized Subaru retailer, for recalls that need to be completed in a retailer service shop. *This is intended to allow for the completion of recalls that cannot be completed under the offsite repair policy – if the recall can be completed offsite, that option should be utilized in this scenario.* Examples of offsite repairs that retailers may choose to make under Section 10.5 of the Claims Policies and Procedures Manual include (but are not limited to) WTW-82, WTZ-85, WUA-86, and WUE-90. Retailers may pick up and return vehicles to customers or use a third-party towing company.

In this scenario, the retailer would submit the recall claim with the cost of towing in the towing field. Upon claim submission, retailers must include comments noting that this was a round trip tow to complete open safety recalls and should include distance to retailer. Please refer to section 8.4.41 in the Claims Policies and Procedures Manual for additional towing documentation requirements.

2. Expanded recall mobile repairs

For Retailers conducting mobile recall repairs, SOA is expanding the number of recalls eligible for remote repair from 4 to 26. This expansion will last until January 4, 2021, after which recalls eligible for mobile repair will return to being noted in the applicable Recall Bulletin. Refer to the full list and procedures at end of this announcement. Existing offsite repair policies still apply – refer to section 10.5 of the Claims Policies and Procedures Manual for important requirements regarding these offsite repairs. **As stated in the manual, retailers remain responsible for complying with all applicable laws and regulations, and for ensuring adequate insurance coverage for this work.**

Retailers may utilize a CPO vehicle for Technicians to drive to a customer's home to complete the recall repair onsite. SOA will allow a \$50 reimbursement of one CPO per day, per technician, when completing multiple recall mobile repairs.

For CPO reimbursement, the retailer would submit a policy adjustment claim using the CPO VIN used onsite recall repairs. The CPO vehicle will be reimbursed at \$50 per day, once per day. Fuel is not included.

CPO Recall Mobile Repairs Reimbursement

Repair order document: Repair order should be opened for the CPO VIN for the day in use. Service Manager, Service Director or their designee must sign repair order in lieu of a customer signature. Record VINs repaired while using the CPO vehicle.

Claim Notes/Comments: Must include in the claim comments the RO/Job/VIN/Repair for each customer repair completed that day.

Other: Enter \$50 in rental field, and \$50 in the "SOA Amount" field. Use "CPO" as Customer Last name and use retailer zip code in Customer Zip Code field.

Warranty / Claim Information for CPO Recall Mobile Repair Reimbursement

Claim Type	Labor Description	Labor Operation #	Labor Time	Fail Code
PA	Rental Only	A101-102	0.0	RNT-00

4. Use of SSLP vehicles to complete recall & customer pay repairs

These temporary solutions are intended to help retailer service departments remain open while continuing to provide customers a means to have safety recalls repaired and maintenance services completed.

Following are scenarios where you can utilize SSLP vehicles to serve your customers:

Scenario 1: Recall Pick up & Delivery. Retailer would bring the SSLP vehicle to the customer and drive the customer's vehicle back to the service department to perform the open recall repairs. The retailer would submit a claim for the recall and claim \$50 for use of the SSLP vehicle. SOA will allow reimbursement of one SSLP per day, per technician, when completing multiple repairs. *Note: Requires SSLP loaner/rental agreement signed by the customer. E signatures are permissible at the discretion of the retailer as noted in the March 23, 2020 announcement: "SSLP Program Changes in Response to COVID-19".*

Scenario 2: Customer Pay Pick up & Delivery. Retailer would bring SSLP vehicle to the customer and drive the customer's vehicle back to the service department to perform customer pay maintenance service, i.e. 30, 60, 90k or any service repair requiring 2 hours or more. *Note: Requires SSLP loaner/rental agreement signed by the customer. E signatures are permissible at the discretion of the retailer as noted in the March 23, 2020 announcement: "SSLP Program Changes in Response to COVID-19".*

For customer pay reimbursement, the retailer would submit a policy adjustment claim using the SSLP VIN used to make pick-up and delivery repairs. The customer pay pick-up and delivery SSLP vehicle will be reimbursed at \$25 per day, once per day. Fuel is not included.

SSLP Customer Pay Reimbursement

Repair order document: Repair order should be opened for the SSLP VIN for the day in use. Service Manager, Service Director or their designee must sign repair order in lieu of a customer signature. Record VINs repaired while using the SSLP vehicle.

Claim Notes/Comments: Must include in the claim comments the RO/Job/VIN/Repair for each customer repair completed that day.

Other: Enter \$25 in rental field, and \$25 in the "SOA Amount" field. Use "SSLP" as Customer Last name and use retailer zip code in Customer Zip Code field.

Warranty / Claim Information for SSLP Customer Pay Reimbursement

Claim Type	Labor Description	Labor Operation #	Labor Time	Fail Code
PA	Rental Only	A101-102	0.0	RNT-00

Please be aware of the following SSLP Administration Requirements under this Program:

- An SSLP Service loaner contract must be opened in WebDrive for both above scenarios to maintain SOA provided SSLP insurance coverage.
- Customers must sign SSLP loaner contract for any SSLP vehicles left in their possession.
- Each Service loaner contract opened and closed will count towards overall SSLP retailer incentive utilization and individual vin utilization.
- The retailer must utilize Subaru SSLP vehicles; rental units from outside rental companies (ie: Enterprise, Hertz, etc.) are not eligible for the \$25 per day reimbursement.
- Each SSLP vehicle is eligible for one \$25 reimbursement per day for customer paid work.

To support these temporary SSLP uses, SOA recently adjusted the incidental use policy and rental contract/agreement:

> SSLP Certificate of Coverage (called "SSLP Physical Damage," located under "Documentation" in the Arrowhead Portal)

(2) Incidental Use: Damage occurring while: (a) refueling the Vehicle; (b) servicing the Vehicle; (c) delivering the Vehicle to an off-site customer location; (d) using the Vehicle for purposes necessary to service a customer's vehicle while the community is under "social distancing" or "shelter at home" advisories. However, these incidental uses will only be covered if they occur during your regular business hours and the employee driving the vehicle is an eligible driver under your garage insurance policy.

> March 23, 2020 Subaru of America Risk Management announcement:

Re: *SSLP Program Changes in Response to COVID-19*

In an effort to assist with challenges presented by the Coronavirus emergency the following changes are in effect:

Update to 30 Day Limitation on SSLP / Rental Contracts - Return of SSLP/Rental Unit for Inspection:

Due to insurance requirements, the SSLP program currently mandates that loaner/rental contracts cannot be written for more than 30 days and requires the customer to return the rental vehicle to the retailer's facility for inspection before a contract can be written for any additional rental periods requested.

Effective immediately and at the discretion of the retailer, the requirement to return the rental vehicle to the retailer's facility is waived as long as the customer has signed and returned a new SSLP or Rental contract (prior to the expiration of the 30 day period) for the additional rental periods required beyond the initial 30 days. Please be sure to close the expiring agreement in the SSLP system when a new agreement is created.

Please note: All contracts must continue to be written for 30 days or less to avoid liability insurance exclusions prohibiting retail automobile leases."

Electronically Submitted Documents and Signatures

Electronically submitted documents including those with digital signatures, signature replications and or photos of signatures may be legally binding in your state or jurisdiction and could include contracts returned via email, fax or other means such as a smart phone photo. Please consult legal counsel if you have any questions concerning the legality of specific forms of e-contracts.

Should you have any questions please contact Matia Marks, mmarks@subaru.com or Drew McGillin, dmcg@subaru.com

List of Offsite Recall Repairs Allowed

Existing offsite repair policies still apply – refer to section 10.5 of the Claims Policies and Procedures Manual. As vehicles may have been sitting for an extended time, always confirm the charge level of the vehicle battery before attempting module programming. The vehicle battery must have sufficient charge to start and operate. SOA recommends for any programming related recalls that a spare, stand alone and fully charged battery be attached in parallel to the vehicle battery via jumper cables to maintain current and avoid possible ECM damage. Do not use a jump box for programming. Do not connect to the battery of a running vehicle as ripple voltage from the running vehicle could cause a concern. Always confirm there are no diagnostic trouble codes (DTC) present in the module(s) being updated prior to starting any programming.

This expanded list is for the duration of the program (November 23, 2020- January 4, 2021), after which recalls eligible for mobile repair will return to being noted in the applicable Recall Bulletin.

As stated in the Claims Policies and Procedures Manual, retailers remain responsible for complying with all applicable laws and regulations, and for ensuring adequate insurance coverage for this work. Retailers also remain solely responsible for ensuring the safety of retailer personnel, the public, and the vehicle at all times. Strict safety precautions must be followed when performing mobile repairs. Under no circumstances should a technician be raising a vehicle or accessing the underside. The parking brake must be set during the repair in all instances and wheel chocks must be used if the work area is on an incline. If significant unforeseen circumstances arise that cannot be easily corrected, the vehicle must be returned to the retailer. If the circumstance raises drivability or safety concerns, the vehicle must be towed to the retailer for further repair.

Campaign	Description
WQS54	2015 Impreza, XV, Legacy, Outback EyeSight Reprogramming
WQT55	2012 Impreza ODS Occupant Control Unit
WQY60	2006-2014 Tribeca - Hood Latch - Final Repair
WQZ61	2016 Forester, Impreza, Legacy & Outback - Telematics DCM reprogramming
WTB63	2015 Legacy/Outback Electronic Parking Brake (EPB) Reprogramming (NOTE: WITHOUT Current Failure)
WTG67	2015 Legacy/Outback, Relay Replacement (Service Campaign)
WTH68	2015-2016 Legacy/Outback, Relay Replacement (Service Campaign)
WTK71	2010-2014 Legacy/Outback Front Wiper Motor Bottom Cover
WTN74	2017 Impreza Rearview Image
WTP75	2017 Impreza Rough Idle, No Start, Stalling
WTQ76	2015MY WRX and STI Subwoofer Overheating
WTR77	2018MY Crosstrek Incorrect Floor Mat Retention Bracket
WTS78	2018 Forester Black Edition FMVSS 110 - Incorrect Certification Label
WTT79	Impreza/Crosstrek - Low Speed Eng. Stall (Service Program)
WTW82	2018 Legacy/Outback Distance to Empty (DTE)
WTZ85	Harman B/U Rear Display
WUA86	Harman Software Update (Service Program)
WUD89	2017 Legacy/Outback Distance to Empty-DTE (Service Program)

WUE90	Brake Lamp Switch
WUF91	Replacement Ignition Switch
WUG92	Crosstrek Rear Door Glass
WUH93	2019 Leg/OB Duct Weld
WUM98	Forester ODS
WUQ02	Impreza/Crosstrek Ignition Coil Reprogramming
WUU06	ECU Reprogramming C1424 (Service Program)
WRA20/ WRC20	Rear Seat Belt Webbing Lock (Recall) – NEW
WRG20	Continental Tire Recall (NOTE: <u>Inspection only</u>. If a faulty tire found, tire replacement must be performed at retailer)
WRH20	CP1 Reprogramming or Replacement for FOTA Update Failure (NOTE: Please keep engine running while performing reprogram)
WRI20	CP1 Software Upgrade (NOTE: Please keep the engine running when performing reprogram)
WRJ20	2019 Forester PRG Control Module Replace