

ATTENTION:

- GENERAL MANAGER
- PARTS MANAGER
- CLAIMS PERSONNEL
- SERVICE MANAGER

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



QUALITY DRIVEN® SERVICE

DEALER ADVISORY BULLETIN

SUBJECT: Counterfeit Air Bag Information

DATE: 10/25/12

OVERVIEW

The U.S. Department of Transportation’s National Highway Traffic Safety Administration (NHTSA) has issued a Consumer Safety Advisory to alert vehicle owners and repair professionals to the dangers of counterfeit air bags. NHTSA has become aware of a growing problem involving the sale and installation of counterfeit air bag module(s) used as replacement parts in vehicles which have been involved in a collision. While these air bag module(s) look nearly identical to original equipment parts, including bearing the automaker’s insignia, NHTSA testing has shown consistent malfunctioning which ranges from non-deployment of the air bag module(s) to the expulsion of metal shrapnel during deployment. To date, NHTSA is not aware of any deaths or injuries connected to counterfeit air bag module(s).

Current List of Subaru Vehicles Identified By NHTSA for Which Counterfeit Air Bag Modules Are Known to Exist

NOTE: As of today, NHTSA is aware that counterfeit air bag modules exist for the following Subaru models. This list is not comprehensive and is subject to change. It may be updated at any time as more Subaru model applicability is verified.

- 2008-2009 Legacy and Outback
- 2010-2011 Legacy and Outback
- 2008-2009 Impreza
- 2008-2009 Forester

KEY POINTS FROM THE NHTSA ANNOUNCEMENT

- If the customer purchased the vehicle new and none of the air bag module(s) were replaced, he / she is not at risk.
- If the customer purchased the vehicle new and the air bag module(s) were replaced by a franchised Subaru dealer with new Genuine Subaru replacement air bags, he/she is most likely not at risk. If the franchised Subaru dealer sublet the repair(s) to another facility (e.g. independent body shop or “specialist”), and the customer has a concern Genuine Subaru replacement air bag module(s) may not have been used, those repair(s) should be inspected by a dealer at the customer’s expense.

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<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>SUBARU OF AMERICA, INC. IS “ISO 14001 COMPLIANT”</p> <p>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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- If the customer had the air bag module(s) replaced at an independent repair facility and does not know if the replacement was furnished by a franchised Subaru dealer, he/she may be at risk.
 - If the repairs were paid for through insurance, the customer should ask their claims representative for verification stating a Genuine Subaru replacement air bag module(s) was installed as part of the repair claim. Also, the independent repair facility should be asked for written proof indicating the air bag module(s) is/are Genuine Subaru replacement part(s). If the insurer or independent repair facility cannot provide or verify replacement part documentation, the customer may be at risk.
 - There have been instances reported of independent body shops providing inaccurate documentation to insurance companies stating a genuine OEM air bag was installed when, in reality, a counterfeit part was used instead. Thus, the dealer cannot simply rely on the documentation the independent body shop provides for verification of a genuine OEM replacement air bag replacement. The only way to be certain is to perform an actual inspection of the suspect component(s).
 - If repairs were paid for by the customer, the customer should ask the independent repair facility for written proof indicating the air bag module(s) is/are Genuine Subaru replacement part(s). If the independent repair facility cannot provide or verify the replacement part documentation, the customer may be at risk. Again, the only way to be certain is to perform an actual inspection of the suspect component(s).
- Even if Genuine Subaru replacement part documentation is supplied, it will be up to the Customer to decide whether or not he/she wants either to have the vehicle inspected by a Subaru dealer to verify OEM compliance or accept the statement of the repair facility who installed the replacement air bag module(s).
- If the customer purchased the vehicle used and he/she does not know the vehicle's history, an on-line commercial service, (e.g. Carfax®, AutoCheck®) can be used to see if the vehicle was involved in a collision in which the air bag module(s) may have been deployed. **NOTE:** On-line commercial vehicle history reports are good indicators of a vehicle's history but may not provide all collision-related information.
- If the customer or his/her body shop bought the replacement air bag module(s) from an internet sales or online auction company or a salvage yard, the customer may be at risk.
- If the customer or his/her body shop paid significantly less for the replacement air bag module(s) than what Genuine Subaru air bag module(s) cost normally, the customer may be at risk.
- If the customer holds a salvage, rebuilt or reconstructed vehicle title to their car, they may be at risk.

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EXAMPLES OF GENUINE SUBARU AIR BAG MODULES

The following examples are being provided to illustrate general appearance characteristics of Genuine Subaru air bags. The photos supplied are not representative of all possible air bag combinations and should not be interpreted to represent the total family of air bags for each vehicle model.

DRIVER AIR BAG MODULE, 2008-2009 LEGACY AND OUTBACK



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DRIVER AIR BAG MODULE, 2010-2011 LEGACY AND OUTBACK



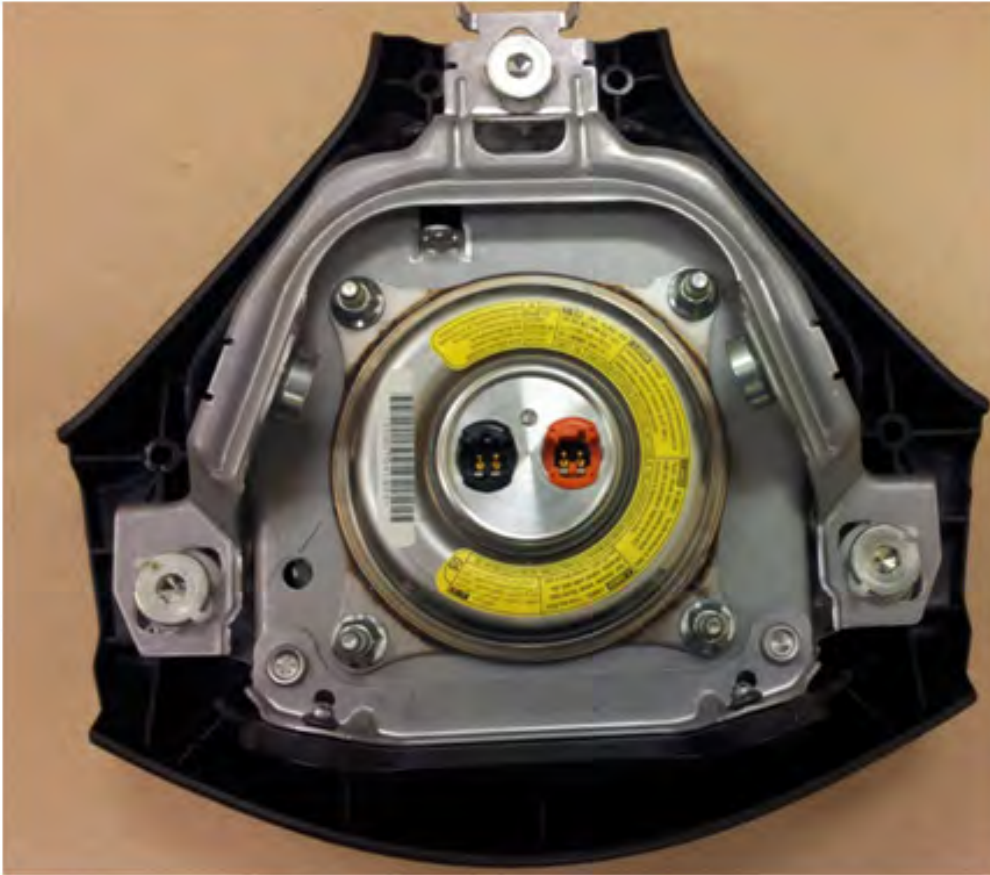
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DRIVER AIR BAG MODULE, 2008-2009 IMPREZA



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DRIVER AIR BAG MODULE, 2008 FORESTER



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DRIVER AIR BAG MODULE, 2009 FORESTER



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PASSENGER AIR BAG MODULE, 2008-2009 LEGACY AND OUTBACK



PASSENGER AIR BAG MODULE, 2010-2011 LEGACY AND OUTBACK



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PASSENGER AIR BAG MODULE, 2008-2009 IMPREZA



PASSENGER AIR BAG MODULE, 2008 FORESTER



SIDE AIR BAG MODULE, 2009 FORESTER



SIDE CURTAIN AIR BAG MODULE, 2009 FORESTER



SIDE CURTAIN AIR BAG MODULE, 2010 AND 2011 OUTBACK



KEY INDICATORS TO HELP IDENTIFY COUNTERFEIT AIR BAG MODULES

Counterfeit air bag modules can be very difficult to identify, especially when they are installed in the vehicle. However, some examples of visual clues which may indicate a counterfeit air bag module are:

When the air bag module is still installed in the vehicle:

- The texture of the vinyl material used for the counterfeit air bag module trim cover may be different from the Genuine Subaru OEM material.
- The color of the counterfeit air bag module trim cover may be slightly different from Genuine Subaru OEM or replacement parts.
- The vinyl trim cover may not have “tear seams” or slight depressions in the vinyl material that determine where the flap doors will open during deployment (typically an “H” pattern). The trim cover emblem is generally affixed to one flap of the trim cover door so it remains intact when the flaps open during deployment.
- The letters “SRS” (Supplemental Restraint System), or “AIRBAG” which are embossed or molded into the vinyl trim cover may not be well-defined.
- There may be evidence the counterfeit air bag module installer shaved or trimmed the vinyl trim cover for better fit into the steering wheel housing.
- The air bag warning light should illuminate at “key on” then go out after the vehicle is started.

When the air bag module is removed from the vehicle:

- The counterfeit air bag module labeling generally does not match Genuine Subaru OEM quality and quantity.
- There may be no serial number or if present, the same serial number may be repeated on different or multiple counterfeit air bag modules. Genuine Subaru serial numbers are unique to each air bag module.
- The inflator assembly may be labeled with a different vehicle manufacturer’s name than the air bag module’s emblem or intended fitment.
- The model number designation on the labeling may not match the Genuine Subaru OEM part number for that model vehicle.
- Barcode labels may be repeated on different or multiple counterfeit air bag modules.
- Tool or grinding marks may be visible on the fasteners and / or components of the air bag module.
- Rivets may appear to be tightened by a hand tool and not show a consistent ring pattern. Genuine Subaru rivets are machine-compressed and show a consistent ring pattern.
- The “warning” labeling normally found on a Genuine Subaru OEM air bag module may be missing.
- The colors or configuration of the inflator wire harness connectors may not match OEM colors or positions.
- Grounding terminals or “shorting bars” of the air bag module’s wire harness connectors which prevent deployment when disconnected from the vehicle system may be missing.
- The backing plate of the counterfeit air bag module harness may have numerous holes drilled into it so it can be installed into a wider range of vehicles.

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Another possibility is the counterfeit air bag module may have been rebuilt from a previously deployed air bag module. Look for signs indicating the metal parts may have been weakened by pyrotechnics, including burn marks or discoloration of the metals which may have been stretched or expanded by gases during a prior deployment. The previously deployed air bag itself may have been removed from the module assembly and only the steering wheel trim cover replaced. In addition, the supplemental restraint system fault detection system and / or warning lamp may have been bypassed or deactivated using resistors or diodes.

NOTE: NHTSA strongly advises technicians to NOT electrically probe counterfeit air bag module wiring harness connector terminals because of the risk of detonation and possible serious injury.

WHAT A DEALER NEEDS TO DO IF AN INSPECTION IS REQUESTED

When a Subaru dealership is requested to perform an air bag module inspection to determine authenticity, it will be necessary to remove the suspected module(s) and use the above indicators for initial evaluation. The Subaru Select Monitor III cannot be used to determine whether an air bag module(s) is genuine or counterfeit.

IMPORTANT: Any charges related to a vehicle inspection of suspected counterfeit air bag module(s) are not a matter for Warranty. Charges must be authorized in advance and upon completion, paid for by the customer before the vehicle is released. In addition, if the pre-authorized inspection reveals a counterfeit air bag(s) has been installed, charges to replace the counterfeit air bag(s) with Genuine Subaru parts are also not a matter for Warranty.

The dealership should validate the serial number on the air bag with SOA. Dealerships can call the phone number below with the VIN of the vehicle in question and air bag module serial number(s) needing verification. The dealership will receive a return contact with the requested information.

1-800-782-2783 (1-800- SUBARU-3)

SOA will only be able to tell the dealership if the serial number is what was originally installed into the vehicle at the time of manufacture or if it is consistent with the known ranges for that air bag module.

IMPORTANT: SOA cannot make the final determination if the air bag module(s) in question is a Genuine Subaru part. Final determination can only be made by the dealership personnel performing the inspection.

If the dealer finds a suspected counterfeit air bag module and the customer elects to not have it replaced, the dealer should have the customer sign a Customer Acknowledgement similar to the sample shown below before reinstalling the suspected counterfeit air bag module or releasing the vehicle. **Dealers are highly encouraged to check with their legal counsel to determine what the construction of their particular Customer Acknowledgement form should include as state and local laws in this area may vary. Other concerns involving the handling and disposition of counterfeit air bag modules should also be reviewed with the dealer's legal counsel to confirm compliance with applicable state and local ordinances. The sample below is provided as a guide and does not represent any official or unofficial legal advice from Subaru of America, Inc. It is up to each dealer to determine and follow all applicable legal requirements in this area.**

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SAMPLE CUSTOMER ACKNOWLEDGEMENT

The National Highway Traffic Safety Administration (NHTSA) has issued a Consumer Safety Advisory to alert vehicle owners and repair professionals to the dangers of counterfeit air bag modules. The NHTSA has also provided consumers with criteria and risk factors to help them evaluate whether or not their vehicles may be at risk.

 (XYZ Subaru) has completed an inspection of your vehicle's air bag module(s) in an attempt to determine if any may be counterfeit. Your vehicle was inspected consistent with published NHTSA dealer guidance and established air bag module inspection procedures provided by Subaru of America, Inc. We have determined from our inspection, one or more of your air bag module(s) appears to be counterfeit and hereby recommend the suspected counterfeit air bag module(s) be replaced with Genuine Subaru replacement air bags module(s).

You have elected not to replace the air bag module(s) in question at this time and have directed us to reinstall the suspected counterfeit air bag module(s) into your vehicle.

Before we reinstall the suspected counterfeit air bags please acknowledge the following:

1. Counterfeit air bag modules may not deploy or perform in the same manner as Genuine Subaru of America, Inc. - supplied replacement air bag modules.
2. Failure of counterfeit air bag modules to deploy or to perform in the same manner as Genuine Subaru of America, Inc. - supplied replacement air bag modules can lead to serious bodily injury or death to vehicle occupants.

The undersigned agrees and does hereby release from all liability and hold harmless XYZ Subaru Inc., Subaru of America, Inc. and any of their employees, suppliers or representatives. This liability release is for any and all liability for personal injuries including death, property loss or damage in connection with any consequences arising from or related to the continued use of the aforementioned suspected counterfeit air bag module(s) currently installed in this vehicle.

VIN# _____

Current Mileage: _____

I have read this document and understand it fully. I further understand by signing this release I have voluntarily surrendered certain legal rights.

Signature _____

Dated _____

Witness _____

Dated _____