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March 21, 2012

David Strickland
Administrator
National Highway Traffic Safety Administration
1200 New Jersey Avenue, SE, West Building
Washington, DC 20590

Dear Administrator Strickland:

I am writing to request that the agency investigate non-impact, driver-side, interior door fires in Subaru models. These fires are electrical in origin and appear to occur in the area of the window switches in 2001 – 2005 Legacy/Outback models.

According to NHTSA's consumer complaint database, there are reports of at least five incidents associated with driver-side interior door fires. However, this is clearly an underreporting of a problem that appears to be more widely known. Several owner forums address the door-fire defect. Typically a non-collision electrical fire claim of the type affecting these Subarus results in either repairs or a total loss that is covered by the insurance carrier. When consumer losses are paid, few of these incidents are likely reported by consumers to NHTSA.

Following a recent fire incident in Rowley, Massachusetts (reported to the agency as VOQ 10451496), the owner's mechanic met with a Liberty Mutual Insurance adjuster who indicated that he has seen at least four similar incidents and that Subaru repays insurers subrogation claims. The origins of the fires appear to be in the circuit associated with the heated driver's side exterior mirror. This is noted in several of the VOQs reported to NHTSA.

Currently we are unaware of any injuries or fatalities associated with door fires in these Subarus; however, as you know, NHTSA has historically considered these types of incidents safety-related defects that require remedy. Several manufacturers have recalled vehicles for electrical fires originating in the driver's door and currently the agency is investigating Toyota models for a similar issue. Furthermore, electrical fires emanating from the driver's door have been known problems to Subaru since at least 2008, thus we also request that the agency examine whether the company is in violation of the recall requirements of 49 CFR Part 573.

Sincerely,

Sean E. Kane