



**North American Subaru, Inc.**  
c/o Subaru of America  
Subaru Plaza  
PO Box 6000  
Cherry Hill, NJ 08034-6000  
856-488-8500  
856-488-8669 fax

July 30, 2017

[REDACTED]

Administrator, NOA-001  
National Highway Traffic Safety Administration  
1200 New Jersey Ave., West Building  
Washington, DC 20590

**RE: MY2017 Mid-Model Year Automotive Fuel Economy Report/Subaru**

Dear Administrator:

Pursuant to 49 CFR Part 537, North American Subaru, Inc. ("NASI"), on behalf of Subaru Corporation and Subaru of America, Inc., submits the following:

**537.5 (c)(1) 2017 Mid-Model Year Report–Passenger Automobiles & Light Trucks**

**(c)(2)** Subaru Corporation, Ltd.

**(c)(3)** Mr. David Barker, Energy and Environmental Activities Manager  
Government Relations  
North American Subaru, Inc.  
PO Box 6000  
Cherry Hill, NJ 08034-6000

**(c)(4)** Submitted by email to [cafe@nhtsa.gov](mailto:cafe@nhtsa.gov) with [REDACTED] business information (enclosed)

**(c)(5)** 2017 Model Year Passenger Cars (Import) and Light Truck Fleets

**(c)(7)** NASI considers portions of the enclosed to be "[REDACTED]," and has submitted a request to Chief Counsel's office, pursuant to Part 512. [REDACTED] treatment is being requested for the items contained in [brackets].

If there are any issues or questions regarding this submission, please do not hesitate to contact me at (989) 295-7917.

Sincerely,

A handwritten signature in blue ink, appearing to read "David Barker".

David Barker  
Energy and Environmental Activities Manager  
Government Relations

**Subaru Passenger Automobiles (Import and Domestic):** Pursuant to 49 CFR Part 537.7(a)(1), FUSA submits the following:

**49 CFR 537.7(b)(1) and 537.7(c)(2):**

Projected average fuel economy per 49 CFR 537.7(b)(1) and Combined fuel economy, projected sales, and total sales per 49 CFR 537.7(c)(2): **Subaru Passenger Automobiles (Import)**

| Model type code | Model Type                    | Combined Fuel Economy          | Projected Sales Volume By Model Type |
|-----------------|-------------------------------|--------------------------------|--------------------------------------|
| 1               | BRZ 2.0L 6MT                  | 31.9159                        | [5424]                               |
| 2               | BRZ 2.0L 6AT                  | 36.9200                        | [1536]                               |
| 3               | IMPREZA 4-Door 2.0L 5MT       | 35.7850                        | [1200]                               |
| 4               | IMPREZA 5-Door 2.0L 5MT       | 35.3520                        | [2400]                               |
| 29              | IMPREZA SPORT 4-Door 2.0L 5MT | 35.0701                        | [1200]                               |
| 27              | IMPREZA SPORT 5-Door 2.0L 5MT | 33.6471                        | [2400]                               |
| 5               | IMPREZA 4-Door 2.0L CVT       | 43.0758                        | [18000]                              |
| 6               | IMPREZA 5-Door 2.0L CVT       | 42.9731                        | [36000]                              |
| 30              | IMPREZA SPORT 4-Door 2.0L CVT | 41.4234                        | [3600]                               |
| 28              | IMPREZA SPORT 5-Door 2.0L CVT | 41.1536                        | [7200]                               |
| 8               | LEGACY 2.5L CVT               | 38.4744                        | [69936]                              |
| 13              | LEGACY 3.6L CVT               | 30.0710                        | [5664]                               |
| 24              | WRX 2.0L DI Turbo 6MT         | 30.3240                        | [5964]                               |
| 25              | WRX 2.0L DI Turbo CVT         | 26.8422                        | [2664]                               |
| 26              | WRX STI 2.5L Turbo 6MT        | 25.1277                        | [4620]                               |
|                 |                               | Total                          | [167808]                             |
|                 |                               | Projected Average Fuel Economy | 38.2                                 |



**49 CFR 537.7(b)(2):** No running changes which may affect the projected average fuel economy will be performed on 2017 vehicles in the future.

**49 CFR 537.7(b)(3):** Projected required fuel economy determined in accordance with 49 CFR 531.5(c) and based upon the projected sales figures provided per 49 CFR 537.7(c)(2):

- Passenger Automobiles (Import): **39.7 mpg**

**49 CFR 537.7(b)(4):** No running changes which may affect the projected final required fuel economy will be performed on 2017 vehicles in the future.

**49 CFR 537.7(b)(5):** NASI believes that the projections provided above, pursuant to 49 CFR Part 537.7(b)(1) and 49 CFR Part 537.7(b)(3), sufficiently represents the manufacturer's average and required fuel economy for the 2017 model year for the purposes of the Act.

**537.7(c)(1), (c)(3)-(c4):** Please see page no.'s 5-6.

**Subaru Light Trucks:** Pursuant to 49 CFR Part 537.7(a)(2), NASI submits the following:

**49 CFR 537.7(b)(1) and 537.7(c)(2):** Projected average fuel economy per 49 CFR 537.7(b)(1) and Combined fuel economy, projected sales, and total sales per 49 CFR 537.7(c)(2): **Subaru Light Trucks**

| Model type code | Model Type                 | Combined Fuel Economy                 | Projected Sales Volume By Model Type |
|-----------------|----------------------------|---------------------------------------|--------------------------------------|
| 14              | CROSSTREK 2.0L 5MT         | 34.2039                               | [4860]                               |
| 15              | CROSSTREK 2.0L CVT         | 38.5928                               | [59940]                              |
| 16              | FORESTER 2.5L 6MT          | 32.0574                               | [10080]                              |
| 18              | FORESTER 2.5L CVT          | 37.9874                               | [126000]                             |
| 20              | FORESTER 2.0L DI Turbo CVT | 33.0010                               | [7920]                               |
| 19              | OUTBACK 2.5L CVT           | 37.4345                               | [132264]                             |
| 21              | OUTBACK 3.6L CVT           | 29.3442                               | [25764]                              |
|                 |                            | Total                                 | [366828]                             |
|                 |                            | <b>Projected Average Fuel Economy</b> | <b>36.8</b>                          |

**49 CFR 537.7(b)(2):** No running changes which may affect the projected average fuel economy will be performed on 2017 vehicles in the future.

**49 CFR 537.7(b)(3):** Projected required fuel economy determined in accordance with 49 CFR 533.5(i) and based upon the projected sales figures provided under 49 CFR 537.7(c)(2):

- Light Trucks: **33.6 mpg**

**49 CFR 537.7(b)(4):** No running changes which may affect the projected final required fuel economy will be performed on 2017 vehicles in the future.

**537.7(b)(5):** NASI believes that the projections provided above, pursuant to 49 CFR Part 537.7(b)(1) and 49 CFR Part 537.7(b)(3), sufficiently represents the manufacturer's average and required fuel economy for the 2017 model year for the purposes of the Act.

**537.7(c)(1), (c)(3)-(c4):** Please see page no. 5-7.

Table 537.7 (c )(3) - Technical Information

Light Truck

| Model Type Code | Mode Type                  | Loaded Vehicle Weight (lbs) | ETW (lbs) | Engine Displacement (liters) | SAE Net Rated Power (kilowatts) | SAE Net Horsepower (hp) | Engine Code | Fuel System | Emission Control System                  | Transmission Class | Number of Forward Speeds | Existence of Overdrive | Total Drive Ratio (N/V) | Axle Ratio |
|-----------------|----------------------------|-----------------------------|-----------|------------------------------|---------------------------------|-------------------------|-------------|-------------|------------------------------------------|--------------------|--------------------------|------------------------|-------------------------|------------|
| 14              | CROSSTREK 2.0L 5MT         | 3408                        | 3375      | 2.0                          | 110 kW @ 6.200 rpm              | 148 HP @ 6.200 rpm      | H2.0SMA     | SFI         | TWC(2)/WR-HO2S/HO2S/SFI /EGR/EGRC        | Manual-5           | 5                        | Yes                    | 45.5                    | 4.44       |
| 15              | CROSSTREK 2.0L CVT         | 3508                        | 3500      |                              |                                 |                         | H2.0SCA     |             |                                          | CVT                | 1                        |                        | 27.7                    | 3.70       |
| 16              | FORESTER 2.5L 6MT          | 3660                        | 3625      | 2.5                          | 127 kW @5800 rpm                | 170 HP @5800 rpm        | H2.5FMB     |             |                                          | Manual-6           | 6                        |                        | 39.4                    | 4.44       |
| 18              | FORESTER 2.5L CVT          | 3757                        | 3750      |                              |                                 |                         | H2.5FCB     |             |                                          | CVT                | 1                        |                        | 26.9<br>26.6            | 3.70       |
| 19              | OUTBACK 2.5L CVT           | 3982                        | 4000      |                              | 130 kW @ 5800 rpm               | 175 HP @ 5800 rpm       | H2.5GCA     |             | TWC(2)/WR-HO2S/HO2S/SFI /EGR/EGRC        | CVT                | 1                        |                        | 29.0<br>28.7            | 4.11       |
|                 |                            |                             |           |                              |                                 |                         | H2.5FCB     |             |                                          |                    |                          |                        |                         |            |
| 20              | FORESTER 2.0L DI Turbo CVT | 4012                        | 4000      | 2.0                          | 186 kW @5600 rpm                | 250 HP @5600 rpm        | H2.0CDB     | DFI         | TWC(2)/WR-HO2S/HO2S/TC/CAC/DFI /EGR/EGRC | CVT                | 1                        |                        | 28.2                    | 4.11       |
| 21              | OUTBACK 3.6L CVT           | 4156                        | 4250      | 3.6                          | 191 kW @6000 rpm                | 256 HP @6000 rpm        | H3.6HDA     | SFI         | 2TWC(2)/WR-HO2S(2)/HO2S(2)/SFI /EGR      | CVT                | 1                        |                        | 24.5<br>24.3            | 4.11       |

Import Passenger Car

| Model Type Code | Mode Type                     | Loaded Vehicle Weight (lbs) | ETW (lbs) | Engine Displacement (liters) | SAE Net Rated Power (kilowatts) | SAE Net Hosepower (hp) | Engine Code | Fuel System | Emission Control System                  | Transmission Class | Number of Forward Speeds | Existence of Overdrive | Total Drive Ratio (N/V) | Axle Ratio |  |
|-----------------|-------------------------------|-----------------------------|-----------|------------------------------|---------------------------------|------------------------|-------------|-------------|------------------------------------------|--------------------|--------------------------|------------------------|-------------------------|------------|--|
| 1               | BRZ 2.0L 6MT                  | 3113                        | 3125      | 2.0                          | 152kW @7000 rpm                 | 205 HP @7000 rpm       | H2.0CMC     | SFI & DFI   | TWC(2)/WR-HO2S/HO2S/SFI/DFI              | Manual-6           | 6                        | YES                    | 46.3                    | 4.30       |  |
| 2               | BRZ 2.0L 6AT                  | 3135                        | 3125      |                              | 149 kW @7000 rpm                | 200 HP @7000 rpm       | H2.0CAC     |             |                                          | Automatic-6        | 6                        |                        | 33.5                    | 4.10       |  |
| 3               | IMPREZA 4-Door 2.0L 5MT       | 3285                        | 3250      | 2.0                          | 113 kW @ 6.000 rpm              | 152 HP @ 6.000 rpm     | H2.0EMD     | DFI         | TWC(2)/WR-HO2S/HO2S/DFI /EGR/EGRC        | Manual-5           | 5                        |                        | 42.5                    | 4.11       |  |
| 4               | IMPREZA 5-Door 2.0L 5MT       | 3296                        | 3375      |                              |                                 |                        | H2.0EMD     |             |                                          | CVT                | 1                        |                        | 42.5                    | 4.11       |  |
| 5               | IMPREZA 4-Door 2.0L CVT       | 3391                        | 3375      |                              |                                 |                        | H2.0ECD     |             |                                          |                    |                          |                        | 25.4<br>25.3            | 3.70       |  |
| 6               | IMPREZA 5-Door 2.0L CVT       | 3411                        | 3375      |                              |                                 |                        | H2.0ECD     |             |                                          |                    |                          |                        | 25.4<br>25.3            | 3.70       |  |
| 27              | IMPREZA SPORT 5-Door 2.0L 5MT | 3435                        | 3500      |                              |                                 |                        | H2.0EMD     |             |                                          | Manual-5           | 5                        |                        | 41.8                    | 4.11       |  |
| 28              | IMPREZA SPORT 5-Door 2.0L CVT | 3495                        | 3500      |                              |                                 |                        | H2.0ECD     |             |                                          | CVT                | 1                        |                        | 25.0                    | 3.70       |  |
| 29              | IMPREZA SPORT 4-Door 2.0L 5MT | 3426                        | 3500      |                              |                                 |                        | H2.0EMD     |             |                                          | Manual-5           | 5                        |                        | 41.8                    | 4.11       |  |
| 30              | IMPREZA SPORT 4-Door 2.0L CVT | 3485                        | 3500      |                              |                                 |                        | H2.0ECD     |             |                                          | CVT                | 1                        |                        | 25.0                    | 3.70       |  |
| 8               | LEGACY 2.5L CVT               | 3801                        | 3875      | 2.5                          | 130 kW @ 5800 rpm               | 175 HP @ 5800 rpm      | H2.5FCB     | SFI         | TWC(2)/WR-HO2S/HO2S/SFI /EGR/EGRC        | CVT                | 1                        |                        | 29.2<br>28.8            | 3.90       |  |
|                 |                               |                             |           |                              |                                 |                        | H2.5GCA     |             |                                          |                    |                          |                        |                         |            |  |
| 13              | LEGACY 3.6L CVT               | 4008                        | 4000      | 3.6                          | 191 kW @6000 rpm                | 256 HP @6000 rpm       | H3.6HDA     | DFI         | 2TWC(2)/WR-HO2S(2)/HO2S(2)/SFI /EGR      | CVT                | 1                        |                        | 26.0<br>25.7            | 4.11       |  |
| 24              | WRX 2.0L DI Turbo 6MT         | 3651                        | 3625      | 2.0                          | 200 kW @ 5600 rpm               | 268 HP @ 5600 rpm      | H2.0CME     |             | TWC(2)/WR-HO2S/HO2S/TC/CAC/DFI /EGR/EGRC | Manual-6           | 6                        |                        | 37.5                    | 4.11       |  |
|                 |                               | 3675                        | 3750      |                              |                                 |                        |             |             |                                          |                    | 36.8                     |                        |                         |            |  |
| 25              | WRX 2.0L DI Turbo CVT         | 3770                        | 3750      |                              |                                 |                        | H2.0CDE     |             |                                          | CVT                | 1                        |                        | 29.0                    | 3.90       |  |
|                 |                               | 3825                        | 3875      |                              |                                 |                        |             |             |                                          |                    | 28.5                     |                        |                         |            |  |
| 26              | WRX STI 2.5L Turbo 6MT        | 3755                        | 3750      | 2.5                          | 227 kW @6000 rpm                | 305 HP @6000 rpm       | H2.5CMG     | SFI         | TWC(2)/WR-HO2S/HO2S/TC/CAC/SFI /AIR      | Manual-6           | 6                        |                        | 39.6                    | 3.90       |  |

Table 537.7 (b)(3) &amp; (c)(3) - Technical Information

## Light Truck

| Light Truck     |                            |                                       |                                   |           |                          |                         |                            |                |                    |                                   |                           |                        |                                    |                    |
|-----------------|----------------------------|---------------------------------------|-----------------------------------|-----------|--------------------------|-------------------------|----------------------------|----------------|--------------------|-----------------------------------|---------------------------|------------------------|------------------------------------|--------------------|
| Model Type Code | Mode Type                  | Passenger-Carrying Volume (cubic ft.) | Cargo-Carrying Volume (cubic ft.) | Base Tire | Track Width - Front (in) | Track Width - Rear (in) | Track Width - Average (in) | Wheelbase (in) | Footprint (feet^2) | Function Described in 523.5(a)(5) | Temporary Living Quarters | Frontal Area (sq. ft.) | Road Load Horse Power @50 mph (hp) | Optional Equipment |
| 14              | CROSSTREK 2.0L 5MT         | 97.5                                  | 22.3                              | 225/55R17 | 60.0                     | 60.0                    | 60.0                       | 103.7          | 43.2               | No                                | No                        | 26.1                   | 13.2                               | ---                |
| 15              | CROSSTREK 2.0L CVT         |                                       |                                   |           |                          |                         |                            |                |                    |                                   |                           |                        | 13.3                               |                    |
| 16              | FORESTER 2.5L 6MT          | 108.3                                 | 34.4                              | 225/60R17 | 60.9                     | 61.2                    | 61.1                       | 103.9          | 44.0               |                                   |                           | 28.5                   | 13.5                               |                    |
| 18              | FORESTER 2.5L CVT          |                                       |                                   |           |                          |                         |                            |                |                    |                                   |                           |                        | 13.3                               |                    |
| 19              | OUTBACK 2.5L CVT           | 108.1                                 | 35.5                              | 225/65R17 | 61.8                     | 62.2                    | 62.0                       | 108.1          | 46.5               |                                   |                           | 27.3                   | 12.9                               |                    |
| 20              | FORESTER 2.0L DI Turbo CVT | 108.3                                 | 34.4                              | 225/55R18 | 60.9                     | 61.2                    | 61.1                       | 103.9          | 44.0               |                                   |                           | 28.5                   | 14.0                               |                    |
| 21              | OUTBACK 3.6L CVT           | 108.1                                 | 35.5                              | 225/60R18 | 61.8                     | 62.2                    | 62.0                       | 108.1          | 46.5               |                                   |                           | 27.3                   | 13.0                               |                    |

## Import Passenger Car

| Model Type Code | Mode Type                    | Interior Volume Index (cubic ft.) | Body Style | Base Tire | Track Width - Front (in) | Track Width - Rear (in) | Track Width - Average (in) | Wheelbase (in) | Footprint (feet^2) | Function Described in 523.5(a)(5) | Temporary Living Quarters | Frontal Area (sq. ft.) | Road Load Power @ 50 mph (hp) | Optional Equipment |
|-----------------|------------------------------|-----------------------------------|------------|-----------|--------------------------|-------------------------|----------------------------|----------------|--------------------|-----------------------------------|---------------------------|------------------------|-------------------------------|--------------------|
| 1               | BRZ 2.0L 6MT                 | 83.4                              | 2D Coupe   | 215/45R17 | 59.8                     | 60.6                    | 60.2                       | 101.2          | 42.3               | No                                | No                        | 21.4                   | 11.7                          | ---                |
| 2               | BRZ 2.0L 6AT                 | 83.4                              | 2D Coupe   | 215/45R17 |                          |                         |                            |                |                    |                                   |                           |                        | 11.4                          |                    |
| 3               | IMPREZA 4-Door 2.0L 5MT      | 112.1                             | 4D Sedan   | 205/55R16 | 60.6                     | 60.8                    | 60.7                       | 105.1          | 44.3               |                                   |                           | 25.0                   | 11.9                          |                    |
| 4               | IMPREZA 5-Door 2.0L 5MT      | 121.7                             | 5D Wagon   | 205/55R16 |                          |                         |                            |                |                    |                                   |                           |                        | 12.4                          |                    |
| 5               | IMPREZA 4-Door 2.0L CVT      | 112.1                             | 4D Sedan   | 205/55R16 |                          |                         |                            |                |                    |                                   |                           |                        | 11.4                          |                    |
| 6               | IMPREZA 5-Door 2.0L CVT      | 121.7                             | 5D Wagon   | 205/55R16 |                          |                         |                            |                |                    |                                   |                           |                        | 11.7                          |                    |
| 27              | IMPREZA SPORT 5-Door 2.0L 5M | 121.7                             | 5D Wagon   | 225/40R18 |                          |                         |                            |                |                    |                                   |                           | 25.1                   | 13.1                          |                    |
| 28              | IMPREZA SPORT 5-Door 2.0L C  | 121.7                             | 5D Wagon   | 225/40R18 |                          |                         |                            |                |                    |                                   |                           |                        | 12.3                          |                    |
| 29              | IMPREZA SPORT 4-Door 2.0L 5M | 112.1                             | 4D Sedan   | 225/40R18 |                          |                         |                            |                |                    |                                   |                           |                        | 12.6                          |                    |
| 30              | IMPREZA SPORT 4-Door 2.0L C  | 112.1                             | 4D Sedan   | 225/40R18 |                          |                         |                            |                |                    |                                   |                           |                        | 12.1                          |                    |
| 8               | LEGACY 2.5L CVT              | 119.6                             | 4D Sedan   | 225/55R17 | 62.2                     | 62.8                    | 62.5                       | 108.3          | 47.0               |                                   |                           | 25.6                   | 12.2                          |                    |
| 13              | LEGACY 3.6L CVT              | 119.6                             | 4D Sedan   | 225/50R18 | 62.2                     | 62.8                    | 62.5                       | 108.3          | 47.0               |                                   |                           |                        | 11.5                          |                    |
| 24              | WRX 2.0L DI Turbo 6MT        | 108.9                             | 4D Sedan   | 235/45R17 | 60.2                     | 60.6                    | 60.4                       | 104.3          | 43.7               |                                   |                           | 25.6                   | 14.0                          |                    |
| 25              | WRX 2.0L DI Turbo CVT        | 108.9                             | 4D Sedan   | 235/45R17 |                          |                         |                            |                |                    |                                   |                           |                        | 13.1                          |                    |
| 26              | WRX STI 2.5L Turbo 6MT       | 108.9                             | 4D Sedan   | 245/40R18 |                          |                         |                            |                |                    |                                   |                           | 25.7                   | 15.5                          |                    |

| Model Type Code | Model Type                 | Transmission Type | Approach Angle[degrees] | Breakover Angle[degrees] | Departure Angle[degrees] | Running Clearance [inches] | Front Axle Clearance[inches] | Rear Axle Clearance[inches] |
|-----------------|----------------------------|-------------------|-------------------------|--------------------------|--------------------------|----------------------------|------------------------------|-----------------------------|
|                 |                            |                   | > 28 degrees            | > 14 degrees             | > 20 degrees             | > 20 cm (7.9 inches)       | > 18 cm (7.1 inches)         |                             |
| 14              | CROSSTREK 2.0L 5MT         | AWD-5MT           | 18.1                    | 21.1                     | 27.7                     | 8.7                        | 13.2                         | 13.6                        |
| 15              | CROSSTREK 2.0L CVT         | AWD-CVT           | 18.1                    | 21.1                     | 27.7                     | 8.7                        | 13.2                         | 13.6                        |
| 16              | FORESTER 2.5L 6MT          | AWD-6MT           | 22.9                    | 21.1                     | 24.5                     | 8.7                        | 8.8                          | 9.1                         |
| 18              | FORESTER 2.5L CVT          | AWD-CVT           | 22.9                    | 20.7                     | 24.5                     | 8.7                        | 8.8                          | 9.1                         |
| 19              | OUTBACK 2.5L CVT           | AWD-CVT           | 18.4                    | 20.0                     | 22.7                     | 8.7                        | 8.7                          | 10.2                        |
| 20              | FORESTER 2.0L DI Turbo CVT | AWD-CVT           | 22.9                    | 20.2                     | 24.5                     | 8.6                        | 8.7                          | 9.1                         |
| 21              | OUTBACK 3.6L CVT           | AWD-CVT           | 18.4                    | 20.0                     | 22.7                     | 8.7                        | 8.7                          | 10.2                        |

**2017MY SUBARU Passenger Automobiles CAFE Standard -July 14, 2017**

**Model year dependent parameters used to**

| <b>MFR</b>                | <b>Model Year</b> | <b>Compliance Category</b> | <b>MFR Final Reformed CAFE Standard (mpg)</b> | <b>Unrounded Reformed CAFE Standard Discrepancy Value (mpg)</b> | <b>Mfr Calculated Reformed CAFE Standard (4 decimal places) (mpg)</b> | <b>a:</b>    | <b>b:</b>    | <b>c:</b>        | <b>d:</b>     | <b>Total Production</b> |
|---------------------------|-------------------|----------------------------|-----------------------------------------------|-----------------------------------------------------------------|-----------------------------------------------------------------------|--------------|--------------|------------------|---------------|-------------------------|
| <b>SUBARU CORPORATION</b> | <b>2017</b>       | <b>Import Passenger</b>    | <b>39.7</b>                                   | <b>0</b>                                                        | <b>39.7074</b>                                                        | <b>43.61</b> | <b>32.65</b> | <b>0.0005131</b> | <b>0.0019</b> | <b>167808</b>           |

The required fuel economy level (Domestic) = Not applicable

Footprint informations for calculating the required fuel economy (Import)

| Model Type Index | Carline MFR Code | Division Code | Carline code | Vehicle Class [GHG] | Import /Domestic [CAFE] | Carline Name        | Basic Engine Index | Verify Transmission Configuration Code | Transmission Class Name | Model Type Footprint Description | Wheel base (inches) | Front Track Width (inches) | Rear Track Width (inches) | Avg Track Width (inches) | Footprint (square feet) | Footprint Final Model Year Production Units | MFR Footprint Target FE Value (mpg rounded to two decimal places) |
|------------------|------------------|---------------|--------------|---------------------|-------------------------|---------------------|--------------------|----------------------------------------|-------------------------|----------------------------------|---------------------|----------------------------|---------------------------|--------------------------|-------------------------|---------------------------------------------|-------------------------------------------------------------------|
| 1                | FJX              | 1             | 10           | LDV                 | Import                  | BRZ                 | 1                  | 80                                     | M6                      | 2.0L NA model                    | 101.2               | 59.8                       | 60.6                      | 60.2                     | 42.3                    | 5424                                        | 42.37                                                             |
| 2                | FJX              | 1             | 10           | LDV                 | Import                  | BRZ                 | 1                  | 16                                     | S6                      | 2.0L NA model                    | 101.2               | 59.8                       | 60.6                      | 60.2                     | 42.3                    | 1536                                        | 42.37                                                             |
| 3                | FJX              | 1             | 45           | LDV                 | Import                  | IMPENZA 4-Door      | 2                  | 16                                     | M5                      | 2.0L NA model                    | 105.1               | 60.6                       | 60.8                      | 60.7                     | 44.3                    | 1200                                        | 40.61                                                             |
| 4                | FJX              | 1             | 45           | LDV                 | Import                  | IMPENZA 4-Door      | 2                  | 79                                     | CVT                     | 2.0L NA model                    | 105.1               | 60.6                       | 60.8                      | 60.7                     | 44.3                    | 18000                                       | 40.61                                                             |
| 5                | FJX              | 1             | 55           | LDV                 | Import                  | IMPENZA 5-Door      | 2                  | 78                                     | M5                      | 2.0L NA model                    | 105.1               | 60.6                       | 60.8                      | 60.7                     | 44.3                    | 2400                                        | 40.61                                                             |
| 6                | FJX              | 1             | 55           | LDV                 | Import                  | IMPENZA 5-Door      | 2                  | 79                                     | CVT                     | 2.0L NA model                    | 105.1               | 60.6                       | 60.8                      | 60.7                     | 44.3                    | 36000                                       | 40.61                                                             |
| 27               | FJX              | 1             | 50           | LDV                 | Import                  | IMPENZA SPORT 4Door | 2                  | 78                                     | M5                      | 2.0L NA model                    | 105.1               | 60.6                       | 60.8                      | 60.7                     | 44.3                    | 1200                                        | 40.61                                                             |
| 28               | FJX              | 1             | 50           | LDV                 | Import                  | IMPENZA SPORT 4Door | 2                  | 79                                     | CVT                     | 2.0L NA model                    | 105.1               | 60.6                       | 60.8                      | 60.7                     | 44.3                    | 3600                                        | 40.61                                                             |
| 29               | FJX              | 1             | 85           | LDV                 | Import                  | IMPENZA SPORT 5Door | 2                  | 78                                     | M5                      | 2.0L NA model                    | 105.1               | 60.6                       | 60.8                      | 60.7                     | 44.3                    | 2400                                        | 40.61                                                             |
| 30               | FJX              | 1             | 85           | LDV                 | Import                  | IMPENZA SPORT 5Door | 2                  | 79                                     | CVT                     | 2.0L NA model                    | 105.1               | 60.6                       | 60.8                      | 60.7                     | 44.3                    | 7200                                        | 40.61                                                             |
| 8                | FJX              | 1             | 65           | LDV                 | Import                  | LEGACY              | 3                  | 75                                     | CVT                     | 2.5L NA model                    | 108.3               | 62.2                       | 62.8                      | 62.5                     | 47.0                    | 69936                                       | 38.44                                                             |
| 13               | FJX              | 1             | 65           | LDV                 | Import                  | LEGACY              | 4                  | 27                                     | CVT                     | 3.6L NA model                    | 108.3               | 62.2                       | 62.8                      | 62.5                     | 47.0                    | 5664                                        | 38.44                                                             |
| 24               | FJX              | 1             | 25           | LDV                 | Import                  | WRX                 | 5                  | 26                                     | M6                      | 2.0L Turbo model                 | 104.3               | 60.2                       | 60.6                      | 60.4                     | 43.7                    | 5964                                        | 41.12                                                             |
| 25               | FJX              | 1             | 25           | LDV                 | Import                  | WRX                 | 5                  | 26                                     | CVT                     | 2.0L Turbo model                 | 104.3               | 60.2                       | 60.6                      | 60.4                     | 43.7                    | 2664                                        | 41.12                                                             |
| 26               | FJX              | 1             | 25           | LDV                 | Import                  | WRX (STI)           | 6                  | 71                                     | M6                      | 2.5L Turbo model                 | 104.3               | 60.2                       | 60.6                      | 60.4                     | 43.7                    | 4620                                        | 41.12                                                             |

- Method of measuring wheelbase & track width and calculating vehicle footprint : SAE J1100

**2017MY SUBARU Passenger Automobiles CAFE Standard -December 15, 2016**

**Model year dependent parameters used to calculate**

| <b><u>MFR</u></b>          | <b><u>Model Year</u></b> | <b><u>Compliance Category</u></b> | <b><u>MFR Final Reformed CAFE Standard (mpg)</u></b> | <b><u>Unrounded Reformed CAFE Standard Discrepancy Value (mpg)</u></b> | <b><u>Mfr Calculated Reformed CAFE Standard (4 decimal places) (mpg)</u></b> | <b><u>a:</u></b> | <b><u>b:</u></b> | <b><u>c:</u></b> | <b><u>d:</u></b> | <b><u>e:</u></b> | <b><u>f:</u></b> | <b><u>g:</u></b> | <b><u>h:</u></b> | <b><u>Total Production</u></b> |
|----------------------------|--------------------------|-----------------------------------|------------------------------------------------------|------------------------------------------------------------------------|------------------------------------------------------------------------------|------------------|------------------|------------------|------------------|------------------|------------------|------------------|------------------|--------------------------------|
| Fuji Heavy Industries Ltd. | 2017                     | Import Passenger                  | 33.6                                                 | 0                                                                      | 33.6263                                                                      | 36.26            | 25.09            | 0.0005484        | 0.005097         | 35.10            | 25.09            | 0.0004546        | 0.009851         | 366828                         |

The required fuel economy level (Domestic) = Not applicable

Footprint informations for calculating the required fuel economy (Import)

| <b><u>Model Type Index</u></b> | <b><u>Carline MFR Code</u></b> | <b><u>Division Code</u></b> | <b><u>Carline code</u></b> | <b><u>Vehicle Class [GHG]</u></b> | <b><u>Carline Name</u></b> | <b><u>Basic Engine Index</u></b> | <b><u>Verify Transmission Configuration Code</u></b> | <b><u>Transmission Class Name</u></b> | <b><u>Model Type Footprint Description</u></b> | <b><u>Wheel base (inches)</u></b> | <b><u>Front Track Width (inches)</u></b> | <b><u>Rear Track Width (inches)</u></b> | <b><u>Avg Track Width (inches)</u></b> | <b><u>Footprint (square feet)</u></b> | <b><u>Footprint Final Model Year Production Units</u></b> | <b><u>MFR Footprint Target FE Value (mpg rounded to two decimal places)</u></b> |
|--------------------------------|--------------------------------|-----------------------------|----------------------------|-----------------------------------|----------------------------|----------------------------------|------------------------------------------------------|---------------------------------------|------------------------------------------------|-----------------------------------|------------------------------------------|-----------------------------------------|----------------------------------------|---------------------------------------|-----------------------------------------------------------|---------------------------------------------------------------------------------|
| 14                             | FJX                            | 1                           | 35                         | LDT                               | CROSSTREK                  | 1                                | 7                                                    | M5                                    | 2.0L NA model                                  | 103.7                             | 60.0                                     | 60.0                                    | 60.0                                   | 43.2                                  | 4860                                                      | 34.74                                                                           |
| 15                             | FJX                            | 1                           | 35                         | LDT                               | CROSSTREK                  | 1                                | 23                                                   | S1                                    | 2.0L NA model                                  | 103.7                             | 60.0                                     | 60.0                                    | 60.0                                   | 43.2                                  | 59940                                                     | 34.74                                                                           |
| 16                             | FJX                            | 1                           | 95                         | LDT                               | FORESTER                   | 2                                | 10                                                   | M6                                    | 2.5L NA model                                  | 103.9                             | 60.9                                     | 61.2                                    | 61.1                                   | 44.0                                  | 10080                                                     | 34.22                                                                           |
| 18                             | FJX                            | 1                           | 95                         | LDT                               | FORESTER                   | 2                                | 24                                                   | S1                                    | 2.5L NA model                                  | 103.9                             | 60.9                                     | 61.2                                    | 61.1                                   | 44.0                                  | 126000                                                    | 34.22                                                                           |
| 19                             | FJX                            | 1                           | 70                         | LDT                               | OUTBACK                    | 3                                | 76                                                   | S1                                    | 2.5L NA model                                  | 108.1                             | 61.8                                     | 62.2                                    | 62.0                                   | 46.5                                  | 132264                                                    | 32.68                                                                           |
| 20                             | FJX                            | 1                           | 95                         | LDT                               | FORESTER                   | 5                                | 26                                                   | S1                                    | 2.0L Turbo model                               | 103.9                             | 60.9                                     | 61.2                                    | 61.05                                  | 44.0                                  | 7920                                                      | 34.22                                                                           |
| 21                             | FJX                            | 1                           | 70                         | LDT                               | OUTBACK                    | 4                                | 74                                                   | S1                                    | 3.6L NA model                                  | 108.1                             | 61.8                                     | 62.2                                    | 62.0                                   | 46.5                                  | 25764                                                     | 32.68                                                                           |

- Method of measuring wheelbase & track width and calculating vehicle footprint : SAE J1100