



**Fuji Heavy Industries U.S.A., Inc.**  
c/o Subaru of America  
Subaru Plaza  
PO Box 6000  
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December 28, 2016

[REDACTED]

Mr. Mark Rosekind  
NHTSA Administrator, NOA-010  
National Highway Traffic Safety Administration  
1200 New Jersey Ave., West Building  
Washington, DC 20590

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

Dear Mr. Rosekind:

Pursuant to 49 CFR Part 537, Fuji Heavy Industries USA, Inc ("FUSA"), on behalf of Fuji Heavy Industries Ltd. and Subaru of America, Inc., submits the following:

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

(c)(2) Fuji Heavy Industries, Ltd.

(c)(3) Mr. David Barker, Energy and Environmental Activities Manager  
Government Relations  
Fuji Heavy Industries USA, Inc.  
PO Box 6000  
Cherry Hill, NJ 08034-6000

(c)(4) Submitted by mail on CD-ROM with [REDACTED] business information (enclosed)

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

(c)(7) FUSA considers portions of the enclosed to be "[REDACTED] Business Information," and has submitted a request to Chief Counsel's office, pursuant to Part 512. [REDACTED]  
[REDACTED]

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

Sincerely,


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	[1200]
3	IMPENZA 4-Door 2.0L 5MT	35.7850	[1200]
4	IMPENZA 5-Door 2.0L 5MT	35.3520	[2400]
29	IMPENZA SPORT 4-Door 2.0L 5MT	35.0701	[1200]
27	IMPENZA SPORT 5-Door 2.0L 5MT	33.6471	[2400]
5	IMPENZA 4-Door 2.0L CVT	43.0758	[18000]
6	IMPENZA 5-Door 2.0L CVT	42.9731	[36000]
30	IMPENZA SPORT 4-Door 2.0L CVT	41.4234	[3600]
28	IMPENZA 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	[167472]
		<b>Projected Average Fuel Economy</b>	<b>38.3</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 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):** Fuji Heavy Industries USA, Inc. 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 6-7.



**Subaru Light Trucks:** Pursuant to 49 CFR Part 537.7(a)(2), 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 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):** Fuji Heavy Industries USA, Inc. 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 6-8.

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	3519	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	SFI	TWC(2)/WR-HO2S/HO2S/SFI /EGR/EGRC	Manual-6	6	Yes	39.4	4.44	
18	FORESTER 2.5L CVT	3757	3750				H2.5FCB			CVT			1	26.9	3.70
19	OUTBACK 2.5L CVT	3971	4000				H2.5GCA			CVT			1	Yes	26.6
				H2.5FCB	28.7										
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	Yes	28.2	4.11	
21	OUTBACK 3.6L CVT	4149	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	Yes	24.5	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 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						
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	3089	3125				H2.0CAC			Automatic-6			6	33.5	4.10					
3	IMPENZA 4-Door 2.0L 5MT	3285	3250				113 kW @ 6,000 rpm	152 HP @ 6,000 rpm	H2.0EMD	DFI	TWC(2)/WR-HO2S/HO2S/DFI /EGR/EGRC	Manual-5	5	Yes	42.5	4.11				
4	IMPENZA 5-Door 2.0L 5MT	3296	3375						H2.0EMD			CVT			1	Yes	42.5	4.11		
5	IMPENZA 4-Door 2.0L CVT	3391	3375						H2.0ECD								25.4	3.70		
6	IMPENZA 5-Door 2.0L CVT	3411	3375						H2.0ECD			25.3			3.70					
27	IMPENZA SPORT 5-Door 2.0L 5MT	3435	3500						H2.0EMD			Manual-5			5	41.8	4.11			
28	IMPENZA SPORT 5-Door 2.0L CV	3490	3500						H2.0ECD			CVT			1	25.0	3.70			
29	IMPENZA SPORT 4-Door 2.0L 5MT	3426	3500						H2.0EMD			Manual-5			5	41.8	4.11			
30	IMPENZA SPORT 4-Door 2.0L CV	3481	3500						H2.0ECD			CVT			1	25.0	3.70			
8	LEGACY 2.5L CVT	3799	3875	2.5	130 kW @ 5800 rpm	175 HP @ 5800 rpm			H2.5FCB			SFI			TWC(2)/WR-HO2S/HO2S/SFI /EGR/EGRC	CVT	1	Yes	29.2	3.90
				H2.5GCA	288															
13	LEGACY 3.6L CVT	4001	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	Yes	26.0	4.11						
24	WRX 2.0L DI Turbo 6MT	3649	3625	2.0L	200 kW @ 5600 rpm	268 HP @ 5600 rpm	H2.0CME	DFI	TWC(2)/WR-HO2S/HO2S/TC/CAC/DFI /EGR/EGRC	Manual-6	6	Yes	37.5	4.11						
							36.8													
25	WRX 2.0L DI Turbo CVT	3768	3750				H2.0CDE			CVT			1	Yes	29.0	3.90				
							3819			3875			28.5							
26	WRX STI 2.5L Turbo 6MT	3755	3750	2.5L	227 kW @ 6000 rpm	305 HP @ 6000 rpm	H2.5CMG	SFI	TWC(2)/WR-HO2S/HO2S/TC/CAC/SFI /AIR	Manual-6	6	Yes	39.6	3.90						

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

## 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 Quaters	Frontal Area (sq. ft.)	Road Load Horse Power @50 mph (hp)	Optional Equipment
14	CROSTREK 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	CROSTREK 2.0L CVT											26.1	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	108.3	34.4	225/60R17 225/55R18	60.9	61.2	61.1	103.9	44.0			28.5	13.3 13.7	
19	OUTBACK 2.5L CVT	104.6	35.5	225/65R17 225/60R18	61.8	62.2	62.0	108.1	46.5			27.3	12.9 12.8	
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	104.6	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 Quaters	Frontal Area (sq. ft.)	Road Load Power @ 50 mph (hp)	Optional Equipment
1	BRZ 2.0L 6MT	83.4	2D	215/45R17	59.8	60.6	60.2	101.2	42.3	No	No	21.4	11.9	---
2	BRZ 2.0L 6AT	83.4	2D	215/45R17									11.7	
3	IMPREZA 4-Door 2.0L 5MT	112.1	4D	205/55R16	60.6	60.8	60.7	105.1	44.3			25.0	11.4	
4	IMPREZA 5-Door 2.0L 5MT	121.7	5D	205/55R16									11.9	
5	IMPREZA 4-Door 2.0L CVT	112.1	4D	205/55R16 205/55R16 205/50R17									12.4	
6	IMPREZA 5-Door 2.0L CVT	121.7	5D	205/55R16 205/55R16 205/50R17									11.4	
27	IMPREZA SPORT 5-Door 2.0L 5MT	121.7	5D	225/40R18									11.7	
28	IMPREZA SPORT 5-Door 2.0L CVT	121.7	5D	225/40R18									11.6	
29	IMPREZA SPORT 4-Door 2.0L 5MT	112.1	4D	225/40R18						12.0				
30	IMPREZA SPORT 4-Door 2.0L CVT	112.1	4D	225/40R18						13.1				
8	LEGACY 2.5L CVT	119.6	4D	225/55R17 225/50R18	62.2	62.8	62.5	108.3	47.0	25.6	12.2			
13	LEGACY 3.6L CVT	119.6	4D	225/50R18	62.2	62.8	62.5	108.3	47.0		11.7			
24	WRX 2.0L DI Turbo 6MT	108.9	4D	235/45R17 245/40R18	60.2	60.6	60.4	104.3	43.7	25.6	14.0			
25	WRX 2.0L DI Turbo CVT	108.9	4D	235/45R17 245/40R18							15.1			
26	WRX STI 2.5L Turbo 6MT	108.9	4D	245/40R18							13.1			
										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	23.0	21.0	25.0	8.7	8.8	9.1
18	FORESTER 2.5L CVT	AWD-CVT	23.0	21.0	25.0	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



**(1)Light Truck (LT)**

Model type code	Model Type	Model Type City FE (mpg)	Model Type Hwy FE (mpg)	Model Type Comb FE (mpg)	Projected Sales
14	CROSSTREK 2.0L 5MT	29.3000	43.0000	34.2039	4860
15	CROSSTREK 2.0L CVT	33.5000	47.4000	38.5928	59940
16	FORESTER 2.5L 6MT	27.5000	40.2000	32.0574	10080
18	FORESTER 2.5L CVT	33.3421	45.7835	37.9874	126000
20	FORESTER 2.0L DI Turbo CVT	29.5000	38.6000	33.0010	7920
19	OUTBACK 2.5L CVT	32.3027	46.4545	37.4345	132264
21	OUTBACK 3.6L CVT	24.7000	38.1000	29.3442	25764

Total 366828

Category	Projected Sales	Unrounded CAFE	-	CAFE (mpg)	CAFE Standard (mpg)	Credit/Debit
LT	366828	36.7543	-	36.8	33.63	11,628,448

**(2)Passenger Automobile (PA) Import & Domestic**

Model type code	Model Type	Model Type City FE (mpg)	Model Type Hwy FE (mpg)	Model Type Comb FE (mpg)	Projected Sales
1	BRZ 2.0L 6MT	26.8283	41.5452	31.9159	5424
2	BRZ 2.0L 6AT	31.3000	47.3000	36.9200	1200
3	IMPREZA 4-Door 2.0L 5MT	30.5000	45.4000	35.7850	1200
4	IMPREZA 5-Door 2.0L 5MT	30.3000	44.4000	35.3520	2400
29	IMPREZA SPORT 4-Door 2.0L 5MT	30.0000	44.2000	35.0701	1200
27	IMPREZA SPORT 5-Door 2.0L 5MT	28.6000	42.9000	33.6471	2400
5	IMPREZA 4-Door 2.0L CVT	36.4519	55.3743	43.0758	18000
6	IMPREZA 5-Door 2.0L CVT	36.9090	53.7709	42.9731	36000
30	IMPREZA SPORT 4-Door 2.0L CVT	35.4000	52.3000	41.4234	3600
28	IMPREZA SPORT 5-Door 2.0L CVT	35.5000	51.1000	41.1536	7200
8	LEGACY 2.5L CVT	32.8302	48.7097	38.4744	69936
13	LEGACY 3.6L CVT	24.9000	40.3000	30.0710	5664
24	WRX 2.0L DI Turbo 6MT	25.8538	38.4492	30.3240	5964
25	WRX 2.0L DI Turbo CVT	23.0070	33.7104	26.8422	2664
26	WRX STI 2.5L Turbo 6MT	21.3000	32.2000	25.1277	4620

Total 167472

Category	Projected Sales	Unrounded unadjusted CAFE (mpg)	Unrounded adjusted CAFE (mpg)	CAFE (mpg)	CAFE Standard (mpg)	Credit/Debit	2017MY Minimum standard (mpg)
PA Import	167472	37.9666	38.2500	38.3	39.71	-2,361,355	-
PA Domestic	0	0.0000	0.0000	0.0	---	#VALUE!	36.7

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

**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>Mir 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>Fuji Heavy Industries Ltd.</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	5760	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	1200	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>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>e:</b>	<b>f:</b>	<b>g:</b>	<b>h:</b>	<b>Total Production</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)

Model Type Index	Carline MFR Code	Division Code	Carline code	Vehicle Class [GHG]	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)
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