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December 29, 2017

Includes [REDACTED] Business Information (CBI)

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

RE: MY2018 Pre-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) 2018 Pre-Model Year Report–Passenger Automobiles & Light Trucks

(c)(2) Subaru Corporation

(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 NHTSA secure email, cafe@nhtsa.gov, with [REDACTED] business information (enclosed)

(c)(5) 2018 Model Year Passenger Cars (Import) and 2018 Model Year Light-Truck Fleets

(c)(7) NASI 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] 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,

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	31.7343	[3000]
2	BRZ 2.0L 6AT	36.9200	[1104]
3	IMPREZA 4-Door 2.0L 5MT	35.7850	[1200]
4	IMPREZA 5-Door 2.0L 5MT	35.3520	[2400]
5	IMPREZA 4-Door 2.0L CVT	43.0671	[18084]
6	IMPREZA 5-Door 2.0L CVT	42.9731	[36000]
8	LEGACY 2.5L CVT	38.4637	[51372]
13	LEGACY 3.6L CVT	30.0710	[3708]
24	WRX 2.0L DI Turbo 6MT	30.4792	[14268]
25	WRX 2.0L DI Turbo CVT	26.8340	[3096]
26	WRX STI 2.5L Turbo 6MT	24.1805	[3084]
27	IMPREZA SPORT 5-Door 2.0L 5MT	33.6471	[2400]
28	IMPREZA SPORT 5-Door 2.0L CVT	41.1536	[7200]
29	IMPREZA SPORT 4-Door 2.0L 5MT	35.0701	[1200]
30	IMPREZA SPORT 4-Door 2.0L CVT	41.4234	[3600]
31	BRZ tS 2.0L 6MT	30.3042	[504]
32	WRX STI TYPE RA 2.5L Turbo 6MT	23.8601	[500]
		Total	[152720]
		Projected Average Fuel Economy	37.9

49 CFR 537.7(b)(2): No running changes which may affect the projected average fuel economy will be performed on 2018 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): **41.4 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 2018 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 6MT	33.4287	[8580]
15	CROSSTREK 2.0L CVT	39.6102	[69492]
16	FORESTER 2.5L 6MT	32.0574	[4620]
18	FORESTER 2.5L CVT	37.9986	[131244]
20	OUTBACK 2.5L CVT	37.3704	[152184]
19	FORESTER 2.0L DI Turbo CVT	33.0010	[8232]
21	OUTBACK 3.6L CVT	29.3442	[33876]
		Total	[408228]
		Projected Average Fuel Economy	36.8

49 CFR 537.7(b)(2): No running changes which may affect the projected average fuel economy will be performed on 2018 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: **34.6 mpg**

49 CFR 537.7(b)(4): No running changes which may affect the projected final required fuel economy will be performed on 2018 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 2018 model year for the purposes of the Act.

537.7(c)(1), (c)(3)-(c4): Please see page no.'s 6-8.

49CFR 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 6MT	3497	3500	2.0	113 kW @ 6,000 rpm	152 HP @ 6,000 rpm	J2.0EMC	DFI	TWC(2)/WR-HO2S/HO2S/DFI /EGR/EGRC	Manual-6	6	Yes	41.8	4.44
15	CROSSTREK 2.0L CVT	3525	3500				J2.0ECD			CVT	1		25.5	3.90
		3556	3625											
16	FORESTER 2.5L 6MT	3660	3625	2.5	127 kW @ 5800 rpm	170 HP @ 5800 rpm	J2.5HMG	SFI	TWC(2)/WR-HO2S/HO2S/SFI /EGR/EGRC	Manual-6	6		39.4	4.44
18	FORESTER 2.5L CVT	3757	3750				J2.5HCH			CVT	1		26.9	3.70
		3966	4000											
19	OUTBACK 2.5L CVT	3966	4000		130 kW @ 5800 rpm	175 HP @ 5800 rpm	J2.5HCF		TWC(2)/WR-HO2S/HO2S/SFI /EGR/EGRC	CVT	1		26.1	4.11
20	FORESTER 2.0L DI Turbo CVT	4012	4000	2.0	186 kW @ 5600 rpm	250 HP @ 5600 rpm	J2.0CCJ	DFI	TWC(2)/WR-HO2S/HO2S/TC/CAC/DFI /EGR/EGRC	CVT	1		28.2	4.11
21	OUTBACK 3.6L CVT	4145	4250	3.6	191 kW @ 6000 rpm	256 HP @ 6000 rpm	J3.6GCE	SFI	2TWC(2)/WR-HO2S(2)/HO2S(2)/SFI /EGR	CVT	1		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	153kW @ 7000 rpm	205 HP @ 7000 rpm	J2.0CMR	SFI & DFI	TWC(2)/WR-HO2S/HO2S/SFI/DFI	Manual-6	6	YES	46.3	4.30
2	BRZ 2.0L 6AT	3135	3125				J2.0CAS			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	J2.0EMA	DFI	TWC(2)/WR-HO2S/HO2S/DFI /EGR/EGRC	Manual-5	5		42.5	4.11
		3327	3375				J2.0EMA							
4	IMPREZA 5-Door 2.0L 5MT	3296	3375				J2.0EMA						42.5	4.11
5	IMPREZA 4-Door 2.0L CVT	3345	3375				J2.0ECB			CVT	1		25.4	3.70
		3477	3500				J2.0ECB							
6	IMPREZA 5-Door 2.0L CVT	3358	3375				J2.0ECB						25.4	3.70
		3486	3500				J2.0ECB							
27	IMPREZA SPORT 5-Door 2.0L 5MT	3435	3500				J2.0EMA			Manual-5	5		41.8	4.11
28	IMPREZA SPORT 5-Door 2.0L CVT	3490	3500				J2.0ECB			CVT	1		25.0	3.70
29	IMPREZA SPORT 4-Door 2.0L 5MT	3426	3500				J2.0EMA			Manual-5	5		41.8	4.11
30	IMPREZA SPORT 4-Door 2.0L CVT	3481	3500				J2.0ECB			CVT	1		25.0	3.70
8	LEGACY 2.5L CVT	3799	3875	2.5	130 kW @ 5800 rpm	175 HP @ 5800 rpm	J2.5HCF	SFI	TWC(2)/WR-HO2S/HO2S/SFI /EGR/EGRC	CVT	1		26.3	3.90
13	LEGACY 3.6L CVT	3997	4000	3.6	191 kW @ 6000 rpm	256 HP @ 6000 rpm	J3.6GCE		2TWC(2)/WR-HO2S(2)/HO2S(2)/SFI /EGR	CVT	1		26.0	4.11
24	WRX 2.0L DI Turbo 6MT	3651	3625	2.0	200 kW @ 5600 rpm	268 HP @ 5600 rpm	J2.0CMK	DFI	TWC(2)/WR-HO2S/HO2S/TC/CAC/DFI /EGR/EGRC	Manual-6	6		37.5	4.11
		3675	3750											
25	WRX 2.0L DI Turbo CVT	3781	3750				J2.0CCM			CVT	1		29.0	3.90
		3819	3875											
26	WRX STI 2.5L Turbo 6MT	3763	3750	2.5	227 kW @ 6000 rpm	305 HP @ 6000 rpm	J2.5CMN	SFI	TWC(2)/WR-HO2S/HO2S/TC/CAC/SFI /AIR	Manual-6	6		39.6	3.90
		3825	3875											
32	WRX STI TYPE RA 2.5L Turbo 6MT	3695	3750	2.5	231 kW @ 5600 rpm	310 HP @ 5600 rpm	J2.5FMP	SFI	TWC(2)/WR-HO2S/HO2S/TC/CAC/SFI /AIR	Manual-6	6		39.2	3.90
31	BRZ IS 2.0L 6MT	3142	3125	2.0	153kW @ 7000 rpm	205 HP @ 7000 rpm	J2.0CMR	SFI & DFI	TWC(2)/WR-HO2S/HO2S/SFI/DFI	Manual-6	6		46.0	4.30

49 CFR Table 537.7 (b)(3) & (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 Quarters	Frontal Area (sq. ft.)	Road Load Horse Power @50 mph (hp)	Optional Equipment
14	CROSTREK 2.0L 6MT	100.9	20.8	225/60R17	61.0	61.2	61.1	104.9	44.5	No	No	26.6	13.8	---
15	CROSTREK 2.0L CVT												12.9	
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			25.1	11.9	
4	IMPREZA 5-Door 2.0L 5MT	121.7	5D Wagon	205/55R16								25.2	12.4	
5	IMPREZA 4-Door 2.0L CVT	112.1	4D Sedan	205/55R16								25.1	11.4	
6	IMPREZA 5-Door 2.0L CVT	121.7	5D Wagon	205/55R16								25.2	11.7	
27	IMPREZA SPORT 5-Door 2.0L 5MT	121.7	5D Wagon	225/40R18								25.2	13.1	
28	IMPREZA SPORT 5-Door 2.0L CVT	121.7	5D Wagon	225/40R18								12.3		
29	IMPREZA SPORT 4-Door 2.0L 5MT	112.1	4D Sedan	225/40R18								25.1	12.6	
30	IMPREZA SPORT 4-Door 2.0L CVT	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			
32	WRX STI TYPE RA 2.5L Turbo 6MT	108.9	4D Sedan	245/35R19							15.7 / 16.0			
31	BRZ 1S 2.0L 6MT	83.4	2D Coupe	215/40R18						59.8	60.6	60.2	101.2	42.3

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 6MT	AWD-6MT	18.0	19.7	29.4	8.7	7.8	7.8
15	CROSSTREK 2.0L CVT	AWD-CVT	18.0	19.7	29.4	8.7	7.8	7.8
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	18.5	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	18.5	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 6MT	29.0000	41.1000	33.4287	8580
15	CROSSTREK 2.0L CVT	34.8152	47.6274	39.6102	69492
16	FORESTER 2.5L 6MT	27.5000	40.2000	32.0574	4620
18	FORESTER 2.5L CVT	33.3505	45.8003	37.9986	131244
19	OUTBACK 2.5L CVT	32.2306	46.4175	37.3704	152184
20	FORESTER 2.0L DI Turbo CVT	29.5000	38.6000	33.0010	8232
21	OUTBACK 3.6L CVT	24.7000	38.1000	29.3442	33876

Category	Projected Sales	Unrounded unadjusted CAFE (mpg)	-	CAFE (mpg)	CAFE Standard (mpg)	Credit/Debit
LT	408228	36.8298	-	36.8	34.4	9,797,472

(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	26.7225	41.1722	31.7343	3000
2	BRZ 2.0L 6AT	31.3000	47.3000	36.9200	1104
3	IMPENZA 4-Door 2.0L 5MT	30.5000	45.4000	35.7850	1200
4	IMPENZA 5-Door 2.0L 5MT	30.3000	44.4000	35.3520	2400
5	IMPENZA 4-Door 2.0L CVT	36.4450	55.3617	43.0671	18084
6	IMPENZA 5-Door 2.0L CVT	36.9090	53.7709	42.9731	36000
8	LEGACY 2.5L CVT	32.7956	48.7646	38.4637	51372
13	LEGACY 3.6L CVT	24.9000	40.3000	30.0710	3708
24	WRX 2.0L DI Turbo 6MT	25.9880	38.6410	30.4792	14268
25	WRX 2.0L DI Turbo CVT	23.0000	33.7000	26.8340	3096
26	WRX STI 2.5L Turbo 6MT	20.5657	30.7966	24.1805	3084
27	IMPENZA SPORT 5-Door 2.0L 5MT	28.6000	42.9000	33.6471	2400
28	IMPENZA SPORT 5-Door 2.0L CVT	35.5000	51.1000	41.1536	7200
29	IMPENZA SPORT 4-Door 2.0L 5MT	30.0000	44.2000	35.0701	1200
30	IMPENZA SPORT 4-Door 2.0L CVT	35.4000	52.3000	41.4234	3600
31	BRZ tS 2.0L 6MT	25.7000	38.8000	30.3042	504
32	WRX STI TYPE RA 2.5L Turbo 6MT	20.4000	30.1000	23.8601	500

Category	Projected Sales	Unrounded unadjusted CAFE (mpg)	Unrounded adjusted CAFE (mpg)	CAFE (mpg)	CAFE Standard (mpg)	Credit/Debit	2018MY Minimum standard (mpg)
PA Import	152720	37.6544	37.9327	37.9	41.4	-5,345,200	-
PA Domestic	0	0.0000	0.0000	0.0	---	#VALUE!	38.0

2018MY SUBARU Passenger Automobiles CAFE Standard -December 15, 2017

Model year dependent parameters used to

MFR	Model Year	Compliance Category	MFR Final Reformed CAFE Standard (mpg)	Unrounded Reformed CAFE Standard Discrepancy Value (mpg)	Mfr Calculated Reformed CAFE Standard (4 decimal places) (mpg)	a:	b:	c:	d:	Total Production
SUBARU	2018	Import Passenger Car	41.4	0	41.3751	45.21	33.84	0.0004954	0.00181	152720

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	81	M6	2.0L NA model	101.2	59.8	60.6	60.2	42.3	3000	43.92
2	FJX	1	10	LDV	Import	BRZ	2	17	S6	2.0L NA model	101.2	59.8	60.6	60.2	42.3	1104	43.92
3	FJX	1	45	LDV	Import	IMPREZA 4-Door	3	78	M5	2.0L NA model	105.1	60.6	60.8	60.7	44.3	1200	42.09
5	FJX	1	45	LDV	Import	IMPREZA 4-Door	3	79	CVT	2.0L NA model	105.1	60.6	60.8	60.7	44.3	18084	42.09
4	FJX	1	55	LDV	Import	IMPREZA 5-Door	3	78	M5	2.0L NA model	105.1	60.6	60.8	60.7	44.3	2400	42.09
6	FJX	1	55	LDV	Import	IMPREZA 5-Door	3	79	CVT	2.0L NA model	105.1	60.6	60.8	60.7	44.3	36000	42.09
29	FJX	1	50	LDV	Import	IMPREZA SPORT 4Door	3	78	M5	2.0L NA model	105.1	60.6	60.8	60.7	44.3	1200	42.09
30	FJX	1	50	LDV	Import	IMPREZA SPORT 4Door	3	79	CVT	2.0L NA model	105.1	60.6	60.8	60.7	44.3	3600	42.09
27	FJX	1	85	LDV	Import	IMPREZA SPORT 5Door	3	78	M5	2.0L NA model	105.1	60.6	60.8	60.7	44.3	2400	42.09
28	FJX	1	85	LDV	Import	IMPREZA SPORT 5Door	3	79	CVT	2.0L NA model	105.1	60.6	60.8	60.7	44.3	7200	42.09
8	FJX	1	65	LDV	Import	LEGACY	4	75	CVT	2.5L NA model	108.3	62.2	62.8	62.5	47.0	51372	39.85
13	FJX	1	65	LDV	Import	LEGACY	5	27	CVT	3.6L NA model	108.3	62.2	62.8	62.5	47.0	3708	39.85
24	FJX	1	25	LDV	Import	WRX	6	72	M6	2.0L Turbo model	104.3	60.2	60.6	60.4	43.7	14268	42.63
25	FJX	1	25	LDV	Import	WRX	6	26	CVT	2.0L Turbo model	104.3	60.2	60.6	60.4	43.7	3096	42.63
26	FJX	1	25	LDV	Import	WRX (STI)	7	71	M6	2.5L Turbo model	104.3	60.2	60.6	60.4	43.7	3084	42.63
31	FJX	1	11	LDV	Import	BRZ tS	1	81	M6	2.0L NA model	101.2	59.8	60.6	60.2	42.3	504	43.92
32	FJX	1	32	LDV	Import	WRX STI TYPE RA	8	82	M6	2.5L Turbo model	104.3	60.2	60.6	60.4	43.7	500	42.63

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

2018MY SUBARU Passenger Automobiles CAFE Standard -December 15, 2017

Model year dependent parameters used to calculate

MFR	Model Year	Compliance Category	MFR Final Reformed CAFE Standard (mpg)	Unrounded Reformed CAFE Standard Discrepancy Value (mpg)	Mfr Calculated Reformed CAFE Standard (4 decimal places) (mpg)	a:	b:	c:	d:	e:	f:	g:	h:	Total Production
SUBARU	2018	Import Passenger Car	34.4	0	34.4461	37.36	25.2	0.0005358	0.004797	35.31	25.2	0.0004546	0.009682	408228

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	M6	2.0L NA model	104.9	61.0	61.2	61.1	44.5	8580	34.92
15	FJX	1	35	LDT	CROSSTREK	1	23	CVT	2.0L NA model	104.9	61.0	61.2	61.1	44.5	69492	34.92
16	FJX	1	95	LDT	FORESTER	2	10	M6	2.5L NA model	103.9	60.9	61.2	61.0	44.0	4620	35.25
18	FJX	1	95	LDT	FORESTER	2	24	CVT	2.5L NA model	103.9	60.9	61.2	61.0	44.0	131244	35.25
19	FJX	1	70	LDT	OUTBACK	3	76	CVT	2.5L NA model	108.1	61.8	62.2	62.0	46.5	152184	33.66
20	FJX	1	95	LDT	FORESTER	4	26	CVT	2.0L Turbo model	103.9	60.9	61.2	61.0	44.0	8232	35.25
21	FJX	1	70	LDT	OUTBACK	5	74	CVT	3.6L NA model	108.1	61.8	62.2	62.0	46.5	33876	33.66

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