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December 28, 2019

Includes [REDACTED] Business Information (CBI)

[REDACTED]

RE: MY2020 Pre-Model Year Corporate Average Fuel Economy Report/Subaru

Dear Administrator:

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

537.5 (c)(1) 2020 Pre-Model Year Report–Passenger Automobiles & Light Trucks

(c)(2) Subaru Corporation

(c)(3) [REDACTED]

(c)(4) [REDACTED]

(c)(5) 2020 Model Year Passenger Cars (Import) and 2020 Model Year Light-Truck Fleets

(c)(7) [REDACTED]

If there are any issues or questions regarding this submission, please do not hesitate to contact me at [REDACTED]

[REDACTED]

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

Model type code	Model Type	Combined Fuel Economy	Projected Sales Volume By Model Type
1	BRZ 2.0L 6MT	31.4568	[2400]
2	BRZ 2.0L 6AT	36.9200	[1140]
3	IMPREZA 4-Door 2.0L 5MT	35.1140	[888]
4	IMPREZA 5-Door 2.0L 5MT	35.3520	[2016]
5	IMPREZA 4-Door 2.0L CVT	42.8747	[16140]
6	IMPREZA 5-Door 2.0L CVT	41.9531	[39624]
8	LEGACY 2.5L CVT	40.8380	[36600]
13	LEGACY 2.4L DI Turbo CVT	36.0645	[3400]
24	WRX 2.0L DI Turbo 6MT	30.5581	[19644]
25	WRX 2.0L DI Turbo CVT	26.8436	[4286]
26	WRX STI 2.5L Turbo 6MT	24.1367	[10001]
27	IMPREZA SPORT 5-Door 2.0L 5MT	33.6471	[1716]
28	IMPREZA SPORT 5-Door 2.0L CVT	41.1536	[11772]
29	IMPREZA SPORT 4-Door 2.0L 5MT	35.0701	[1044]
30	IMPREZA SPORT 4-Door 2.0L CVT	41.4234	[6888]
31	BRZ tS 2.0L 6MT	30.3042	[300]
		Total	[157859]
		Projected Average Fuel Economy	37.3

49 CFR 537.7(b)(2): No running changes which may affect the projected average fuel economy will be performed on 2020 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): **44.9 mpg**

49 CFR 537.7(b)(4): No running changes which may affect the projected final required fuel economy will be performed on 2020 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 2020 model year for the purposes of the Act.

537.7(c)(1), (c)(3)-(c5): Please see attachment page no.'s 6-7.

537.7(c)(7):

Air Conditioning efficiency improvements

- Closed-loop Control
- Variable-displacement Compressor
- Internal heat exchanger
- Oil Separator

Off-cycle technologies

- Active Aerodynamic Improvements (Active Grill Shutter)
- High Efficiency Exterior lights (LED)
- Glass or Glazing
- Engine Start/Stop
- Active transmission warm-up
- Active seat ventilation

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 6MT	33.1932	[9636]
15	CROSSTREK 2.0L CVT	40.5464	[110472]
18	FORESTER 2.5L CVT	38.8154	[189898]
19	OUTBACK 2.5L CVT	38.9498	[148000]
21	OUTBACK 2.4L DI Turbo CVT	34.4887	[52000]
33	ASCENT 2.4L DI Turbo CVT	30.2760	[24805]
34	ASCENT Limited/Touring 2.4L DI Turbo CVT	29.0146	[55198]
35	CROSSTREK HYBRID	87.6974	[3600]
		Total	[593609]
		Projected Average Fuel Economy	37.1

49 CFR 537.7(b)(2): No running changes which may affect the projected average fuel economy will be performed on 2020 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: **35.4 mpg**

49 CFR 537.7(b)(4): No running changes which may affect the projected final required fuel economy will be performed on 2020 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 2020 model year for the purposes of the Act.

537.7(c)(1), (c)(3)-(c5): Please see attachment page no.'s 6-8.

537.7(c)(7):

Air Conditioning efficiency improvements

- Closed-loop Control
- Variable-displacement Compressor
- Blower motor controls
- Internal heat exchanger
- Oil Separator

Off-cycle technologies

- Active Aerodynamic Improvements (Active Grill Shutter)
- High Efficiency Exterior lights (LED)
- Glass or Glazing
- Engine Start/Stop
- Active transmission warm-up
- Active seat ventilation

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	3506	3500	2.0	113 kW @ 6,000 rpm	152 HP @ 6,000 rpm	20DNR1	DFI	TWC(2) / WR-HO2S / HO2S / DFI / EGR / EGRC	Manual-6	6	No	41.8	4.44
15	CROSSTREK 2.0L CVT	3613	3500							CVT	1		25.0	3.90
		3622	3625											
18	FORESTER 2.5L CVT	3772	3750	2.5	136 kW @5800 rpm	182HP @5800 rpm	25DNR2	DFI	TWC(2) / WR-HO2S / HO2S / DFI / EGR / EGRC	CVT	1		24.2	3.70
		3862	3875											
19	OUTBACK 2.5L CVT	4057	4000	2.5	136 kW @ 5800 rpm	182 HP @ 5800 rpm	25DNR1	DFI	TWC(2) / WR-HO2S / HO2S / DFI / EGR / EGRC	CVT	8		24.3	3.90
21	OUTBACK 2.4L DI Turbo CVT	4231	4250	2.4	194 kW @5600 rpm	260 HP @5600 rpm	24DTR1	DFI	TWC(2) / WR-HO2S / HO2S / TC / CAC / DFI / EGR / EGRC	CVT	8		23.6	4.11
33	ASCENT 2.4L DI Turbo CVT	4794	4750	2.4	194 kW @5600 rpm	260HP @5600 rpm	24DTR2	DFI	TWC(2) / WR-HO2S / HO2S / TC / CAC / DFI / EGR / EGRC	CVT	8		24.8	4.11
34	ASCENT Limited/Touring 2.4L DI Turbo CVT	4925	5000							CVT	8		24.5	
35	CROSSTREK HYBRID (Plug-In Hybrid)	4067	4000							2.0	102 kW @5600 rpm		137HP @ 5600 rpm	20DNR2

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	3117	3125	2.0	152 kW @7000 rpm	205 HP @7000 rpm	20BNP1	SFI & DFI	TWC(2) / WR-HO2S / HO2S / SFI / DFI	Manual-6	6	No	46.3	4.30
2	BRZ 2.0L 6AT	3148	3125				20BNP2			Automatic-6	6		33.5	4.10
3	IMPREZA 4-Door 2.0L 5MT	3395	3375	2.0	113 kW @ 6,000 rpm	152 HP @ 6,000 rpm	20DNR1	DFI	TWC(2) / WR-HO2S / HO2S / DFI / EGR / EGRC	Manual-5	5		42.3	4.11
4	IMPREZA 5-Door 2.0L 5MT	3406	3375							Manual-5	5		42.5	4.11
5	IMPREZA 4-Door 2.0L CVT	3406	3375							CVT	1		25.4	3.70
		3503	3500											
6	IMPREZA 5-Door 2.0L CVT	3408	3375										25.4	3.70
		3517	3500											
27	IMPREZA SPORT 5-Door 2.0L 5MT	3437	3500							Manual-5	5		41.8	4.11
28	IMPREZA SPORT 5-Door 2.0L CVT	3501	3500							CVT	7		24.9	3.70
29	IMPREZA SPORT 4-Door 2.0L 5MT	3433	3500							Manual-5	5		41.8	4.11
30	IMPREZA SPORT 4-Door 2.0L CVT	3497	3500							CVT	7		24.9	3.70
8	LEGACY 2.5L CVT	3862	3875	2.5	136 kW @ 5800 rpm	182 HP @ 5800 rpm	25DNR1	DFI	TWC(2) / WR-HO2S / HO2S / DFI / EGR / EGRC	CVT	8		24.4	3.70
13	LEGACY 2.4L DI Turbo CVT	4100	4000	2.4	194 kW @5600 rpm	260 HP @5600 rpm	24DTR1		TWC(2) / WR-HO2S / HO2S / TC / CAC / DFI / EGR / EGRC	CVT	8		23.7	3.90
24	WRX 2.0L DI Turbo 6MT	3649	3625	2.0	200 kW @ 5600 rpm	268 HP @ 5600 rpm	20DTP1	DFI	TWC(2) / WR-HO2S / HO2S / TC / CAC / DFI / EGR / EGRC	Manual-6	6		37.5	4.11
		3717	3750							Manual-6	6			
25	WRX 2.0L DI Turbo CVT	3779	3750							CVT	8		29.1	3.90
		3858	3875											
26	WRX STI 2.5L Turbo 6MT	3763	3750	2.5	231 kW @6000 rpm	310 HP @6000 rpm	25PTP1	SFI	TWC(2) / WR-HO2S / HO2S / TC / CAC / SFI / AIR	Manual-6	6		39.5	3.90
		3838	3875							Manual-6	6			
31	BRZ TS 2.0L 6MT	3142	3125	2.0	152kW @7000 rpm	205 HP @7000 rpm	20BNP1	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	CROSSTREK 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	CROSSTREK 2.0L CVT												12.6	
18	FORESTER 2.5L CVT	111.9	35.4	225/60R17	61.6	61.8	61.7	105.1	45.0			28.5	13.6	
19	OUTBACK 2.5L CVT	108.5	32.6	225/65R17	61.8	62.8	62.3	108.1	46.8			27.3	13.0	
21	OUTBACK 2.4L DI Turbo CVT	108.5	32.6	225/60R18	61.8	62.8	62.3	108.1	46.8			27.3	13.1	
33	ASCENT 2.4L DI Turbo CVT	153.5	17.8	245/60R18	64.4	64.2	64.3	113.8	50.8			31.8	15.8	
34	ASCENT Limited/Touring 2.4L DI Turbo CVT	153.5	17.8	245/50R20	64.4	64.2	64.3	113.8	50.8			31.8	16.3	
35	CROSSTREK HYBRID (Plug-In Hybrid)	100.8	16.1	225/55R18	61.2	61.6	61.4	104.9	44.7			26.6	13.6	

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 Horse 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	Sedan	205/50R17	60.6	60.8	60.7	105.1	44.3			25.1	12.3	
4	IMPREZA 5-Door 2.0L 5MT	121.7	Wagon	205/55R16								25.2	12.4	
5	IMPREZA 4-Door 2.0L CVT	112.1	Sedan	205/55R16								25.1	11.4	
6	IMPREZA 5-Door 2.0L CVT	121.7	Wagon	205/55R16								25.2	11.7	
27	IMPREZA SPORT 5-Door 2.0L 5MT	121.7	Wagon	225/40R18								25.2	13.1	
28	IMPREZA SPORT 5-Door 2.0L CVT	121.7	Wagon	225/40R18								12.3		
29	IMPREZA SPORT 4-Door 2.0L 5MT	112.1	Sedan	225/40R18								25.1	12.6	
30	IMPREZA SPORT 4-Door 2.0L CVT	112.1	Sedan	225/40R18										
8	LEGACY 2.5L CVT	120.3	Sedan	225/55R17	62.2	63.4	62.8	108.3	47.2			25.6	11.7	
13	LEGACY 2.4L DI Turbo CVT	120.3	Sedan	225/50R18	62.2	63.4	62.8	108.3	47.2			11.5		
24	WRX 2.0L DI Turbo 6MT	108.9	Sedan	235/45R17	60.2	60.6	60.4	104.3	43.7			25.7	14.0	
25	WRX 2.0L DI Turbo CVT	108.9	Sedan	245/40R18										
26	WRX STI 2.5L Turbo 6MT	108.9	Sedan	245/35R19						15.8				
31	BRZ IS 2.0L 6MT	83.4	2D Coupe	215/40R18						59.8	60.6			60.2

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
18	FORESTER 2.5L CVT	AWD-CVT	22.9	19.6	24.6	8.7	8.5	10.3
19	OUTBACK 2.5L CVT	AWD-CVT	18.4	19.4	20.3	8.7	10.3	11.2
21	OUTBACK 2.4L DI Turbo CVT	AWD-CVT	18.4	19.4	20.3	8.7	10.6	11.0
33	ASCENT 2.4L DI Turbo CVT	AWD-CVT	17.6	18.2	21.8	8.7	8.3	8.2
34	ASCENT Limited/Touring 2.4L DI Turbo CVT	AWD-CVT	17.6	18.2	21.8	8.7	8.3	8.2
35	CROSSTREK HYBRID (Plug-In Hybrid)	AWD-CVT	17.1	19.3	28.6	8.7	9.5	10.4

2020MY SUBARU Passenger Automobiles CAFE Standard -November 23, 2019

Model year dependent parameters used to calculate

<u>MFR</u>	<u>Model Year</u>	<u>Compliance Category</u>	<u>MFR Final Reformed CAFE Standard (mpg)</u>	<u>Unrounded Reformed CAFE Standard Discrepancy Value (mpg)</u>	<u>Mfr Calculated Reformed CAFE Standard (4 decimal places) (mpg)</u>	<u>a</u>	<u>b</u>	<u>c</u>	<u>d</u>	<u>Total Production</u>
SUBARU	2020	Import Passenger Car	44.9	0	44.8593	48.74	36.47	0.0004603	0.001643	157859

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	2400	47.36
2	FJX	1	10	LDV	Import	BRZ	2	17	S6	2.0L NA model	101.2	59.8	60.6	60.2	42.3	1140	47.36
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	888	45.38
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	16140	45.38
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	2016	45.38
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	39624	45.38
29	FJX	1	50	LDV	Import	MPREZA SPORT 4Door	3	78	M5	2.0L NA model	105.1	60.6	60.8	60.7	44.3	1044	45.38
30	FJX	1	50	LDV	Import	MPREZA SPORT 4Door	3	79	CVT	2.0L NA model	105.1	60.6	60.8	60.7	44.3	6888	45.38
27	FJX	1	85	LDV	Import	MPREZA SPORT 5Door	3	78	M5	2.0L NA model	105.1	60.6	60.8	60.7	44.3	1716	45.38
28	FJX	1	85	LDV	Import	MPREZA SPORT 5Door	3	79	CVT	2.0L NA model	105.1	60.6	60.8	60.7	44.3	11772	45.38
8	FJX	1	65	LDV	Import	LEGACY	4	75	CVT	2.5L NA model	108.3	62.2	63.4	62.8	47.2	36600	42.79
13	FJX	1	65	LDV	Import	LEGACY	5	27	CVT	2.4L Turbo model	108.3	62.2	63.4	62.8	47.2	3400	42.79
24	FJX	1	25	LDV	Import	WRX	6	72	M6	2.0L Turbo model	104.3	60.2	60.6	60.4	43.7	19644	45.96
25	FJX	1	25	LDV	Import	WRX	6	26	CVT	2.0L Turbo model	104.3	60.2	60.6	60.4	43.7	4286	45.96
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	10001	45.96
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	300	47.36

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

Model year dependent parameters used to calculate

<u>MFR</u>	<u>Model Year</u>	<u>Compliance Category</u>	<u>MFR Final Reformed CAFE Standard (mpg)</u>	<u>Unrounded Reformed CAFE Standard Discrepancy Value (mpg)</u>	<u>Mfr Calculated Reformed CAFE Standard (4 decimal places) (mpg)</u>	<u>a</u>	<u>b</u>	<u>c</u>	<u>d</u>	<u>e</u>	<u>f</u>	<u>g</u>	<u>h</u>	<u>Total Production</u>
SUBARU	2020	Light Duty Truck	35.4	0	35.355	39.11	25.25	0.000514	0.004494	35.41	25.25	0.0004546	0.009603	593609

The required fuel economy level (Domestic) = Not applicable

Footprint informations for calculating the required fuel economy (Import)

<u>Model Type Index</u>	<u>Carline MFR Code</u>	<u>Division Code</u>	<u>Carline code</u>	<u>Vehicle Class [GHG]</u>	<u>Carline Name</u>	<u>Basic Engine Index</u>	<u>Verify Transmission Configuration Code</u>	<u>Transmission Class Name</u>	<u>Model Type Footprint Description</u>	<u>Wheel base (inches)</u>	<u>Front Track Width (inches)</u>	<u>Rear Track Width (inches)</u>	<u>Avg Track Width (inches)</u>	<u>Footprint (square feet)</u>	<u>Footprint Final Model Year Production Units</u>	<u>MFR Footprint Target FE Value (mpg rounded to two decimal places)</u>
14	FJX	1	35	LDT	CROSSTREK	1	7	M6	2.0L NA model	104.9	61.0	61.2	61.1	44.5	9636	36.54
15	FJX	1	35	LDT	CROSSTREK	1	23	CVT	2.0L NA model	104.9	61.0	61.2	61.1	44.5	110472	36.54
18	FJX	1	95	LDT	FORESTER	2	24	CVT	2.5L NA model	105.1	61.6	61.8	61.7	45.0	189898	36.20
19	FJX	1	70	LDT	OUTBACK	2	76	CVT	2.5L NA model	108.1	61.8	62.8	62.3	46.8	148000	35.03
21	FJX	1	70	LDT	OUTBACK	3	74	CVT	2.4L Turbo model	108.1	61.8	62.8	62.3	46.8	52000	35.03
33	FJX	1	100	LDT	ASCENT	4	83	CVT	2.4L Turbo model	113.8	64.4	64.2	64.3	50.8	24805	32.67
34	FJX	1	105	LDT	ASCENT Limited/Touring	4	83	CVT	2.4L Turbo model	113.8	64.4	64.2	64.3	50.8	55198	32.67
35	FJX	1	41	LDT	CROSSTREK HYBR D	5	84	CVT	2.0L PHEV	104.9	61.2	61.6	61.4	44.7	3600	36.40

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

(1)Light Truck (LT)

BUSINESS INFORMATION CONTAINED IS OUTLINED

Model type code	Model Type	Model Type City FE	Model Type Hwy FE	Model Type Comb FE	Projected Sales
14	CROSSTREK 2.0L 6MT	28.6000	41.3000	33.1932	9636
15	CROSSTREK 2.0L CVT	35.8900	48.1877	40.5464	110472
18	FORESTER 2.5L CVT	33.9052	47.1637	38.8154	189898
19	OUTBACK 2.5L CVT	33.8826	47.6617	38.9498	148000
21	OUTBACK 2.4L DI Turbo CVT	29.8000	42.7000	34.4887	52000
33	ASCENT 2.4L DI Turbo CVT	26.0425	37.7830	30.2760	24805
34	ASCENT Limited/Touring 2.4L DI Turbo CVT	25.0000	36.1000	29.0146	55198
35	CROSSTREK HYBRID 2.0L CVT	90.0935	84.9365	87.6974	3600

Category	Projected Sales	Unrounded Unadjusted	-	CAFE (mpg)	CAFE Standard (mpg)	Credit/Debit
LT	593609	37.1303	-	37.1	35.4	10,328,797

(2)Passenger Automobile (PA) Import & Domestic

Model type code	Model Type	Model Type City FE	Model Type Hwy FE	Model Type Comb FE	Projected Sales
1	BRZ 2.0L 6MT	26.5601	40.6069	31.4568	2400
2	BRZ 2.0L 6AT	31.3000	47.3000	36.9200	1140
3	IMPREZA 4-Door 2.0L 5MT	29.8000	44.9000	35.1140	888
4	IMPREZA 5-Door 2.0L 5MT	30.3000	44.4000	35.3520	2016
5	IMPREZA 4-Door 2.0L CVT	37.0911	52.9697	42.8747	16140
6	IMPREZA 5-Door 2.0L CVT	36.2808	51.8636	41.9531	39624
8	LEGACY 2.5L CVT	35.0207	51.2410	40.8380	36600
13	LEGACY 2.4L DI Turbo CVT	30.4000	46.7000	36.0645	3400
24	WRX 2.0L DI Turbo 6MT	26.0562	38.7385	30.5581	19644
25	WRX 2.0L DI Turbo CVT	22.9000	34.0000	26.8436	4286
26	WRX STI 2.5L Turbo 6MT	20.5731	30.6190	24.1367	10001
27	IMPREZA SPORT 5-Door 2.0L 5MT	28.6000	42.9000	33.6471	1716
28	IMPREZA SPORT 5-Door 2.0L CVT	35.5000	51.1000	41.1536	11772
29	IMPREZA SPORT 4-Door 2.0L 5MT	30.0000	44.2000	35.0701	1044
30	IMPREZA SPORT 4-Door 2.0L CVT	35.4000	52.3000	41.4234	6888
31	BRZ tS 2.0L 6MT	25.7000	38.8000	30.3042	300

Category	Projected Sales	Unrounded Unadjusted CAFE(mpg)	Unrounded Adjusted CAFE(mpg)	CAFE (mpg)	CAFE Standard (mpg)	Credit/Debit	2020MY Minimum standard (mpg)
PA Import	157859	37.0569	37.3197	37.3	44.9	-11,934,140	-
PA Domestic	0	#VALUE!	0.0000	0.0	---	#VALUE!	40.9