

March 18, 2010

BY HAND DELIVERY

Mr. O. Kevin Vincent
Chief Counsel
National Highway Traffic Safety Administration
1200 New Jersey Avenue, SE, Room W41-227
Washington, DC 20590

Re: Safety Recall 10V-017/TQ10-002

Dear Mr. Vincent:

Today, Toyota Motor North America (“Toyota”) is submitting its response to the Information Requests in the above-referenced matter, as well as its response to the Information Request issued in connection with Safety Recalls 07E-082, 09V-388, and 10V-023/TQ10-001. Because Toyota had only 30 days to collect documents, determine whether they are responsive to the questions in the Information Requests, and submit the voluminous number of documents that were deemed responsive, Toyota has been unable to complete a separate review of the documents for confidential business information and to prepare the request for confidential treatment pursuant to Part 512 of the agency’s regulations (49 C.F.R. § 512) and Exemption 4 of the Freedom of Information Act (5 U.S.C. § 552(b)(4)). Accordingly, pursuant to 49 C.F.R. § 512.11, Toyota is requesting a seven-day extension of time, up to and including March 25, 2010, to submit a request for confidential treatment of the confidential business information in today’s submissions.

As noted above, the submissions that Toyota is making today are quite voluminous. In the 30-day period provided for by the Information Requests, Toyota had to devote the full time of the numerous personnel who are staffing the collection and submission effort to the tasks of collecting and reviewing the documents for responsiveness and preparing the substantive responses to the Information Requests. This has prevented Toyota from reviewing the information in order to prepare a request for confidential treatment.

In lieu of such a confidentiality review, Toyota determined that information responsive to certain of the questions in the Information Requests is unlikely to contain confidential business information and, therefore, has not marked the documents responsive to such questions as confidential. When Toyota submits its request for confidential treatment, Toyota will not seek confidential treatment for such documents, and, therefore, Toyota does not object to their immediate disclosure to the public, although Toyota notes that some of the unmarked documents contain personal identifying information that NHTSA may be under an obligation to withhold from public disclosure under the Privacy Act (5 U.S.C. § 552a) and Exemption 6 of the Freedom of Information Act (5 U.S.C. § 552(b)(6)).

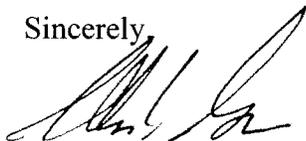
Mr. O. Kevin Vincent
March 18, 2010
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The subject matter of the responses to other questions in the Information Requests, however, clearly implicates Toyota's confidential business information, including design information, design change information, proprietary testing procedures and related information, and proprietary product assessment and remediation process information. Because, as noted above, the compressed time frame for submitting the responses to the Information Requests did not afford Toyota time to conduct a separate confidentiality review of the numerous documents being submitted today, Toyota has labeled *all* of the documents that are responsive to such questions to indicate that they contain confidential business information. When Toyota submits its request for confidential treatment within seven days, Toyota will likely withdraw claims for confidential treatment of some of the documents that are now labeled as containing confidential business information.

Because most of the documents are being produced electronically out of Ringtail® Legal™ software, and the production printer within that software facilitates the insertion of footers, but not headers, the confidential business information legend had to be put on the *bottom* of the page, rather than at the top.

Toyota recognizes that the agency's priority is the timely receipt of the information called for by the Information Requests. Toyota's obligation to respond to the Information Requests within the stated time frames for doing so has made it impossible for Toyota to submit a request for confidential treatment contemporaneously with today's submissions. In view of these facts, this modest request for an extension of time pursuant to 49 C.F.R. § 512.11 is reasonable. Toyota, therefore, respectfully requests that it be granted a seven-day extension of time, up to and including March 25, 2010, to submit a request for confidential treatment for the submissions being made today.

Sincerely,

A handwritten signature in black ink, appearing to read 'Adam C. Sloane', written in a cursive style.

Adam C. Sloane

Enclosures

TOYOTA

TOYOTA MOTOR NORTH AMERICA, INC.

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March 18, 2010

Ms. Kathleen C. DeMeter
Director, Office of Defects Investigation
Enforcement
National Highway Traffic Safety Administration
1200 New Jersey Avenue, SE
Washington, DC 20590

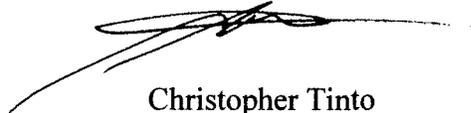
Re: Safety Recall 10V-017/TQ10-002

Dear Ms. DeMeter:

On behalf of Toyota Motor Corporation (TMC) and its subsidiaries and affiliates (collectively referred to as Toyota), Toyota Motor North America, Inc. (TMA), is transmitting the enclosed response to the Information Request (IR) issued by the Office of Defects Investigation (ODI) on February 16, 2010 in timeliness query TQ10-002.

If you have any questions with respect to any portion of this response, please do not hesitate to contact me, and I will direct your inquiry to the appropriate Toyota entity.

Sincerely,



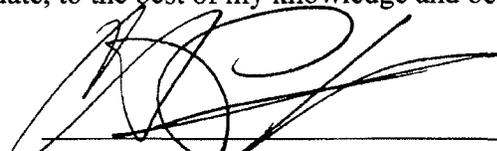
Christopher Tinto
Group Vice President
Technical and Regulatory Affairs

cc: O. Kevin Vincent, Esq., Chief Counsel
Jennifer Timian, Recall Management Division, ODI

Enclosures

VERIFICATION

I am Christopher Reynolds, General Counsel of Toyota Motor Sales, Inc. (TMS). In connection with the Information Request sent by the National Highway Traffic Safety Administration to Toyota Motor North America, Inc., on February 16, 2010 in TQ10-002, I have caused a search to be made of the records of TMS that are most likely to have responsive documents and other materials. I hereby verify that I have provided all responsive materials in the custody of TMS that have been identified to date, to the best of my knowledge and belief.



Christopher Reynolds

March 18, 2010

VERIFICATION

I am Shinji Miyamoto, General Manager of the Customer Quality Engineering Division of Toyota Motor Corporation (TMC). In connection with the Information Request sent by the National Highway Traffic Safety Administration to Toyota Motor North America, Inc., on February 16, 2010 in TQ10-002, I have caused a search to be made of the records of TMC that are most likely to have responsive documents and other materials. I hereby verify that I have provided all responsive materials in the custody of TMC that have been identified to date, to the best of my knowledge and belief.



Shinji Miyamoto

March 18, 2010

TOYOTA'S RESPONSE TO ODI'S INFORMATION REQUEST IN TQ10-002

INTRODUCTION

In the short period of time provided to respond to this IR, as well as to respond to a separate, extensive IR in TQ10-001, Toyota has reviewed a substantial number of files, and it is producing today numerous files and over thirty thousand pages of documents. A large number of Toyota employees and contractors, both in the United States and Japan, have devoted substantial hours to search the company's records that are most likely to have responsive materials, to review those materials, and to produce copies. Given the time constraints, Toyota is still in the process of reviewing files in an effort to identify responsive materials. Toyota will supplement this response as additional responsive materials are identified.

In addition, Toyota has identified several Excel documents that appear to include some responsive information, but which are otherwise extremely long and voluminous and contain some unresponsive information. When printed in their entirety, some of these documents would be thousands of pages. Under the circumstances, and given the time constraints, Toyota is producing today images of those Excel files that are less than 250 pages. It will produce the larger files in a supplement to this response as soon as practicable.

Toyota has marked each document produced today – other than those produced in response to Requests 1-11 – “confidential,” in order to preserve the confidentiality of proprietary documents pending the completion of its review to identify which documents are entitled to confidential protection under 49 CFR Part 512. Toyota will submit the required Part 512 justification and certificate, along with appropriately redacted public versions of the documents, within the next seven days.

To the extent reasonably practical under the circumstances, information and documents provided in this response are current as of the date of the IR (February 16, 2010).

The responses do not yet include data or information with respect to the Pontiac Vibe vehicles manufactured by NUMMI that are included within the definition of “subject vehicles.” That information is in the possession of General Motors (GM). Toyota has requested GM to provide all information regarding the Vibe that is responsive to any of the Requests in this IR, and it expects to receive that information in the near future. As soon as Toyota receives such information from GM, it will provide it to ODI.

REQUEST

1. State, by make, model and model year, the number of Subject Vehicles Toyota has manufactured for sale or lease in the United States. Also, separately, for each Subject Vehicle manufactured for sale or lease in the United States to date by Toyota, state the following:
 - a. Vehicle identification number (VIN);
 - b. The manufacturer and part number of the accelerator pedal assembly installed on the vehicle;
 - c. Whether the vehicle was equipped with smart pedal or similar system;
 - d. Date of manufacture (in “dd/mm/yyyy” date format);
 - e. Date warranty coverage commenced; and
 - f. The State in the United States where the vehicle was originally sold or leased (or delivered for sale or lease).

Provide the table in Microsoft Access 2003, or a compatible format, entitled “US PRODUCTION DATA.” Provide a separate table for each Model Year.

ANSWER

1. The number of subject vehicles manufactured for sale or lease in the United States by make, model, and model year is included in the information provided as “Attachment-Response 1.”

The detailed information responsive to subrequests “a” through “g” is provided electronically in the folder “Attachment-Response 1.”

REQUEST

2. State, by make, model and model year, the number of vehicles that are identical or substantially similar to any of the Subject Vehicles, as defined in 49 CFR § 579.4(d), and Toyota has manufactured for sale or lease outside of the United States. Also, separately, for each such vehicle, state the following:
 - a. The manufacturer and part number of the accelerator pedal assembly installed on the vehicle;
 - b. Whether the vehicle was equipped with smart pedal or similar system;

- c. Date of manufacture (in “dd/mm/yyyy” date format); and
- d. The country where the vehicle was originally sold or leased (or delivered for sale or lease).

Provide the table in Microsoft Access 2003, or a compatible format, entitled “FOREIGN PRODUCTION DATA.” Provide a separate table for each Model Year.

ANSWER

2. The number of vehicles that are identical or substantially similar to any of the subject vehicles manufactured for sale or lease outside of the United States by make, model, and model year is included in the information provided in “Attachment-Response 2.”

The detailed information responsive to subrequests “a” through “d” is provided electronically in the folder “Attachment-Response 2.”

The number of the vehicles that are identical or substantially similar to any of the subject vehicles for sale or lease outside of the United States by make , model and model year is included in the information provided as “Attachment-Response 2.”

In addition, the detailed information responsive to “a” through “d” is provided electronically in the folder “Attachment-Response 2.”

REQUEST

- 3. Separately, by make, model, model year of Subject Vehicle, state the number of each of the following received by Toyota, or of which Toyota is otherwise aware, which relate to or may relate to a sticking accelerator pedal in the Subject Vehicle(s) manufactured for sale or lease in the United States.
 - a. Consumer complaints, including those from fleet operators;
 - b. Field reports, including field technical reports and dealer field reports;
 - c. Reports involving a crash/fire, injury, or fatality based on claims against the manufacturer involving a death or injury; notices received by the manufacturer alleging or proving that a death or injury was caused by a possible defect in a Subject Vehicle;
 - d. Property damage claims (including to own vehicle);

- e. Third-party arbitration proceedings where Toyota is or was a party to the arbitration; and
- f. Lawsuits, both pending and closed, in which Toyota is or was a defendant or codefendant.

The scope of this information request includes allegations and observations of an accelerator pedal becoming harder to depress, slower to return (or an allegation of slow return to idle), or stuck in a partially depressed position, including but not limited to allegations such as an accelerator pedal stuck and engine racing; the pedal sticking and the engine revving up; the vehicle accelerating in an uncontrolled manner, with the driver having to lift the throttle pedal with the driver's foot due to it sticking down while driving; the engine speed stayed high causing uncontrolled acceleration after the accelerator pedal was released; while driving the engine RPM remained high after releasing the accelerator pedal; and similar allegations by the owner of a Subject Vehicle, driver or passenger of the Subject Vehicle, person in a vehicle that was in a crash with a Subject Vehicle, or other person who was hit by a Subject Vehicle (e.g., a pedestrian), including the attorney or representative of such person, or in a field technical report.

For subparts "a" through "d", state the total number of each item (e.g., consumer complaints, field reports, etc.) separately. Multiple incidents involving the same vehicle are to be counted separately. Multiple reports of the same incident are also to be counted separately (i.e., a consumer complaint and a field report involving the same incident in which a crash occurred are to be counted as a crash report, a field report, and a consumer complaint).

In addition, for subparts "c" through "f", provide a summary description of the alleged problem and causal and contributing factors and Toyota's assessment of the problem, with a summary of the significant underlying facts and evidence. For items "e" and "f", identify the parties to the action as well as the caption, court, docket number, and date on which the complaint or other document initiating the action was filed.

Provide the table in a Microsoft Excel 2003 (or a compatible format) file titled "MANUFACTURER REPORT COUNT—US."

ANSWER

3. Using the methodology described in Request 3, the number of reports that relate to, or may relate to, a sticking accelerator pedal in the subject vehicles manufactured for sale or lease in the

United States that have been located to date are provided electronically in the folder "Attachment- Response 3."

REQUEST

4. Separately, by make, model, model year of Subject Vehicle, and country where the subject vehicle was originally sold or leased (or otherwise transferred as a new vehicle from Toyota to a third party), state the number of each of the following received by Toyota, or of which Toyota is otherwise aware, which relate to or may relate to a sticking accelerator pedal in the Subject Vehicle(s) manufactured for sale or lease outside of the United States:
 - a. Consumer complaints, including those from fleet operators;
 - b. Field reports, including dealer field reports;
 - c. Reports involving a crash/fire, injury, or fatality based on claims against the manufacturer involving a death or injury; notices received by the manufacturer alleging or proving that a death or injury was caused by a possible defect in a Subject Vehicle;
 - d. Property damage claims (including to own vehicle);
 - e. Third-party arbitration proceedings where Toyota is or was a party to the arbitration; and
 - f. Lawsuits, both pending and closed, in which Toyota is or was a defendant or codefendant.

The scope of this information request includes allegations and observations of an accelerator pedal becoming harder to depress, slower to return (or an allegation of slow return to idle), or stuck in a partially depressed position, including allegations such as an accelerator pedal stuck and engine racing; the pedal sticking and the engine revving up; the vehicle accelerating in an uncontrolled manner, with the driver having to lift the throttle pedal with the driver's foot due to it sticking down while driving; the engine speed stayed high causing un-controlled acceleration after the accelerator pedal was released; while driving the engine RPM remained high after releasing the accelerator pedal; and similar allegations by the owner of a Subject Vehicle, driver or passenger of the Subject Vehicle, person in a vehicle that was in a crash with a Subject Vehicle, or other person who was hit by a Subject Vehicle (e.g., a pedestrian) including the attorney or representative of such person, or in a field technical report.

For subparts “a” through “d”, state the total number of each item (e.g., consumer complaints, field reports, etc.) separately. Multiple incidents involving the same vehicle are to be counted separately. Multiple reports of the same incident are also to be counted separately (i.e., a consumer complaint and a field report involving the same incident in which a crash occurred are to be counted as a crash report, a field report, and a consumer complaint).

In addition, for subparts “c” through “f”, provide a summary description of the alleged problem and causal and contributing factors and Toyota’s assessment of the problem, with a summary of the significant underlying facts and evidence. For items “e” and “f”, identify the parties to the action as well as the caption, court, docket number, and date on which the complaint or other document initiating the action was filed.

Provide the table in a Microsoft Excel 2003 (or a compatible format) file titled “MANUFACTURER REPORT COUNT—OUTSIDE US.”

ANSWER

4. Using the methodology described in Request 4, the number of reports which relate to, or may relate to, a sticking accelerator pedal in the subject vehicles manufactured for sale or lease outside of the United States that have been located to date are provided electronically in the folder “Attachment- Response 4.”

Please note that Toyota has generally not included personal identifying information for individuals who are located outside North America, pending review of foreign privacy protection laws in the relevant foreign countries.

REQUEST

5. Separately, for each item (complaint, report, claim, notice, proceeding or lawsuit) within the scope of your responses to Information Requests 3 or 4, state the following information:
 - a. Toyota’s file number or other identifier used;
 - b. The category of the item, as identified in Information Request 2 or 3 (i.e., consumer complaint, field report, etc.);
 - c. Vehicle owner or fleet name (and fleet contact person), address, and telephone number;

- d. Vehicle's make, model and model year;
- e. Vehicle's VIN;
- f. The name of the manufacturer, the Toyota part number, supplier, and supplier's part number of the accelerator pedal installed on the vehicle;
- g. Whether the vehicle was equipped with a smart pedal or similar system;
- h. Vehicle's mileage at time of incident;
- i. Incident date (in "dd/mm/yyyy" date format);
- j. Report or claim date (in "dd/mm/yyyy" date format);
- k. Whether a crash is alleged;
- l. Whether property damage is alleged;
- m. Number of alleged injuries, if any;
- n. Number of alleged fatalities, if any; and
- o. How Toyota characterized the complaint, report etc (e.g., safety-related concern, driveability issue, customer satisfaction issue)

Provide this information in a Microsoft Access 2003 (or a compatible format) file titled "REQUEST NUMBERTHREE/FOUR DATA."

ANSWER

- 5. The information "a" through "o" for each item (complaint, report, claim, notice, or matter) is provided electronically in the folder "Attachment-Response 5."

REQUEST

- 6. Produce copies of all documents related to each item within the scope of Information Request Nos. 3 and/or 4. Organize the documents separately by request (3 or 4), category (i.e., consumer complaints, field reports, etc.) and in chronological order.

ANSWER

6. Copies of responsive documents that have been located to date are provided electronically in the folder "Attachment-Response 6."¹ Other documents responsive to this request may be contained in documents obtained from the ongoing review of Toyota's files and records, and, if so, they would be included in the response to Request 42. If Toyota identifies additional relevant documents, it will supplement this response. In the category of lawsuits, documents from the U.S. lawsuit files have been produced, including an index to all documents produced in response to discovery requests. Documents from foreign lawsuits are being produced, and may be supplemented if additional documents are located.

REQUEST

7. a. Produce a copy of each notice, bulletin, and other communication (including those transmitted by electronic means and including warranty and policy extension communiqués and product improvement bulletins) sent by Toyota to a unit of Toyota outside of the United States, a manufacturer, or to more than one distributor, dealer, owner, purchaser, lessor or lessee outside of the United States regarding accelerator pedal(s) in Subject Vehicle(s) (other than those issued on Recalls 07E-082, 09V-388 and 10V-023).
- b. Produce a copy of each communication relating to a customer satisfaction campaign, consumer advisory, recall, or other safety activity regarding accelerator pedal(s) in Subject Vehicles that Toyota issued to, or made available to, more than one dealer, distributor, lessor, lessee, other manufacturer, owner, or purchaser outside of the United States (other than those issued on Recalls 07E-082, 09V-388 and 10V-023).

ANSWER

7. Toyota is still in the process of reviewing its files for information responsive to this Request, and the response is based on the materials reviewed to date. Toyota has located five technical information bulletins regarding accelerator pedal(s) in the subject vehicles. Copies of the items that have been located to date are provided electronically in the folder "Attachment-Response 7."

¹ Toyota has not yet identified or provided attachments (if any) that may have been submitted by consumers who complained to Toyota about the alleged defect via e-mail or letter. The company will provide a complete set of such attachments – referenced to the particular complaint at issue – as soon as they are compiled.

Other information responsive to this request may be contained in documents obtained from the ongoing review of Toyota's files and records, and, if so, it would be included in the response to Request 42. If Toyota identifies additional relevant information, it will supplement this response.

REQUEST

8. State by make, model and model year, a total count for all of the following categories of claims, collectively, that have been paid by Toyota to date, that relate to or may relate to a sticking accelerator pedal in Subject Vehicle(s) in the United States: warranty claims; extended warranty claims; claims for good will services that were provided; field, zone, or similar adjustments and reimbursements; and warranty claims or repairs made in accordance with a procedure specified in a technical service bulletin or customer satisfaction campaign. (This does not include claims for implementation of recall(s) related to the accelerator pedal that followed Toyota's filing of a 49 CFR 573.6 report with NHTSA for a Subject Vehicle.)

Separately, for each such claim, state the following information:

- a. Toyota's claim number;
- b. Vehicle owner or fleet name (and fleet contact person) and telephone number;
- c. VIN;
- d. A description of any part (including an accelerator pedal) removed, including the Toyota part number if available;
- e. A description of any part (including an accelerator pedal) installed, including the Toyota part number if available;
- f. The manufacturer and Toyota part number and supplier of the accelerator pedal installed on the vehicle;
- g. Whether the vehicle was equipped with smart pedal or similar system;
- h. Repair/service date (in "dd/mm/yyyy" date format);
- i. Vehicle mileage at time of repair;
- j. Repairing/servicing dealer's or facility's name, telephone number, city and state or ZIP code;
- k. Labor operation number;

- l. Problem code;
- m. Concern stated by customer; and
- n. Comment, if any, by dealer/technician relating to claim, repair and/or service.

Provide the summary warranty data table electronically in a Microsoft Excel 2003 (or a compatible format) file titled "WARRANTY DATA SUMMARY—U.S." Provide the warranty data in a Microsoft Access 2003 (or a compatible format) file titled "WARRANTY DATA—U.S."

ANSWER

8. The count of warranty claims paid by Toyota for the subject vehicles in the United States, that relate to or may relate to a sticking accelerator pedal in the subject vehicles is provided electronically in the folder "Attachment-Response 8." The detailed information for each claim is also provided electronically in the folder "Attachment- Response 8."

Toyota is still in the process of identifying responsive information with respect to claims paid under extended warranty programs. As Toyota identifies additional relevant information, it will supplement this response.

REQUEST

9. Describe in detail the search criteria used by Toyota to identify the claims identified in response to the immediately above information request, including the labor operations, problem codes, part numbers, and any other pertinent parameters used. Provide a list of all labor operations, labor operation descriptions, problem codes, and problem code descriptions applicable to any aspect of the sticking accelerator pedal in the Subject Vehicle(s). State, by make and model year, the terms of the new vehicle warranty coverage (including the component) offered by Toyota on the Subject Vehicle(s) (i.e., the number of months and mileage for which coverage is provided and the vehicle systems that are covered). Describe any extended warranty coverage option(s) that Toyota offered for the Subject Vehicle(s) and state by option, model, and model year, the number of vehicles that are covered under each such extended warranty.

ANSWER

9. In preparing for its response to Request 8, Toyota assembled a list of all the parts numbers it could identify for the CTS pedal assembly involved in the corresponding safety recall campaign. Toyota searched the relevant warranty claims systems in the United States for all warranty repairs in which such part numbers were listed as either one of the parts removed or one of the parts installed in a subject vehicle. Toyota currently believes, based upon its research conducted to date, that no other Toyota vehicles contain a friction lever made in whole or in part of PPS or PA46 material. All records of warranty repairs meeting the preceding criteria have been produced, including many for which no complaint of “sticking accelerator pedal” was made by the customer.

Some records relating to the implementation of the recall may have been included. Toyota is reviewing the data and if so, those records will be identified as soon as possible and removed. Toyota’s warranty system follows primarily a parts-based, rather than a labor-code based, approach.

A list of part numbers used in the search described above is produced as an attachment to this letter.

Although Toyota did not use labor operations codes or problem codes for this search, Toyota is in the process of preparing a list of labor operation codes and problem codes that are typically associated with unwanted acceleration-related warranty claims, and will supplement this response with that list.

The terms that Toyota offers for new vehicle warranty coverage on the subject vehicles are as follows:

For the subject components (i.e. accelerator pedal)

Toyota: 36 months or 36,000 miles from the vehicle’s date-of-first-use, whichever occurs first.

Lexus: 48 months or 50,000 miles from the vehicle’s date-of-first-use, whichever occurs first.

There are some extended warranty coverage options that Toyota offered for purchase with the subject vehicles in the United States. Detailed information about these options is provided electronically in the folder “Attachment-Response 9.” However, as noted in the response to Request 8, Toyota is still in the process of identifying all responsive information with respect to the number of vehicles that are covered under each such extended warranty option offered by Toyota. As Toyota identifies additional relevant information, it will supplement this response.

REQUEST

10. State by make, model and model year, a total count for all of the following categories of claims, collectively, that have been paid by Toyota to date that relate to or may relate to a sticking accelerator pedal in Subject Vehicle(s) outside of the United States: warranty claims; extended warranty claims; claims for good will services that were provided; field, zone, or similar adjustments and reimbursements; and warranty claims or repairs made in accordance with a procedure specified in a technical service bulletin or customer satisfaction campaign.

Separately, for each such claim, state the following information:

- a. Toyota's claim number;
- b. Vehicle owner or fleet name (and fleet contact person) and telephone number;
- c. VIN;
- d. Country where the service or repair took place;
- e. A description of any part (including an accelerator pedal) removed, including the Toyota part number if available;
- f. A description of any part (including an accelerator pedal) installed, including the Toyota part number if available;
- g. The manufacturer and Toyota part number and supplier of the accelerator pedal installed on the vehicle;
- h. Whether the vehicle was equipped with smart pedal or similar system;
- i. Repair/service date (in "dd/mm/yyyy" date format);
- j. Vehicle mileage at time of repair;
- k. Repairing/servicing dealer's or facility's name, telephone number, city, province, and/or other political subdivision;
- l. Labor operation number;
- m. Problem code;
- n. Concern stated by customer; and
- o. Comment, if any, by dealer/technician relating to claim, repair and/or service.

Provide the summary warranty data table electronically in a Microsoft Excel 2003 (or a compatible format) file titled "WARRANTY DATA SUMMARY— FOREIGN".

Provide the warranty data in a Microsoft Access 2003 (or a compatible format) file titled "WARRANTY DATA— FOREIGN."

ANSWER

10. The count of warranty claims paid by Toyota for the subject vehicles outside of the United States that relate to or may relate to a sticking accelerator pedal in the subject vehicles is provided electronically in the folder "Attachment-Response 10."

The detailed information for each such claim is also provided electronically in the folder "Attachment- Response 10."

Based on its research to date, Toyota believes that it does not offer extended warranty claims outside the United States. If Toyota becomes aware of any additional relevant information, it will supplement this response.

REQUEST

11. Describe in detail the search criteria used by Toyota to identify the claims identified in response to the immediately above information request, including the labor operations, problem codes, part numbers, and any other pertinent parameters used. Provide a list of all labor operations, labor operation descriptions, problem codes, and problem code descriptions applicable to any aspect of the sticking accelerator pedal in the Subject Vehicle(s). State, by make and model year, the terms of the new vehicle warranty coverage (including the component) offered by Toyota on the Subject Vehicle(s) (i.e., the number of months and mileage for which coverage is provided and the vehicle systems that are covered). Describe any extended warranty coverage option(s) that Toyota offered for the Subject Vehicle(s) and state by option, model, and model year, the number of vehicles that are covered under each such extended warranty.

ANSWER

11. For its response to Request 10, Toyota assembled a worldwide list of all the parts numbers it could identify for the accelerator pedal assembly that relate to or may relate to a sticking accelerator pedal in a subject vehicles outside of the United States. Toyota searched the relevant warranty system at TMC Japan, for all non-U.S. markets, for all warranty repairs in which such

part numbers were listed as either one of the parts removed or one of the parts installed in a subject vehicle or a vehicle identified by Toyota as “identical or substantially similar.” Toyota currently believes, based upon all research conducted to date, that no other Toyota vehicles contain a friction lever made in whole or in part of PPS or PA46 material. All records of warranty repairs meeting the preceding criteria have been produced, including many for which no complaint of “sticky pedal” was made by the customer. Toyota does not offer extended warranty products outside of the U.S. Toyota’s system follows primarily a parts-based, rather than a labor-code based, approach.

A list of part numbers used in the search described above is enclosed. Toyota will supplement this response with information about labor operation codes and problem codes as described in response to Request 9.

The terms that Toyota offers for new vehicle warranty coverage on the subject vehicles are as follows:

For the subject components (i.e., the accelerator pedal)

Toyota: 36 months or 36,000 miles from the vehicle’s date-of-first-use, whichever occurs first.

Lexus: 48 months or 50,000 miles from the vehicle’s date-of-first-use, whichever occurs first.

Based on its research to date, Toyota believes that it does not offer extended warranty claims outside the United States. If Toyota becomes aware of any additional relevant information, it will supplement this response.

REQUEST

12. State when Toyota first became aware of allegations of sticking accelerator pedals for each make, model and model year Subject Vehicle, (a) within and (b) outside of the United States. Explain in detail how Toyota became aware of the issue, e.g., whether the issue was discovered during the design or production phase of a vehicle, whether Toyota was first informed by a customer complaint, etc.

ANSWER

12. Toyota is still in the process of reviewing potentially responsive material. Toyota will provide information in response to this request in a supplemental response.

REQUEST

13. Describe in detail all reports of sticking accelerator pedal(s) Toyota received between March 2007 and the end of January 2008, inclusive, from (a) within and (b) outside of the United States. Identify the make, model, model year and country where each of the Subject Vehicles with the sticking accelerator pedals was located. Describe each and every action by Toyota to investigate the sticking accelerator pedal in each vehicle. Summarize the results of each evaluation and assessment.

ANSWER

13. Toyota is still in the process of reviewing potentially responsive material. Toyota will provide information in response to this request in a supplemental response.

REQUEST

14. State in detail, in chronological order, all information and/or allegations related to the issue(s) of sticking accelerator pedal(s) in Subject Vehicle(s) from the time Toyota first became aware of the issue to the present, both within and outside of the United States. This detailed chronology shall include the date of each incident, the date(s) Toyota received information and/or allegations regarding sticking accelerator pedal(s), an identification of the vehicle (Make, model, model year and VIN if available), country where the alleged sticking incident occurred and owner's name, and a summary of the information and allegations. In this chronology, include each and every complaint and field report (field technical report) that Toyota (including a subsidiary or other business entity controlled by Toyota and located in a foreign country that received information and/or allegations regarding unintended acceleration) received related to sticking accelerator pedals.

ANSWER

14. Toyota is still in the process of reviewing its files for information responsive to this Request. Based upon the materials identified by Toyota as of this time, information and/or allegations related to the issue of sticking accelerator pedals in the subject vehicles, as well as the specific information about the incidents in question and the summaries requested in this Request are provided in the responses to Requests 3, 4, and 5, referred to above. Other information responsive to this request may be contained in documents obtained from the ongoing review of Toyota's files and records, and, if so, it would be included in the response to

Request 42. If Toyota identifies additional relevant information, it will supplement this response.

REQUEST

15. Produce, in chronological order, all documents related to the chronology provided in your response to the immediately above information request.

ANSWER

Toyota is still in the process of reviewing its files for information responsive to this Request, and the response is based on the materials reviewed to date. Responsive documents identified by Toyota to date are provided in the response to Request 6. Other documents responsive to this request may be contained in documents obtained from the ongoing review of Toyota's files and records, and, if so, they would be included in the response to Request 42. If Toyota identifies additional relevant documents, it will supplement this response.

REQUEST

16. Describe in detail, in chronological order, each and every effort by Toyota to inquire into, understand, investigate, assess, analyze, test, study, survey, simulate, evaluate, and /or determine contributing factors to and causes of (collectively, "actions") actual or alleged sticking accelerator pedals in Subject Vehicle(s) or a subset of them. For each such action, provide the following information:
 - a. Action title or identifier;
 - b. The actual or planned start date;
 - c. The actual or expected end date;
 - d. A brief summary of the subject and objective of the action;
 - e. Engineering group(s)/supplier(s) responsible for designing and for conducting the action; and
 - f. A summary of the findings and/or conclusions resulting from the action.

Toyota's response shall address, among other items, all field reports (field technical reports) involving allegations such as an accelerator pedal stuck and engine racing to maximum RPM; the pedal sticking and the engine revving up to maximum RPM; the vehicle accelerating in an uncontrolled manner, with the driver having to lift the throttle

pedal with the driver's foot due to it sticking down while driving; the engine speed stayed high causing uncontrolled acceleration after the accelerator pedal was released; and while driving the engine RPM remained high after releasing the accelerator pedal.

ANSWER

16. Toyota is still in the process of reviewing its files for information responsive to this Request, and the response is based on the materials reviewed to date. Toyota has summarized in a table "actions" (as defined in this Request) that have been identified to date and that were performed in connection with sticking accelerator pedals in Subject Vehicles. We are providing this information as "Attachment-Response 16" stored in the folder "Attachment-Response 16." Please note that the information on this table is confidential, and a request for confidential treatment will be submitted to the Office of Chief Counsel. Other information responsive to this request may be contained in documents obtained from the ongoing review of Toyota's files and records, and, if so, it would be included in the response to Request 42. If Toyota identifies additional relevant information, it will supplement this response.

REQUEST

17. For each action identified in your answer to the immediately above information request, produce copies of all documents related to the action regardless of whether the documents are in interim, draft, or final form. Organize the documents chronologically by action.

ANSWER

17. Toyota is still in the process of reviewing its files for information responsive to this Request, and the response is based on the materials reviewed to date. Documents related to the "actions" identified in the response to Request 16 that have been located to date are provided as "Attachment-Response 17" stored in the folder "Attachment- Response 17." Please note that many of the documents provided in this response are confidential, and a request for confidential treatment will be submitted to the Office of Chief Counsel. Other documents responsive to this request may be contained in documents obtained from the ongoing review of Toyota's files and records, and, if so, they would be included in the response to Request 42. If Toyota identifies additional relevant documents, it will supplement this response.

REQUEST

18. As of January 1, 2007, was Toyota considering and/or assessing alleged or actual sticking accelerator pedal(s) in one or more Subject Vehicles? If your answer is in the affirmative, identify the Subject Vehicles involved, describe in detail all matters considered and assessed and any tentative or actual conclusions that Toyota had reached as of that time. Identify the persons involved in the consideration or assessment.

ANSWER

18. Please see response to Request 16. With respect to the request to identify individuals involved in the consideration or assessment, please see response to Request 38.

REQUEST

19. As of April 1, 2007, was Toyota considering and/or assessing alleged or actual sticking accelerator pedal(s) in one or more Subject Vehicles? If your answer is in the affirmative, identify the Subject Vehicles involved, describe in detail all matters considered and assessed and any tentative or actual conclusions that Toyota had reached as of that time. Identify the persons involved in the consideration or assessment.

ANSWER

19. Please see response to Request 16. With respect to the request to identify individuals involved in the consideration or assessment, please see response to Request 38.

REQUEST

20. As of July 1, 2007, was Toyota considering and/or assessing alleged or actual sticking accelerator pedal(s) in one or more Subject Vehicles? If your answer is in the affirmative, identify the Subject Vehicles involved, describe in detail all matters considered and assessed and any tentative or actual conclusions that Toyota had reached as of that time. Identify the persons involved in the consideration or assessment.

ANSWER

20. Please see response to Request 16. With respect to the request to identify individuals involved in the consideration or assessment, please see response to Request 38.

REQUEST

21. As of October 1, 2007, was Toyota considering and/or assessing alleged or actual sticking accelerator pedal(s) in one or more Subject Vehicles? If your answer is in the affirmative, identify the Subject Vehicles involved, describe in detail all matters considered and assessed and any tentative or actual conclusions that Toyota had reached as of that time. Identify the persons involved in the consideration or assessment.

ANSWER

21. Please see response to Request 16. With respect to the request to identify individuals involved in the consideration or assessment, please see response to Request 38.

REQUEST

22. As of January 1, 2008, was Toyota considering and/or assessing alleged or actual sticking accelerator pedal(s) in one or more Subject Vehicles? If your answer is in the affirmative, identify the Subject Vehicles involved, describe in detail all matters considered and assessed and any tentative or actual conclusions that Toyota had reached as of that time. Identify the persons involved in the consideration or assessment.

ANSWER

22. Please see response to Request 16. With respect to the request to identify individuals involved in the consideration or assessment, please see response to Request 38.

REQUEST

23. As of April 1, 2008, was Toyota considering and/or assessing alleged or actual sticking accelerator pedal(s) in one or more Subject Vehicles? If your answer is in the affirmative, identify the Subject Vehicles involved, describe in detail all matters considered and assessed and any tentative or actual conclusions that Toyota had reached as of that time. Identify the persons involved in the consideration or assessment.

ANSWER

23. Please see response to Request 16. With respect to the request to identify individuals involved in the consideration or assessment, please see response to Request 38.

REQUEST

24. As of July 1, 2008, was Toyota considering and/or assessing alleged or actual sticking accelerator pedal(s) in one or more Subject Vehicles? If your answer is in the affirmative, identify the Subject Vehicles involved, describe in detail all matters considered and assessed and any tentative or actual conclusions that Toyota had reached as of that time. Identify the persons involved in the consideration or assessment.

ANSWER

24. Please see response to Request 16. With respect to the request to identify individuals involved in the consideration or assessment, please see response to Request 38.

REQUEST

25. As of October 1, 2008, was Toyota considering and/or assessing alleged or actual sticking accelerator pedal(s) in one or more Subject Vehicles? If your answer is in the affirmative, identify the Subject Vehicles involved, describe in detail all matters considered and assessed and any tentative or actual conclusions that Toyota had reached as of that time. Identify the persons involved in the consideration or assessment.

ANSWER

25. Please see response to Request 16. With respect to the request to identify individuals involved in the consideration or assessment, please see response to Request 38.

REQUEST

26. As of January 1, 2009, was Toyota considering and/or assessing alleged or actual sticking accelerator pedal(s) in one or more Subject Vehicles? If your answer is in the affirmative, identify the Subject Vehicles involved, describe in detail all matters considered and assessed and any tentative or actual conclusions that Toyota had reached as of that time. Identify the persons involved in the consideration or assessment.

ANSWER

26. Please see response to Request 16. With respect to the request to identify individuals involved in the consideration or assessment, please see response to Request 38.

REQUEST

27. As of April 1, 2009, was Toyota considering and/or assessing alleged or actual sticking accelerator pedal(s) in one or more Subject Vehicles? If your answer is in the affirmative, identify the Subject Vehicles involved, describe in detail all matters considered and assessed and any tentative or actual conclusions that Toyota had reached as of that time. Identify the persons involved in the consideration or assessment.

ANSWER

27. Please see response to Request 16. With respect to the request to identify individuals involved in the consideration or assessment, please see response to Request 38.

REQUEST

28. As of July 1, 2009, was Toyota considering and/or assessing alleged or actual sticking accelerator pedal(s) in one or more Subject Vehicles? If your answer is in the affirmative, identify the Subject Vehicles involved, describe in detail all matters considered and assessed and any tentative or actual conclusions that Toyota had reached as of that time. Identify the persons involved in the consideration or assessment.

ANSWER

28. Please see response to Request 16. With respect to the request to identify individuals involved in the consideration or assessment, please see response to Request 38.

REQUEST

29. As of October 1, 2009, was Toyota considering and/or assessing alleged or actual sticking accelerator pedal(s) in one or more Subject Vehicles? If your answer is in the affirmative, identify the Subject Vehicles involved, describe in detail all matters considered and assessed and any tentative or actual conclusions that Toyota had reached as of that time. Identify the persons involved in the consideration or assessment.

ANSWER

29. Please see response to Request 16. With respect to the request to identify individuals involved in the consideration or assessment, please see response to Request 38.

REQUEST

30. As of January 1, 2010, was Toyota considering and/or assessing alleged or actual sticking accelerator pedal(s) in one or more Subject Vehicles? If your answer is in the affirmative, identify the Subject Vehicles involved, describe in detail all matters considered and assessed and any tentative or actual conclusions that Toyota had reached as of that time. Identify the persons involved in the consideration or assessment.

ANSWER

30. Please see response to Request 16. With respect to the request to identify individuals involved in the consideration or assessment, please see response to Request 38.

REQUEST

31. Describe in detail the decision-making process (including persons and groups involved and all dates associated with any steps in the procedure and process) with regard to Toyota's decision on how to characterize complaints, field reports (field technical reports), and claims related to sticking accelerator pedals identified in your responses to the above information requests, and state in detail Toyota's rationale for not characterizing complaints, field reports (field technical reports), and claims related to sticking accelerator pedals as safety-related, if they were not so characterized.

ANSWER

31. Information responsive to the question of how Toyota personnel communicated about and reviewed and characterized complaints, field reports (field technical reports), and claims, as well as other information related to sticking accelerator pedals that has been identified to date is contained in documents obtained from the ongoing review of Toyota's files and records, which are included in the response to Request 42. Please note that many of the documents provided in that response are confidential, and a request for confidential treatment will be submitted to the Office of Chief Counsel. As Toyota identifies additional relevant documents, it will supplement this response.

A document describing Toyota's general recall decision-making process is provided as Attachment-Response 31.

REQUEST

32. Identify each and every individual (including individuals working for or on behalf of Toyota as well as individuals working for or on behalf of a Toyota supplier) who, after Toyota first became aware of the possibility of or an actual sticking accelerator pedal in one or more Subject Vehicle(s), was informed of the issue, discussed the issue, or was involved with any aspect of the issue including but not limited to investigations and determining root cause, characterizing complaints as safety-related or not, advising on whether to modify or change the accelerator pedal or any part thereof, and implementing changes to the accelerator pedal. For each, separately state when he/she was informed thereof and his/her best recollection of what he/she was informed in relation to the issue or any aspect(s) of the issue. Also, describe what each person's responsibility, role, or other involvement is or was in relation to the issue.

ANSWER

32. It is not reasonable or practicable to reconstruct all of the information necessary to respond to this Request, particularly in the time permitted for response. Without waiving this objection, and with the understanding that Toyota's review of potentially responsive materials is continuing, Toyota is preparing a list of the Toyota offices primarily responsible for working on the analysis and response to the issue of possible sticking pedals. Personnel within these offices have rotated often, but the responsibility has remained constant with those corporate functions. A list of these offices will be included in a supplemental submission.

REQUEST

33. State when Toyota decided to begin and when Toyota began design and material changes regarding accelerator pedals starting with any Aygo/Yaris sold in the United States or a foreign country. State when these changes were implemented. State when Toyota decided to begin and when Toyota began design and material changes regarding accelerator pedals on models, other than the Aygo/Yaris, sold in the United States or a foreign country. State when these changes were implemented, by model and country of sale. Describe in detail the design and material changes implemented by Toyota.

ANSWER

33. Please see response to Request 35.

REQUEST

34. Produce, by Subject Vehicle model, all documents related to your answer to the immediately above information request.

ANSWER

34. Please see response to Request 36.

REQUEST

35. Describe all modifications and/or changes considered and/or made by or on behalf of Toyota, including the supplier(s) of accelerator pedals for Subject Vehicle(s) or for a future model of a Subject Vehicle, in the material composition (e.g., from PA46 material to PPS material), design (e.g., lengthen the arm of the friction lever), manufacturing, quality control, or installation of the accelerator pedals, from the start of production of Subject Vehicle(s) to the present, which relate to or may relate to actual or potential sticking accelerator pedals in Subject Vehicle(s), in the United States and outside the United States, including but not limited to Europe and Canada. For each such modification or change, provide the following information:
- a. The country in which Subject Vehicles(s) with the modification or change were made available and the date the modification or change was first implemented for each Subject Vehicle manufactured for sale in that country;
 - b. A detailed description of the modification or change;
 - c. The reason(s) for the modification or change;
 - d. Whether the modification or change was implemented and if so when;
 - e. The part numbers (service and engineering) of the original accelerator pedal;
 - f. The part number (service and engineering) of the modified accelerator pedal;
 - g. Whether the original unmodified accelerator pedal was withdrawn from production and/or sale and if so, when;
 - h. When the modified accelerator pedal was made available as a service accelerator pedal;
 - i. Whether the modified accelerator pedal can be interchanged with earlier production accelerator pedals;

1. The date or approximate date on which the modification or change was incorporated into vehicle production;
- k. All reasons and technical justifications, including data, for the implementation of the modification or change in some markets (e.g., Europe) but not others (e.g., not the United States) at the time the modification or change initially was implemented.

Also, provide the above information for any modification or change that Toyota is aware of which is tentatively or actually planned to be incorporated into vehicle production within the next year.

ANSWER

35. Toyota is still in the process of reviewing its files for information responsive to this Request, and the response is based on the materials reviewed to date. Toyota has summarized in a table modifications or changes that relate to potential sticking accelerator pedals in subject vehicles that have been identified to date. We are providing this information as “Attachment-Response 35.” Please note that some of the information included in “Attachment-Response 35” is confidential, and a request for confidential treatment will be submitted to the Office of Chief Counsel. Other information responsive to this request may be contained in documents obtained from the ongoing review of Toyota’s files and records, and, if so, it would be included in the response to Request 42. As Toyota identifies additional relevant information, it will supplement this response.

With regard to item “k” of this Request, Toyota will supplement this response.

REQUEST

36. Produce, by action, in chronological order, all documents related to your response to the immediately above information request.

ANSWER

36. Toyota is still in the process of reviewing its files for information responsive to this Request, and the response is based on the materials reviewed to date. Documents related to the information provided in the response to Request 35 that have been located to date are provided electronically in the folder “Attachment-Response 36.” Please note that some of the information included in “Attachment- Response 36” is confidential, and a request for confidential treatment

will be submitted to the Office of Chief Counsel. Other documents responsive to this request may be contained in documents obtained from the ongoing review of Toyota's files and records, and, if so, they would be included in the response to Request 42. As Toyota identifies additional relevant documents, it will supplement this response.

REQUEST

37. With regard to the remedy in Recall 10V-017, state:
- a. What organization within Toyota had been assigned responsibility to develop what ultimately became that remedy;
 - b. When that organization was assigned responsibility to develop what ultimately became that remedy;
 - c. When the conceptual remedy of what ultimately was identified as the remedy was identified;
 - d. The identities of all persons involved in developing the conceptual remedy for what ultimately became that remedy and each person's role in the development;
 - e. When the remedy was finalized for testing purposes;
 - f. When the remedy was tested;
 - g. When the formulation of the remedy was completed;
 - h. When supplier(s) were informed, tentatively, of likely needed parts for the remedy, when parts were priced, and when parts were actually ordered for the remedy; and
 - i. The names of the suppliers for the remedy and what each supplier provided.

ANSWER

37. The information sought in this request is provided in a table as "Attachment-Response 37 TQ10-002." With respect to Request 37.d, it is not reasonable or practicable to identify all persons involved in developing the remedy and what each did. Without waiving this objection, Toyota has preliminarily identified the individuals primarily responsible for the development of the remedy. Please note that some of the information included in this attachment is confidential, and a request for confidential treatment will be submitted to the Office of Chief Counsel. Other information responsive to this request may be contained in documents obtained from the ongoing

review of Toyota's files and records, and, if so, it would be included in the response to Request 42. If Toyota identifies additional relevant information, it will supplement this response.

REQUEST

38. With regard to each and every communication or meeting (in person, by telephone or by other electronic means) between and/or among Toyota employees in which the possibility of the existence of an issue, problem or defect related to sticking accelerator pedals on Subject Vehicle(s) was discussed including but not limited to the incidents themselves, safety—relatedness of sticking accelerator pedal(s), and changes to the accelerator pedal(s) including changes in some markets (e.g., Europe) but not others (e.g., the United States), state the approximate date on which such communication or meeting was held; state the name, job title, office, telephone number and employer of each participant; and provide a detailed summary of each communication or meeting. Identify and produce copies of any documents considered, reviewed, consulted, produced as a result, or otherwise used during each communication or meeting.

ANSWER

38. It is not reasonable or practicable to reconstruct all of the information necessary to respond to this Request, particularly in the time permitted for response and in light of the very large number of "communications and meetings" among Toyota employees on this issue. Without waiving this objection, and with the understanding that Toyota's review of potentially responsive materials is continuing, Toyota has identified numerous documents that relate to communications and meetings referred to in this Request. Copies of those documents are included in the response to Request 42. Many of these documents are confidential, and a request for confidential treatment will be submitted to the Office of Chief Counsel. As Toyota identifies additional relevant information, it will supplement this response.

REQUEST

39. With regard to each and every communication, correspondence or notification between Toyota and any other person or entity not identified in your response to the immediately above information request concerning the existence of an issue, problem or defect in the Subject Vehicle(s) related to a sticking accelerator pedal, including CTS Corporation to the extent not included in your response to the immediately above information request, state the approximate date on which each such communication, correspondence or notification was sent; identify the author and recipient of any document; and provide a

detailed summary of each communication, correspondence or notification. Identify and produce copies of any documents considered, reviewed, consulted, produced as a result, or otherwise used, during each communication, correspondence, or notification.

ANSWER

39. It is not reasonable or practicable to reconstruct all of the information necessary to respond to this request, particularly in the time permitted for this response, and in light of the very large number of “communications and meetings” between Toyota employees and other persons involving this issue. Without waiving this objection, and with the understanding that Toyota’s review of potentially responsive materials is continuing, Toyota has identified numerous responsive documents involving communications and meetings between Toyota employees and other persons involving this issue. Copies of those documents are included in the response to Request 42. Many of these documents are confidential, and a request for confidential treatment will be submitted to the Office of Chief Counsel. As Toyota identifies additional relevant information, it will supplement this response.

REQUEST

40. Produce, in chronological order, all documents amounting to or referring to communications between Toyota and CTS Corporation, a supplier of pedals to Toyota identified in Toyota’s January 21, 2010 Part 573 report for Recall 10V-017, related to sticking accelerator pedals.

ANSWER

40. Toyota is still in the process of reviewing potentially responsive material. Toyota will provide information in response to this request in a supplemental response.

REQUEST

41. Separately, with regard to Toyota’s response to each information request above, identify each person who provided information regarding the response.

ANSWER

41. Toyota will provide information in response to this request in a supplemental response.

REQUEST

42. Separately, with regard to Toyota's response to each information requests above, identify each document considered or relied upon by Toyota in formulating its response, or otherwise.

ANSWER

42. It is not reasonable or practicable to organize all of the responsive documents separately by Request (except to the extent that Toyota has already done so in its responses to those Requests), in part because many of those documents are responsive to more than one request, and it would be unreasonably burdensome and redundant to organize the documents in this fashion. Without waiving this objection, and with the understanding that Toyota's review of potentially responsive documents is continuing, Toyota has identified a substantial number of potentially responsive documents that may not have been produced elsewhere in this response. These documents have been placed in the folder "TQ10-002-01." Many of these documents are confidential, and a request for confidential treatment will be submitted to the Office of Chief Counsel. As Toyota identifies additional relevant information or documents, it will supplement this response.

* * *

ADDITIONAL STATEMENTS

Toyota is not providing privileged documents that may be responsive to this information request. These include (a) communications between outside counsel and employees of Toyota's Law Department, other Toyota employees, or employees of parties represented by Toyota in litigation or claims; (b) communications between employees of Toyota's Law Department and other Toyota employees or employees of parties represented by Toyota in litigation or claims; (c) notes and other work product of outside counsel or employees of Toyota's Law Department, including work product of employees or consultants done for or at the request of outside counsel or Toyota's Law Department. Toyota is not claiming a legal privilege for any documents provided with this response; however, Toyota does not waive the legal privilege or work product protection with respect to other documents that may have been prepared in connection with a specific litigation or claim. In addition, Toyota may assert the attorney client privilege or claim protection under the work-product doctrine for analyses or other documents that may be prepared in connection with litigation or claims in the future.

In its search for responsive materials, Toyota has identified numerous documents in the Japanese language. Consistent with the instructions in the IR, Toyota is arranging for translations of each such document into English. For those document that have not yet been translated, the production set will identify the document as “translation pending.” Toyota will supplement this response with the Japanese documents and the English translations when the translations have been completed.

Although Toyota is responding to all of the requests posed by the agency and has endeavored to identify and provide all responsive documents, Toyota is objecting to certain of the definitions, instructions and requests contained in the IR:

Toyota objects to the definition of “documents” in the IR because it exceeds a reasonable understanding of the term “documents.”

Toyota objects to the definition of “Toyota” to the extent it purports to include outside counsel. It would be unduly burdensome to require Toyota to request that outside counsel search files for responsive documents. Moreover, it is highly unlikely that outside counsel would possess any non-privileged documents responsive to this IR that are not already being produced by Toyota. In light of the significant burden and cost associated with canvassing outside counsel for potentially responsive documents and the very low probability of identifying any non-privileged document not already being produced, Toyota has not asked its outside counsel to search for responsive documents.

Toyota understands that NHTSA will protect any private information about persons that is contained in this response, based on privacy considerations. Such private information includes data such as names, addresses, phone or fax numbers, email addresses, license plate numbers, driver's license numbers and last 6 digits of the vehicle's VIN.

TQ10-002
PART NUMBER LISTS
REQUESTS 9 AND 11

TQ10-002 IR9 part numbers

Part Number	Part Description
7801012181	PEDAL ASSY, ACCELERATOR
7811002010	SENSOR ASSY, ACCELERATOR PEDAL
7811002011	SENSOR ASSY, ACCELERATOR PEDAL
7811002020	SENSOR ASSY, ACCELERATOR PEDAL
7811002021	SENSOR ASSY, ACCELERATOR PEDAL
7811002030	SENSOR ASSY, ACCELERATOR PEDAL
7811002070	SENSOR ASSY, ACCELERATOR PEDAL
7811002071	SENSOR ASSY, ACCELERATOR PEDAL
7811005020	SENSOR ASSY, ACCELERATOR PEDAL
7811005021	SENSOR ASSY, ACCELERATOR PEDAL
7811007010	SENSOR ASSY, ACCELERATOR PEDAL
7811007011	SENSOR ASSY, ACCELERATOR PEDAL
7811008010	SENSOR ASSY, ACCELERATOR PEDAL
781100C010	SENSOR ASSY, ACCELERATOR PEDAL
781100C011	SENSOR ASSY, ACCELERATOR PEDAL
781100C012	SENSOR ASSY, ACCELERATOR PEDAL
781100D010	SENSOR ASSY, ACCELERATOR PEDAL
781100D011	SENSOR ASSY, ACCELERATOR PEDAL
781100D020	SENSOR ASSY, ACCELERATOR PEDAL
781100D021	SENSOR ASSY, ACCELERATOR PEDAL
781100D030	SENSOR ASSY, ACCELERATOR PEDAL
781100D031	SENSOR ASSY, ACCELERATOR PEDAL
781100H010	SENSOR ASSY, ACCELERATOR PEDAL
781100H011	SENSOR ASSY, ACCELERATOR PEDAL
781100H020	SENSOR ASSY, ACCELERATOR PEDAL
781100H021	SENSOR ASSY, ACCELERATOR PEDAL
781100H030	SENSOR ASSY, ACCELERATOR PEDAL
781100H031	SENSOR ASSY, ACCELERATOR PEDAL
781100R020	SENSOR ASSY, ACCELERATOR PEDAL
781100R021	SENSOR ASSY, ACCELERATOR PEDAL
781100R030	SENSOR ASSY, ACCELERATOR PEDAL
7811207050	PLATE, ACCELERATOR PEDAL
7811207070	PLATE, ACCELERATOR PEDAL
781100W010	SENSOR ASSY, ACCELERATOR PEDAL
781100W011	SENSOR ASSY, ACCELERATOR PEDAL
781100W020	SENSOR ASSY, ACCELERATOR PEDAL
781100W021	SENSOR ASSY, ACCELERATOR PEDAL
781100W022	SENSOR ASSY, ACCELERATOR PEDAL
781100W023	SENSOR ASSY, ACCELERATOR PEDAL
781100W030	SENSOR ASSY, ACCELERATOR PEDAL
781100W031	SENSOR ASSY, ACCELERATOR PEDAL
781100W032	SENSOR ASSY, ACCELERATOR PEDAL
781100W033	SENSOR ASSY, ACCELERATOR PEDAL
7812008020	ROD ASSY, ACCELERATOR PEDAL

TQ10-002 IR11 part numbers

Part Number	Part Number Description
7801013010	PEDAL ASSY, ACCELERATOR
7801021020	PEDAL ASSY, ACCELERATOR
7801033010	PEDAL ASSY, ACCELERATOR
7801033030	PEDAL ASSY, ACCELERATOR
7801033040	PEDAL ASSY, ACCELERATOR
7811002010	SENSOR ASSY, ACCELERATOR PEDAL
7811002011	SENSOR ASSY, ACCELERATOR PEDAL
7811002020	SENSOR ASSY, ACCELERATOR PEDAL
7811002021	SENSOR ASSY, ACCELERATOR PEDAL
7811002030	SENSOR ASSY, ACCELERATOR PEDAL
7811002040	SENSOR ASSY, ACCELERATOR PEDAL
7811002050	SENSOR ASSY, ACCELERATOR PEDAL
7811002060	SENSOR ASSY, ACCELERATOR PEDAL
7811002070	SENSOR ASSY, ACCELERATOR PEDAL
7811002071	SENSOR ASSY, ACCELERATOR PEDAL
7811005020	SENSOR ASSY, ACCELERATOR PEDAL
7811005021	SENSOR ASSY, ACCELERATOR PEDAL
7811006010	SENSOR ASSY, ACCELERATOR PEDAL
7811006020	SENSOR ASSY, ACCELERATOR PEDAL
7811006030	SENSOR ASSY, ACCELERATOR PEDAL
7811006070	SENSOR ASSY, ACCELERATOR PEDAL
7811007010	SENSOR ASSY, ACCELERATOR PEDAL
7811007011	SENSOR ASSY, ACCELERATOR PEDAL
7811008010	SENSOR ASSY, ACCELERATOR PEDAL
781100C010	SENSOR ASSY, ACCELERATOR PEDAL
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781100D020	SENSOR ASSY, ACCELERATOR PEDAL
781100D021	SENSOR ASSY, ACCELERATOR PEDAL
781100D030	SENSOR ASSY, ACCELERATOR PEDAL
781100D031	SENSOR ASSY, ACCELERATOR PEDAL
781100H010	SENSOR ASSY, ACCELERATOR PEDAL
781100H011	SENSOR ASSY, ACCELERATOR PEDAL
781100H020	SENSOR ASSY, ACCELERATOR PEDAL
781100H021	SENSOR ASSY, ACCELERATOR PEDAL
781100H030	SENSOR ASSY, ACCELERATOR PEDAL
781100H031	SENSOR ASSY, ACCELERATOR PEDAL
781100R020	SENSOR ASSY, ACCELERATOR PEDAL
781100R030	SENSOR ASSY, ACCELERATOR PEDAL
781100W010	SENSOR ASSY, ACCELERATOR PEDAL
781100W011	SENSOR ASSY, ACCELERATOR PEDAL
781100W020	SENSOR ASSY, ACCELERATOR PEDAL
781100W021	SENSOR ASSY, ACCELERATOR PEDAL

781100W022	SENSOR ASSY, ACCELERATOR PEDAL
781100W023	SENSOR ASSY, ACCELERATOR PEDAL
781100W030	SENSOR ASSY, ACCELERATOR PEDAL
781100W031	SENSOR ASSY, ACCELERATOR PEDAL
781100W032	SENSOR ASSY, ACCELERATOR PEDAL
781100W033	SENSOR ASSY, ACCELERATOR PEDAL
7811012010	SENSOR ASSY, ACCELERATOR PEDAL
7811012020	SENSOR ASSY, ACCELERATOR PEDAL
7811012030	SENSOR ASSY, ACCELERATOR PEDAL
7811012040	SENSOR ASSY, ACCELERATOR PEDAL
7811033010	SENSOR ASSY, ACCELERATOR PEDAL
7811033020	SENSOR ASSY, ACCELERATOR PEDAL
7811033050	SENSOR ASSY, ACCELERATOR PEDAL
7811033060	SENSOR ASSY, ACCELERATOR PEDAL
7811033110	SENSOR ASSY, ACCELERATOR PEDAL
7811042010	SENSOR ASSY, ACCELERATOR PEDAL
7811042030	SENSOR ASSY, ACCELERATOR PEDAL
7811048010	SENSOR ASSY, ACCELERATOR PEDAL
7811048020	SENSOR ASSY, ACCELERATOR PEDAL
7811052010	SENSOR ASSY, ACCELERATOR PEDAL
7811052020	SENSOR ASSY, ACCELERATOR PEDAL
7811052070	SENSOR ASSY, ACCELERATOR PEDAL
7811060010	SENSOR ASSY, ACCELERATOR PEDAL
7811060020	SENSOR ASSY, ACCELERATOR PEDAL
7811074010	SENSOR ASSY, ACCELERATOR PEDAL
7811074020	SENSOR ASSY, ACCELERATOR PEDAL
7812002130	ROD ASSY, ACCELERATOR PEDAL
7812002140	ROD ASSY, ACCELERATOR PEDAL
7812002150	ROD ASSY, ACCELERATOR PEDAL
7812002160	ROD ASSY, ACCELERATOR PEDAL
7812012370	ROD ASSY, ACCELERATOR PEDAL
7812012380	ROD ASSY, ACCELERATOR PEDAL
7812012390	ROD ASSY, ACCELERATOR PEDAL
7812012400	ROD ASSY, ACCELERATOR PEDAL
7812013020	ROD ASSY, ACCELERATOR PEDAL
7812021030	ROD ASSY, ACCELERATOR PEDAL
7812033120	ROD ASSY, ACCELERATOR PEDAL
7812033140	ROD ASSY, ACCELERATOR PEDAL
7812033150	ROD ASSY, ACCELERATOR PEDAL
7812048070	ROD ASSY, ACCELERATOR PEDAL
7812048080	ROD ASSY, ACCELERATOR PEDAL
7812048090	ROD ASSY, ACCELERATOR PEDAL