

III. Quality/Compliance Issues

NHTSA Investigation on Lexus ES350 All Weather Floor Mats – TMA and TMC are working to develop the response to the IR letter, due June 6. TMA assisted NHTSA in obtaining three sets of all weather mats for the test facility, VRTC. TMS has the all weather mat on stop sale.

NHTSA Investigation on Sienna Liftgate Support Struts – On May 16, TMA gave a presentation to NHTSA regarding the operation and safety features of the Sienna Power Liftgate. Two vehicles were brought to NHTSA's building and set up in the courtyard. During the presentation there was a demonstration of the power system, and struts of varying strength levels were placed on the vehicles. NHTSA was shown jam and pinch protection, and the initiation of power closure when the struts can no longer support the weight of the liftgate. Toyota's position is that liftgate struts are wear items, and that their failure mode is progressive and their failure is easily apparent to the operator. NHTSA expressed concern that regardless of the nature of the failure mode, the Sienna stands out from peers for reports of injuries related to the strut degradation. NHTSA is currently conducting their own test program on the Sienna and will issue Ford a peer IR letter.

Early Warning Reporting (EWR) – Death Inquiry (DI) – TMA submitted the response to the DI letter (DI07-019) from NHTSA on April 30. An additional DI letter (DI07-051) was received on May 14. The letter requests the initial claim or notice of five of the incidents reported in the 4th quarter of 2006 EWR submission. It also requests a copy of the police accident report, if available. At our option, we may assess the claim and provide our opinion.

Peer Vehicle IR - GM Trailer Hitches - NHTSA is conducting an investigation (PE07-025) of alleged hitch receiver failure in certain Model Year (MY) 2002 C/K 2500 SUV's and Pickup's. For a comparative assessment, they are requesting information concerning certain Toyota vehicles (Tundra/Sequoia) equipped with original equipment hitch receivers used for towing campers and trailers. The response is due June 29.

IV. Assessment

Frontal NCAP Test – 2007 MY Toyota Tundra Crew Max – TMA successfully negotiated a delay in the release of the Tundra 4 star frontal rating with NHTSA. NHTSA had intended on releasing the data on Wednesday, May 2. However, since the test data was only received by TTC on Tuesday, May 1, and TMC was closed for Golden Week, TMA convinced NHTSA to hold the rating for 1 week, until May 8. The ratings eventually were posted on May 14. Also, TMA requested (on behalf of TTC) and received verbal approval from NHTSA, for TTC to borrow the Tundra CrewMax frontal NCAP test vehicle.

Compliance Tests - 2007 MY FMVSS 208 AF05 Unbelted Compliance Test Schedule – NHTSA is still planning on meeting the scheduled test dates of June 5 through June 7 for Camry, Yaris, and Prius. Each vehicle will be tested in the 25 mph unbelted 5th female frontal barrier test after they return from the dealership to have the steering column and other components replaced.

Compliance Tests - 2007 MY FMVSS 208 Low Risk Deployments - TMA attended the low risk deployment tests of the 2007 MY Camry, Prius, and Yaris driver airbags at MGA in Burlington, Wisconsin. Position 1 (Chin on Module) and Position 2 (Chin on Rim) were tested for each vehicle, with only the airbag module replaced between positions. Preliminary results indicate that all three vehicles meet the requirements of this portion of the regulation. There were no issues

with dummy positioning, although NHTSA has changed their policy with regards to initial leg positioning. Per the procedure, the dummy lower legs are to be placed perpendicular to the vehicle floor at the start of the positioning. NHTSA now leaves the legs stretched out in the foot well at the start of the positioning, which they say allows them to conduct more deployment tests without taping the dummy into position.

Compliance Tests - FMVSS 301R Rear Impact Tests and FMVSS 305 - NHTSA decided to test both the Prius and the Camry Hybrid for compliance with FMVSS 301R. The Prius is not certified to the new, more severe rear impact test, and was tested on May 20 in the 30mph test with full overlap. The Camry Hybrid is certified to the new standard, and will be tested at 50mph with a 70% overlap. Both vehicles will have FMVSS 305 (Electrical Shock Prevention) compliance confirmed after the test. TMA attended the Prius test (see results in next section). Toyota may be allowed to attend the Camry test if NHTSA also attends. NHTSA may not be able to attend due to budgetary travel restrictions.

Compliance Test - 2007 MY Toyota Prius FMVSS 301R and FMVSS 305 - TMA attended the 30mph full-width moving rigid barrier rear impact test of the 2007 MY Toyota Prius. After the test, compliance with FMVSS 305 (Electrolyte Leakage and Electrical Shock Prevention) was confirmed. Both NHTSA and the test lab (MGA) are having difficulty understanding how to measure electrical isolation on the Toyota hybrid vehicles. TMA believes the reason for this is because the measurement equipment being used for voltages is inappropriate for compliance testing. The voltage readings obtained by the lab were unstable due to the very appropriate design (and characteristics) of the electrically isolated propulsion battery. TMA is working with TMC to better support and educate NHTSA on conducting these types of tests.

OTHER?:

NHTSA Buying a Safer Car Meeting - TMA met with NHTSA and several other manufacturers to hear NHTSA's changes to the "Buying a Safer Car" brochure and website. NHTSA is integrating the safety defect hotline into the Safercar.gov website. Consumers will be able to review crash test ratings and file safety related defect complaints at one website, effective September 1. In addition, the NCAP office presented the general process for the new "Stars on Cars" regulation, based on the final rule. TMA is reviewing this information and creating some guidelines for TMC and TMS to help facilitate the process of putting crash test ratings on our vehicle window stickers.

Meeting with OD-GM Mr. Sato - On April 30, TMA met with TMC-QD General Manager Mr. Sato to discuss current Quality Division activity. TMA gave a presentation highlighting the internal changes at NHTSA as well as recent defect and compliance activity. There was also discussion regarding the use of Early Warning Data to predict NHTSA actions.