TOYOTA

**TOYOTA MOTOR NORTH AMERICA, INC.**

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September 26, 2007

Mr. Daniel C. Smith
Associate Administrator for Enforcement
National Highway Traffic Safety Administration
1200 New Jersey Avenue, SE
Washington, DC 20590

Re: Toyota and Lexus Optional Equipment All Weather Floor Mat
Part 573, Defect Information Report

Dear Mr. Smith:

On behalf of Toyota Motor Corporation ["TMC"], we hereby submit the attached Defect Information Report concerning a voluntary safety campaign of certain Toyota and Lexus Optional Equipment All Weather Floor Mats.

Toyota has carefully evaluated the agency's concerns in the defect investigation EA07-010 and has concluded that the subject vehicles do not contain a safety related defect. With respect to the All Weather Floor Mats that are associated with the field incidents reported in EA07-010, Toyota concluded that the mats do not contain a safety-related defect; however, Toyota agrees that an unsecured All Weather Floor Mat, especially one that is stacked on top of another floor mat, can migrate toward the accelerator pedal, potentially preventing it from returning to idle. To address this issue, and to resolve the agency's concerns in the defect investigation EA07-010, Toyota is submitting the information called for in Part 573 of your regulations for an equipment recall.

Toyota will voluntarily comply with all aspects of 49 CFR 577 when conducting the owner notification for this campaign. Should you have any questions about this report, please contact Mr. Chris Santucci at (202) 775-1707.

Sincerely,

TOYOTA MOTOR NORTH AMERICA, INC.

Chris Tinto
Vice President
Technical & Regulatory Affairs

CT:cs
Attachment

DEFECT INFORMATION REPORT

1. Component Controlling Corporation:

Toyota Motor Sales, USA, Inc. ["TMS"]
19001 South Western Avenue,
Torrance, CA 90509

Actual Component Manufacturer:

Thermoflex Corporation
1535 S. Lakeside Drive
Waukegan, IL 60085
Telephone: 847-473-9011

2. Identification of Affected Equipment:

The items of equipment involved are the Lexus/Toyota All Weather Floor Mats sold as an optional accessory mat for certain 2007 and early 2008 model year Lexus ES350 and Toyota Camry vehicles.

| Component Name | Part Number | Dates of Manufacture |
|---|---|---|
| Lexus/Toyota optional All Weather Floor Mat | PT908-33070<br>PT908-33071<br>PT908-32070 | January 23, 2006<br>through<br>September 13, 2007 |

3. Total Number of Equipment Potentially Affected:

Approx. 55,000 All Weather Floor Mats

4. Percentage of Equipment Estimated to Actually Contain the Defect:

100%

5. Description of Problem:

The subject All Weather Floor Mat (AWFM) is specifically designed for the 2007 and early 2008 model year Lexus ES350 and Toyota Camry vehicles. It includes two grommet holes and retaining hooks (clips) to secure the mat to the vehicle's carpet. If the AWFM is not secured by the retaining hooks (clips) either by itself or if it is placed on top of an existing carpeted floor mat, the mat could move forward during the vehicle usage and it may interfere with the accelerator pedal. In the worst case, the accelerator pedal may temporarily become stuck in a partially depressed position when returning to the idle position. However, if the mat is properly secured, it will not interfere with the accelerator pedal.

6. Chronology of Principal Events:

In March 2007, NHTSA opened a Preliminary Investigation (PE07-016) concerning the interference between the AWFM and accelerator pedal on the 2007 model year Lexus ES350 vehicles when the AWFM is placed on top of an existing carpeted floor mat. Toyota studied the issue and concluded that if the AWFM is used by itself and secured properly by the retaining clips (as Toyota instructs in the owner's manual), it cannot interfere with the accelerator pedal. However, to address the issue, Toyota decided to conduct an owner mailing to all owners of 2007 model year Lexus ES350 vehicles from late-April through mid-May, advising the proper use and installation of the AWFM. In addition, Toyota implemented some enhancements on the AWFM and its packaging that further highlight the installation instructions of the AWFM.

In August 2007, NHTSA upgraded the investigation to an Engineering Analysis (EA07-010) based on 17 complaints which NHTSA had received. Toyota believes that the AWFM can never interfere with the accelerator pedal if it is properly secured with the retaining clips as Toyota instructs, and that no defect exists with the AWFM and the vehicles themselves. However, to alleviate the concerns of NHTSA and our customers about safety, and to reduce the possibility that the accelerator pedal may become stuck in a partially depressed position due to interference with the AWFM in the event it is not secured by the retaining clips, Toyota decided to conduct a voluntary safety campaign to replace all of the aforementioned AWFMs with a redesigned one.

7. Description of Corrective Repair Action:

All owners of 2007 and early 2008 model year Lexus ES350 and Toyota Camry vehicles will be notified, by first class mail, of the safety campaign and the timing when the replacement AWFM will become available. Once the replacement AWFM is available, a second owner notification will be sent to notify owners to return their AWFM for the driver's seating position to any Lexus/ Toyota dealer for an exchange of the AWFM.

Toyota has also stopped the sale of the Toyota/Lexus All Weather Floor Mat designed specifically for 2007 and early 2008 model year Camry and ES 350 vehicles.

Reimbursement Plan for pre-notification remedies:

The owner letter will instruct owners that have previously paid for the replacement of the subject AWFM for a similar condition prior to this campaign to seek reimbursement by mailing a copy of their repair order, proof-of-payment, and proof-of-ownership for reimbursement consideration.

8. Recall Schedule:

First mailing of the owner notification will commence in early October 2007 and will be completed by mid October 2007. The second owner notification will begin mailing in mid-to-late November, 2007.

Copies of the owner notification and dealer instructions will be submitted as soon as they are available.

9. Distributor/Dealer Notification Schedule:

Notifications to distributors/dealers will be sent in the end of September 2007.