

# TOYOTA

TOYOTA MOTOR NORTH AMERICA, INC.  
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October 5, 2009

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

RE: Certain Toyota and Lexus Vehicles  
Potential Floor Mat Interference with Accelerator Pedal

Dear Mr. Smith:

On September 29, 2009 Toyota issued a consumer safety advisory to address the risk of floor mat entrapment of accelerator pedals in certain Toyota and Lexus models. Toyota urged owners of potentially affected vehicles to take out removable drivers' side floor mats in their vehicles, pending the development of model-specific remedies. Toyota undertook this action in response to reports of vehicles accelerating rapidly after release of the accelerator pedal, due to entrapment of the pedal by unsecured or improper floor mats.

The purpose of this letter is to transmit the information specified by Part 573 of your regulations with respect to the forthcoming safety campaign, which will provide a vehicle-based remedy for affected vehicles to reduce the risk of future incidents.

Although Toyota is willing to identify this campaign as a safety recall in the owner communication about the campaign, Toyota has not determined that the vehicles identified in item 2, below, contain a "safety-related defect" within the meaning of the federal vehicle safety laws. Nevertheless, Toyota will voluntarily notify its customers of this campaign and will voluntarily cooperate with NHTSA's recall procedures by providing six quarterly reports of campaign completion.

Toyota understands that NHTSA will assign a recall number to this campaign, as if it were a campaign conducted under the Safety Act, and will post the information about the campaign on the NHTSA/ODI website. Toyota also requests that the summary of the campaign on the NHTSA/ODI website contain a notation that Toyota has not made a decision that these vehicles contain a safety-related defect.

A draft owner notification letter will be provided under separate cover. Please see the following information, as specified in Part 573 of your regulations:

**1. Manufacturer's name/address:**

Toyota Motor Corporation ["TMC"]  
 1, Toyota-cho, Toyota-city,  
 Aichi-ken, 471-8571, Japan

**Affiliated U.S. Sales Company**

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

**2. Vehicles involved in this notification:**

Based on production records, we have determined the affected vehicle population to be the population described in the table below:

Make/ Car Line	Model Year	Manufac- turer	VIN		Production Period
			VDS	VIS	
Camry	2007- 2010	TBD	TBD	TBD	TBD
Avalon	2005- 2010	TBD	TBD	TBD	TBD
Prius	2004- 2009	TBD	TBD	TBD	TBD
Tacoma	2005- 2010	TBD	TBD	TBD	TBD
Tundra	2007- 2010	TBD	TBD	TBD	TBD
Lexus ES 350	2007- 2010	TBD	TBD	TBD	TBD
Lexus IS 250/350	2006- 2010	TBD	TBD	TBD	TBD

Please note this list of vehicles is preliminary and may change as Toyota's internal investigation continues. We will advise you promptly of any changes to this list.

**3. Total number of vehicles:**

As noted in item 2, above, Toyota is still in the process of determining the scope of the affected vehicle population. We currently estimate that there are 3.8 million vehicles identified in item 2, above; however, this estimate is subject to change as Toyota refines the number of affected vehicles by model.

**4. Approximate percentage of vehicles estimated to actually contain the condition:**

Unknown

**5. Description of the condition:**

Toyota has determined that there is a potential for an accelerator pedal to get stuck in the wide open position due to an unsecured or incompatible driver's floor mat. A stuck open accelerator pedal may result in very high vehicle speeds and make it difficult to stop the vehicle, which could cause a crash, serious injury or death.

**6. Chronological summary of events leading to this campaign:**

In 2007, Toyota undertook a voluntary safety campaign of all-weather floor mats designed for certain Lexus ES350 and Toyota Camry models to address the risk of potential floor mat interference with the accelerator pedal.

Recent events have prompted Toyota to take a closer look at the potential for accelerator pedal entrapment by unsecured or incompatible floor mats in these models, as well as other Toyota and Lexus models on which complaints of entrapment have been received. On September 29, Toyota determined to conduct a safety campaign to address this condition.

**7. Description of Campaign (including schedule for dealer and customer notification):**

Toyota will notify owners of affected vehicles to take out any removable driver's floor mat and not replace it with any other floor mat, pending the development of model-specific remedies. Toyota expects to carry out this customer notification via first class mail, and expects to begin the mailing in late October (by model)

and expects to complete the mailing in December. A draft copy of the owner letter will be provided under separate cover.

After Toyota completes its countermeasure development actions, it will provide a second notification to owners of affected vehicles about the availability of a free remedy. Toyota will provide you with an advance draft of the notification for your review when it is available. Toyota does not currently have a firm schedule for the second notification; however, Toyota will provide such a schedule as soon as possible. Please note that different models may be ready for the second notification at different times. Toyota will keep your staff informed as this schedule evolves.

Toyota has notified its dealers about the safety advisory. A copy of the dealer communication will be provided under separate cover. When the second notification for customers is ready to begin, Toyota will notify its dealers and provide appropriate documentation for the action to them. This schedule will be developed in parallel with the schedule for second notification of customers.

Toyota believes that the reimbursement provisions of Part 573 are not applicable to this campaign, because no vehicle owner will have obtained the as-yet undeveloped countermeasure(s) at his/her own expense.

Toyota appreciates this opportunity to cooperate with NHTSA. Should you have any questions about this information, please let me know at (202) 775-1707.

Sincerely,

TOYOTA MOTOR NORTH AMERICA, INC.

A handwritten signature in black ink, appearing to read 'CS', with a long horizontal flourish extending to the right.

Chris Santucci  
Assistant Manager  
Technical & Regulatory Affairs