

**TOYOTA'S JANUARY 19, 2011 SUPPLEMENTAL RESPONSE TO
ODI'S FEBRUARY 16, 2010 INFORMATION REQUEST IN RQ10-003**

On April 19, 2010, Toyota Motor Corporation (TMC) and its affiliated companies (referred to herein as "Toyota") submitted an extensive response to an Information Request (IR) issued by NHTSA's Office of Defects Investigation (ODI) on February 16, 2010 in this proceeding that sought information with respect to the possibility of unintended acceleration in certain Toyota vehicles, focusing on issues other than interference between the accelerator pedal and the driver's side floor mat (which were addressed in TQ10-001) and other than sticking accelerator pedals (which were addressed in TQ10-002). Toyota has provided supplemental responses to that IR on several occasions.

As part of its continuing review of its files and documents, Toyota has identified several categories of documents that appear to be responsive to one or more of the requests in the February 16, 2010 IR. Toyota today is submitting these additional materials, as described below:

1. Request 3(a) of the February 16, 2010 IR directed Toyota to state the number of "consumer complaints, including those from fleet operators" received by Toyota with respect to subject vehicles manufactured for sale or lease in the United States that "relate to or may relate to unintended acceleration," other than items identified in the company's responses to the IRs in TQ10-001 and TQ10-002. In turn, Request 4 of that IR directed Toyota to provide a wide range of information about each of the items within the scope of the response to Request 3, and Request 5 of the IR directed Toyota to provide copies of all documents related to each of those items.

Following its initial response to the February 16, 2010 IR, Toyota has conducted additional reviews of its consumer complaint database and of the consumer complaints that were identified as responsive in its initial response. Toyota has identified additional consumer complaints that appear to be responsive to Request 3(a) that were not previously provided to the agency.

Based upon its review of this consumer complaint data, Toyota today is providing amended responses to Requests 3(a), 4, and 5 of the IR. The revised number of consumer complaints received by Toyota that relate to or may relate to floor mat interference with the accelerator pedal in the Subject Vehicles is located in the folder "RQ10-003-IR03" as "MANUFACTURER REPORT COUNT-US_20110119_Supplemental.xls." In addition, in response to Request 4, Toyota is providing a revised spreadsheet located in the folder "RQ10-003-IR04" as "REQUEST NUMBER FOUR DATA_20110119_Supplemental.mdb." Finally, Toyota is providing copies of each of these consumer complaints, along with associated information and documents, in the folder "RQ10-003-IR05A."

2. Request 3(b) of the February 16, 2010 IR directed Toyota to state the number of "field reports, including dealer field reports" received by Toyota with respect to subject vehicles manufactured for sale or lease in the United States that "relate to or may relate to unintended acceleration," other than items identified in the company's responses to the IRs in TQ10-001 and TQ10-002. In turn, Request 4 of that IR directed Toyota to provide a wide range of information

about each of the items within the scope of the response to Request 3, and Request 5 of the IR directed Toyota to provide copies of all documents related to each of those items.

On page 5 of the February 16, 2010 IR, ODI stated that, for purposes of the IR, various terms, including “field report” and “dealer field report,” have the same meaning as found in 49 CFR 579.4, which is the definitions section of NHTSA’s Early Warning Reporting (EWR) regulations, 49 CFR Part 579. Thus, in responding to Request 3(b), Toyota applied the same approach in identifying field reports as it did in preparing its quarterly EWR submissions to ODI.

Several months ago, well after the company’s initial response to the IR, Toyota representatives with responsibility for preparing the company’s EWR submissions determined that a category of documents known as Technical Assistance System (TAS) case records, which had previously not been considered to be field reports for EWR purposes, in fact fit within the definition of “dealer field reports” and therefore should have been included in the counts of field reports provided in the company’s quarterly EWR submissions. On October 6, 2010, several Toyota representatives met with representatives of ODI’s Early Warning Division, as well as with Richard Boyd, the Acting Director of ODI, to provide a history of the TAS program.

TAS reports previously had been excluded from EWR submission because, at its inception, the TAS program was a telephone-based call management system for technical support to dealer service personnel. The dealer representatives did not provide any information in writing, and case records created by the TAS center representatives, accordingly, were not reportable field reports under the EWR definition. In 2005-2006, however, TAS changed to a web-based system. In order to increase the effectiveness of the TAS system, technicians were allowed to enter information prior to calling TAS center representatives for repair support.

During the period from 2006 to early 2009, about one-third of the dealer technicians using TAS used this new capability. In 2009, Toyota advised dealers that the technicians would be expected to provide information in writing through an intranet web site form prior to calling the TAS center, although it still allowed technicians to call without doing so. By March 2010, over 90 percent of the TAS calls were preceded by a written communication from the dealer technician. During the past two years, there were approximately 25,000 such communications each calendar quarter.

Although Toyota now recognizes that such written communications appear to come within the definition of dealer field reports, the company did not realize it until recently. At the October 6, meeting with ODI, Toyota stated that, going forward, it would include TAS case records in the counts of field reports for EWR purposes. At ODI’s request, the company also pledged to review its records and provide revised counts of field reports beginning with the second quarter of 2009.

In addition to these TAS case records, Toyota has identified a small number of additional responsive field technical reports (FTR) that were not previously provided to the agency. Toyota today is providing amended responses to Requests 3(b), 4, and 5 of the IR to reflect the TAS case records and the newly-identified FTRs. The revised number of field reports received by Toyota that relate to or may relate to floor mat interference with the accelerator pedal in the Subject Vehicles is located in the folder “RQ10-001-IR03” as “MANUFACTURER REPORT COUNT-

US_20110119_Supplemental.xls.” In addition, in response to Request 4, Toyota is providing a revised spreadsheet located in the folder “RQ10-001-IR04” as “REQUEST NUMBER FOUR DATA_20110119_Supplemental.mdb.” Finally, Toyota is providing copies of each of these TAS case records and newly-identified FTRs in the folder “RQ10-001-IR05B.”

3. Request 6(a) of the February 16, 2010 IR directed Toyota to state the number of customer complaints received by Toyota with respect to subject vehicles manufactured for sale or lease outside the United States that relate to or may relate to unintended acceleration, other than items identified in the company’s responses to the IRs in TQ10-001 and TQ10-002. In turn, Request 8 of the IR directed Toyota to provide copies of all documents related to each of those customer complaints.

Toyota has recently discovered that one of the customer complaints provided in the response to Request 8 was provided in an unreadable form. Toyota today is resubmitting that document in the folder “RQ10-003-IR08.”

4. Request 13 of the February 16, 2010 IR directed Toyota to provide a chronology of information and/or allegations related to the issue of unintended acceleration in subject vehicles manufactured for sale or lease in the United States, other than matters identified in the company’s responses to the IRs in TQ10-001 and TQ10-002, with a specific instruction to include every consumer complaint and field report (field technical report) that Toyota received on that subject. In addition, Request 14 directed Toyota to provide all documents related to that chronology. To refer to the consumer complaints and field reports that were recently identified, Toyota is providing a revised chronology in response to Request 13 in the folder “RQ 10-003-IR13” as “IR13_20110118_Supplemental.mdb.” Toyota is also providing the newly-identified documents in the folder “RQ10-003-IR14.”

5. Request 17 of the February 16, 2010 IR directed Toyota to provide a chronology of information and/or allegations related to the issue of unintended acceleration in subject vehicles manufactured for sale or lease outside the United States, other than matters identified in the company’s responses to the IRs in TQ10-001 and TQ10-002, with a specific instruction to include every consumer complaint and field report (field technical report) that Toyota received on that subject. In addition, Request 18 directed Toyota to provide all documents related to that chronology. Toyota has recently discovered that one of the customer complaints provided in the response to Request 18 was provided in an unreadable form. Toyota today is resubmitting that document in the folder “RQ10-003-IR18.”

6. Request 19 of the February 16, 2010 IR directed Toyota to provide information about each “action” undertaken by Toyota to investigate, analyze, or evaluate actual or alleged unintended acceleration, other than items identified in the company’s responses to the IRs in TQ10-001 and TQ10-002, and Request 20 directed Toyota to provide copies of all documents related to such “actions.” On the basis of an audit of custodial documents that were obtained from company officials, Toyota has identified a number of additional documents that appear to be responsive to this request. Toyota today is providing these documents in the folder “RQ10-003-IR20.”

7. Request 35 of the February 16, 2010 IR directed Toyota to describe all modifications or changes made by Toyota to the subject vehicles that may relate to actual or potential unintended acceleration, other than items identified in the company's responses to the IRs in TQ10-001 and TQ10-002. On the basis of an audit of custodial documents obtained from company officials, Toyota has identified one additional document that appears to be responsive to this request. Toyota today is providing that document in the folder "RQ10-003-IR35."

8. Request 43 of the February 16, 2010 IR directed Toyota to provide documents related to communications between Toyota employees in which the possibility of the existence of a problem or defect related to unintended acceleration was discussed, other than items identified in the company's responses to the IRs in TQ10-001 and TQ10-002. On the basis of an audit of custodial documents obtained from company officials, Toyota has identified a number of additional documents that appear to be responsive to this request. Toyota today is providing these documents in the folder "RQ10-003-IR43." In addition, Toyota has recently concluded that Market Impact Summaries (MIS) prepared by Toyota Motor Sales, Inc. (TMS) appear to fit within that request, since they are generally transmitted to TMC. Toyota today is providing copies of responsive MISs, also in the folder "RQ10-003-IR43."

9. Request 44 of the February 16, 2010 IR directed Toyota to provide documents related to communications or correspondence between Toyota and other persons or entities not identified in the response to Request 43 in which the possibility of the existence of a problem or defect related to unintended acceleration was discussed, other than items identified in the company's responses to the IRs in TQ10-001 and TQ10-002. On the basis of an audit of custodial documents obtained from company officials, Toyota has identified a number of additional documents that appear to be responsive to this request. Toyota today is providing these documents in the folder "RQ10-003-IR44."

Toyota has marked a number of documents in today's submission "confidential" in order to preserve the confidentiality of proprietary documents pending Toyota's completion of a review to identify which documents are entitled to confidential treatment under 49 CFR Part 512. Toyota will submit the required Part 512 justification and certificate, together with an index of confidential treatment claims, within the next 14 days.