

# TOYOTA

## TOYOTA MOTOR NORTH AMERICA, INC.

WASHINGTON OFFICE

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May 6, 2010

Mr. Richard Boyd  
Acting Director, Office of Defects Investigation  
Enforcement  
National Highway Traffic Safety Administration  
1200 New Jersey Avenue, SE  
Washington, DC 20590

Re: RQ10-003

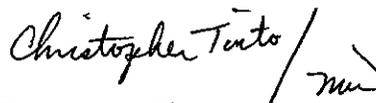
Dear Mr. Boyd:

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 additional information in response to the Information Request (IR) issued by the Office of Defects Investigation (ODI) on February 16, 2010 in the above-referenced proceeding.

The verifications provided with the previous submission continue to apply to this supplemental submission.

If you have any questions, 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

Enclosures

**TOYOTA'S SUPPLEMENTAL RESPONSE TO ODI'S INFORMATION  
REQUESTS IN RQ 10-003**

**REQUEST**

10. Describe in detail the search criteria used by Toyota to identify the claims identified in response to Information Request 9, 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 the alleged unintended acceleration in the Subject Vehicle(s). State, by make and model year, the terms of the new vehicle warranty coverage (including the subject 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.

**RESPONSE**

10. Additional warranty booklets for the remaining makes and models of subject vehicles for model years not provided in previous productions are provided by model and model year. These documents can be located by searching the IR field for documents like "10." This answer is complete to the best of Toyota's knowledge, and to the extent new information responsive to this request is identified, Toyota's response will be supplemented.

**REQUEST**

19. 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 actual or alleged unintended acceleration (collectively, "actions"), other than interference between the accelerator pedal and driver's side floor mat identified in your response to NHTSA's information requests in TQ10-001 and other than sticking accelerator pedals identified in your response to NHTSA's information requests in TQ10-002, 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. The Subset of Subject Vehicles that Toyota intended the action to involve;
- e. A brief summary of the subject and objective of the action;
- f. Engineering group(s)/supplier(s) responsible for designing and for conducting the action and

- g. A summary of the findings and/or conclusions resulting from the action.

**RESPONSE**

19. Toyota's response is based on the materials reviewed and located to date. Attached is an updated table summarizing the "actions" (as defined in this Request) that have been identified to date. This table can be found by searching the IR field for documents like "19." The updated chart is entitled "Attachment-Response19 ver4." To the extent Toyota identifies new information responsive to this Request, the response will be updated. Please note that some of the information in this table is confidential, and a request for confidential treatment will be submitted to the Office of Chief Counsel.

**REQUEST**

20. 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 interim, draft, or final form. Organize the documents chronologically by action.

**RESPONSE**

20. Additional documents related to the "actions" identified in the response to Request 19 that have been located and that were either originally in English or have been translated into English can be found by searching the IR field for documents like "20." The individual documents provided in this response are named according to the title shown in Attachment 19. Moreover, for translated documents in this supplement, where the original document written in Japanese is named (for example) "ACM10-0010988-j," the English translation is named "ACM10-0010988." Toyota may identify additional documents responsive to this request, and if additional documents are identified, it will supplement its response. 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.

**REQUEST**

35. Describe all modifications and/or changes considered and/or made by or on behalf of Toyota, from the start of production of Subject Vehicle(s) to the present, which relate to or may relate to actual or potential unintended acceleration, other than interference between the accelerator pedal and driver's side floor mate identified in your response to NHTSA's information requests in TQ 10-001 and other than sticking accelerator pedals identified in your response to NHTSA's information requests in TQ 10-002, in Subject Vehicle(s). For each such modification or change, provide the following information:

- a. A detailed description of the modification or change;
- b. The reason(s) for the modification or change;

- c. The subset of Subject Vehicles that Toyota intended the modification or change to affect;
- d. Whether the modification or change was implemented and if so when;
- e. The country in which Subject Vehicle(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;
- f. The original part numbers (service and engineering) and a description of the part;
- g. The part number of the modified or changed part (service and engineering) and a description of the part;
- h. Whether the original unmodified part was withdrawn from production and/or sale and if so, when;
- i. When the modified part was made available as a service part;
- j. Whether the modified part can be interchanged with an earlier production part;
- k. The date or approximate date on which the modification or change was incorporated into vehicle production; and
- l. 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 initial 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.

### **RESPONSE**

35. Additional custodial documents responsive to this Request have been identified and can be found by searching the IR field for documents like "35." This Request will be supplemented as additional responsive custodial files are identified.

### **REQUEST**

36. Describe in detail each and every electronic throttle control system Toyota has installed on Subject Vehicles. Include a description of the operation and functionality of the system, including any redundancies and/or checks built into the system, including but not limited to the closing of the throttle valve when the brakes are applied. Identify the vehicles (make, model, model year) that have had or have each such system, and identify those counties in which each subject vehicle was sold.

## RESPONSE

36. In 1998, TMC began installing the ETCS-i system in its U.S. models. The ETCS-i system was an improvement over the cable system it replaced because it eliminated cable binding and other types of mechanical failures. The ETCS-i system also provides the addition of a fail safe detection strategy that safely puts the vehicle into a limp-home mode or shuts the engine down in the event of an uncommanded or unintended acceleration. These fail safes were unavailable in vehicles that were equipped with the prior cable system. The ETCS-i system also allows for the incorporation of improved safety systems. For example, the ETCS-i makes it possible for Toyota to install vehicle stability control (VSC) and traction control systems on its vehicles. The ETCS-i also allows Toyota to manufacture more fuel efficient vehicles that meet or exceed ever changing emission standards.

The overall design of Toyota's ETCS-i system has remained substantially the same since its introduction. A chart listing all Toyota vehicles in the U.S. market that have been equipped with ETCS-i, including the years in which this technology was first introduced, is in a document titled "U.S. Vehicles With ETCS-i." This chart also includes details of the ETCS-i system such as whether a particular vehicle was equipped with resistive sensors or Hall effect sensors, or whether the systems were linked or linkless. Although the architecture and operation of the ETCS-i system has remained substantially the same, there are tuning differences in the ETCS-i systems between the various models, as each model is unique in its overall design. Toyota, like all vehicle manufacturers, assembles a wide variety of models of varying sizes and with differing engine and transmission requirements, and this makes it necessary to tune the ETCS-i system in each model vehicle in order to achieve optimal performance. In the event that the NHTSA considers the specific tuning to represent differences in the ETCS-i systems for purposes of this question, Toyota will provide charts outlining Engine Control Matrices and ETCS-i software changes relating to ETCSi-equipped models for model years 2000-2010. Documents identifying changes to the hardware and software by model year for the 4-cylinder and 6-cylinder MY 2002-2010 Camry have been identified and will be provided in a supplemental production.

Toyota has previously briefed the NHTSA on the fail safe strategy Toyota designed into its ETCS-i system as well as the redundancies. A Power Point presentation that explains the redundancies and fail safes in Toyota vehicles can be found by searching the IR field for documents like "36." The MY 2002-2006 Camry throttles do not close, as assumed in the question, when a driver depresses the brake pedal. Brake application alone is sufficient to stop the vehicle. Brake application does not close the throttle; movement of the accelerator pedal in the MY 2002-2006 Camry closes and opens the throttle depending on the movement of the accelerator. Like all vehicles without a brake override system, application of the brake does not by itself reduce the throttle angle. Toyota is still reviewing files to determine if FMEAs that are responsive to this question are available and, if any are located, they will be provided in a supplemental production.

Toyota is also in the process of identifying diagrams and parts descriptions that are responsive to this request and will produce these documents in a supplemental production. These documents include the following diagrams and parts descriptions: Parts location; System circuit diagram; Block diagram; ECM IO for MY 2007-2010 Camry V6 and L4; Gas Pedal vehicle applicable matrix for MY 2002-2010; Throttle body transition and applicable engine

matrix for MY 1997-2010 Camry and RAV4; and Transition of DTC code for MY 2002-2010 Camry. Additional documents responsive to this Request can be found by searching the IR field for documents like "36" or "37-40." 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.

### **REQUEST**

37. State in detail, beginning with Toyota's introduction of vehicles with electronic throttle controls in the United States, how Toyota protected against electromagnetic interference (EMI) and tested those protections.

### **RESPONSE**

37. Please see the response to Request 39. A chart detailing how Toyota has protected against electromagnetic interference and tested those protections can be found by searching the IR field for documents like "37." The chart is named "Attachment 37.xls." Supporting documents identified in the chart can also be located by searching the IR field for documents like "37," and the documents are named as they appear in the chart. Additional documents responsive to Request 37 can be located by searching the IR field for documents like "37-40." Toyota continues to search for documents responsive to Request 37 and additional documents will be supplemented as they are identified. 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.

### **REQUEST**

38. Describe in detail Toyota's programs, from the development of the initial electronic throttle control systems to the present, for testing Subject Vehicles for susceptibility to EMI and/or electromagnetic compatibility (EMC), including testing performed at any and all stages of vehicle and component design and development, including but not limited to the early electronic sub assembly (ESA) design stage (i.e., at the circuit board and component specifications level); testing design and/or specifications of component suppliers' ESAs; and testing the design, specifications, and/or performance of the assembled ESAs in a whole vehicle (including any and all static testing and dynamometer testing of the whole vehicle).

### **RESPONSE**

38. Please see the response to Request 39. Documents responsive to Request 38 can be found by searching the IR field for documents like "38" or "37-40." Toyota continues to search for documents responsive to Request 38 and additional documents will be supplemented as they are identified. 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.

## **REQUEST**

39. For each stage of Toyota's EMI/EMC susceptibility testing described in your response to the preceding information request, provide the following:

- a. For each and every test conducted by Toyota, by stage, provide the following:
  - i. Describe each test protocol in detail;
  - ii. Identify the subject component of the test and what effect, if any, that component has on the vehicle's electronic throttle control system;
  - iii. Provide a summary of Toyota's objective for each test;
  - iv. Identify what constitutes a passing/failing result for the test;
  - v. State whether the test is based fully or in substantial part on an existing SAE and/or ISO standard and, if so, identify the standard;
  - vi. For tests based on an existing SAE and/or ISO standard but not identical to the standard, identify the standard and describe in detail the difference(s) between the SAE and/or ISO standard and the test conducted by Toyota;
  - vii. Where applicable, provide a summary of Toyota's objective for conducting a test different from existing applicable SAE and/or ISO standard;
  - viii. If the test is on a whole vehicle (e.g., not a buck), state whether the test is static or performed with the vehicle on a dynamometer; and
  - ix. Provide a copy of any test report, results, notes, evaluations, conclusions, or other documents produced and/or related to this testing, and any and all conclusions drawn by Toyota therefrom.
- b. State in detail any and all conclusions Toyota has drawn regarding the testing described in Toyota's answer to the above as related to actual or potential unintended acceleration.

## **RESPONSE**

39. Requests 37-39 all address the issue of EMI and whether and how Toyota has designed its vehicles to protect against uncommanded throttle movement as a result of EMI. Accordingly, this response is meant to address Requests 37-39 collectively.

Toyota's ETCS-i system is designed so that it is not susceptible to external or internal disturbances and Toyota (like all manufacturers) confirms its design through component and

whole-vehicle EMI testing. Please refer to the Toyota Test Standards for EMI. Toyota's tests follow the ISO standards.

The ETCS-i is designed and tested to ensure that it withstands all of the foreseeable environments in terms of temperature, moisture, vibration, and electromagnetic interference. Toyota tests its vehicles both in the lab and in the field for both kinds of electromagnetic compatibility: namely, emissions (the energy that vehicles and their components *create*) and immunity (shielding vehicles from *incoming* energy from other electronics, power lines, radar, and broadcast antennas, etc.). Toyota does not progress onto whole vehicle-level testing until all component/system testing has been fully validated. Toyota has provided whole vehicle level and component test results with this response for the NHTSA's review.

Toyota has a robust design that protects against both internal and external electromagnetic interference. These design features include shielding, extensive filtering with filters and capacitors, redundant circuit design, error correcting system, memory mirroring, extensive fault detection and fail safe operation. In addition, Toyota employs dual CPUs with extensive validation logic. The design is verified through extensive testing at both the component level and at the vehicle level. In addition, Toyota is aware that Exponent has independently undertaken an extensive array of component and whole vehicle tests at multiple testing laboratories, with multiple vehicles over a range of intensities, and with both continuous wave and modulated wave with full vehicles and components. There has been no unintended speed increase in any of the testing performed by Toyota or Exponent. Toyota has provided these test reports in this response. Documents describing the representative EMI testing performed by TMC on components and on whole vehicles can be found by searching the IR field for documents like "39." Additional documents responsive to 39 can be found by searching the IR field for documents like "37-40." Toyota continues to search for documents responsive to Request 39 and additional documents will be supplemented as they are identified. 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.

The following describes the hardware techniques used by Toyota in its vehicles to provide immunity to EMI for the command signals from the accelerator pedal to the throttle motor. There is no Radio Frequency or wireless communication used, and all command signals are transmitted using copper conductors. The designed electrical circuits include the following:

1. Decoupling Capacitors

Low frequency, medium frequency, and high frequency decoupling capacitors are provided to improve noise immunity. The decoupling capacitors supply the transient current during switching and also suppress any electrical noise generated by other components. Low frequency decoupling capacitors are provided on the ECU. Medium frequency and high frequency decoupling capacitors are provided at the IC power supply terminals.

- a. Pedal Electronics

The pedal electronics has on-board decoupling capacitors to improve noise immunity. The CTS pedal circuit has an R-C network on the power supply terminals and a capacitor to

ground on the output terminal of each hall-effect sensor. The Denso pedal circuit has a capacitor to ground on the power supply terminal and at the output terminal of each hall-effect sensor.

b. ECU

The ECU has on-board low frequency decoupling capacitors for providing low frequency noise immunity for the ICs and other electrical circuits on the ECU circuit board. Multilayer structure that includes dedicated electrical source layer and ground layer. The ground layer contact to other layer's ground line through many via holes for stable electrical source to improve noise immunity.

c. Main CPU

The Main CPU uses decoupling capacitors to improve noise immunity.

d. Sub CPU

The Sub CPU uses decoupling capacitors to improve noise immunity.

e. Throttle Motor Driver IC

The throttle motor driver IC uses decoupling capacitors to improve noise immunity.

f. Throttle Electronics

The throttle electronics has on-board decoupling capacitors to improve noise immunity. The Denso throttle position sensor circuit has a capacitor to ground on the power supply terminal and at the output terminal of each hall-effect sensor.

2. Filter Network

A RC-filter network is used to provide increased noise immunity to the incoming signals to the ECU from the pedal sensors and the throttle position sensors. Pull-up and pull-down resistors are also used at the outputs of the sensors.

- a. The output signals from the pedal sensors, VPA and VPA2, each have a 39 k $\Omega$  pull down resistor on the ECU.
- b. Also, on the ECU, outputs VPA and VPA 2 are each connected to a 0.1  $\mu$ F – 10 k  $\Omega$  - 0.1  $\mu$ F (C-R-C) PI filter network for electrical noise immunity and to attenuate transient voltages that may appear on the connecting cables.
- c. The output signals from the throttle position sensors, VTA and VTA2, each have a 200 k  $\Omega$  pull up resistor on the ECU.
- d. Also, on the ECU, outputs VTA and VTA2 are connected to a 0.1  $\mu$ F – 10 k  $\Omega$  - 0.1  $\mu$ F (C-R-C) PI filter for electrical noise immunity and to attenuate transient voltages that may appear on the connecting cables.

3. Shielded Cable

A two-conductor, shielded cable is used for the throttle motor power conductors M+ and M- to attenuate electrical noise to adjacent conductors.

#### 4. Twisted Pair

The throttle position sensors are powered by a two-conductor twisted pair on the +5 Vdc and Ground for increased noise immunity to adjacent lines of other electrical sources.

This design strategy is verified with extensive component and vehicle testing.

#### REQUEST

40. Describe each and every modification to Toyota's testing program or procedures (or any part thereof) for testing Subject Vehicle(s) for susceptibility to EMI and/or EMC since Toyota first became aware of allegations of unintended acceleration on Subject Vehicles. If Toyota has modified its EMI/EMC susceptibility testing program, provide the following information for each modification:

- a. A detailed description of the modification;
- b. A summary of Toyota's objective for the modification, including the specific issue(s) the modification was intended to address;
- c. The date the modification was implemented;
- d. The subset of Subject Vehicles Toyota intended the modification to effect;
- e. A summary of the findings and/or conclusions resulting from the modification.
- f. Copies of all documents related to the modification regardless of whether the documents are in interim, draft, or final form.

#### RESPONSE

40. Documents responsive to this question can be found by searching the IR field for documents like "40." Additional documents responsive to 40 can be found by searching the IR field for documents like "37-40." If additional responsive documents are located, they will be supplemented as they are identified. 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.

#### REQUEST

41. Describe in detail all information in Toyota's possession regarding whether and the extent to which EMI has played a causal or contributory role in any incidents of unintended acceleration involving vehicles manufactured by Toyota, for sale or lease in the United States and/or for sale or lease outside of the United States. identify and describe the reason(s), if any, the Subject Vehicles manufactured for sale or lease in the United States may be less, or more, susceptible or vulnerable to EMI.

#### RESPONSE

41. Toyota has no information that any Electromagnetic Interference caused or contributed to any incident of alleged unintended acceleration in any of its vehicles. For documents responsive to this Request search the IR field for documents like "37-40." In addition, no claimant or counsel for any claimant has ever provided any scientific evidence that EMI caused unintended acceleration in any Toyota vehicle. Toyota continues to search for documents responsive to Request 41 and additional documents will be supplemented as they are identified. 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.

### **REQUEST**

42. Apart from interference between the accelerator pedal and driver's side floor mat identified in your response to NHTSA's information request in TQ 10-001, sticking accelerator pedals identified in your response to NHTSA's information requests in TQ 10-002, and any EMI problems described in your responses to the foregoing (above) information requests, describe in detail any other performance problems of which Toyota has information with regard to electronic throttle controls and whether those problems have led or, in Toyota's opinion, could lead to unintended acceleration.

### **RESPONSE**

42. Toyota has not identified any performance problems with regard to electronic throttle controls which have led, or in Toyota's opinion, could lead to unwanted vehicle acceleration of a sustained duration at a high speed. Based on information from the field, Toyota has identified over the years several discrete performance issues that are associated with customer reports of such things as "engine revs," or vehicle "lurches" or vehicle "surges," or similar descriptions. Toyota has identified the following categories of issues that are associated with many such reports: e.g.: miscellaneous transaxle/transmission issues that involve the electronic throttle briefly seeming to hesitate while searching for the right gear; miscellaneous air-fuel sensor issues that could produce a short-term sense of "surging" or "lurching;" shift flare issues addressed by TSB TC 005-07, surging issues addressed by TSB EG 017 02, and various reports attributable to consumer unfamiliarity with "drive-by-wire" or electronic throttle control performance in general, or to pedal misapplication. Field technical reports and other data illustrating these issues have been provided to NHTSA in a previous response to the IR.

### **REQUEST**

43. With regard to each and every communication or meeting (in person, or by telephone or by other electronic means) between and/or among Toyota employees in which the possibility of the existence of a problem or defect related to unintended acceleration, other than interference between the accelerator pedal and driver's side floor mat identified in your response to NHTSA's information requests in TQ 10-001 and other than sticking accelerator pedal identified in your response to NHTSA's information request in TQ 10-002, in Subject Vehicle(s) was discussed, state the approximate date on which such communication or meeting was held, 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.

**RESPONSE**

43. Additional custodial documents responsive to this request have been identified and can be found by searching the IR field for documents like "43." This Request will be supplemented as additional responsive documents and custodial files are identified.

**REQUEST**

44. 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 a problem or defect with the Subject Vehicle(s) related to unintended acceleration, other than interference between the accelerator pedal and driver's side floor mat identified in your response to NHTSA's information requests in TQ 10-001 and other than sticking accelerator pedal identified in your response to NHTSA's information request in TQ 10-002, in Subject Vehicle(s) was discussed, state the approximate date on which such communication, correspondence or notification was sent, identify the author and recipient, and provide a detailed summary for each. Identify and produce copies of any documents considered, reviewed, consulted, produced as a result, or otherwise used during each communication or meeting.

**RESPONSE**

44. Additional custodial documents responsive to this request have been identified and can be found by searching the IR field for documents like "44." This Request will be supplemented as additional responsive documents and custodial files are identified.

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May 6, 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: RQ10-003: Request for Extension of Time for  
Submission of Request for Confidential Treatment

Dear Mr. Vincent:

Today, Toyota Motor North America ("Toyota") is submitting additional information in response to the Information Request ("IR") in the above-referenced matter. The submission consists of well over a thousand pages of information, and the preparation of this submission coincided with Toyota's submission of other information to the agency and the preparation of requests for confidential treatment of prior submissions.

As a result of the substantial resources and time that had to be devoted to these efforts, Toyota has been unable to complete a separate review to identify the confidential information in today's submission and to prepare a request for confidential treatment pursuant to 49 C.F.R. Part 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 an eight-day extension of time, up to and including May 14, 2010, to submit a request for confidential treatment of the confidential business information in today's submission.

Because Toyota has not yet had the opportunity to review today's submission to determine the documents that contain confidential business information, Toyota has labeled most of the documents as "Confidential Business Information." When Toyota submits its request for confidential treatment, Toyota will not seek confidential treatment for documents that have not been marked as confidential in today's submission.<sup>1</sup>

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<sup>1</sup> With regard to the documents that Toyota has marked as containing confidential business information, it bears noting that most of them have a "Confidential Business Information" legend on the bottom, rather than the top, of each page. This is a result of the document management system used for the production, which permits the insertion of footers, but not headers.

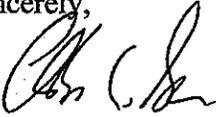
Mr. O. Kevin Vincent

May 6, 2010

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For the foregoing reasons, Toyota respectfully requests an eight-day extension of time, up to and including May 14, 2010, for the submission of a request for confidential treatment of portions of today's submission.

Sincerely,

A handwritten signature in black ink, appearing to read "Adam C. Sloane". The signature is stylized and cursive.

Adam C. Sloane

Enclosures

cc: Richard Boyd