

TOYOTA

TOYOTA MOTOR NORTH AMERICA, INC.

WASHINGTON OFFICE

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May 21, 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

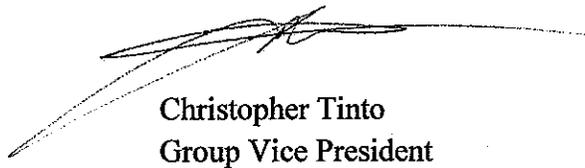
Dear Mr. Boyd:

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 MAY 21, 2010 SUPPLEMENTAL RESPONSE TO ODI'S
INFORMATION REQUEST IN RQ10-003**

REQUEST

3. Separately, by make, model and model year of Subject Vehicle manufactured for sale or lease in the United States, state the number of each of the following received by Toyota, or of which Toyota is otherwise aware, which relate to or may relate 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 TQ10-001 and other than sticking accelerator pedals identified in your response to NHTSA's information requests in TQ 10-002, in the Subject Vehicle(s):

- a. Consumer complaints, including those from fleet operators;
- b. Field reports, including dealer field reports;
- c. Reports, claims, or notices involving a crash/fire, injury, or fatality;
- d. Property damage claims (including the claimant's own vehicle);
- e. Third-party arbitration proceedings where Toyota is or was a party to the arbitration; and
- f. Lawsuits, both pending and closed, in which Toyota is or was a defendant or codefendant.

The scope of this information request includes all allegations and observations of 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 TQ10-001 and other than sticking accelerator pedals identified in your response to NHTSA's information requests in TQ10-002, in a Subject Vehicle by the owner of the vehicle, driver or passenger of the vehicle, person in a vehicle that was in a crash with a Subject Vehicle, or other person who was hit by a Subject Vehicle (e.g., a pedestrian) including the attorney or representative of such person, or in a field report or field technical report.

For subparts "a" through "d", state the total number of each item (e.g., consumer complaints, field reports, etc.) separately. Multiple incidents involving the same vehicle are to be counted separately. Multiple reports of the same incident are also to be counted separately (i.e., a consumer complaint and a field report involving the same incident in which a crash occurred are to be counted as a crash report, a field report, and a consumer complaint).

In addition, for subparts "d" through "f", provide a summary description of the alleged problem and causal and contributing factors and Toyota's assessment of the problem, with a summary of the significant underlying facts and evidence. For items "e" and "f", identify the parties to the action as well as the caption, court, docket number, and date on which the complaint or other document initiating the action was filed.

Provide the table in a Microsoft Excel 2003 (or a compatible format) file titled "MANUFACTURER REPORT COUNT—U.S."

RESPONSE

3. Toyota has identified additional reports responsive to this Request and has updated the counts for the number of reports that relate to or may relate to unintended acceleration in subject vehicles manufactured for sale or lease in the United States, other than those that clearly relate to interference between the accelerator pedal and driver's side floor mat identified in Toyota's response to NHTSA's information requests in TQ10-001 and other than those that clearly relate to sticking accelerator pedals identified in Toyota's response to NHTSA's information requests in TQ10-002. Toyota has updated these counts in Microsoft Excel 2003 format in the document entitled "MANUFACTURER REPORT COUNT—US_20100521Supplement.xls," stored in the folder entitled "Attachment 3_20100521Supplement." This answer is now complete to the best of Toyota's knowledge. If Toyota identifies additional responsive documents, it will supplement this response.

REQUEST

4. Separately, for each item (complaint, report, claim, notice, proceeding or lawsuit) within the scope of your response to Information Request 3, state the following information:

- a. Toyota's file number or other identifier used;
- b. The category of the item, as identified in Information Request 3 (i.e., consumer complaint, field report, etc.);
- c. Vehicle owner or fleet name (and fleet contact person), address, and telephone number;
- d. Vehicle's make, model and model year
- e. Vehicle's VIN;
- f. The name of the manufacturer, the Toyota part number, supplier, and supplier's part number, of the accelerator pedal installed on the vehicle;
- g. Whether the vehicle was equipped with a smart pedal or similar system;
- h. Vehicle's mileage at time of incident;
- i. Incident date (in "dd/mm/yyyy" date format);
- j. Report or claim date (in "dd/mm/yyyy" date format);
- k. Whether a crash is alleged;
- l. Whether property damage is alleged;

- m. Number of alleged injuries, if any;
- n. Number of alleged fatalities, if any;
- o. The assessment of a Toyota dealer of the actual or likely cause or factors contributing to the unintended acceleration (if there was no examination of the vehicle by a dealer, so state; if a dealer examined the vehicle and did not identify the actual or likely cause or factors contributing to the unintended acceleration, so state); and
- p. Toyota's assessment of the cause or factors contributing to the unintended acceleration (if Toyota has not and has never identified the actual or likely cause or factors contributing to the unintended acceleration, so state).

Provide this information in a Microsoft Access 2003 (or a compatible format) file titled "REQUEST NUMBER FOUR DATA—U.S."

RESPONSE

4. Toyota has identified additional information responsive to this Request in the document entitled "REQUEST NUMBER FOUR DATA - US_20100521Supplement.mdb," stored in the folder entitled "Attachment 4_20100521Supplement." As indicated in prior responses, with respect to Requests 4(o) and 4(p), except for the field reports, Toyota's records do not contain non-privileged assessments of actual or likely causes or factors contributing to the alleged unintended acceleration. For the field reports, to the extent available, Toyota has provided this information in the response to Request 13. This answer is now complete to the best of Toyota's knowledge. If Toyota identifies additional responsive documents, it will supplement this response.

REQUEST

5. Produce copies of all documents related to each item within the scope of Information Request 3. Organize the documents separately by category (i.e., consumer complaints, field reports, etc.) and in chronological order.

RESPONSE

5. Copies of additional documents responsive to this Request can be located by searching the IR field for documents like "5." This answer is now complete to the best of Toyota's knowledge. If Toyota identifies additional responsive documents, it will supplement this response.

REQUEST

6. Separately, by make, model and model year of Subject Vehicle and country where the Subject Vehicle was originally sold or leased (or otherwise transferred as a new vehicle from Toyota to a third party), state the number of each of the following received by Toyota, or of which Toyota is otherwise aware, which relate to or may relate to unintended acceleration, other

than sticking accelerator pedals identified in your response to NHTSA's information requests in TQ10-002, in the Subject Vehicle(s) manufactured for sale or lease outside of the United States:

- a. Consumer complaints, including those from fleet operators;
- b. Field reports, including dealer field reports;
- c. Reports, notices, or claims involving a crash/fire, injury, or fatality;
- d. Property damage claims (including to the claimant's own vehicle);
- e. Third-party arbitration proceedings where Toyota is or was a party to the arbitration; and
- f. Lawsuits, both pending and closed, in which Toyota is or was a defendant or codefendant.

The scope of this information request includes all allegations and observations of 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

TQ10-001 and other than sticking accelerator pedals identified in your response to NHTSA's information requests in TQ10-002, in a Subject Vehicle by the owner of the vehicle, driver or passenger of the vehicle, person in a vehicle that was in a crash with a Subject Vehicle, or other person who was hit by a Subject Vehicle (e.g., a pedestrian) including the attorney or representative of such person, or in a field report or field technical report.

For subparts "a" through "d", state the total number of each item (e.g., consumer complaints, field reports, etc.) separately. Multiple incidents involving the same vehicle are to be counted separately. Multiple reports of the same incident are also to be counted separately (i.e., a consumer complaint and a field report involving the same incident in which a crash occurred are to be counted as a crash report, a field report, and a consumer complaint).

In addition, for subparts "d" through "f", provide a summary description of the alleged problem and causal and contributing factors and Toyota's assessment of the problem, with a summary of the significant underlying facts and evidence. For items "e" and "f", identify the parties to the action as well as the caption, court, docket number, and date on which the complaint or other document initiating the action was filed.

Provide the table in a Microsoft Excel 2003 (or a compatible format) file titled "MANUFACTURER REPORT COUNT—OUTSIDE US."

RESPONSE

6. Toyota has identified additional reports responsive to this Request and has updated the counts for the number of reports that relate to or may relate to unintended acceleration in subject vehicles manufactured for sale or lease in outside the United States, other than those that clearly relate to interference between the accelerator pedal and driver's side floor

mat identified in Toyota's response to NHTSA's information requests in TQ10-001 and other than those that clearly relate to sticking accelerator pedals identified in Toyota's response to NHTSA's information requests in TQ10-002. Toyota updated the counts in Microsoft Excel 2003 format in the document entitled "MANUFACTURER REPORT COUNT— OUTSIDE US_20100521Supplement.xls," stored in the folder entitled "Attachment 6_20100521Supplement." This answer is now complete to the best of Toyota's knowledge. If Toyota identifies additional responsive documents, it will supplement this response.

REQUEST

7. Separately, for each item (complaint, report, claim, notice, proceeding or lawsuit) within the scope of your response to Information Request 6, state the following information:

- a. Toyota's file number or other identifier used;
- b. The category of the item, as identified in Information Request 6 (i.e., consumer complaint, field report, etc.);
- c. Vehicle owner or fleet name (and fleet contact person); address, and telephone number;
- d. Vehicle's make, model and model year and country where subject vehicle was originally sold or leased (or otherwise transferred as a new vehicle from Toyota to a third party);
- e. Vehicle's VIN;
- f. The name of the manufacturer, the Toyota part number, supplier, and supplier's part number, of the accelerator pedal installed on the vehicle;
- g. Whether the vehicle was equipped with a smart pedal or similar system;
- h. Vehicle's mileage at time of incident;
- i. Incident date (in "dd/mm/yyyy" date format);
- j. Report or claim date (in "dd/mm/yyyy" date format);
- k. Whether a crash is alleged;
- l. Whether property damage is alleged;
- m. Number of alleged injuries, if any;
- n. Number of alleged fatalities, if any;
- o. The assessment of a Toyota dealer of the actual or likely cause or factors contributing to the unintended acceleration (if there was no examination of the vehicle by a dealer, so state; if a dealer examined the vehicle and did not identify

the actual or likely cause or factors contributing to the unintended acceleration, so state); and

- p. Toyota's assessment of the cause or factors contributing to the unintended acceleration (if Toyota has not and has never identified the actual or likely cause or factors contributing to the unintended acceleration, so state).

Provide this information in a Microsoft Access 2003 (or a compatible format) file titled "REQUEST NUMBER SEVEN DATA—OUTSIDE U.S."

RESPONSE

7. Toyota has identified additional information responsive to this Request in the document entitled "REQUEST NUMBER SEVEN DATA – OUTSIDE US_20100521Supplement.mdb," stored in the folder entitled "Attachment 7_20100521Supplement." As indicated in prior responses, with respect to Requests 7(o) and 7(p), except for the field reports, Toyota's records do not contain non-privileged assessments of actual or likely causes or factors contributing to the alleged unintended acceleration. For the field reports, additional assessments, to the extent available, have been provided in the response to Request 17. The customer complaints and corresponding summaries will be provided in response to Request 17, after they have been translated. Notwithstanding the customer complaints, this answer is now complete to the best of Toyota's knowledge. If Toyota identifies additional responsive documents, it will supplement this response.

REQUEST

8. Produce copies of all documents related to each item within the scope of Information Request 6. Organize the documents separately by category (i.e., consumer complaints, field reports, etc.) and in chronological order.

RESPONSE

8. Copies of documents responsive to this Request can be located by searching the IR field for documents like "8." Please note that the customer complaints are in the process of translation, and Toyota will provide complaints and their corresponding summaries once the translations are complete. Aside from the untranslated customer complaints, this answer is now complete to the best of Toyota's knowledge. If Toyota identifies additional responsive documents, it will supplement this response.

REQUEST

13. State in detail, in chronological order, all information and/or allegations related to the issue(s) of 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 TQ10-001 and other than sticking accelerator pedals identified in your response to NHTSA's information requests in TQ10-002, in Subject Vehicle(s) manufactured for sale or lease in the United States from the time Toyota first became aware of the issue of unintended acceleration in any of these Subject Vehicles to the present. This detailed chronology shall include the date of

the incident, the date(s) Toyota received the information and/or allegations related to the issue(s) of unintended acceleration, an identification of the vehicle (make, model, model year, VIN, and owner's name), a summary of the information and allegations, a statement of all reasons why Toyota has not included the incident as being caused or contributed to by interference between the accelerator pedal and driver's side floor mat or by a sticking pedal, and a statement of

Toyota's belief as to the cause or contributing factors of the unintended acceleration. In this chronology, include each and every complaint and field report (field technical report) that Toyota received 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 TQ10-001 and other than sticking accelerator pedals identified in your response to NHTSA's information requests in TQ10-002.

RESPONSE

13. Toyota has identified additional Field Technical Reports responsive to this Request. The updated list and the Field Technical Report summaries are in the folder "Attachment 13_20100521Supplement" as "ATTACHMENT 13_20100521Supplement.mdb." This answer is now complete to the best of Toyota's knowledge. If Toyota identifies additional responsive documents, it will supplement this response.

REQUEST

14. Produce, in chronological order, all documents related to the chronology provided in your response to the immediately above information request.

RESPONSE

14. The additional documents identified as responsive to this Request can be found by searching for documents like "14." This answer is now complete to the best of Toyota's knowledge. If Toyota identifies additional responsive documents, it will supplement this response.

REQUEST

17. State in detail, in chronological order, all information and/or allegations related to the issue(s) of 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 TQ10-001 and other than sticking accelerator pedals identified in your response to NHTSA's information requests in TQ10-002, in Subject Vehicle(s) manufactured for sale or lease in a country other than the United States, from the time Toyota first became aware of the issue of unintended acceleration in any of these Subject Vehicles to the present. This detailed chronology shall include the date of the incident, the date(s) Toyota (including a subsidiary or other business entity controlled by Toyota and located in a foreign country) received the information and/or allegations related to the issue(s) of unintended acceleration, an identification of the vehicle (Make, model, model year and VIN if available and owner's name), a summary of the information and allegations, a statement of all reasons why Toyota has not included the incident as being caused or contributed to by interference between the accelerator pedal and driver's side

floor mat or by a sticking pedal, and a statement of Toyota's belief as the cause or contributing factors to the unintended acceleration. In this chronology, include each and every complaint and field report (field technical report) that Toyota (including a subsidiary or other business entity controlled by Toyota and located in a foreign country) received 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 TQ10-001 and other than sticking accelerator pedals identified in your response to NHTSA's information requests in TQ10-002.

RESPONSE

17. Toyota has identified additional field technical reports responsive to this Request. The updated list and field technical report summaries are in the folder entitled "Attachment 17_20100521Supplement" as "ATTACHMENT 17_20100521Supplement.mdb." When the consumer complaints have been translated, Toyota will supplement this response. Aside from the untranslated customer complaints, this answer is now complete to the best of Toyota's knowledge. If Toyota identifies additional responsive documents, it will supplement this response.

REQUEST

18. Produce, in chronological order, all documents related to the chronology provided in your response to the immediately above information request.

RESPONSE

18. Documents identified as responsive to this Request can be found by searching documents like "18." Please note that the untranslated customer complaints have not been included in this response. Toyota will provide the customer complaints and their summaries after the documents have been translated. Aside from the untranslated customer complaints, this answer is now complete to the best of Toyota's knowledge. If Toyota identifies additional responsive documents, it will supplement this response.

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. Documents previously submitted to House Committee on Energy and Commerce that contain information responsive to this Request are provided in this response and can be found by searching the IR field for documents like "37-40." Please note that many of these documents contain confidential information and have been marked accordingly. A request for confidential treatments has been submitted to the Office of Chief Counsel. This answer is now complete to the best of Toyota's knowledge. If Toyota identifies additional responsive documents, it will supplement this response.

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May 21, 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 Confidential Treatment

Dear Mr. Vincent:

Today, Toyota Motor North America ("TMA"), on behalf of Toyota Motor Corporation and its subsidiaries and affiliates (collectively referred to as "Toyota"), is submitting further information in response to the Information Request in the above-referenced matter. Because the submission includes confidential business information that, if disclosed, would cause substantial harm to Toyota's competitive position, Toyota is submitting the information through your office and is hereby requesting that it be accorded confidential pursuant to 49 C.F.R. Part 512 and Exemption 4 of the Freedom of Information Act ("FOIA"), 5 U.S.C. § 552(b)(4).

A. Description of the Information (49 C.F.R. § 512.8(a))

The confidential business information consists of testing documents and performance evaluation engineering reports responsive to requests 37-40 of the above referenced Information Report. The information is marked with a Confidential Business Information legend and appears in Bates ranges TOY-RQ-00126583 to TOY-RQ-00127280, with the translations of those documents appearing at TOY-RQ-00126601T-0001 to TOY-RQ-00127280T-0008 in the enclosed disks.¹

B. Confidentiality Standard (49 C.F.R. § 512.8(b))

This submission is subject to the substantial-competitive-harm standard (49 C.F.R. § 512.15(b)).

¹ As we have noted in previous submissions in this matter, the documents have a confidential business information legend on the *bottom* of the pages of the submission, rather than at the top. Such documents generally were produced electronically out of Ringtail® Legal™ software, and the production printer within that software facilitates the insertion of footers, but not headers.

Mr. O. Kevin Vincent
May 21, 2010
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C. Justification for Confidential Treatment (49 C.F.R. § 512.8(c))

Part 512 and FOIA Exemption 4 protect the confidentiality of information that, if disclosed, would be likely to cause substantial competitive harm to the submitter. *See* 49 C.F.R. § 512.15(b); *see also, e.g., Nat'l Parks & Conservation Ass'n v. Morton*, 498 F.2d 765, 770 (D.C. Cir. 1974). Under FOIA Exemption 4, a submitter need not establish a certainty that competitive harm will result from a disclosure. Rather, a submitter need establish only that competitive harm is a *likely* result of a disclosure. *See, e.g., Judicial Watch, Inc. v. Export-Import Bank*, 108 F. Supp. 2d 19, 29 (D.D.C. 2000).

FOIA Exemption 4 was enacted to prevent disclosures that would “eliminate much of the time and effort that would otherwise be required to bring to market a product competitive with the [submitter’s] product.” *Public Citizen Health Research Grp. v. FDA*, 185 F.3d 898, 905 (D.C. Cir. 1999). “Because competition in business turns on the relative costs and opportunities faced by members of the same industry, there is a potential windfall for competitors to whom valuable information is released under FOIA. If those competitors are charged only minimal FOIA retrieval costs for the information, rather than the considerable costs of private reproduction, they may be getting quite a bargain. Such bargains could easily have competitive consequences not contemplated as part of FOIA’s principal aim of promoting openness in government.” *Worthington Compressors, Inc. v. Costle*, 662 F.2d 45, 51 (D.C. Cir. 1981).

In addition, courts have recognized that Exemption 4 may be invoked to prevent the substantial competitive harm that can be expected from disclosures that would inform competitors about a firm’s “operational strengths and weaknesses.” *See Nat'l Parks & Conservation Ass'n v. Kleppe*, 547 F.2d 673, 684 (D.C. Cir. 1976); *People for the Ethical Treatment of Animals v. U.S. Dep't of Agric.*, No. Civ-03 C 195-SBC, 2005 WL 1241141, at *7 (D.D.C. May 24, 2005).

The confidential business information includes test reports and results. This information reveals the procedures used by Toyota and several of its suppliers in various kinds of tests, particularly in reliability testing. The testing expertise reflected in these materials is the result of substantial investments of time, money, and effort in developing test processes and testing and design expertise. The disclosure of the information would give competitors insights into the nature and scope of Toyota’s analyses and testing, the specific proprietary test procedures used by Toyota and its suppliers, and the capabilities of Toyota and its suppliers in these matters. Such information would enable competitors to benchmark and improve their own testing regimes, without investing the time and money involved in independent development of test processes and approaches. In addition, the release of such information would provide invaluable insights into the performance of specific designs and components—information that could be independently developed only with great difficulty and at substantial expense. Thus, the disclosure of the information would provide the kind of windfall to competitors that FOIA Exemption 4 was enacted to prevent. *See Worthington Compressors*, 662 F.2d at 51. The information also qualifies for confidential treatment because it would reveal valuable information about Toyota’s operational capacities. *See Kleppe*, 547 F.2d at 684; *People for the Ethical Treatment of Animals*, No. Civ-03 C 195-SBC, 2005 WL 1241141, at *7.

Mr. O. Kevin Vincent
May 21, 2010
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The information at issue here also includes product evaluation and performance-related engineering reports. This information reveals valuable information about Toyota's designs, design and engineering specifications, product evaluation processes, and design philosophy. Such information could enable competitors to evaluate and, in some cases, replicate Toyota's product evaluation processes, as well as Toyota's designs, at a fraction of the cost required for independent development of such information. The information also would provide competitively valuable insights into Toyota's operational capacities. Because product and performance evaluation analyses are a critical aspect of motor vehicle manufacturing, the release of such information would be a boon to competitors, providing them insights into areas in which they need to develop and improve their own engineering capacities and giving them a roadmap for doing so. Accordingly, the release of the information would facilitate efforts to compete against Toyota, causing Toyota substantial competitive harm.

D. Class Determination (49 C.F.R. § 512.8(d))

None of this information is subject to a class determination.

E. Duration For Which Confidential Treatment Is Sought (49 C.F.R. § 512.8(e))

Because the information will retain its competitive value indefinitely, Toyota requests that the information be accorded confidential treatment permanently.

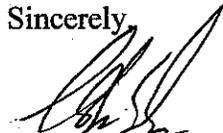
F. Contact Information (49 C.F.R. § 512.8(f))

Please direct all inquiries to the undersigned.

* * *

Certificates in support of confidentiality executed on behalf of Toyota, DENSO, and CTS are attached. If you receive a request for disclosure of the information for which confidential treatment is sought before you have completed your review of this request, Toyota respectfully requests notification of the request and an opportunity to provide further justification for confidential treatment, if warranted.

Sincerely



Adam C. Sloane

Enclosures

Certificate in Support of Request for Confidentiality

I, Kevin S. Ro, pursuant to the provisions of 49 C.F.R. Part 512, state as follows:

- (1) I am National Manager and I am authorized by Toyota Motor North America, Inc. ("Toyota") to execute documents on its behalf;
- (2) I certify that the information described in the attached document is confidential and proprietary data and is being submitted with the claim that it is entitled to confidential treatment under 5 U.S.C. 552(b)(4);
- (3) I hereby request that the information contained in the pertinent documents be protected on a permanent basis;
- (4) This certification is based on the information provided by the responsible Toyota personnel who have authority in the normal course of business to release the information for which a claim of confidentiality has been made to ascertain whether such information has ever been released outside Toyota;
- (5) Based upon that information, to the best of my knowledge, information and belief, the information for which Toyota has claimed confidential treatment has never been released or become available outside Toyota, except for disclosures to suppliers and contractors who were provided the information with the understanding that such information must be maintained in strict confidence, and except for required disclosures that may have been made in connection with Congressional investigations, which were accompanied by requests for confidential treatment;
- (6) I make no representations beyond those contained in this certificate and, in particular, I make no representations as to whether this information may become available outside Toyota because of unauthorized or inadvertent disclosure (except as stated in paragraph 5); and
- (7) I certify under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on this 21st day of May, 2010



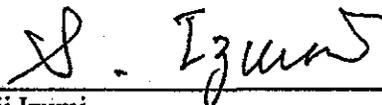
Kevin S. Ro
National Manager
Toyota Motor North America, Inc.

Certificate in Support of Request for Confidentiality

I, Shoji Izumi, pursuant to the provisions of 49 C.F.R. Part 512, state as follows:

- (1) I am General Manager, Electronics Engineering Department 1, and I am authorized by DENSO Corporation to execute documents on its behalf;
- (2) I certify that the information described in the attached request for confidential treatment is confidential and proprietary data and is being submitted with the claim that it is entitled to confidential treatment under 5 U.S.C. 552(b)(4);
- (3) I hereby request that the information contained in the pertinent documents be protected on a permanent basis;
- (4) This certification is based on the information provided by the responsible DENSO personnel who have authority in the normal course of business to release the information for which a claim of confidentiality has been made to ascertain whether such information has ever been released outside DENSO;
- (5) Based upon that information, to the best of my knowledge, information and belief, the information for which DENSO has claimed confidential treatment has never been released or become available outside DENSO, except for limited disclosures that may have been made to representatives of Toyota, which were made with the understanding that such information must be maintained in strict confidence;
- (6) I make no representations beyond those contained in this certificate and, in particular, I make no representations as to whether this information may become available outside DENSO because of unauthorized or inadvertent disclosure (except as stated in paragraph 5); and
- (7) I certify under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on this 21th day of May, 2010



Shoji Izumi
General Manager, Electronics Engineering Department 1

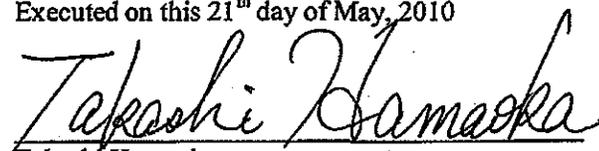
DENSO Corporation

Certificate in Support of Request for Confidentiality

I, Shoji Izumi, pursuant to the provisions of 49 C.F.R. Part 512, state as follows:

- (1) I am General Manager, System Control Components Engineering Department 3, and I am authorized by DENSO Corporation to execute documents on its behalf;
- (2) I certify that the information described in the attached request for confidential treatment is confidential and proprietary data and is being submitted with the claim that it is entitled to confidential treatment under 5 U.S.C. 552(b)(4);
- (3) I hereby request that the information contained in the pertinent documents be protected on a permanent basis;
- (4) This certification is based on the information provided by the responsible DENSO personnel who have authority in the normal course of business to release the information for which a claim of confidentiality has been made to ascertain whether such information has ever been released outside DENSO;
- (5) Based upon that information, to the best of my knowledge, information and belief, the information for which DENSO has claimed confidential treatment has never been released or become available outside DENSO, except for limited disclosures that may have been made to representatives of Toyota, which were made with the understanding that such information must be maintained in strict confidence;
- (6) I make no representations beyond those contained in this certificate and, in particular, I make no representations as to whether this information may become available outside DENSO because of unauthorized or inadvertent disclosure (except as stated in paragraph 5); and
- (7) I certify under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on this 21st day of May, 2010



Takashi Hamaoka

General Manager, System Control Components Engineering Department 3

DENSO Corporation

CERTIFICATE IN SUPPORT OF REQUEST FOR CONFIDENTIALITY

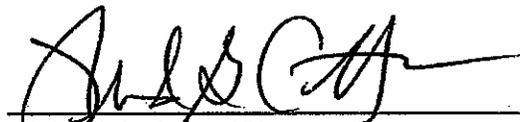
I, Richard G. Cutter III, pursuant to the provisions of 49 C.F.R. Part 512, state as follows:

- (1) I am the Vice President, General Counsel and Secretary of CTS Corporation and I am authorized by CTS Corporation to execute documents on its behalf;
- (2) I certify that the information contained in the documents listed below is confidential and proprietary data and is being submitted with the claim that it is entitled to confidential treatment under 5 U.S.C. 552(b)(4):

Engineering Test Report No. 35798-01: Electromagnetic Compatibility Tests on a Model 180 L Accelerator Pedal (Testing on October 25-28, 2005)

CTS Test Engineering Report, Report No. 2.2.22 ESD, Log No. 12793, December 18, 2003, Revised March 4, 2004.
- (3) I hereby request that the information contained in the indicated documents be protected on a permanent basis;
- (4) This certification is based on the information provided by the responsible CTS Corporation personnel who have authority in the normal course of business to release the information for which a claim of confidentiality has been made to ascertain whether such information has ever been released outside CTS Corporation;
- (5) Based upon that information, to the best of my knowledge, information and belief, the information for which CTS Corporation has claimed confidential treatment has never been released or become available outside CTS Corporation, except for disclosures to manufacturers who are customers of CTS Corporation and who were provided the information with the understanding that such information must be maintained in strict confidence;
- (6) I make no representations beyond those contained in this certificate and, in particular, I make no representations as to whether this information may become available outside CTS Corporation because of unauthorized or inadvertent disclosure (except as stated in paragraph 5); and
- (7) I certify under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on this 21st day of May, 2010



Richard G. Cutter III
Vice President, General Counsel and Secretary
CTS Corporation