

Toyota Motor Engineering &  
Manufacturing North America, Inc.

Vehicle Safety & Compliance  
Liaison Office  
19001 South Western Avenue  
Torrance, CA 90501

June 16, 2015

Mr. Frank S. Borris II  
Acting Associate Administrator for Enforcement  
National Highway Traffic Safety Administration  
Attn: Recall Management Division (NVS-210)  
1200 New Jersey Ave, SE  
Washington, D.C. 20590

Re: Recall 15V-285 (originally 14V-312 and 13V-133)  
Certain Toyota Vehicle Front Passenger Airbags  
Part 573, Amended Defect Information Report

Dear Mr. Borris:

As discussed with the agency, Toyota is submitting the attached Amended Defect Information Report in response to the Takata Defect Information Reports and Consent Order recently filed.

Should you have any questions about this report, please contact me directly.

Sincerely,



Abbas Saadat

Vice President

Toyota Motor Engineering & Manufacturing  
North America, Inc.

cc: J. Timian

## AMENDED DEFECT INFORMATION REPORT (15V-285)

1. Vehicle Manufacturer Name:

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

Toyota Motor Manufacturing Canada Inc. ["TMMC"]  
1055 Fountain Street North, Cambridge, Ontario, Canada N3H 5K2

Toyota Motor Manufacturing, Indiana, Inc. ["TMMI"]  
4000 Tulip Tree Dr., Princeton, IN 47670-4000

New United Motor Manufacturing, Inc. ["NUMMI"]  
45500 Fremont Boulevard, Fremont, CA 94538-6368

Affiliated U.S. Sales Company

Toyota Motor Sales, USA, Inc. ["TMS"]  
19001 South Western Avenue, Torrance, CA 90501

General Motors Corporation Global Headquarters ["GM"]  
100 Renaissance Center Drive, P. O. Box 100 Detroit, MI 48265

Manufacturer of Front Passenger Air Bag:

TK HOLDINGS INC. ("Takata")  
2500 Takata Drive, Auburn Hills, MI 48326  
Phone: 248-373-2897

Country of Origin: U.S. and Mexico

2. Identification of Involved Vehicles:

Make/ Car Line	Model Year	Manufac- turer	VIN		Production Period
			VDS	VIS	
Lexus/ SC	2002 thru 2007	TMC	FN4#Y	20001059 – 20035548 30035116 – 30049192 40047995 – 40061283 50061048 – 50072002 61000010 – 61000016 69000006 – 69010145 79010058 – 79016190	January 8, 2001 through August 6, 2007
Toyota/ Corolla	2003 thru 2007	TMC	B#3#E	30002008 – 30051593 32000000 – 32016853 40051487 – 40053026 42016856 – 42048916 50053035 – 50057415 52048918 – 52067857 60057243 – 60100018 70098045 – 70137750	December 17, 2001 through July 4, 2007
		TMMC		3C000082 – 3C778027 4C165645 – 4C815358 5C316595 – 5C558528 6C550096 – 6C712369 7C712380 – 7C855684	
		NUMMI		3Z000004 – 3Z190443 4Z190447 – 4Z342398 5Z342399 – 5Z568020 6Z568021 – 6Z764641 7Z764644 – 7Z936910	
Toyota/ Corolla Matrix	2003 thru 2007	TMMC	##3#E	3C000083 – 3C776114 4C163607 – 4C318778 5C316289 – 5C554039 6C550061 – 6C624057 7C622774 – 7C686144	December 17, 2001 through June 4, 2007
Toyota/ Sequoia	2002 thru 2007	TMMI	#T##A	2S105332 – 2S137483 3S100034 – 3S205190 4S205112 – 4S238604 5S220450 – 5S264297 6S248962 – 6S284270 7S277179 – 7S299608	April 2, 2002 through November 8, 2007
Toyota/ Tundra	2003 thru 2006	TMMI	####1	3S306031 – 3S439732 4S002453 – 4S466455 5S442174 – 5S501952 6S451343 – 6S562569	May 24, 2002 through December 22, 2006
Pontiac/ Vibe	2003 thru 2007	NUMMI	S#5##	3Z400001 – 3Z484274 4Z400001 – 4Z471857 5Z400043 – 5Z484067 6Z400041 – 6Z464959 7Z400002 – 7Z443382	January 18, 2003 through June 6, 2007

NOTE: (1) The above referenced vehicles include those covered by previous recall 14V-312 and the additional population reported here. A small number of Toyota vehicles received replacement inflators as part of previous recall 13V-133. These vehicles are not included.

(2) Although the involved vehicles are within the above VIN range, not all vehicles in this range were sold in the U.S.

3. Total Number of Vehicles Potentially Involved:

This amendment expands the number of affected Toyota vehicles by 1,142,890 and the number of affected General Motors vehicles by 127,578.

The total number of involved Toyota vehicles beginning with the initiation of previous recall 14V-312 to date is now 1,776,378. This is the total number of Toyota vehicles covered by 14V-312 and the additional population noted above. All further quarterly reporting to NHTSA pursuant to this report will refer to 15V-285; all further quarterly reporting pursuant to the associated recall 15V-286, which is the prioritized population of vehicles in areas of High Absolute Humidity (HAH), will be reported separately. A small number of Toyota vehicles received replacement inflators as part of previous recall 13V-133. These vehicles are not included.

The total number of General Motors Vibe vehicles beginning with the initiation of previous recall 14V-312 to date is now 197,090. This is the total number of Vibe vehicles covered by 14V-312 and the additional population noted above. All further quarterly reporting to NHTSA pursuant to this report will refer to 15V-285; all further quarterly reporting pursuant to the associated recall 15V-286, which is the prioritized population of vehicles in areas of High Absolute Humidity (HAH), will be reported separately. A small number of Vibe vehicles received replacement inflators as part of previous recall 13V-133. These vehicles are not included.

The total number of all potentially involved vehicles beginning with the initiation of previous recall 14V-312 to date is now 1,973,468.

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

See Takata's Part 573 Reports.

5. Description of Problem:

This is an amendment to Recall 15V-285 in light of the Consent Order entered into on May 18, 2015 between the National Highway Traffic Safety Administration (“NHTSA”) and Takata, and Part 573 Reports filed by Takata on that date (15E-041, 15E-042, and 15E-043). The subject vehicles are equipped with front passenger air bag inflators (Takata-designated SPI, PSPI, or PSPI-L) which, according to the Part 573 Reports submitted by Takata, may have been manufactured in such a way as to have a potential for the intrusion of moisture over time. Depending on the circumstances, this potential condition could create excessive internal pressure when the air bag is deployed, which could result in the body of the inflator rupturing upon deployment. In the event of an inflator rupture, metal fragments could pass through the air bag cushion material, which may result in injury or death to vehicle occupants.

6. Chronology of Principal Events:

April 11, 2013

Toyota submitted a Part 573 report to the National Highway Traffic Safety Administration (NHTSA). NHTSA assigned recall number 13V-133 to this action.

June 10, 2014

Toyota notified the agency of a change to the remedy procedure for 13V-133. NHTSA assigned recall number 14V-312 to this remedy change.

May 13, 2015

Toyota reported to NHTSA that it decided to expand the coverage of 14V-312 to include any vehicle equipped with a Takata-designated SPI front passenger inflator that had not been previously included in the recall. NHTSA assigned recall number 15V-285 to this expansion.

May 19, 2015

The Secretary of the Department of Transportation announced that Takata entered into a Consent Order with NHTSA and that Takata filed Part 573 Reports related to Takata-designated SPI, PSPI, and PSPI-L front passenger inflators. Such inflators are used in the vehicles identified in Section 2, above.

May 20, 2015

Toyota met with representatives of NHTSA’s Office of Defects Investigation explaining that, based on its initial understanding of Paragraph 9 of the Consent Order and the remedy program section of certain of the Takata Part 573 Reports, the May 13 expansion of 14V-312 covered all affected vehicles, and no further action was required for 14V-312. It also understood that

some vehicles covered by 14V-312 were located in the prioritized areas of High Absolute Humidity (HAH) and would be transferred to 14V-655 for the purpose of recall completion tracking. In addition, Toyota indicated that it would modify the previous agreement with the agency on what constituted the HAH areas, particularly along the Gulf Coast, to be consistent with the Consent Order. In response to ODI staff's request, Toyota confirmed these discussions in a letter dated May 26, 2015.

#### May 29 – June 11, 2015

In further discussions, NHTSA clarified the intent of the scope of the recall population and remedy program set forth in the Takata Part 573 Reports and the Consent Order. In particular, the agency clarified its interpretation of the remedy program agreed to by Takata.

#### June 12, 2015

Based on the additional discussions with the agency, Toyota decided to amend 15V-285. In doing so, Toyota does not endorse or fully adopt the content of Takata's Part 573 Reports.

#### 7. Description of Corrective Repair Action:

All known owners of the affected Toyota and Lexus vehicles will be notified by first class mail to return their vehicles to a Toyota or Lexus dealer, as applicable. The dealer will replace the front passenger airbag inflator with a newly manufactured one.

General Motors will notify NHTSA separately of its repair and notification schedule.

In addition, see Section 8, below.

#### Reimbursement Plan for pre-notification remedies

The owner letter will instruct vehicle owners who have paid to have this condition remedied prior to this campaign to seek reimbursement pursuant to Toyota's General Reimbursement Plan.

#### Reimbursement Plan for pre-notification remedies for General Motors Vehicles (Pontiac Vibe)

Pursuant to 577.11(e), General Motors will provide reimbursement to owners for repairs completed on or before ten days after GM mails owner letters, pursuant to the plan submitted on May 20, 2015.

8. Recall Schedule:

On June 5, 2015, NHTSA published a Notice of Coordinated Remedy Program Proceeding for the Replacement of Certain Takata Air bag Inflators (80 *Fed. Reg.* 32197). The agency indicates that it intends to gather information and seek comment on a program to prioritize, organize, and phase multiple recalls being conducted by various manufacturers, including Toyota.

In addition, certain of Takata's Part 573 Reports discuss the remedy program as follows:

“Consistent with paragraphs 4 and 9 of the Consent Order, this Report recommends and contemplates that the remedy program for the subject inflators is to use a phased customer notification and remedy approach. Under that approach, Takata plans to work with the manufacturers of the vehicles in which the subject inflators were installed to implement appropriate recalls to replace the subject inflators first in high absolute humidity States, with any further expansion of the remedy program to proceed by geographic zones, contingent on subsequent orders that may be issued by NHTSA based on the results of further testing and engineering analysis of the subject inflators and following consultation with Takata and the affected vehicle manufacturers, as follows:

- The initial recall contemplated by this Report and the Consent Order would include the vehicle models listed in section 2 that were sold in or ever registered in any part of Florida, Puerto Rico, the U.S. Virgin Islands, Hawaii, the Outlying U.S. Territories, Texas, Louisiana, Georgia, South Carolina, Alabama, and Mississippi;
- Pursuant to the Consent Order, if ordered by NHTSA based on the result of further testing and engineering analysis of the subject inflators and following consultation with Takata and the affected vehicle manufacturers, the recall contemplated by this Report and the Consent Order would expand to include the vehicle models listed in section 2 that were sold in or ever registered in any part of California, Oklahoma, North Carolina, Virginia, Arkansas, Kentucky, Tennessee, Illinois, Delaware, Maryland, and Missouri;
- Pursuant to the Consent Order, if ordered by NHTSA based on the results of further testing and engineering analysis of the subject inflators and following consultation with Takata and the affected vehicle manufacturers, the recall contemplated by this Report and the Consent Order would expand to include the vehicle models listed in section 2 that were sold in or ever registered in any part of Ohio, Indiana, New Jersey, West Virginia, the District of Columbia, Kansas, Pennsylvania Washington, Massachusetts, Connecticut, Michigan, New York, Rhode Island, Oregon, Iowa, and Nebraska; and

- Pursuant to the Consent Order, if ordered by NHTSA based on the results of further testing and engineering analysis of the subject inflators and following consultation with Takata and the affected vehicle manufacturers, the recall contemplated by this Report and the Consent Order would expand to include the vehicle models listed in section 2 that were sold in or ever registered in any of the remaining States.”

Toyota understands the recall schedule will be implemented in a manner consistent with the NHTSA Coordinated Remedy Program Proceeding and the details contained in the Takata Part 573 Reports as noted above. Toyota has previously notified owners of vehicles already identified as involved in this campaign, and will provide additional notification to owners of vehicles newly added to the campaign population. Vehicles will continue to be remedied based on availability of replacement parts and in accordance with the agency’s Coordinated Remedy Program.

9. Distributor/Dealer Notification Schedule:

Notifications to distributors/dealers will be sent on June 15, 2015. Copies of dealer communications will be submitted as they are issued