

INFORMATION Redacted PURSUANT TO THE FREEDOM OF



U.S. Department of Transportation
National Highway Traffic Safety Administration

Vehicle Owner's Questionnaire
To Report Vehicle Safety Defects
1-888-DASH-2-DOT
(1-888-327-4236)
INTERNET: www.nhtsa.dot.gov/hotline

DOT Auto Safety Hotline U.S.C. 552(B)(6) FOR AGENCY USE ONLY 100148

Date Received 12-JAN-2017	Repository <input type="checkbox"/>
	Reference No. 10944534

OWNER INFORMATION (Type or Print)

Name: [Redacted]
Address: [Redacted]
City: MONSON State: MA Zip Code: [Redacted]

Daytime Telephone Number: [Redacted] E-mail Address: [Redacted]
Evening Telephone Number: [Redacted]

The information you provide will be used to identify potential safety-related defects. We may share your information with the applicable vehicle manufacturer during an investigation or recall in accordance with the routine uses described in the agency's Privacy Act notice. See 49 FR 53971 (Sep. 3, 2004).

VEHICLE INFORMATION

17 digit Vehicle Identification Number Located at bottom of windshield on driver's side 5TDBY5G17CS [Redacted]	Make TOYOTA	Model SEQUOIA	Model Year 2012
Date Purchased May 2015	Dealer's Name and Telephone Number Bernardi Toyota (844) 250-2574	Engine: No: Cylinders 8	Fuel Type: Gas
Original Owner <input type="checkbox"/>	Dealer's City Framingham	State MA	Zip Code 01702
Transmission Type Automatic	<input checked="" type="checkbox"/> Antilock Brakes <input checked="" type="checkbox"/> Cruise Control	Powertrain	Multiple Failure:
			Incident Date(s) 04 JUL 2016 12/8/16

FAILED COMPONENT(S)/PART(S) INFORMATION

Vehicle Component Code: 110000 ELECTRICAL SYSTEM
Soybased wires eaten by mice

Failure Mileage: 70000 Failure Speed: **N/A**

ADDITIONAL ITEMS TO BE COMPLETED WHEN REPORTING A TIRE FAILURE

Tire Make: _____ Tire Model (Name or Number): _____ Tire Size (Example P215/65R15): _____
DOT No. (Example: DOTM19ABC036) Original Equipment Prior Repair Failure Location: _____
Tire Component Code: _____ Tire Failure Type: _____

ADDITIONAL ITEMS TO BE COMPLETED WHEN REPORTING A CHILD SEAT FAILURE

Make: _____ Date Manufactured: _____ Model No./Name: _____
Seat Type: _____ Installation System: _____
Child Seat Component Code: _____ Failed Part: _____

APPLICABLE INCIDENT INFORMATION

(Please describe in detail the incident(s), Failure(s), Crash(es), and injury(ies).)

Crash <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Fire <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Number of Persons Injured 0	Number of Deaths 0	Reported to Police N
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Narrative Description of Incident(S), Crash(es), and Injury(ies).

Please describe (1) events leading up to the failure, (2) failure and its consequences, and (3) what was done to correct the failure; i.e. parts repaired or replaced (and if old part is available).

TL* THE CONTACT OWNS A 2012 TOYOTA SEQUOIA. THE CONTACT STATED THAT THE WIRING ON THE VEHICLE WAS CHEWED DUE TO RODENTS. THE SIDE AIR BAGS WERE ALSO CHEWED OUT. THE VEHICLE WAS TAKEN TO A DEALER WHERE IT WAS DIAGNOSED THAT THE WIRING CONTAINED SOY PRODUCTS AND NEEDED TO BE REPLACED. THE VEHICLE WAS NOT REPAIRED. THE MANUFACTURER WAS NOTIFIED OF THE FAILURE. THE FAILURE MILEAGE WAS APPROXIMATELY 70,000. THE VIN WAS NOT AVAILABLE.

Include, if available: Police/Fire Department Report, Photos, and Repair Invoice. ATTACH ADDITIONAL SHEETS IF NECESSARY

The Privacy Act of 1974-Public Law 93-579 This information is requested pursuant to authority vested in the National Highway Traffic Safety Act and subsequent amendments. You are under no obligation to respond to this questionnaire. Your response may be used to assist the NHTSA in determining whether a Manufacturer should take appropriate action to correct a safety defect. If the NHTSA proceeds with administrative enforcement or litigation against a manufacturer, your response, or a statistical summary thereof, may be used in support of the agency's action.

Narrative Description of Incident(s), Failure(s), Crash(es), and Injury(ies)

Please see enclosed information

* Extensive Rodent damage to vehicle caused by soy based wiring that attracts mice. Vehicle was completely inoperable due to fire hazard. Dealer had vehicle from 12/8/16 to 1/27/17 in order to repair. They repaired using same defective wires. Cost was almost \$17,000.00.

ATTACH ADDITIONAL SHEETS IF NECESSARY

U.S. Department of Transportation

National Highway Traffic Safety Administration

1200 New Jersey Avenue SE, Washington, D.C. 20077-9382

Official Business Penalty for Private Use \$300



NO POSTAGE NECESSARY IF MAILED IN THE UNITED STATES

BUSINESS REPLY MAIL

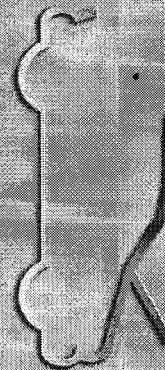
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POSTAGE WILL BE PAID BY ADDRESSEE

**US Department of Transportation
National Highway Traffic Safety Administration
Office of Defects Investigation, NEF-100
1200 New Jersey Avenue SE.
Washington, D.C. 20077-9382**



Think your vehicle has a safety defect?



If so:

Use the enclosed form to file a report.

or visit:

www.safercar.gov

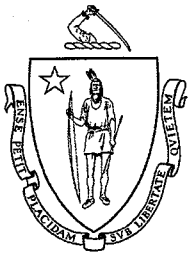
or call:

Vehicle Safety Hotline
888-327-4236



Vehicle Owner's Questionnaire (VOQ)
U.S. Department of Transportation
National Highway Traffic Safety Administration





THE COMMONWEALTH OF MASSACHUSETTS
OFFICE OF THE ATTORNEY GENERAL
ONE ASHBURTON PLACE
BOSTON, MASSACHUSETTS 02108

MAURA HEALEY
ATTORNEY GENERAL

(617) 727-2200
(617) 727-4765 TTY
www.mass.gov/ago

January 6, 2017

[REDACTED]
Monson, MA [REDACTED]

RE: Toyota Motor Sales USA., Inc.
AGO File # [REDACTED]

Dear [REDACTED]

Thank you for contacting the Attorney General's Office (AGO). The Office is not able to handle every matter that is brought to its attention; however, we do review all complaints that are received. The National Highway Traffic Safety Administration is the agency with oversight of this matter. You may want to contact them for further assistance. The agency is located at:

1200 New Jersey Avenue, SE, West Building
Washington, DC 20590
(888) 327-4236

Because the AGO does not provide legal representation or legal advice to individuals, you may want to consider consulting with a private attorney or filing a claim in Small Claims Court. If you need assistance with locating a private attorney, then you may contact the Massachusetts Bar Association's Lawyer Referral Service at (617) 654-0400 or at 20 West Street, Boston, MA 02111. Your local county bar association may also be a helpful resource in finding an attorney.

The Small Claims Court Advisory Service is a resource available to consumers seeking information about the civil small claims process. They may be reached at (617) 497-5690 or online at www.masmallclaims.org. Other informational resources from the Massachusetts Trial Court Department can be found online by searching the www.mass.gov website for "Small Claims Information."

Sincerely,

Consumer Advocacy and Response Division



CONSUMER COMPLAINT FORM
Office of the Attorney General
Consumer Advocacy & Response Division
One Ashburton Place
Boston, MA 02108

Your Contact Information:

First Name: [REDACTED] Last Name: [REDACTED]

Address: [REDACTED]

City: **Monson**

State: **MA**

Zip: [REDACTED]

Daytime Phone: [REDACTED]

Extension:

(NOTE: The AGO will only contact you by telephone Monday through Friday, 9:00 a.m. to 5:00 p.m.)

Email: [REDACTED]

Veteran of U.S. Military Service OR **YES**
Active Duty U.S. Military:

Check here if you are over 60: **NO**

(Optional: You are not required to provide this information to file a complaint, but having it may help us serve you more effectively.)

Are you filing for yourself as an **Individual**
individual or as a business:

Provide information below on the business or organization that you are complaining about:

Business Name: **Toyota Motor Corporation, USA, Inc.**

Address: **P.O. Box 259001**

City: **Piano**

State: **TX**

Zip: **25900**

Phone: **800-331-4331**

Extension:

Type of Business: **Auto Sales/Leasing/Rental**

Was this an online transaction: **NO**

Information about your complaint:

Describe the problem or concern that this complaint is about:

The electrical wiring in my 2012 Toyota Sequoia has been completely chewed to pieces by rodents. The truck was taken in for an oil change on December 8, 2016 and I was told the truck is not driveable due to the risk of an electrical fire. There are two class actions pending against Toyota on the basis of this same problem. The corporation is using a soy based coating to protect the electrical wires but this coating is known to them to attract rodents. There are currently 13 cars at Balise Toyota in line before my car to be

repaired from rodent damage. I believe this is a violation of the consumer protection act for the company to continue to use this product knowingly full well that consumers are experiencing serious rodent damage. This action by Toyota is also costing insurance companies thousands of dollars in repair costs. My vehicle will cost \$ 14,000.00 to fix and I wont have it for two months, I am forced to incur rental car fees and payment of my deductible.

Did you make a payment: YES

If yes, please indicate method of payment: Check

What do you seek as a result of filing this complaint:

Assistance from the AGO and possible mediation of my complaint

If you are requesting consumer assistance, what resolution do you seek: I want Toyota to stop using this soy based product on its wiring; I want them to buy back my truck less reasonable depreciation ; I want to be reimbursed my expenses and aggravation.

If you are seeking a specific dollar amount for a resolution, please indicate the amount: \$ 40,000.00

Have you complained directly to the business? YES

Have you previously contacted the AGO or other agencies about this problem? NO

Have you hired an attorney to represent you in this matter? NO

Has this matter ever been taken to court? NO

Instructions:

DO NOT SEND ORIGINALS. Your documents will NOT be returned to you. Please do not send any documents other than this complaint form until someone from our office contacts you.

Please do NOT include financial account numbers, credit or debit card numbers, your social security number, etc., or other sensitive personal identifying information. We will contact you if we need any of this information.

Read the Following Before Signing Below:

I. Disclosure of Your Complaint.

Public Record.

Under most circumstances, your complaint and any related information will be considered a public record and available to any member of the public upon request. In addition, data concerning your complaint, not including personally identifying information, may be publically posted on the AGO website.

Disclosure to the Business or Organization.

In order to resolve your complaint we may release any and all information with regard to this complaint, including the form itself, to the business or organization you are complaining about.

Disclosure to Other Entities.


Your complaint and any related information may be disclosed to other law enforcement and regulatory agencies, including one of the Local Consumer Programs or legal services attorney in your area.

II. Disclosure of Information by the Business to the AGO.

By signing below you authorize the Business or Organization you are complaining about to release any information to the Attorney General's Office necessary for the resolution of your complaint.

III. Consulting With a Private Attorney.

The AGO cannot give you legal advice and is not able to be your private attorney, but represents the public interest. If you have any questions concerning your individual legal rights or responsibilities you should contact a private attorney.

Signed By: 

By filling in my name above and checking this box, I acknowledge that I have read and understood the provisions above and certify that the information I have provided is true and correct to the best of my knowledge, and I adopt this as my online signature.

Declaration: YES

Submitted on: 12/31/2016 03:57:04 PM EST

January 10, 2017

Ms. Kayla Costa
Commerce Insurance Company
11 Gore Road
Webster, MA 01570

RE: Insured: [REDACTED]
Claim # : AONRM4N-[REDACTED]
Policy# [REDACTED]

Dear Ms. Costa:

Enclosed herein please find a letter relative to the above captioned claim that was sent to Balise Toyota. You are being copied on this letter as **official notice** to Commerce Insurance Company that once this problem with rodent damage re-occurs I expect that Commerce will be responsible in full for all expenses including rental car fees and all other out of pocket expenses I must incur. If Commerce is assenting to Balise repairing the vehicle using the same wiring that caused this problem in the first instance, then they are assenting to being responsible for the future damage they know will result therefrom.

You should also note that there is rodent resistant repair tape that is available for use on vehicles with rodent damage. It can be purchased on Amazon. I believe that I am, at the very least, entitled to this protection on my vehicle at your expense.

Lastly, I plan on filing a class action lawsuit against Toyota for this damage as they use soy-based wiring that they know attracts rodents. Information about two other class action lawsuits on this same issue in California and Indiana can be obtained online. Your company may want to investigate this further before it pays out thousands of dollars more in claims.

Thank you for your attention to this matter.

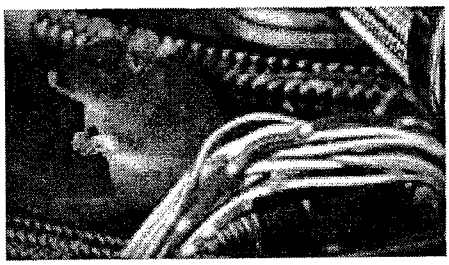
Sincerely,

[REDACTED]

Monson, MA [REDACTED]

Toyota Soy Wiring Class Action Lawsuit





This lawsuit claims that Toyota incorporated soy-based materials or components in certain vehicles' electrical wiring systems that bait rodents and other animals, including rats, squirrels, and other pests, to the vehicles and entice them to chew through, eat, or otherwise damage and compromise the wiring and the wiring insulation.

One plaintiff in this lawsuit, [REDACTED], is a resident of Burleson, Texas. In November 2015, [REDACTED] and her husband purchased a 2015 Toyota Avalon from Family Toyota in Burleson. One November 21, 2016, she tried to start her Avalon multiple times but the engine would not turn over and the car made no noise or sounds. The car was parked in their garage, as always. [REDACTED] and her husband lifted the hood of the car and noticed a rodent scurry across the top of the engine. The vehicle was towed to Family Toyota, and a technician there informed them the damage would cost between \$5,600 and \$6,000 to repair. The repairs were covered by her insurance company, but [REDACTED] still had to pay a \$500 deductible. When [REDACTED] asked Toyota why they did not cover the damage under her warranty, they responded saying that "any outside source of damage to the car" is not covered. Further, the representative stated that rodent damage is "not uncommon" and that the rodent damage "happens a lot" with Toyota vehicles.

Electrical systems in a vehicle deliver and monitor electrical power to various devices and sensors in the vehicle. When an electrical component is not working correctly, it is often caused by an open circuit, which can result from a broken or compromised wire or wire connections. When this occurs, vehicle functions that are imperative to safe vehicle operation (headlights, brake lights, windshield wipers, power windows, defrosters, etc.) may not work properly. Historically, automobile wiring was coated or covered with a glass, plastic, or polymer-based insulation. Over the past decade, in light of rising oil prices, automotive manufactures have been exploring new materials and to make parts more recyclable. As a result, automobile manufacturers, including Toyota, migrated from petroleum-based wire insulation to soy-based insulation because it became considerably less expensive and is purportedly more environmentally-friendly.

Toyota made the decision to switch its wiring insulation to soy-based material in order to cut costs and increase profits, not to help the environment. Rather than helping the global environment, Toyota created an environment inside of their vehicles that invited rodents to destroy



electrical components. Based on records of customers' complaints, dealership repair records, NHTSA records, warranty and post-warranty claims, internal durability testing, and other sources, Toyota was aware of the problem and chose not to inform vehicle owners.

Based on the facts of the case, the plaintiffs in this class action lawsuit allege that Toyota violated the Magnuson-Moss Warranty Act, violated the Texas Deceptive Trade Practice Act, breach the express warranty, breached the implied warranty of merchantability, and was unjustly enriched at the expense of consumers.

Article Type: Lawsuit

Most Recent Case Event

Wednesday, December 7, 2016

Toyota Soy Wiring Complaint

This complaint claims that Toyota cut its costs by incorporating soy wiring into its electrical system, thus attracting rodents into the engine.


 [toyota_soy_based_components_complaint.pdf](#)

Event History

Wednesday, December 7, 2016

Toyota Soy Wiring Complaint

This complaint claims that Toyota cut its costs by incorporating soy wiring into its electrical system, thus attracting rodents into the engine.

 [toyota_soy_based_components_complaint.pdf](#)

Tags: Defective Automobile, Defective Wiring

Free Case Evaluation

January 10, 2017

Mr. Karl Subklew
Assistant Service Manager
Balise Toyota
1399 Riverdale Street
West Springfield, MA 01089

RE: Customer: [REDACTED]
Vehicle: 2012 Toyota Sequoia
Insurer: Commerce Insurance Company
Insurer ID# : [REDACTED]
Defect: Rodent Damage to Wiring

Dear Mr. Subklew:

It is my understanding that Balise Toyota will begin ordering parts for the necessary repairs on the above captioned vehicle since an agreement has been reached with Commerce Insurance Company. I have been informed by you that your dealership will be using the same soy-based electrical wiring for the repairs.

Let this letter serve as notice that I object to this wiring being used in light of the fact that it is this soy-based wiring that is *attracting rodents* to the vehicle. Toyota has been on notice of this fact for some time as class action lawsuits on this same issue are currently pending in both California and Indiana. To replace faulty wiring known to attract rodents with the same wires will only serve to cause the problem to occur again.

In order to avoid future rodent damage to my vehicle, I request that anti-rodent insulated repair tape or wiring be used to repair my vehicle and the cost for such be borne by Toyota Corporation. Other car manufacturers, including Lexus which is owned by Toyota, are not having this same rodent damage problem so perhaps you can investigate what wiring products they are using.

If in fact, the vehicle is repaired and rodent damage happens again, I expect that both your dealership and the Commerce Insurance Company will be responsible to pay the entire amount including any rental car fees. Should you have any questions please feel free to contact me at

[REDACTED]

Sincerely,

[REDACTED]

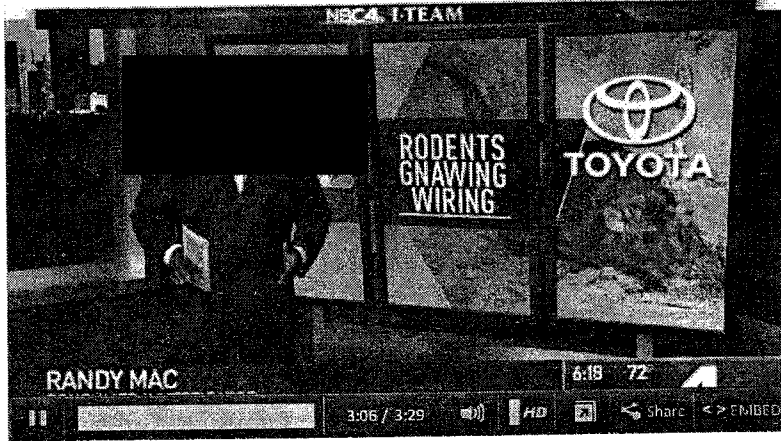
Monson, MA [REDACTED]

cc: Commerce Insurance Company

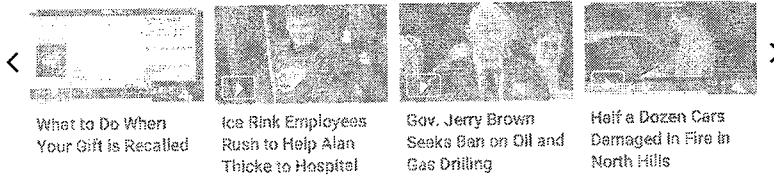
Class Action Lawsuit Alleges Rodents Chewing, Eating Car Wiring

A man suing Toyota claims soy-based coating used to protect wires from the elements is attracting rodents

By Randy Mac and Matt Schrader



A new lawsuit contends that ecofriendly materials used in car wiring attracts rodents. Randy Mac Investigates for the NBC4 News at 6 on Wednesday, Sept. 14, 2016. (Published Wednesday, Sept. 14, 2016)



Months after a lawsuit was filed against Honda for using an eco-friendly material experts say attracts rodents, a new lawsuit filed in Los Angeles suggests there could be tens of millions of defective Toyota vehicles and drivers left to pay for thousands of dollars in repairs.

_____ says rodents — in this case squirrels — are gnawing away at the wiring inside his Toyota pickup truck. Tired of paying for repairs, _____ getting creative.

• Critters Could Be Causing You Car Problems

"I've tried a lot of different things, from trapping them to putting cayenne pepper," _____ said. "I've placed mothballs in the vehicle. Finally, right now, we're using cats."

But nothing has worked.



TRENDING STORIES

- 1 Cops Allow Police Dog to Bite Naked, Unarmed Man
- 2 Graphic Video: Police Allow Dog to Bite Naked, Unarmed Man
- 3 Walmart Pulls 'Offensive' Mugs From Website
- 4 NFL Approves Rams, Chargers Stadium Lease Agreement
- 5 Nuisance Neighbor: Feces, Vomit, Urine Left on Woman's Car

WEATHER FORECAST

WEATHER ALERTS view all

Los Angeles, CA

68° Haze
Feels Like 68°

Radar

Forecast

Maps

WHAT DO YOU THINK?

Pick One: Sweet potato pie or pumpkin pie?

Sweet potato



The soy-based coating used to protect wires from the elements is actually attracting the rodents, he says. The issue is causing displays on his truck to malfunction, including the fuel gauge, anti-lock brakes, four-wheel drive and check engine light. They're recurring problems he says Toyota will not cover under his warranty.

So far, he's out \$2,200.

- **Renters Worry About Apartment Flooding**

"I feel like it's a warranty issue because the materials are poor quality," [REDACTED] said.

His attorney, Brian Kabateck, has filed a class action lawsuit against Toyota, claiming many 2012 to 2016 used soy-based wiring known to be a problem. While rodents have a documented history of damaging vehicle wiring, he says the soy makes the wiring a food source.

- **Vacation Booking Warning**

"It may have started out as a good idea, an eco-friendly idea. It's just ill-conceived," Kabateck said.

The I-Team first uncovered the problem of rodents chewing through wires in March. At that time only Honda was facing a class action lawsuit. But Kabateck says that Honda lawsuit should have been a wake-up call to Toyota.

"You don't make a product that is edible," he said. "A consumer purchases a car, they don't know this is a problem."

Mechanic Mark Buche says it's not just Toyotas using soy wire coating, though many of his repairs are.

"We've seen ground squirrels, raccoons, we've seen rats," Buche said. "We've been pretty busy."

A repair can run up to \$1,500 each time.

The I-Team reached out to Toyota about the soy wiring. The company responded, "We decline to comment."

Toyota has not yet responded to [REDACTED] lawsuit, either.

Uneasy about driving his own truck, [REDACTED] feels it's on Toyota to fix this problem for its customers.

"I don't think I could sell this vehicle this way," [REDACTED] said.

- Pumpkin
- I can't taste the difference
- No opinion

NEXT

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\$10 MILLION RECOVERED

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attorney does not know how many vehicles Toyota has produced with the soy wiring, but the company sells about 10 million new vehicles every year. The attorney says it's possible this lawsuit could expand to include other years and even other manufacturers using the soy wiring.

Honda said in a statement: "Since there is pending litigation involved, we will not be able to offer detailed comments about that suit at this time. However, before airing a story based on plaintiff's allegations, please research, in general, the long-known history of rodents chewing wires of all types. Rodents' teeth grow throughout their lives, and they are compelled to chew on things, wherever they nest, to keep the teeth filed down. They are known to chew home wiring, car wiring or wires wherever they nest, and, particularly in the winter, they try to find warm locations, like a home or a vehicle's warm engine compartment.

"It is true that Honda has offered a potential solution to this age-old problem by selling a rodent-deterrent tape infused with capsaicin, the core element of spicy peppers, to use in cases where a customer has experienced rodent damage. This is a good solution for our customers who live in areas where rodents like to nest in vehicles."

Published at 5:45 PM PDT on Sep 14, 2016 | Updated at 1:42 PM PDT on Sep 15, 2016

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Rodent Intrusion Process

Preliminary Inspection: This inspection will determine if vehicle requires a full Tear Down Inspection or if it requires other repairs to return vehicle to serviceability. Requires approximately 1 to 2 hours to complete.

- Technician inspects vehicle visually for signs of animal/rodent intrusion, including but not limited to feces, urine, nesting, materials, and damaged areas of engine compartment or vehicle's passenger cabin.
- Technician inspects air cleaner box, duct-work, air filter, hood pad, wiper cowling, engine cover and wiring harnesses.
- Technician inspects interior of vehicle passenger cabin, cabin filter, heating, ventilation, and air conditioning (HVAC) components, blower box assembly, heater box assembly, A-pillar trim panels, and under seats.
- Technician inspects trunk/cargo area, lifts up trim panels and trunk/cargo cover.
- Tear down will be scheduled at time of preliminary inspection based on technician availability and current workload.*

Tear Down Inspection: Requires between 4 to 8 hours to complete (dependent on vehicle year, make, model and design). Customer must bring vehicle empty of ALL personal items prior to tear down starting. Assistant Service Manager (ASM) will verify with customer at time of drop off, that vehicle meets criteria. The customer is required to take personal belongings with them if any items are accidentally left in vehicle. Tear down process will not begin until vehicle is empty, this includes the glove box, center console, trunk/cargo area, cup holders and side door storage areas.

- Technician removes engine cover, air cleaner box assembly, wiper blades, wiper cowling and other components as required to fully determine extent of animal/rodent intrusion damage.
- Technician examines wiring harnesses, connectors, junction boxes and other components in engine compartment area as required to determine extent of animal/rodent intrusion damage.
- Technician removes seats, interior trim panels, head liner, dash board, center console, heater box assembly, evaporator box assembly, main crossbar support, carpets, HVAC duct-work, floor pads, dome lights, and sun visors in passenger cabin area, as required to determine extent of animal/rodent intrusion damage.
- Technician removes trunk/cargo area trim panels, liners, spare tire, tools, foam pads/tool holders, as required to determine extent of animal/rodent intrusion damage.
- Technician returns all components, trim panels, seats, carpet etc., which were removed for prior inspection into vehicle to facilitate storage of and prevent loss of vehicle parts. Vehicle is parked and locked, keys kept secured by Technician.
- Technician removes animals/rodents living and/or dead and disposes of such. In most cases Technician will need to trap/capture animal/rodent. If possible they are humanely dispatched or relocated. In other cases Technician will remove corpses of animals/rodents and dispose of by guidelines set forth by the Center for Disease Control and Prevention (CDC). Guidelines as listed below:

- Spray the dead rodent or nest and the surrounding area with a disinfectant or a mixture of bleach and water.
- Soak rodent, nesting materials and/or droppings in solution for 5 minutes before wiping up with a paper towel or cloth.
- Place the dead rodent and/or nesting materials in a plastic bag and seal tightly, then place the bag in a second plastic bag and seal.
- Dispose of bag in a covered trash can that is regularly emptied.

Animal/Rodent Damage Estimate: Requires approximately 1 hour to complete.

- Technician completes a thorough estimate of damages and repairs required to return vehicle to serviceability,
- Technician works closely with both Parts Personnel and ASM's to assure accuracy in correct pricing, parts and labor charges for completion of repairs required, as well as estimated arrival time for parts.

Adjuster Inspection and Evaluation: Requires approximately 1 hour to complete.

- Technician explains completed estimate to adjuster.
- Technician removes components from vehicle for Adjuster to inspect, photograph, and evaluate condition of parts and vehicle.
- Adjuster completes their portion of the estimate and informs ASM of Authorization of repairs and parts ordering.

Parts Ordering and Arrival: Requires approximately 1 hour to order the needed parts. Parts arrival is reliant upon availability, distance and shipping time and cannot be confirmed until parts arrive and are checked for shipping damage.

- Technician works with Parts Personnel to verify correct parts are ordered based on Adjusters Authorization.
- Technician checks in daily with Parts Personnel to verify parts have arrived onsite undamaged.
- Once parts are all onsite, Technician sets up time for Decontamination Process to start.

Decontamination Process: Requires between 8 to 16 hours to complete once started, dependent on condition of vehicle and amount of contamination needed to be removed.

- Typically vehicles sit 1 to 2 weeks prior to starting decontamination process, as per CDC guidelines:
 - When there is no evidence of infestation, wait a minimum of 5 days before beginning to clean these areas.
 - Before cleaning, ventilate the vehicle by opening the doors, windows, hood and trunk/cargo area for at least 30 minutes to allow fresh air to enter the areas and remove potentially contaminated air.
 - Use cross-ventilation and leave the area during the airing-out period.
- Technician removes all parts, and components as required to empty vehicle interior to bare floor, sidewalls, roofing, and firewall to allow Decontaminating of Animal/Rodent feces, urine and nesting materials.
- Technician performs Decontamination Process utilizing bleach, disinfectants, neutralizer, soap, water, and deodorizer.
- Due to nature of contaminants, all feces, droppings, nesting materials, etc. need to be thoroughly wetted by spraying disinfectant on them prior to removing.
- The removal of heavy contaminated materials is done using cloths and a specially set up vacuum (vacuum is only while contaminants are thoroughly wet with disinfectant, and never used when contaminants are dry and could become airborne).
- Technician uses a Forced Air Fed Breathing Mask system for safety, dust masks, nitrile gloves, towels and ventilation.
- All surfaces are decontaminated following strict methods of wetting areas down with bleach, letting areas set for 5 to 30 minutes depending upon contaminate saturation, material type/durability, location, and technician experience with areas being decontaminated.
- Once complete, technician will neutralize surfaces with soap and water.
- Once neutralized, technician will wipe surfaces down using disinfectant, and will continue wiping down until completely dried.
- Technician continues until all exposed surfaces are decontaminated.
- Technician installs a wire mesh screen in the inlet duct of vehicle to decrease the likelihood of recurrence of animals/rodents intrusion.
- Technician replaces damaged parts, re-installs all previously removed parts and components: including but not limited to head liner, visors, carpet, seats, trim panels, heater box assembly, evaporator box assembly, dash board etc., restoring vehicle to serviceability.
- Technician decontaminates engine compartment areas including air cleaner, duct work, and washes exposed area of engine compartment to remove heavy feces and urine contamination.
- Technician completes a thorough system check of vehicle and performs a road test to verify vehicle is operating as designed.

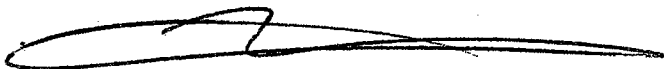
Please note: Some personal items require different methods of decontamination/disinfecting. Examples are as follows, as set forth by CDC and are the responsibility of the customer.

Clothing, Bedding, Stuffed Animals

- Customer is responsible for laundering potentially contaminated bedding, clothing, or stuffed animals with hot water and detergent.
- Customer needs to wear rubber, latex, vinyl, or nitrile gloves when handling contaminated items.
- Customer is responsible for machine-drying laundry on a high setting or hang it to air dry in the sun.
- **Note:** Laundry detergent breaks down the virus's lipid envelope, rendering it harmless. Additionally, heat generated by a clothes dryer that reaches a temperature of 45 degrees Celsius or approximately 115 degrees Fahrenheit will also ensure that the virus is noninfectious.

Books, Papers and other Non-washable items

- Customer may choose to leave books, papers, and other items that cannot be cleaned with a liquid disinfectant or be thrown away, outdoors in the sunlight for several hours, or in an indoor area free of rodents for approximately 1 week. After that time, the virus should no longer be infectious.
- Customer needs to wear rubber, latex, vinyl, or nitrile gloves and wipe the items with a cloth moistened with disinfectant.
- **Note:** Once excreted into the environment by an animal/rodent, Hantaviruses can survive in the environment and remain infectious for a period of 2-3 days. Ultraviolet rays in sunlight help to inactivate Hantaviruses.



(Assistant Service Manager's signature)

1-26-17

(Date)



(Customer's signature)

1-26-17

(Date)

January 13, 2017

Federal Trade Commission
600 Pennsylvania Avenue NW
Washington, DC 20580
Attention: Consumer Complaint Division

RE: Safety Complaint against Toyota Motor Corporation
Reference #: [REDACTED]

Dear Madam/Sir:

Please let this letter serve as a follow-up to my recent call wherein I filed a safety complaint against Toyota Motor Corporation.

The basis of my complaint is that the company is using soy-based insulation on the electrical wiring in the vehicles which actually **attracts** rodents. The rodents eat the wiring causing exposed electrical wires, electrical failure and ultimately electrical car fires.

By way of background, I brought my 2012 Toyota Sequoia to the dealership on December 8, 2016 for a routine oil change. The vehicle had 72,000 miles on it. The technician would not let me drive the vehicle home due to the extensive damage caused by mice eating the wires. I was told the vehicle could catch fire at any time. The insurance company was notified and agreed to pay \$ 14,000.00 to fix the electrical system. **However, Toyota will be using the same wiring to do the repairs.** I contacted Toyota Customer Service and was told "the issue is caused by outside influence so its not covered." This response was a "boilerplate phrase" that allows the company to deny responsibility for any defects and it is just not acceptable.

Additionally, this is not an isolated incident. My neighbor two doors down had his 2010 Toyota Tundra eaten by mice as well causing the vehicle to mis-fire while accelerating on the Massachusetts Turnpike at high rates of speed. His vehicle cost in excess of \$10,000.00 to repair. The dealership where I took my vehicle had 13 cars in front of mine to be repaired all due to rodent damage. There are two class action lawsuits pending in California and Indiana against Toyota for this same problem.

I respectfully request that Toyota be investigated immediately for their continued use of this wiring product. It poses a grave safety issue to citizens who drive these vehicles and it is costing insurance companies thousands of dollars in repairs. There are other products Toyota could use that would not attract rodents.

Thank you for your anticipated attention to this important matter. Should you have any questions or need further information please feel free to contact me at [REDACTED]

Sincerely,

[REDACTED]

[REDACTED]

Monson, MA [REDACTED]

cc: James Lentz, CEO
Toyota Motor North America
9 West 57th Street, Suite 4900
New York, NY 10019

CUSTOMER #:



BALISE TOYOTA

INVOICE

1399 Riverdale Street
DUPLICATE 1 West Springfield, MA 01089
PAGE 1 (413) 731-8500

monson, MA

HOME

BUS:

CONT

CELL:

SERVICE ADVISOR: 8429 KARL SUBKLEW

Table with columns: COLOR, YEAR, MAKE/MODEL, VIN, LICENSE, MILEAGE IN/OUT, TAG. Includes details for a 2012 Toyota Sequoia with VIN 5TDBY5G17CS.

Table with columns: LINE, OPCODE, TECH, TYPE, HOURS, LIST, NET, TOTAL.

A FACTORY LOF - PERFORM OIL CHANGE (UP TO 5 QTS CONVENTIONAL FLUID), REPLACE FACTORY OIL FILTER, TOP FLUIDS, RESET MAINTENANCE LIGHT. Includes parts list for 10449 CP, 1 04152-YZZA4, 1 12031 GASKET, and 8 00279-0WQTE-01.

B PERFORM MULTI-POINT INSPECTION INCLUDED TOYOTA DRIVER'S MAT INSPECTION. 99PMAT PERFORM MULTI-POINT INSPECTION INCLUDED TOYOTA DRIVER'S MAT INSPECTION. Includes items 11704 I67D, 1 74610-34040-B0 GRIP ASSY, ASSIST, and DFMOKC.

C NO ROTATION OR AIR INFO NO ROTATION OR AIR. Includes item 11704 I67D.

D** TEAR DOWN FOR MICE CONCERN INFO SEE TECHNICIAN NOTES. Includes items 10449 CEXC, 1 12611-0S010 COVER, ENGINE, NO.1, 1 12601-0S010 COVER SUB-ASSY, ENGI, 1 12612-0S010 COVER, ENGINE, NO.2, 1 12613-0S010 COVER, ENGINE, NO.3, and 1 71611-0C090 PAD, RR SEAT CUSHION.



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Summary table with columns: DESCRIPTION, TOTALS. Rows include LABOR AMOUNT, PARTS AMOUNT, GAS, OIL, LUBE, SUBLET AMOUNT, MISC./ENVIR. CHARGES, TOTAL CHARGES, LESS INS./COUPONS, SALES TAX, and PLEASE PAY THIS AMOUNT.

CUSTOMER #: [REDACTED]

INVOICE

BALISE TOYOTA

1399 Riverdale Street
West Springfield, MA 01089
(413) 731-8500

monson, MA [REDACTED]
HOME: [REDACTED] CONT: [REDACTED]
BUS: [REDACTED] CELL: [REDACTED]

SERVICE ADVISOR: 8429 KARL SUBKLEW

COLOR	YEAR	MAKE/MODEL	VIN	LICENSE	MILEAGE IN/ OUT	TAG	
GRAY	12	TOYOTA SEQUOIA	5TDBY5G17CS [REDACTED]		77855/77855	T5768	
DEL DATE	PROD. DATE	WARR. EXP.	PROMISED	PO NO.	RATE	PAYMENT	INV. DATE
01JAN12 DD			WAIT 27JAN17		VAR	CASH	26JAN17

R.O. OPENED	READY	OPTIONS:	DLR: [REDACTED]
09:07 08DEC16	05:57 26JAN17		

LINE	OPCODE	TECH	TYPE	HOURS	LIST	NET	TOTAL
1	62560-0C040-C0		GARNISH ASSY, RR WIN		140.01	140.01	140.01
1	62550-0C040-C0		GARNISH ASSY, RR WIN		140.01	140.01	140.01
1	87201-0C030		DUCT SUB-ASSY, AIR		80.36	80.36	80.36

E Air Filter Element - Replace**
 CAUSE: Rodent/Animal intrusion damages,urine feces stains,
 INFO SEE TECHNICIAN NOTES
 10449 CP 0.00 0.00
 1 17801-QS010 ELEMENT SUB-ASSY, AI 27.00 18.95 18.95

F Cabin Air Filter (Standard Pollen/Electrostatic) - Replace**
 CAUSE: Rodent/Animal intrusion damages,urine feces stains,
 INFO SEE TECHNICIAN NOTES
 10449 CP 0.00 0.00
 1 87139-YZZ20 ELEMENT, AIR REFINER 20.00 20.00 20.00

G Evacuation and Recharge - Complete (With R-134a)**
 AG12 Evacuation and Recharge - Complete (With R-134a)
 10449 CEXC 150.00 150.00
 2 00263-00134-01 R134A REFRIGERANT 16.04 16.04 32.08
 2 CL115 PAG 46 4.00 4.00 8.00

H Evaporator and Heater Box Assembly,Replacement.**
 CAUSE: replace evaporator and heater box assembly,due to Rodent/Animal intrusion,urine,feces stains,
 INFO SEE TECHNICIAN NOTES
 10449 CEXC 1400.40 1400.40
 1 87050-0C030 RADIATOR ASSY, AIR C 1321.43 1321.43 1321.43
 1 87130-0C061 BLOWER ASSY 569.00 569.00 569.00

I Side Curtain Air Bag - Replace (Labor Only)**
 CAUSE: replace both side curtain air bag assemblies,due to Rodent/Animal intrusion damage,urine feces stains,



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DESCRIPTION	TOTALS
LABOR AMOUNT	
PARTS AMOUNT	
GAS, OIL, LUBE	
SUBLET AMOUNT	
MISC./ENVIR. CHARGES	
TOTAL CHARGES	
LESS INS./COUPONS	
SALES TAX	
PLEASE PAY THIS AMOUNT	

CUSTOMER #: [REDACTED]

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BALISE TOYOTA

monson, MA [REDACTED]
 HOME: [REDACTED] CONT: [REDACTED]
 BUS: [REDACTED] CELL: [REDACTED]

SERVICE ADVISOR: 8429 KARL SUBKLEW

COLOR	YEAR	MAKE/MODEL	VIN	LICENSE	MILEAGE IN/ OUT	TAG	
GRAY	12	TOYOTA SEQUOIA	5TDBY5G17CS [REDACTED]		77855/77855	T5768	
DEL DATE	PROD. DATE	WARR. EXP.	PROMISED	PO NO.	RATE	PAYMENT	INV. DATE
01JAN12 DD			WAIT 27JAN17		VAR	CASH	26JAN17
R.O. OPENED	READY	OPTIONS:	DLR:				
09:07 08DEC16	05:57 26JAN17		[REDACTED]				

LINE	OPCODE	TECH	TYPE	HOURS	LIST	NET	TOTAL
INFO SEE TECHNICIAN NOTES							
				10449 CP		0.00	0.00
1	62180-0C071			AIR BAG ASSY, CURTAIN	1521.43	1521.43	1521.43
1	62170-0C071			AIR BAG ASSY, CURTAIN	1521.43	1521.43	1521.43

J** headliner Rodent/Animal Intrusion damages,urine,feces, CAUSE: repalce headliner ,decontaminate and swap components as required,replace pads,clips and retainers,							
INFO SEE TECHNICIAN NOTES							
				10449 CEXC		540.00	540.00
1	63310-0C979-BO			HEADLINING ASSY,ROOF	2346.42	2346.42	2346.42

K** remove intake ,clean of Rodent/Animal intrusion debris,nesting materials,,inspect and replace if necessary knock sensor harness, CAUSE: Rodent/Animal intrusion,nesting materials,feces,urine,debris ,fire hazard,,inspect knock wiring,							
INFO SEE TECHNICIAN NOTES							
				10449 CEXC		300.00	300.00
1	82219-0C020			WIRE, SENSOR	34.91	34.91	34.91
2	17171-0S030			GASKET, MANIFOLD	16.06	16.06	32.12

L** intake plenum foam isolators,Rodent/Animal damages, CAUSE: repalce foam isolators,							
INFO SEE TECHNICIAN NOTES							
				10449 CEXC		300.00	300.00
1	12612-0S010			COVER, ENGINE, NO.2	24.71	24.71	24.71

M** main engine wiring harness,junction block wiring,Rodent/Animal intrusion,damages,urine,feces,exposed wires, CAUSE: replace junction block and wiring harness assembly,							
INFO SEE TECHNICIAN NOTES							
				10449 CEXC		1200.50	1200.50
9	90080-46327			CLIP	1.32	1.32	11.88



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DESCRIPTION	TOTALS
LABOR AMOUNT	
PARTS AMOUNT	
GAS, OIL, LUBE	
SUBLET AMOUNT	
MISC./ENVR. CHARGES	
TOTAL CHARGES	
LESS INS./COUPONS	
SALES TAX	
PLEASE PAY THIS AMOUNT	

CUSTOMER #: [REDACTED]

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BALISE TOYOTA

monson, MA [REDACTED]
 HOME: [REDACTED] CONT: [REDACTED]
 BUS: [REDACTED] CELL: [REDACTED]

SERVICE ADVISOR: 8429 KARL SUBKLEW

COLOR	YEAR	MAKE/MODEL	VIN	LICENSE	MILEAGE IN/OUT	TAG	
GRAY	12	TOYOTA SEQUOIA	5TDBY5G17CS [REDACTED]		77855/77855	T5768	
DEL DATE	PROD. DATE	WARR. EXP.	PROMISED	PO NO.	RATE	PAYMENT	INV. DATE
01JAN12 DD			WAIT 27JAN17		VAR	CASH	26JAN17
R.O. OPENED	READY	OPTIONS:	DLR				
09:07 08DEC16	05:57 26JAN17		[REDACTED]				

LINE	OPCODE	TECH	TYPE	HOURS	LIST	NET	TOTAL
1	82111-0C413	WIRE, ENGINE ROOM MA			3358.72	3358.72	3358.72

N** both rear most power seats, seat cushions, Rodent/Animal intrusion, damage, urine, feces, nesting materials,
 CAUSE: replace both rear power seat cushions, Backs,
 INFO SEE TECHNICIAN NOTES

10449	CEXC				200.00	200.00	
1	71652-0C130	PAD, RR SEAT BACK, L			159.29	159.29	159.29
1	71612-0C090	PAD, RR SEAT CUSHION			116.08	116.08	116.08
1	71651-0C170	PAD, RR SEAT BACK, R			116.08	116.08	116.08

O** "C" pillar interior trim panels, Rodent/Animal intrusion damages,
 CAUSE: replace both sides "C" pillar trim panels,
 INFO SEE TECHNICIAN NOTES

10449	CP				0.00	0.00	0.00
2	90467-10183	CLIP			2.92	2.92	5.84

P** inlet duct, Rodent/Animal intrusion urine feces stains,
 CAUSE: replace inlet duct,
 INFO SEE TECHNICIAN NOTES

10449	CP				20.00	20.00	20.00
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Q** decontaminate due to Rodent/Animal intrusion,
 CAUSE: decontaminate engine compartment, duct work, cowling, interior trim panels, flooring, roofing, side walls, duct work, etc as required for Rodent/Animal intrusion contamination.
 INFO SEE TECHNICIAN NOTES

10449	CP				882.88	882.88	882.88
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R** ADDED SCREENING TO AIR INLETS / DECLINED MOUSE BLOCKER DEVICES AT HIS EXPENCE
 INFO SEE TECHNICIAN NOTES

10449	CP				0.00	0.00	0.00
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DESCRIPTION	TOTALS
LABOR AMOUNT	
PARTS AMOUNT	
GAS, OIL, LUBE	
SUBLET AMOUNT	
MISC./ENVIR. CHARGES	
TOTAL CHARGES	
LESS INS./COUPONS	
SALES TAX	
PLEASE PAY THIS AMOUNT	



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CUSTOMER #: [REDACTED]

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BALISE TOYOTA

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DUPLICATE 1
PAGE 5

monson, MA [REDACTED]
HOME: [REDACTED] CONT: [REDACTED]
BUS: [REDACTED] CELL: [REDACTED]

SERVICE ADVISOR: 8429 KARL SUBKLEW

COLOR	YEAR	MAKE/MODEL	VIN	LICENSE	MILEAGE IN/OUT	TAG
GRAY	12	TOYOTA SEQUOIA	5TDBY5G17CS [REDACTED]		77855/77855	T5768

DEL DATE	PROD. DATE	WARR. EXP.	PROMISED	PO NO.	RATE	PAYMENT	INV. DATE
01JAN12 DD			WAIT 27JAN17		VAR	CASH	26JAN17

R.O. OPENED	READY	OPTIONS:	DLR:
09:07 08DEC16	05:57 26JAN17		[REDACTED]

LINE	OPCODE	TECH	TYPE	HOURS	LIST	NET	TOTAL
EST:	24.95			08DEC16 09:07	SA: 8429		

EST:	26.32			08DEC16 09:07	SA: 8429		
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EST:	15,810.31			07JAN17 15:39	SA: 8429		
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You may receive a survey from Toyota shortly.
Your COMPLETE SATISFACTION is our goal. If for any reason you are dissatisfied with our service, Please contact your Service Advisor with your concerns before mailing your survey
Balise Toyota Staff 413-731-8500



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DESCRIPTION	TOTALS
LABOR AMOUNT	4999.56
PARTS AMOUNT	11794.23
GAS, OIL, LUBE	0.00
SUBLET AMOUNT	0.00
MISC./ENVIR. CHARGES	0.00
TOTAL CHARGES	16793.79
LESS INS./COUPONS	0.00
SALES TAX	0.00
PLEASE PAY THIS AMOUNT	16793.79