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AUG 26 2010

CERTIFIED MAIL RETURN RECEIPT REQUESTED

Adam C. Sloane
Mayer Brown LLP
1999 K Street, N.W.
Washington, D.C. 20006-1101

Re: Toyota Request for Confidential Treatment of April 9, 2010 Supplementary Submission (TQ10-001)

Dear Mr. Sloane:

This responds to your April 23, 2010 letter on behalf of Toyota Motor Corporation ("TMC") and its subsidiaries and affiliates ("Toyota") requesting confidential treatment for information submitted in response to a February 16, 2010 Information Request ("IR") issued by the Office of Defects Investigation. Toyota submitted the information for which it seeks confidential treatment on April 9, 2010 in a CD-ROM entitled "Confidential Toyota TQ10-001 April 9, 2010 Supplement".

You now submit your formal request for confidential treatment and explain that Toyota provisionally marked certain sections of its April 9, 2010 submission as confidential in the expectation of filing a formal request for confidential treatment. On behalf of Toyota you state that after reviewing the April 9, 2010 submission Toyota decided not to seek confidential treatment for all of the information it had previously marked as confidential. Accordingly, you have provided an Excel spreadsheet (TQ10-001 Confidentiality Index Supplemental 02.xls) that sets forth those documents or portions of documents for which Toyota now requests confidential treatment. Toyota requests that the information listed as confidential on the foregoing spreadsheet be accorded confidential treatment permanently.

Toyota recognizes that the information for which it seeks confidential treatment is subject to the substantial competitive harm standard set forth in *Nat'l Parks & Conservation Ass'n v. Morton*, 498 F.2d 765, 770 (D.C. Cir. 1974) and contends that release of the information described above would provide a windfall to Toyota's competitors and be likely to cause the company to suffer substantial competitive harm.

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I note that your submission contains potentially identifying personal information for vehicle owners. Whenever this potentially personally identifying information pertains to individuals rather than entities, the name, address, telephone number, and the last six digits of any vehicle identification numbers will be accorded confidential treatment pursuant to Exemption 6 of the Freedom of Information Act (“FOIA”), 5 U.S.C. § 552(b)(6).

I have decided to grant your request in part and deny it in part.

Your submission contains blank pages – i.e., pages without any markings except for a Bates number and the “Confidential Business Information” mark. Some of these pages are listed as confidential in the TQ10-001 Confidentiality Index 02.xls file. As these blank pages convey no information, your request for confidential treatment is denied for these blank pages wherever they appear.

Several documents for which Toyota requests confidential treatment contain unidentifiable charts, out-of-focus photographs, and unlabeled tables. The agency cannot determine if an item is confidential if it is unable to determine the contents. Accordingly, confidential treatment is denied for the documents and pages in Appendix A.

Also, section 512.4(b) of 49 CFR Part 512 requires that all requests for confidential treatment be accompanied by a certification conforming to the example provided in Appendix A to Part 512. Materials or data generated by, or under the control of, parties other than the submitter must be accompanied by a certification from that entity. *See* 49 CFR 512.9. A number of documents within your submission appear to originate from third parties and are not accompanied by certifications from those entities. Toyota did not submit certifications from:

- The Nielson Company,
- Wheels Inc.,
- Avis Budget Group Inc.,
- Enterprise Holding Co.,
- Hertz Corp.,
- Image Solutions Print & Mail Inc.,
- Intelliseek,
- Aisin AW Co. Ltd.,
- Bergstrom Lexus,
- Lexus of Austin,
- Servco Pacific Inc.,
- Toyota of Des Moines,
- Southeast Toyota Distributors, LLC,
- Stephen Computer Services,
- Thermoflex Corp.,
- Bodycote plc,
- Vi-Chem Corp.,
- Uniform Color Co.,

- B/T Western Corp.,
- Exco Technologies Ltd.,
- R.L.Polk & Co.,
- LaGrange Molded Products Inc.,
- The Stewart Company,
- Pretty Products LLC,
- National Emblem Inc., and
- Nelson Laboratories.

Further, some documents appeared to have been sent to unidentified email addresses. Accordingly, your request for confidential treatment is denied for the documents and pages listed in Appendix B, which originated from third parties. In view of the absence of a certification, the substance of your claim relating to these materials was not reviewed.

The text in Toyota's submission was required to be in English, or Toyota was required to provide a translation for the Japanese language text where it appears. NHTSA's generally applicable regulations, 49 C.F.R. § 551.37, "Language of Communications," provide, in pertinent part: "Communications and attachments thereto shall be in English." Some of the documents submitted by Toyota did not appear to have accompanying English translations. Other documents contained partial or incomplete translations that prevented complete review of the document. We acknowledge that translation of a large volume of documents takes time, but will not grant a request for confidential treatment to materials presented only in a foreign language. Because the information lacked complete translations, your request for confidential treatment for the documents and pages listed in Appendix C is denied and the substance of your claim for these materials was not reviewed.

Toyota was required to submit this information in response to an agency information request. Therefore, I reviewed the claims for confidential treatment under the test set forth in *National Parks & Conservation Ass'n v. Morton*, 498 F.2d 765 (D.C. Cir. 1974) and its progeny. Under the *National Parks* decision, information concerning a commercial or financial matter may be withheld under Exemption 4 of the Freedom of Information Act if disclosure of the information would be likely to cause substantial harm to the competitive position of the submitter, or would be likely to impair the Government's ability to obtain necessary information in the future. *Id.* at 770.

With the exception of the documents discussed above and the documents discussed below, I am granting your request for confidential treatment. The information submitted by Toyota, including but not limited to, summaries of internal analyses, studies, tests, design materials, design changes, design drawings, and cost information, if disclosed, would be likely to cause Toyota to suffer substantial competitive harm. Accordingly, this information will be permanently withheld under Exemption 4 of the FOIA.

Toyota's request seeks confidential treatment for several categories of documents that are publicly available or whose contents are now in the public domain. Among these are accessory catalogs, recall and other communications from Toyota to vehicle owners, documents sent to Canadian regulatory authorities, email exchanges with media members,

communications to Toyota dealers and service and repair information. Insofar as this information is identical to that in the public domain, it is not exempt from disclosure. *Niagara Mohawk Power Corp. v. U.S. Dep't of Energy*, 169 F.3d 16, 19 (D.C. Cir. 1999). Even if not identical, release of this information would not be likely to cause Toyota to suffer competitive harm. Also several documents included in Toyota's request are identical or substantially similar to documents that Toyota did not request be treated as confidential. Accordingly, your request for confidential treatment is denied for the documents and pages listed in Appendix D.

Toyota seeks confidential treatment for a number of documents whose release is not likely to cause substantial competitive harm. These documents include emails and other documents that recount meetings with NHTSA, coordinate meeting times, forward documents, address routine concerns and contain generalized discussions of floor mat and acceleration pedal concerns. These emails and other documents do not contain detailed information about matters such as Toyota's design information, engineering specifications, manufacturing information, costs, or business practices. Since Toyota has not demonstrated that release of this information would be likely to cause it to suffer substantial competitive harm, confidential treatment is denied for the documents and pages in Appendix E.

Subject to the conditions below, this partial grant of confidential treatment will remain in effect for the periods requested.

This partial grant of confidential treatment is subject to certain conditions. The information may be disclosed under 49 CFR 512.22 based upon newly discovered or changed facts, and you must inform the agency of any changed circumstances that may affect the protection of the information. 49 CFR 512.10. If necessary, you will be notified prior to the release of any information under the procedures established by our regulations. 49 CFR 512.22(b).

If you disagree with the partial denial of your request noted above, you may request reconsideration. If you seek reconsideration, your request must be addressed to NHTSA's Chief Counsel and filed within 20 working days after the receipt of this letter. 49 CFR 512.19(a). Any such request should contain additional justification supporting your claims for confidential treatment consistent with 49 CFR Part 512 and applicable case law. Particularly for those documents listed in Appendix E, specific justification on a document-by-document basis or on a grouped listing of like documents is necessary.

Sincerely,

Original Signed By

Otto G. Matheke, III
Senior Attorney

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Items in the appendices with the .pdf extension are entire documents that are denied. Items without the .pdf extension are individual pages that are denied.

APPENDIX A

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Items in the appendices with the .pdf extension are entire documents that are denied. Items without the .pdf extension are individual pages that are denied.

APPENDIX B

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APPENDIX C

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APPENDIX D

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APPENDIX E

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