

TOYOTA
TOYOTA MOTOR NORTH AMERICA, INC.

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July 22, 2005

Mr. Richard Boyd
Chief – Medium and Heavy Duty Vehicle Division
Office of Defects Investigation
National Highway Traffic Safety Administration
400 Seventh St., SW
Washington, DC 20590

Re: NVS-214gtb; EA05-007 & 008

Dear Mr. Boyd:

This letter is being sent in response to your June 1, 2005 letter regarding EA05-007 & 008, an investigation into specific General Motors vehicles. This letter completes our response to your inquiry.

Should you have any questions about this response, please contact Mr. Chris Santucci or Mr. Tsuyoshi Yokoi at (202) 775-1707.

Sincerely,



Chris Tinto
Vice President
TOYOTA MOTOR NORTH AMERICA, INC.

CT:ca
Attachment

Subject Vehicles

MY 1998-2004 Lexus LX470, Toyota Land Cruiser, Tundra and Tacoma vehicles

1. Identify by model, model year, and by manufacturing location, the number of subject vehicles (vehicles equipped with tailgate support cables) that Toyota has manufactured for sale or lease in the United States since model year 1998.

Provide the table in Microsoft Access or Excel 2000, or a compatible format, entitled "Request Number 1 – Toyota, Production Information."

Response 1

The number of the subject vehicles Toyota has manufactured for sale or lease in the United States by model, model year and manufacturing location is provided electronically on CD-ROM, in Microsoft Word 2000 format entitled "Attachment 1.doc".

2. 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, the alleged defect (*) in the subject vehicles received by Toyota since January 1, 1998, pertaining to:
 - a. Consumer complaints, including those from fleet operators;
 - b. Field reports, including dealer field reports;
 - c. Reports involving an injury or fatality, based on claims against the manufacturer involving a death or injury, notices received by the manufacturer alleging or proving that a death or injury was caused by a possible defect in a subject vehicle, property damage claims, consumer complaints, or field reports;
 - d. Reports based on claims against the manufacturer involving a death or injury, notices received by the manufacturer alleging or proving that a death or injury was caused by a possible defect in a subject vehicle, property damage claims, consumer complaints, or field reports;
 - e. Property damage claims; and
 - f. Third-party arbitration proceedings where Toyota is or was a party to the arbitration; and
 - g. Lawsuits, both pending and closed, in which Toyota is, or was, a defendant or codefendant.

(*) ODI has defined the alleged defect as "tailgate support cable breakage." ODI requests that Toyota confine its investigation to complaints that are consistent with this failure mode. Reports of tailgate cable breakage may be described by such terms as, "broken," "fractured," "cracked," "cut," "sheared," "separated," "inoperative," etc. Please exclude complaints pertaining to tailgate cables for such issues as cosmetic appearance, fitment, accidental damage, etc. that do not indicate a broken or compromised tailgate support cable or the imminent possibility that the tailgate support cable may lose load-carrying integrity.

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 are to be counted as a field report and a consumer complaint).

In addition, for items "c" through "g," 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 "f" and "g," 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 this information in Microsoft Access or Excel 2000, or a compatible format, entitled "Request Number Two – Complaint Summary Data."

Response 2

- a. There are 30 consumer complaints that may relate to the alleged defect on the subject vehicles. Since some customers contacted Toyota more than once when complaining about the same incident, the total number of unique incidents in the consumer complaints is 28. In the consumer complaints, there are no reports alleging an injury has occurred.
- b. There are no field reports that may relate to the alleged defect.
- c. There is 1 report alleging an injury has occurred. This report is duplicated in lawsuit information. There are no reports alleging fatality.
- d. There are no property damage claims.
- e. There are no third party arbitration proceedings.
- f. There is 1 lawsuit in which Toyota is a defendant. This incident is alleging an injury has occurred.

The summary description for items "c" through "g" is included in Response 3 as Attachment 2.

3. Separately, for each item (complaint, report, claim, notice, or matter) within the scope of the response to Request No. 2, state the following information:
 - a. Toyota's file number or other identifier used;
 - b. The category of the item, as identified in Request No. 2 (i.e., consumer complaint, field report, etc.);
 - c. Vehicle owner or fleet name (and fleet contact person), address, and telephone number;
 - d. Vehicle's VIN;
 - e. Vehicle's make, model and model year;
 - f. Vehicle's mileage at time of incident;

- g. Incident date;
- h. Report or claim date;
- i. Whether property damage is alleged;
- j. Number of alleged injuries, if any; and
- k. Number of alleged fatalities, if any.

Provide this information in Microsoft Access or Excel 2000, or a compatible format, entitled "Request Number Three – Complaint Details."

Response 3

The information for each item (complaint, report, claim, notice, or matter) is provided electronically on CD-ROM, in Microsoft Access 2000 format entitled "Attachment 2.mdb".

- 4. State, by model and model year, a total count for all of the following categories of claims, collectively, whether reimbursed, adjusted, or not reimbursed by Toyota to date that relate to, or may relate to, the alleged defect (*) in the subject vehicles: warranty claims; extended warranty claims; claims for good will services that were provided; field, zone, or similar adjustments and reimbursements; and warranty claims or repairs made in accordance with a procedure specified in a technical service bulletin or customer satisfaction campaign.

(*) ODI has defined the alleged defect as "tailgate support cable breakage." ODI requests that Toyota confine its investigation to complaints that are consistent with this failure mode. Reports of tailgate cable breakage may be described by such terms as, "broken," "fractured," "cracked," "cut," "sheared," "separated," "inoperative," etc. Please exclude complaints pertaining to tailgate cables for such issues as cosmetic appearance, fitment, accidental damage, etc. that do not indicate a broken or compromised tailgate support cable or the imminent possibility that the tailgate support cable may lose load-carrying integrity.

Separately, for each such claim, state the following information:

- a. Toyota's claim number;
- b. Vehicle owner or fleet name (and fleet contact person) and telephone number;
- c. VIN;
- d. Repair date;
- e. Vehicle mileage at time of repair;
- f. Repairing dealer's or facility's name, telephone number, city and state or ZIP code;
- g. Labor operation number;
- h. Problem code;
- i. Replacement part number(s) and description(s);
- j. Concern stated by customer; and
- k. Comment, if any, by dealer/technician relating to claim and/or repair.
- l. Claim disposition (reimbursed, adjusted, or not reimbursed).

Provide this information in Microsoft Access 2000, or a compatible format, entitled "Request Number Four – Warranty Information."

Response 4

The total counts of warranty claims, extended warranty claims, and claims for good will services paid by Toyota for the subject vehicles that may relate to the alleged defect are provided electronically on CD-ROM, in Microsoft Word 2000 format entitled "Attachment 3.doc".

The detailed information for each claim is provided electronically on CD-ROM, in Microsoft Access 2000 format entitled "Attachment 4.mdb".

5. Describe in detail the search criteria used by Toyota to identify the claims identified in response to Request No. 4, including the labor operations, problem codes, part numbers and any other pertinent parameters used. Provide a list of all labor operations, labor operation descriptions, problem codes, and problem code descriptions applicable to the alleged defect in the subject vehicles.

State, by make and model year, the terms of the new vehicle warranty coverage offered by Toyota on the subject vehicles (i.e., the number of months and mileage for which coverage is provided and the vehicle systems that are covered). Describe any extended warranty coverage option(s) that Toyota offered for the subject vehicles and state by option, model, and model year, the number of vehicles that are covered under each such extended warranty.

Response 5

Toyota searched the warranty database for claims on the subject vehicles by using the part numbers, labor operations and problem codes specified in Attachment 5 stored on CD-ROM in Microsoft Word 2000 format. Toyota then reviewed the claim comments to determine if the claims may be related to the alleged defect. A list of all labor operations, labor operation descriptions, problem codes and problem code descriptions applicable to the alleged defect in the subject vehicles are also provided in Attachment 5.

The terms that Toyota offers for new vehicle warranty coverage on the subject vehicles is 36 months or 36,000 miles for Toyota vehicles and 48 months or 50,000 miles for Lexus vehicles from the vehicle's date-of-first-use, whichever occurs first.

There are some extended warranty coverage options that Toyota offered for purchase with the subject vehicles. Detailed information about these options is provided electronically on CD-ROM, in PDF format entitled "Attachment 6.pdf".

The number of vehicles that are covered under each such extended warranty option is provided

electronically on CD-ROM, in Microsoft Word 2000 format entitled "Attachment 7.doc".

6. List all tailgate support cable part number(s) or the part number of subassemblies containing a tailgate support cable which were sold as replacement parts for the vehicles listed in response to Request No 1, and state the quantity of each aftermarket or replacement tailgate support cable that Toyota has sold by year from 1998 to the present.

Response 6

The list of the tailgate support cable part numbers which sold as replacement parts for the subject vehicles is provided electronically on CD-ROM, in Microsoft Excel format entitled "Attachment 8.doc".

The quantity of each aftermarket or replacement tailgate support cable that Toyota has sold by year from 1998 to the present is provided electronically on CD-ROM, in Microsoft Excel format entitled "Attachment 9.xls".

Data provided in this document is current as of the following dates:

- | | |
|---------------|---|
| Response 2&3: | Customer Complaints (June 29, 2005)
Legal Related Information (July 8, 2005) |
| Response 4&5: | New vehicle warranty (June 17, 2005)
Goodwill service (June 29, 2005)
Extended warranty (June 23, 2005) |
| Response 6: | Number of parts sales (June 18, 2005) |

Attachment 2

The detailed information of each complaint is stored on CD-ROM as an electronic file.

Attachment 3

The total counts of warranty claims, extended warranty claims and good will services paid by Toyota for the subject vehicles that may relate to the alleged defect are stored on CD-ROM as an electronic file.

The number of each warranty claims, which may relate to the alleged defect

Lexus LX470	326	367	0	3	1	0	0
Toyota Land Cruiser	117	116	0	1	0	0	0
Toyota Tacoma	1	2	7	6	9	2	0
Toyota Tundra	-	-	26	9	11	5	3

Attachment 4

The detailed information for each warranty claims, extended warranty claims and good will services is stored on CD-ROM as an electronic file.

Attachment 5

The search criteria used to identify the claims and the list of labor operations, labor operation descriptions, problem codes and problem code descriptions applicable to the subject component in the subject vehicles are stored on CD-ROM as an electronic file.

The search criteria for identifying the claims**List of part Numbers.**

65706-*****	Stay Sub-Assy, Tail Gate
65770-*****	Stay Assy, Tail Gate

List of labor operation codes and labor operation descriptions.

61199	Rear Body Tailgate - Others
64299	Back Door - Others

List of Problem Codes

62	Loosening, Falling off
99	Others

Labor operations, labor operation descriptions, problem codes and problem code descriptions applicable to the subject vehicles are same as the above search criteria.

Attachment 7

The number of vehicles that are covered under the extended warranty by option, model, model year is stored on CD-ROM as an electronic file.

The number of vehicles that are covered under each extended warranty option

LEXUS LX470	1998	319	495	10	505
	1999	762	964	19	983
	2000	1,122	815	17	832
	2001	996	277	4	281
	2002	786	62	2	64
	2003	751	18	0	18
	2004	781	11	1	12
TOYOTA LAND CRUISER	1998	383	1,861	17	1,878
	1999	874	3,168	31	3,199
	2000	1,722	2,770	17	2,787
	2001	1,071	831	1	832
	2002	1,094	375	3	378
	2003	1,278	263	2	265
	2004	1,260	126	2	128
TOYOTA TACOMA	1998	3,069	26,274	306	26,580
	1999	5,790	26,142	302	26,444
	2000	8,110	19,300	149	19,449
	2001	12,905	17,649	93	17,742
	2002	17,029	13,953	81	14,034
	2003	18,185	9,788	46	9,834
	2004	19,159	6,806	44	6,850
	2005				
TOYOTA TUNDRA	2000	8,316	15,696	140	15,836
	2001	7,799	8,838	47	8,885
	2002	12,262	8,588	39	8,627
	2003	14,083	6,789	20	6,809
	2004	13,557	3,858	24	3,882

Attachment 8

The list of the tailgate support cable part numbers which sold as replacement parts for the subject vehicles is stored on CD-ROM as an electronic file.

The List of the tailgate support cable part numbers for the subject vehicles

LEXUS LX470 / TOYOTA LAND CRUISER	65706-60020	STAY SUB-ASSY, TAIL GATE
	65706-60021	
TOYOTA TUNDRA	65770-0C010	STAY ASSY, TAIL GATE
	65770-0C020	
	65770-0C030	
	65770-0C040	
	65770-0C050	
TOYOTA TACOMA	65770-04030	
	65770-04040	

Attachment 9

The quantity of each aftermarket or replacement tailgate support cable that Toyota has sold by year from 1998 to the present is stored on CD-ROM as an electronic file.

Jan-98	0	0	0	0	0	0	0	0	39	0
Feb-98	0	0	0	0	0	0	0	0	48	0
Mar-98	0	0	0	0	0	0	0	0	47	0
Apr-98	0	0	0	0	0	0	0	0	45	0
May-98	0	0	0	0	0	0	0	0	49	0
Jun-98	0	0	0	0	0	0	0	0	57	0
Jul-98	0	0	0	0	0	0	0	0	53	0
Aug-98	0	0	0	0	0	0	0	0	54	0
Sep-98	0	0	0	0	0	0	0	0	69	0
Oct-98	1	0	0	0	0	0	0	0	39	0
Nov-98	0	0	0	0	0	0	0	0	62	0
Dec-98	1	0	0	0	0	0	0	0	58	0
Jan-99	0	0	0	0	0	0	0	0	51	0
Feb-99	0	0	0	0	0	0	0	0	51	0
Mar-99	1	0	0	0	0	0	0	0	57	0
Apr-99	2	0	0	0	0	0	0	0	64	0
May-99	2	0	0	0	0	0	0	0	76	0
Jun-99	1	0	0	0	0	0	0	0	73	0
Jul-99	1	0	3	0	0	0	0	0	97	0
Aug-99	0	10	6	0	0	0	0	0	128	0
Sep-99	0	18	3	0	0	0	0	0	113	0
Oct-99	0	48	11	0	0	0	0	0	114	0
Nov-99	0	77	7	0	0	0	0	0	73	0
Dec-99	0	67	7	0	0	0	0	0	103	0
Jan-00	0	88	9	0	0	0	0	0	110	0
Feb-00	0	91	4	0	0	0	0	0	70	0
Mar-00	0	146	11	0	0	0	0	0	121	0
Apr-00	0	138	13	0	0	0	0	0	128	0
May-00	0	177	4	0	0	0	0	0	150	0
Jun-00	0	237	13	6	6	0	0	0	103	0
Jul-00	0	269	8	7	2	0	0	0	134	0
Aug-00	0	411	9	10	4	0	0	0	185	0
Sep-00	0	364	8	13	5	0	0	0	191	0
Oct-00	0	309	8	7	3	0	0	0	162	0
Nov-00	0	296	4	13	6	0	0	0	171	0
Dec-00	0	219	9	6	3	0	0	0	161	0
Jan-01	0	232	7	14	7	0	0	0	192	0
Feb-01	0	208	5	8	5	0	0	0	183	0
Mar-01	0	172	7	8	6	0	0	0	123	0
Apr-01	0	228	6	6	3	0	0	0	187	0
May-01	0	387	11	20	15	0	0	0	209	0
Jun-01	0	299	4	14	4	0	0	0	260	0
Jul-01	0	380	6	19	16	0	0	0	349	0
Aug-01	0	412	2	27	19	0	0	0	371	0
Sep-01	0	388	2	25	12	0	0	0	369	0
Oct-01	0	415	1	28	12	0	0	0	333	0
Nov-01	0	329	1	21	17	0	0	0	303	0
Dec-01	0	387	0	18	9	0	0	0	264	0
Jan-02	0	335	1	20	16	0	0	0	349	0
Feb-02	0	267	0	20	19	0	0	0	282	0
Mar-02	0	252	0	20	13	0	0	0	277	0
Apr-02	0	290	2	24	13	0	0	0	324	0
May-02	0	353	0	27	21	0	0	0	459	0
Jun-02	0	281	0	22	14	0	0	0	435	0
Jul-02	0	419	0	29	15	0	0	0	473	0
Aug-02	0	324	0	32	17	0	0	0	491	0
Sep-02	0	314	0	34	32	0	0	0	453	0
Oct-02	0	339	0	32	12	0	0	0	503	0
Nov-02	0	287	0	30	16	0	0	0	419	0
Dec-02	0	249	0	26	14	0	0	0	313	0
Jan-03	0	265	0	42	24	0	0	0	424	0
Feb-03	0	177	0	34	27	0	0	0	441	0
Mar-03	0	193	0	26	17	0	0	0	366	0
Apr-03	0	278	0	44	28	0	0	0	544	0
May-03	0	226	0	27	22	0	0	0	599	0
Jun-03	0	256	0	33	23	0	0	0	546	0
Jul-03	0	328	0	61	42	0	0	0	738	0
Aug-03	0	221	0	47	33	0	0	0	866	0
Sep-03	0	189	0	37	25	0	0	0	896	0
Oct-03	0	301	0	55	33	0	0	0	984	0
Nov-03	0	201	0	47	37	0	0	0	763	0
Dec-03	0	143	0	33	25	0	0	0	396	0
Jan-04	0	167	0	36	28	0	0	0	610	0
Feb-04	0	189	0	38	37	1	0	0	558	0
Mar-04	0	216	0	44	36	3	3	0	803	0
Apr-04	0	198	0	40	26	5	3	0	773	0
May-04	0	188	0	59	32	6	4	0	884	0

Jun-04	0	251	0	71	44	1	1	1059	0
Jul-04	0	231	0	54	43	2	3	978	0
Aug-04	0	232	0	48	43	1	2	884	0
Sep-04	0	221	0	78	42	2	4	1151	0
Oct-04	0	132	0	46	39	13	7	903	0
Nov-04	0	168	0	61	34	4	3	1010	0
Dec-04	0	163	0	53	53	3	3	971	2
Jan-05	0	171	0	46	37	5	4	790	6
Feb-05	0	148	0	47	39	5	2	823	3
Mar-05	0	166	0	66	48	5	6	1037	0
Apr-05	0	147	0	70	39	8	8	1093	4
May-05	0	150	0	74	40	6	5	1097	14