

TOYOTA
TOYOTA MOTOR NORTH AMERICA, INC.

WASHINGTON OFFICE
1850 M STREET, NW, SUITE 600, WASHINGTON, DC 20036

TEL: (202) 775-1700
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APR 29 2005

April 29, 2005

Mr. Thomas Z. Cooper
Chief - Vehicle Integrity Division
Office of Defects Investigation
National Highway Traffic Safety Administration
400 Seventh St., SW
Washington, DC 20590

Re: NVS-212pco; PE05-008

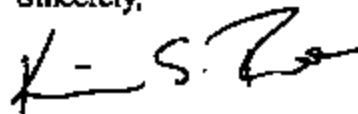
Dear Mr. Cooper:

This letter is being sent in response to your February 25, 2005 letter regarding PE05-008. Per our agreement, this letter completes our response to your inquiry.

Please note that the information included in Attachments 9-1 and 10-1 is confidential. Also, the engineering drawings referenced in response 8 are to remain confidential. Toyota has made a request for the confidential treatment of these documents to the Office of Chief Counsel.

Enclosed you will find two copies of this final response and a CD-ROM containing updates to Attachments 3 and 6, and the supplemental Attachment 7-1. Should you have any questions about this response, please contact Mr. Chris Santucci or Mr. Tsuyoshi Yokoi at (202) 775-1707.

Sincerely,



for

Chris Tinto
Vice President
TOYOTA MOTOR NORTH AMERICA, INC.

CT:cs
Attachment

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WASHINGTON OFFICE
1860 M STREET, NW, SUITE 600, WASHINGTON, DC 20036

TEL: (202) 775-1700
FAX: (202) 463-8513

April 29, 2005

Mr. Otto Matheke, Attorney
Office of Chief Counsel, NCC-110
National Highway Traffic Safety Administration
400 Seventh Street, SW, Room 5219
Washington, D.C. 20590

Subject: NVS-212pc0; PE05-008
Confidential Information

Dear Mr. Matheke:

In accordance with 49 CFR 512.4, enclosed is Toyota's response to NHTSA's February 25, 2005 letter concerning PE05-008, a defect investigation into Toyota Sienna vehicles.

Toyota claims that the information contained in Attachments 9-1 and 10-1 and the engineering drawings referenced in response 8 herein contain confidential information, specifically the detailed engineering information on the process Toyota used in the development and manufacture of the subject vehicles. Toyota considers this information to be proprietary, and reflective of the company's significant technological and intellectual investment, and would not be available to others without similar efforts.

Release of this confidential material would aid Toyota's competitors in learning details of Toyota's specifications, performance requirements, and control strategies for the seat belt system, closely guarded information in the motor vehicle industry. Disclosure of this information would likely result in competitive harm. Therefore, Toyota requests that this material be treated permanently as confidential. Such information has historically been so recognized by the agency, and confidential treatment has been granted.

If this request and supporting affidavit are found to be insufficient to establish Toyota's entitlement to confidential treatment, we ask that, pursuant to 49 CFR 512.19, you afford us the opportunity to supplement this request.

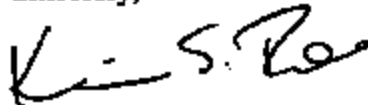
Office of Chief Counsel

April 29, 2005

Page 2

If you have any questions about these materials, please contact Mr. Chris Santucci or Mr. Tsuyoshi Yokoi at (202) 775-1707.

Sincerely,



for

Chris Tinto

Vice President

TOYOTA MOTOR NORTH AMERICA, INC.

CT:cs

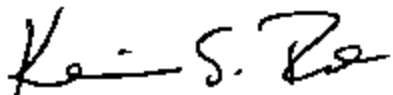
Enclosure

**CERTIFICATE IN SUPPORT OF
REQUEST FOR CONFIDENTIALITY**

I, Chris Tinto, pursuant to the provisions of 49 CFR 512, state as follows:

- (1) I am Chris Tinto, Vice President, Toyota Motor North America, Inc., and I am authorized by Toyota Motor Corporation (Japan) to execute this certificate on its behalf;
- (2) I certify that the information contained in "Attachments 9-1 and 10-1" and the engineering drawings included in the response to NHTSA's February 25, 2005 letter [NVS-212pco; PE05-008] are 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) (as incorporated by reference in and modified by the statute under which the information is being submitted);
- (3) I hereby request that the information contained in "Attachments 9-1 and 10-1" and the engineering drawings be protected permanently;
- (4) This certification is based on the information provided by the responsible Toyota Motor Corporation and affiliate 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 Motor Corporation;
- (5) Based upon that information, to the best of my knowledge, information and belief, the information for which Toyota Motor Corporation and their affiliates have claimed confidential treatment has never been released or become available outside Toyota Motor Corporation or their affiliates;
- (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 Motor Corporation and their affiliates because of unauthorized or inadvertent disclosure (except as stated in paragraph 5); and
- (7) I certify under penalty of perjury that the foregoing is true and correct. Executed on this, the 29th day of April 2005.

Executed on this, the 29th day of April 2005.



for Chris Tinto
Vice President
TOYOTA MOTOR NORTH AMERICA, INC.

Toyota Sienna Seatbelt Investigation (PE05-008)

1. State, by model and model year, the number of subject vehicles Toyota has manufactured for sale or lease in the United States. Separately, for each subject vehicle manufactured to date by Toyota, state the following:
 - a. Vehicle identification number (VIN);
 - b. Make;
 - c. Model;
 - d. Model Year;
 - e. Date of manufacture;
 - f. Date warranty coverage commenced; and
 - g. The State in the United States where the vehicle was originally sold or leased (or delivered for sale or lease).

Provide the table in Microsoft Access 2000, or a compatible format, entitled "PRODUCTION DATA."

Response 1

The subject components are installed on both the 7-passenger and 8-passenger model Sienna vehicles for the 2004 and 2005 model years. On the 7-passenger vehicles, they are found on the RH 2nd row seat. On the 8-passenger vehicles, they are found on the center 2nd row seat. The number of Toyota Sienna vehicles by Toyota has manufactured for sale or lease in the United States is as follows:

Model	Production Facility	Model Year	Total Number of Subject Vehicles	
			7-passenger Model	8-passenger Model
Sienna	Toyota Motor Manufacturing Indiana (U.S.A.)	2004	174,793	40,457
		2005	66,436	16,104

In addition, detailed information for each vehicle is provided electronically on CD-ROM, in Microsoft Access 2000 format entitled "Attachment 1-PRODUCTION DATA (PE05-008)".

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:
 - a. Consumer complaints, including those from fleet operators;
 - b. Field reports, including dealer field reports;
 - c. Reports involving a crash, 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. Property damage claims (including own vehicle); and
 - 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.

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). Identify reports that duplicate other Toyota reports/claims or ODI complaints.

In addition, for items "b" 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 along with any photographs and airbag control module diagnostic result/readout/printout (along with explanation/description). 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.

Response 2

Using the method for tabulation detailed in your question, there are 32 complaint reports that may relate to the alleged defect. Please note that Toyota did not include any consumer complaints where the customer did not actually experience the alleged defect, but had called to complain because they had heard about the issue from other sources.

There are 10 field reports that may relate to the alleged defect.

In the consumer complaints, there are no incidents reported where a vehicle crash was alleged. There are no reports alleging that an injury and/or a fatality had occurred as well.

Toyota has received no property damage claims that may relate to the alleged defect.

There is one buy-back arbitration claim in process that may relate to the alleged defect.

There are no lawsuits in which Toyota is or was a defendant or codefendant.

In addition, Toyota has summarized the consumer complaints relating to the specific descriptions as requested under separate enclosure. Please see "Attachment 2-Consumer Complaints" stored in Microsoft Excel 2000 format on the enclosed CD-ROM.

3. Separately, for each item (complaint, report, claim, notice, or matter) within the scope of your response to Request No. 2, state the following information:
- Toyota's file number or other identifier used;
 - The category of the item, as identified in Request No. 2 (i.e., consumer complaint, field report, etc.);
 - Vehicle owner or fleet name (and fleet contact person), address, and telephone number;
 - Vehicle's VIN;
 - Vehicle's make, model and model year;
 - Vehicle's mileage at time of incident;
 - Incident date;
 - Report or claim date;
 - Whether property damage is alleged;
 - Number of alleged injuries, if any; and
 - Number of alleged fatalities, if any.

Provide this information in Microsoft Access 2000, or a compatible format, entitled "MFR REPORT DATA"

Response 3

The information for each item (complaint, report, claim, or matter) is provided electronically on CD-ROM, in Microsoft Access 2000 format entitled "Attachment 3-REQUEST NUMBER TWO DATA (PE05-008).

It is important to note that this file is incomplete, due to the availability of some of the consumer information. Toyota will update this file with the final submission on April 29.

4. Produce copies of all documents related to each item within the scope of Request No. 2. Organize the documents separately by model, MY and category (i.e., consumer complaints, field reports, etc.) and describe the method Toyota used for organizing the documents.

Response 4

Copies of all consumer complaints (Attachment 2), and all field information (Attachment 4-Field Information) are provided electronically on CD-ROM. In addition, a paper copy of the legal related claim is included as Attachment 5.

5. State, by model and model year, a total count for all of the following categories of claims, collectively, that have been paid 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.

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) (add additional fields/columns as needed);
- j. Concern stated by customer; and
- k. Comment, if any, by dealer/technician relating to claim and/or repair.

Provide this information in Microsoft Access 2000, or a compatible format, entitled "WARRANTY DATA."

Response 5

The total count of the warranty claims paid by Toyota that may relate to the alleged defect on the MY 2004-2005 Toyota Sienna is as follows. All of the affected vehicles are within the original warranty coverage period; there were no extended warranty claims or good will claims.

Model	Model Year	Number of Claims	
		7-passenger Model	8-passenger Model
Sienna	2004	3,062	11
	2005	16	0

The information for each claim is provided electronically on CD-ROM, in Microsoft Access 2000 format entitled "Attachment 6-WARRANTY DATA (PE05-008)".

It is important to note that this file is incomplete, due to the availability of some of the consumer information. Toyota will update this file with the final submission on April 29.

6. Describe in detail the search criteria used by Toyota to identify the claims identified in response to Request No. 5, 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 6

The search criteria used by Toyota to identify the claims is the following:

Toyota searched the warranty database for those claims that replaced part numbers of 71865-***** (bezel clip), 72667-***** (bezel) and 73301-***** (outer seatbelt sub-assembly) on the all MY 2004 and 2005 Sienna's. Toyota reviewed the comments in the claims to determine if it may be related to the alleged defect.

In the data the following labor operation codes were found:

- 71199 (seatbelt: others)
- 71151 (rear seatbelt remove and replacement)
- 71099 (rear seat: others)

The terms that Toyota offers for new vehicle warranty coverage on MY 2004 Sienna vehicles is 36 month or 36,000 miles from the vehicle's date-of-first-use (DFU or DOFU) whichever occurs first

7. Produce copies of all service, warranty, and other documents that relate to, or may relate to, the alleged defect in the subject vehicles, that Toyota has issued to any dealers, regional or zone offices, field offices, fleet purchasers, or other entities. This includes, but is not limited to, bulletins, advisories, informational documents, training documents, or other documents or communications, with the exception of standard shop manuals. Also include the latest draft copy of any communication that Toyota is planning to issue within the next 120 days.

Response 7

Toyota has not issued any service or warranty documents to any dealers, regional or zone offices, field offices, fleet purchasers, or other entities that relate to, or may relate to, the alleged defect in the subject vehicles.

8. Provide diagram(s) outlining the design of the middle-row passenger-side captains chair seat belt guide housing/bezel and the plastic retainer lid. Include part name and part numbers.

Response 8

Copies of the seatbelt "bezel" and "bezel clip" drawings are enclosed.

<Enclosed Drawing Part Numbers>

1. 71865-AB010-B: Bezel Clip
2. 71865-AB010-C: Bezel Clip
3. 71865-AB011: Bezel Clip
4. 72667-AB010-J: Bezel
5. 72667-AB010-K: Bezel
6. 72667-AB011: Bezel

9. Describe all field technical reports (FTR), assessments, analyses, tests, test results, studies, surveys, simulations, investigations, inquiries and/or evaluations (collectively, "actions") that relate to, or may relate to, the alleged defect in the subject vehicles. For each such action, provide the following information:
- a. Action title or identifier;
 - b. The actual or planned start date;
 - c. The actual or expected end date;
 - d. Brief summary of the subject and objective of the action;
 - e. Engineering group(s)/supplier(s) responsible for designing and for conducting the action; and
 - f. A brief summary of the findings and/or conclusions resulting from the action.

For each action identified, provide copies of all documents related to the action, regardless of whether the documents are in interim, draft, or final form. Organize the documents chronologically by action.

Response 9

Toyota has conducted three different investigations. Please see "Attachment 9-1 Investigation Summary".

10. Describe all modifications (including field actions) or changes made by, or on behalf of, Toyota in the design, material composition, manufacture, quality control, supply, or installation of the subject component, from the start of production to date, which relate to, or may relate to, the alleged defect in the subject vehicles. For each such modification or change, provide the following information:
- a. The date or approximate date on which the modification or change was incorporated into vehicle production (includes hardware and/or software changes);
 - b. A detailed description of the modification or change;
 - c. The reason(s) for the modification or change;
 - d. The part numbers (service and engineering) of the original component;
 - e. The part number (service and engineering) of the modified component;
 - f. Whether the original unmodified component was withdrawn from production and/or sale, and if so, when;
 - g. When the modified component was made available as a service component; and
 - h. Whether the modified component can be interchanged with earlier production components.

Also, provide the above information for any modification or change that Toyota is aware of which may be incorporated into vehicle production within the next 120 days.

Response 10

Toyota has introduced a modification as described "Modification #1". In addition, Toyota is planning to introduce another modification as described "Modification #2". Both Modification details are described on "Attachment 10-1 Modification Summary".

11. State the number of each of the following that Toyota has sold that may be used in the subject vehicles by component name, part number (both service and engineering/production), model and model year of the vehicle in which it is used and month/year of sale:
- a. Seat belt guide housing/bezel (p/n 72667);
 - b. Seat belt guide housing/bezel (p/n 71865);
 - c. Seat belt guide cover (p/n 783373)
 - d. Other parts within the guide housing region (specify); and
 - e. Seat belt retractor.

For each of the above parts, identify the seating position and type of seat (i.e. middle-row captain's chair) where the part is installed.

Response 11

Part sales records of the subject vehicle's bezel clip (71865-AE010), bezel (72667-AE010), and outer seatbelt sub-assembly: seat belt retractor (73301-AE010) monthly sales volume is provided electronically in Microsoft Excel 2000 format, and submitted as "Attachment 7-Part Sales History."

The "bezel clip" (71865-AE010) and "bezel" (72667-AE010) are used only use on the MY 2004-2005 Toyota Sienna vehicles equipped with middle row captain's chair type's right side seat (7-passenger models), and with middle row bench seat type's center seat (8-passenger models).

The "outer seatbelt sub-assembly: seat belt retractor" (73301-AE010) is used only use on the MY 2004-2005 Toyota Sienna vehicles equipped with middle row captain's chair type's right side seat (7-passenger models).

Per your request for item "c" above, the seat belt guide cover (p/n 783373), this is not a valid part number used by Toyota. Toyota believes that your office is referring to part number 73373, has provided part sales information as "Attachment 7-1-Part Sales History" in Microsoft Excel 2000 format.

12. For each component part number, provide the supplier's name, address, and appropriate point of contact (name, title, and telephone number). Also identify by make, model and model year, any other vehicles of which Toyota is aware that contain the identical component, whether installed in production or in service, and state the applicable dates of production or service usage.

Response 12

Supplier information for the "bezel clip", "bezel", and "outer seatbelt sub-assembly" is as follows.

Manufacturer Name: Total Interior System-America, LLC
Address: RRI, Box 101, CR100, Princeton, IN 47670
Telephone: (812)-253-7125

13. Produce two of each of the following:

- a. Exemplar samples (cover, guide, bezels etc...) of each design version used throughout the subject vehicles;
- b. Field return samples of the subject component(s) exhibiting the subject failure mode;
- c. Twenty-four inch sample of seat belt webbing material used in the integrated seat; and
- d. Any special tool, fasteners, tie wraps, tapes, and adhesives that have been released, or developed, by Toyota for use in field inspection/repairs which relate, or may relate, to the alleged defect in the subject vehicles. Include all special instructions/operating procedures that were available to the service technician.

Response 13

- a. Toyota has provided two unused current production parts of the "bezel" (72557-AE010), and the "bezel clip" (71865-AE010).
- b. Toyota has provided two field return parts of both the "bezel" (72557-AE010) and the "bezel clip" (71865-AE010).
- c. Toyota has provided two unused current production assemblies of the "seatbelt sub-assembly" (73301-AE010).
- d. Toyota has not released or developed any tools, materials, or instructions/operating procedures for field inspection/repairs which relate, or may relate, to the alleged defect in the subject vehicles.

14. Furnish Toyota's assessment of the alleged defect in the subject vehicle, including:

- a. The causal or contributory factor(s);
- b. The failure mechanism(s);
- c. The failure mode(s);
- d. The risk to motor vehicle safety that it poses;
- e. The reports included with this inquiry.

Response 14

Based upon our internal investigation, Toyota has determined that the subject components are installed in all MY2004/2005 Sienna vehicles, on both 7 and 8 passenger models. The same design for the seat belt bezel is used in the second row for the right hand seat on the 7-passenger model, and the center seat on the 8-passenger model.

If the passenger seated in one of the two seating positions described above turns their upper body toward to left and the back of the vehicle with the seatbelt fastened, a portion of the seatbelt may slide into the split section of the bezel. This can cause the seatbelt to bind. As a result, when the passenger turns their upper body back to their original seating position, some slack in the seat belt may occur. In some instances, if the passenger pulls the seatbelt forward in a certain manner to release the seatbelt slack, the bezel clip may come apart from the bezel.

Once the bezel clip comes apart from the bezel, the split section of the bezel will remain open. If the passenger repeats the same upper body movement as described above, a portion of the seatbelt may fall further into this split section. This can again cause the seatbelt to bind in between the bezel and the seatback, possibly resulting in a slack seatbelt.

If the seat belt becomes stuck in the split portion of the bezel, it is easy for the passenger to rectify the problem. The passenger can pull forward on the belt in such a way that it comes out of the split portion of the bezel. After freeing the belt from the split portion of the bezel, the seat belt continues to operate normally.

In summary, Toyota believes that this phenomenon does not constitute an unreasonable risk to motor vehicle safety for the following reasons:

- When the seatbelt becomes stuck in the bezel and the seatbelt remains slack, it is very easy for any occupant to recognize this condition.
- It is very easy to remove a stuck seatbelt from the bezel.
- Once the belt is freed from the bezel, it can continue to operate normally.

Investigation #1

A. Action Title or Identifier:

Investigation of the dimensional variation of the bezel and bezel clip on production seat assemblies.

B. The Actual or Planned Start Date:

February 9, 2005

C. The Actual or Expected End Date:

February 10, 2005

D. Brief summary of the subject and objective of the action:

Toyota Technical Center, USA ["TTC "] requested that Total Interior System-America ["TISA"] investigate the current production Sienna seats for the dimensional variation of the seat belt covers and clips. A total of 37 seats were measured for specific dimensional information.

Objective:

1. To determine if the production seats were outside of the design tolerance for the bezel and clip assembly.
2. To identify the overall assembly variation in the seat belt bezel and clip.

E. Eng. Group/supplier Responsible for Designing and for Conducting the Action:

Evaluation Design: TTC – Engineering Division #5 ["ED5"]

Evaluation Conducted: TISA – Design Group

F. A Brief Summary of the Finding and/or Conclusion Resulting from the Action:

1. The overall assembly variation was determined.
2. The worst-case assembly condition could fall outside of the design tolerance.

Investigation #2 : Countermeasure parts

A. Action Title or Identifier:

Investigation of current production vehicles at Toyota Motor Manufacturing Indiana ["TMMI."].

B. The Actual or Planned Start Date:

February 18, 2005

C. The Actual or Expected End Date:

February 19, 2005

D. Brief summary of the subject and objective of the action:

TTC Design Group requested that the TMMI Quality Group investigate 100 current production vehicles for rear seat belt retraction issues.

Objective:

1. Study whether the current production vehicles had loose seat belt bezels or clips
2. Study the rear seat belt retraction
3. Study the assembly of the rear seat belt bezels and clips

E. Eng. Group/supplier Responsible for Designing and for Conducting the Action:

Evaluation Design: TTC – ED5

Evaluation Conducted: TMMI – Quality Group

F. A Brief Summary of the Finding and/or Conclusion Resulting from the Action:

After checking 100 vehicles, TMMI reported:

1. No vehicles had seatbelts that became stuck in the bezel slit
2. No vehicles had the bezel clip come out of the bezel
3. Seatbelt retraction was good on all 100 vehicles

A. Action Title or Identifier:

Investigation of a future shape change to the bezel and clip.

B. The Actual or Planned Start Date:

February/Mid/ 2005

C. The Actual or Expected End Date:

March 11, 2005

D. Brief summary of the subject and objective of the action:

Multiple parts were mocked up and studied to determine an option for future design changes.

Objective:

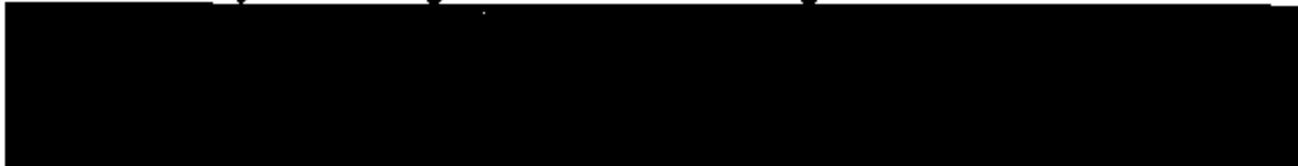
To determine a modified shape to the bezel and clip that would:

1. Eliminate the potential for the binding of the seatbelt into the bezel slit;
2. Ensure good retraction of the seat belt; and
3. Prevent the bezel clip from disengaging under any circumstances.

E. Eng. Group/supplier Responsible for Designing and for Conducting the Action:

Evaluation Design: TTC – ED5

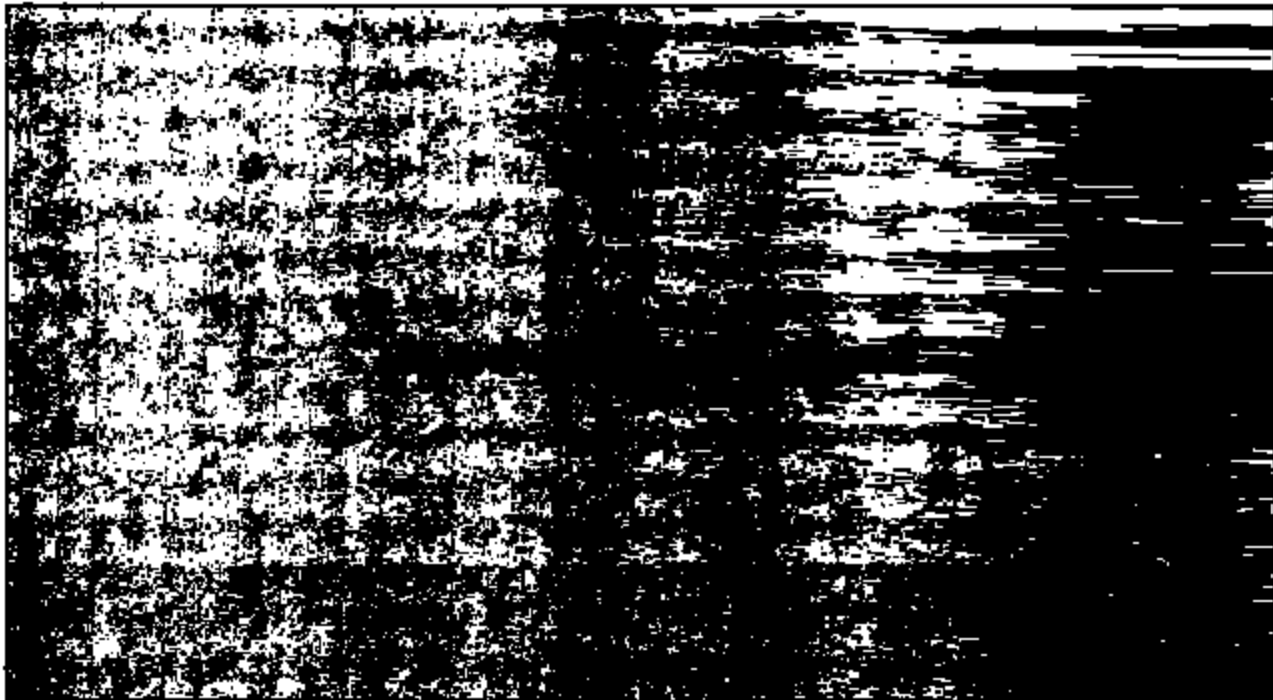
F. A Brief Summary of the Finding and/or Conclusion Resulting from the Action:



Modification #1 (Current level parts)

A. The Date or Approximate Date on Which the modification or Changes was Incorporated into Vehicle Production:

1. Date implemented on production vehicles (TMMI): June 7, 2004
(The change was made prior to an Engineering Change Instruction (ECI) being issued.)
2. The engineering change was issued by TTC on March 3, 2005, in order to update the production drawings (the actual parts already included the detailed changes).



C. The Reason(s) for the Modification or Change:

These shape changes to the Bezel and Clip were coordinated by the Quality Division at TMMI in May of 2004. These changes were not originally issued by an ECI from Toyota's design department. The reason for the ECI is to update the drawings to match the current actual shape of the component parts.

D. The Part Numbers (Service and Engineering) of the Original Component:

Part Number prior to ECI:

71865-AE010-B: Engineering and Production use only. Service part does not have "-B".

72667-AE010-J: Engineering and Production use only. Service part does not have "-J".

E. The Part Numbers (Service and Engineering) of the Modified Component:

Part numbers after ECI:

71865-AE010-C: Engineering and Production use only. Service part does not have "-C".

72667-AE010-K Engineering and Production use only. Service part does not have "-K".

F. Whether the Original unmodified Component was withdrawn from production and/or sale, and if so, when:

As of June 7, 2004, 100% of the bezels and clips produced included these changes.

Production of the previous shape parts was stopped prior to June 7, 2004

G. When the modified component was made available as a service component:

Modified components were available as service parts from June 7, 2004

A bank of service parts at the previous level existed at this time, but a service part disposition was released in June.

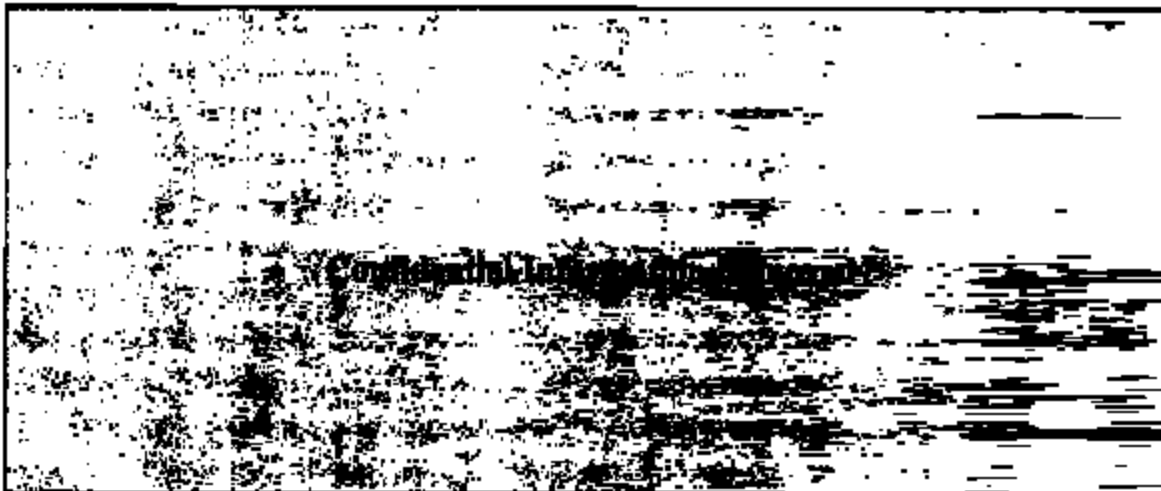
H. Whether the Modified Component can be Interchanged with Earlier Production Components:

Modified components can be interchanged with previous level parts.

Modification #2 : Future ECI

A. The Date or Approximate Date on Which the modification or Changes was Incorporated into Vehicle Production:

Estimated implementation date for production vehicles: Mid-May 2005



C. The Reason(s) for the Modification or Change:

To ensure good retraction of the seat belt and assure that belt cannot bind in the bezel slit.

D. The Part Numbers (Service and Engineering) of the Original Component:

Part Number prior to ECI:

71865-AE010-C: Engineering and Production use only. Service part does not have "-C".

72667-AE010-K: Engineering and Production use only. Service part does not have "-K".

E. The Part Numbers (Service and Engineering) of the Modified Component:

Part numbers after ECI:

71865-AE011

72667-AE011

F. Whether the Original unmodified Component was withdrawn from production and/or sale, and if so, when:

Estimated Mid-May 2005 for implementation of new parts.

Production of old level parts will be stopped on same date as the implementation of new parts.

G. When the modified component was made available as a service component:

Estimated date: Mid-May, 2005

All old level service parts will be eliminated and replaced with latest level parts

H. Whether the Modified Component can be Interchanged with Earlier Production Components:

New level parts can be interchanged with MY2005/MY2004 Sienna (prior to the introduction of [REDACTED] as a set of the "new bezel" (72667-AE011) and the "new bezel clip" (71865-AE010).