

TOYOTA
TOYOTA MOTOR NORTH AMERICA, INC.

WASHINGTON OFFICE
1850 M STREET, NW, SUITE 800, WASHINGTON, DC 20036

TEL: (202) 775-1707
FAX: (202) 463-8513

April 15, 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

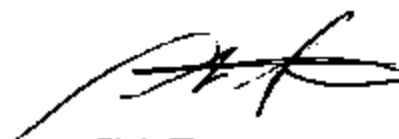
Re: NVS-212pcc; PE05-008

Dear Mr. Cooper:

This letter is being sent in response to your February 25, 2005 letter regarding PE05-008. Per our agreement, Toyota is submitting its response to Questions 1 through 6 and Questions 11 through 12 of your inquiry under this cover, with the remainder of the response to be sent under separate cover on April 29, 2005. Also, due to the late availability of some consumer information and part sales information, we will be supplementing the responses to Questions 3, 5, and 11 with the remainder of our response.

Enclosed you will find two copies of this partial response and two CD-ROM's containing electronic versions of the attachments. 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:cs
Attachment

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 number of MY 2004 Toyota Sienna vehicles equipped with middle row captain's chairs (7-passenger models) Toyota has manufactured for sale or lease in the United States is as follows:

Model	Model Year	Produced Plant	Total Number of Produced Vehicle
Sienna	2004	Toyota Motor Manufacturing Indiana (U.S.A.)	174,793

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 1 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:
 - 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 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
Sienna	2004-2005	3,089

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 will respond to this inquiry on April 29.

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

Toyota will respond to this inquiry on April 29.

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 will respond to this inquiry on April 29.

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 will respond to this inquiry on April 29.

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-AB010), 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-AB010) 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, and will provide part sales information in our final response on 4/29.

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

Toyota will respond to this inquiry on April 29.

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

Toyota will respond to this inquiry on April 29.