

TOYOTA
TOYOTA MOTOR NORTH AMERICA, INC.

WASHINGTON OFFICE

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September 22, 2006

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

Subject: NVS-212lhs; PE06-024
Confidential Information

SEP 25 2006
NHTSA
20590
OFFICE OF CHIEF
COUNSEL

Dear Mr. Cooke:

In accordance with 49 CFR 512.4, enclosed is Toyota's response to NHTSA's July 12, 2006 letter concerning PE06-024, a defect investigation into Scion tC vehicles.

Toyota claims that the marked portions of the information contained in "Attachment-Response 8" herein contains confidential information, specifically detailed engineering information on the glass panels of the moonroof, including quality control procedures, design specifications, performance requirements, and proprietary test protocols used in 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 test methodologies for the panoramic glass roof 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.

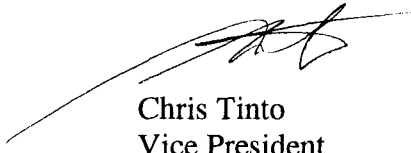
If this request and supporting affidavit are found to be insufficient to establish Toyota's entitlement to confidential treatment, we ask that, pursuant to 49 CFR 512.19, you afford us the opportunity to supplement this request.

Office of Chief Counsel
September 22, 2006
Page 2

Enclosed you will find three sets of documents and a table identifying the confidential material via a numbering system. Please use the ID and Request Numbers on each page to identify the specific justifications for the requests. Per 49 CFR 512, one set of documents contains the complete response including confidential information, one contains the response with the confidential information removed, and one contains only the confidential information.

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

Sincerely,



Chris Tinto
Vice President
TOYOTA MOTOR NORTH AMERICA, INC.

CT:cs
Enclosure

ATTACHMENT-RESPONSE 8

Page ID#	Request Number	Justification for Request
AR8-1	001	This section includes the frequency and type of quality inspections that are performed. It identifies our conclusions and the evaluation criteria used in the analysis of the operating environment of the moonroof. In addition, the maximum impact speed of a proprietary test protocol is identified in the summary.
AR8-2	001	This section includes details regarding the manufacturing process, including test protocols, specifications, and the order of the processes.
	002	This section identifies the different materials and their inspection protocols, and their respective usage within the proprietary process.
AR8-3	001	Identifies the results of the proprietary test protocol
	002	Identifies the stress on the glass panels and their respective locations, includes design and performance criteria.
AR8-4	001	Describes the test piece characteristics used in the proprietary test protocol
	002	Describes the test piece characteristics used in the proprietary test protocol
	003	Describes the test methodology for the proprietary test protocol
	004	Describes the impact point and direction of the test piece used in the proprietary test protocol
	005	Describes the speed of the test piece and the results of the proprietary test protocol
	006	Identifies the results and highest speed used in the proprietary test protocol
	007	Identifies the cross car locations of the impact points used in the proprietary test protocol

NOTE: Marked portions of the enclosed documents are identified by the Page ID and Request Number at each location. Each Page ID number is located at the bottom of each page of the attachment.

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 "Attachment-Response 8" in the response to NHTSA's July 12, 2006 letter [NVS-212lhs; PE06-024] is 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 "Attachment-Response 8" 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 22nd day of September 2006.

Executed on this, the 22nd day of September 2006.



Chris Tinto
Vice President
TOYOTA MOTOR NORTH AMERICA, INC.