

TOYOTA
TOYOTA MOTOR NORTH AMERICA, INC.

Handwritten: 7/19/06

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July 14, 2006

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

Faint vertical stamp: RECEIVED
NHTSA
OFFICE OF DEFECTS INVESTIGATION
JUL 19 2006

Re: NVS-212pco; EA06-001PIR

Dear Mr. Cooper:

This letter is being sent in response to your May 16, 2006 letter regarding EA06-001. Toyota is providing peer vehicle data on the Scion tC and the Lexus RX vehicles in order to assist in your investigation of the sunroof glass panels of the Cadillac SRX.

Enclosed you will find two copies of this response, including two CD-ROMs that contain all of the attachments. Should you have any questions about this response, please contact Mr. Chris Santucci of my staff at (202) 775-1707.

Sincerely,



Chris Tinto
Vice President
TOYOTA MOTOR NORTH AMERICA, INC.

CT:cs
Enclosure

1. State, by model, model year and each sunroof configuration, the number of subject peer vehicles Toyota has manufactured for sale or lease in the United States.

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

Response 1

The number of MY 2005-2006 (until June 6, 2006) Scion tC and MY 2004-2006 Lexus RX vehicles equipped with a panoramic sunroof system Toyota has manufactured for sale or lease in the United States by model, model year and sunroof configuration is provided electronically on CD-ROM in Microsoft Excel format entitled "PRODUCTION DATA.xls" stored in the folder "Attachment-Response 1".

2. State the number of each of the following (in a table format) by each model, model year, sunroof configuration and the specific sunroof section or panel, received by Toyota, or of which Toyota is otherwise aware, which related to, or may related to, the subject condition in the subject peer 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 report, 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 consumer complaint, field report (duplicate) and a crash report (duplicate)), but the duplicated reports shall be identified.

Provide the table in Microsoft Access 2000, or a compatible format, entitled "MANUFACTURER REPORT COUNT."

Response 2

The total count of the unique incidents in the consumer complaints and field reports by each model, model year, sunroof configuration and the specific sunroof section or panel, which may relate to the subject condition in the Scion tC vehicles is provided electronically on CD-ROM in Microsoft Excel 2000 format entitled "MANUFACTURER REPORT COUNT.xls" stored in the folder "Attachment-Response 2".

There are no consumer complaints and field reports that may relate to the subject condition in the Lexus RX vehicles.

The total count of the unique incidents in the consumer complaints for the Scion tC vehicles which have been reported where an injury was alleged is also provided in the electronic file mentioned above.

There are no reports alleging a crash or a fatality had occurred.

In addition, there are no property damage claims, third party arbitration proceedings and lawsuits in which Toyota is defendant, which may relate to the subject condition in the subject peer vehicles.

3. State, by each model, model year, sunroof configuration and the specific sunroof section or panel, the 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 subject condition in the subject peer 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. Do not count the claim if it is a duplicate of a subpart report in question 2.

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

Response 3

The total count of warranty claims and claims for good will services paid by Toyota for the subject vehicles that may relate to the subject condition in MY 2005-2006 Scion tC vehicles by model year sunroof configuration and the specific sunroof section are provided electronically on CD-ROM, in Microsoft Excel 2000 format entitled "WARRANTY DATA.xls" stored in the folder "Attachment-Response 3". There are no extended warranty claims that may be related to the subject condition in the Scion tC vehicles. In addition, there are no warranty claims, extended warranty claims, or claims for good will services that may relate to the subject condition in the Lexus RX vehicles.

4. Describe in detail the search criteria used by Toyota to identify the claims identified in response to Request No.3, 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 subject condition in the subject peer vehicles. State, by make and model year, the term of the new vehicle warranty coverage offered by Toyota on the overall subject vehicle, on glass breakage in the side windows and glass breakage in the sunroof system (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 peer vehicles and state by option, model, and model year, the number of vehicles that are covered under each such extended warranty.

Response 4

Toyota searched the warranty database for those claims that replaced any of the glass panels identified in the Microsoft Excel file entitled "Search Criteria, Operation & Problem Codes.xls" stored in the folder "Attachment-Response 4" on CD-ROM. Toyota then reviewed the claim comments to determine if the claims may be related to the subject condition and to identify which glass panel was involved.

In addition, a list of all labor operations, labor operation descriptions, problem codes and problem code descriptions identified in these warranty claims are also provided in the same Microsoft Excel file described above.

The terms that Toyota offers for new vehicle warranty coverage is 36 months or 36,000 miles on MY 2005-2006 Scion tC vehicles and 48 months or 50,000 miles on MY 2004-2006 Lexus RX vehicles from the vehicle's date-of-first-use, whichever occurs first.

5. For each glass panel utilized (from front to rear of vehicle) in the subject vehicle, provide the following information:
 - a. Formal item name;
 - b. Common item name;
 - c. Movable or Fixed glass panel system;
 - d. Single or multiple panel design (state no. of panels);
 - e. Type of movable glass panel deployment design (i.e., Slide-in-Roof; Titled and Slide over roof; Titled, Slide and Stacked (for sectioned design), etc.);
 - f. Interior opening beneath glass panel area (length x width across roof in centimeters);
 - g. Location of glass panel (i.e., "over 1st -row occupants", "over 2nd -row occupants", "over 1st & 2nd -row occupants," etc...);
 - h. Size of panel (length x width centimeters);
 - i. Thickness of glass (millimeters);

- j. Weight of glass panel (kilograms);
- k. Type of glass used (i.e. laminated, tempered, tempered-laminated, multiple glazed unit, rigid plastics, etc... as classified in ANSI/SAE Z26.1)
- l. Certified to ANSI/SAE Z26.1, Item 3/4 Glazing Material Standard (specify all applicable Table 1 Tests);
- m. Provide any impact test results per ANSI/SAE Z26.1 Test No. 6-14 or per other standards if available;
- n. ANSI/SAE Z26.1 certification marking (i.e. AS1, AS2 etc.) if any; and
- o. Explain the reasons for selecting the type, thickness, and other relevant aspects of the glass used in the subject component in comparison with other types, thicknesses, and other relevant aspects of glass, which were considered or which could have been used.

Response 5

Responses to the subparts are provided electronically on CD-ROM in Microsoft Excel format entitled "Attachment-Response 5.xls" and "Attachment-Response 5-1.xls" through "Attachment-Response 5-5.xls", stored in the folder "Attachment-Response 5".

- 6. Provide photographs showing an exterior top view looking down at the vehicle's entire roof section. If the glass panel opens, provide photographs for both the close position and the open position. In addition, show wide-angled interior views looking up at the entire roof liner, with all shades opened, with the glass roof panels in the close position and in the open position. Provide minimum of two pictures each originating from two opposite angles for resolution of 2,500 x 2,000 pixels each and 2.0MB size.

Response 6

The requested photographs are provided electronically on CD-ROM in "JPG" format stored in the folder "Attachment-Response 6".

- 7. For each model, model year and glass panel design on the subject peer vehicles, identify the part number, supplier name and a complete street address, contact name, and telephone number.

Response 7

The information regarding the supplier for each glass panel design on the subject peer vehicles is provided electronically on CD-ROM, in Microsoft Excel 2000 format entitled "Supplier Information.xls", stored in the folder "Attachment-Response 7".

* * *

Regarding privileged documents that may be responsive to this information request, Toyota understands that it is acceptable to the Agency at this stage for Toyota to identify categories of privileged documents rather than any specific document within those categories. These categories include (a) communications between outside counsel and employees of Toyota's Law Department, other Toyota employees, or employees of parties represented by Toyota in litigation or claims; (b) communications between employees of Toyota's Law Department and other Toyota employees or employees of parties represented by Toyota in litigation or claims; (c) notes and other work product of outside counsel or employees of Toyota's Law Department, including work product of employees or consultants done for or at the request of outside counsel or Toyota's Law Department. For any privileged documents that are not covered by these categories, if any, Toyota will provide a privilege log identifying any such documents under separate cover. Toyota is not claiming a legal privilege for any documents provided with this response; however, Toyota does not waive the legal privilege or work product protection with respect to other documents that may have been prepared in connection with a specific litigation or claim. In addition, Toyota may assert the attorney client privilege or claim protection under the work-product doctrine for analyses or other documents that may be prepared in connection with litigation or claims in the future.

Toyota understands that NHTSA will protect any private information about persons that is contained in the Attachments to this response, based on privacy policy considerations. Such private information includes data such as names, addresses, phone or fax numbers, email addresses, license plate numbers, driver's license numbers and last 4 digits of the vehicle's VIN.

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

- Response 1 : Production Data (June 6, 2006)
- Response 2 : Consumer complaint (June 9, 2006)
Field Report (July 5, 2006)
- Response 3 : Warranty claims (June 7, 2006)
Goodwill (June 14, 2006)