

TOYOTA

TOYOTA MOTOR NORTH AMERICA, INC.

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September 30, 2008

Mr. Jeffrey Quandt, Chief
Vehicle Control Division (NVS-213, Rm W48-312)
NHTSA, Office of Defects Investigation
1200 New Jersey Avenue, SE
Washington, DC 20590

Re: NVS-213aan; PE08-041

Dear Mr. Quandt:

This letter is being sent in response to your July 24, 2008 letter regarding PE08-041. Per our agreement, this letter completes our response to your inquiry. Please note that Toyota considers certain information within the attachments to be confidential, and has requested confidential treatment for this material from the Office of Chief Counsel. We are including hard copies of this material in redacted format. 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 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. Model;
 - c. Engine;
 - 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." See Enclosure 1, Data Collection Disc, for pre-formatted table which provides further details regarding this submission.

Response 1

The number of MY 2004-2006 Toyota Sienna manufactured for sale or lease in the United States by model and model year is as follows:

	2004 MY	2005 MY	2006 MY	Total
Sienna	216,015	170,784	198,429	585,228

In addition, the detailed information responsive to "a" through "g" is provided electronically on CD-ROM in Microsoft Access 2000 format entitled "PRODUCTION DATA (PE08041).mdb" stored in the folder "Attachment-Response 1."

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. Owner, consumer, and fleet reports or complaints where speed at failure was 20 mph or greater;
 - d. Owner, consumer, and fleet reports or complaints where speed at failure was less than 20 mph;
 - e. Owner, consumer, and fleet reports or complaints where speed at failure was unknown;
 - f. 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;
 - g. Property damage claims; and
 - h. Third-party arbitration proceedings where Toyota is or was a party to the arbitration; and
 - i. Lawsuits, both pending and closed, in which Toyota is or was a defendant or codefendant.

For subparts "a" through "h" 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).

In addition, for items "f" through "i," 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 "h" and "i," 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 methodology described in your question above, the number of reports which relate to, or may relate to, the alleged defect on the subject vehicles are provided electronically on CD-ROM in Microsoft Excel 2000 format entitled "Total Count for Reports.xls" stored in the folder "Attachment-Response 2".

Toyota included the reports which do not clearly describe that the steering intermediate shaft is a cause of the incidents. As a result of our analysis, nearly half of the consumer complaints do not mention any component which may cause the incident. It is also unclear if cases reporting accidents may have been caused by the subject component. There were no problems with normal operation of the steering system on the vehicles involved in the legal related claims.

In addition, the Excel file described above has two charts on two sheets. One chart shows the number of reports which may relate to (1) through (3) of the alleged defect, i.e., "(1) steering intermediate shaft binding or locking" or "(2) corrosion of the steering intermediate shaft universal joint" or "(3) complaints of increased effort to turn the steering wheel from neutral or return to neutral after turning (e.g., hard steering or steering binding)". The other one shows the number of reports which may relate to (4) of the alleged defect, i.e., "(4) noise while steering". Toyota classified the alleged defect in this response because Toyota has experienced a specific noise issue on the steering intermediate shaft, not on the lower universal joint, but on the dust boot and slip joint on the 2004MY Sienna vehicles. Please refer to the Technical Service Bulletin provided in Response 7.

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 a crash is alleged;
 - j. Whether a fire is alleged;
 - k. Whether property damage is alleged;
 - l. Number of alleged injuries, if any; and
 - m. Number of alleged fatalities, if any.

Provide this information in Microsoft Access 2000, or a compatible format, entitled "REQUEST NUMBER TWO DATA." See Enclosure 1, Data Collection Disc, for a preformatted table which provides further details regarding this submission.

Response 3

The information "a" through "m" for each item (complaint, report, claim, notice, or matter) is provided electronically on CD-ROM in Microsoft Access 2000 format entitled "REQUEST NUMBER TWO DATA (PE08041).mdb" stored in the folder "Attachment-Response 3".

This Access file has two tables: One for items (1) through (3), and one for item (4) of the alleged defect.

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

Response 4

Lists of the consumer complaints, the copies of the field reports, and the documents related to the legal related claims are all provided electronically on CD-ROM in Microsoft Excel 2000, Word 2000 or PDF format stored in the folder "Attachment-Response 4."

Copies of each category are classified in (1) through (3) and (4) of the alleged defect. (Two lists of consumer complaints are provided in the Excel file entitled "Consumer Complaint.xls" stored in the sub-folder "Consumer Complaint." The copies of the field report are divided into two folders stored in sub-folder "Field Report." The copies of the documents for the legal related claims are provided in one folder stored in the sub-folder "Legal Related Claims." There is no legal related claim related to (4) of the alleged defect.)

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);
- 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." See Enclosure 1, Data Collection Disc, for a pre-formatted table which provides further details regarding this submission.

Response 5

The total count of warranty claims, extended warranty claims and claims for good will services paid by Toyota for the subject vehicles that relate to, or may relate to the alleged defect are provided electronically on CD-ROM in Microsoft Excel 2000 format entitled "Total Count for Claims.xls" stored in the folder "Attachment-Response 5".

The detailed information for each claim is also provided electronically on CD-ROM in Microsoft Access 2000 format entitled "Warranty Data (PE08041).mdb" stored in the folder "Attachment-Response 5".

The total count of claims and the detailed information for each claim are classified by items (1) through (3) and item (4) of the alleged defect. As such, the Excel file includes two sheets and the Access file includes two tables.

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 any of the parts identified in Microsoft Excel file entitled "Search Criteria, Operation & Problem Codes.xls" stored in the folder "Attachment-Response 6" on CD-ROM. Toyota then reviewed the claim comments to determine if the claims may relate to the alleged defect. 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 on MY 2004-2006 Sienna vehicles is as follows;

For the Steering intermediate shaft

36 months or 36,000 miles 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 "Extended Warranty Option.pdf" stored in the folder "Attachment-Response 6."

The number of vehicles that are covered under each such extended warranty option, by option, model, and model year is provided as "Attachment-Response 6-1". Please note that this "Attachment-Response 6-1" contains trade secret and commercial information, therefore, Toyota believes that this document must be afforded confidential treatment. A request for confidential treatment of this document has been sent to the Office of Chief Counsel. A public version of this document is included with this response.

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 issued two service bulletins that may relate to the alleged defect. Copies of the service bulletins are provided electronically on CD-ROM in PDF format stored in the folder "Attachment-Response 7". One is related to (4) of the alleged defect. The other is related to (1) through (3) of the alleged defect.

8. Describe all 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 that have been conducted, are being conducted, are planned, or are being planned by, or for, Toyota. 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 8

Toyota has summarized in a table the actions that relate to (1) through (3) of the alleged defect. We are providing this information as "Attachment-Response 8" stored in the folder on CD-ROM. All of the documents related to these actions are being provided within "Attachment-Response 8." Please note that the documents provided in this portion of the response are confidential, and a request for confidential treatment has been submitted to the Office of Chief Counsel. A public version of these documents is included with this response to your office, provided on CD-ROM, in the folder "Attachment-Response 8." Please see the Office of Chief Counsel for the confidential version of these documents.

9. Describe all modifications 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;
- b. A detailed description of the modification or change;
- c. The reason(s) for the modification or change;
- d. The part number(s) (service and engineering) of the original component;
- e. The part number(s) (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 9

Toyota has summarized in a table all modifications or changes made by Toyota, or on behalf of Toyota in the design, material composition, manufacture, quality control or installation, which relate to (1) through (3) of the alleged defect in the subject vehicles. We are providing this information as "Attachment- Response 9." Please note that some of the information included in "Attachment-Response 9" is confidential, and a request for confidential treatment has been submitted to the Office of Chief Counsel. A public version of "Attachment-Response 9" is included with this response to your office, provided on CD-ROM stored in the folder "Attachment-Response 9." Please see the Office of Chief Counsel for the confidential version of this document.

10. Produce:

- a. One exemplar sample of each design version of the subject component;
- b. Three field return samples of the subject component exhibiting the subject failure mode; and
- c. Any kits that have been released, or developed, by Toyota for use in service repairs to the subject component/assembly which relate, or may relate, to the alleged defect in the subject vehicles.

Response 10

There are no kits of subject component. Samples will be provided under separate cover.

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 (including the cut-off date for sales, if applicable):

- a. Subject component; and
- b. Add any further requests or delete all, including requests for similar or substantially similar components; and
- c. Any kits that have been released, or developed, by Toyota for use in service repairs to the subject component/assembly.

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 11

The number of the subject component that Toyota has sold that may be used in the subject vehicles are provided electronically on CD-ROM in Microsoft Excel 2000 format entitled "Number of components sold in the US .xls" stored in the folder "Attachment-Response 11".

In addition, the supplier's name, address, and appropriate point of contact (name, title, and telephone number) for the subject component part number are also provided electronically in Microsoft Excel 2000 format entitled "Supplier Information .xls".

As for other vehicles which contain the identical component, Toyota is providing make, model, model year and the applicable dates of production electronically in Microsoft Excel 2000 format entitled "Other vehicles using identical parts.xls".

12. 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. What warnings, if any, the operator and the other persons both inside and outside the vehicle would have that the alleged defect was occurring or subject component was malfunctioning; and
- f. The reports included with this inquiry.

Response 12

Overview

Since 2005, Toyota has been investigating reports of increased steering effort on the subject vehicles. In July of 2006, it was determined that a combination of thermal damage and subsequent water intrusion could lead to corrosion of the lowermost universal joint installed on the steering intermediate shaft. Production was changed in September of 2006, and a service bulletin to dealers was issued in January of 2007. However, before the investigation into increased steering effort, in February of 2004, Toyota issued a different service bulletin to dealers regarding popping and clicking noises heard while turning the vehicle. Both service bulletins involved the removal and replacement of the steering intermediate shaft. At this time, Toyota has not determined that a defect exists in the steering system of the Toyota Sienna vehicles. Both issues, noise and corrosion, are minor inconveniences that in no way affect motor vehicle safety.

Design

For all of the subject vehicles, there are two steering intermediate shaft assemblies. One assembly is used on the 2WD models, while the other is used on the 4WD models. Each assembly consists of the shafts connected with two universal joints. The lowermost universal joint is located in the engine room, while the uppermost universal joint is located inside the passenger compartment, behind the dashboard. Where the intermediate shaft passes through the bulkhead, a rubber grommet resides. As such, the lowermost universal joint is subject to more severe environmental conditions, including heat from the engine/exhaust and road/salt spray. The design of the lowermost universal joint is typical of those found in similar vehicles.

The components of the universal joint that will be discussed in the next section are the spider, the needle bearing, and the thrust piece. The spider is the "plus (+)" shaped component that transfers the torque from one shaft portion to the next. The needle bearings connect to the four arms of the spider, allowing rotation between the spider and the clevis. The thrust piece is made of resin, and is compressed at the end of the arms of the spider. The thrust piece is used to retain tension in the arms of the spider in order to avoid backlash when rotating the shaft.

Analysis of the Failure Mode

For the purpose of this inquiry, this response will focus on the failure mode caused by corrosion. Toyota's analysis found that the lowermost universal joint of the intermediate shaft can be affected by corrosion based on a number of environmental factors. Initially, if the vehicle is left idling for a period of time, the universal joint can be affected by engine room heat. Toyota measured temperatures at the lowermost universal joint that were near the upper limit of the material specification for the resinous thrust piece described above. If the thrust piece material is compromised by high temperature, when the steering wheel is turned, compressive loads on it can cause deformation. This deformation can lead to a compromise of the seal on the needle bearing. If water, especially water contaminated with road salt, is present at the time, it can intrude into the needle bearing and corrosion can ensue. As the corrosion develops, the rolling resistance of the needle bearing increases, which can cause the movement of the universal joint to become slightly less smooth than normal. Because of the nature of corrosion, it will of course expand gradually. As this occurs, steering effort will also gradually increase.

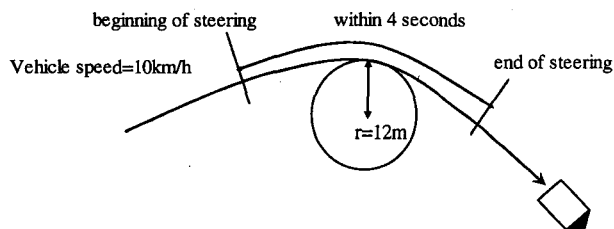
Effect on Driver Input – Steering Effort

Toyota carefully evaluated the corrosion issue's affect on steering effort. As mentioned above, the corrosion of the lowermost universal joint occurs gradually. As the corrosion develops, steering effort gradually increases. At some point, this increase in effort becomes noticeable to the operator. Although the vehicle can still be easily steered at this point, once noticeable, owners recognize that there is an issue and bring the vehicle in for service. Toyota has never identified a vehicle in the field with a locked or seized steering system caused by the corrosion of the universal joint in the course of its investigation, such as during the evaluation of warranty return parts and the Go-and-See activities.

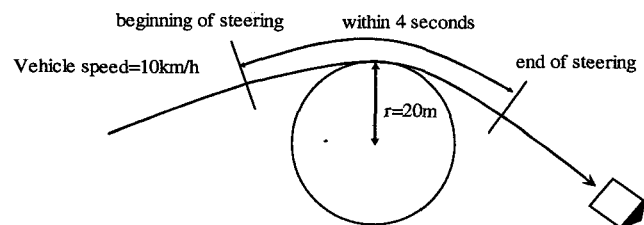
But in order to compare the effect on steering effort, Toyota has conducted some measurements to offer some perspective. With the vehicle at rest, normal steering effort to turn the wheels from lock to lock varies around 2.3 kgf. In the one vehicle which has exhibited the highest steering effort Toyota has found to date, effort varies from about 2.1 kgf to 5.2 kgf from lock to lock. The increased effort peaks twice over a 360 degree rotation of the steering wheel. However, once the vehicle is in motion, this effort reduces somewhat. But compared to a full loss of power assist, this increase is insignificant. Toyota's measurements for a Sienna at rest with no power steering assist varies from 3.3 to 4.9 times higher than the one vehicle found exhibiting universal joint corrosion with the highest steering effort: 17.0 to 25.5 kgf.

While steering effort is not regulated in the United States, the European Union (through the United Nations) has ECE 79 for vehicles sold in those countries. As prescribed in ECE 79, a vehicle of the Sienna class (M1) would need to maneuver into a 12 m turning circle by steering the vehicle within 4 seconds with a steering input force of less than 15 daN with a normally functioning power steering system and into a 20 m turning circle within 4 seconds with a steering input of less than 30 daN when the system has failed.

ECE 79 Steering Effort Test



Intact Steering (15 daN max.)



Failed Steering (30 daN max.)

Toyota conducted a similar test for a normally functioning power steering on a test vehicle with the intermediate shaft which exhibited the highest steering effort described above. For the test, the vehicle is loaded to the Gross Vehicle Weight Rating (GVWR) with the front axle is loaded to its rated capacity. Force measurements are calculated at the steering wheel rim. The vehicle speed is very low, 10 km/hr, and maneuvers into a 10 m turning circle instead of 12 m turning circle. The resulting steering effort was measured at maximum 3.28 daN, which fully complies with the regulation for a normally functioning steering system prescribed in ECE 79 with ample margin (78%).

Risk to Motor Vehicle Safety

When considering the nature of the failure mode, the conditions in which it occurs, and the increase in vehicle steering effort that results, at this time, Toyota has not determined the existence of a safety related defect in the Toyota Sienna steering system. In this response, we submitted information regarding 73 reports related to alleged defects 1 through 3 (binding, corrosion, or increased effort). These 73 reports were made on 70 unique vehicles. We also submitted information regarding 161 reports related to alleged defect 4 (noise). These 161 reports were made on 152 unique vehicles.

While reports of noise may be an indication of a corroding universal joint, due to the service bulletin issued specifically in regards to noise (an entirely different issue), these reports are less likely to be related to corrosion. For the 70 vehicles in which binding, corrosion, or increased effort was noted, 4 crashes were reported. Regarding the 70 vehicles, in the subject population of approximately 550,000 vehicles built before the production change in September 2006, this equates to an extremely low rate of occurrence of 0.013%. Regarding the 4 crashes reported, it is highly unlikely that any of these reports are related to increased steering effort due to universal joint corrosion. Three of these reports indicate a simultaneous failure of the braking system combined with a locked steering wheel. Two of those reports noted that the vehicle was traveling at a high rate of speed at the time (one on a wet roadway); in such instances, large effort steering inputs are generally not performed. Of the third case, which alleges locked steering and failure of the braking system occurred while the operator was pulling into a parking space, this vehicle was inspected by Toyota and didn't exhibit any issues with either the steering or the braking systems. There is limited information regarding the fourth report of a crash. Our records show only "steering wheel was stiff & unable to control vehicle & had accident." However, we do know that the vehicle is a 2004 MY built in May of 2004, and that the incident was reported in March of 2005 with approximately 10,000 miles on the odometer. This means that this vehicle was still under the regular warranty coverage at the time of the incident. A review of our warranty database shows some repair work completed on this vehicle for hard steering and noise while turning, but these repairs were made to a leaking power steering reservoir hose, not the intermediate shaft. As such, we believe that none of these reports alleging a crash had occurred are related to the corrosion of the lowermost universal joint of the steering intermediate shaft.

Conclusion

In summary, while Toyota has identified an issue with the steering intermediate shaft that could result in slightly increased steering effort, at this time Toyota has not determined the existence of a safety-related defect. This is because Toyota believes the issue occurs gradually, and is noticeable to the operator well before the steering effort increases to a point where the operator cannot turn the steering wheel. This is evidenced in the reports submitted in this response.

Furthermore, while responsive to your inquiry's four definitions of alleged defect, Toyota does not believe that any of the crash reports submitted were related to the corrosion of the universal joint. Regarding the five VOQ's submitted with your inquiry, two of them were duplicated with reports made to Toyota. Of the 5 VOQ's, there are no crashes or injuries reported within. Finally, when considering the extremely low rate of occurrence and absent of an unreasonable risk to motor vehicle safety, the need for a campaign, let alone one under the safety act, is not warranted. Furthermore dealers are already aware of the issue via our

service bulletin, and the condition can be repaired properly when the vehicle is brought in for service.

For these reasons, Toyota has not at this time determined that a safety related defect exists in the Toyota Sienna steering system. We believe the agency will come to the same conclusion in this Preliminary Evaluation and your ongoing Engineering Analysis into the Kia Sedona vehicles for an almost identical issue. In order to assist you investigations, Toyota is currently preparing a test vehicle for your office to evaluate in a technical demonstration. We look forward to discussing this issue with your office in the near future.

* * *

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:

Data		
Response 1	Production Data	08/19/08
Response 2 - 4	Consumer Complaint	07/16/08
	Field Report	08/26/08
	Lawsuit	08/06/08
Response 5	Warranty claims	08/04/08
	Goodwill	07/29/08
	Extended warranty claims	07/26/08
Response 7	Dealer communications	07/16/08
Response 8	Actions	09/24/08
Response 9	Changes & Modifications	09/19/08
Response 11	Part sales	09/02/08