DP09-001 ATTACHMENT 1

INFORMATION Redacted PURSUANT TO THE FREEDOM OF INFORMATION ACT (FOIA), 5 U.S.C. 552(B)(6)

DP09-001 09V-388 consumer letter

Kathy Wachs / Lexus Customer Services Service and Parts Operations December 1, 2009 Approved By: Al Smith

To: All Lexus Dealers From: Lexus Customer Services

> Safety Campaign (Special Service Campaign) - 9LG Dealer Notification on Potential Floor Mat Interference with Accelerator Pedal (Updated December 1, 2009)

In early October, Lexus announced it will initiate a Safety Campaign (Special Service Campaign) for potential floor mat interference with the accelerator pedal. The condition involves the potential for an unsecured or incompatible driver's floor mat to interfere with the accelerator pedal and cause it to get stuck in the wide open position. A stuck open accelerator pedal may result in very high vehicle speeds and make it difficult to stop the vehicle, which could cause a crash, serious injury or death. Lexus issued a consumer safety advisory on September 29 on this issue and has, as an interim measure, commenced mailing safety notices to certain Lexus owners on October 30. *Today, Lexus has announced the details of the vehicle-based remedy to address this issue*.

Remedy:

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• The specific measures of the vehicle-based remedy are as follows:

- The shape of the accelerator pedal will be reconfigured to address the risk of floor mat entrapment, even when an older-design all-weather floor mat or other inappropriate floor mat is improperly attached, or is placed on top of another floor mat. For the ES 350 the shape of the floor surface underneath will also be reconfigured to increase the space between the accelerator pedal and the floor.
 Vehicles with any genuine Lexus accessory all-weather floor mat will be provided with newly-designed replacement driver-side and front passenger-side all-weather floor mats.
- Lexus is in the process of completing development of these actions and will begin notifying ES 350 owners via first-class mail. Technical
 and reimbursement instructions will be distributed shortly before the notification begins, also at this time specific VINs will be loaded into
 TIS for inquiry purposes. The remaining models will launch on a rolling schedule during 2010.

Extra Measure of Confidence:

In addition to the vehicle-based remedy, Lexus intends to add a supplemental function to the software for the ES 350, IS 350, and IS 250 models. These models will have a brake override system installed, which will cut engine power in the case of simultaneous application of both the accelerator and brake pedals.

Involved Vehicles:

Lexus 2007 - 2010 ES 2006 - 2010 IS

Notification Schedule

- Lexus will begin sending dealer notifications in mid-December, 2009.
- Owner letters will be mailed approximately one week after dealer notification.

Customer and Media Contacts

- A Q&A has been attached for your use in the event you receive a customer contact. If a customer has
 further questions, please direct the inquiry to the Lexus Customer Assistance Center at 1-800-255-3987.
- If you are a dealership associate and have any questions, please contact your District Service and Parts Manager.
- In the event you are contacted by the News media, it is imperative that all media contacts (local and national) receive a consistent message. Please direct all media contacts to Brian Lyons (310) 468-2552 or John Hanson (310) 468-4718, in Corporate Communications. (Please do not provide these numbers to customers or call if you are a dealer associate.)

Thank you for your cooperation.



Special Service Campaign Potential Floor Mat Interference with Accelerator Pedal

<u>Q1:</u> Which vehicles are involved?

Toyota 2005 - 2010 Avalon 2007 - 2010 Camry 2004 - 2009 Prius 2005 - 2010 Tacoma 2007 - 2010 Tundra

Lexus 2007 - 2010 ES 2006 - 2010 IS

Q2: What is the condition?

A2: There is a risk for floor mat entrapment of accelerator pedals in certain Toyota and Lexus models when an unsecured or incompatible driver's floor mat is used

Q3: When will the campaign remedy be launched?

A3: Lexus will notify dealers of this remedy campaign in mid-December 2009. Toyota intends to begin owner notification in late December, on a rolling schedule, beginning with ES, Camry and Avalon.

The IS, Prius, Tacoma and Tundra will follow, beginning around the end of March 2010.

In the interim, Toyota recommends that owners remove *any* driver-side floor mat from the specific models identified and NOT replace it with any other floor mat. Toyota will contact owners when the campaign remedy for there specific vehicle is available.

Q4: How will Toyota remedy the vehicles? What is the campaign remedy?

A4: Toyota's remedy plan is to modify or replace the accelerator pedals on the subject vehicles to address the risk of floor mat entrapment. In the Lexus ES, Camry and Avalon models, additional modifications to the floor surface are included to help improve the pedal clearance. In addition, Toyota will replace any Toyota or Lexus all-weather floor mat in a subject vehicle with a newly designed mat. For those customers who have the previous design all-weather floor mat but do not want the newly designed all-weather floor mat, Toyota will recover the previous design all-weather floor mat and reimburse its price.

In addition to the campaign remedy, Toyota will add a supplemental function to the software for owners of ES, Camry, Avalon and IS models that will ensure that the brake overrides the accelerator in the event that both pedals are being applied at the same time. This software supplement will reduce the consequences of pedal entrapment, should it occur.

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<u>Q5:</u> What should customers do?

A5: Until customers receive notification from Toyota for their specific vehicle remedy, we request that customers take out any *removable* driver's floor mat and NOT replace it with any other floor mat.

Q5a: What if a customer chooses not to remove their floor mat?

A5a: In the event a customer chooses not to remove their floor mat, Toyota strongly recommends that they ensure that the correct floor mat is being used, that it is properly installed and secured, that it is not flipped over with bottom-side up, and that one floor mat is not stacked over another. Information on proper floor mat installation can be found on http://www.toyota.com and http://www.lexus.com.

Q5b: What if a customer requires assistance in checking the floor mat?

A5b: If a customer chooses not to remove their floor mat and requires assistance, they may check with any local Lexus or Toyota dealership's Parts or Service Department to verify the application. Dealers will re-install only those floor mats designed specifically for that model and model year.

Q5c: What if a customer needs retaining hooks (clips)?

A5c: Replacement retaining hooks (clips) for Lexus and Toyota carpeted and all-weather floor mats are available at any Lexus or Toyota dealership. Please check with the dealer for details.

O6: What if a customer would like to verify the installation and applicability of the floor mats currently installed in their vehicle?

A6: Please direct the customer to their local Lexus dealership's Parts or Service Department to verify whether the Lexus floor mat is designed specifically for their vehicle and correctly installed. The floor mat should be removed before driving to the dealership.

Q7: What if a floor mat is an aftermarket rubberized floor mat?

A7: Driver's floor mat interference is possible in any make or model vehicle with any combination of floor mats. Therefore, consumers need to make sure the floor mats are compatible for their model and model year. Also, they need to be sure they are properly secured using the appropriate retention device (clips). Driver's floor mats should never be stacked. Consumers should never place any floor mat – aftermarket or not -- on top of another driver's floor mat. Floor mats should also not be flipped over with the bottom-side up.

Q8: What if a driver experiences accelerator pedal interference. What should they do?

A8: Should the vehicle continue to accelerate rapidly after releasing the accelerator pedal, this could be an indication of floor mat interference. If this occurs, Toyota recommends the driver take the following actions:

First, if it is possible and safe to do so, pull-back the floor mat and dislodge it from the accelerator pedal; then pull over and stop the vehicle.

If the floor mat cannot be dislodged, then firmly and steadily step on the brake pedal with both feet. Do not pump the brake pedal repeatedly as this will increase the effort required to slow the vehicle.

Shift the transmission gear selector to the Neutral (N) position and use the brakes to make a controlled stop at the side of the road and turn off the engine.

If unable to put the vehicle in Neutral, turn the engine OFF. This will not cause loss of steering or braking control, but the power assist to these systems will be lost.

-If the vehicle is equipped with an Engine Start/Stop button, firmly and steadily push the button for at least three seconds to turn off the engine. Do NOT tap the Engine Start/Stop button.

-If the vehicle is equipped with a conventional key-ignition, turn the ignition key to the ACC position to turn off the engine. Do NOT remove the key from the ignition as this will lock the steering wheel.

Q9: What if an owner has additional questions or concerns?

A9: Owners with questions or concerns, are asked to please contact the Toyota Customer Experience Center (1800331-4331) or Lexus Customer Assistance Center (1800255-3987), or consult the information posted at http://www.toyota.com/floormats and http://www.lexus.com/floormats

DP09-001 09V-388 Toyota Recall

09V-388 (4 Pages)

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TOYOTA MOTOR NORTH AMERICA, INC. WASHINGTON OFFICE 601 Thirteenth Street, NW #910 South Washington, DC 20005

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

October 5, 2009

Mr. Daniel C. Smith Associate Administrator for Enforcement National Highway Traffic Safety Administration 1200 New Jersey Avenue, S.E. Washington, D.C. 20590

> RE: Certain Toyota and Lexus Vehicles Potential Floor Mat Interference with Accelerator Pedal

Dear Mr. Smith:

On September 29, 2009 Toyota issued a consumer safety advisory to address the risk of floor mat entrapment of accelerator pedals in certain Toyota and Lexus models. Toyota urged owners of potentially affected vehicles to take out removable drivers' side floor mats in their vehicles, pending the development of model-specific remedies. Toyota undertook this action in response to reports of vehicles accelerating rapidly after release of the accelerator pedal, due to entrapment of the pedal by unsecured or improper floor mats.

The purpose of this letter is to transmit the information specified by Part 573 of your regulations with respect to the forthcoming safety campaign, which will provide a vehicle-based remedy for affected vehicles to reduce the risk of future incidents.

Although Toyota is willing to identify this campaign as a safety recall in the owner communication about the campaign, Toyota has not determined that the vehicles identified in item 2, below, contain a "safety-related defect" within the meaning of the federal vehicle safety laws. Nevertheless, Toyota will voluntarily notify its customers of this campaign and will voluntarily cooperate with NHTSA's recall procedures by providing six quarterly reports of campaign completion.

Toyota understands that NHTSA will assign a recall number to this campaign, as if it were a campaign conducted under the Safety Act, and will post the information about the campaign on the NHTSA/ODI website. Toyota also requests that the summary of the campaign on the NHTSA/ODI website contain a notation that Toyota has not made a decision that these vehicles contain a safety-related defect.

Associate Administrator for Enforcement October 5, 2009 Page 2

A draft owner notification letter will be provided under separate cover. Please see the following information, as specified in Part 573 of your regulations:

1. Manufacturer's name/address:

Toyota Motor Corporation ["TMC"] 1, Toyota-cho, Toyota-city, Aichi-ken, 471-8571, Japan

Affiliated U.S. Sales Company

Toyota Motor Sales, USA, Inc. ["TMS"] 19001 South Western Avenue Torrance, CA 90509

2. Vehicles involved in this notification:

Based on production records, we have determined the affected vehicle population to be the population described in the table below:

Make/ Model M		Manufac-		VIN	Production	
Car Line	Year	turer	VDS	VIS	Period	
Camry	2007- 2010	TBD	TBD	TBD	TBD	
Avalon	2005- 2010	TBD	TBD	TBD	TBD	
Prius	2004- 2009	TBD	TBD	TBD	TBD	
Tacoma	2005- 2010	TBD	TBD	TBD	TBD	
Tundra	2007- 2010	TBD	TBD	TBD	TBD	
Lexus ES 350	2007- 2010	TBD	TBD	TBD	TBD	
Lexus IS 250/350	2006- 2010	TBD	TBD	TBD	TBD	

Please note this list of vehicles is preliminary and may change as Toyota's internal investigation continues. We will advise you promptly of any changes to this list.

3. Total number of vehicles:

As noted in item 2, above, Toyota is still in the process of determining the scope of the affected vehicle population. We currently estimate that there are 3.8 million vehicles identified in item 2, above; however, this estimate is subject to change as Toyota refines the number of affected vehicles by model.

4. Approximate percentage of vehicles estimated to actually contain the condition:

Unknown

5. Description of the condition:

Toyota has determined that there is a potential for an accelerator pedal to get stuck in the wide open position due to an unsecured or incompatible driver's floor mat. A stuck open accelerator pedal may result in very high vehicle speeds and make it difficult to stop the vehicle, which could cause a crash, serious injury or death.

6. Chronological summary of events leading to this campaign:

In 2007, Toyota undertook a voluntary safety campaign of all-weather floor mats designed for certain Lexus ES350 and Toyota Camry models to address the risk of potential floor mat interference with the accelerator pedal.

Recent events have prompted Toyota to take a closer look at the potential for accelerator pedal entrapment by unsecured or incompatible floor mats in these models, as well as other Toyota and Lexus models on which complaints of entrapment have been received. On September 29, Toyota determined to conduct a safety campaign to address this condition.

7. Description of Campaign (including schedule for dealer and customer notification):

Toyota will notify owners of affected vehicles to take out any removable driver's floor mat and not replace it with any other floor mat, pending the development of model-specific remedies. Toyota expects to carry out this customer notification via first class mail, and expects to begin the mailing in late October (by model)

and expects to complete the mailing in December. A draft copy of the owner letter will be provided under separate cover.

After Toyota completes its countermeasure development actions, it will provide a second notification to owners of affected vehicles about the availability of a free remedy. Toyota will provide you with an advance draft of the notification for your review when it is available. Toyota does not currently have a firm schedule for the second notification; however, Toyota will provide such a schedule as soon as possible. Please note that different models may be ready for the second notification at different times. Toyota will keep your staff informed as this schedule evolves.

Toyota has notified its dealers about the safety advisory. A copy of the dealer communication will be provided under separate cover. When the second notification for customers is ready to begin, Toyota will notify its dealers and provide appropriate documentation for the action to them. This schedule will be developed in parallel with the schedule for second notification of customers.

Toyota believes that the reimbursement provisions of Part 573 are not applicable to this campaign, because no vehicle owner will have obtained the as-yet undeveloped countermeasure(s) at his/her own expense.

Toyota appreciates this opportunity to cooperate with NHTSA. Should you have any questions about this information, please let me know at (202) 775-1707.

Sincerely,

TOYOTA MOTOR NORTH AMERICA, INC.

Chris Santucci Assistant Manager Technical & Regulatory Affairs

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DP09-001 2008 Lexus ES350 ext_1



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NHTSA #: ES09-001570 XREF #: Delivery: CRT Rec'd Date: 3/19/2009 Doc Type: PET Address To: Referred By: NPO-011 Doc Date: 3/13/2009 Due Date: 4/8/2009

S10 #: DOT/I #: RMP #: Subject: PETITION FOR ADDITIONAL INVESTIGATION INTO THE UNWANTED AND UNINTENDED ACCELERATION OF MODEL YEAR 2007 LEXUS ES350

Ack Date: Sign Office: ENFORCEMENT Cleared Date: File Loc: Added By: SHARRIS x62534 Ack By: Signature: SMITH Cleared By: XREF File: Modified By: SANDRA.HARRIS

Signed For: Cleared For: Closed Date:

Most Recent Comment:

Author:

PLYMOUTH, MN Tel	Fax: E-mail:			
Assigned To	Task	Asgn Date	Deadline	Returned Date
NVS-200	REPLY	3/19/2009	4/8/2009	
NVS-010	INFORMATION	3/19/2009		3/19/2009

2009 HAN 20 BH 1: 03

March 13, 2009

Administrator National Highway Traffic Safety Administration 400 Seventh Street, S.W. Washington, D.C. 20590

RE: Petition of an Interested Party under Part 552 of 49 CFR Chapter V

Dear Sir/Madam:

Purpose

The purpose of petitioner's letter is to request an additional investigation into the unwanted and unintended acceleration of model year 2007 Lexus ES350 as the initial investigation (PE07-016) was too narrow in scope and did not adequately address all complaints made to the NHTSA with respect to vehicle speed control concerns. Related and contributory issues requiring further attention are noted below.

The petitioner also requests an additional investigation of model years 2002-2003 Lexus ES300 for those "longer duration incidents involving uncontrollable acceleration where brake pedal application allegedly had no effect" for which Ms. Kathleen C. Demeter, Mr. Jeffrey L. Quandt and Mr. D. Scott Yon determined was not within the scope of an earlier investigation (PE04-021) closed on July 22, 2004.

This additional investigation of model years 2002-2003 Lexus ES300 is relevant to the petition for the model year 2007 Lexus ES350 noted above. Reviewing all pertinent data across model years will better indicate the existence of any pattern.

1. Proper Party to Preliminary Evaluation PE07-016

On March 29, 2007 PE07-016 was opened by Ms. Kathleen C. Demeter, Mr. Jeffrey L. Quandt and Mr. D. Scott Yon with respect to the following Problem Description - accessory floor mat interference with the throttle pedal on 2007 Lexus ES350 vehicles. The ODI Resume prepared as of that date provided no explanation as to how the Problem Description was determined but did indicate there were five (5) complaints involving three (3) injury incidents and seven (7) injuries.

On or about April 7, 2007, Mr. Quandt sent Mr. Christopher J. Tinto, Vice President Technical and Regulatory Affairs for Toyota Motor North America, Inc. (Toyota NA) a letter informing him "...that the Office of Defects Investigation (ODI) of the National Highway Traffic Safety Administration (NHTSA) has opened a Preliminary Evaluation (PE07-016) to investigate incidents of vehicle runaway due to interference between the Lexus accessory floor mat (all-weather floor mat) and the accelerator pedal in model year (MY) 2007 Lexus ES350 vehicles manufactured by Toyota Motor North America, Inc. and to request certain information."

The Vehicle Certification Label within the driver's side door jam identifies the MY 2007 Lexus ES350 as being manufactured by Toyota Motor Corporation (TMC) at one of its locations within Japan.

Toyota Motor Sales, U.S.A., Inc. (Toyota USA) is a wholly-owned subsidiary of TMC, responsible for US sales and the parent company of Lexus, a division of Toyota Motor Sales, U.S.A., Inc. (Lexus Division), the company identified as the warrantor for Lexus warranties on page 16 of the Warranty and Services Guide for MY 2007 Lexus ES350. Toyota Motor North America, Inc. (Toyota NA), also a wholly-owned subsidiary of TMC, is the holding company for Toyota's manufacturing, financing, sales and marketing operations in Canada, Mexico and the US.

On page 2 of this same letter, "Toyota" is also defined as "Toyota Motor North America, Inc. ...including all of its divisions, subsidiaries (whether or not incorporated) and affiliated enterprises ..." It is difficult to determine if this definition includes Toyota USA and Lexus Division; it leaves room for interpretation.

Issue #1

Responses from Toyota to PE07-016 may have been limited in some manner by the failure to properly address the appropriate parties to the investigation, specifically Toyota USA and/or Lexus Division. Defining "Toyota" more broadly to include all US incorporated subsidiaries of TMC regardless of level or tier may be the most prudent approach. This corresponds more closely with the manner in which Mr. Quandt's March 30, 2004 letter to Mr. Christopher Tinto regarding PE04-021defines "Toyota".

2. Toyota's Response – Causes of Alleged Defect

Within his April 7, 2007 letter to Mr. Tinto, Mr. Quandt stated "This office has received ten vehicle owner questionnaires (VOQs) reports of unwanted acceleration in MY 2007 Lexus 2007 ES350 vehicles. Information collected by ODI indicates that at least five of these incidents appear to have been caused by interference between the Lexus all-weather rubber accessory floor mat and the accelerator pedal."

On page 2 of Mr. Quandt's letter, "Alleged defect" is defined as "Allegations of A) excessive engine speed and or power output without the driver pressing on the accelerator pedal or, B) the engine speed and or power output failing to decrease when the accelerator pedal was no longer being depressed or, C) the subject component interfering with the operation of the throttle pedal". On the same page, "Subject component" is defined as "all Toyota optional equipment (accessory) all-weather floor mats manufactured for use on the subject vehicles".

On May 16, 2007 Ms. DeMeter requested a test by the Vehicle Research and Test Center (VRTC) due to "Accessory all weather mat interferes with throttle operation."

Request # 16 in Mr. Quandt's April 7, 2007 letter asks for Toyota's assessment of the alleged defect. In Mr. Tinto's June 11, 2007 response to Mr. Quandt on behalf of Toyota, Response 16 states in part "Toyota has reviewed all applicable data available at the time and believes that some allegations of incident are likely related to the improper installation of the all weather floor mat in the driver's foot well." It is important to note the implied qualification made by Mr. Tinto that <u>not</u> all allegations of incident are related to the all-weather floor mat.

Issue # 2

Mr. Tinto's Response 16 on behalf of Toyota implies that not all allegations of incident (i.e., excessive engine speed and or power output without the driver pressing on the accelerator pedal or the engine speed and or power output failing to decrease when the accelerator pedal was no longer being depressed or all-weather floor mats interfering with the operation of the throttle pedal) were related to the improper installation of the all weather floor mat in the driver's foot well.

Even with this admission, the NHTSA did not further inquire of or investigate the allegations of incident not related to the improper installation of the all-weather floor mat in the driver's foot well.

3. Narrow Scope of Preliminary Evaluation PE07-016

The initial investigation was opened on March 29, 2007 after receiving ten vehicle owner questionnaires (VOQs) reports of unwanted acceleration in MY 2007 Lexus 2007 ES350 vehicles in the NHTSA office.

The April 7, 2007 letter Mr. Quandt sent Mr. Tinto, Vice President Technical and Regulatory Affairs for Toyota Motor North America, Inc. (Toyota NA) sought additional information. Request # 2 specifically requests the number of various items "a" through "f" received by Toyota, or of which Toyota is otherwise aware, which relate to, or may relate to, the alleged defect in the subject vehicles. These items include consumer complaints, field reports, reports based on claims against the manufacturer, notices received by the manufacturer, property damage claims, third party arbitration proceedings and pending and closed lawsuits.

Additional information from Toyota on June 11, 2007 indicates that there were 38 unique vehicles with customer complaints. Toyota further provided, "This includes 4 vehicles which are duplicated with the NHTSA VOQs attached to the inquiry letter."

Within VRTC Memorandum Report EA07-010 (VRTC-DCD-7113), it stated that a survey was sent to a sample size of 1,986 registered owners of a 2007 Lexus ES350 requesting information regarding episodes of unintended acceleration. Of the 600 responses received, 59 owners stated they experienced unintended acceleration. Thirty-five (35) of these reported that their vehicles were equipped with rubber Lexus all-weather floor mats and several commented that the incident occurred when the accelerator had become trapped in a groove in the floor mat.

On August 8, 2007, PE07-016 is officially closed by Ms. Demeter, Mr. Quandt and Mr. Yon. Within the ODI Resume of the same date, the Failure Report Summary has been updated to reflect both ODI and Manufacturer data. The report states that PE07-016 has been upgraded to an Engineering Analysis (EA07-10).

On October 11, 2007, Engineering Analysis (EA07-10) is officially closed by Ms. Demeter, Mr. Quandt and Mr. Yon.

Issue # 3

Upon NHTSA receiving additional information from the manufacturer (i.e., Toyota) on June 11, 2007, additional VOQs reports (as noted in the updated ODI Resume dated August 8, 2007 closing the Preliminary Evaluation investigation) and VRTC owner survey results that identified vehicles without all-weather car mats experiencing unintended acceleration, there was no evidence that the scope of the investigation was broadened or increased for additional causes beyond the all-weather floor mats.

4. Vehicle Certification Label – Compliance with Federal Safety Standard No. 124

Section 30112(a)(1) of Title 49 of the US Code provides "... a person may not manufacture for sale, sell, offer for sale, introduce or deliver for introduction in interstate commerce, or import into the United States, any motor vehicle or motor vehicle equipment manufactured on or after the date an applicable motor vehicle safety standard prescribed under this chapter takes effect unless the vehicle or equipment complies with the standard and is covered by a certification issued under section 30115 of this title."

Section 30115(a) of Title 49 of the US Code provides "A manufacturer or distributor of a motor vehicle or motor vehicle equipment shall certify to the distributor or dealer at delivery that the vehicle or equipment complies with applicable motor vehicle safety standards prescribed under this chapter. A person may not issue the certificate if, in exercising reasonable care, the person has reason to know the certificate is false or misleading in a material respect."

Code of Federal Regulations (CFR) Title 49, Part 571 identifies Federal Motor Vehicle Safety Standards originally established under section 103 of the National Traffic and Motor Vehicle Safety Act of 1966. Standard No. 124; Accelerator control systems should be examined with respect to vehicle speed control involving unwanted acceleration in MY 2007 Lexus ES350.

This standard establishes requirements for the return of a vehicle's throttle to the idle position when the driver removes the actuating force from the accelerator control, or in the event of a severance or disconnection in the accelerator control system. This standard applies to passenger cars and was last amended on March 4, 1995. Toyota has been operating under the knowledge of this Standard for over 10 years before MY Lexus ES350 was launched in April 2006.

S5.1 of Standard No. 124 provides, "There shall be at least two sources of energy capable of returning the throttle to the idle position within the time limit specified by S5.3 from any accelerator position or speed whenever the driver removes the opposing actuating force. In the event of failure of one source of energy by a single severance or disconnection, the throttle shall return to the idle position within the time limits specified by S5.3, from any accelerator position or speed whenever the driver removes the opposing actuating force."

S5.3 of Standard No. 124 provides in part, "Except as provided below, maximum time to return to idle position shall be 1 second for vehicles of 4536 kilograms or less GVWR, and 2 seconds for vehicles of more than 4536 kilograms GVWR." The GVWR for MY

2007 Lexus ES350 is less than 4536 kilograms. The exception is for a vehicle exposed to extreme cold conditions.

As has been stated in various owner/operator VOQs, there has been no opposing actuating force either by the driver or by car mats on the accelerator pedal once braking commenced. The throttles on the vehicle in question however failed to return to the idle position within the required 1 second time limit during these incidences of unwanted acceleration.

In my personal experience of this unwanted acceleration on February 3, 2009, attempts to dislodge the throttle by alternatively pumping the accelerator pedal and pulling up on it from the underside with my right foot followed by braking with two feet did not result in a return of the throttle to the idle position.

S4.1 of this standard defines "Driver-operated accelerator control system"; it "means all vehicle components, except the fuel metering device, that regulate engine speed in direct response to movement of the driver-operated control and that return the throttle to the idle position upon release of that actuating force."

Many vehicles uses a Throttle Position sensor to provide input to traction control, fuel injection and other systems but use a Bowden cable to directly connect the pedal with the throttle. The Electronic Throttle Control System (ETCS) within the MY 2007 Lexus ES350 has no such throttle cable. Instead, a Throttle Position (TP) sensor is mounted on the throttle body and detects the opening angle of the throttle valve. This sensor is a non-contact type. The TP sensor has two sensor circuits which each transmits a signal; they are referred to as VTA1 and VTA2. VTA1 is used to detect the throttle valve angle and VTA2 is used to detect malfunctions in VTA1.

The sensor signal voltages vary between 0 V and 5 V in proportion to the throttle valve opening angle and are transmitted to the VTA terminals of the Engine Control Module (ECM). As the throttle valve closes, the sensor output voltage decreases and as the valve opens, the sensor output voltage increases. A specific voltage difference is expected between the sensor terminals, VTA1and VTA 2, for each throttle valve opening angle. If the difference between VTA1 and VTA2 is incorrect, the ECM interprets this as a malfunction in the sensor and sets a DTC (Diagnostic Trouble Code). VTA1 and VTA2 each have a specific voltage range. If VTA1 or VTA2 is outside the normal operating range, the ECM interprets this as a malfunction in the sensor and sets a DTC.

In addition to the Throttle Position (TP) sensor, an Accelerator Pedal Position (APP) sensor is mounted on the accelerator pedal bracket and has 2 sensor circuits: VPA (main) and VPA2 (sub). This sensor is also a non-contact type. The voltage, which is applied to terminals VPA and VPA2 of the ECM, varies between 0 V and 5 V in proportion to the operating angle of the accelerator pedal (throttle valve). A signal from VPA indicates the actual accelerator pedal opening angle (throttle valve opening angle) and is used for engine control. A signal from VPA2 conveys the status of the VPA circuit and is used to check the APP sensor itself.

The ECM monitors the actual accelerator pedal opening angle (throttle valve opening angle) through the signals from VPA and VPA2, and controls the throttle actuator according to these signals.

These are the sole sensors within the ETCS; there are no sensors on the accelerator pedal to measure either pedal position or applied force. When there has been no evidence of malfunction (e.g., no DTCs appear when the vehicle is connected to Toyota's intelligent tester), Toyota has determined that either car mats are the issue or that all systems are fully functional. Toyota has not publicly found fault with the Electrical Throttle Control System or the Engine Control Manual.

Issue #4

This ETCS within MY 2007 Lexus ES350 does not satisfy the requirements of Standard No. 124; Accelerator control systems, specifically S5.1 and S5.3 as previously discussed.

The existing TP and APP sensors do not measure either any force/pressure to the driver-operated control or any release of the actuating force to the driver-operated control (i.e., accelerator pedal) nor does it regulate engine speed in <u>direct</u> response to movement of the driver-operated control. These sensors were <u>not</u> designed to measure when the driver removes the actuating force from the accelerator control (i.e., release of the accelerator pedal).

The TP and APP sensors were designed to regulate engine speed based on voltage within their circuits; this voltage is converted into measurements. The TP sensor VTA1 expresses the throttle valve opening as a percentage based upon the voltage. The voltage from the APP sensor is also used to measure the throttle valve opening.

Due to non-compliance with Standard No. 124, it follows that the Vehicle Certification label on all MY 2007 Lexus ES350 vehicles does not comply with Section 30112(a)(1) of the US Code. Furthermore in exercising reasonable care, Toyota Motor Corporation (TMC) would have knowledge the certificate is false or misleading in a material respect – a violation of Section 30115(a) of Title 49 of the US Code. TMC had been operating under the knowledge of this Standard No. 124 for over 10 years before MY Lexus ES350 was launched in April 2006.

5. Adequacy of Service Brakes

Code of Federal Regulations (CFR) Title 49, Part 571 identifies Federal Motor Vehicle Safety Standards originally established under section 103 of the National Traffic and Motor Vehicle Safety Act of 1966. Standard No. 135; Light vehicle brake systems should also be examined with respect to vehicle speed control involving unwanted acceleration in MY 2007 Lexus.

The purpose of this standard is to ensure safe braking performance under normal and emergency driving conditions. This standard applies to passenger cars manufactured on or after September 1, 2000.

MY 2007 Lexus ES350 has a Brake power assist unit. According to page 137 of the Owner's Manual, "BA (Break Assist) Generates an increased level of braking force after the brake pedal is depressed, when the system detects a panic stop situation." As defined in S4 of this Standard No. 135, "Brake power assist unit means a device installed in a hydraulic brake system that reduces the amount of muscular force that a driver must apply to actuate the system, and that, if inoperative, does not prevent the

driver from braking the vehicle by a continued application of muscular force on the service brake control."

S4 of this standard also defines "Functional failure". It "... means a failure of a component (either electrical or mechanical in nature) which renders the system totally or partially inoperative yet the structural integrity of the system is maintained."

S5.5 of this standard provides that each vehicle shall have one or more visual brake system warning indicators. Per S5.5 (b) of this standard, "Vehicles manufactured with a split service brake system may use a common brake warning indicator to indicate two or more of the functions described in S5.5.1(a) through S5.5.1(g). If a common indicator is used, it shall display the word 'Brake'." A common indicator is not allowed for a vehicle manufactured without a split service brake system. Since MY 2007 Lexus ES350 uses the "Brake" word common indicator, it apparently has a split service brake system.

S7.11 of this standard provides for various testing requirements when the "Brake power unit" or "brake power assist unit" become inoperative due to a depleted system. The Performance requirements under S7.11.4 provide, "The service brakes on a vehicle equipped with one or more brake power assist units or brake power units, with one such unit inoperative and depleted of all reserve capability, shall stop the vehicle as specified in S7.11.4(a) or S7.11.4(b).

- (a) Stopping distance from 100 km/h test speed: <= 168 m (551 ft).
- (b) Stopping distance for reduced test speed: $S \le 0.10V + 0.0158V^2$

In Mr. Tinto's June 11, 2007 letter to Mr. Quandt of the NHTSA regarding PE07-016 he states, "As with any vehicle in production today, the ES350 service brakes are more than adequate in stopping a vehicle with a stuck throttle pedal. Customers would be aware that something is operating in an unusual manner, can apply the brakes and shut off the vehicle, as instructed in their owner's manual."

Issue # 5

Within the ODI Resume of EA07-010 dated August 9, 2007, the Summary states, "Complainants interviewed by ODI stated that they applied the throttle pedal to accelerate the vehicle then experienced unwanted acceleration after release. Subsequent (and sometimes repeated) applications of the brake pedal reduced acceleration but did not stop the vehicle. In some incidents drivers traveled significant distances (miles) at high vehicle speeds (greater than 90mph) before the vehicle stopped (ODI notes that multiple brake applications with the throttle in an open position can deplete the brake system's power [vacuum] assist reserve resulting in diminished braking)."

This appears to indicate a "Functional Failure" of the brake power assist unit for MY 2007 Lexus ES350 as defined in S4 of Standard 135. However, the vehicle is still required to meet the Performance requirements under S7.11.4 of Standard 135. With the significant distance traveled, it is unlikely this test requirement can be met nor are the Lexus "ES350 service brakes more than adequate in stopping a vehicle with a stuck throttle pedal" as recited by Mr. Tinto.

6. Ignition/Engine Switch

MY 2007 Lexus ES350 utilizes a "push button" ignition/engine switch. This is contrast to the more traditional "key type" ignition/engine switch used for many years in vehicles and still used most frequently in vehicles. With the electronic key on your person, the engine can be started by simply pressing the engine switch, while depressing the brake pedal. (A mechanical key can not be used to start the engine.)

Within the ODI Resume of EA07-010 dated August 9, 2007, the Summary states, "The subject vehicles have an engine control button instead of a traditional ignition key. Some drivers reported that their attempts to turn off the engine by pressing the control button were unsuccessful. In these cases it appears that the drivers were unaware that the button's functionality changes when the vehicle is in motion requiring that it be depressed for 3 seconds (instead of momentarily) to stop the engine."

Within page 95 of the MY 2007 Lexus ES350 Owner's Manual, three separate engine switch modes are identified – (1) OFF mode * (2) ACC mode and (3) IG-ON mode. Modes can be switched by pressing the engine switch when carrying the electronic key on your person. *: The engine cannot be switched to OFF unless the shift level is in P.

On page 9 of the MY 2007 ES 350 Quick Guide, three different features to help protect the vehicle from theft are identified as part of the Theft Deterrent System. One such feature is "Steering Lock". It states, "The steering wheel locks when the engine switch is in OFF mode. To release the steering wheel lock, gently turn the wheel left or right while pressing the engine switch."

Within page 38 of the MY 2007 Lexus ES350 Owner's Manual, the functionality of the "Auto tilt away" feature of the Steering wheel is explained. It provides, "When the engine switch is turned OFF, the steering wheel returns to its stowed position by moving up and away to enable easier driver entry and exit. Switching to ACC or IG-ON mode will return the steering wheel to the original position."

Not only does the steering wheel lock as stated in the 2007 ES 350 Quick Guide, it also moves up and away from the operator. This places the driver in a dangerous situation, one that Lexus recognizes as well. Within page 38 of the MY 2007 Lexus ES350 Owner's Manual, there is a "CAUTION" alert. It provides, "Caution while driving Do not adjust the steering wheel while driving. Doing so may cause the driver to mishandle the vehicle and an accident, resulting in death or serious injury."

Issue #6

Operators of vehicles with the traditional "key type" ignition/engine switch can turn their engines off by shifting their transmission to "Neutral" and turning the key away from the "on" position in the ignition switch.

Contrary to what is reported in the ODI Resume dated August 9, 2007, the MY 2007 Lexus ES350 Owner's Manual clearly indicates "The engine cannot be switched to OFF unless the shift level is in P." Even if the Owner's Manual is not correct and depressing the "push button" engine switch for 3 second will stop the vehicle, doing so will lock the steering wheel and move it up and away from the driver. This action has the same effect as adjusting the steering wheel while driving. Lexus recognizes this places the driver in a dangerous situation and has a "CAUTION" alert stating not to adjust the steering wheel while driving. Drivers of vehicles who are already experiencing unwanted acceleration would magnify the intensity of their current dangerous situation by shutting off their engine in this manner.

The inability to turn off the engine in a safe manner is a significant safety issue with this "push button" ignition issue.

7. ECM and ECUs – Lack of Inputs and Receipt of Contradictory Inputs

The Electronic Throttle Control System (ETCS) is composed of the throttle actuator, Throttle Position (TP) sensor, Accelerator Pedal Position (APP) sensor, and ECM.

The throttle actuator is operated by the ECM and opens and closes the throttle valve using the gears. The opening angle of the throttle valve is detected by the Throttle Position (TP) sensor, which is mounted on the throttle body. The TP sensor provides feedback to the ECM. This feedback allows the ECM to appropriately control the throttle actuator and monitor the throttle opening angle as the ECM responds to driver inputs.

Vehicle Speed Sensor "A" detects the wheel speed and sends the appropriate signals to the skid control ECU. The skid control ECU converts these wheel speed signals into a 4-pulse signal and outputs it to the ECM via the combination meter. The ECM determines the vehicle speed based on the frequency of these pulse signals. This speed sensor is a key component within the Engine Control System, Cruise Control System and Transmission Control System.

The stop light switch is a duplex system that transmits two signals: STP and ST1-. These two signals are used by the ECM to monitor whether or not the brake system is working properly. If the signals, which indicate the brake pedal is being depressed and released, are detected simultaneously, the ECM interprets this as a malfunction in the stop light switch and sets the DTC. The purpose of the stop light switch is to reduce fuel cutoff and RPM resumption when the brake pedal is depressed to improve driveability characteristics of the vehicle. Unfortunately, there is no sensor that measures the amount of force or pressure on the brake pedal. This stop light switch only detects that the brake pedal is being depressed, it does not measure the time duration of brake depression or amount of sustained force on the brake pedal.

Toyota has stated in an internet publication, "During closed throttle deceleration periods from moderate to high engine speeds, fuel delivery is not necessary or desirable. To prevent excessive decel emissions and improve fuel economy, the ECM will not open the injectors under certain decel conditions. The ECM will resume fuel injection at a calculated RPM."

Within page 341 of the MY 2007 Lexus ES350 Owner's Manual, it indicates that the Brake system warning light indicates the following; Low brake fluid and/or Malfunction in the brake booster system. The former is a result of a signal from the brake fluid warning switch (Direct Line) and the latter upon receipt of a signal from the Skid Control ECU with the communication line being the CAN(CAN No. 1 Bus).

Issue #7

The ECM and various ECUs within the subject vehicle are receiving/providing inconsistent inputs based on the language within the Summary section of ODI Resume for EA07-010 dated August 9, 2007.

The Summary states, "Complainants interviewed by ODI stated that they applied the throttle pedal to accelerate the vehicle then experienced unwanted acceleration after release. Subsequent (and sometimes repeated) applications of the brake pedal reduced acceleration but did not stop the vehicle. In some incidents drivers traveled significant distances (miles) at high vehicle speeds (greater than 90mph) before the vehicle stopped (ODI notes that multiple brake applications with the throttle in an open position can deplete the brake system's power [vacuum] assist reserve resulting in diminished braking)."

Contradictory sensor data (e.g., open throttle and sustained extreme brake pressure) should error on the side of caution and safety. When this data is not available to the sensors, this safety deficiency becomes insuperable. Failures in the control systems, whether through operation or design, can result in an unstoppable run-away vehicle. Why should a vehicle's control systems allow it to continue down a highway at a high rate of speed at the same time that the brake's system power assist is being depleted ?

Current VOQ Status

There are now at least 45 VOQs on record with respect to vehicle speed control involving unwanted acceleration in MY 2007 Lexus ES350. I experienced my own incident on February 3, 2009 and sent the first of two letters to Lexus Customer Satisfaction on February 7. After waiting for three weeks for the Lexus Division of Toyota Motor Sales, USA, Inc., to reply with their findings of a field service technician's February 18th inspection of my vehicle, I have now filed my own VOQ as of March 12th.

The original investigation was quite narrow in scope focusing on vehicle runaway due to interference between the Lexus accessory floor mat (all-weather floor mat) and the accelerator pedal in model year (MY) 2007 Lexus ES350 vehicles manufactured by Toyota Motor North America, Inc. With significant evidence suggesting this was but one possible cause, it is appropriate to open a new investigation, one that is much broader in scope and addresses other possible contributory factors.

Review of the VOQs already on record indicate that <u>not</u> all these incidents are related to an accessory all weather floor mat entrapping the throttle pedal. See ODI File numbers 10192384, 10199857, 10203221, 10218118, 10218961, 10219328, 10223792, 10226564, 10230560, 10230929, etc. for such examples. By their own admission, Toyota believes that some but <u>not</u> all allegations of incident are likely related to the improper installation of the all weather floor mat in the driver's foot well.

I personally experienced uncontrollable acceleration that placed me in an extremely dangerous situation. This occurrence was not the result of any floor mat interference as I was able to place my foot under the accelerator pedal and pull up; this action on my part did nothing to stop this unwanted acceleration. If a car floor mat had been causing interference with the accelerator pedal this action on my part would have eliminated both

the interference and the uncontrollable acceleration. (See VOQ ODI File number 10261660 attached.)

A review of other VOQs on record will show that other parties specifically stated that floor mats were not a factor in their cases either. There are at least five other VOQs where floor mats were not involved in the unwanted acceleration. See ODI File numbers 10199857, 10203221, 10226564, 10230560 and 10230929.

If you have any questions or need additional information, contact information is noted below.

Thank you for your consideration of this petition.

Sincerely

Plymouth, MN Phone	

Enclosure

cc: Representative James L. Oberstar, Chairman Transportation and Infrastructure Committee Senator Amy Klobuchar, Minnesota

VOQ - File a Complai	nt		Page 1 of **** NHTSA www.nhtsa.go				
Safety Ratings	Defects & Recalls	Safe Driving Information	Resources				
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Sitemap	Acknowledgement An e-mail was sent to						
EWR Information Sitemap Contact ODI (888) 327-4236 TTY: (800) 424-9153	Consumer Information Name: Daytime Phone: Evening Phone: E-mail: Fax: Address: City, State, Zip: Country: Referral Source:	Plymouth, MN USA Internet Search Engine	ton				
	Complaint Information Description:	Driving home from work, I experienced a sudden ur acceleration causing my speed to increase from ab- Immediately I began to brake hard as I was rapidly ahead of me. Fortunately the inside left lane was ur to make an immediate lane change. Initially I depre- hard as I could using both feet but only managed to MPH. With my speed reduced, I alternated betweer pedal and pulling up on it from the underside with m clear that the throttle was stuck in an open position. speed back up to over 65 MPH with less pressure of traffic just ahead of me, I moved over to the left sho barrier and continued to try to release the open throf smoke around the vehicle and the smell of burning overheating brakes. After finally getting the vehicle 30 MPH, I shifted into "Neutral" and depressed the number of times hoping to stop the engine but noth	acontrollable surge in out 60 MPH to 80+ MPH. approaching traffic just noccupied and I was able ssed the brake pedal as slow the vehicle to 40-45 a pumping the accelerator by right foot as it became The vehicle continued to on the brake pedal. With ulder next to the center tttle. There were clouds of materials from the slowed down to about 25- start/stop push button a ing happened. Instead the				

	acceleration surge stop about 1 ½ to 2 miles fro and depressed the star seemed to "shutter" as Lexus of Wayzata a sho the acceleration repeat	ped and I was able to brin om where it had started. I o t/stop push button to turn o I did so. Upon restarting th ort distance away fully pre ed. The car remains there	g the vehicle to a stop – quickly shifted into "Park" off the engine. The vehic ne car, I drove cautiously pared to shift into "Neutra over 5 weeks later.	le to al"
Approximate Incident Date:	2/3/2009	2/3/2009 Fire :		
Num. Deaths:	0Property Damage:0Crash:		No No	
Num. Injured:				
		Police Report:	No	
VIN: Year, Make, Model:	JTHBJ46G072			
Year, Make, Model:	2007, LEXUS, ES350			
Failure Mileage:	18390			
Speed:	60 			
venicle Component inform	nation			
Component 1:	VEHICLE SPEED CON	ITROL		
		R		
Component 2:	UNKNOWN OR OTHER			
Component 2:		n an	کر این سرو سور و بوده کرد. این میرد این این این میرد این میرد این	- t





DP09-001 Comparison to other Pedal and Mat configurations

From: Magno, Gregory (NHTSA) Sent: Thursday, September 17, 2009 12:29 PM To: McHenry, Stephen (NHTSA); Yon, Scott (NHTSA) Subject: Emailing: Photo 004.jpg, Photo 001.jpg, Photo 002.jpg, Photo 003.jpg

Attachments: Photo 004.jpg; Photo 001.jpg; Photo 002.jpg; Photo 003.jpg

Steve & Scott-

In case you wanted some reference photos. . .

These are photos from a test drive of VW DSG transmission vehicle that we did twoo weeks ago. We happened to notice some floormat / accelerator pedal issues. These were privately owned vehicles turned in to the dealer for diagnostics. Theyt were made available to us for testing.

Given the bottom hinge design AND "smart pedal" software, these vehicles are very resistant to pedal entrapment issues.

The message is ready to be sent with the following file or link attachments:

Photo 004.jpg Photo 001.jpg Photo 002.jpg Photo 003.jpg

Note: To protect against computer viruses, e-mail programs may prevent sending or receiving certain types of file attachments. Check your e-mail security settings to determine how attachments are handled.












DP09-001 Detroit News Toyota Recall Insight

The Detroit News

October 6, 2009

http://detnews.com/article/20091006/AUT001/910060325

Toyota seeks 'vehicle fix' in recall of 3.8M vehicles

DAVID SHEPARDSON Detroit News Washington Bureau

Washington -- Toyota Motor Corp. agreed Monday to recall 3.8 million vehicles -- just days after the U.S. government issued an "urgent" warning to remove driver floor mats because of the danger they could jam and cause the gas pedal to stick open.

The Japanese automaker officially launched its largest recall in the United States, saying in a letter to the National Highway Traffic Safety Administration that it was "willing to identify this campaign as a safety recall."

But Toyota said it "has not determined that the vehicles ... contain a safety-related defect."

The position was unusual, given the public apology on Friday in Tokyo by Toyota's president Akio Toyoda in the wake of a four-fatality California crash in August that may have been caused by a jammed floor mat and uncontrolled acceleration.

"Four precious lives have been lost. I offer my deepest condolences," Toyoda said, according to press reports. "Customers bought our cars because they thought they were the safest. But now we have given them cause for grave concern. I can't begin to express my remorse."

Toyota is working on a remedy that the company describes as a "vehicle fix" -- more than simply removing and replacing the floor mats, Toyota spokesman Brian Lyons said.

A fix could involve replacing the accelerator pedal or taking some other action to eliminate the risk of a floor mat getting jammed under the pedal. Toyota isn't sure when it will have a fix ready.

"It will not just be the floor mat," Lyons said, declining to specify what the fix might be. He said engineering teams in Japan and North America are working on it.

The floor mat issue has dogged Toyota for several years.

In September 2007, Toyota recalled an accessory all-weather floor mat sold for use in about 50,000 2007 and 2008 model year Lexus ES 350 and Toyota Camry vehicles because of similar problems.

The issue drew attention after NHTSA sent investigators to review the wreckage of an Aug. 28 crash that killed four, including an off-duty California Highway Patrol officer who was at the wheel of the 2009 Lexus when it plunged over an embankment and burst into flames.

Mark Saylor and his wife Cleofe, both 45; their 13-year-old daughter, Mahala; and 38-year-old brother-inlaw, Chris Lastrella, were killed after reporting to a 911 operator that they could not stop their Lexus ES 350, as it careened down Route 125 in Santee, Calif.

The tape of the brief call was made public this month. Lastrella told the operator that the vehicle had no brakes. The call ended with occupants urging each other to pray.

NHTSA says that under certain conditions, the mats from 2004-09 model year vehicles could cause the http://detnews.com/article/20091006/AUTO01/910060325&template=printart

www.detnews.com | Printer-friendly article page

accelerator to stick in the full open position, which may result in high speeds and serious crashes.

The agency said the incidents appear to be related to factors including unsecured mats, accelerator pedal configuration, and the shutoff procedure in some vehicles with keyless ignition.

If Toyota hadn't agreed to the recall, NHTSA was planning to open an investigation into the vehicles. NHTSA received 100 complaints, with 17 crashes and five deaths, including the California accident.

Toyota said in its letter to NHTSA that its internal investigation was continuing.

The automaker will "cooperate with NHTSA's recall procedures by providing six quarterly reporters of campaign completion" and will send initial letters to customers later this month.

The list of vehicles being recalled "is preliminary and may change as Toyota's internal investigation continues," said the letter from Chris Santucci, assistant management for regulatory affairs.

On Sept. 14, Toyota urged all dealers to "immediately inspect their new, used, and loaner fleet vehicles to assure that any floor mat, whether factory or aftermarket, is correct for the vehicle and properly installed and secured."

dshepardson@detnews.com">dshepardson@detnews.com (202) 662-8735

Additional Facts

Toyota recall

Here are the recalled vehicles:

- 2007-10 Camry
- 2005-10 Avalon
- 2004-09 Prius
- 2005-10 Tacoma
- 2007-10 Tundra
- 2007-10 Lexus ES 350
- 2006-10 Lexus IS 250 and IS 350

For information, consumers can contact NHTSA's hotline at (888) 327-4236, the Toyota Experience Center at (800) 331-4331 or the Lexus Customer Assistance Center at (800) 255-3987. Information from Toyota is also posted at <u>www.toyota.com</u> and <u>www.lexus.com</u>. *Source: Toyota Motor Corp.*

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DP09-001 Documents, Other



<u>Home</u> > <u>Transport Canada</u> > <u>Road Transportation</u> > <u>Road and Motor Vehicle Safety</u> > <u>Road & Motor Vehicle Safety Publications</u> > Vehicle Floor Mats - Interference with Accelerator (Gas) and Brake Pedals

Vehicle Floor Mats - Interference with Accelerator (Gas) and Brake Pedals

Road Safety and Motor Vehicle Regulation Directorate

Information: 1-800-333-0371

Vehicle Floor Mats Interference with Accelerator (Gas) and Brake Pedals

During Transport Canada's investigations of alleged sudden vehicle accelerations and stuck throttles, we frequently discover that the problem relates to some interference between the vehicle floor mats and the pedals. Typically, the interference occurs when non-original equipment floor mats are used without properly being retained to the vehicle floor. The floor mat can then move under the driver's feet and become lodged either between the pedals, on top of the pedals or under the pedals. Another common problem occurs when consumers install multiple floor mats on top of each other, reducing the clearance between the vehicle floor and the pedals.

If you have installed aftermarket floor mats in your vehicle, make certain they cannot move while driving. If you are going to install rubber mats in the winter months, when doing so, be sure that you remove the originally equipped factory floor mats. Use only one set of mats and make certain that the mats do not interfere with the gas or brake pedal before driving the vehicle.



After installing floor mats, make certain they cannot move and that they do not interfere with the gas or brake pedals. Use only one set of mats.



If the vehicle is equipped with a floor mat retaining pin or clip, make certain that the mat is installed as per the vehicle manufacturer's instructions.

Date Modified: 2009-01-07

TP14665E

V 2007-01 E

March 2007

Vehicle Safety Advisory

Toyota Carpet Floor Mat Quick Reference Chart (Sorted By Model)

Model	Part Number	03	,04	.05	90,	20,	80,	60,	10	Mat Descrip Color	tion Piece Set No.
4 Runner	PT208-89030-04	x	x	x	x	x	x	x		Taupe	4 pc set
4 Runner 4 Runner 4 Runner	PT208-89031-04 PT208-89030-21 PT208-89031-21	X X X	X X X	X X X	X X X	X X X	х	х		Stone Stone	4 pc set
4 Runner Avalon	PT208-89004-20 PT208-07000-08	x	x	x					х	Black Ivory	4 pc set 4 pc set
Avalon Avalon	PT208-07040-10 PT208-07000-08	X X	x x	X X						lvory lvory	4 pc set 4 pc set
Avalon Avalon Avalon	PT208-07000-15 PT208-07040-04 PT208-07000-15	X X X	X X X	X X X						Taupe Taupe	4 pc set 4 pc set 4 pc set
Avalon Avalon	PT208-07000-23 PT208-07040-21	x x	x x	x x						Stone Stone	4 pc set 4 pc set
Avalon Avalon	PT208-07000-23 PT548-07050-10	x	x	x x	x	X	x	x	x	Stone Ivory	4 pc set 4 pc set
Avaion Avaion Avaion	PT548-07050-22 PT548-07050-11 PT548-07050-12			x x x	x x x	x x x	x x x	x x x	x x x	Light Gray Dark Charcoal	4 pc set 4 pc set 4 pc set
Avalon Avalon	PT548-07070-10 PT548-07070-22					x x	x x	x	x x	lvory Graphite	4 pc set 4 pc set
Avalon Avalon	PT548-07070-11 PT548-07070-12 PT206_07000_02					X X	X X	X X	X X	Light Gray Dark Charcoal	4 pc set 4 pc set
Avalon Avalon Avalon	PT206-07090-02 PT206-07090-17 PT206-07090-18							X X	X X	Light Gray Dark Charcoal	4 pc set 4 pc set 4 pc set
Avalon Camry	PT206-07090-16 PT208-32020-01	х	x	х	х			х	х	Graphite Gray	4 pc set 4 pc set
Camry Camry Camry SE	P1208-32020-21 PT208-32020-04 PT208-32041-01	x	x	X X	x					Stone Taupe	4 pc set 4 pc set
Camry - SE Camry / Camry Hybrid	PT208-32041-04 PT206-32060-11		x	x		x	x	x	x	Taupe Ash	4 pc set 4 pc set 4 pc set
Camry / Camry Hybrid Camry / Camry Hybrid	PT206-32060-12 PT206-32060-14					X X	X X	x x	X X	Dark Charcoal Bisque	4 pc set 4 pc set
Camry Hybrid Camry / Camry Hybrid	P1206-32078-40 PT206-32100-45 PT206-32100-12					X			x	Bisque Brown Grav	4 pc set 4 pc set
Celica Corolla - Sport Edition (w/ Rear Heater)	PT206-20030-11 PT206-02030-03	x x	x	х						Charcoal Gray	4 pc set 4 pc set 4 pc set
Corolla (w/ Rear Heater) Corolla (w/ Rear Heater)	PT206-02030-11 PT206-02030-16	X X								Light Gray Oak	4 pc set 4 pc set
Corolla - Sport Edition (w/o Rear Heater) Corolla (w/o Rear Heater) Corolla (w/o Rear Heater)	P1206-02031-03 PT206-02031-11 PT206-02031-16	X X X								Gray Light Gray Oak	4 pc set 4 pc set
Corolla - Sport Edition (w/ Rear Heater) Corolla (w/ Rear Heater)	PT206-02040-03 PT206-02040-11	x x	x x	x x	x x	X X	X X			Gray Light Gray	4 pc set 4 pc set
Corolla (w/ Rear Heater) Corolla - Sport Edition (w/o Rear Heater)	PT206-02040-16 PT206-02041-03	X X	X X	X X	x x	X X	X X			Oak Gray	4 pc set 4 pc set
Corolla (w/o Rear Heater) Corolla (w/o Rear Heater) Corolla (w/ Rear Heater)	P1206-02041-11 PT206-02041-16 PT206-02050-01	X X X	X X X	X X X	X X X	X X X	X X X			Light Gray Oak Gray	4 pc set 4 pc set
Corolla (w/o Rear Heater) Corolla	PT206-02051-01 PT206-02090-12	x	x	x	x	x	x	x		Gray Dark Charcoal	4 pc set 4 pc set
Corolla Corolla	PT206-02091-12 PT206-02090-41							x x		Dark Charcoal Bisque	4 pc set 4 pc set
Corolla Corolla Corolla	P1206-02091-41 PT206-02093-41 PT206-02092-12							x x x	x	Bisque Bisque Dark Charcoal	4 pc set 4 pc set 4 pc set
Corolla Corolla	PT206-02093-12 PT206-02092-41							x	x	Dark Charcoal Bisque	4 pc set 4 pc set
Corolla Corolla	PT206-02093-41 PT206-02102-45							x	x x	Bisque Brown	4 pc set 4 pc set
Echo (2 door w/ rear heater) Echo (2 door w/o rear heater)	PT208-02103-45 PT208-52030-11 PT208-52033-11	x	x	x					X	Dark Gray Dark Gray	4 pc set 4 pc set 4 pc set
Echo (2 door w/ rear heater) Echo (2 door w/o rear heater)	PT208-52030-44 PT208-52033-44	x x	x x	x x						Beige Beige	4 pc set 4 pc set
Echo (4 door w/ rear heater) Echo (4 door w/o rear heater)	PT208-52031-11 PT208-52034-11 PT208-52031-44	x	x	x x						Dark Gray Dark Gray	4 pc set 4 pc set
Echo (4 door w/o rear heater) FJ Cruiser	PT208-52031-44 PT208-52034-44 PT548-60070-11	X	x	X		x	x	x	x	Beige Charcoal	4 pc set 4 pc set 4 PC Set
FJ Cruiser Highlander	PT206-35090-11 PT208-48010-01	x						х		Charcoal Gray	4 pc. set 4 pc set
Highlander Highlander (w/o 3rd row) Highlander (w/ 3rd row)	P1208-48010-10 PT208-48042-31 PT208-48041-31	X	x	x	x					Ivory Ash Ash	4 pc set 4 pc set 5 pc set
Highlander (w/o 3rd row) Highlander (w/o 3rd row)	PT208-48042-10 PT208-48041-10		x	x x	x x					lvory lvory	4 pc set 5 pc set
Highlander - Hybrid (w/ 3rd row) Highlander - Hybrid (w/ 3rd row)	PT208-48061-10 PT208-48061-31 PT548_48060_10			x x	x x	~				lvory Ash	4 pc set 4 pc set
Highlander (w/o 3rd row) Highlander (w/o 3rd row) Highlander (w/ 3rd row)	PT548-48060-10 PT548-48060-31 PT548-48063-10				x x	X X				Ash	4 pc set 4 pc set 5 pc set
Highlander (w/ 3rd row) Highlander - Hybrid (w/ 3rd row)	PT548-48063-31 PT548-48062-10				x x	X X				Ash Ivory	5 pc set 5 pc set
Highlander - Hybrid (w/ 3rd row) Highlander - Hybrid (w/o 3rd row) Highlander - Hybrid (w/o 3rd row)	P1548-48062-31 PT548-48074-10 PT548-48074-31				X X	X X				Ash Ivory Ash	5 pc set 4 pc set
Highlander - Gas Highlander - Gas	PT919-48080-11 PT919-48080-22				~		X X	x x	x x	Black Ash	3 pc set 3 pc set
Highlander - Gas Highlander - Hybrid	PT919-48080-41 PT919-48081-22						X X	x x	x x	Sand Beige Ash	3 pc set 3 pc set
Highlander - Hybrid Highlander - Gas & Hybrid Highlander - Gas & Hybrid	PT919-48081-41 PT919-48082-11 PT919-48082-22						x x x	x x x	x x x	Black Ash	1 pc 1 pc
Highlander - Gas & Hybrid Land Cruiser	PT919-48082-41 PT206-60032-10	x	x	x	x	x	х	х	х	Sand Beige Ivory	1 pc 3 pc set
Land Cruiser Land Cruiser	PT206-60032-11 PT206-60080-01 PT206-60080-10	X	X	X	X	X	x	x	x	Dark Stone Gray	3 pc set 3 pc set
Land Cruiser Matrix - AWD (w/ heater)	PT206-60100-45 PT206-12030-03	x					^	^	x	Brown Gray	3 pc set 4 pc set
Matrix - 2WD (w/ heater) Matrix - 2WD (w/o heater)	PT206-12031-03 PT206-12032-03	X								Gray Gray	4 pc set 4 pc set
Matrix - AWD (W/ Rear Heater) Matrix - 2WD (w/ Rear Heater) Matrix - 2WD (w/o Rear Heater)	PT206-12040-03 PT206-12041-03 PT206-12042-03	X X X	X X X	X X X	X X X	x x	x x			Gray Gray Grav	4 pc set 4 pc set 4 pc set
Matrix (w/o heater) Matrix (w/ heater)	PT206-12070-03 PT206-12071-03					x				Gray Gray	4 pc set 4 pc set
Matrix - 2WD Matrix - AWD	PT206-12090-14 PT206-12091-14 PT206-12002-14							X X	X X	Dark Charcoal Dark Charcoal Dark Charcoal	4 pc set 4 pc set
Matrix - AWD Matrix - AWD MR2 Spyder	PT206-12093-14 PT548-17030-02	x						x	x	Dark Charcoal Black w/ Red Logo	4 pc set 4 pc set 2 pc set
MR2 Spyder MR2 Spyder	PT548-17030-09 PT548-17030-13	x								Black w/ Yellow Logo Black w/ Silver Logo	2 pc set
MR2 Spyder MR2 Spyder MR2 Spyder	PT548-17030-24 PT548-17031-13 PT548-17031-24	X X X	X X	X X						Black w/ I an Logo Black w/ Silver Logo Black w/ Tan Logo	2 pc set 2 pc set 2 pc set
Prius Prius	PT208-47010-03 PT208-47030-02	x								Gray Gray	4 pc set 4 pc set
Prius Prius Prius	PT208-47045-10 PT208-47045-11 PT208-47060-14		X X	X X	X	X	X	X		lvory Dark Gray	4 pc set 4 pc set
Prius Prius Prius	PT926-47100-14 PT926-47100-10 PT926-47100-11				*	×	*	×	x	Misty Gray Dark Gray	4 pc set 4 pc set 4 pc set
Prius Rav 4	PT926-47100-40 PT208-42021-03	x							x	Black Gray	4 pc set 4 pc set
Rav 4 Rav 4 - EV	P1208-42021-15 PT208-42020-11 PT208-42044-15	X X								Taupe Gray	4 pc set 4 pc set
Rav 4 Rav 4 Rav 4	PT208-42044-15 PT208-42041-03 PT208-42041-01	X	x	x						Gray Dark Gray	4 pc set 4 pc set 4 pc set
Rav 4 Rav 4 (w/o 3rd row)	PT208-42041-04 PT208-42051-04		X	X	x	x	x			Taupe Taupe	4 pc set 4 pc set
Rav 4 (w/o 3rd row) Rav 4 (w/o 3rd row) Rav 4 (w/ 3rd row)	PT208-42051-11 PT208-42051-31 PT208-42061-04				X X Y	X X Y	X X Y	x	X X	Ash Taupe	4 pc set 4 pc set
Rav 4 (w/ 3rd row)	PT208-42061-31				x	X	x	х	х	Ash	4 pc set

(Sorted By Model – Continued. . .)

Model	Part Number	£0,	,04	<u> 5</u> 0,	90,	20,	80,	60,	01,	Mat Color	Description Piece Set No.
Rav 4 - Sport (w/o 3rd row) Rav 4 (w/o 3rd row) Rav 4 (w/ 3rd row)	PT208-42091-11 PT208-42081-40 PT208-42083-40							x x x	x x x	Dark Charcoal Sand Beige Sand Beige	4 pc set 4 pc set 4 pc set
Sequoia Sequoia	PT206-0C030-11 PT206-0C030-14 PT206-0C050-09	X X	X X							Light Charcoal Oak	4 pc set 4 pc set
Sequoia Sequoia	PT206-0C050-11 PT926-0C084-11			X	X	X	x	x	x	Light Charcoal Gray	4 pc. set 4 pc. set 4 pc set
Sequoia Sequoia Sequoia - 7 Passenger	P1926-0C084-41 PT926-0C084-20 PT926-0C081-11						X X X	X X X	X X X	Black Gray	4 pc set 4 pc set 1 pc
Sequoia - 7 Passenger Sequoia - 7 Passenger Sequoia - 7 Passenger	PT926-0C081-20 PT926-0C081-41 PT926-0C087-11						X X X	X X X	x x x	Black Sand Beige Gray	1 pc 1 pc 1 pc
Sequoia - 7 Passenger Sequoia - 7 Passenger Seguoia - 8 Passenger	PT926-0C087-41 PT926-0C087-20 PT926-0C088-11						X X X	x x x	X X X	Sand Beige Black Grav	1 pc 1 pc 1 pc
Sequoia - 8 Passenger Sequoia Sequoia	PT926-0C088-41 PT926-0C104-01						X	X	x x	Sand Beige Dark Brown	1pc 4 pc set
Sequoia - 7 Passenger Sequoia - 7 Passenger Sequoia - 8 Passenger	PT926-0C107-01 PT9260C108-01								X X X	Dark Brown Dark Brown Dark Brown	1 pc 1 pc 1 pc
Sienna Sienna Sienna	P1208-08010-01 PT208-08010-04 PT208-08011-01	X X X								Oak Gray	6 pc (bench seat) 6 pc (bench seat) 5 pc (captains seat)
Sienna Sienna Sienna	PT208-08011-04 PT208-08030-01 PT208-08030-04	X X X								Oak Gray Oak	5 pc (captains seat) 6 pc (bench seat) 6 pc (bench seat)
Sienna Sienna Sienna	PT208-08031-01 PT208-08031-04 PT208-08021-01	X X X								Gray Oak Gray	5 pc (captains seat) 5 pc (captains seat) 5 pc set
Sienna Sienna	PT208-08021-04 PT208-08036-01 PT208-08036-04	X X								Oak Gray Oak	5 pc set 5 pc set
Sienna - 7 pass Sienna - 7 pass	PT208-08040-04 PT208-08040-21		X X	x x						Taupe Stone	4 pc set 4 pc set
Sienna - 7 pass Sienna - 7 pass Sienna - 7 pass	PT208-08041-04 PT208-08041-21 PT208-08048-04		X X X	X X X	x	x				Stone Taupe	5 pc set 5 pc set 6 pc set
Sienna - 7 pass Sienna - 8 pass Sienna - 8 pass	PT208-08048-21 PT208-08042-04 PT208-08042-21		X X X	X	X	X				Stone Taupe Stone	6 pc set 4 pc set 4 pc set
Sienna - 8 pass Sienna - 8 pass Sienna - 7 pass	PT208-08043-04 PT208-08043-21 PT206-08067-04		X X X	X X X	X X X	X X X				Taupe Stone Taupe	5 pc set 5 pc set 5 pc set
Sienna - 7 pass Sienna - 8 pass Sienna - 8 pass	PT206-08067-21 PT206-08068-04 PT206-08068-21		X X	X X	x x	X X				Stone Stone	5 pc set 4 pc set
Sienna - 7 pass Sienna - 7 pass	PT206-08087-41 PT206-08087-12		×		*		X X	X X	x x	Taupe Stone	6 pc set 6 pc set
Sienna - 8 pass Sienna - 8 pass Solara - Hard Top	P1206-08088-41 PT206-08088-12 PT206-06030-10	X					x	x	x	Stone Ivory	6 pc set 6 pc set 4 pc set
Solara - Hard Top Solara - Convertible Solara - Convertible	PT206-06030-11 PT206-06031-10 PT206-06031-11	X X X								Gray Ivory Gray	4 pc set 4 pc set 4 pc set
Solara - Convertible Solara - Convertible Solara - Convertible	PT208-06048-21 PT208-06048-11 PT208-06048-10		X X X	x x x	x x x	x x x				Dark Stone Dark Charcoal	4 pc set 4 pc set 4 pc set
Solara - Hard Top Solara - Hard Top Solara - Hard Top	PT208-06040-21 PT208-06040-11 PT208-06040-10		X X	x	x	X X				Dark Stone Dark Charcoal	4 pc set 4 pc set
Solara - Convertible Solara - Convertible	PT206-06068-21 PT206-06068-11			^	X X	X X	X X			Dark Stone Dark Charcoal	4 pc set 4 pc set 4 pc set
Solara - Convertible Solara - Coupe Solara - Coupe	P1206-06068-10 PT206-06060-21 PT206-06060-11				X X X	X X X	X X X			Dark Stone Dark Charcoal	4 pc set 4 pc set 4 pc set
Solara - Coupe Solara - Coupe Solara - Coupe	PT206-06060-10 PT206-06080-21 PT206-06080-11				x x x	x x x	X X X			lvory Dark Stone Dark Charcoal	4 pc set 4 pc set 4 pc set
Solara - Coupe Solara - Convertible Solara - Convertible	PT206-06080-10 PT206-06088-21 PT206-06088-11				X X X	x x x	X X X	x	x x	lvory Dark Stone Dark Charcoal	4 pc set 4 pc set 4 pc set
Solara - Convertible Tacoma - Reg Cab Tacoma - Reg Cab	PT206-06088-10 PT206-35010-11 PT206-35962-16	X	X		x	x	X	x	x	lvory Light Charcoal Oak	4 pc set 2 pc set 2 pc set
Tacoma - Access Cab Tacoma - Access Cab	PT206-35011-11 00200-35964-16 PT206-25012-11	X X	X X							Light Charcoal Oak	4 pc set 4 pc set
Tacoma - Double Cab Tacoma - Reg Cab	PT206-35012-11 PT206-35012-16 PT206-35050-11	X	X	x	x	x				Oak Light Charcoal	4 pc set 4 pc set 2 pc set
Tacoma - Reg Cab Tacoma - Access Cab Tacoma - Access Cab	PT206-35050-14 PT206-35051-11 PT206-35051-14			x x x	x x x	X X X				Light Charcoal Oak	4 pc set 4 pc set 4 pc set
Tacoma - Double Cab Tacoma - Double Cab Tacoma - Acc Cab TRD	PT206-35052-11 PT206-35052-14 PT206-35055-11			X X X	X X X	X X X				Light Charcoal Oak Charcoal	4 pc set 4 pc set 4 pc set
Tacoma - Dbl Cab TRD Tacoma - Reg Cab Tacoma - Reg Cab	PT206-35056-11 PT206-35080-11 PT206-35080-14			x	x	x	x x	x x	х	Charcoal Light Charcoal Oak	4 pc set 2 pc set 2 pc set
Tacoma - Access Cab Tacoma - Access Cab Tacoma - Double Cab	PT206-35081-11 PT206-35081-14 PT206-35082-11						X X X	X X X	x	Light Charcoal Oak	4 pc set 4 pc set 4 pc set
Tacoma - Double Cab Tacoma - Acc Cab TRD	PT206-35082-14 PT206-35085-11 PT206-35085-11						x	x	x	Oak Charcoal	4 pc set 4 pc set 4 pc set
Tacoma - Reg Cab Tacoma - Aces Cab	PT206-35090-43 PT206-35091-43							X X	X X	Sand Beige	2 pc set 4 pc set
Tacoma - Double Cab Tacoma - Reg Cab Tacoma - Reg Cab	PT206-35092-43 PT206-35100-13 PT206-35100-15							X	X X X	Light Charcoal	4 pc set 2 pc set 2 pc set
Tacoma - Access Cab Tacoma - Access Cab Tacoma - Double Cab	P1206-35101-13 PT206-35101-15 PT206-35102-13								x x x	Light Charcoal Dark Charcoal Light Charcoal	4 pc set 4 pc set 4 pc set
Tacoma - Double Cab Tacoma - Acc Cab TRD Tacoma - Dbl Cab TRD	PT206-35102-15 PT206-35105-13 PT206-35106-13								x x x	Dark Charcoal Light Charcoal Light Charcoal	4 pc set 4 pc set 4 pc set
Tundra - Reg Cab Tundra - Reg Cab Tundra - Reg Cab	PT548-34030-11 PT548-34030-12 PT548-34030-14	X X X	x x x	x						Light Charcoal Dark Charcoal Oak	2 pc set 2 pc set 2 pc set
Tundra - Access Cab Tundra - Access Cab Tundra - Access Cab	PT548-34031-11 PT548-34031-12 PT548-34031-14	X	x	x						Light Charcoal Dark Charcoal	4 pc set 4 pc set
Tundra - Access Cab Tundra - Access Cab	PT548-34032-11 PT548-34032-12 PT548-34032-12	X X	X X	X X						Light Charcoal Dark Charcoal	4 pc set 4 pc set
Tundra - Access Cab Tundra - D Cab Tundra - D Cab	PT548-34040-11 PT548-34040-12	×	X X X	x x x						Light Charcoal Dark Charcoal	4 pc set 4 pc set
Tundra - D Cab Tundra - Reg Cab Tundra - Reg Cab	PT548-34040-14 PT548-34051-09 PT548-34051-11		X	X X X	X X					Oak Taupe Light Charcoal	4 pc set 2 pc set 2 pc set
Tundra - Reg Cab Tundra - Access Cab Tundra - Access Cab	PT548-34051-12 PT548-34052-09 PT548-34052-11			x x x	x x x					Dark Charcoal Taupe Light Charcoal	2 pc set 4 pc set 4 pc set
Tundra - Access Cab Tundra - D Cab Tundra - D Cab	PT548-34052-12 PT548-34050-09 PT548-34050-11			x x x	x x x					Dark Charcoal Taupe Light Charcoal	4 pc set 4 pc set 4 pc set
Tundra - D Cab Tundra - D Cab Tundra - Reg Cab	PT548-34050-12 PT548-34062-11 PT206-34071-11			x	x x	x	×	×	×	Dark Charcoal Light Charcoal Graphite	4 pc set 4 pc set 2 pc set
Tundra - Reg Cab	PT206-34071-12 PT206-34071-43 PT206-24072-44					X X	X	X	X	Black Sand Beige	2 pc set
Tundra - D Cab & Crew Max Tundra - D Cab & Crew Max Tundra - D Cab & Crew Max	PT206-34072-11 PT206-34072-12 PT206-34072-43					X X X	X X	X X X	X X X	Black Sand Beige	4 pc set 4 pc set
Venza Yaris - Líft Back Yaris- Sedan	PT206-01090-20 PT206-52060-11 PT206-52061-11				x x	x x	X X	X	X	Black Dark Charcoal Dark Charcoal	4 pc set 4 pc set 4 pc set
Yaris- Sedan Yaris- Sedan Yaris - Lift Back	PT206-52090-40 PT206-52091-11 PT206-52100-18							X X	X X X	Bisque Dark Charcoal Dark Charcoal	4 pc set 4 pc set 4 pc set
Yaris- Sedan Yaris- Sedan	PT206-52100-45 PT206-52101-10								X X	Bisque Dark Charcoal	4 pc set 4 pc set

Toyota Carpet Floor Mat Quick Reference Chart (Sorted By Part Number)

Part Number	Model	<u>ت</u>	4	2	و	5	œ	6	•	Mat Des	cription
PT206-12092-14	Matrix - 2WD	0,	0,	0,	0,	0,	0,	0, X	х 2	Dark Charcoal	4 pc set
PT208-89031-04 00200-35964-16	4 Runner Tacoma -Access Cab	X X	x x	x	x	x				Oak Oak	4 pc set
PT208-89031-21 PT206-02030-03	4 Runner Corolla - Sport Edition (w/ Rear Heater)	x	x	X	x	x				Gray	4 pc set
PT206-02030-11 PT206-02030-16 PT206-02031-03	Corolla (w/ Rear Heater) Corolla (w/ Rear Heater)	X X								Oak Grav	4 pc set 4 pc set
PT206-02031-11 PT206-02031-16	Corolla (w/o Rear Heater) Corolla (w/o Rear Heater)	x x								Light Gray Oak	4 pc set 4 pc set
PT206-02040-03 PT206-02040-11	Corolla - Sport Edition (w/ Rear Heater) Corolla (w/ Rear Heater)	X X	x x	X X	x x	x x	X X			Gray Light Gray	4 pc set 4 pc set
PT206-02040-16 PT206-02041-03	Corolla (w/ Rear Heater) Corolla - Sport Edition (w/o Rear Heater)	x	x x	x	x x	x	x			Oak Gray	4 pc set 4 pc set
P1206-02041-11 PT206-02041-16 PT206-02050-01	Corolla (w/o Rear Heater) Corolla (w/o Rear Heater) Corolla (w/ Rear Heater)	X	X X	X X	X X	X X	X X			Oak Grav	4 pc set 4 pc set
PT206-02051-01 PT206-02090-12	Corolla (w/o Rear Heater) Corolla	X	x	x	x	x	X	x		Gray Dark Charcoal	4 pc set 4 pc set
PT206-02090-41 PT206-02091-12	Corolla Corolla							x x		Bisque Dark Charcoal	4 pc set 4 pc set
P1206-02091-41 PT206-02092-12 PT206-02092-41	Corolla Corolla							X X X	x	Bisque Dark Charcoal Bisque	4 pc set 4 pc set
PT206-02093-12 PT206-02093-41	Corolla Corolla							x	x	Dark Charcoal Bisque	4 pc set 4 pc set
PT206-02093-41 PT206-02102-45	Corolla Corolla							x	X X	Bisque Brown	4 pc set 4 pc set
PT206-06030-10 PT206-06030-11	Solara - Hard Top Solara - Hard Top	x								lvory Gray	4 pc set 4 pc set 4 pc set
PT206-06031-10 PT206-06031-11	Solara - Convertible Solara - Convertible	x x								lvory Gray	4 pc set 4 pc set
PT206-06060-10 PT206-06060-11 PT206-06060-21	Solara - Coupe Solara - Coupe				x	x	x			Ivory Dark Charcoal Dark Stope	4 pc set 4 pc set
PT206-06068-10 PT206-06068-11	Solara - Convertible Solara - Convertible				x x	x x	X X			Ivory Dark Charcoal	4 pc set 4 pc set 4 pc set
PT206-06068-21 PT206-06080-10	Solara - Convertible Solara - Coupe				x x	X X	X X			Dark Stone Ivory	4 pc set 4 pc set
PT206-06080-11 PT206-06080-21	Solara - Coupe Solara - Coupe				x x	X X	x x			Dark Charcoal Dark Stone	4 pc set 4 pc set
PT206-06088-10 PT206-06088-11 PT206-06088-21	Solara - Convertible Solara - Convertible Solara - Convertible				X X X	X X X	X X X	X X X	X X X	Dark Charcoal Dark Stone	4 pc set 4 pc set 4 pc set
PT206-07090-02 PT206-07090-16	Avalon Avalon							X X	x x	lvory Graphite	4 pc set 4 pc set
PT206-07090-17 PT206-07090-18 PT206-02007-01	Avalon Avalon							x	x x	Light Gray Dark Charcoal	4 pc set 4 pc set
PT206-08067-21 PT206-08068-04	Sienna - 7 pass Sienna - 7 pass Sienna - 8 pass		X X X	X X X	X X X	X X X				Stone Taupe	5 pc set 5 pc set 4 pc set
PT206-08068-21 PT206-08087-12	Sienna - 8 pass Sienna - 7 pass		х	х	х	х	x	x	x	Stone Stone	4 pc set 6 pc set
PT206-08087-41 PT206-08088-12	Sienna - 7 pass Sienna - 8 pass						x x	x	x x	Taupe Stone	6 pc set 6 pc set
PT206-08088-41 PT206-0C030-11 PT206-0C030-14	Sienna - 8 pass Sequoia Sequoia	x	x x				X	X	X	Light Charcoal Oak	4 pc set 4 pc set
PT206-0C050-09 PT206-0C050-11	Sequoia Sequoia			x x	x x	x x				Taupe Light Charcoal	4 pc. set 4 pc. set
PT206-0T090-20 PT206-12030-03	Venza Matrix - AWD (w/ heater)	x						x	x	Black Gray	4 pc set 4 pc set
PT206-12031-03 PT206-12032-03 PT206-12040-03	Matrix - 2WD (w/ neater) Matrix - 2WD (w/o heater) Matrix - AWD (w/ Rear Heater)	x x x	x	x	x					Gray Gray Gray	4 pc set 4 pc set 4 pc set
PT206-12041-03 PT206-12042-03	Matrix - 2WD (w/ Rear Heater) Matrix - 2WD (w/o Rear Heater)	x x	x x	x x	x x	x x	x x			Gray Gray	4 pc set 4 pc set
P1206-12070-03 PT206-12071-03 PT206-12090-14	Matrix (w/o heater) Matrix (w/ heater) Matrix - 2W/D					x		×	Y	Gray Gray Dark Charcoal	4 pc set 4 pc set
PT206-12091-14 PT206-12093-14	Matrix - AWD Matrix - AWD							x	X X	Dark Charcoal Dark Charcoal	4 pc set 4 pc set 4 pc set
PT206-20030-11 PT206-32060-11	Celica Camry / Camry Hybrid	x	x	x		x	x	x	x	Charcoal Ash	4 pc set 4 pc set
P1206-32060-12 PT206-32060-14 PT206-32078-40	Camry / Camry Hybrid Camry / Camry Hybrid Camry Hybrid					x x x	x	x	x	Dark Charcoal Bisque Bisque	4 pc set 4 pc set
PT206-32100-12 PT206-32100-45	Camry / Camry Hybrid Camry / Camry Hybrid					~			x x	Gray Brown	4 pc set 4 pc set
PT206-34071-11 PT206-34071-12	Tundra - Reg Cab Tundra - Reg Cab					x x	x	x	X	Graphite Black	2 pc set 2 pc set
PT206-34071-43 PT206-34072-11 PT206-34072-12	Tundra - Reg Cab Tundra - D Cab & Crew Max Tundra - D Cab & Crew Max					X X X	X X X	X X X	X X X	Graphite Black	2 pc set 4 pc set
PT206-34072-43 PT206-35010-11	Tundra - D Cab & Crew Max Tacoma - Reg Cab	x	x			x	x	x	x	Sand Beige Light Charcoal	4 pc set 2 pc set
PT206-35011-11 PT206-35012-11	Tacoma - Access Cab Tacoma - Double Cab	x	x x							Light Charcoal Light Charcoal	4 pc set 4 pc set
PT206-35012-16 PT206-35050-11 PT206-35050-14	Tacoma - Double Cab Tacoma - Reg Cab Tacoma - Reg Cab	×	x	x x	x x	x x				Light Charcoal Oak	2 pc set 2 pc set
PT206-35051-11 PT206-35051-14	Tacoma - Access Cab Tacoma - Access Cab			X X	x	x				Light Charcoal Oak	4 pc set 4 pc set
PT206-35052-11 PT206-35052-14 DT206-35055-14	Tacoma - Double Cab Tacoma - Double Cab			x	x x	X X				Light Charcoal Oak	4 pc set 4 pc set
PT206-35055-11 PT206-35056-11 PT206-35080-11	Tacoma - Dol Cab TRD Tacoma - Dol Cab TRD Tacoma - Reg Cab			X	X	X	X	X	x	Charcoal Light Charcoal	4 pc set 4 pc set 2 pc set
PT206-35080-14 PT206-35081-11	Tacoma - Reg Cab Tacoma - Access Cab						X X	X X	x	Oak Light Charcoal	2 pc set 4 pc set
PT206-35081-14 PT206-35082-11 PT206-35082-14	Tacoma - Access Cab Tacoma - Double Cab Tacoma - Double Cab						X X	X X	x	Oak Light Charcoal	4 pc set 4 pc set
PT206-35085-11 PT206-35086-11	Tacoma - Acc Cab TRD Tacoma - Dbl Cab TRD						X X	x x	x x	Charcoal Charcoal	4 pc set 4 pc set
PT206-35090-11 PT206-35090-43	FJ Cruiser Tacoma - Reg Cab							X X	x	Charcoal Sand Beige	4 pc. set 2 pc set
PT206-35091-43 PT206-35092-43 PT206-35100-13	Tacoma - Access Cab Tacoma - Double Cab Tacoma - Reg Cab							X X	X X X	Sand Beige Sand Beige	4 pc set 4 pc set
PT206-35100-15 PT206-35101-13	Tacoma - Reg Cab Tacoma - Access Cab	E							X X	Dark Charcoal Light Charcoal	2 pc set 4 pc set
PT206-35101-15 PT206-35102-13 PT206-25102-15	Tacoma - Access Cab Tacoma - Double Cab								x x	Dark Charcoal Light Charcoal	4 pc set 4 pc set
PT206-35102-15 PT206-35105-13 PT206-35106-13	Tacoma - Acc Cab TRD Tacoma - Dol Cab TRD								x x x	Light Charcoal Light Charcoal	4 pc set 4 pc set 4 pc set
PT206-35962-16 PT206-52060-11	Tacoma - Reg Cab Yaris - Lift Back	X	х		x	x	x	X	X	Oak Dark Charcoal	2 pc set 4 pc set
P1206-52061-11 PT206-52090-40 PT206-52091-11	Yaris- Sedan Yaris- Sedan Varis- Sedan				X	X	X	X	X	Dark Charcoal Bisque	4 pc set 4 pc set
PT206-52100-18 PT206-52100-45	Yaris - Lift Back Yaris - Sedan								X X	Dark Charcoal Bisque	4 pc set 4 pc set 4 pc set
PT206-52101-10 PT206-60032-10	Yaris- Sedan Land Cruiser	x	х	Х	х	х			X	Dark Charcoal Ivory	4 pc set 3 pc set
P1206-60032-11 PT206-60080-01 PT206-60080-10	Land Cruiser Land Cruiser	×	X	X	X	X	X	x	x	Dark Stone Gray	3 pc set
PT206-60100-45 PT208-06040-10	Land Cruiser Solara - Hard Top		x	x	x	x			x	Brown	3 pc set 4 pc set
PT208-06040-11 PT208-06040-21	Solara - Hard Top Solara - Hard Top		X X	X X	X X	X X				Dark Charcoal Dark Stone	4 pc set 4 pc set
PT208-06048-10 PT208-06048-11 PT208-06048-21	Solara - Convertible Solara - Convertible Solara - Convertible		X X X	X X X	X X X	X X X				Ivory Dark Charcoal Dark Stone	4 pc set 4 pc set 4 pc set
PT208-07000-08 PT208-07000-15	Avalon Avalon	x x	X X	X X						lvory Taupe	4 pc set 4 pc set
PT208-07000-23	Avalon	х	х	х						Stone	4 pc set

Part Number	Model	8	4	5	9	20	8	6	0	Mat Des	cription Piece Set No
PT208-07040-04	Avalon	, x	, x	, x	,	,	,	,	5	Taupe	4 pc set
PT208-07040-10 PT208-07040-21	Avalon Avalon	x	X X	x x						Ivory Stone	4 pc set 4 pc set
PT208-08010-01 PT208-08010-04	Sienna Sienna	x								Gray Oak	6 pc (bench seat) 6 pc (bench seat)
PT208-08011-01 PT208-08011-04	Sienna Sienna	X X								Gray Oak	5 pc (captains seat) 5 pc (captains seat)
PT208-08021-01 PT208-08021-04	Sienna Sienna	X X								Gray Oak	5 pc set 5 pc set
PT208-08030-01 PT208-08030-04	Sienna Sienna	X X								Gray Oak	6 pc (bench seat) 6 pc (bench seat)
PT208-08031-01 PT208-08031-04	Sienna Sienna	x								Gray Oak	5 pc (captains seat) 5 pc (captains seat)
PT208-08036-01 PT208-08036-04	Sienna Sienna	x x								Gray Oak	5 pc set 5 pc set
PT208-08040-04 PT208-08040-21	Sienna - 7 pass Sienna - 7 pass		X X	X X						Taupe Stone	4 pc set 4 pc set
PT208-08041-04 PT208-08041-21	Sienna - 7 pass Sienna - 7 pass		X X	X X						Taupe Stone	5 pc set 5 pc set
PT208-08042-04 PT208-08042-21	Sienna - 8 pass Sienna - 8 pass		x x							Taupe Stone	4 pc set 4 pc set
PT208-08043-04 PT208-08043-21	Sienna - 8 pass Sienna - 8 pass		x	x	X X	x				I aupe Stone	5 pc set 5 pc set
PT208-08048-04 PT208-08048-21	Sienna - 7 pass Sienna - 7 pass		x	x	x	x				Stone	6 pc set
PT208-32020-01 PT208-32020-04	Camry	X	x	x	x					Taupe	4 pc set 4 pc set
PT208-32020-21 PT208-32041-01 PT208-32041-04	Camry - SE	×	x	x	×					Gray	4 pc set
PT208-42020-11 PT208-42021-03	Rav 4 - EV	x	^	^						Gray	4 pc set
PT208-42021-05 PT208-42021-15 PT208-42041-01	Rav 4	x	×	v						Taupe Dark Gray	4 pc set
PT208-42041-03 PT208-42041-04	Rav 4 Rav 4	х	x	x						Gray	4 pc set
PT208-42044-15 PT208-42051-04	Rav 4 Rav 4 (w/o 3rd row)	х			x	x	x			Taupe Taupe	4 pc set 4 pc set
PT208-42051-11 PT208-42051-31	Rav 4 (w/o 3rd row) Rav 4 (w/o 3rd row)				x x	x x	x x	x x	x x	Dark Charcoal Ash	4 pc set 4 pc set
PT208-42061-04 PT208-42061-31	Rav 4 (w/ 3rd row) Rav 4 (w/ 3rd row)				x x	x x	x x	x	x	Taupe Ash	4 pc set 4 pc set
PT208-42081-40 PT208-42083-40	Rav 4 (w/o 3rd row) Rav 4 (w/ 3rd row)							X X	x x	Sand Beige Sand Beige	4 pc set 4 pc set
PT208-42091-11 PT208-47010-03	Rav 4 - Sport (w/o 3rd row) Prius	x						x	x	Dark Charcoal Gray	4 pc set 4 pc set
PT208-47030-02 PT208-47045-10	Prius Prius	x	x	x						Gray Ivory	4 pc set 4 pc set
PT208-47045-11 PT208-47060-14	Prius Prius		X	х	X X	x x	x x	X X		Dark Gray Dark Bisque	4 pc set 4 pc set
P1208-48010-01 PT208-48010-10	Highlander Highlander	x								Gray Ivory	4 pc set 4 pc set
PT208-48041-10 PT208-48041-31 PT208-48042-10	Highlander (W/ 3rd row) Highlander (w/ 3rd row)		X X	X X	X X					Ash	5 pc set 5 pc set
PT208-48042-10 PT208-48042-31 PT208-48061-10	Highlander (w/o 3rd row) Highlander (w/o 3rd row)		x	x	X X					Ash	4 pc set 4 pc set
PT208-48061-31 PT208-52030-11	Highlander - Hybrid (w/ 3rd row) Echo (2 door w/ rear beater)	×	x	x	X					Ash Dark Gray	4 pc set
PT208-52030-44 PT208-52031-11	Echo (2 door w/ rear heater) Echo (4 door w/ rear heater)	X	x	x x						Beige Dark Grav	4 pc set
PT208-52031-44 PT208-52033-11	Echo (4 door w/ rear heater) Echo (2 door w/o rear heater)	x	x x	x x						Beige Dark Gray	4 pc set 4 pc set
PT208-52033-44 PT208-52034-11	Echo (2 door w/o rear heater) Echo (4 door w/o rear heater)	x	x x	x x						Beige Dark Gray	4 pc set 4 pc set
PT208-52034-44 PT208-89004-20	Echo (4 door w/o rear heater) 4 Runner	X	X	x					х	Beige Black	4 pc set 4 pc set
PT208-89030-04 PT208-89030-21	4 Runner 4 Runner	X	x x	x	x x	x	x	x		Taupe Stone	4 pc set 4 pc set
P1548-07050-10 PT548-07050-11 PT548_07050_12	Avalon Avalon			x	X X	x	x	x	x x	Light Gray	4 pc set 4 pc set
PT548-07050-12 PT548-07050-22 PT548-07070-10	Avalon Avalon Avalon			x	x	x	x	x	X	Graphite	4 pc set
PT548-07070-11 PT548-07070-12	Avalon Avalon					x	x	X X	X X	Light Gray Dark Charcoal	4 pc set
PT548-07070-22 PT548-17030-02	Avalon MR2 Spyder	x				x	x	x	x	Graphite Black w/ Red Logo	4 pc set 2 pc set
PT548-17030-09 PT548-17030-13	MR2 Spyder MR2 Spyder	X X								Black w/ Yellow Logo Black w/ Silver Logo	2 pc set 2 pc set
PT548-17030-24 PT548-17031-13	MR2 Spyder MR2 Spyder	x	x	x						Black w/ Tan Logo Black w/ Silver Logo	2 pc set 2 pc set
P1548-17031-24 PT548-34030-11	MR2 Spyder Tundra - Reg Cab	X	X X	X						Black w/ Tan Logo Light Charcoal	2 pc set 2 pc set
P1548-34030-12 PT548-34030-14 PT548-34031-11	Tundra - Reg Cab Tundra - Reg Cab	X	x	x	-					Oak	2 pc set 2 pc set
PT548-34031-11 PT548-34031-12 PT548-34031-14	Tundra - Access Cab Tundra - Access Cab	X	x	x						Dark Charcoal	4 pc set
PT548-34032-11 PT548-34032-12	Tundra - Access Cab Tundra - Access Cab	X	x	x						Light Charcoal	4 pc set
PT548-34032-14 PT548-34040-11	Tundra - Access Cab Tundra - D Cab	x	x	x						Oak Light Charcoal	4 pc set 4 pc set
PT548-34040-12 PT548-34040-14	Tundra - D Cab Tundra - D Cab		x x	x x						Dark Charcoal Oak	4 pc set 4 pc set
PT548-34050-09 PT548-34050-11	Tundra - D Cab Tundra - D Cab			x x	x x					Taupe Light Charcoal	4 pc set 4 pc set
PT548-34050-12 PT548-34051-09	Tundra - D Cab Tundra - Reg Cab			x x	x x					Dark Charcoal Taupe	4 pc set
PT548-34051-11 PT548-34051-12	Tundra - Reg Cab Tundra - Reg Cab			x x	X X					Light Charcoal Dark Charcoal	2 pc set 2 pc set
PT548-34052-09 PT548-34052-11 PT548-24052-42	Tundra - Access Cab			X X	X X					Light Charcoal	4 pc set 4 pc set
PT548-34062-12 PT548-34062-11 PT548-48060-10	Tundra - Access Gab Tundra - D Cab			×	x	~				Light Charcoal	4 pc set
PT548-48060-31 PT548-48062-10	Highlander (w/o 3rd row) Highlander - Hybrid (w/ 3rd row)	-			X X Y	X X X				Ash	4 pc set 5 pc set
PT548-48062-31 PT548-48063-10	Highlander - Hybrid (w/ 3rd row) Highlander (w/ 3rd row)				X X	x				Ash	5 pc set 5 pc set
PT548-48063-31 PT548-48074-10	Highlander (w/ 3rd row) Highlander - Hybrid (w/o 3rd row)				x	x				Ash Ivory	5 pc set 4 pc set
PT548-48074-31 PT548-60070-11	Highlander - Hybrid (w/o 3rd row) FJ Cruiser				х	x x	x	x	x	Ash Charcoal	4 pc set 4 PC Set
PT919-48080-11 PT919-48080-22	Highlander - Gas Highlander - Gas						x x	x x	x x	Black Ash	3 pc set 3 pc set
PT919-48080-41 PT919-48081-22	Highlander - Gas Highlander - Hybrid						X X	x x	x x	Sand Beige Ash	3 pc set 3 pc set
PT919-48081-41 PT919-48082-11	Highlander - Hybrid Highlander - Gas & Hybrid						X X	X X	X X	Sand Beige Black	3 pc set 1 pc
P1919-48082-22 PT919-48082-41	Highlander - Gas & Hybrid Highlander - Gas & Hybrid						x	X X	x	Ash Sand Beige	1 pc 1 pc
PT926-0C081-11 PT926-0C081-20 PT926-0C081-44	Sequoia - 7 Passenger Sequoia - 7 Passenger						x	x	X X	Black	1 pc
PT926-0C084-11 PT926-0C084-20	Sequoia Sequoia						X	X	X	Gray	4 pc set
PT926-0C084-41 PT926-0C087-11	Sequoia Sequoia Sequoia - 7 Passenger						x	x	X	Sand Beige Grav	4 pc set
PT926-0C087-20 PT926-0C087-41	Sequoia - 7 Passenger Seguoia - 7 Passenger						x	x	x	Black Sand Beige	1 pc
PT926-0C088-11 PT926-0C088-41	Sequoia - 8 Passenger Sequoia - 8 Passenger						x	x	x	Gray Sand Beige	1 pc
PT926-0C101-01 PT926-0C104-01	Sequoia - 7 Passenger Sequoia								x x	Dark Brown Dark Brown	1 pc 4 pc set
PT926-0C107-01 PT9260C108-01	Sequoia - 7 Passenger Sequoia - 8 Passenger								x x	Dark Brown Dark Brown	1 pc 1 pc
PT926-47100-10 PT926-47100-11	Prius Prius								x x	Misty Gray Dark Gray	4 pc set 4 pc set
PT926-47100-40	Prius		L	L	L	L		L	х	Black	4 pc set



Toyota All Weather Floor Mat Quick Reference Chart (Sorted By Model)

	De (N. el el				Mode	l Year				Mat D	escription
Model	Part Number	2003	2004	2005	2006	2007	2008	2009	2010	Color	Piece Set No.
4 Runner	PT206-89036-03	Х	Х							Gray	4 pc set
4 Runner	PT206-89036-16 PT908-89060-02	X	X	x	x	x	x	x		Oak Black	4 pc set
4 Runner	PT908-89100-02					^	^	^	x	Black	4 pc set
Avalon Avalon	PT206-07026-03 PT206-07026-16	x	x							Gray	4 pc set
Avalon	PT908-07050-02	~	~	x	х	Х	x	x	x	Black	4 pc set
Avalon	PT908-07050-14	×		x	x	х	х	х	x	Brown	4 pc set
Camry	PT206-03026-16	x								Oak	4 pc set
Camry	PT206-03036-03 PT206-03036-16	x	x	x	x					Gray	4 pc set
Camry (Front Mats)	PT908-0307F-02	^	^	^	^	Х	x			Black	1 pc
Camry (Front Mats)	PT908-0307F-14	-				X	x			Brown	1 pc
Do not use these floor mats.*	PT908-32070-02 PT908-32070-14*					X				Brown	4 pc set
Camry	PT908-03071-02					X	x	x	x	Black	4 pc set
Corolla (w/o heater)	PT206-02035-03	x				×	*	~	~	Gray	4 pc set
Corolla (w/o heater)	PT206-02035-16	x								Oak	4 pc set
Corolla (w/ heater)	PT206-02036-03	X								Oak	4 pc set
Corolla (w/o heater)	PT206-02038-03	x	x	x	x	X	X			Gray	4 pc set
Corolla (w/ heater)	PT206-02039-03	X	X	x	x	X	x			Gray	4 pc set
Corolla (w/ heater)	PT206-02039-16	x	x	х	x	х	х	v	×	Oak	4 pc set
Echo	PT206-52026-03	x						^	^	Gray	4 pc set
Echo E L Cruisor	PT206-52036-03	х	x	х		v				Gray	4 pc set
FJ Cruiser	PT548-60072-01					X				Black	4 pc set
FJ Cruiser - TRD	PT548-60074-01					X				Black	4 pc set
FJ Cruiser	PT548-60075-01 PT548-60076-01					X	x	х	х	Black	4 pc set
FJ Cruiser - Trail Team	PT548-60080-01						x	х	х	Black	4 pc set
Highlander	PT206-48035-03	x								Gray	4 pc set
Highlander	PT206-48026-16	X								Oak	4 pc set
Highlander	PT206-48045-03	X	x	x	x					Gray	4 pc set
Highlander	PT206-48045-16		Х	X	X					Oak	4 pc set
Hignlander - Hybrid Highlander - Hybrid	PT908-48055-02 PT908-48055-14			X X	X	X				Black Brown	3 pc kit
Highlander	PT908-48065-02				x	x				Black	4 pc set
Highlander Highlander	PT908-48065-14 PT908-48087-22				X	Х	x			Brown Black	4 pc set 4 pc set
Highlander	PT908-4808G-02						Х	Х	Х	Black	4 pc set
Highlander – 3 rd Row Highlander - Hybrid	PT908-48083-02 PT908-48088-22						X X	X X	x	Black	1 pc 4 pc set
Land Cruiser	PT206-60026-03	x								Gray	4 pc set
Land Cruiser	PT206-60036-03 PT206-60026-16	x	X	X						Oak	4 pc set 4 pc set
Land Cruiser	PT206-60036-16	х	x	х						Oak	4 pc set
Land Cruiser	PT908-60065-02 PT908-60065-14				x	X				Black Brown	4 pc set 4 pc set
Land Cruiser	PT908-60083-02						х	х	x	Black	4 pc set
Matrix - 2WD (w/ heater)	PT206-12035-02 PT206-12035-03	x					Х	X	X	Black Gray	1 pc 4 pc set
Matrix - AWD (w/ heater)	PT206-12036-03	х								Gray	4 pc set
Matrix - 2WD (w/o heater) Matrix - 2WD (w/ heater)	PT206-12037-03 PT206-12038-03	x	x	x	x	х	x			Gray Gray	4 pc set 4 pc set
Matrix - AWD (w/ heater)	PT206-1203A-03	x	X	X	X					Gray	4 pc set
Matrix - 2WD (w/o heater) Matrix - AWD	PT206-12039-03 PT908-12090-02	X	X	X	X	X	Х	x	x	Gray Black	4 pc set 4 pc set
Matrix - 2WD	PT908-12290-02							Х	х	Black	4 pc set
Prius	PT908-21050-02 PT908-21051-02			X	X	х	x	х		Black	4 pc set 4 pc set
Prius	PT908-47100-02								х	Black	4 pc set
Rav 4 Rav 4	PT206-42026-03 PT206-42026-16	x								Oak	4 pc set 4 pc set
Rav 4	PT206-42036-03	х								Gray	4 pc set
Rav 4 Rav 4	PT206-42036-16 PT206-42046-03	X	x	x						Gray	4 pc set 4 pc set
Rav 4	PT206-42046-16		х	х						Oak	4 pc set
Rav 4 (w/o 3rd row) Rav 4 (w/ 3rd row)	PT908-42060-02 PT908-42061-02				X X	X	X X	X X	X X	Black Black	4 pc set 4 pc set
Sequoia	PT206-0C026-03	х								Gray	4 pc set
Sequoia	PT206-0C026-16 PT206-0C036-03	x	x	x						Gray	4 pc set 4 pc set
Sequoia	PT206-0C036-16	х	x	х						Oak	4 pc set
Sequoia	PT908-0C050-02 PT908-0C050-14				X	X	X			Gary Oak	4 pc set 4 pc set
Sequoia	PT908-0C084-02							Х	X	Black	4 pc set
Sequoia – 3° Row	PT206-08036-03		X	x	x	x		X	X	Gray	4 pc set
Sienna	PT206-08036-16		X	x	X	X				Oak	4 pc set
Sienna – 3 rd Row	PT206-08037-03 PT206-08037-16		x	x	X	X				Oak	2 pc set
Sienna - 7 & 8 pass	PT908-08060-11					X	X	X	X	Gray	5 pc set
Sienna - 7 & 8 pass	PT908-08063-11					X	x	x	x	Gray	3 pc set
Sienna - 7 & 8 pass	PT908-08063-44					х	х	х	х	Brown	3 pc set
Tacoma - Front	PT206-3503F-03 PT206-3503F-16	x	L							Oak	≥ pc set 2 pc set
Tacoma - Rear	PT206-3503B-03	X								Gray	2 pc set
Tacoma - Rear	PT206-3504F-03	x	x							Gray	2 pc set
Tacoma - Front	PT206-3504F-16	X	X							Oak	2 pc set
Tacoma - Rear	PT206-3504B-03 PT206-3504B-16	X	x							Oak	2 pc set
Tacoma - Reg Cab	PT908-3505B-02			X	X	X	X			Black	2 pc set
Tacoma - Double Cab	PT908-3505D-02			x	X	X	x			Black	4 pc set
Tacoma - SE Acc Cab	PT908-35S8C-02						X			Black	4 pc set
Tacoma - Reg Cab	PT908-3507B-02						x	x	x	Black	2 pc set
Tacoma - Access Cab	PT908-3507C-02						x	x	x	Black	4 pc set
Tundra - Reg / Access Cab (Front)	PT206-3403F-03	x	x	x	x		×	x	X	Gray	2 pc set
Tundra - Reg / Access Cab (Front)	PT206-3403F-16	X	X	X	X					Oak	2 pc set
Tundra - Access Cab (Rear)	PT206-3403B-03	x	x	x	X					Oak	2 pc set
Tundra - Double Cab	PT206-34046-03		X	x	X					Gray	4 pc set
Tundra - Reg Cab	PT908-3405B-02		×	x	X					Black	2 pc set
Tundra - Reg Cab	PT908-3405B-14			x	X					Oak	2 pc set
Tundra - Access Cab	PT908-3405C-02			X	X					Oak	4 pc set
Tundra - Double Cab	PT908-3405D-02			X	X					Black	4 pc set
Tundra - Reg Cab	PT908-3407B-22			X	X	х	x	х		Black	2 pc set
Tundra - D Cab & Crew Max	PT908-3407C-22					х	х	x	, v	Black	4 pc set
Tundra - D Cab & Crew Max	PT908-3410B-02 PT908-3410C-02								x	Black	4 pc set
Venza	PT908-0T090-02		1					х	х	Black	4 pc set

*These mats were recalled in SSC 70F. Regularly verify that all AWFM involved in SSC 70F have been purged from your parts inventory and deemed unusable. Please use part number PT908-0307F-02 (Black) or PT908-0307F-14 (Brown) in place of the recalled AWFM (refer to SSC 70F on TIS for further information).

Toyota All Weather Floor Mats (Sorted By Part Number)

Part Number	Model			1	Mode	el Year	1	1		Mat D	Description
PT206-02035-03	Corolla (w/o beater)	2003	2004	2005	2006	2007	2008	2009	2010	Color	Piece Set No.
PT206-02035-03 PT206-02035-16 PT206-02036-03	Corolla (w/o heater)	X								Oak	4 pc set
PT206-02036-03 PT206-02036-16 PT206-02038-03	Corolla (w/ heater)	X	×	v	×	v	×			Oak	4 pc set
PT206-02038-03 PT206-02038-16	Corolla (w/o heater)	X	X	X	X	X	X			Oak	4 pc set
PT206-02039-03 PT206-02039-16 PT206-02026-02	Corolla (w/ heater)	X	X	x	x	x	X			Oak	4 pc set 4 pc set
PT206-03026-03 PT206-03026-16	Camry	x								Oak	4 pc set 4 pc set
PT206-03036-03 PT206-03036-16	Camry Camry	x	x	X X	x					Gray Oak	4 pc set 4 pc set
P1206-07026-03 PT206-07026-16	Avalon Avalon	X X	X X							Gray Oak	4 pc set 4 pc set
PT206-08036-03 PT206-08036-16	Sienna Sienna		X X	X X	X X	X X				Gray Oak	4 pc set 4 pc set
PT206-08037-03 PT206-08037-16	Sienna – 3 rd Row Sienna – 3 rd Row		x x	X X	X X	X X				Gray Oak	2 pc set 2 pc set
PT206-0C026-03 PT206-0C026-16	Sequoia Sequoia	X X								Gray Oak	4 pc set 4 pc set
PT206-0C036-03 PT206-0C036-16	Sequoia Sequoia	x x	x x	x x						Gray Oak	4 pc set 4 pc set
PT206-12035-03 PT206-12036-03	Matrix - 2WD (w/ heater) Matrix - AWD (w/ heater)	X X								Gray Gray	4 pc set 4 pc set
PT206-12037-03 PT206-12038-03	Matrix - 2WD (w/o heater) Matrix - 2WD (w/ heater)	X X	x	x	x	x	x			Gray Gray	4 pc set 4 pc set
PT206-12039-03 PT206-1203A-03	Matrix - 2WD (w/o heater) Matrix - AWD (w/ heater)	X X	x x	x x	x x	х	х			Gray Gray	4 pc set 4 pc set
PT206-3403B-03 PT206-3403B-16	Tundra - Access Cab (Rear) Tundra - Access Cab (Rear)	X X	x x	x x	x x					Gray Oak	2 pc set 2 pc set
PT206-3403F-03 PT206-3403F-16	Tundra - Reg / Access Cab (Front) Tundra - Reg / Access Cab (Front)	x	x x	x x	x x					Gray Oak	2 pc set 2 pc set
PT206-34046-03 PT206-34046-16	Tundra - Double Cab		x	X	X					Gray	4 pc set
PT206-3503B-03 PT206-3503B-16	Tacoma - Rear	X	~	~	~					Gray	2 pc set
PT206-3503E-16 PT206-3503E-16	Tacoma - Front	x								Gray	2 pc set
PT206-3504B-03	Tacoma - Rear	X	X							Gray	2 pc set
PT206-3504F-03	Tacoma - Rear Tacoma - Front	X X	X X							Gray	2 pc set
PT206-42026-03	Rav 4	x	x							Gray	∠ pc set
P1206-42026-16 PT206-42036-03	Rav 4 Rav 4	x								Oak Gray	4 pc set 4 pc set
PT206-42036-16 PT206-42046-03	Rav 4 Rav 4	X	х	x						Oak Gray	4 pc set 4 pc set
PT206-42046-16 PT206-48026-03	Rav 4 Highlander	X	X	X						Oak Gray	4 pc set 4 pc set
PT206-48026-16 PT206-48035-03	Highlander Highlander	x								Oak Gray	4 pc set 4 pc set
PT206-48035-16 PT206-48045-03	Highlander Highlander	x	x	x	x					Oak Gray	4 pc set 4 pc set
PT206-48045-16 PT206-52026-03	Highlander Echo	X	x	x	x					Oak Gray	4 pc set 4 pc set
PT206-52036-03 PT206-60026-03	Echo Land Cruiser	x x	x	x						Gray Gray	4 pc set 4 pc set
PT206-60026-16 PT206-60036-03	Land Cruiser Land Cruiser	X X	x	x						Oak Gray	4 pc set 4 pc set
PT206-60036-16 PT206-89036-03	Land Cruiser 4 Runner	X X	x x	x						Oak Gray	4 pc set 4 pc set
PT206-89036-16 PT548-60070-01	4 Runner FJ Cruiser	X	X			x				Oak Black	4 pc set 4 pc set
PT548-60072-01 PT548-60074-01	FJ Cruiser FJ Cruiser - TRD					x x				Black Black	4 pc set 4 pc set
PT548-60075-01 PT548-60076-01	FJ Cruiser FJ Cruiser					х	x	x	x	Black Black	4 pc set 4 pc set
PT548-60080-01 PT908-02090-02	FJ Cruiser - Trail Team Corolla						x	x	x	Black	4 pc set
PT908-03071-02 PT908-03071-14	Camry					x	x	x	x	Black	4 pc set
PT908-0307F-02 PT908-0307F-14	Camry (Front Mat)					X	X			Black	1 pc
PT908-07050-02	Avalon			x	x	x	X	x	X	Black	4 pc set
PT908-08060-11 PT908-08060-11	Sienna - 7 & 8 pass			^	^	x	x	x	X	Gray	5 pc set
PT908-08063-11 PT908-08063-44	Sienna - 7 & 8 pass					X	X	x	X	Gray	3 pc set
PT908-06063-44 PT908-0C050-02 PT908-0C050-14	Sierina - 7 & o pass Sequoia				x	X	X			Gary	4 pc set
PT908-0C030-14 PT908-0C083-02	Sequoia – 3 rd Row							x	X	Black	1 pc
PT908-0C084-02 PT908-0T090-02	Venza							X	X X	Black	4 pc set 4 pc set
PT908-12090-02 PT908-12290-02	Matrix - AWD Matrix - 2WD							x	X X	Black	4 pc set 4 pc set
PT908-21050-02 PT908-21051-02	Prius			x	x	x	x	x		Black	4 pc set 4 pc set
PT908-32070-02* PT908-32070-14*	Do not use these floor mats.*					x				Black Brown	4 pc set 4 pc set
PT908-3405B-02 PT908-3405B-14	Tundra - Reg Cab Tundra - Reg Cab			X X	x x					Black Oak	2 pc set 2 pc set
P1908-3405C-02 PT908-3405C-14	Tundra - Access Cab Tundra - Access Cab			X X	X X					Black Oak	4 pc set 4 pc set
PT908-3405D-02 PT908-3407B-22	I undra - Double Cab Tundra - Reg Cab			x	x	x	x	x		Black	4 pc set 2 pc set
PT908-3407C-22 PT908-3410B-02	Tundra - D Cab & Crew Max Tundra - Reg Cab					x	x	x	x	Black Black	4 pc set 2 pc set
PT908-3410C-02 PT908-3505B-02	I undra - D Cab & Crew Max Tacoma - Reg Cab			x	x	x	x		x	Black Black	4 pc set 2 pc set
PT908-3505C-02 PT908-3505D-02	Tacoma - Access Cab Tacoma - Double Cab			X X	X X	X X	x x			Black Black	4 pc set 4 pc set
PT908-3505D-14 PT908-3507B-02	Tundra - Double Cab Tacoma - Reg Cab			x	х		x	x	x	Oak Black	4 pc set 2 pc set
PT908-3507C-02 PT908-3507D-02	Tacoma - Access Cab Tacoma - Double Cab						x x	x x	x x	Black Black	4 pc set 4 pc set
PT908-35S8C-02 PT908-35S8D-02	Tacoma - SE Acc Cab Tacoma - SE Dbl Cab						x x			Black Black	4 pc set 4 pc set
PT908-42060-02 PT908-42061-02	Rav 4 (w/o 3rd row) Rav 4 (w/ 3rd row)				x x	x x	x x	x x	x x	Black Black	4 pc set 4 pc set
PT908-47100-02 PT908-48055-02	Prius Highlander - Hybrid			x	x	x			Х	Black Black	4 pc set 3 pc kit
PT908-48055-14 PT908-48065-02	Highlander - Hybrid Highlander			х	x x	x x				Brown Black	3 pc kit 4 pc set
PT908-48065-14 PT908-48083-02	Highlander Highlander – 3 rd Row				х	х	x	x	x	Brown Black	4 pc set
PT908-48087-22 PT908-48088-22	Highlander Highlander - Hybrid						X	x	x	Black	4 pc set
PT908-4808G-02 PT908-60065-02	Highlander Land Cruiser				¥	¥	x	x	X	Black	4 pc set
PT908-60065-14 PT908-60083-02	Land Cruiser				x	x	v	v	y	Brown	4 pc set
PT908-60085-02	Land Cruiser – 3 rd Row			v	v	v	x	X	x	Black	
PT908-89100-02	4 Runner	1			^	^	<u> </u>		x	Black	4 pc set

*These mats were recalled in SSC 70F. Regularly verify that all AWFM involved in SSC 70F have been purged from your parts inventory and deemed unusable. Please use part number PT908-0307F-02 (Black) or PT908-0307F-14 (Brown) in place of the recalled AWFM (refer to SSC 70F on TIS for further information).



News

xxx, September xxx, 2007 NHTSA xxxx

Contact: Rae Tyson: (202) 366-9550

NHTSA CONSUMER SAFETY ALERT: Secure Floor Mats in 2007 Lexus ES 350, Camry, Other Toyotas. Alert Also Extended to Other Vehicles.

Toyota to Conduct Floor Mat Recall

Owners of 2007 Lexus ES 350 models and certain other Toyota vehicles are being urged to make sure the driver-side, All Season floor mats are properly secured before driving the vehicles, according to the National Highway Traffic Safety Administration and Toyota Motor Company.

Toyota announced it will conduct a recall of all the affected floor mats, which are used in the 2007 Lexus ES 350 as well as the 2007 Camry.

NHTSA and Toyota noted that, if unsecured, the mats being recalled can slip forward and trap the accelerator pedal, causing the vehicle to accelerate uncontrollably.

Although not part of the recall, NHTSA urged drivers of other Toyota models, including Avalons and Prius hybrids, to check the driver-side floor mats to make sure they are properly installed.

While the recall is underway, drivers of these Toyota vehicles are strongly urged to make sure the driver-side floor mat is properly secured to the retention hooks on the floorboard. Also, never overlay two mats on top of each other because the retention hooks cannot secure the topmost mat which can then can slip and trap the accelerator pedal.

Of course, depending on vehicle design, it is possible for unsecured floor mats to interfere with accelerator or brake pedals in a wide range of vehicles. Therefore, NHTSA reminds all drivers of all makes and models to check the driver-side floor mats for secure installation and to follow manufacturer instructions for installing the mats.

For more information, consumers can contact the National Highway Traffic Safety Administration's Hotline at 888-327-4236 or their Toyota or Lexus dealer.



Example of an unsecured driver-side floor mat trapping the accelerator pedal in a 2007 Lexus ES350



Always make sure your driver-side floor mat is properly secured by the tabs. Never overlay two mats on top of each other because the top-most mat can not be secured properly by the retention hooks.

To view high resolution versions of the above images, click here and here.

TOYOTA MOTOR NORTH AMERICA, INC.

 WASHINGTON OFFICE
 TEL: (202) 775-1700

 601 THIRTEENTH STREET, NW, SUITE 910 SOUTH, WASHINGTON, DC 20005
 FAX: (202) 463-8513

October 8, 2009

Mr. Daniel C. Smith Associate Administrator for Enforcement National Highway Traffic Safety Administration 1200 New Jersey Avenue, S.E. Washington, D.C. 20590

RE: Dealer Communications - Certain Toyota and Lexus Vehicles Potential Floor Mat Interference with Accelerator Pedal

Dear Mr. Smith:

On behalf of Toyota Motor Corporation, please find the enclosed copy of the consumer advisory information as transmitted to our dealers regarding this issue.

Should you have any questions about this information, please let me know at (202) 775-1707.

Sincerely,

TOYOTA MOTOR NORTH AMERICA, INC.

Chris Santucci Assistant Manager Technical & Regulatory Affairs

George Morino / TMS Toyota Customer Services Quality Compliance September 29, 2009 Approved By: Bob Waltz

To: All Toyota Dealers From: Toyota Customer Services

Toyota Consumer Safety Advisory Potential Floor Mat Interference with Accelerator Pedal *******URGENT******

Toyota Motor Sales, USA, Inc. takes public safety very seriously. It believes its vehicles to be among the safest on the road today.

Recent events have prompted Toyota to take a closer look at the potential for an accelerator pedal to get stuck in the full open position due to an unsecured or incompatible driver's floor mat. A stuck open accelerator pedal may result in very high vehicle speeds and make it difficult to stop the vehicle, which could cause a crash, serious injury or death.

Toyota considers this a critical matter and will soon launch a safety campaign on specific Toyota and Lexus vehicles. Throughout the process of developing the details of the action plan, it will advise the National Highway Traffic Safety Administration (NHTSA).

Today, we are releasing the attached Toyota Consumer Safety Advisory to our customers. Until Toyota develops a campaign remedy, we are asking owners of specific Toyota and Lexus models to take out <u>any</u> removable driver's floor mat and NOT replace it with any other floor mat. The following models are affected:

- 2007 2010 Camry
- 2005 2010 Avalon
- 2004 2009 Prius
- 2005 2010 Tacoma
- 2007 2010 Tundra
- 2007 2010 ES350
- 2006 2010 IS250 and IS350

In the event owners choose not to remove their floor mat, Toyota strongly recommends that they ensure that the correct floor mat is being used, that it is properly installed and secured, that it is not flipped over with bottom-side up, and that one floor mat is not stacked over another. Information on proper floor mat installation can be found on http://www.toyota.com and <a href="http://www.toy

If a customer requires your dealership's assistance, please assist them by utilizing the attached instructions and application chart.

- Please direct all customer inquiries to the Toyota Customer Experience Center at 1-800-331-4331 or Lexus Customer Experience Center at 1-800-255-3987.
- If you are a dealership associate and have any questions, please contact your District Service/Parts Manager.
- Due to the nature of this activity, it is imperative that all media contacts (local and national) receive a consistent message. In this regard, *all media contacts* must be directed to Brian Lyons (310) 468-2552, in Toyota Corporate Communications. (Please do not provide these numbers to customers. Dealership associates should contact their Region/PD representative for any questions).

The following Q&A has been provided for your reference.

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Toyota/Lexus Consumer Safety Advisory Q&A

Is this Toyota/Lexus Consumer Safety Advisory a recall? <u>Q1:</u>

This is a Consumer Safety Advisory based on the potential for an accelerator pedal to get A1: stuck in the full open position due to an unsecured or incompatible driver's floor mat on certain Toyota and Lexus vehicles.

Why did Toyota issue the Consumer Safety Advisory? <u>Q2:</u> A2:

Recent events have prompted Toyota to take a closer look at the potential for an accelerator pedal to get stuck in the full open position due to an unsecured or incompatible driver's floor mat. A stuck open accelerator pedal may result in very high vehicle speeds and make it difficult to stop the vehicle which could cause a crash, serious injury or death.

<u>Q3:</u> A3: Was there a specific incident related to the Consumer Advisory?

On August 28th, 2009, California Highway Patrol Officer Mark Saylor and three members of his family tragically lost their lives on a highway near San Diego, California, while driving a 2009 ES350 loaned to them by a local Lexus dealer.

Preliminary information from law enforcement investigators indicates that the ES350 involved in the crash contained a driver's all-weather floor mat from a different model Lexus. If incompatible driver's floor mats are installed in any vehicle, or if the floor mat is not properly secured by the retaining hooks, this could cause it to interfere with the accelerator pedal.

Q3a: Electronic systems, such as drive by wire, have been suggested as a possible culprit in the persistence of sudden unintended acceleration incidents. Is this part of the investigation of the San Diego accident.

A3a: All aspects of the vehicle are being studied, but preliminary indications are that an all weather floor mat not designed for the ES350 was installed at the time of the Saylor crash. We have seen no evidence that electronic engine control systems were the cause.

<u>Q4:</u> Which models and model years are impacted?

A4: Toyota

2007 - 2010 Camry 2005 - 2010 Avalon 2004 - 2009 Prius 2005 – 2010 Tacoma 2007 - 2010 Tundra

Lexus

2007 - 2010 ES350 2006 - 2010 IS250 and IS350

<u>Q4a: How many vehicles are involved?</u>

A4a: We are currently determining the number of vehicles.

Q5: Is Toyota planning another recall for the all-weather floors mats or other components as <u>a result of this Consumer Advisory?</u>

A5: Toyota considers this a critical matter and will soon launch a safety campaign on specific Toyota and Lexus vehicles. Throughout the process of developing the details of the action plan, it will advise the National Highway Traffic Safety Administration (NHTSA).

Until we develop a campaign remedy, we recommend that owners remove *any* driver-side floor mat from the specific models identified and **NOT** replace it with any other floor mat.

Q5a: Why didn't the previous all-weather floor mat recall alleviate this problem?

A5a: The previous floor mat recall was aimed at replacing accessory all weather floor mats with a newly designed one as well as advising users not to place all weather mats on top of any other floor mats. Despite this effort, unsecured or incompatible driver's floor mats can present a hazard and Toyota is exploring remedies that can further reduce the likelihood of an crash that could result from misinstallation.

<u>Q6:</u> What should customers do?

A6: Toyota is committed to finding the right solution for this condition. Until the campaign remedy is developed and customers receive notice from Toyota, we request that customers take out any removable driver's floor mat and NOT replace it with any other floor mat.

<u>Q6a: What if a customer chooses not to remove their floor mat?</u>

A6a: In the event a customer chooses not to remove their floor mat, Toyota strongly recommends that they ensure that the correct floor mat is being used, that it is properly installed and secured, that it is not flipped over with bottom-side up, and that one floor mat is not stacked over another. Information on proper floor mat installation can be found on http://www.toyota.com and http://www.lexus.com.

Q6b: What if a customer requires assistance in checking the floor mat?

A6b: If a customer chooses not to remove their floor mat and requires assistance, they may check with any local Lexus or Toyota dealership's Parts or Service Department to verify the application. Dealers will re-install only those floor mats designed specifically for that model and model year.

<u>Q6c: What if a customer needs retaining hooks (clips)?</u>

A6c: Replacement retaining hooks (clips) for Lexus and Toyota carpeted and all-weather floor mats are available at any Lexus or Toyota dealership. Please check with the dealer for details.

Q7: What if a floor mat is an aftermarket rubberized floor mat?

A7: Driver's floor mat interference is possible in any make or model vehicle with any combination of floor mats. Therefore, consumers need to make sure the floor mats are compatible for their model and model year. Also, they need to be sure they are properly secured using the appropriate retention device (clips). Driver's floor mats should never be stacked. Consumers should never place any floor mat – aftermarket or not – on top of another driver's floor mat. Mats should also not be flipped over with the bottom-side up.

Q8: What if a driver experiences accelerator pedal interference. What should they do?

A8: Should the vehicle continue to accelerate rapidly after releasing the accelerator pedal, this could be an indication of floor mat interference. If this occurs, Toyota recommends the driver take the following actions:

First, if it is possible and safe to do so, pull-back the floor mat and dislodge it from the accelerator pedal; then pull over and stop the vehicle.

If the floor mat cannot be dislodged, then firmly and steadily step on the brake pedal with both feet. Do not pump the brake pedal repeatedly as this will increase the effort required to slow the vehicle. If you are still unable to stop the vehicle, then do the following:

Shift the transmission gear selector to the Neutral (N) position and use the brakes to make a controlled stop at the side of the road and turn off the engine.

If unable to put the vehicle in Neutral, turn the engine OFF. This will not cause loss of steering or braking control, but the power assist to these systems will be lost.

-If the vehicle is equipped with an Engine Start/Stop button, firmly and steadily push the button for at least three seconds to turn off the engine. Do NOT tap the Engine Start/Stop button.

-If the vehicle is equipped with a conventional key-ignition, turn the ignition key to the ACC position to turn off the engine. Do NOT remove the key from the ignition as this will lock the steering wheel.

Q8a: Why does the Engine Start/Stop button require 3 seconds to shut off?

A8a: This is to prevent accidentally shutting off the engine in case the button is bumped or mistaken for another control. The resulting loss of engine power could cause a loss of the power assist to the brakes and steering, and possibly an unsafe situation.

Q9: What if an owner has additional guestions or concerns?

Owners with questions or concerns, are asked to please contact the Toyota Customer Experience Center (1 800 331-4331) or Lexus Customer Assistance Center (1 800 255-3987), or consult the information posted at <u>http://www.toyota.com</u> and <u>http://www.lexus.com</u>.

Toyota and Lexus Carpeted / All-Weather Floor Mat Inspection, Application and Installation Instructions

Read these important Warnings BEFORE installing ANY type of Floor Mat.

A. General Floor Mat Warnings

STOP

- Only install floor mats designed specifically for that model and model year. Check for correct model name and part number on the packaging label to confirm vehicle application.
 - Never install a floor mat if you are uncertain of the model application.
 - o Never install the floor mat upside down or turned over for any reason.
 - o Only install the driver's floor mat in the driver's foot area.
- Always properly secure the driver's floor mat using the retaining hooks (clips) supplied in the bag with the floor mats (in the case of Lexus with the carpet floor mats). Follow the floor mat retention clip installation instruction supplied with the clips. If the mat is properly secured and you have confirmed vehicle applicability, it will not interfere with the accelerator pedal.
 - Never install the front driver's floor mat without all retaining hooks (clips) securing the mat firmly in place.
 - The retaining hooks (clips) are designed to accommodate only one floor mat at a time.
 - Do not install another floor mat(s) on top of an existing driver's floor mat.
- After installation, always check the operation of the accelerator, brake and clutch (if applicable) pedals to assure the floor mat does not interfere with them.
- Carefully read the warning tag attached to the driver's floor mat regarding installation.

B. Floor Mat Inspection Instructions and Application Information

- Before placing a floor mat in a vehicle be familiar with the procedure outlined below.
 - o Identify the correct driver's floor mat for the specific vehicle application.
 - Correctly install the driver's floor mat.
- Regularly verify the correct floor mat is securely installed in the appropriate model using the retaining hooks (clips).

NOTE: Use the Application Information Chart provided or the Accessory Parts Catalog to verify mat-to-vehicle application.



Warning: Do not stack the floor mats in any vehicle. The retaining hooks (clips) are designed to accommodate only one floor mat at a time.

- - Check the following pedal operation (fully depress the pedal) to assure the floor mat does not interfere with it. Make sure the vehicle is turned off and in the "Park" position when testing:
 - Accelerator Pedal
 - Brake Pedal
 - Clutch Pedal (if equipped)
 - 3. Verify the driver's floor mat involved in SSC 70F & 7LB has been removed from your vehicle

DO NOT USE THESE MATS

 SSC 70F Part Number:
 SSC 7LB Part Number:

 PT908-32070-02 (Blk)
 PT908-33070-02 OR PT908-33071-02 (Blk)

 PT908-32070-14 (Brn)
 PT908-33070-11 OR PT908-33071-11 (Gr)

 PT908-33070-14 OR PT908-33071-14 (Brn)
 PT908-33070-14 OR PT908-33071-14 (Brn)

Toyota and Lexus Carpeted / All Weather Floor Mat Inspection, Application and Installation Instructions

Toyota Ali Weather Floor Mats (Sorted By Part Number)

Parl Number Prive Do not use these floor mats.* Hydroxy Edu Tacoma - Front Tundra - Reg / Access Cab (Front) | x Tecony - Rear Rav 4 Rav 4 Avalon Tacoma - Pauer Tundre - Reg Cab Sienne - 7 5 5 pase COME - SE DOI CH Sierrou - 7 & 3 peas Tundra - Double Cab fundra - Rag Cab Hohlander Land Cruter Netty - 2WD Tecoms - Prost 4 ffunner **K** Parv 4 VD (w haans
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Printed September 29, 2009

ETOYOTA

Toyota All Weather Floor Mat Quick Reference Chart (Sorted By Model)

Printed Saptember 29, 2009

 Model Year
 Mail Description

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Robin LeFevre Lexus Customer Service September 29, 2009 Approved By: Al Smith

To: All Lexus Dealers From: Lexus Customer Services

Lexus/Toyota Consumer Safety Advisory Potential Floor Mat Interference with Accelerator Pedal ******URGENT*****

Toyota Motor Sales, USA, Inc. takes public safety very seriously. We believe our vehicles to be among the safest on the road today.

Recent events have prompted Lexus and Toyota to take a closer look at the potential for an accelerator pedal to get stuck in the full open position due to an unsecured or incompatible driver's floor mat. A stuck open accelerator pedal may result in very high vehicle speeds and make it difficult to stop the vehicle, which could cause a crash, serious injury or death.

Lexus considers this a critical matter and will soon launch a safety campaign on specific Lexus and Toyota vehicles. Throughout the process of developing the details of the action plan, it will advise the National Highway Traffic Safety Administration (NHTSA).

Today, we are releasing a Consumer Safety Advisory to our customers. Until Lexus/Toyota develops a campaign remedy, we are asking owners of specific Lexus and Toyota models to take out <u>any</u> removable driver's floor mat and NOT replace it with any other floor mat. The following models are affected:

- 2007 2010 ES350
- 2006 2010 IS250 and IS350
- 2007 2010 Camry
- 2005 2010 Avalon
- 2004 2009 Prius
- 2005 2010 Tacoma
- 2007 2010 Tundra

In the event owners choose not to remove their floor mat, Lexus strongly recommends that they ensure that the correct floor mat is being used, that it is properly installed and secured, that it is not flipped over with bottom-side up, and that one floor mat is not stacked over another. Information on proper floor mat installation can be found on http://www.lexus.com.

If a customer requires your dealership's assistance, please assist them by utilizing the attached instructions and application chart.

- Please direct all customer inquiries to the Lexus Customer Assistance Center at 1-800-255-3987.
- If you are a dealership associate and have any questions, please contact your District Service/Parts Manager.
- Due to the nature of this activity, it is imperative that all media contacts (local and national) receive a consistent
 message. In this regard, *all media contacts* must be directed to Brian Lyons (310) 468-2552, in Toyota
 Corporate Communications. (Please do not provide these numbers to customers. Dealership associates should
 contact their Area representative for any questions).

The following Q&A has been provided for your reference.

Lexus Consumer Safety Advisory Q&A

Q1: Is this Lexus Consumer Safety Advisory a recall?

A1: This is a Consumer Safety Advisory based on the potential for an accelerator pedal to get stuck in the full open position due to an unsecured or incompatible driver's floor mat on certain Lexus and Toyota vehicles.

Q2: Why did Lexus issue the Consumer Safety Advisory?

A2: Recent events have prompted Lexus to take a closer look at the potential for an accelerator pedal to get stuck in the full open position due to an unsecured or incompatible driver's floor mat. A stuck open accelerator pedal may result in very high vehicle speeds and make it difficult to stop the vehicle which could cause a crash, serious injury or death.

Q3: Was there a specific incident related to the Consumer Advisory?

A3: On August 28th, 2009, California Highway Patrol Officer Mark Saylor and three members of his family tragically lost their lives on a highway near San Diego, California, while driving a 2009 ES350 loaned to them by a local Lexus dealer.

Preliminary information from law enforcement investigators indicates that the ES350 involved in the crash contained a driver's all-weather floor mat from a different model Lexus. If incompatible driver's floor mats are installed in any vehicle, or if the floor mat is not properly secured by the retaining hooks, this could cause it to interfere with the accelerator pedal.

<u>Q3a: Electronic systems, such as drive by wire, have been suggested as a possible</u> <u>culprit in the persistence of sudden unintended acceleration incidents. Is this</u> <u>part of the investigation of the San Diego accident.</u>

A3a: All aspects of the vehicle are being studied, but preliminary indications are that an all weather floor mat not designed for the ES350 was installed at the time of the Saylor crash. We have seen no evidence that electronic engine control systems were the cause.

Q4: Which models and model years are impacted?

A4: Lexus

2007 – 2010 ES350 2006 – 2010 IS250 and IS350

Toyota

2007 – 2010 Camry 2005 – 2010 Avalon 2004 – 2009 Prius 2005 – 2010 Tacoma 2007 – 2010 Tundra

Q4a: How many vehicles are involved?

A4a: We are currently determining the number of vehicles.

<u>Q5:</u> Is Lexus planning another recall for the all-weather floors mats or other components as a result of this Consumer Advisory?

A5: Lexus considers this a critical matter and will soon launch a safety campaign on specific Lexus and Toyota vehicles. Throughout the process of developing the details of the action plan, it will advise the National Highway Traffic Safety Administration (NHTSA).

Until we develop a campaign remedy, we recommend that owners remove *any* driver-side floor mat from the specific models identified and **NOT** replace it with any other floor mat.

Q5a: Why didn't the previous all-weather floor mat recall alleviate this problem?

A5a: The previous floor mat recall was aimed at replacing accessory all weather floor mats with a newly designed one as well as advising users not to place all weather mats on top of any other floor mats. Despite this effort, unsecured or incompatible driver's floor mats can present a hazard and Lexus/Toyota is exploring remedies that can further reduce the likelihood of an crash that could result from mis-installation.

Q6: What should customers do?

A6: Lexus/Toyota is committed to finding the right solution for this condition. Until the campaign remedy is developed and customers receive notice from Lexus, we request that customers take out any removable driver's floor mat and NOT replace it with any other floor mat.

Q6a: What if a customer chooses not to remove their floor mat?

A6a: In the event a customer chooses not to remove their floor mat, Lexus strongly recommends that they ensure that the correct floor mat is being used, that it is properly installed and secured, that it is not flipped over with bottom-side up, and that one floor mat is not stacked over another. Information on proper floor mat installation can be found on http://www.lexus.com.

Q6b: What if a customer requires assistance in checking the floor mat?

A6b: If a customer chooses not to remove their floor mat and requires assistance, they may check with any local Lexus dealership's Parts or Service Department to verify the application. Dealers will re-install only those floor mats designed specifically for that model and model year.

<u>Q6c: What if a customer needs retaining hooks (clips)?</u>

A6c: Replacement retaining hooks (clips) for Lexus carpeted and all-weather floor mats are available at any Lexus dealership. Please check with the dealer for details.

Q7: What if a floor mat is an aftermarket rubberized floor mat?

A7: Driver's floor mat interference is possible in any make or model vehicle with any combination of floor mats. Therefore, consumers need to make sure the floor mats are compatible for their model and model year. Also, they need to be sure they are properly secured using the appropriate retention device (clips). Driver's floor mats should never be stacked. Consumers should never place any floor mat – aftermarket or not -- on top of another driver's floor mat. Mats should also not be flipped over with the bottom-side up.

Q8: What if a driver experiences accelerator pedal interference. What should they do?

A8: Should the vehicle continue to accelerate rapidly after releasing the accelerator pedal, this could be an indication of floor mat interference. If this occurs, Lexus recommends the driver take the following actions:

First, if it is possible and safe to do so; pull-back the floor mat and dislodge it from the accelerator pedal; then pull over and stop the vehicle.

If the floor mat cannot be dislodged, then firmly and steadily step on the brake pedal with both feet. Do not pump the brake pedal repeatedly as this will increase the effort required to slow the vehicle. If you are still unable to stop the vehicle, then do the following:

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If unable to put the vehicle in Neutral, turn the engine OFF. This will not cause loss of steering or braking control, but the power assist to these systems will be lost.

-If the vehicle is equipped with an Engine Start/Stop button, firmly and steadily push the button for at least three seconds to turn off the engine. Do NOT tap the Engine Start/Stop button.

-If the vehicle is equipped with a conventional key-ignition, turn the ignition key to the ACC position to turn off the engine. Do NOT remove the key from the ignition as this will lock the steering wheel.

Q8a: Why does the Engine Start/Stop button require 3 seconds to shut off?

A8a: This is to prevent accidentally shutting off the engine in case the button is bumped or mistaken for another control. The resulting loss of engine power could cause a loss of the power assist to the brakes and steering, and possibly an unsafe situation.

<u>Q9: What if an owner has additional questions or concerns?</u>

Owners with questions or concerns, are asked to please contact the Lexus Customer Assistance Center (1 800 255-3987), or consult the information posted at <u>http://www.lexus.com</u>.

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Printed September 29, 2009

Lexus All Weather Floor Mats /Sorted Bv Model)

Modai			ł							
	Part Number	2004	2005	2006 実	2007	2008	2009	2010	Color	Piece Set No.
ES 330	PT908-33050-02		×	×				1	Black	4 pc set
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ES 350	PT908-33072-02		Γİ	Π	×	×	×	×	Black	4 pc set
ES 350	PT908-33072-11	1		T	×	×	×	×	Gray	4 pc set
ES 350 (Front Mats)	PT908-3307F-02				××	××	××	××	Black	4 pc set
ES 350 (Front Mats)	PT908-3307F-11		Π		×	×	×	×	Gray	1 pc set
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GX 470 w/ RSE	PT908-600GX-14	-		××	< ×	××	××	1	Brown	4 pc set
GX 470 w/o RSE	PT908-606GX-14			×	×	×	×		Brown	4 pc set
IS 300 - Sport Cross (Front)	PT206-5303F-03	×	×	T		T	T	×	Grav Grav	2 pc set
IS 300 - Sport Cross (Rear)	PT206-5303B-03	×	×			Π			Gray	2 pc set
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IS 250/350 Convertible	PT908-50090-02	Γ	T	T	╞	1	T	×	Black	4 pc set
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LS 430	PT908-50050-11		× ،	××	T	T	T		Gray	4 pc set
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LS 600h	PT908-LSH80-02	T	Γ	T	Τ	(×	×	(×	Black	4 pc set
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LX 570 - 37 Row LX 570 - 37 Row RX 330 RX 330/30 RX 330/350 RX 330/350 RX 330/350 RX 330/350 RX 330/350	PT206-6003B-16 PT308-60050-02 PT308-60050-14 PT308-60051-02 PT308-60050-14 PT308-60080-02 PT308-60086-02 PT308-48060-02 PT308-48060-02 PT308-48060-02 PT308-48060-02 PT308-48060-02 PT308-48060-02 PT308-48060-02	××	××	× × ×	×××	×××	× × >	×	Black Brown Black Black	4 pc set 4 pc set 4 pc set 4 pc set

Printed September 29, 2009



Lexus All Weather Floor Mats (Sorted By Part Number)

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3	UW2 U04/06/06/06/06/	1	1	×	×	×	×	×	RIGC	4 pc set
	GS 450H				×	×	×	×	Black	4 pc set
ð	350/430/460 2WD			×	×	×	×	×	Brown	4 pc set
	GS 450H				×	×	×	×	Brown	4 pc set
	GS 350 AWD			×	×	×	×	×	Black	4 DC set
	GS 350 AWD		-	×	×	×	×	×	Brown	4 DC Set
	ES 330		×	×		t			Black	4 DC Set
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ľ	t	t	t	t	1	F	t	Black	4 nr set	DT708-24090-0
1	1	1	1	1	1	1	1			

Lexus Carpet Floor Mats (Sorted By Part Number)

ption	Piece Set No	4 pc set	4 pc set	4 pc set	4 pc set	4 pc 381		4 nc set	4 pc set	4 pc set	4 Pcs set	4 Pcs set	4 pc. set	4 pc. set	4 pc kit	4 pc set	4 00 561	4 DC 86	4 pc set	4 pc set	4 00 56	* 25 8	o bc sex	200			2 PIC 881		4 pc set	4 pc set	4 pc ser	4 00 561	4 70 cot	4 nor cet	4 DC set	4 DC set	4 pc set	4 DC Set	4 pc set	4 pc set	4 pc set	4 pc set	4 pc set	4 pc set	4 PC Set	4 PC Set				4 DC Set	4 pc set	4 pc set	4 pc set	4 pc set	4 pc set	4 pc set	4 nr set	4 DC Set	4 00 5.64	4 pc set	4 pc set	4 pc set	4 DC Set	4 DC Set	4 pc set	4 DC Set	4 pc set	4 pc set	4 pc set	4 pc set	4 pc set	4 pc set	A no eat							
Mat Descri	Color	Black	Charcoal	Nory	Black	right Charcoal	APID	Black	Gray	Cashmere	Cashmere	Light Gray	Brown	Charcoal	. Black	lvov	Light Grav	Black	Ivory	Light Gray	Black	Gray		INOIY	Light Gray		Diark prown	Centre	Gray	A INA	Gray	Dord Device	Diact	Diace		BIBCK W/ SADDIE	DIRICK	Dinak wi Coddlo	Front and the second	Red	Camel	Camel	Black	Carnel	Black	Vov	Dark Gray	Black	wory	Dark Gray	Cashmere	Casnimere	Ash	ASII Eboou	Fhony	Cashmere	Ash	Ebony	Black	Brown	Ebony w/ Red Logo	COONY W/ HIGO LOGO	Round	Black	Black	Charcoal	lvor	Grav	Black	Brown	Cashmere	Grav	Black	Brown	Cashmere	Gray	Black	Brown	· · · · · · · · · · · · · · · · · · ·	Lashmere
	102						Ι				×	×	×	×	×								-			ŀ	,	Ţ	×	,	,	,	4	<	T	Τ	T			Γ	Γ	×	Γ		l				ĺ		:	×	١,	κ,	<	(l	×	×	×		1	</td <td>×</td> <td>T</td> <td>ľ</td> <td></td> <td></td> <td>×</td> <td>×</td> <td>ſ</td> <td>t</td> <td>×</td> <td>×</td> <td>Π</td> <td></td> <td>×</td> <td>×</td> <td></td> <td></td>	×	T	ľ			×	×	ſ	t	×	×	Π		×	×		
	500			1	╈		t	t			×	×	×	×	×	×	×	×	-	Π		f	×,		×	×	t	ţ		4,	ς,	4,	4,	; ;	×	+	t	t	t	t	t	×	×	t	×	t	-	•		╞	×	×,	,	ς,	,	ł×	×	×	×	×	×	×,	; >	×		┝	┢	×	×	╞	×	×	×	×	×	×	×	×	ł	×
	00Z						T	ł								×	×	×	×	×	×	T		T	T	T	Ţ	ŀ	<)	4	،	<	,	< :	×	T	T	T	T	t	t	×	×	×	Γ	h	-		1	1,	×	×	1	* >	4	۰,	×	×	×		1	†,	Ŧ	×	ł		┢	×	×	İ×	×	×	×	×	×	×	×	×	ł	×
	500				Τ			Ľ								×	×	×	×	×	×			Ι				Τ	Ι		Ι	I	,	< '	×	×	< >	< '	<	Γ	Γ	×	×		Γ	Γ				Ţ	×	×	4	× ,	•	۰×	×	×	×		1	Ţ,	1	×	t	Г	F	×	×	×	×	×	×	×	×	×	×	×		×
	500	×	×	×	×	×	()	×٧	×	×						×	×	×	×	×	×							Ι	I		Τ	Τ	,	<	×	×	× ›	<)	¢		ľ×	×	Γ	Γ		Γ			Τ	7,	×	×	Τ,	×	~ >	< ×	×	×			1	1,	{	×		T	Γ	T	Γ	T	T	t	T		Π			П		
4	500	×	×	×	×	×	4	4								×	×	×				×				T	T	I			l		,	<	×	×	<	,	¢			Γ								Τ	Τ	Τ	Τ		Τ	Γ		Π					Ι		×	×	×	ſ	Γ	Γ								Π	Ì	
[500	×	×	×	×	×	Ι									×	×	×				Τ		T		T	T	T	T	T	T	Ţ	ļ	4		×,	<i>,</i>	,	< >	,	Γ	ľ				×	×	×	×	×	T		t		T	T	Γ	Π				T	T		×	×	ľ×	t	ſ	l		T	t					Γ		_
		ES 300/330	ES 300/330	ES 300/330	ES 300/330 (sport design)		EC 200220	ES 300/330	ES 300/330	ES 300/330	ES 350	ES 350	ES 350	ES 350	ES 350	RX 330/350	RX 330/350	RX 330/350	RX 400h	RX 400h	RX 400h	RX 330					DV3ED/4EAH		1 X 570	1 2 20	1 2 570	1 X570	SC 200/420	SC 200(430	SC 300430	SC 300430	0C 130	5C 430	SC 430	SC 430	SC 430	SC 430	SC 430	SC 430	SC 430	GX 470 w/o RSE	GX 470 W/o RSE	GS 300/400/430	GX 470 w/ RSE	GX 4/U W/ KSE	60 300400 ZWD	GS 350/460 3040	20 20000 200	GS 350/460 2000	GS 450H	GS 350/460 AWD	GS 350/460 AWD	GS 350/460 AWD	GS 350/460 2WD	GS350, GS450h, GS460 2WD	GS350, GS450h, GS460 2WD	GOUDIN GONDIN GONDINA	GS350 AMD	GS350 AWD	GS 300/400	GS 300/400	GS 300/400	LS 460	LS 460	LS 460	LS 460	LS 460	LS 460	LS 460	LS 460	LS 460/600h	LS 460/600h	LS 460/600h		LS 460/600h
		PT206-33034-02	PT208-33034-12	PT206-33034-20	P1205-33044-02	DT200 33054 14	DT208 32054 30	PT208-33060-02	PT206-33060-11	PT206-33060-30	PT206-33070-10	PT206-33070-11	PT206-33090-05	PT206-33090-15	PT206-33090-25	PT206-48040-10	PT206-48040-11	PT206-48040-12	PT206-48050-10	PT206-48050-11	PT206-48050-12	P1205-48060-11		DT 200 40000 DD	017005 40000 0F	CI-2004-0021-0	DTD/06_48100-03	PT205 X NB6-04	DT706L Y086 10	PT2/02 X088 01	DTDRL V088 10	PT206 X006 07	PT208-24010-02	DTDRS 24040 D	1200-24010-20	DT706 24030 10-34	DT208-24030-20	PTONE 2202020	PT208-24044-20	PT208-24055-03	PT208-24060-03	PT208-24060-14	PT208-24070-02	PT208-24080-14	T208-24090-02	PT208-30040-10	PT208-30040-11	PT208-30041-01	P1208-30047-10	71208-30047-11	71200-30050-30	0T206-30050-31	0T208-20030-31	01200-30050-32	7208-30050-32	PT208-30058-30	77208-30058-31	PT208-30058-32	PT208-30060-02	T208-30090-01	71206-30091-32	200-20034-32	7208-30098-01	T208-30099-32	T208-30980-01	1208-30980-03	TZ08-30980-08	T208-50071-01	1208-50071-02	T208-50071-04	T208-50071-10	1208-50073-01	7208-50073-02	7208-50073-04	7208-50073-10	PT208-50075-01	7208-50075-02	PT208-50075-04		7208-50075-10

4 pc set	Black	×		Ц					HS 250h	PT926-75004-20
4 pc set	Dark Brown	×							HS 250h	PT926-75004-04
4 00 set	Cashmere	1	×ŀ	×	Ι				LS 460/600h	PT919-50083-10
4 pc set	Brown	×	×Þ	×Ì					LS 460/600h	PT919-50083-04
	Black	ŀ	ψ	ф	Τ				L3 460/6000	PT919-50083-02
1	Contractor	ł	φ	φ	ŀ	T			1 \$ 450,5005	PT010_50081_01
3 3	Cashmera	ŀ	Ŷ	÷	÷	1	ł		LS 480/800h	PT919-50075-10
3 2	Rimun	4	⋬	4	ψ				LS 480/800h	PT919-50075-04
1 1	Riark	<	4	ł	-				LS 48D/800h	PT919-50075-02
1 nc	Grav	×	< }		×	1			LS 460/600h	PT919-50075-01
4 10 500	Cashmere	,	× '	×ŀ	×	Ι			LS 460	PT919-50073-10
4 no set	Brown	<	<	<	×				LS 460	PT919-50073-04
4 DC Set	Black	×	×ŀ	×	×				LS 460	PT919-50073-02
4 7 64	Grav		4	1	<				I S 480	PT919-50073-01
4 nc set	Cashmere	ľ	×	×	×				LS 460	PT919-50071-10
4 00 set	Brown	-	4	×	×				LS 460	PT919-50071-04
4 DC set	Black	×	×ŀ	×	×				LS 460	PT919-50071-02
4 DC Set	Grav	×	×	×	×				LS 460	PT919-50071-01
4 00 841	Black	×	_			T			RX350/450h	PT919-48100-20
4 DC saf	Grav	×	_						RX350/450h	PT919-48100-12
4 DC set	VOV	×	┥			T			RX350/450h	PT919-48100-01
4 pc set	Ash			_		×	×	×	LS 430	PT548-50040-11
4 pc set	Cashmere					×	×	×	LS 430	PT548-50040-10
4 nc set	Taupe		1		Ι	-	×	×	LS 430	PT548-50031-14
4 DC set	Bordeaux							×	LS 430	PT548-50031-13
4 DC set	Black					×	×	×	LS 430	PT548-50031-02
4 75 56	Taupe			۱		×	×	×	LS 430	PT548-50030-14
4 pc set	Light Charooal							×	LS 430	PT548-50030-11
4 pc set	VOV						×	×	LS 430	PT548-50030-10
4 pc set	Black					×	×	×	LS 430	PT548-50030-02
3 pc set	Gray							×	RX 300	PT548-48030-11
3 pc set	Ivory							×	RX 300	PT548-48030-10
3 pc set	Black							×	RX 300	PT548-48030-02
4 Pcs set	Charcoal	×	×						ES 350	PT548-33090-12
4 Pcs set	Brown	×	×						ES 350	PT548-33090-01 [
4 pc set	Light Gray	×	×	×		Γ			ES 350	PT548-33080-11
4 pc set	Cashmere	×	×	×					ES 350	PT548-33080-10
4 pc set	Black	×	×	×		F		ŀ	ES 350	PT548-33080-02
4 pc set	Light Gray	×	×	×	×				ES 350	PT548-33070-11
4 pc set	Cashmere	×	×	×	×				ES 350	PT548-33070-10
4 pc set	Biack	×	×	×	×	t			ES 350	P1548-33070-02
4 po set	Black	×			Γ	Γ			HS 250h	P1208-75005-20
4 pc set	Dark Brown	×			Г	T			HS 250h	PT208-75005-04
4 pc set	Black		×	×	Γ	Ī			GX 470 - Sport (w/ RSE)	PT208-60081-02
4 pc set	Black		×	×	t	T			GX 470 - Sport (w/o RSE)	PT208-60080-02
4 pc set	Black w/ Gray				×				LX 470	PT208-60071-12
4 pc set	Dark Gray		×	×	×	×	×	×	GX 470 W/ RSE	PT208-60037-11
4 pc set	lvory		×	×	×	×	×	×	GX 470 w/ RSE	PT208-60037-10
3 po set	Charcoal		L		ķ	×	×	×	LX 470	PT208-60031-11
3 pc set	tvory				×	×	×	×	LX 470	PT208-60031-10
4 pc set	Dark Gray		×	×	×	×	×	×	GX 470 w/o RSE	PT208-60030-11
4 pc set	Ivory		×	×	×	×	×	×	GX 470 w/o RSE	PT208-60030-10
4 pc set	Black	×	×	×					IS 250/350 F-Sport 4WD	PT208-53098-02
4 pc set	Black	×	×	×		F			IS 250/350 F-Sport 2WD	PT208-53097-02
4 pc set	Blue	×							IS 250/350 Convertible	PT208-53093-06
4 pc set	τ Έ	×	×						IS 250/350 4WD	PT208-53088-01
4 pc set	Black	×	×	×					IS - F (V8)	PT208-53087-02
4 pc set	Eco	×	×			1			IS 250/350 2WD	PT208-53087-01
4 pc set	Cashmene	:		×	×1	×1			IS 250/350 4WD	PT208-53068-30
4 DC Set	Black	×	×	×	×	×			IS 250/350 4WD	PT208-53068-02
4 00.544	Cashmere	į		-	×1			1	IS 250/350 2WD	PT208-53067-30
4 DC Set	Black	×	×	×	×	×			(S 250/350 2WD	PT208-53067-02
4 pc set	Cashmere		Τ		1	×			IS 250/350 4WD	PT208-53062-30
4 00 56	Black			1	1	×			IS 250/350 4WD	PT208-53062-02
4 pc set	Cashmere					×			IS 250/350 2WD	PT208-53060-30
4 pc set	Black	Τ			1	×			IS 250/350 2WD	PT208-53060-02
4 pc set	Black				1	-		×	IS 300 - Sport Cross	PT208-53048-02
4 pc set	Gray							×	IS 300 - Sport Cross	PT208-53048-01
4 pc set	Black				-	-		×	IS 300 - Sport Cross	PT208-53036-02
4 pc set	Gray				-			×	IS 300 - Sport Cross	PT208-53036-01
4 pc set	Ivory						×	×	IS 300 - Sport Cross	PT208-53033-10
4 pc set	Black	_ · · · ·					×	×	IS 300 - Sport Cross	PT208-53033-02
4 pc set	Ivory						×	×	IS 300 - Sport Cross	PT208-53020-10
4 pc set	Black		1	1	1	1	×	×	IS 300 - Sport Cross	PT208-53020-02
4 00 561	Cashmere	ļ	×,	×	1	+	Τ		LS 480/800h	PT208-50083-10
4 77 691	Rmun	-	~	朩	╈	╈	Τ	t	LS 460/800h	PT208-50083-04
1 Am est	T Riserk	~	~		1	4	1	1	LS 480/800h	FT208-50083-02

Toyota Carpet Floor Mats (Sorted By Model)

					ľ	t	ł	t	Mat Des	cription	
Mode	2003	5004	5002	5006	2002	800S	600Z	0105	Color	Piece Set No.	Part Number
4 Runner	×	×	×	×	×	×	×	T	Taupe	4 pc set	PT208-89030-04
4 Runner	×	×	Ľ	×	×	×	×		Stone	4 pc set	PT208-89030-21
4 Runner								×	Black	4 pc set	PT208-89004-20
Avalon	×	×	×			1	+	T	Vov.	4 pc set	PT208-07000-08
Avalon	×,	×ŀ	×ŀ	4		t	╈	T	Nory	4 pc set	PT208-07040-10
Avalon	<,	÷	`			T	t		Tauro	4 PC 201	D1708-07000-06
Avalon	×	×	• ×	L		t	┢	T	Taupe	4 DC set	PT208-07040-04
Avalon	×	×	×				┢╴	Γ	Taupe	4 pc set	PT208-07000-15
Avalon	×	×	×			Η	Η	Π	Stone	4 pc set	PT208-07000-23
Avalon	×	×	×		ĺ	1	†	T	Stone	4 pc set	PT208-07040-21
Avaion	×	×	×	'	,	1,	۰,	1,	stone	4 pc set	PT208-07000-23
Avalor			ľ	4	<	</td <td>\$</td> <td>,</td> <td>Granhita</td> <td>A no cet</td> <td>DTEAS 07060-00</td>	\$,	Granhita	A no cet	DTEAS 07060-00
Avalon	T		· >	< >	< >	< >	<	< >	l inht Grav	A no cet	DTSAR-07060-11
Avalon	1		• ×	×	×	۰×	ł.	×	Dark Charcoal	4 DC Set	PT548-07050-12
Avalon					×	×	×	×	Vov	4 pc set	PT548-07070-10
Avalon					×	×	×	×	Graphite	4 pc set	PT548-07070-22
Avaion					×	×	×	×	Light Gray	4 pc set	PT548-07070-11
Avaion					×	×	×	×	Dark Charcoal	4 pc set	PT548-07070-12
Avalon							×	×	lvory	4 pc set	PT206-07090-02
Avalon							×	×	Light Gray	4 pc set	PT206-07090-17
Avalon						1	×	×	Dark Charcoal	4 pc set	PT206-07090-18
Avalon						1	×	×	Graphite	4 pc set	PT206-07090-16
Camry	×	×	×	×		1	1	1	Gray	4 pc set	PT208-32020-01
Camry	×	×	×	×		7	┥	1	Stone	4 pc set	PT208-32020-21
Camry	×	×	×	×		7	+	T	Taupe	4 pc set	PT208-32020-04
Camp - SC		×	×		Ī	-	╋	1	Gray	4 pc set	PT208-32041-01
Camo - VE		×	×		, İ	1			laupe	4 pc set	PT208-32041-04
Camry / Camry Hybrid					×	×	×	×	Ash	4 pc set	PT206-32060-11
Campy Campy Hybro					×	×	×	×	Dark Charcoal	4 pc set	PT206-32060-12
				1	×	×	×	Ţ	Disdue	4 pc 8et	F1206-32060-14
	Ì	T			×	1	1		Discue	4 pc set	P1206-32078-40
Campy Campy History	T	I			ľ	t	╈	×,	DIOWI	4 pc set	P1206-3210045
	,	>	,	Ļ	T	T	t	<	leoment.	1 20 201	DT0/05 00000 14
Comite - Short Edition /w/ Rear	ſ	4	ſ	1		t	╈	T		100 77 4	11-00002-00021-1
Heater)	×								Gray	4 pc set	PT206-02030-03
Corolla (w/ Rear Heater)	×			L			-		Light Gray	4 pc set	PT206-02030-11
Corolla (w/ Rear Heater)	×			Ц		Π	H		Oak	4 pc set	PT206-02030-16
Corolia - Sport Edition (w/o Rear	×								Gray	4 pc set	PT206-02031-03
Condia (w/o Beer Heater)	Ţ,					╈	╈	T	1 to be Come	4 20 001	DTDAE 00094 44
Corolla (w/o Rear Heater)	,	ļ				╈	+	1	Light Gray	4 pc set	DT206-02031-16
Comla - Short Edition (w/ Rear	ł					t	╈	t	Can	4 PC 201	BI-100000071
Heater)	×	×	×	×	×	×			Gray	4 pc set	PT206-02040-03
Corolla (w/ Rear Heater)	×	×	×	×	×	×	h		Light Gray	4 pc set	PT206-02040-11
Corolla (w/ Rear Heater)	×	×	×	×	×	×	H	Ħ	Oak	4 pc set	PT206-02040-16
Corolla - Sport Edition (w/o Rear	×	×	×	×	×	×	•		Grav	4 pc set	PT206-02041-03
Corrella (w/o Rear Heater)	ļ	,	ŀ	ľ	ŀ	١,	╋	↑	Linht Grav	1 20 04	DT206.02041 11
Corolla (w/o Rear Heater)	•	,	<	Ŷ	•	1,	t	t	Cak	4 20 001	DT206 02041 1
Comita (w/ Rear Heater)	(x	۲,	<	ł>	(۲,	┢	t	Gen	4 77 6.04	PT206.0206.03
Corolla (w/o Rear Heater)	(×	×	×	×	×	×	╞	T	Grav	4 bc set	PT206-02051-01
Corolta						F	×		Dark Charcoal	4 pc set	PT206-02090-12
Corolla							×		Dark Charcoal	4 pc set	PT206-02091-12
Corolla	╏				1	+	×		Bisque	4 pc set	PT206-02090-41
Corolla	+	1			t	┥	×	1	Bisque	4 pc set	PT206-02091-41
Corrolla	T	Ι			Ť	t	×	Ţ	Dati Channel	4 pc set	P1205-02083-41
Condia	t	Τ			t	┢		,	Dark Charchal	4 TC Ket	PT205-02092-12
Corolta		Γ				┢	×	×	Bisque	4 pc set	PT206-02092-41
Corolta			ĺ		t	┢╸	×	×	Bisque	4 pc set	PT206-02093-41
Corolta					F	H	$\left \right $	×	Brown	4 pc set	PT206-02102-45
Corolia							Η	×	Brown	4 pc set	PT206-02103-45
Echo (2 door w/ rear heater)	×	×			1	+	1		Dark Gray	4 pc set	PT208-52030-11
Echo (2 door w/o rear heater)	×	×	×				-		Dark Gray	4 pc set	PT208-52033-11
Echo (2 door w/ rear heater)	×	×	×		1				Beige	4 pc set	PT208-52030-44
Echo (2 door w/o rear heater)	×	×	×			Ì	-		Beige	4 pc set	PT208-52033-44
Echo (4 door w/ rear heater)	×	×	×		1		+		Dark Gray	4 pc set	PT208-52031-11
Echo (4 door w/o rear heater)	×	×	×		1	┥	┥	1	Dark Gray	4 pc set	PT208-52034-11
Echo (4 door w/ rear heater)	×	×	×		1	1	+		Beige	4 pc set	PT208-52031-44
Echo (4 door w/o rear heater)	×	×	×		1	╉	┽	-†	Beige	4 pc set	PT208-52034-44
El Casicar	t	T		Ι	×	×	:	×	Charcoal	47.00	F1040-04010
Highlander	×	T			t	+		t	Grav	4 DC Set	PT208-48010-01
Highlander	×	Π		Π	Н	Н	Н	Η	lvory	4 pc set	PT208-48010-10
		ĺ		ļ							

Highlander (w/o 3rd row)		×	×	×	Ľ		Π	Π	Ash	4 pc set	PT208-48042-31	
Highlander (w/ 3rd row)		×	×	×			Т		Ash	5 pc set	P1208-48041-31	
Highlander (w/ 3rd row)		, ×	×	* *			Τ		AinA	4 pc set	PT208-48041-10	
Highlander - Hybrid (w/ 3rd row)			×	×				Π	Ivory	4 pc set	PT208-48061-10	
Highlander - Hybrid (w/ 3rd row)			×	×					Ash	4 pc set	PT208-48061-31	
Highlander (w/o 3rd row)				×	×		Т	T	vory	4 pc set	PT548-48060-10	
Highlander (w/o old row)				× >	×		Τ	T	ASI MON	4 PC SCI	PT548-48080-51	
Highlander (w/ 3rd row)			ŀ	×	×		Γ	Ι	Ash	5 pc set	PT548-48063-31	
Hightander - Hybrid (w/ 3rd row)		ŀ		×	×			Π	Ivary	5 pc set	PT548-48062-10	
Highlander - Hybrid (w/ 3rd row)				×	×				Ash	5 pc set	PT548-48062-31	
Highlander - Hybrid (w/o 3rd row)				×	×		Τ		lvory	4 pc set	PT548-48074-10	
rigneroor - riyona (wo sia row) Hichlander - Gas	Ţ			×	×	ŀ	ŀ	>	Riack	A DC Set	P1546-460/4-31	
Highlander - Gas	ľ	Γ				٩×	٩×	٩×	Ash	3 DC set	PT919-48080-22	
Highlander - Gas						×	×	×	Sand Beige	3 pc set	PT919-48080-41	
Highlander - Hybrid				Ц		×	×	×	Ash	3 pc set	PT919-48081-22	
Highlander - Hybrid		Ī				×	×	×	Sand Beige	3 pc set	PT919-48081-41	
Highlander - Gas & Hybrid						×	×	×	Black	8	PT919-48082-11	
Highlander - Gas & Hybrid Highlander - Gas & Hybrid						××	××	×	Sand Beige	8 8	PT919-48082-22	
Land Cruiser	×	×	×	×	×	4	4	ł	ADV	3 pc set	PT206-60032-10	
Land Cruiser	×	×	×	×	×				Dark Stone	3 pc set	PT206-60032-11	
Land Cruiser					\square	×	×	×	Gray	3 pc set	PT206-60080-01	
						×	×	×,	Prote	3 pc set	P1206-60080-10	
Land Cruiser Menty - AND (w/ hoster)	,			1				×	Gravi	d pc set	P1206-60100-45	
Matrix - 2WD (w/ heater)	×						Γ	Γ	Gray	4 DC Set	PT206-12031-03	
Matrix - 2WD (w/o heater)	×		L						Gray	4 pc set	PT206-12032-03	
Matrix - AWD (w/ Rear Hester)	×	×	×	×	Ц			Π	Gray	4 pc set	PT206-12040-03	
Matrix - 2MD (w/ Rear Heater)	×	×	×	×	×	×			Gray	4 pc set	PT206-12041-03	
Matrix - 2WD (w/o Rear Heater)	×	×	×	×	×	×	Τ		Gray	4 pc set	PT206-12042-03	
Matrix (W/O Netrol)					×			Τ	Glay	4 pc set	01-200-120/0-03	
Mahris - 2MU	T				<		`	>	Dark Charmat		PT2/06-12/01-14	
Matrix - AWD							٩×	< ×	Dark Charcoal	4 DC Set	PT208-12091-14	
Matrix - 2WD							×	×	Dark Charcoal	4 pc set	PT206-12092-14	
Matrix - AWD					•		×	×	Dark Charcoai	4 pc set	PT206-12093-14	
MR2 Spyder	×						Π		Black w/ Red Logo	2 pc set	PT548-17030-02	
MR2 Spyder	×	Ι							Black w/ Yellow Logo	2 pc set	PT548-17030-09	
MR2 Spyder	×	Ι					Τ	Τ	Black w/ Silver Logo	2 pc set	PT548-17030-13	
MIKZ Spyder	×	Τ							Black w/ Tan Logo	2 pc set	PT548-17030-24	
MKZ Spyder	× :	×	×				Τ	Τ	Black w/ Silver Logo	2 pc set	PT548-17031-13	
MITZ SPYCH	×,	×	×				Τ		PIBCK M/ 1BL TODO	2 pc set	PT548-1/031-24	
Prive	× ,						Τ	T	Cray	4 pc set	F1208-47030.03	
Prins		×	×				Т	Τ	Varia	4 DC Set	PT208-47045-10	
Prius		×	×	×	×	×	×		Dark Gray	4 pc set	PT208-47045-11	
Prius				×	×	×	×	Γ	Dark Bisque	4 pc set	PT208-47060-14	
Prius								×	Misty Gray	4 pc set	PT926-47100-10	
Prius	-							×	Dark Gray	4 pc set	PT926-47100-11	
Price	1						Т	×	Black	4 pc set	PT926-47100-40	
K87 4	×						Т	T	Tourse	4 pc set	P1208-42021-03	
Rav 4 - FV	<	Γ				T	Т	T	Grav	4 DC set	PT208-42021-13	
Rav 4	×								Taupe	4 pc set	PT208-42044-15	
Rav 4	×						Π	Π	Gray	4 pc set	PT208-42041-03	
Rav 4		x	×						Dark Gray	4 pc set	PT208-42041-01	
Rav 4		×	×						Taupe	4 pc set	PT208-42041-04	
Hav 4 (w/o 3rd row)		Ţ		×	×,	×	,	,	Cost Character	4 pc set	PT208-42051-04	
Rav 4 (who and the)		Ţ		××	× ×	< >	< >	<	Ash	4 pr cet	PT208-42051-31	
Rav 4 (w/ 3rd row)		Γ		×	×	×	-		Taupe	4 po set	PT208-42061-04	
Rav 4 (w/ 3rd row)		Π		×	х	×	×	×	Ash	4 pc set	PT208-42061-31	
Rav 4 - Sport (w/o 3rd row)		Ţ					×	×	Dark Charcoal	4 PC Set	PT208-42091-11	
Rav 4 (w/ 3rd mw)	-	Ι					××	× >	Sand Beide	4 PC SR	P1208-4208-40	
Sequoia	×	×		L			Γ		Light Charcoal	4 pc set	PT206-0C030-11	
Sequoia	×	×							Oak	4 pc set	PT206-0C030-14	
Sequoia			×	×	×	Τ	1	T	Taupe	4 pc. set	PT206-0C050-09	
Sequora			×	×	×	1	1	,	LIGHT Charcoal	4 pc. set	P1206-0C060-11	
Sectoria		Τ				×	×	×	Sand Baine	4 PC Set	PT926-00084-11	
Sectors		Τ			Τ	×		< ,	Black	4 nc set	PT926-0C084-20	
Section - 7 Passencer		Ι			Ϊ	< >	< >	•	Grant	100	PT026_0C081_51	
Sequoia - 7 Passenger	T	Γ			Т	۰×	٩×	< ×	Black	19	PT926-0C081-20	
Secucia - 7 Passenger	t	I				d ×	< >		Sand Beice		PT926-0C081-41	
Sequoia - 7 Passenger	Ì	Г				٩×	٩×	< ×	Grav Grav	18	PT926-0C087-11	
Sequoia - 7 Passenger	T	Γ				٢×	۰×	×	Sand Beige	2 2	PT926-0C087-41	
Sequoia - 7 Passenger	Γ					×	×	×	Black	1	PT926-0C087-20	
Sequoia - 8 Passenger		Π				×	×	×	Gray	1 DC	PT926-0C088-11	
Sequoia - 8 Passenger						×	×	×	Sand Beige	1pc	PT926-0C088-41	
Sequoia		Τ				Т	T	×	Dark Brown	4 pc set	PT926-0C104-01	
Sequola - / nassenger Servicia - 7 Passender		T			T	Т	T	× ,	Dark Rrown	2 8	P1325-UC107-01	
Securitia - 8 Passenner Securitia - 8 Passenner		Τ	l		Τ	Т	T	Ţ	Dark Brown	3 8	PT9260C108-01	
		1	ĺ		1	1	1	ļ		-		
Sienna	×			Π	Π	H	Η	Π	Gray	pc (bench seat)	PT208-08010-01	
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Sienna	×				1	┥	╉		Oak	pc (bench seat)	PT208-08010-04	
Sienna	×			1	1	t	+	t	Gray 200	5 pc (capteins seat) 5 pc (contraine seat)	10-11090-90214	
Sienca	.,				t	t	╈	t	Grav	bc (bench seat)	PT208-08030-01	
Sienna	×			Γ	t	t	┢	t) S	pc (bench seat)	PT208-08030-04	
Sienra	×	1			t	t	┢	ſ	Grav	5 pc (captains seat)	PT208-08031-01	
Sienna	×			Γ	r	t	┢	Ī	ě	5 pc (captains seat)	PT208-08031-04	
Sienna	×			Γ	1				Gray	5 pc set	PT208-08021-01	
Sienna	×		Ľ			1	┝		Oak	5 pc set	PT208-08021-04	_
Sienna	×	1.	L				H		Gray	5 pc set	PT208-0803 -01	_
Sienna	×					-	Η		Oak	5 pc set	PT208-0803 -04	
Sienna - 7 pass		×	×			-			Taupe	4 pc set	PT208-08040-04	
Sienna - 7 pass		×	×			-	-		Stone	4 pc set	PT208-08040-21	
Sienna - 7 pass		×	×			-	-		Тацре	5 pc set	PT208-08041-04	
Sienna - 7 pass		×	×				1		Stone	5 pc set	PT208-08041-21	
Sienna - 7 pass		×	×	×	×	1	┫		Taupe	N N N	PT208-08048-04	
Sienna - 7 pass		×	×	×	×	┫	┥		Stone	DC Bet	PT208-08048-21	
Sienna - 8 pass		×					+		Taupe	4 pc set	P1208-08042-04	
Sienna - 8 pass		×			1	┫	┥	1	stone	4 pc set	F1208-08042-21	_
Sienna - 8 pass		×	×	×	×				Taupe	5 pc set	PT208-08043-04	_
Sienna - 8 pass		×	×	×	×	+	╉	1	Stone	o pc set	P1208-08043-21	
Sienna - 7 pass		×	×	×	×	┫	╉	1	laupe	2 00 586	P120 -080 /-04	
Sienna - 7 pass		×	×	×	×	1	+		Stone	2 DC 361	P 20 -080 /-21	
Sienna - 8 pass		×	×	×	×	╈	╉	t		4 pc set	P 120 -080 8-04	
SSEd 0 - Billiero		-	<	×	×	1,	١,	,	Taure	100 04	DT30 000 0-21	_
Ciccon - 7 2000				Ι	T	,			Store		DT20 00087.12	_
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Sianna - 8 nece				Ι		•		• >	Store	nc sat	DT20 _06088-12	_
Solara - Hard Ton	,			Γ	T	1	t	ſ	knrv	4 nc set	PT20 -0 030-10	_
Solare - Hard Top	•			1	T	t	╈	t	Gen	4 nc set	PT20 -0 020-11	_
Solare - Contestinto	• •				T	t	╈	T			DT20 -0 031-10	_
Colara - Contractible Solara - Contractible	<,				T	╈	╈	t	Grav		DT20 -0 02-10	_
Solars - Constitute	ŗ	ŀ	`	,	5	╈	╋	t	Dark Stone	4 nc set	PT20AL0 MAR.21	_
Solara - Convertitie		ł	•	<	 	t	╈	T	Dark Charmoal	4 nc set	PT208-0 048-11	-
Solara - Convertible		٩×	< >	(>	1	t	┢	t	Ivor	4 pc set	PT208-0 048-10	-
Solara - Hard Ton		· >	: >	د ۲	: >	t	+-	ľ	Dark Stone	4 DC Ref	PT208-0 040-21	_
Solarra - Hami Ton		×	×	•	1	t	┢╸	ľ	Dark Charcoal	4 oc set	PT208-0 040-11	_
Solare - Hard Ton		ł	ŀ	()	7	┢	┢	ľ	None	4 no set	PT20R-0 040-10	_
Solars - Concertible		<	۰	< ,	4	,	t	T	Dark Stone		PT20 0 0 8.21	_
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Solara - Convertuse		ļ		×	ĸ,	×,	╈	T		100 000 v		_
Source - Convertible				×	×	×	╉	T	Pods Stone			_
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Solala - coupe				×	×	1	$^{+}$	Ī				_
Solara - Coupe				×	×	×	╉	1	Vovi	4 pc set	P120 -0 0-0214	_
Solara - Coupe				×	×	×	╉	T	Dark Stone	4 pc set	P120 0 080-21	_
Solara - Coupe	-			×	×	×	╉		Dark Charcos	4 pc set	P120 -0 060-11	_
Solara - Coupe				×	×	×	╉	1	ivery	4 pc set	P120 -0 080-10	_
Solara - Convertible				×	×	×	×	×	Dark Stone	4 pc set	PT20 -0 088-21	_
Solara - Convertible				×	×	×	×	×	Dark Charcoat	4 pc set	P120 -0 088-11	_
Solara - Convertible				×	×	×	×	×	Nory	4 DC set	PT20 -0 068-10	_
Tacoma - Reg Cab	×	×		ľ		t	╈		Light Charcoal	Z DC Set	P120 -350001	_
I acoma - Keg Cab	×	×		T	T	╈	╉	t			P120 -3564 44	_
I acorna - Access Cab	×	×		Ι	T	╈	+	t		4 DC 561	LI-120 -2001 -1	_
Tacoma -Access Cab	×	×			1	1	╈		Cak	4 pc set	UUZU0-359 4-1	_
acoma - Louble Cab	×	×		Τ	T	╈	╉	t		4 pc set	11-2000-021-	_
1 acoma - Double Cab	×	×			T	1	+		Cak	4 pc ser	P120 -35072-1	
Tacoma - Reg Cab			×	×	×	1	┥	1	Light Charcoal	2 pc set	PTZ0 -35050-11	
Tacoma - Reg Cab			×	×	×	1	┥	1	Cak	2 pc set	P120-35050-14	
Tacoma - Access Cab			×	×	×		-		Light Charcoal	4 pc set	PT20 -35051-11	-
Tacoma - Access Cab			×	×	×	┫	┥		Oak O	4 pc set	PT20 -35051-14	
Tacoma - Double Cab			×	×	×				Light Charcoal	4 pc set	PT20 -35052-11	_
Tacoma - Double Cab			×	×	×		-		Oak	4 pc set	PT20 -35052-14	
Tacoma - Acc Cab TRD			×	×	×				Charcoal	4 pc set	PT20 -35055-11	
Tacoma - Dbl Cab TRD			×	×	×	┢	⊢		Charcoa	4 pc set	PT20 -3505 -11	_
Tacoma - Reg Cab					T	×	×	×	Light Charcoal	2 pc set	PT20 -35080-11	_
Tacoma - Reo Cab					T	×	×	ſ	Oak	2 pc set	FT20 -35080-14	
Tamma - Anness Cab					Ì	İ,	١,	ļ,	l joht Chamoal	4 po set	PT20 -35081-11	
Tacoma - Access Cab						×	×	ľ	Oak	4 DC Set	PT20 -35081-14	-
Tacoma - Double Cab					t	1,	t,	,	Light Charcoal	4 pc set	PT20 -35082-11	
Tacoma - Double Cab				1	t	×	İ,	t	Oak	4 pc set	PT20 -35082-14	
Territion - Acr Cali TRO		1		T	t	t	t,	١,	Channal	A or set	PT20_35085_11	
Tecome - Obl Cab TRD				T	t	\$	\$	4,	Charcoal	4 Inc set	PT20 -3508 -11	
Teroma - Par Cah	I			Т	t	4		,	Sand Baire	2 nc sat	PT20 -35090-43	
				T	T	†		,	Cood Boico		DT30 35/01 42	
I acoma - Access Lap				T	T	†	\mathbf{x}	׆	Sand beige	4 DC %E	P120 -30031-0	_
Tacoma - Double Cab				T	Ť	+	×	×	Sand beige	4 pc set	P120 -30092-13	_
Tacoma - Reg Cab				Ι	1	+	+	×	Light Charcoal	2 pc set	PT20 -35100-13	_
Tacoma - Reg Cab							Η	×	Dark Charcoal	2 pc set	PT20 -35100-15	_
Tacoma - Access Cab					Π	Π	Η	×	Light Charcoal	4 pc set	PT20 -35101-13	
Tacoma - Access Cab					П	Η	Η	×	Dark Charcoal	4 pc set	PT20 -35101-15	_
Tacoma - Double Cab					Γ	F	⊢	×	Light Charcoal	4 pc set	PT20 -35102-13	-
Tacoma - Double Cab	Ī			Γ	t	t	┢	×	Dark Charcoal	4 pc set	PT20 -35102-15	_
Tacoma - Acc Cab TRD	Γ	l		Γ	F	F	┢	×	Light Charcoal	4 55 Set	PT20 -35105-13	_
Tacoma - Dbl Cab TRD	Ī			Γ	t	t	┢	i,	Light Charcoal	4 pc set	PT20 -3510 -13	_
Tundra - Reg Cab	×	×		Γ	t	t	┢	ŗ	Lioht Charcoal	2 DC 961	PT548-34030-11	_
Tundra - Red Cab	ľ	×		Γ	t	t	⊢	t	Dark Charcoal	2 DC set	PT548-34030-12	_
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11 2000 01 01	TE48-34030-14	T548-34031-12	T548-34031-14	T548-34032-11	T548-34032-12	1548-34032-14	T548-34040-11	T548-34040-12	T548-34040-14	T548-34051-09	T548-34051-11	T548-34051-12	T548-34052-09	T548-34052-11	T548-34052-12	T548-34050-09	T548-34050-11	T548-34050-12	T548-34062-11	7206-34071-11	T208-34071-12	T206-34071-43	T206-34072-11	T206-34072-12	T206-34072-43	T206-0T090-20	7206-52060-11	T206-52061-11	T206-52090-40	T206-52091-11	T206-52100-18	TORE 52100.45
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Toyota Carpet Floor Mats (Sorted By Part Number)

ription	Piece Set No.	4 pc set	4 pc set	4 pc set	4 pc set	4 pc set	4 pc set	4 pc set 4 pc set	4 pc set		4 pc set	4 pc set	4 bc set	4 pc set	4 pc set	4 DC 500	4 DC set	4 pc set	4 pc set	4 pc set	A no set	4 pc set	4 pc set	4 pc set	4 pc set		4 pc set	4 pc set	4 pc set	4 pc set	4 DC 961 4 DC 661	4 DC set	4 pc set	4 pc set	4 DC Set	4 pc set	4 pc set	4 pc set	4 pc set	4 pc set	4 pc set	5 pc set	4 pc set	4 pc set	6 pc set	6 pc set	5 pc set	4 pc set	4 pc. set	4 pc. set	4 pc set	4 pc set	4 pc set	4 pc set	4 pc set	4 pc set	4 pc set 4 pc set	4 pc set	4 pc set	10% 24
Mat Desc	Color	Dark Charcoal	Ś	Gray	Light Gray	Oak	Gray	Light Gray Oak	Grav	1 inht Cons.	Light Gray Oak	Gray	Light Grav	Oak	Gray	Dark Champal	Bisque	Dark Charcoal	Bisque	Dark Charcoal	Dark Charmal	Bisque	Bisque ·	Brown	Diowi	Grav	hory	Gray	lvon	Dark Charcoal	Light Store	Dark Charcoat	Dark Stone	Nory Pred Channel	Dark Stone	lvory	Dark Charcoal	Lark Stone	Graphite	Light Gray	Taupe	Stone	Taupe	Stone	Taupe	Stone	Light Charroat)ak	Taupe	Light Charcoal	Gray	Gray	Gray	Grav	Gray	Grav	Gray Dark Charcoal	Dark Charcoal	Dark Charcoal	VIIGIUME
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	Model	Matrix - 2WD	Tacoma -Access Cab	: Coroita - Sport Edition (w/ Rear Heater)	Corolla (w/ Rear Heater)	Corolia (w/ rear Heater) Corolia - Sport Edition (w/o Rear	Heater)	Corolla (w/o Rear Heater) Corolla (w/o Rear Heater)	Corolla - Sport Edition (w/ Rear	Comits (w/ Rear Heater)	Corolia (w/ Rear Heater)	Corolla - Sport Edition (w/o Rear Hester)	Corolla (w/o Rear Heater)	Corolla (w/o Rear Heater)	Corota (w/ Rear Heater)	COLONIA (W/V TYDAI FRAMAL)	Corolta	Conlia	Corolla	Corolla	Comla	Corolla	Corolla	Corolia	Solara - Hard Ton	Solara - Hard Top	Solara - Convertible	Solara - Convertible	Solara - Coupe	Solara - Coupe	Solara - Convertible	Solara - Convertible	Solara - Convertible	Solara - Coupe	Solara - Coupe	Solara - Convertible	Solara - Convertible	Avalon Avalon	Avaion	Avalon	Sienna - 7 pass	Sienna - 7 pass	Sienna - 8 pass	Sienna - 7 Dass	Sienna - 7 pass	Sienna - 8 pass	Secucia Secucia	Sequoia	Sequoia	Sequora	Matrix - AWD (w/ heater)	Matrix - 2WD (w/ heater)	Matrix - ZWUJ (W/O heater) I Matrix - AMD /u/ Rear Heater)	Matrix - ZWD (w/ Rear Heater)	Matrix - 2WD (w/o Rear Heater)	Matrix (w/o heater)	Matrix (W/ Regiler) Matrix - 2WD	Matrix - AWD	Matrix - AWU	
	Part Number	PT206-12092-14	00200-35964-16	PT206-02030-03	PT206-02030-11	91-02020-0021-4	PT206-02031-03	PT206-02031-11 PT206-02031-16	PT206-02040-03	PT206-02040-11	PT206-02040-16	PT206-02041-03	PT206-02041-11	PT206-02041-16	P1206-02050-01	PT206-02090-12	PT206-02090-41	PT206-02091-12	PT206-02091-41	PT206-02092-12	PT206-02093-12	PT206-02093-41	PT206-02093-41	P1206-02102-45	PT208-06030-10	PT208-06030-11	PT206-06031-10	PT206-06031-11	PT206-06060-10	PT205-0000-11	PT206-06068-10	PT206-06068-11	PT206-06068-21	PT205-06080-10	PT206-06080-21	PT206-06088-10	P1206-06088-11	PT206-07090-02	PT206-07090-16	P 1205-07090-18	PT206-08067-04	PT206-08067-21	PT205-08068-04	PT206-06087-12	PT206-08087-41	P1206-08088-12	PT206-0C030-11	PT206-0C030-14	PT206-0C050-09	P1206-01090-20	PT206-12030-03	PT206-12031-03	P1206-12032-03	P1206-12041-03	PT206-12042-03	PT206-12070-03	PT206-12090-14	PT206-12091-14	PT2U0-12U83-14	1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1

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Sienna - 7 pass	Sienna - 7 pass	Sienna - 7 pass	Signation	Sienna	Sienna	Sienna	Sienna	Sienna	Sienne	Sienna	Sienra	Sienna	Avalon	Avalon	Avalon	Avelon	Avalor	INDEAN	Avaion	Avaion	Solara - Conventible	Solara - Convertible	Solara - Convertible	Solara - Hard Top	Solara - Hard Top	Solara - Hard Top	Land Cruiser	Land Cruiser	Land Cruiser	Land Cruiser	Land Cruiser	Yaris- Sedan	Yaris- Sedan	Yans - Lift Back	Yaris-Sedan	Yaris- Sedan	Tails - Litt Batan			Taxoma - DN/Cab TDD	Tacoma - Acc Cab TED	Tacoma - Double Cap	Lacoma - Access Cab	Tacoma - Access Cab	Tacoma - Reg Cab	lacoma - Keg Cab	Tacoma - Double Cab	Tacoma - Access Cab	Tacoma - Reg Cab	FJ Cruiser	Tacoma - Dbl Cab TRD	Tacoma - Acc Cab TRD	Tacoma - Double Cab	Tacoma - Double Cab	Tarnma - Avress Cab	Tacoma - Reg Cab	Tacoma - Reg Cab	Facoma - Dbl Cab TRD	Tacoma - Acc Cab TRD	Taroma - Double Cab	Taborna - Aucess Cap	Tacoma - Access Cab	Tacoma - Reg Cab	Tacoma - Reg Cab	Tacoma - Double Cab	Facoma - Double Cab	Tacoma - Access Cab	Tacoma - Reg Cab	Tundra - D Cab & Crew Max	Tundra - D Cab & Crew Max	Tundra - D Cab & Crew Max	Tundra - Reo Cab	Tundra - Red Cab	Tundra - Reo Cab	Camry / Camry Hybrid	Carnry Hybrid	Camry / Caney Hybrid	Camry / Camry Hybrid
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PT208-08042-04	PT208-08042-21	PT208-08043-04	DTTOP-DB/043-27	PT208-08048-21	PT208-32020-01	PT208-32020-04	PT208-32020-21	PT208-32041-01	PT208-32041-04	P1208-42020-11	F1200-42021-03	CI-12004-00170	10-11021-0011-0	012/0042/041-U3		P1208-42044-15	P120042001-04	F1208-42051-11	P1208-42051-31	P1208-42061-04	P1208-42061-31	P1208-42081-40	P1208-42083-40	11200-12091-1	010/10/10/10/02	20-020/1-021	PT2/06 47/46 11	PT208-47060-14	P7208-48010-01	PT208-48010-10	PT208-48041-10	PT208-48041-31	PT208-48042-10	PT208 48042 31	PT208-48061-10	PT208-48061-31	PT208-52030-11	PT208-52030-44	PT208-52031-11	PT208-52031-44	PT208-52033-11	PT208-52033-44	PT208-52034-11	PT208-52034-44	PT208-89004-20	PT208-89030-04	PT208-89030-21	PT548-07050-10	PT548-07050-11	PT548-07050-12	P1548-0/050-22	P1548-0/0/0-10 DTc48-07070-14	PT548-07070-12	PT548-07070-22	PT548-17030-02	PT548-17030-09	PT548-17030-13	P1548-17030-24	PT548-17031-24	PT548-34030-11	PT548-34030-12	PT548-34030-14	PT548-34031-11	PT548-34031-12	PT548-34031-14	P1548-34032-11	P 346-34032-12	P1548-34032-14	DTEA8-34040-13	DTEAS 24040-12	41-040-0401-1	PTE48-34050-04	P1240-34050-11	DT648-34050-12	DTEAL MORT 11	PT548-34051-12	PT548-34052-09	PT548-34052-11	PT548-34052-12	PT548-34062-11	PT548-48060-10

P1825-47100-40	11-00174-07614	PT926-47100-10	PT9260C108-01	PT926-0C107-01	PT926-0C104-01	PT926-0C101-01	PT926-0C088-41	PT926-0C088-11	PT926-0C087-41	PT926-0C087-20	PT926-0C087-11	PT926-0C084-41	PT92R-0000-11	P1926-0C081-41	PT926-0C081-20	PT926-0C081-11	PT919-48082-41	PT919-48082-22	PT919-48082-11	F 1 3 13-4000 1-22	PT919-48080-41	P1919-48080-22	PT919-48080-11	PT548-60070-11	P1548-48074-31	PT548-48074-10	PT548-48063-31	PT548-48063-10	PT548-48062-31	P1048-48060-31
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(Sorted By Pa	Lexus Carpet
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George Morino / TMS Toyota Customer Services Quality Compliance October 1, 2009 Approved By: Bob Waltz

To:All Toyota DealersFrom:Toyota Customer Services

Toyota-Lexus Consumer Safety Advisory Potential Floor Mat Interference with Accelerator Pedal *******URGENT******

Toyota greatly appreciates your patience during this activity. Here is additional information about the Toyota-Lexus Consumer Safety Advisory ("Consumer Safety Advisory"), to add to our communication of September 29th.

A Safety Campaign will be launched soon with clear dealer instructions and an owner notification to visit their local Toyota dealership regarding the affected vehicles. Until the Safety Campaign is launched, Toyota recommends the following action(s) be taken by your staff:

Overall Dealership Operations

- Conduct a management meeting to familiarize all department heads with the Consumer Safety Advisory. Service, Loaner Vehicle (TRAC), Carwash, New Vehicle, New Car Preparation, Used Vehicle, Used Vehicle Reconditioning, Parts, and Body Shop operations should be familiar with the Consumer Safety Advisory and its contents.
- Each Dealership should designate two management level associates with complementary schedules to become intimately familiar with all aspects of the Consumer Safety Advisory, Q&A as well as other materials we have provided. These two associates should coordinate all operations related to this activity.
- New, Used, and Loaner Vehicle (TRAC) departments should coordinate with the Service Department to assure the driver's floor mat is semi-permanently installed. This should be conducted on the following involved vehicles until the safety campaign has been launched.

Toyota Models

- 2007 2010 Camry
- 2005 2010 Avalon
- 2004 2009 Prius
- 2005 2010 Tacoma
- 2007 2010 Tundra

Customer Handling

- Please welcome concerned owners that visit your dealership and answer any questions that they may have. Please utilize the Q&A to assure a consistent message is communicated.
- Assist any customer who asks to verify correct application and secure installation.
- Please encourage owners to make sure the floor mats are compatible for their model and model year. Also, they need to be sure they are properly secured using the appropriate retention device (clips). Driver's floor mats should never be stacked. Consumers should never place any floor mat – aftermarket or not -- on top of another driver's floor mat. Mats should also not be flipped over with the bottom-side up.
- Information on proper floor mat installation can be found on <u>http://www.toyota.com</u>.
- Owners with additional questions or concerns, are asked to please contact the Toyota Customer Experience Center (1 800 331-4331).

Service Department

- Please coordinate with other dealership departments to *semi-permanently* install the driver's position floor mat in involved new, used, loaner (TRAC) and demo vehicles. Read and follow the attached technical instructions. The necessary materials are available at local hardware and office supply stores. This will assure the floor mats are *not removable*. We recommend the Service Department designate associates to conduct this specific installation to assure that the involved vehicles are handled
- Owners' vehicles in for service should <u>all</u> be inspected for proper installation of the correct floor mats at the time of delivery (including after the car wash) and document this on the Repair Order (RO).
 - If an involved vehicle owner expresses concern over the safety of their vehicle, recommend removal of the driver's side floor mat (place in the trunk) until they are contacted by Toyota regarding the forthcoming Safety Campaign. Document this action on the RO.
 - If the owner prefers to have the floor mat semi-permanently installed, please follow the attached instructions.
- If your dealership provides "car washes on demand", proper floor mat installation should be ensured on every vehicle after this service, as well.

Sales Department

- Sales deliveries of involved Avalon, Camry, Prius, Tacoma and Tundra new, CPO or used vehicles should include semi-permanently installed driver's position floor mats that are designed specifically for that model. As many customers will be sensitive to the recent Consumer Safety Advisory, we recommend that they be informed that the driver's floor mat is semi-permanently installed and not removable. Toyota will notify customers when the Safety Campaign is initiated to return their vehicle for the remedy. The driver's floor mat will be rendered removable at that time.
- Owners may also choose to have the driver's floor mat placed in the trunk until the safety campaign remedy is available. Please advise the owner of this option.
- Document the condition of the driver's floor mat at vehicle delivery (e.g. "the correct driver's side floor mat is *semi-permanently* installed" or "removed driver's side floor mat") in a one-line RO.
- All dealership demos should be checked regularly to confirm the use of correct and properly installed floor mats.

Parts Department

Any Toyota All Weather Floor Mat (AWFM) in your inventory should be removed from inventory and returned:

- Dealers should prepare either a TMP-134 Claim (Toyota) listing the part numbers and quantities of each AWFM they are requesting to return. These claims should be submitted to the facing PDC using the normal method in Dealer Daily.
- The return code for each part should be indicated as R-2, Manufacturing Defect.
- When your dealership receives authorization from your facing PDC to make the return, please return the AWFMs immediately. The different AWFMs should be grouped by part number to assist the PDC in accurately accounting for the returned quantities.

If you are approached by the media, please direct them to Toyota Corporate Communications at 310.468.2552 or 310.468.4718. When you must speak to any media representatives, please reference the information we've provided, on how to identify and properly install the correct floor mats, as well as your efforts to instruct owners about the importance of the proper installation of floor mats designed specifically for their vehicle.

We hope this information is helpful. Please direct any additional questions you may have to your Region/PD/Area representative so that we can continue to address your issues as we work through this experience together.



Read these important warnings BEFORE installing ANY type of Floor Mat.

A. General Floor Mat Warnings

- Only install floor mats designed specifically for that model and model year. Check for correct model name and part number on the packaging label to confirm vehicle application.
 - Never install a floor mat if you are uncertain of the model application. 0 ο
 - Never install the floor mat upside down or turned over for any reason.
 - Only install the driver's floor mat in the driver's foot area. 0
- Always properly secure the driver's floor mat using the retaining hooks (clips) supplied in the bag with the floor mats. Follow the floor mat retention clip installation instruction supplied with the clips. If the mat is properly secured and you have confirmed vehicle applicability, it will not interfere with the accelerator pedal.
- After the driver's mat is secured by the retaining hooks (clips) semi-permanently install the floor mat to the vehicles using the self-locking nylon tie-wraps mentioned in the instructions below.
 - Never install the front driver's floor mat without all retaining hooks (clips) securing the mat firmly in place and the self-locking nylon tie-wraps semi-permanently installing the floor mat to the vehicle.
- The retaining hooks (clips) are designed to accommodate only one floor mat at a time. Do not install another floor mat(s) on top of an existing driver's floor mat. 0
- After installation, always check the operation of the accelerator, brake and clutch (if applicable) pedals to assure the floor mat does not interfere with them.
- Carefully read the warning tag attached to the driver's floor mat regarding installation.

B. Floor Mat Inspection Instructions and Application Information

- Before placing a floor mat in a vehicle, be familiar with the procedure outlined below.
 - Identify the correct driver's floor mat for the specific vehicle application. 0
- Correctly install the driver's floor mat.
- Regularly verify the correct floor mat is securely installed in the appropriate model using the retaining
- Regularly verify the correct driver's floor mat is semi-permanently installed in the appropriate model using the self-locking nylon tie-wraps.

NOTE: Use the Application Information Chart provided or the Accessory Parts Catalog to verify mat-to-





Make sure the driver's floor mat is properly secured by the retaining hooks (clips). Confirm that the retaining hooks (clips) are secured into the grommet holes in the vehicle's floor (carpet).

Warning: Do not stack the floor mats in any vehicle. The retaining hooks (clips) are designed to accommodate only one floor mat at a time.

Driver's Position Semi-Permanent Installation C.

- 1. **Necessary Materials**
 - Self-locking nylon Tie-Wraps (Must be UV-resistant, rated at 50 pounds minimum & 0.19 inches wide) •
 - Easy Peel Labels (Use Avery® 5260™) •
 - Thin Flat-Head Screwdriver
 - **Fine-Pointed Punch** •
 - Ruler
 - **Diagonal Cutting Pliers**

Applicable to '05 – '10 Avalon, '07 – '10 Camry, '04 – '09 Prius, '05 – '10 Tacoma, '07 – '10 Tundra vehicles only. Toyota Floor Mat Inspection, Application and Semi-Permanent Installation Instructions

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George Morino / TMS Toyota Customer Services Quality Compliance October 1, 2009 Approved By: Bob Waltz

To: All Toyota Dealers From: Toyota Customer Services

Toyota-Lexus Consumer Safety Advisory Potential Floor Mat Interference with Accelerator Pedal ******URGENT******

Toyota greatly appreciates your patience during this activity. Here is additional information about the Toyota-Lexus Consumer Safety Advisory ("Consumer Safety Advisory"), to add to our communication of September 29th.

A Safety Campaign will be launched soon with clear dealer instructions and an owner notification to visit their local Toyota dealership regarding the affected vehicles. Until the Safety Campaign is launched, Toyota recommends the following action(s) be taken by your staff:

Overall Dealership Operations

- Conduct a management meeting to familiarize all department heads with the Consumer Safety Advisory. Service, Loaner Vehicle (TRAC), Carwash, New Vehicle, New Car Preparation, Used Vehicle, Used Vehicle Reconditioning, Parts, and Body Shop operations should be familiar with the Consumer Safety Advisory and its contents.
- Each Dealership should designate two management level associates with complementary schedules to become intimately familiar with all aspects of the Consumer Safety Advisory, Q&A as well as other materials we have provided. These two associates should coordinate all operations related to this activity.
- New, Used, and Loaner Vehicle (TRAC) departments should coordinate with the Service Department to assure the driver's floor mat is semi-permanently installed. This should be conducted on the following involved vehicles until the safety campaign has been launched.

Toyota Models

- 2007 2010 Camry
- 2005 2010 Avalon
- 2004 2009 Prius
- 2005 2010 Tacoma
- 2007 2010 Tundra

Customer Handling

- Please welcome concerned owners that visit your dealership and answer any questions that they may have. Please utilize the Q&A to assure a consistent message is communicated.
- Assist any customer who asks to verify correct application and secure installation.
- Please encourage owners to make sure the floor mats are compatible for their model and model year. Also, they need to be sure they are properly secured using the appropriate retention device (clips). Driver's floor mats should never be stacked. Consumers should never place any floor mat – aftermarket or not -- on top of another driver's floor mat. Mats should also not be flipped over with the bottom-side up.
- Information on proper floor mat installation can be found on <u>http://www.toyota.com</u>.
- Owners with additional questions or concerns, are asked to please contact the Toyota Customer Experience Center (1 800 331-4331).

Service Department

- Please coordinate with other dealership departments to *semi-permanently* install the driver's position floor mat in involved new, used, loaner (TRAC) and demo vehicles. Read and follow the attached technical instructions. The necessary materials are available at local hardware and office supply stores. This will assure the floor mats are *not removable*. We recommend the Service Department designate associates to conduct this specific installation to assure that the involved vehicles are handled consistently.
- Owners' vehicles in for service should <u>all</u> be inspected for proper installation of the correct floor mats at the time of delivery (including after the car wash) and document this on the Repair Order (RO).
 - If an involved vehicle owner expresses concern over the safety of their vehicle, recommend removal of the driver's side floor mat (place in the trunk) until they are contacted by Toyota regarding the forthcoming Safety Campaign. Document this action on the RO.
 - If the owner prefers to have the floor mat semi-permanently installed, please follow the attached instructions.
- If your dealership provides "car washes on demand", proper floor mat installation should be ensured on every vehicle after this service, as well.

Sales Department

- Sales deliveries of involved Avalon, Camry, Prius, Tacoma and Tundra new, CPO or used vehicles should include semi-permanently installed driver's position floor mats that are designed specifically for that model. As many customers will be sensitive to the recent Consumer Safety Advisory, we recommend that they be informed that the driver's floor mat is semi-permanently installed and not removable. Toyota will notify customers when the Safety Campaign is initiated to return their vehicle for the remedy. The driver's floor mat will be rendered removable at that time.
- Owners may also choose to have the driver's floor mat placed in the trunk until the safety campaign remedy is available. Please advise the owner of this option.
- Document the condition of the driver's floor mat at vehicle delivery (e.g. "the correct driver's side floor mat is *semi-permanently* installed" or "removed driver's side floor mat") in a one-line RO.
- All dealership demos should be checked regularly to confirm the use of correct and properly installed floor mats.

Parts Department

Any Toyota All Weather Floor Mat (AWFM) in your inventory should be removed from inventory and returned:

- Dealers should prepare either a TMP-134 Claim (Toyota) listing the part numbers and quantities of each AWFM they are requesting to return. These claims should be submitted to the facing PDC using the normal method in Dealer Daily.
- The return code for each part should be indicated as R-2, Manufacturing Defect.
- When your dealership receives authorization from your facing PDC to make the return, please return the AWFMs immediately. The different AWFMs should be grouped by part number to assist the PDC in accurately accounting for the returned quantities.

If you are approached by the media, please direct them to Toyota Corporate Communications at 310.468.2552 or 310.468.4718. When you must speak to any media representatives, please reference the information we've provided, on how to identify and properly install the correct floor mats, as well as your efforts to instruct owners about the importance of the proper installation of floor mats designed specifically for their vehicle.

We hope this information is helpful. Please direct any additional questions you may have to your Region/PD/Area representative so that we can continue to address your issues as we work through this experience together.

Toyota Floor Mat Inspection, Application and Semi-Permanent Installation Instructions (10/02/09)



Read these important warnings BEFORE installing ANY type of Floor Mat.

A. General Floor Mat Warnings

- Only install floor mats designed specifically for that model and model year. Check for correct model name and part number on the packaging label to confirm vehicle application.
 - Never install a floor mat if you are uncertain of the model application.
 - Never install the floor mat upside down or turned over for any reason.
 - Only install the driver's floor mat in the driver's foot area.
- Always properly secure the driver's floor mat using the retaining hooks (clips) supplied in the bag with the floor mats. Follow the floor mat retention clip installation instruction supplied with the clips. If the mat is properly secured and you have confirmed vehicle applicability, it will not interfere with the accelerator pedal.
- After the driver's mat is secured by the retaining hooks (clips) semi-permanently install the floor mat to the vehicles using the self-locking nylon tie-wraps mentioned in the instructions below.
 - Never install the front driver's floor mat without all retaining hooks (clips) securing the mat firmly in place and the self-locking nylon tie-wraps semi-permanently installing the floor mat to the vehicle.
- The retaining hooks (clips) are designed to accommodate only one floor mat at a time.
 Do not install another floor mat(s) on top of an existing driver's floor mat.
- After installation, always check the operation of the accelerator, brake and clutch (if applicable) pedals to
 assure the floor mat does not interfere with them.
- Carefully read the warning tag attached to the driver's floor mat regarding installation.

B. Floor Mat Inspection Instructions and Application Information

- Before placing a floor mat in a vehicle, be familiar with the procedure outlined below.
 - Identify the correct driver's floor mat for the specific vehicle application.
 - Correctly install the driver's floor mat.
- Regularly verify the correct floor mat is securely installed in the appropriate model using the retaining hooks (clips).
- Regularly verify the correct driver's floor mat is semi-permanently installed in the appropriate model
 using the self-locking nylon tie-wraps.

NOTE: Use the Application Information Chart provided or the Accessory Parts Catalog to verify mat-to-vehicle application.

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1. Make sure the driver's floor mat is properly secured by the retaining hooks (clips). Confirm that the retaining hooks (clips) are secured into the grommet holes in the vehicle's floor (carpet).

Warning: Do not stack the floor mats in any vehicle. The retaining hooks (clips) are designed to accommodate only one floor mat at a time.

C. Driver's Position Semi-Permanent Installation

- 1. Necessary Materials
 - Self-locking nylon tie-wraps (Must be UV-resistant, rated at 50 pounds minimum, 0.19 inches wide, and 17 inches long)
 - Easy Peel Labels (Use Avery® 5260™)
 - Thin Flat-Head Screwdriver
 - Fine-Pointed Punch
 - Ruler
 - Diagonal Cutting Pliers

Applicable to '05 – '10 Avalon, '07 – '10 Camry, '04 – '09 Prius, '05 – '10 Tacoma, '07 – '10 Tundra vehicles only. Toyota Floor Mat Inspection, Application and Semi-Permanent Installation Instructions







Picture updated on 10/02/09







2. Locate, align & punch driver's floor mat.

- a) Align & punch directly in front of the driver's seat mounting bracket in the three locations shown (see red circles in illustration).
- b) Punch two holes into the lower left driver's floor mat as indicated in step 2a. If necessary, enlarge the holes with a thin flat-head screwdriver.
- Route & fasten self-locking nylon tie-wraps.

Self-locking nylon tie-wraps must be UV-resistant, rated at 50 pounds minimum, be 0.19 STOP inches widen and 17 inches long.

- a) Route and fasten the self-locking nylon tie-wraps through the floor mat and under the seat mounting bracket as illustrated.
- b) Repeat step 2 a) for the right side of driver's floor mat, except puncture only one hole in the
- Tighten the self-locking nylon tie-wraps to remove slack, but do not apply tension or c) displace the secured floor mat from the clipped position.

NOTE:

- Some models may require two tie-wraps joined in series to complete routing.
- Do not remove seat mounting bracket covers, equipped in some models, during the routing process.

Verify correct installation.



- a) Confirm clearance to electrical wiring connectors and any moving components. b) Verify the self-locking nylon tie-wraps are not too loosely or too tightly fastened as illustrated.
- c) Verify the floor mat does not interfere with the accelerator pedal throughout its range of travel.

NOTE:

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5.

Trim excess portion of self-locking nylon tie-wraps and conceal the self-locking portion . of the tie-wrap under the seat bracket and/or floor mat.

Install Labels

- a) Install a label on both of the self-locking nylon tie-wraps, secured to the two seat mounting brackets.
- NOTE: Print on Avery® 5260™ using the template provided.
- b) Make sure to fold over the label so the text is visible from both sides.
- Check the following pedal operation (fully depress the pedal) to assure the floor mat does not 6. interfere with it. Make sure the vehicle is turned off and in the "Park" position when testing:
 - Accelerator Pedal
 - Brake Pedal
 - Clutch Pedal (if equipped)

Applicable to '05 - '10 Avalon, '07 - '10 Camry, '04 - '09 Prius, '05 - '10 Tacoma, '07 - '10 Tundra vehicles only. Toyota Floor Mat Inspection, Application and Semi-Permanent Installation Instructions

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Toyota Carpet Floor Mat Quick Reference Chart (Sorted By Part Number)

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Lexus Consumer Safety Advisory Potential Floor Mat Interference with Accelerator Pedal ****URGENT****

Lexus Customer Services /Lexus Robin LeFevre Approved By Al Smith Published on: 09/30/2009 12:00 AM

To: All Lexus Dealers

From: Lexus Customer Service

Lexus Consumer Safety Advisory

Potential Floor Mat Interference with Accelerator Pedal

******URGENT******

Lexus greatly appreciates your patience during this activity. Enclosed is additional information about the Lexus Consumer Safety Advisory (Consumer Safety Advisory), to add to our communication of September 29th.

A Safety Campaign will be launched soon with clear dealer instructions and an owner notification to visit their local Lexus dealership regarding the involved vehicles. Until the Safety Campaign is launched, Lexus recommends the following actions be taken by your staff:

Overall Dealership Operations

Conduct a management meeting to familiarize all department heads with the Consumer Safety Advisory. Service, Loaner, Carwash, New Vehicle, New Car Preparation, Certified Pre-Owned (CPO)/Used Vehicle, Used Vehicle Reconditioning, Parts, and Body Shop operations should be familiar with the Consumer Safety Advisory and its contents.

Each dealership should designate two management level associates with complementary schedules to become intimately familiar with all aspects of the Consumer Safety Advisory, Q&A as well as other materials we have provided. These two associates should coordinate all operations related to this activity.

New, CPO/Used and Loaner Vehicle departments should coordinate with the Service Department to assure the drivers floor mat is semi-permanently installed. This should be conducted on all the following involved vehicles until the safety campaign has been launched.

2007 2010 ES

2006 2010 IS

Customer Handling

Please welcome concerned owners that visit your dealership and answer any questions they may have and utilize the previously provided Q&A to assure a consistent message is communicated.

Assist any customer who asks to verify correct application and secure installation.

http://dealerdaily/Portal/MessageBoard/MessageDoard Anabian Detail

Encourage owners to make sure the floor mats are compatible for their model and model year. Also, they need to be sure the floor mats are properly secured using the appropriate retention device (clips). Drivers floor mats should never be stacked. Consumers should never place any floor mat aftermarket or not -- on top of another drivers floor mat. Mats should also not be flipped over with the bottom-side up.

Information on proper floor mat installation can be found on http://www.lexus.com.

Owners with additional questions or concerns may also contact the Lexus Customer Assistance Center at 1 800 255-3987.

Service Department

- Please coordinate with other dealership departments to semi-permanently install the drivers position floor mat in involved new, CPO, used, loaner and demo vehicles. Read and follow the attached technical instructions using specified materials which can be found at local hardware and office supply stores. This will assure the floor mats are not removable. We recommend the Service Department designate associates to conduct this installation to assure that the involved vehicles are handled consistently.
- Owners' vehicles in for service should all be inspected for proper installation of the correct floor mats at the time of delivery (including after the car wash); document this on the Repair Order (RO).
 - If an affected ES/IS owner expresses concern over the safety of their vehicle, recommend removal of the driver's side floor mat (place in the trunk) until they are contacted by Lexus regarding the forthcoming Safety Campaign. Document this action on the RO.
 - If the owner prefers to have the floor mat semi-permanently installed, please follow the attached instructions and document this action on the RO.
- If your dealership provides "car washes on demand", proper floor mat installation should be ensured on every vehicle after this service, as well.

Sales Department

- Sales deliveries of involved ES and IS new, CPO or used vehicles should include semi-permanently installed drivers position floor mats that are designed specifically for the model. As many customers will be sensitive to the recent Consumer Safety Advisory, we recommend that they be informed that the drivers floor mat is semi-permanently installed and <u>not</u> removable. Lexus will notify customers when the Safety Campaign is initiated to return their vehicle for the remedy. The drivers floor mat will be rendered removable at that time.
- Owners may also choose to have the drivers floor mat placed in the trunk until the safety campaign remedy is available. Please advise the owner of this option.
- Document the condition of the driver's floor mat at vehicle delivery (e.g. "the correct driver's side floor mat is semipermanently installed" or "removed driver's side floor mat") in a one-line RO.
- All dealership demos should also be checked regularly to confirm the use of correct and properly installed floor mats.

Parts Department

Any Lexus All Weather Floor Mat (AWFM) in your inventory should be returned.

Dealers should prepare a PRR Claim listing the part numbers and quantities of each AWFM they are requesting to return. These claims should be submitted to the facing PDC using the normal method in Dealer Daily.

The return code for each part should be indicated as R-2, Manufacturing Defect.

When your dealership receives authorization from your facing PDC, please return the AWFMs immediately. The different AWFMs should be grouped by part number to assist the PDC in accurately accounting for the returned quantities.

If you are approached by the media, please direct them to Lexus Corporate Communications at 310-468-2552 or 310-468-4718. When you must speak to any media representatives, please reference the information weve provided previously on how to identify and properly install the correct floor mats, as well as your efforts to instruct owners about the importance of the proper installation of floor mats designed specifically for their vehicle.

Please direct any additional questions you may have to your Area representative so that we can continue to address your issues as we work through this experience together.

1. Click here to see Semi-Perm - Installation-Application Instructions - Lexus.pdf

2. Click here to see Semi-Permanent Floor Mat Installation Label 10-01-09.pdf

3. Click here to see FINAL Lexus Carpet Floor Mat Application Information Chart.pdf



Read these important warnings BEFORE installing ANY type of Floor Mat.

A. General Floor Mat Warnings

- Only install floor mats designed specifically for that model and model year. Check for correct model name and part number on the packaging label to confirm vehicle application.
 - o Never install a floor mat if you are uncertain of the model application.
 - o Never install the floor mat upside down or turned over for any reason.
 - o Only install the driver's floor mat in the driver's foot area.
- Always properly secure the driver's floor mat using the retaining hooks (clips) supplied in the bag with the floor mats (in the case of Lexus with the carpet floor mats). Follow the floor mat retention clip installation instruction supplied with the clips. If the mat is properly secured and you have confirmed vehicle applicability, it will not interfere with the accelerator pedal.
- After the driver's mat is secured by the retaining hooks (clips) semi-permanently install the floor mat to the vehicles using the self-locking nylon tie-wraps mentioned in the instructions below.
 - Never install the front driver's floor mat without all retaining hooks (clips) securing the mat firmly in place and the self-locking nylon tie-wraps semi-permanently installing the floor mat to the vehicle.
- The retaining hooks (clips) are designed to accommodate only one floor mat at a time.
 Do not install another floor mat(s) on top of an existing driver's floor mat.
- After installation, always check the operation of the accelerator, brake and clutch (if applicable) pedals to
 assure the floor mat does not interfere with them.
- Carefully read the warning tag attached to the driver's floor mat regarding installation.

B. Floor Mat Inspection Instructions and Application Information

- Before placing a floor mat in a vehicle, be familiar with the procedure outlined below.
- Identify the correct driver's floor mat for the specific vehicle application.
- Correctly install the driver's floor mat.
- Regularly verify the correct floor mat is securely installed in the appropriate model using the retaining hooks (clips).
- Regularly verify the correct driver's floor mat is semi-permanently installed in the appropriate model using the self-locking nylon tie-wraps.

NOTE: Use the Application Information Chart provided or the Accessory Parts Catalog to verify mat-to-vehicle application.





1. Make sure the driver's floor mat is properly secured by the retaining hooks (clips). Confirm that the retaining hooks (clips) are secured into the grommet holes in the vehicle's floor (carpet).

Warning: Do not stack the floor mats in any vehicle. The retaining hooks (clips) are designed to accommodate only one floor mat at a time.

C. Driver's Position Semi-Permanent Installation

- 1. Necessary Materials
 - Self-locking nylon tie-wraps (Must be UV-resistant, rated at 50 pounds minimum, 0.19 inches wide and 17 inches long)
 - Easy Peel Labels (Use Avery® 5260™)
 - Thin Flat-Head Screwdriver
 - Fine-Pointed Punch
 - Ruler
 - Diagonal Cutting Pliers

Applicable to 2007 – 2010 MY ES and 2006 – 2010 MY IS vehicles only.

Lexus Floor Mat Inspection Annlication and Semi-Permanent Installation Instructions



- Locate, align & punch driver's floor mat.
 - a) Align & punch directly in front of the driver's seat mounting bracket in the three locations shown (see red circles in illustration).
- Punch two holes into the lower left driver's floor mat as indicated in step 2a. If necessary, enlarge the holes with a thin flat-head screwdriver.

3. Route & fasten self-locking nylon tie-wraps.

Self-locking nylon tie-wraps must be UV-resistant, rated at 50 pounds minimum, be 0.19 inches wide and 17 inches long.

- a) Route and fasten the self-locking nylon tie-wraps through the floor mat and under the seat mounting bracket as illustrated.
- b) Repeat step 2 a) for the right side of driver's floor mat, except puncture only one hole in the
- c) Tighten the self-locking nylon tie-wraps to remove slack, but do not apply tension or displace the secured floor mat from the clipped position.
- Some models may require two tie-wraps joined in series to complete routing. Do not remove seat mounting bracket covers, equipped in some models, during the routing process.

Verify correct installation.

- a) Confirm clearance to electrical wiring connectors and any moving components. b) Verify the self-locking nylon tie-wraps are not too loosely or too tightly fastened as
- c) Verify the floor mat does not interfere with the accelerator pedal throughout its range of
- Trim excess portion of self-locking nylon tie-wraps and conceal the self-locking portion of the tie-wrap under the seat bracket and/or floor mat.

Install Labels

a) Install a label on both of the self-locking nylon tie-wraps, secured to the two seat

NOTE: Print on Avery® 5260[™] using the template provided.

- b) Make sure to fold over the label so the text is visible from both sides.
- Check the following pedal operation (fully depress the pedal) to assure the floor mat does not 6. interfere with it. Make sure the vehicle is turned off and in the "Park" position when testing:
 - Accelerator Pedai
 - Brake Pedal
 - Clutch Pedal (if equipped)

Applicable to 2007 – 2010 MY ES and 2006 – 2010 MY IS vehicles only.

Lexus Floor Mat Inspection Application and Sami-Dormanant Installation Installation

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Lexus Consumer Safety Advisory Potential Floor Mat Interference with Accelerator Pedal - Updated 10-02-2009 **** URGENT****

Lexus Customer Services /Lexus Robin LeFevre Approved By Al Smith Published on 10/02/2009 12:00 AM

To: All Lexus Dealers

From: Lexus Customer Service

Lexus Consumer Safety Advisory

Potential Floor Mat Interference with Accelerator Pedal

******URGENT*****

Lexus greatly appreciates your patience during this activity. Enclosed is additional information about the Lexus Consumer Safety Advisory (Consumer Safety Advisory), to add to our communication of September 29th.

A Safety Campaign will be launched soon with clear dealer instructions and an owner notification to visit their local Lexus dealership regarding the involved vehicles. Until the Safety Campaign is launched, Lexus recommends the following actions be taken by your staff:

Overall Dealership Operations

- Conduct a management meeting to familiarize all department heads with the Consumer Safety Advisory. Service, Loaner, Carwash, New Vehicle, New Car Preparation, Certified Pre-Owned (CPO)/Used Vehicle, Used Vehicle Reconditioning, Parts, and Body Shop operations should be familiar with the Consumer Safety Advisory and its contents.
- Each dealership should designate two management level associates with complementary schedules to become intimately familiar with all aspects of the Consumer Safety Advisory, Q&A as well as other materials we have provided. These two associates should coordinate all operations related to this activity.
- New, CPO/Used and Loaner Vehicle departments should coordinate with the Service Department to
 assure the drivers floor mat is semi-permanently installed. This should be conducted on all the
 following involved vehicles until the safety campaign has been launched.
 - 2007-2010 ES
 - 2006 2010 IS

Customer Handling

• Please welcome concerned owners that visit your dealership and answer any questions they may have and utilize the previously provided Q&A to assure a consistent message is communicated.
- Assist any customer who asks to verify correct application and secure installation.
- Encourage owners to make sure the floor mats are compatible for their model and model year. Also, they need to be sure the floor mats are properly secured using the appropriate retention device (clips). Drivers floor mats should never be stacked. Consumers should never place any floor mat aftermarket or not -- on top of another drivers floor mat. Mats should also not be flipped over with the bottom-side up.
- Information on proper floor mat installation can be found on http://www.lexus.com.
- Owners with additional questions or concerns may also contact the Lexus Customer Assistance Center at 1 800 255-3987.

Service Department

- Please coordinate with other dealership departments to semi-permanently install the drivers position floor mat in involved new, CPO, used, loaner and demo vehicles. Read and follow the attached technical instructions using specified materials which can be found at local hardware and office supply stores. This will assure the floor mats are not removable. We recommend the Service Department designate associates to conduct this installation to assure that the involved vehicles are handled consistently.
- Owners' vehicles in for service should all be inspected for proper installation of the correct floor mats at the time of delivery (including after the car wash); document this on the Repair Order (RO).
- If an affected ES/IS owner expresses concern over the safety of their vehicle, recommend removal of the driver's side floor mat (place in the trunk) until they are contacted by Lexus regarding the forthcoming Safety Campaign. Document this action on the RO.
- If the owner prefers to have the floor mat semi-permanently installed, please follow the attached instructions and document this action on the RO.
- If your dealership provides "car washes on demand", proper floor mat installation should be ensured on every vehicle after this service, as well.

Sales Department

- Sales deliveries of involved ES and IS new, CPO or used vehicles should include semi-permanently
 installed drivers position floor mats that are designed specifically for the model. As many customers
 will be sensitive to the recent Consumer Safety Advisory, we recommend that they be informed that
 the drivers floor mat is semi-permanently installed and not removable. Lexus will notify customers
 when the Safety Campaign is initiated to return their vehicle for the remedy. The drivers floor mat
 will be rendered removable at that time.
- Owners may also choose to have the drivers floor mat placed in the trunk until the safety campaign remedy is available. Please advise the owner of this option.
- Document the condition of the driver's floor mat at vehicle delivery (e.g. "the correct driver's side floor mat is semi-permanently installed" or "removed driver's side floor mat") in a one-line RO.

• All dealership demos should also be checked regularly to confirm the use of correct and properly installed floor mats.

Parts Department

- Any Lexus All Weather Floor Mat (AWFM) in your inventory should be returned.
 - Dealers should prepare a PRR Claim listing the part numbers and quantities of each AWFM they are requesting to return. These claims should be submitted to the facing PDC using the normal method in Dealer Daily.
 - The return code for each part should be indicated as R-2, Manufacturing Defect.
 - When your dealership receives authorization from your facing PDC, please return the AWFMs immediately. The different AWFMs should be grouped by part number to assist the PDC in accurately accounting for the returned quantities.

If you are approached by the media, please direct them to Lexus Corporate Communications at 310-468-2552 or 310-468-4718. When you must speak to any media representatives, please reference the information weve provided previously on how to identify and properly install the correct floor mats, as well as your efforts to instruct owners about the importance of the proper installation of floor mats designed specifically for their vehicle.

Please direct any additional questions you may have to your Area representative so that we can continue to address your issues as we work through this experience together.

1. Click here to see Semi-Perm - Installation-Application Instructions - Lexus.pdf

2. Click here to see Semi-Permanent Floor Mat Installation Label 10-01-09.pdf

3. Click here to see FINAL Lexus Carpet Floor Mat Application Information Chart.pdf

Toyota and Lexus Carpeted / All-Weather Floor Mat Inspection, Application and Installation Instructions



A. General Floor Mat Warnings

- Only install floor mats designed specifically for that model and model year. Check for correct model name and part number on the packaging label to confirm vehicle application.
 - Never install a floor mat if you are uncertain of the model application.
 - Never install the floor mat upside down or turned over for any reason.
 - Only install the driver's floor mat in the driver's foot area.
- Always properly secure the driver's floor mat using the retaining hooks (clips) supplied in the bag with the floor mats (in the case of Lexus with the carpet floor mats). Follow the floor mat retention clip installation instruction supplied with the clips. If the mat is properly secured and you have confirmed vehicle applicability, it will not interfere with the accelerator pedal.
 - Never install the front driver's floor mat without all retaining hooks (clips) securing the mat firmly in place.
 - The retaining hooks (clips) are designed to accommodate only one floor mat at a time.
 - Do not install another floor mat(s) on top of an existing driver's floor mat.
- After installation, always check the operation of the accelerator, brake and clutch (if applicable) pedals to assure the floor mat does not interfere with them.
- Carefully read the warning tag attached to the driver's floor mat regarding installation.

B. Floor Mat Inspection Instructions and Application Information

- Before placing a floor mat in a vehicle be familiar with the procedure outlined below.
 - Identify the correct driver's floor mat for the specific vehicle application.
 - Correctly install the driver's floor mat.
- Regularly verify the correct floor mat is securely installed in the appropriate model using the retaining hooks (clips).

NOTE: Use the Application Information Chart provided or the Accessory Parts Catalog to verify mat-to-vehicle application.





- Check the following pedal operation (fully depress the pedal) to assure the floor mat does not interfere with it. Make sure the vehicle is turned off and in the "Park" position when testing:
 - Accelerator Pedal
 - Brake Pedal
 - Clutch Pedal (if equipped)
- Verify the driver's floor mat involved in SSC 70F & 7LB has been removed from your vehicle

	,, ,
DO NOT	USE THESE MATS
<u>SSC 70F Part Number:</u> PT908-32070-02 (Blk) PT908-32070-14 (Brn)	<u>SSC 7LB Part Number:</u> PT908-33070-02 OR PT908-33071-02 (Blk) PT908-33070-11 OR PT908-33071-11 (Gr) PT908-33070-14 OR PT908-33071-14 (Brn)

Toyota and Lexus Carpeted / All Weather Floor Mat Inspection, Application and Installation Instructions

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Toyota and Lexus Carpeted / All-Weather Floor Mat Inspection, Application and Installation Instructions



Read these important Warnings BEFORE installing ANY type of Floor Mat.

A. General Floor Mat Warnings

- Only install floor mats designed specifically for that model and model year. Check for correct model name and part number on the packaging label to confirm vehicle application.
 - Never install a floor mat if you are uncertain of the model application.
 - Never install the floor mat upside down or turned over for any reason.
 - o Only install the driver's floor mat in the driver's foot area.
- Always properly secure the driver's floor mat using the retaining hooks (clips) supplied in the bag with the floor mats (in the case of Lexus with the carpet floor mats). Follow the floor mat retention clip installation instruction supplied with the clips. If the mat is properly secured and you have confirmed vehicle applicability, it will not interfere with the accelerator pedal.
 - Never install the front driver's floor mat without all retaining hooks (clips) securing the mat firmly in place.
 - The retaining hooks (clips) are designed to accommodate only one floor mat at a time.
 - Do not install another floor mat(s) on top of an existing driver's floor mat.
- After installation, always check the operation of the accelerator, brake and clutch (if applicable) pedals to assure the floor mat does not interfere with them.
- Carefully read the warning tag attached to the driver's floor mat regarding installation.

B. Floor Mat Inspection Instructions and Application Information

- Before placing a floor mat in a vehicle be familiar with the procedure outlined below.
 - o Identify the correct driver's floor mat for the specific vehicle application.
 - Correctly install the driver's floor mat.
- Regularly verify the correct floor mat is securely installed in the appropriate model using the retaining hooks (clips).

NOTE: Use the Application Information Chart provided or the Accessory Parts Catalog to verify mat-to-vehicle application.



SSC 7LB Part Number:

PT908-33070-02 OR PT908-33071-02 (Blk)

PT908-33070-11 OR PT908-33071-11 (Gr)

PT908-33070-14 OR PT908-33071-14 (Brn) Toyota and Lexus Carpeted / All Weather Floor Mat Inspection, Application and Installation Instructions

SSC 70F Part Number:

PT908-32070-02 (Blk)

PT908-32070-14 (Brn)

DP09-001 Closing Resume



ODI RESUME

U S. Department of Transportation National Highway Traffic Safety Administration Investigation: DP09-001 Date Opened: 04/08/2009 Closing Date:10/29/2009 Principal Investigator: Stephen McHenry Subject: Unwanted and Unintended Acceleration

Manufacturer: Toyota Motor North America, Inc., Toyota Motor Corporation Products: 2007 Lexus ES350 and 2002-2003 Lexus ES300 Population: 230,517 (estimated)

Problem Description: Petition request for an investigation into unwanted and unintended acceleration not caused by accelerator pedal interference.

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*Description of Other: Number of incidents attributable to accelerator pedal interference

Action: This petition has been denied. Recall 09V-388	
Engineer: <u>Stephen McHenry</u> SMCH	Date: 10/29/2009
Div. Chief: <u>Jeffrey L. Quandt</u>	Date: 10/29/2009
Office Dir.: <u>Kathleen C. DeMeter</u>	Date: 10/29/2009

Summary: The Office of Defects Investigation (ODI) opened DP09-001 on April 8, 2009, to evaluate a defect petition requesting additional investigation of potential throttle control system defects unrelated to floor mat interference with accelerator pedals in model year (MY) 2007 Lexus ES350 vehicles. The petitioner referenced an earlier ODI investigation concerning floor mat interference with accelerator pedal return (PE07-016/EA07-010), which he stated was too narrow in scope as it did not include all incidents of unwanted acceleration and consider all potential causes of vehicle speed control concerns. The petition also requested an "investigation of MY 2002-2003 Lexus ES300 for those 'longer duration incidents involving uncontrollable acceleration where brake pedal application allegedly had no effect' that were determined not to be within the scope of investigation PE04-021." As background, the petitioner owns a MY 2007 Lexus ES350 that allegedly experienced an unwanted and uncontrolled acceleration event (ODI complaint number 10261660). Toyota concluded that the incident was caused by an unsecured floor mat.

To assess the petitioner's request, ODI interviewed the petitioner, inspected his vehicle, reviewed information submitted by Toyota, reviewed owner complaints alleging incidents of unwanted acceleration in the subject vehicles and material related to the investigations cited by the petitioner. ODI identified 64 complaints alleging incidents of unwanted acceleration in MY 2007 Lexus vehicles, resulting in 8 crashes and 15 injuries. ODI's analysis of these complaints determined that 50 (78%) involved incidents of floor mat interference, including 7 (88%) of the crashes and all 15 injuries. Therefore, ODI's analysis found that the only defect trend related to vehicle speed control in the subject vehicles involved the potential for accelerator pedals to become trapped near the floor by out-of-position or inappropriate floor mat installations.

On October 5, 2009, Toyota initiated a safety recall (Recall 09V-388) to address concerns with potential accelerator pedal entrapment by floor mats in approximately 3.8 million vehicles, including the subject vehicles. Except insofar as the petitioner's contentions relate to that recall, the factual bases of the petitioner's contentions that any further investigation is necessary are unsupported. In our view, additional investigation is unlikely to result in a finding that a defect related to motor vehicle safety exists or a NHTSA order for the notification and remedy of a safety-related defect, as alleged by the petitioner, at the conclusion of the requested investigation. Therefore, in view of the need to allocate and prioritize NHTSA's limited resources to best accomplish the agency's safety mission, the petition is denied. This action does not constitute a finding by NHTSA that a safety-related defect does not exist. The agency will take further action if warranted by future circumstances. Please see the Federal Register notice for further details.

DP09-001 DP09-001 INFORMATION, Denial and Federal Register



1200 New Jersey Avenue SE. Washington, DC 20590



NVS-213 DP09-001

Dear Mr.

This letter is in response to your petition requesting that the National Highway Traffic Safety Administration (NHTSA) conduct a defect investigation into (1) unwanted and unintended acceleration in model year (MY) 2007 Lexus ES350 vehicles, and (2) longer duration incidents of unintended acceleration where brake pedal application allegedly was ineffective in MY 2002 and 2003 Lexus ES300 vehicles.

We have evaluated your petition, and a summary of the evaluation is presented in the enclosed notice, which will be published in the <u>Federal Register</u>.

Based on our evaluation, it is unlikely that NHTSA would issue an order requiring the notification and remedy for either of the two aforementioned conditions in the vehicles you indicated. Toyota has recently issued a recall, 09V-388, for 3.8 million vehicles, including the MY 2007 Lexus ES350, to correct a condition wherein the accelerator pedals are trapped by floor mats.

Thank you for bringing this matter to our attention.

Sincerely,

Kathleen C. DeMeter Director Office of Defects Investigation

Enclosure: <u>Federal Register</u> Notice



DEPARTMENT OF TRANSPORTATION

National Highway Traffic Safety Administration Denial of Motor Vehicle Defect Petition

AGENCY: National Highway Traffic Safety Administration, (NHTSA), Department of Transportation

ACTION: Denial of a petition for a defect investigation.

SUMMARY: This notice sets forth the reasons for the denial of a petition (Defect Petition DP09-001) submitted by Mr. (petitioner) to the Administrator of NHTSA by a letter dated March 13, 2009, under 49 CFR part 552. The petitioner requests additional investigations of: (1) the unwanted and unintended acceleration of model year 2007 Lexus ES350 vehicles and (2) model years 2002-2003 Lexus ES300 for long duration incidents involving uncontrolled acceleration where brake pedal application had no effect.

After conducting a technical review of the material cited and provided by the petitioner, material contained within investigations cited by petitioner, information relevant to material cited by petitioner, and conducting interviews with complainants and manufacturer representatives, and taking into account several considerations, including, among others, a recent safety recall by Toyota (NHTSA Recall 09V-388), allocation of agency resources, agency priorities, and the likelihood that additional investigations would result in a finding that a defect related to motor vehicle safety exists, NHTSA has concluded that further investigation of the issues raised by the petition is not warranted. The agency accordingly has denied the petition.

FOR FURTHER INFORMATION CONTACT: Mr. Stephen McHenry, Vehicle Control Division, Office of Defects Investigation, NHTSA, 1200 New Jersey Avenue, SE, Washington, DC 20590. Telephone 202-366-0139. E-mail <u>stephen.mchenry@dot.gov</u>.

SUPPLEMENTARY INFORMATION:

I. INTRODUCTION

Interested persons may petition NHTSA requesting that the agency initiate an investigation to determine whether a motor vehicle or item of replacement equipment does not comply with an applicable motor vehicle safety standard or contains a defect that relates to motor vehicle safety. 49 CFR § 552.1. Upon receipt of a properly filed petition the agency conducts a technical review of the petition, material submitted with the petition, and any additional information. § 552.6. After considering the technical review and taking into account appropriate factors, which may include, among others, allocation of agency resources, agency priorities, and the likelihood of success in litigation that might arise from a determination of a noncompliance or a defect related to motor vehicle safety, the agency will grant or deny the petition. § 552.8.

II. DEFECT PETITION BACKGROUND INFORMATION

The petitioner, Mr. **1** of Plymouth, Minnesota, owns a model year (MY) 2007 Lexus ES350 (VIN JTHBJ46G072 . On March 12, 2009, Mr. **1** filed a complaint with NHTSA (ODI No. 10261660) alleging a "sudden and uncontrollable surge in acceleration" while driving home from work on February 3, 2009:

Driving home from work, I experienced a sudden uncontrollable surge in acceleration causing my speed to increase from about 60 mph to 80+ mph. Immediately I began to brake hard as I was rapidly approaching traffic just ahead of me. Fortunately the inside left lane was unoccupied and I was able to make an immediate lane change. Initially I depressed the brake pedal as hard as I could using both feet but only managed to slow the vehicle to 40-45 mph. With my speed reduced, I alternated between pumping the accelerator pedal and pulling up on it from the underside with my right foot as it became clear that the throttle was stuck in an open position. The vehicle continued to speed back up to over 65 mph with less pressure on the brake pedal.

With traffic just ahead of me, I moved over to the left shoulder next to the center barrier and continued to try to release the open throttle. There were clouds of smoke around the vehicle and the smell of burning materials from the overheating brakes. After finally getting the vehicle slowed down to about 25-30 mph, I shifted into "Neutral" and depressed the start/stop push button a number of times hoping to stop the engine but nothing happened. Instead the RPMs moved up into the redline range on the tachometer. I quickly shifted back into "Drive"; the vehicle jolted and rapidly accelerated to 60+ mph.

As the brakes were fading quickly, I was certain that I would need to shift back into "Neutral" and let the engine blow up to stop the vehicle. Suddenly the acceleration surge stopped and I was able to bring the vehicle to a stop about 1 ¹/₂ to 2 miles from where it had started. I quickly shifted into "Park" and depressed the start/stop push button to turn off the engine. The vehicle seemed to shutter as I did so. Upon restarting the car, I drove cautiously to Lexus of Wayzata a short distance away fully prepared to shift into "Neutral" if the acceleration repeated. The car remains there over 5 weeks later.

Following the incident, Mr. Submitted a complaint to Toyota and a claim to the Lexus Customer Satisfaction Department, requesting that Lexus repurchase his vehicle. According to Toyota, the Lexus dealer service technician who inspected Mr. Submitted vehicle after the incident observed that the driver's side floor mat retaining clips were not properly secured and "the floor mat was in a position where it could interfere with the operation and travel of the accelerator pedal."¹ Toyota denied Mr. claim on March 10, 2009, concluding that the event was caused by an out-of-position floor mat:^{2,3}

The inspection of your vehicle revealed no evidence of any vehicle defects or malfunction. The throttle assembly and accelerator pedal were operating as designed, with no binding or sticking of any of the components. The brakes showed signs of excessive wear which is consistent with what you described happened to you.

The inspection also revealed that the floor mat was in a position where it could interfere with the operation and travel of the accelerator pedal. When the vehicle was taken in to the dealership, the floor mat retaining clips were not properly secured which allowed the floor mat to move out of position. While we understand that you feel the floor mat was not the problem, the evidence revealed during our inspection showed otherwise.

On March 12, 2009, Mr. reported his initial complaint to NHTSA and on March 13, 2009, he sent a defect petition to NHTSA that was received by the Office of Defects Investigation (ODI) on March 19, 2009 (ODI No. 10263408). On May 1, 2009, ODI investigator Stephen McHenry and Vehicle Research Test Center engineer Mr. William Collins met with the petitioner at Lexus of Wayzata in Wayzata, Minnesota. Also in attendance was Mr. Mike Zarnecki, Field Technical Specialist from the Lexus Central Area Office in Naperville, Illinois.

¹ Chris Tinto, Toyota Motor North America, Inc., letter to Kathleen DeMeter, ODI, May 14, 2009, <u>Response to the</u> <u>Petition for a Defect Investigation Submitted by Jeffrey Pepski</u> (see public file for DP09-001).

² Troy Higa, Toyota Motor Sales, U.S.A., Inc., letter to March 10, 2009 (see public file for DP09-001).

³ The issue of accelerator pedal entrapment by an unsecured floor mat in the subject vehicles is addressed by Recall 09V-388.

The petitioner was interviewed and the petitioner's vehicle was test driven. No functional abnormalities were noted during the test drive. According to Mr. Zarnecki and notes from the dealership's work order, no fault codes were found in the vehicle's powertrain computer system. Toyota concluded that the incident was caused by an improperly installed floor mat.

The petition requests additional investigations of (1) unwanted and unintended acceleration in MY 2007 Lexus ES350 vehicles, previously investigated by ODI in PE07-016 and EA07-010; and (2) longer duration incidents of unintended acceleration where brake pedal application allegedly was ineffective in MY 2002 and 2003 Lexus ES300 vehicles, previously investigated by ODI in PE04-021.

The petitioner cites seven issues in support of the petition to investigate the MY 2007 Lexus ES350:

Issue #1.	Proper Party to Preliminary Evaluation PE07-016;
Issue #2.	Toyota's Response – Causes of Alleged Defect;
Issue #3.	Narrow Scope of Preliminary Evaluation PE07-016;
Issue #4.	Vehicle Certification Label – Compliance with Federal Safety Standard No. 124;
Issue #5.	Adequacy of Service Brakes;
Issue #6.	Ignition/Engine Switch; and
Issue #7.	ECM and ECUs – Lack of Inputs and Receipt of Contradictory Inputs.

The petitioner contends that expanding the investigation to include MY 2002 and 2003 Lexus ES300 vehicles is necessary because "reviewing all pertinent data across model years will better indicate the existence of any pattern."

III. ODI ANALYSIS OF THE PETITION REQUEST FOR ADDITIONAL INVESTIGATION OF MY 2007 LEXUS ES350 VEHICLES.

Background.

On March 29, 2007, ODI opened Preliminary Evaluation PE07-016 to investigate the potential for accessory all-weather floor mats sold by Toyota to interfere with the accelerator pedal in MY 2007 Lexus ES350 vehicles. The investigation was based on a thorough review of complaints involving unintended acceleration that identified five incidents that likely were caused by interference between Toyota's accessory all-weather floor mat and the accelerator pedal. ODI upgraded the investigation to Engineering Analysis EA07-010 on August 8, 2007, and expanded the population to include MY 2007 and 2008 Lexus ES, ES350, and Toyota Camry vehicles. At that time, ODI had identified 17 complaints related to floor mat interference with the accelerator pedal in the subject vehicles.

ODI closed the investigation on October 11, 2007, after Toyota decided to conduct a recall of the accessory all-weather floor mats. Toyota's recall provided for the replacement of the accessory all-weather floor mats with mats that were redesigned to reduce the potential for pedal interference in the event that they were installed incorrectly. When EA07-010 was closed, ODI was aware of 26 Vehicle Owner Questionnaires ("VOQs" or "complaints") concerning incidents of unwanted acceleration involving accessory all-weather floor mat interference in MY 2007 and 2008 Lexus ES, ES350, and Toyota Camry vehicles, including seven crashes. Twenty of the complaints involved MY 2007 Lexus ES350 vehicles.

The following summarizes the issues cited by the petitioner as the bases for opening the requested investigations and ODI's assessment of each issue.

Issue #1: Toyota's response to ODI's April 5, 2007, information request (IR) letter in PE07-016 "may have been limited in some manner" by the definition of "Toyota" used in the IR.

The petitioner contends that since ODI's April 7, 2007, letter to Toyota requesting information in support of PE07-016 defined "Toyota" as "Toyota Motor North America, Inc." rather than "Toyota Motor Corporation," Toyota's responses "may have been limited in some manner by the failure to properly address the appropriate parties to the investigation."

The petitioner's concern is unfounded. In a May 14, 2009, letter responding to Mr. Pepski's petition, Toyota confirmed that it "construed the request to apply to all Toyota entities, including the entities identified by Mr. **Mathematical Structure**, and that its earlier responses included all nonprivileged responsive information and documents in the possession of all of those Toyota entities."

Issue #2 and Issue #3: The Agency failed to investigate allegations of unwanted acceleration that were not related to improper installation of the accessory all-weather floor mats.

In Issue #2, the petitioner contends that NHTSA should have investigated incidents of unintended acceleration that it determined were unrelated to improper installation of the accessory all-weather floor mat. In Issue #3, the petitioner contends that the scope of PE07-016 should have been "broadened or increased for additional causes beyond the all-weather floor mats" based on (1) information submitted by Toyota in its June 11, 2007, letter responding to ODI's information request, (2) additional complaints received by ODI after PE07-016 was opened; and (3) the results of a survey conducted for ODI by NHTSA's Vehicle Research and Test Center (VRTC) which "identified vehicles without all-weather car mats experiencing

unintended acceleration." ODI interprets these issues as one in the same—an allegation that the Agency failed to investigate complaints by subject vehicle owners that petitioner claims are unrelated to the recalled accessory all-weather floor mats.

ODI reviewed each complaint submitted by Toyota in its response to the PE07-016 IR and identified a safety defect trend related to interference between the accessory all-weather floor mat and the accelerator pedal that could trap the pedal near the floor during certain accelerator pedal applications (e.g., hard pedal applications while passing slower traffic, accelerating into traffic, and/or accelerating up grades). ODI carefully analyzed that data during the prior investigation and again during the review of this petition, including detailed interviews of drivers and, in some cases, field investigations to inspect vehicles and incident scenes. ODI determined that floor mat interference was the condition warranting investigation based on frequency of occurrence and nature of the events.

The petitioner identified ten complaints as evidence that "<u>not</u> all these incidents are related to an accessory all weather floor mat entrapping the throttle pedal." These complaints are presented in Table 1. The petitioner contends that the complaints that have a number marked with an asterisk are "five other VOQs where floor mats were not involved in the unwanted acceleration."

Contrary to the petitioner's contention, six of the VOQs were related to floor mat interference (four of the five that petitioner singled out as unrelated to floor mats were related to floor mats). Three of the remaining four complaints involved incidents occurring during lowspeed close-quarter driving maneuvers—circumstances that are not similar to those complained of by petitioner; the other complaint does not indicate an unintended acceleration event.

Evidence of						
Floor Mat	ODI File					
Interference	Number	Description				
Yes	10199857*	Unsecured floor mat discovered and corrected during dealer				
		inspection. * All-weather accessory floor mat improperly "stacked" on top of carpet mat. 8 Unsecured floor mat slid forward and interfered with accelerator				
	10203221*					
	10218118					
		pedal return.				
	10223792	Passenger side floor mats improperly placed on driver side,				
		resulting in accelerator pedal interference.				
	10230560*	Floor mats were not returned to proper position after oil change,				
		resulting in accelerator pedal interference.				
	10230929*	All-weather accessory floor mat improperly "stacked" on top of				
		carpet mat.				
No	No 10192384 Single incident of alleged engine surge while parking i					
		No trouble found by dealer.				
	10218961	Driver concerned that vehicle accelerated more quickly than				
		expected when the accelerator pedal was depressed.				
	10219328	Single incident of alleged engine surge while parking vehicle. No				
		trouble found by dealer.				
	10226564*	Alleged idle flare when idling. Dealer reprogrammed transmission				
		control unit.				

Table 1. Ten VOQs Identified in the Petition as Evidence of Unintended Acceleration Experience <u>Not</u> Related to Floor Mats.

In addition to the analyses of the complaint and survey data, ODI and VRTC also

conducted design reviews and testing to evaluate the possibility of other potential causes of

unintended acceleration in the subject vehicles. Some of this work is summarized in the

following excerpt from the VRTC test report:⁴

The Vehicle Research and Test Center obtained a Lexus ES350 for testing. The vehicle was fully instrumented to monitor and acquire data relating to yaw rate, speed, acceleration, deceleration, brake pedal effort, brake line hydraulic pressure, brake pad temperature, engine vacuum, brake booster vacuum, throttle plate position, and accelerator pedal position. Multiple electrical signals were introduced into the electrical system to test the robustness of the electronics against single point failures due to electrical interference. The system proved to have multiple redundancies and showed no vulnerabilities to electrical signal activities. Magnetic fields were introduced in proximity to the throttle body and

⁴ VRTC Memorandum Report EA07-010, VRTC-DCD-7113, <u>2007 Lexus ES-350 Unintended Acceleration</u>, Section 3.1 Dynamic Vehicle Testing, April 30, 2008.

accelerator pedal potentiometers and did result in an increase in engine revolutions per minute (RPM) of up to approximately 1,000 RPM, similar to a cold-idle engine RPM level. Mechanical interferences at the throttle body caused the engine to shut down.

Petitioner's assertion that the Agency failed to investigate other causes of unintended acceleration and, as a result, may have failed to identify other causes of unintended acceleration is unsupported. Several complaints identified by the petitioner as unrelated to interference between the floor mat and accelerator pedal, in fact, involved this problem. We note that Toyota has initiated a safety recall program to address the potential for unwanted acceleration due to accelerator pedal entrapment by floor mats in approximately 3.8 million vehicles, including the subject vehicles. Analysis of the remaining complaints identified by the petitioner failed to identify a defect trend unrelated to this issue.

Issue #4: The subject vehicles do not comply with FMVSS No. 124.

The petitioner contends that the subject vehicles do not satisfy requirements of Federal Motor Vehicle Safety Standard (FMVSS) 124, Accelerator control systems. Specifically, the petitioner contends that the subject vehicles do not comply with paragraph S5.3, which requires the throttle to return to the idle position within one second, and paragraph S5.1, which requires at least two independent sources of energy capable of returning the throttle to the idle position within the time requirements of paragraph S5.3. The petitioner's concerns with the subject vehicles' compliance with FMVSS 124 are apparently based upon his belief that the rule requires a vehicle equipped with a throttle position or accelerator pedal position sensor that measures "any force/pressure to the driver-operated control or any release of the actuating force to the driver-operated control (i.e., accelerator pedal)."

As an initial matter, FMVSS 124 does not require a particular design to meet its requirements; it is a performance standard. It is the responsibility of a manufacturer of vehicles

and/or items of motor vehicle equipment to manufacture and sell vehicles that comply with applicable motor vehicle safety standards and to certify that each motor vehicle and/or equipment item is in complies with applicable FMVSSs. This is a self-certification process. This usually means testing by the manufacturer in accordance with the FMVSS to ensure that its vehicles and equipment comply with the FMVSS.

Petitioner's basis for this issue is unsupported as there is no indication that the subject vehicles are not fully compliant with FMVSS 124.⁵ Paragraph S5.3 does not mandate compliance with any specific design feature, including a throttle position or accelerator pedal position sensor. In its May 14, 2009, letter responding to Mr. Pepski's petition, Toyota states, "the throttle control system in the subject vehicles fully complies with the requirements of FMVSS No. 124, as demonstrated by tests conducted in the manner specified in the laboratory test procedure issued by NHTSA's Office of Vehicle Safety Compliance, TP-124-06 (April 20, 2000)." Regarding paragraph S5.1, the pedal assembly on the subject vehicles is biased to the "up," or idle, position by two independent springs.⁶ .

⁵ The petitioner maintains that, because of the alleged non-compliance with FMVSS 124 and Toyota's knowledge thereof, the Vehicle Certification label on all MY 2007 Lexus ES350 vehicles does not comply with §§ 30112(a)(1) and 30115(a) of Title 49 of the U.S. Code. As Toyota states in its May 14, 2009, letter, "[b]ecause the vehicles fully comply with the standard, …there is no merit to Mr. allegations that Toyota violated 49 U.S.C. § 30112(a) when it sold those vehicles, or that it violated 49 U.S.C. § 30115(a) when it certified them as complying with all applicable FMVSSs."

⁶ ODI notes that the petitioner's description of his attempts to "dislodge the throttle by alternatively pumping the accelerator pedal and pulling up on it from the underside" strongly suggest an accelerator pedal that is being physically "trapped" by some foreign object, such as the floor mat (in his case the original equipment carpet).

When ODI and VRTC investigators met with the petitioner and inspected his vehicle the accelerator pedal assembly was functioning properly and there were no anomalies noted in the return springs. Wear marks were noted at the leading edge of the front right edge of the carpet mat, which may have been an indication of contact between the mat and the bottom edge of the accelerator pedal. ODI confirmed that the pedal is such that it can be held down by the mat. Once trapped, the pedal can remain trapped after repeated efforts to "pump" the pedal.

Issue #5: The subject vehicles do not comply with FMVSS No. 135.

The petitioner questions whether the service brakes of the subject vehicles are capable of meeting the performance requirements of FMVSS 135, Light-vehicle brake systems, with a throttle that has been stuck in an open position. The petitioner interprets complaints received by ODI of instances where a subject vehicle operator was unable to prevent a vehicle with a stuck accelerator pedal from traveling a "significant distance" as a functional failure as defined in paragraph S4 of FMVSS 135. Petitioner contends that, due to the significant distances travelled by subject vehicles with stuck accelerator pedals, compliance with the stopping distance requirement under paragraph S7.11.4 of FMVSS 135 is "unlikely".

Petitioner's contentions regarding compliance with FMVSS 135 are without merit and there is no indication that the subject vehicles are not fully compliant with FMVSS 135. The stopping distance of a subject vehicle with a throttle stuck in an open position is irrelevant with respect to whether the vehicle is compliant with paragraph S7.11.4 of FMVSS 135. Pursuant to paragraph S7.11.2(b), the stopping distances required under paragraph S7.11.4 must be met by a vehicle with its transmission position in Neutral. The complaints referenced by the petitioner stem from incidences occurring on subject vehicles with a transmission position in drive.

Testing conducted by VRTC determined that the brake pedal force required to stop a subject vehicle with a wide open throttle was significantly greater than when the vehicle is operating with a closed throttle.

Significant brake pedal force in excess of 150 pounds was required to stop the vehicle, compared to 30 pounds required when the vehicle is operating normally. Stopping distances increased from less than 200 feet to more than 1,000 feet.⁷

⁷ VRTC Memorandum Report EA07-010, VRTC-DCD-7113, <u>2007 Lexus ES-350 Unintended Acceleration</u>, Section 3.3.1 Application of the brake, April 30, 2008.

Many of the incident drivers interviewed by ODI have stated that application of the brakes reduced acceleration but did not stop the vehicle. In assessing these complaints ODI notes that brake effectiveness in controlling a stuck open throttle event is significantly reduced once the vacuum reserve of the vacuum boosted power assist system is depleted. ⁸ The friction generated from brake application with the wheels driven by full engine power results in significant heating of the brake components. Continued operation in this mode causes degradation of the brake friction materials, further reducing brake effectiveness and the ability of the driver to control vehicle speed.

ODI notes that the petitioner confuses the Brake Assist system referenced in the Owner's Manual with the brake power assist system. Brake Assist is a computer controlled automobile braking technology that increases braking pressure in an emergency situation (e.g., crash avoidance braking). The Brake Assist technology used by Toyota in the subject vehicles detects an emergency situation by monitoring the rate of change of brake hydraulic pressure from the master cylinder. Based on the information gathered by ODI in interviews of incident drivers, there is no reason to believe that Brake Assist was activated during the unwanted acceleration events.⁹ While virtually all of the drivers indicated that they applied a great deal of force to the brake pedal in an effort to slow and stop the vehicle, it is possible that the manner (i.e., rate) in which the force was applied, or the absence of the amplifying vacuum boost, did not produce a brake system pressure pulse that is necessary to activate the Brake Assist system.

⁸ The petitioner also incorrectly interprets the loss of vacuum during operation at wide-open throttle as a "Functional Failure" of the brake power assist unit as defined in S4 of FMVSS 135. VRTC's testing demonstrates that the braking performance described by drivers of incident vehicles is consistent with open throttle braking with depleted vacuum in the vacuum boosted power assist system. Consequently, the petitioner's concerns with the adequacy of the service braking in the subject vehicles do not provide any basis for further investigation.

⁹ It is not possible to determine whether Brake Assist was activated for any length of time during any of the unwanted acceleration incidents ODI investigated in the subject vehicle population.

Issue #6: Operation of the subject vehicles' Ignition/Engine Switch poses a safety issue.

Petitioner contends that, according to the description of operation in the subject vehicle Owner's Manual, the engine cannot be switched off during an unintended acceleration event as the vehicle is not in Park.¹⁰ Petitioner contends further that if the engine *can* be switched off during an unintended acceleration event, doing so would lock the steering wheel and move it up and away from the driver.¹¹ The petitioner concludes that "the inability to turn off the engine in a safe manner is a significant safety issue with this 'push button' ignition issue."

The petitioner is incorrect in his description of the function of the ignition switch and steering column safety features. The engine can be turned off while in motion by pressing and holding the ignition push-button start/stop switch for at least three seconds. The press and hold function is meant to avoid inadvertent engine shut-off while in motion. Turning of the engine in this manner puts the vehicle electrical system in Accessory ("ACC") mode, in which the steering wheel does not lock or retract (as opposed to putting the vehicle in "OFF" mode, which can only occur when the vehicle is in Park).¹²

Issue #7: Contradictory sensor data logic should resolve on the side of safety.

The petitioner posits that "contradictory sensor data (e.g., open throttle and sustained extreme brake pressure) should error on the side of caution and safety." The petitioner correctly

¹⁰ Petitioner cites the following language to support this claim: "The engine cannot be switched to OFF unless the shift lever is in P." Toyota has indicated that this should be changed to the <u>vehicle</u> cannot be switched OFF until the shift lever is in Park."

¹¹ Petitioner references the following language: "When the engine switch is turned OFF, the steering wheel returns to its stowed position by moving up and away to enable easier driver entry and exit. Switching to ACC or IG-ON mode will return the steering wheel to the original position."

¹² It its May 14, 2009, letter, Toyota admits that in its description of the function of these features, even though "technically correct," is confusing. Toyota states that it plans to revise this portion of the manual to address any confusion.

notes that the subject vehicles throttle control logic does not change with brake application. However, while in certain circumstances it may be desirable for the vehicle throttle control system to respond to simultaneous applications of brake and accelerator pedals by prioritizing the braking command and limiting throttle opening, the absence of this function in the Toyota designs does not render the vehicles noncompliant with any applicable FMVSS and further investigation at this time is not likely to result in identification of a defect trend.

Current VOQ Status. The petitioner states that at the time the petition was sent there were "at least 45 VOQs on record with respect to vehicle speed control involving unwanted acceleration in MY 2007 Lexus ES350." Table 2 provides a breakdown of complaints to ODI relating to unintended acceleration in MY 2007 Lexus ES350 vehicles by category and date of receipt relative to completion of the prior investigation.

Analysis of the VOQs cited by the petitioner do not indicate a defect trend other than that involving the accelerator pedal as held down by a floor mat. The complaints ODI deemed related to floor mat interference outnumbered all other reports of alleged sudden and uncontrollable surge in acceleration reported during and subsequent to the ODI investigation. As previously noted, Toyota has initiated a safety recall to address the potential for unwanted acceleration due to accelerator pedal entrapment by floor mats in approximately 3.8 million vehicles, including the subject vehicles.

	Prior to EA07-010	Since EA07-010	
Unintended acceleration category	closing	closing	Total
Floor mat interference:			
- Recalled accessory all-weather mats	22	11	33
- Other floor mats	3	9	12
- Consistent with mat interference	1	4	5
(mat unknown)			
Subtotal, floor mat interference	26	24	50
Other:			
- Transmission shift quality	-	3	3
- Parking lot type maneuvers	2	6	8
- Throttle response	-	1	1
- Cruise control sensitivity	1	-	1
- Other	-	1	1
Subtotal, other	3	11	14
Total	29	35	64

Table 2. Vehicle Owner Questionnaires to ODI Related to Unintended Acceleration Incidents in MY 2007 Lexus ES350 Vehicles.

IV. ODI ANALYSIS OF THE PETITION REQUEST FOR AN INVESTIGATION OF

MY 2002 THROUGH 2003 LEXUS ES300 VEHICLES

Petitioner requests that ODI investigate MY 2002 through 2003 Lexus ES300 vehicles for complaints related to the petition for MY 2007 Lexus ES350 vehicles. Petitioner cites an earlier ODI investigation, PE04-021, during which 26 complaints initially considered by the Agency as part of that investigation later were determined to be outside the scope of that investigation. Petitioner states, "Reviewing all pertinent data across model years will better indicate the existence of any pattern."

On March 3, 2004, ODI opened Preliminary Evaluation PE04-021 to investigate allegations of vehicle surge during low speed driving maneuvers (such as parking) in MY 2002 through 2003 Toyota Camry, Camry Solara, and Lexus ES300 vehicles (approximately 980,000 vehicles). ODI opened PE04-021 based on owner reports alleging either an engine speed increase occurring without pressing on the accelerator pedal or the engine speed failing to decrease when the accelerator pedal was released. When PE04-021 was opened, ODI counted 37 complaints, including 30 reported crashes and 5 alleged injuries, potentially related to the alleged defect.

Upon further investigation, ODI determined that 26 of the 37 complaints fell outside the scope of PE04-021. ODI determined that these complaints related to longer duration incidents involving uncontrollable acceleration where brake pedal application allegedly had no effect and thus were not within the scope of the investigation. The investigation focused on incidents where the subject vehicle throttle control system opened the throttle valve without driver intent. ODI believed that the resultant vehicle surge could result in a momentary loss of vehicle control, often resulting in crashes of varying severity as the drivers were unable to react in time to apply the brakes effectively.

None of the complaints identified by the petitioner and received by ODI would fall within the scope of the investigation requested by the petitioner, nor do they indicate a defect trend unrelated to the accelerator pedal. In consideration of Mr. **1990** petition, ODI conducted a review of the 26 VOQs it determined outside the scope of PE04-021 as well as any other MY 2002-2003 Lexus ES300 VOQ received by ODI from the time of the opening of PE04-021 to the receipt of Mr. **1990** petition. Of the 26 VOQs outside the scope of PE04-021, only 2 involved MY 2002-2003 ES300 vehicles (VOQ 10032815 and 8017143).¹³ Neither of these VOQs involved longer duration incidents of unintended acceleration where brake pedal

¹³ VOQ 10032815 states that a MY 2002 ES300 was pulling into a parking space at less than 10 miles per hour when the car suddenly accelerated. VOQ 8017143 states that a MY 2002 ES300 was pulling into a parking space with the driver's foot on the brake when it suddenly accelerated and hit a tree. It also noted that while driving with the cruise control on the driver tapped the brakes to disengage the cruise control and the vehicle suddenly accelerated.

application allegedly was ineffective in MY 2002 and 2003 Lexus ES300 vehicles. Likewise, none of the remaining VOQs reviewed by ODI in response to Mr.

V. CONCLUSION

Toyota has initiated a safety recall (Recall 09V-388) to address concerns with potential accelerator pedal entrapment by floor mats in approximately 3.8 million vehicles, including the subject vehicles. Except insofar as the petitioner's contentions relate to that recall, the factual bases of the petitioner's contentions that any further investigation is necessary are unsupported. In our view, additional investigation is unlikely to result in a finding that a defect related to motor vehicle safety exists or a NHTSA order for the notification and remedy of a safety-related defect as alleged by the petitioner at the conclusion of the requested investigation. Therefore, in view of the need to allocate and prioritize NHTSA's limited resources to best accomplish the agency's safety mission, the petition is denied. This action does not constitute a finding by NHTSA that a safety-related defect does not exist. The agency will take further action if warranted by future circumstances.

Authority: 49 U.S.C. 30162(d); delegations of authority at CFR 1.50 and 501.8.

Issued on:

Kathleen C. DeMeter Director Office of Defects Investigation

Billing Code 4910-59-P

DEPARTMENT OF TRANSPORTATION

National Highway Traffic Safety Administration Denial of Motor Vehicle Defect Petition

AGENCY: National Highway Traffic Safety Administration, (NHTSA), Department of Transportation

ACTION: Denial of a petition for a defect investigation.

SUMMARY: This notice sets forth the reasons for the denial of a petition (Defect Petition DP09-001) submitted by Mr. **Constitution of the Administrator of NHTSA by a** letter dated March 13, 2009, under 49 CFR part 552. The petitioner requests additional investigations of: (1) the unwanted and unintended acceleration of model year 2007 Lexus ES350 vehicles and (2) model years 2002-2003 Lexus ES300 for long duration incidents involving uncontrolled acceleration where brake pedal application had no effect.

After conducting a technical review of the material cited and provided by the petitioner, material contained within investigations cited by petitioner, information relevant to material cited by petitioner, and conducting interviews with complainants and manufacturer representatives, and taking into account several considerations, including, among others, a recent safety recall by Toyota (NHTSA Recall 09V-388), allocation of agency resources, agency priorities, and the likelihood that additional investigations would result in a finding that a defect related to motor vehicle safety exists, NHTSA has concluded that further investigation of the issues raised by the petition is not warranted. The agency accordingly has denied the petition. **FOR FURTHER INFORMATION CONTACT:** Mr. Stephen McHenry, Vehicle Control Division, Office of Defects Investigation, NHTSA, 1200 New Jersey Avenue, SE, Washington, DC 20590. Telephone 202-366-0139. E-mail <u>stephen.mchenry@dot.gov</u>.

SUPPLEMENTARY INFORMATION:

I. INTRODUCTION

Interested persons may petition NHTSA requesting that the agency initiate an investigation to determine whether a motor vehicle or item of replacement equipment does not comply with an applicable motor vehicle safety standard or contains a defect that relates to motor vehicle safety. 49 CFR § 552.1. Upon receipt of a properly filed petition the agency conducts a technical review of the petition, material submitted with the petition, and any additional information. § 552.6. After considering the technical review and taking into account appropriate factors, which may include, among others, allocation of agency resources, agency priorities, and the likelihood of success in litigation that might arise from a determination of a noncompliance or a defect related to motor vehicle safety, the agency will grant or deny the petition. § 552.8.

II. DEFECT PETITION BACKGROUND INFORMATION

The petitioner, Mr. Jeffrey Pepski of Plymouth, Minnesota, owns a model year (MY) 2007 Lexus ES350 (VIN JTHBJ46G072131671). On March 12, 2009, Mr. filed a complaint with NHTSA (ODI No. 10261660) alleging a "sudden and uncontrollable surge in acceleration" while driving home from work on February 3, 2009:

Driving home from work, I experienced a sudden uncontrollable surge in acceleration causing my speed to increase from about 60 mph to 80+ mph. Immediately I began to brake hard as I was rapidly approaching traffic just ahead of me. Fortunately the inside left lane was unoccupied and I was able to make an immediate lane change. Initially I depressed the brake pedal as hard as I could using both feet but only managed to slow the vehicle to 40-45 mph. With my speed reduced, I alternated between pumping the accelerator pedal and pulling up on it from the underside with my right foot as it became clear that the throttle was stuck in an open position. The vehicle continued to speed back up to over 65 mph with less pressure on the brake pedal.

With traffic just ahead of me, I moved over to the left shoulder next to the center barrier and continued to try to release the open throttle. There were clouds of smoke around the vehicle and the smell of burning materials from the overheating brakes. After finally getting the vehicle slowed down to about 25-30 mph, I shifted into "Neutral" and depressed the start/stop push button a number of times hoping to stop the engine but nothing happened. Instead the RPMs moved up into the redline range on the tachometer. I quickly shifted back into "Drive"; the vehicle jolted and rapidly accelerated to 60+ mph.

As the brakes were fading quickly, I was certain that I would need to shift back into "Neutral" and let the engine blow up to stop the vehicle. Suddenly the acceleration surge stopped and I was able to bring the vehicle to a stop about 1 ½ to 2 miles from where it had started. I quickly shifted into "Park" and depressed the start/stop push button to turn off the engine. The vehicle seemed to shutter as I did so. Upon restarting the car, I drove cautiously to Lexus of Wayzata a short distance away fully prepared to shift into "Neutral" if the acceleration repeated. The car remains there over 5 weeks later.

Following the incident, Mr. submitted a complaint to Toyota and a claim to the Lexus Customer Satisfaction Department, requesting that Lexus repurchase his vehicle. According to Toyota, the Lexus dealer service technician who inspected Mr. wehicle after the incident observed that the driver's side floor mat retaining clips were not properly secured and "the floor mat was in a position where it could interfere with the operation and travel of the accelerator pedal."¹ Toyota denied Mr. Claim on March 10, 2009, concluding that the event was caused by an out-of-position floor mat:^{2,3}

The inspection of your vehicle revealed no evidence of any vehicle defects or malfunction. The throttle assembly and accelerator pedal were operating as designed, with no binding or sticking of any of the components. The brakes showed signs of excessive wear which is consistent with what you described happened to you.

The inspection also revealed that the floor mat was in a position where it could interfere with the operation and travel of the accelerator pedal. When the vehicle was taken in to the dealership, the floor mat retaining clips were not properly secured which allowed the floor mat to move out of position. While we understand that you feel the floor mat was not the problem, the evidence revealed during our inspection showed otherwise.

On March 12, 2009, Mr. reported his initial complaint to NHTSA and on March 13, 2009, he sent a defect petition to NHTSA that was received by the Office of Defects Investigation (ODI) on March 19, 2009 (ODI No. 10263408). On May 1, 2009, ODI investigator Stephen McHenry and Vehicle Research Test Center engineer Mr. William Collins met with the petitioner at Lexus of Wayzata in Wayzata, Minnesota. Also in attendance was Mr. Mike Zarnecki, Field Technical Specialist from the Lexus Central Area Office in Naperville, Illinois.

¹ Chris Tinto, Toyota Motor North America, Inc., letter to Kathleen DeMeter, ODI, May 14, 2009, <u>Response to the</u> <u>Petition for a Defect Investigation Submitted by</u> (see public file for DP09-001).

² Troy Higa, Toyota Motor Sales, U.S.A., Inc., letter to Jeff Pepski, March 10, 2009 (see public file for DP09-001).

 $^{^{3}}$ The issue of accelerator pedal entrapment by an unsecured floor mat in the subject vehicles is addressed by Recall 09V-388.
The petitioner was interviewed and the petitioner's vehicle was test driven. No functional abnormalities were noted during the test drive. According to Mr. Zarnecki and notes from the dealership's work order, no fault codes were found in the vehicle's powertrain computer system. Toyota concluded that the incident was caused by an improperly installed floor mat.

The petition requests additional investigations of (1) unwanted and unintended acceleration in MY 2007 Lexus ES350 vehicles, previously investigated by ODI in PE07-016 and EA07-010; and (2) longer duration incidents of unintended acceleration where brake pedal application allegedly was ineffective in MY 2002 and 2003 Lexus ES300 vehicles, previously investigated by ODI in PE04-021.

The petitioner cites seven issues in support of the petition to investigate the MY 2007 Lexus ES350:

Issue #1.	Proper Party to Preliminary Evaluation PE07-016;
Issue #2.	Toyota's Response – Causes of Alleged Defect;
Issue #3.	Narrow Scope of Preliminary Evaluation PE07-016;
Issue #4.	Vehicle Certification Label – Compliance with Federal Safety Standard No. 124;
Issue #5.	Adequacy of Service Brakes;
Issue #6.	Ignition/Engine Switch; and
Issue #7.	ECM and ECUs – Lack of Inputs and Receipt of Contradictory Inputs.

The petitioner contends that expanding the investigation to include MY 2002 and 2003 Lexus ES300 vehicles is necessary because "reviewing all pertinent data across model years will better indicate the existence of any pattern."

III. ODI ANALYSIS OF THE PETITION REQUEST FOR ADDITIONAL INVESTIGATION OF MY 2007 LEXUS ES350 VEHICLES.

Background.

On March 29, 2007, ODI opened Preliminary Evaluation PE07-016 to investigate the potential for accessory all-weather floor mats sold by Toyota to interfere with the accelerator pedal in MY 2007 Lexus ES350 vehicles. The investigation was based on a thorough review of complaints involving unintended acceleration that identified five incidents that likely were caused by interference between Toyota's accessory all-weather floor mat and the accelerator pedal. ODI upgraded the investigation to Engineering Analysis EA07-010 on August 8, 2007, and expanded the population to include MY 2007 and 2008 Lexus ES, ES350, and Toyota Camry vehicles. At that time, ODI had identified 17 complaints related to floor mat interference with the accelerator pedal in the subject vehicles.

ODI closed the investigation on October 11, 2007, after Toyota decided to conduct a recall of the accessory all-weather floor mats. Toyota's recall provided for the replacement of the accessory all-weather floor mats with mats that were redesigned to reduce the potential for pedal interference in the event that they were installed incorrectly. When EA07-010 was closed, ODI was aware of 26 Vehicle Owner Questionnaires ("VOQs" or "complaints") concerning incidents of unwanted acceleration involving accessory all-weather floor mat interference in MY 2007 and 2008 Lexus ES, ES350, and Toyota Camry vehicles, including seven crashes. Twenty of the complaints involved MY 2007 Lexus ES350 vehicles.

The following summarizes the issues cited by the petitioner as the bases for opening the requested investigations and ODI's assessment of each issue.

Issue #1: Toyota's response to ODI's April 5, 2007, information request (IR) letter in PE07-016 "may have been limited in some manner" by the definition of "Toyota" used in the IR.

The petitioner contends that since ODI's April 7, 2007, letter to Toyota requesting information in support of PE07-016 defined "Toyota" as "Toyota Motor North America, Inc." rather than "Toyota Motor Corporation," Toyota's responses "may have been limited in some manner by the failure to properly address the appropriate parties to the investigation."

The petitioner's concern is unfounded. In a May 14, 2009, letter responding to Mr. petition, Toyota confirmed that it "construed the request to apply to all Toyota entities, including the entities identified by Mr. **Second** and that its earlier responses included all nonprivileged responsive information and documents in the possession of all of those Toyota entities."

Issue #2 and Issue #3: The Agency failed to investigate allegations of unwanted acceleration that were not related to improper installation of the accessory all-weather floor mats.

In Issue #2, the petitioner contends that NHTSA should have investigated incidents of unintended acceleration that it determined were unrelated to improper installation of the accessory all-weather floor mat. In Issue #3, the petitioner contends that the scope of PE07-016 should have been "broadened or increased for additional causes beyond the all-weather floor mats" based on (1) information submitted by Toyota in its June 11, 2007, letter responding to ODI's information request, (2) additional complaints received by ODI after PE07-016 was opened; and (3) the results of a survey conducted for ODI by NHTSA's Vehicle Research and Test Center (VRTC) which "identified vehicles without all-weather car mats experiencing

unintended acceleration." ODI interprets these issues as one in the same—an allegation that the Agency failed to investigate complaints by subject vehicle owners that petitioner claims are unrelated to the recalled accessory all-weather floor mats.

ODI reviewed each complaint submitted by Toyota in its response to the PE07-016 IR and identified a safety defect trend related to interference between the accessory all-weather floor mat and the accelerator pedal that could trap the pedal near the floor during certain accelerator pedal applications (e.g., hard pedal applications while passing slower traffic, accelerating into traffic, and/or accelerating up grades). ODI carefully analyzed that data during the prior investigation and again during the review of this petition, including detailed interviews of drivers and, in some cases, field investigations to inspect vehicles and incident scenes. ODI determined that floor mat interference was the condition warranting investigation based on frequency of occurrence and nature of the events.

The petitioner identified ten complaints as evidence that "<u>not</u> all these incidents are related to an accessory all weather floor mat entrapping the throttle pedal." These complaints are presented in Table 1. The petitioner contends that the complaints that have a number marked with an asterisk are "five other VOQs where floor mats were not involved in the unwanted acceleration."

Contrary to the petitioner's contention, six of the VOQs were related to floor mat interference (four of the five that petitioner singled out as unrelated to floor mats were related to floor mats). Three of the remaining four complaints involved incidents occurring during lowspeed close-quarter driving maneuvers—circumstances that are not similar to those complained of by petitioner; the other complaint does not indicate an unintended acceleration event.

Evidence of				
Floor Mat	ODI File			
Interformed	Number			
Interterence	Number	Description		
Yes	10199857*	Unsecured floor mat discovered and corrected during dealer inspection.		
	10203221*	All-weather accessory floor mat improperly "stacked" on top of carpet mat.		
	10218118	Unsecured floor mat slid forward and interfered with accelerator pedal return.		
	10223792	Passenger side floor mats improperly placed on driver side, resulting in accelerator pedal interference.		
	10230560*	Floor mats were not returned to proper position after oil change, resulting in accelerator pedal interference.		
	10230929*	All-weather accessory floor mat improperly "stacked" on top of carpet mat.		
No	10192384	Single incident of alleged engine surge while parking in garage. No trouble found by dealer.		
	10218961	Driver concerned that vehicle accelerated more quickly than expected when the accelerator pedal was depressed.		
	10219328	Single incident of alleged engine surge while parking vehicle. No trouble found by dealer.		
	10226564*	Alleged idle flare when idling. Dealer reprogrammed transmission control unit.		

Table 1. Ten VOQs Identified in the Petition as Evidence of Unintended Acceleration Experience Not Related to Floor Mats.

In addition to the analyses of the complaint and survey data, ODI and VRTC also

conducted design reviews and testing to evaluate the possibility of other potential causes of

unintended acceleration in the subject vehicles. Some of this work is summarized in the

following excerpt from the VRTC test report:⁴

The Vehicle Research and Test Center obtained a Lexus ES350 for testing. The vehicle was fully instrumented to monitor and acquire data relating to yaw rate, speed, acceleration, deceleration, brake pedal effort, brake line hydraulic pressure, brake pad temperature, engine vacuum, brake booster vacuum, throttle plate position, and accelerator pedal position. Multiple electrical signals were introduced into the electrical system to test the robustness of the electronics against single point failures due to electrical interference. The system proved to have multiple redundancies and showed no vulnerabilities to electrical signal activities. Magnetic fields were introduced in proximity to the throttle body and

⁴ VRTC Memorandum Report EA07-010, VRTC-DCD-7113, <u>2007 Lexus ES-350 Unintended Acceleration</u>, Section 3.1 Dynamic Vehicle Testing, April 30, 2008.

accelerator pedal potentiometers and did result in an increase in engine revolutions per minute (RPM) of up to approximately 1,000 RPM, similar to a cold-idle engine RPM level. Mechanical interferences at the throttle body caused the engine to shut down.

Petitioner's assertion that the Agency failed to investigate other causes of unintended acceleration and, as a result, may have failed to identify other causes of unintended acceleration is unsupported. Several complaints identified by the petitioner as unrelated to interference between the floor mat and accelerator pedal, in fact, involved this problem. We note that Toyota has initiated a safety recall program to address the potential for unwanted acceleration due to accelerator pedal entrapment by floor mats in approximately 3.8 million vehicles, including the subject vehicles. Analysis of the remaining complaints identified by the petitioner failed to identify a defect trend unrelated to this issue.

Issue #4: The subject vehicles do not comply with FMVSS No. 124.

The petitioner contends that the subject vehicles do not satisfy requirements of Federal Motor Vehicle Safety Standard (FMVSS) 124, Accelerator control systems. Specifically, the petitioner contends that the subject vehicles do not comply with paragraph S5.3, which requires the throttle to return to the idle position within one second, and paragraph S5.1, which requires at least two independent sources of energy capable of returning the throttle to the idle position within the time requirements of paragraph S5.3. The petitioner's concerns with the subject vehicles' compliance with FMVSS 124 are apparently based upon his belief that the rule requires a vehicle equipped with a throttle position or accelerator pedal position sensor that measures "any force/pressure to the driver-operated control or any release of the actuating force to the driver-operated control (i.e., accelerator pedal)."

As an initial matter, FMVSS 124 does not require a particular design to meet its requirements; it is a performance standard. It is the responsibility of a manufacturer of vehicles

and/or items of motor vehicle equipment to manufacture and sell vehicles that comply with applicable motor vehicle safety standards and to certify that each motor vehicle and/or equipment item is in complies with applicable FMVSSs. This is a self-certification process. This usually means testing by the manufacturer in accordance with the FMVSS to ensure that its vehicles and equipment comply with the FMVSS.

Petitioner's basis for this issue is unsupported as there is no indication that the subject vehicles are not fully compliant with FMVSS 124.⁵ Paragraph S5.3 does not mandate compliance with any specific design feature, including a throttle position or accelerator pedal position sensor. In its May 14, 2009, letter responding to Mr. **The subject of the subject vehicles fully complies with the requirements of FMVSS No. 124, as demonstrated by tests conducted in the manner specified in the laboratory test procedure issued by NHTSA's Office of Vehicle Safety Compliance, TP-124-06 (April 20, 2000)." Regarding paragraph S5.1, the pedal assembly on the subject vehicles is biased to the "up," or idle, position by two independent springs.⁶ .**

⁵ The petitioner maintains that, because of the alleged non-compliance with FMVSS 124 and Toyota's knowledge thereof, the Vehicle Certification label on all MY 2007 Lexus ES350 vehicles does not comply with §§ 30112(a)(1) and 30115(a) of Title 49 of the U.S. Code. As Toyota states in its May 14, 2009, letter, "[b]ecause the vehicles fully comply with the standard, ...there is no merit to Mr. **Mathematical** allegations that Toyota violated 49 U.S.C. § 30112(a) when it sold those vehicles, or that it violated 49 U.S.C. § 30115(a) when it certified them as complying with all applicable FMVSSs."

⁶ ODI notes that the petitioner's description of his attempts to "dislodge the throttle by alternatively pumping the accelerator pedal and pulling up on it from the underside" strongly suggest an accelerator pedal that is being physically "trapped" by some foreign object, such as the floor mat (in his case the original equipment carpet).

When ODI and VRTC investigators met with the petitioner and inspected his vehicle the accelerator pedal assembly was functioning properly and there were no anomalies noted in the return springs. Wear marks were noted at the leading edge of the front right edge of the carpet mat, which may have been an indication of contact between the mat and the bottom edge of the accelerator pedal. ODI confirmed that the pedal is such that it can be held down by the mat. Once trapped, the pedal can remain trapped after repeated efforts to "pump" the pedal.

Issue #5: The subject vehicles do not comply with FMVSS No. 135.

The petitioner questions whether the service brakes of the subject vehicles are capable of meeting the performance requirements of FMVSS 135, Light-vehicle brake systems, with a throttle that has been stuck in an open position. The petitioner interprets complaints received by ODI of instances where a subject vehicle operator was unable to prevent a vehicle with a stuck accelerator pedal from traveling a "significant distance" as a functional failure as defined in paragraph S4 of FMVSS 135. Petitioner contends that, due to the significant distances travelled by subject vehicles with stuck accelerator pedals, compliance with the stopping distance requirement under paragraph S7.11.4 of FMVSS 135 is "unlikely".

Petitioner's contentions regarding compliance with FMVSS 135 are without merit and there is no indication that the subject vehicles are not fully compliant with FMVSS 135. The stopping distance of a subject vehicle with a throttle stuck in an open position is irrelevant with respect to whether the vehicle is compliant with paragraph S7.11.4 of FMVSS 135. Pursuant to paragraph S7.11.2(b), the stopping distances required under paragraph S7.11.4 must be met by a vehicle with its transmission position in Neutral. The complaints referenced by the petitioner stem from incidences occurring on subject vehicles with a transmission position in drive.

Testing conducted by VRTC determined that the brake pedal force required to stop a subject vehicle with a wide open throttle was significantly greater than when the vehicle is operating with a closed throttle.

Significant brake pedal force in excess of 150 pounds was required to stop the vehicle, compared to 30 pounds required when the vehicle is operating normally. Stopping distances increased from less than 200 feet to more than 1,000 feet.⁷

⁷ VRTC Memorandum Report EA07-010, VRTC-DCD-7113, <u>2007 Lexus ES-350 Unintended Acceleration</u>, Section 3.3.1 Application of the brake, April 30, 2008.

Many of the incident drivers interviewed by ODI have stated that application of the brakes reduced acceleration but did not stop the vehicle. In assessing these complaints ODI notes that brake effectiveness in controlling a stuck open throttle event is significantly reduced once the vacuum reserve of the vacuum boosted power assist system is depleted. ⁸ The friction generated from brake application with the wheels driven by full engine power results in significant heating of the brake components. Continued operation in this mode causes degradation of the brake friction materials, further reducing brake effectiveness and the ability of the driver to control vehicle speed.

ODI notes that the petitioner confuses the Brake Assist system referenced in the Owner's Manual with the brake power assist system. Brake Assist is a computer controlled automobile braking technology that increases braking pressure in an emergency situation (e.g., crash avoidance braking). The Brake Assist technology used by Toyota in the subject vehicles detects an emergency situation by monitoring the rate of change of brake hydraulic pressure from the master cylinder. Based on the information gathered by ODI in interviews of incident drivers, there is no reason to believe that Brake Assist was activated during the unwanted acceleration events.⁹ While virtually all of the drivers indicated that they applied a great deal of force to the brake pedal in an effort to slow and stop the vehicle, it is possible that the manner (i.e., rate) in which the force was applied, or the absence of the amplifying vacuum boost, did not produce a brake system pressure pulse that is necessary to activate the Brake Assist system.

⁸ The petitioner also incorrectly interprets the loss of vacuum during operation at wide-open throttle as a "Functional Failure" of the brake power assist unit as defined in S4 of FMVSS 135. VRTC's testing demonstrates that the braking performance described by drivers of incident vehicles is consistent with open throttle braking with depleted vacuum in the vacuum boosted power assist system. Consequently, the petitioner's concerns with the adequacy of the service braking in the subject vehicles do not provide any basis for further investigation.

⁹ It is not possible to determine whether Brake Assist was activated for any length of time during any of the unwanted acceleration incidents ODI investigated in the subject vehicle population.

Issue #6: Operation of the subject vehicles' Ignition/Engine Switch poses a safety issue.

Petitioner contends that, according to the description of operation in the subject vehicle Owner's Manual, the engine cannot be switched off during an unintended acceleration event as the vehicle is not in Park.¹⁰ Petitioner contends further that if the engine *can* be switched off during an unintended acceleration event, doing so would lock the steering wheel and move it up and away from the driver.¹¹ The petitioner concludes that "the inability to turn off the engine in a safe manner is a significant safety issue with this 'push button' ignition issue."

The petitioner is incorrect in his description of the function of the ignition switch and steering column safety features. The engine can be turned off while in motion by pressing and holding the ignition push-button start/stop switch for at least three seconds. The press and hold function is meant to avoid inadvertent engine shut-off while in motion. Turning of the engine in this manner puts the vehicle electrical system in Accessory ("ACC") mode, in which the steering wheel does not lock or retract (as opposed to putting the vehicle in "OFF" mode, which can only occur when the vehicle is in Park).¹²

Issue #7: Contradictory sensor data logic should resolve on the side of safety.

The petitioner posits that "contradictory sensor data (e.g., open throttle and sustained extreme brake pressure) should error on the side of caution and safety." The petitioner correctly

¹⁰ Petitioner cites the following language to support this claim: "The engine cannot be switched to OFF unless the shift lever is in P." Toyota has indicated that this should be changed to the <u>vehicle</u> cannot be switched OFF until the shift lever is in Park."

¹¹ Petitioner references the following language: "When the engine switch is turned OFF, the steering wheel returns to its stowed position by moving up and away to enable easier driver entry and exit. Switching to ACC or IG-ON mode will return the steering wheel to the original position."

¹² It its May 14, 2009, letter, Toyota admits that in its description of the function of these features, even though "technically correct," is confusing. Toyota states that it plans to revise this portion of the manual to address any confusion.

notes that the subject vehicles throttle control logic does not change with brake application. However, while in certain circumstances it may be desirable for the vehicle throttle control system to respond to simultaneous applications of brake and accelerator pedals by prioritizing the braking command and limiting throttle opening, the absence of this function in the Toyota designs does not render the vehicles noncompliant with any applicable FMVSS and further investigation at this time is not likely to result in identification of a defect trend.

Current VOQ Status. The petitioner states that at the time the petition was sent there were "at least 45 VOQs on record with respect to vehicle speed control involving unwanted acceleration in MY 2007 Lexus ES350." Table 2 provides a breakdown of complaints to ODI relating to unintended acceleration in MY 2007 Lexus ES350 vehicles by category and date of receipt relative to completion of the prior investigation.

Analysis of the VOQs cited by the petitioner do not indicate a defect trend other than that involving the accelerator pedal as held down by a floor mat. The complaints ODI deemed related to floor mat interference outnumbered all other reports of alleged sudden and uncontrollable surge in acceleration reported during and subsequent to the ODI investigation. As previously noted, Toyota has initiated a safety recall to address the potential for unwanted acceleration due to accelerator pedal entrapment by floor mats in approximately 3.8 million vehicles, including the subject vehicles.

Unintended acceleration category	Prior to EA07-010 closing	Since EA07-010 closing	Total
Floor mat interference:			
- Recalled accessory all-weather mats	22	11	33
- Other floor mats	3	9	12
- Consistent with mat interference	1	4	5
(mat unknown)			
Subtotal, floor mat interference	26	24	50
Other:			
- Transmission shift quality	-	3	3
- Parking lot type maneuvers	2	6	8
- Throttle response	-	1	1
- Cruise control sensitivity	1	-	1
- Other	-	1	1
Subtotal, other	3	11	14
Total	29	35	64

Table 2. Vehicle Owner Questionnaires to ODI Related to Unintended Acceleration Incidents in MY 2007 Lexus ES350 Vehicles.

IV. ODI ANALYSIS OF THE PETITION REQUEST FOR AN INVESTIGATION OF

MY 2002 THROUGH 2003 LEXUS ES300 VEHICLES

Petitioner requests that ODI investigate MY 2002 through 2003 Lexus ES300 vehicles for complaints related to the petition for MY 2007 Lexus ES350 vehicles. Petitioner cites an earlier ODI investigation, PE04-021, during which 26 complaints initially considered by the Agency as part of that investigation later were determined to be outside the scope of that investigation. Petitioner states, "Reviewing all pertinent data across model years will better indicate the existence of any pattern."

On March 3, 2004, ODI opened Preliminary Evaluation PE04-021 to investigate allegations of vehicle surge during low speed driving maneuvers (such as parking) in MY 2002 through 2003 Toyota Camry, Camry Solara, and Lexus ES300 vehicles (approximately 980,000

vehicles). ODI opened PE04-021 based on owner reports alleging either an engine speed increase occurring without pressing on the accelerator pedal or the engine speed failing to decrease when the accelerator pedal was released. When PE04-021 was opened, ODI counted 37 complaints, including 30 reported crashes and 5 alleged injuries, potentially related to the alleged defect.

Upon further investigation, ODI determined that 26 of the 37 complaints fell outside the scope of PE04-021. ODI determined that these complaints related to longer duration incidents involving uncontrollable acceleration where brake pedal application allegedly had no effect and thus were not within the scope of the investigation. The investigation focused on incidents where the subject vehicle throttle control system opened the throttle valve without driver intent. ODI believed that the resultant vehicle surge could result in a momentary loss of vehicle control, often resulting in crashes of varying severity as the drivers were unable to react in time to apply the brakes effectively.

None of the complaints identified by the petitioner and received by ODI would fall within the scope of the investigation requested by the petitioner, nor do they indicate a defect trend unrelated to the accelerator pedal. In consideration of Mr. **Mathematical Scope** of PE04-021 as well as any other MY 2002-2003 Lexus ES300 VOQ received by ODI from the time of the opening of PE04-021 to the receipt of Mr. **Mathematical Scope** of PE04-021, only 2 involved MY 2002-2003 ES300 vehicles (VOQ 10032815 and 8017143).¹³ Neither of these VOQs involved longer duration incidents of unintended acceleration where brake pedal

¹³ VOQ 10032815 states that a MY 2002 ES300 was pulling into a parking space at less than 10 miles per hour when the car suddenly accelerated. VOQ 8017143 states that a MY 2002 ES300 was pulling into a parking space with the driver's foot on the brake when it suddenly accelerated and hit a tree. It also noted that while driving with the cruise control on the driver tapped the brakes to disengage the cruise control and the vehicle suddenly accelerated.

application allegedly was ineffective in MY 2002 and 2003 Lexus ES300 vehicles. Likewise, none of the remaining VOQs reviewed by ODI in response to Mr.

V. CONCLUSION

Toyota has initiated a safety recall (Recall 09V-388) to address concerns with potential accelerator pedal entrapment by floor mats in approximately 3.8 million vehicles, including the subject vehicles. Except insofar as the petitioner's contentions relate to that recall, the factual bases of the petitioner's contentions that any further investigation is necessary are unsupported. In our view, additional investigation is unlikely to result in a finding that a defect related to motor vehicle safety exists or a NHTSA order for the notification and remedy of a safety-related defect as alleged by the petitioner at the conclusion of the requested investigation. Therefore, in view of the need to allocate and prioritize NHTSA's limited resources to best accomplish the agency's safety mission, the petition is denied. This action does not constitute a finding by NHTSA that a safety-related defect does not exist. The agency will take further action if warranted by future circumstances.

Authority: 49 U.S.C. 30162(d); delegations of authority at CFR 1.50 and 501.8.

Issued on:

Kathleen C. DeMeter Director Office of Defects Investigation

Billing Code 4910-59-P



1200 New Jersey Avenue SE. Washington, DC 20590



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DEPARTMENT OF TRANSPORTATION

National Highway Traffic Safety Administration Denial of Motor Vehicle Defect Petition

AGENCY: National Highway Traffic Safety Administration, (NHTSA), Department of Transportation

ACTION: Denial of a petition for a defect investigation.

SUMMARY: This notice sets forth the reasons for the denial of a petition (Defect Petition DP09-001) submitted by Mr. (petitioner) to the Administrator of NHTSA by a letter dated March 13, 2009, under 49 CFR part 552. The petitioner requests additional investigations of: (1) the unwanted and unintended acceleration of model year 2007 Lexus ES350 vehicles and (2) model years 2002-2003 Lexus ES300 for long duration incidents involving uncontrolled acceleration where brake pedal application had no effect.

After conducting a technical review of the material cited and provided by the petitioner, material contained within investigations cited by petitioner, information relevant to material cited by petitioner, and conducting interviews with complainants and manufacturer representatives, and taking into account several considerations, including, among others, a recent safety recall by Toyota (NHTSA Recall 09V-388), allocation of agency resources, agency priorities, and the likelihood that additional investigations would result in a finding that a defect related to motor vehicle safety exists, NHTSA has concluded that further investigation of the issues raised by the petition is not warranted. The agency accordingly has denied the petition.

FOR FURTHER INFORMATION CONTACT: Mr. Stephen McHenry, Vehicle Control Division, Office of Defects Investigation, NHTSA, 1200 New Jersey Avenue, SE, Washington, DC 20590. Telephone 202-366-0139. E-mail <u>stephen.mchenry@dot.gov</u>.

SUPPLEMENTARY INFORMATION:

I. INTRODUCTION

Interested persons may petition NHTSA requesting that the agency initiate an investigation to determine whether a motor vehicle or item of replacement equipment does not comply with an applicable motor vehicle safety standard or contains a defect that relates to motor vehicle safety. 49 CFR § 552.1. Upon receipt of a properly filed petition the agency conducts a technical review of the petition, material submitted with the petition, and any additional information. § 552.6. After considering the technical review and taking into account appropriate factors, which may include, among others, allocation of agency resources, agency priorities, and the likelihood of success in litigation that might arise from a determination of a noncompliance or a defect related to motor vehicle safety, the agency will grant or deny the petition. § 552.8.

II. DEFECT PETITION BACKGROUND INFORMATION

The petitioner, Mr. Jeffrey Pepski of Plymouth, Minnesota, owns a model year (MY) 2007 Lexus ES350 (VIN JTHBJ46G072

Driving home from work, I experienced a sudden uncontrollable surge in acceleration causing my speed to increase from about 60 mph to 80+ mph. Immediately I began to brake hard as I was rapidly approaching traffic just ahead of me. Fortunately the inside left lane was unoccupied and I was able to make an immediate lane change. Initially I depressed the brake pedal as hard as I could using both feet but only managed to slow the vehicle to 40-45 mph. With my speed reduced, I alternated between pumping the accelerator pedal and pulling up on it from the underside with my right foot as it became clear that the throttle was stuck in an open position. The vehicle continued to speed back up to over 65 mph with less pressure on the brake pedal.

With traffic just ahead of me, I moved over to the left shoulder next to the center barrier and continued to try to release the open throttle. There were clouds of smoke around the vehicle and the smell of burning materials from the overheating brakes. After finally getting the vehicle slowed down to about 25-30 mph, I shifted into "Neutral" and depressed the start/stop push button a number of times hoping to stop the engine but nothing happened. Instead the RPMs moved up into the redline range on the tachometer. I quickly shifted back into "Drive"; the vehicle jolted and rapidly accelerated to 60+ mph.

As the brakes were fading quickly, I was certain that I would need to shift back into "Neutral" and let the engine blow up to stop the vehicle. Suddenly the acceleration surge stopped and I was able to bring the vehicle to a stop about 1 ¹/₂ to 2 miles from where it had started. I quickly shifted into "Park" and depressed the start/stop push button to turn off the engine. The vehicle seemed to shutter as I did so. Upon restarting the car, I drove cautiously to Lexus of Wayzata a short distance away fully prepared to shift into "Neutral" if the acceleration repeated. The car remains there over 5 weeks later.

Following the incident, Mr. Submitted a complaint to Toyota and a claim to the Lexus Customer Satisfaction Department, requesting that Lexus repurchase his vehicle. According to Toyota, the Lexus dealer service technician who inspected Mr. Submitted vehicle after the incident observed that the driver's side floor mat retaining clips were not properly secured and "the floor mat was in a position where it could interfere with the operation and travel
of the accelerator pedal."¹ Toyota denied Mr. claim on March 10, 2009, concluding that the event was caused by an out-of-position floor mat:^{2,3}

The inspection of your vehicle revealed no evidence of any vehicle defects or malfunction. The throttle assembly and accelerator pedal were operating as designed, with no binding or sticking of any of the components. The brakes showed signs of excessive wear which is consistent with what you described happened to you.

The inspection also revealed that the floor mat was in a position where it could interfere with the operation and travel of the accelerator pedal. When the vehicle was taken in to the dealership, the floor mat retaining clips were not properly secured which allowed the floor mat to move out of position. While we understand that you feel the floor mat was not the problem, the evidence revealed during our inspection showed otherwise.

On March 12, 2009, Mr. reported his initial complaint to NHTSA and on March 13, 2009, he sent a defect petition to NHTSA that was received by the Office of Defects Investigation (ODI) on March 19, 2009 (ODI No. 10263408). On May 1, 2009, ODI investigator Stephen McHenry and Vehicle Research Test Center engineer Mr. William Collins met with the petitioner at Lexus of Wayzata in Wayzata, Minnesota. Also in attendance was Mr. Mike Zarnecki, Field Technical Specialist from the Lexus Central Area Office in Naperville, Illinois.

¹ Chris Tinto, Toyota Motor North America, Inc., letter to Kathleen DeMeter, ODI, May 14, 2009, <u>Response to the</u> <u>Petition for a Defect Investigation Submitted by</u> (see public file for DP09-001).

² Troy Higa, Toyota Motor Sales, U.S.A., Inc., letter to Jeff Pepski, March 10, 2009 (see public file for DP09-001).

³ The issue of accelerator pedal entrapment by an unsecured floor mat in the subject vehicles is addressed by Recall 09V-388.

The petitioner was interviewed and the petitioner's vehicle was test driven. No functional abnormalities were noted during the test drive. According to Mr. Zarnecki and notes from the dealership's work order, no fault codes were found in the vehicle's powertrain computer system. Toyota concluded that the incident was caused by an improperly installed floor mat.

The petition requests additional investigations of (1) unwanted and unintended acceleration in MY 2007 Lexus ES350 vehicles, previously investigated by ODI in PE07-016 and EA07-010; and (2) longer duration incidents of unintended acceleration where brake pedal application allegedly was ineffective in MY 2002 and 2003 Lexus ES300 vehicles, previously investigated by ODI in PE04-021.

The petitioner cites seven issues in support of the petition to investigate the MY 2007 Lexus ES350:

Issue #1.	Proper Party to Preliminary Evaluation PE07-016;
Issue #2.	Toyota's Response – Causes of Alleged Defect;
Issue #3.	Narrow Scope of Preliminary Evaluation PE07-016;
Issue #4.	Vehicle Certification Label – Compliance with Federal Safety Standard No. 124;
Issue #5.	Adequacy of Service Brakes;
Issue #6.	Ignition/Engine Switch; and
Issue #7.	ECM and ECUs – Lack of Inputs and Receipt of Contradictory Inputs.

The petitioner contends that expanding the investigation to include MY 2002 and 2003 Lexus ES300 vehicles is necessary because "reviewing all pertinent data across model years will better indicate the existence of any pattern."

III. ODI ANALYSIS OF THE PETITION REQUEST FOR ADDITIONAL INVESTIGATION OF MY 2007 LEXUS ES350 VEHICLES.

Background.

On March 29, 2007, ODI opened Preliminary Evaluation PE07-016 to investigate the potential for accessory all-weather floor mats sold by Toyota to interfere with the accelerator pedal in MY 2007 Lexus ES350 vehicles. The investigation was based on a thorough review of complaints involving unintended acceleration that identified five incidents that likely were caused by interference between Toyota's accessory all-weather floor mat and the accelerator pedal. ODI upgraded the investigation to Engineering Analysis EA07-010 on August 8, 2007, and expanded the population to include MY 2007 and 2008 Lexus ES, ES350, and Toyota Camry vehicles. At that time, ODI had identified 17 complaints related to floor mat interference with the accelerator pedal in the subject vehicles.

ODI closed the investigation on October 11, 2007, after Toyota decided to conduct a recall of the accessory all-weather floor mats. Toyota's recall provided for the replacement of the accessory all-weather floor mats with mats that were redesigned to reduce the potential for pedal interference in the event that they were installed incorrectly. When EA07-010 was closed, ODI was aware of 26 Vehicle Owner Questionnaires ("VOQs" or "complaints") concerning incidents of unwanted acceleration involving accessory all-weather floor mat interference in MY 2007 and 2008 Lexus ES, ES350, and Toyota Camry vehicles, including seven crashes. Twenty of the complaints involved MY 2007 Lexus ES350 vehicles.

The following summarizes the issues cited by the petitioner as the bases for opening the requested investigations and ODI's assessment of each issue.

Issue #1: Toyota's response to ODI's April 5, 2007, information request (IR) letter in PE07-016 "may have been limited in some manner" by the definition of "Toyota" used in the IR.

The petitioner contends that since ODI's April 7, 2007, letter to Toyota requesting information in support of PE07-016 defined "Toyota" as "Toyota Motor North America, Inc." rather than "Toyota Motor Corporation," Toyota's responses "may have been limited in some manner by the failure to properly address the appropriate parties to the investigation."

The petitioner's concern is unfounded. In a May 14, 2009, letter responding to Mr. petition, Toyota confirmed that it "construed the request to apply to all Toyota entities, including the entities identified by Mr. **Mathematical Structure**, and that its earlier responses included all nonprivileged responsive information and documents in the possession of all of those Toyota entities."

Issue #2 and Issue #3: The Agency failed to investigate allegations of unwanted acceleration that were not related to improper installation of the accessory all-weather floor mats.

In Issue #2, the petitioner contends that NHTSA should have investigated incidents of unintended acceleration that it determined were unrelated to improper installation of the accessory all-weather floor mat. In Issue #3, the petitioner contends that the scope of PE07-016 should have been "broadened or increased for additional causes beyond the all-weather floor mats" based on (1) information submitted by Toyota in its June 11, 2007, letter responding to ODI's information request, (2) additional complaints received by ODI after PE07-016 was opened; and (3) the results of a survey conducted for ODI by NHTSA's Vehicle Research and Test Center (VRTC) which "identified vehicles without all-weather car mats experiencing

unintended acceleration." ODI interprets these issues as one in the same—an allegation that the Agency failed to investigate complaints by subject vehicle owners that petitioner claims are unrelated to the recalled accessory all-weather floor mats.

ODI reviewed each complaint submitted by Toyota in its response to the PE07-016 IR and identified a safety defect trend related to interference between the accessory all-weather floor mat and the accelerator pedal that could trap the pedal near the floor during certain accelerator pedal applications (e.g., hard pedal applications while passing slower traffic, accelerating into traffic, and/or accelerating up grades). ODI carefully analyzed that data during the prior investigation and again during the review of this petition, including detailed interviews of drivers and, in some cases, field investigations to inspect vehicles and incident scenes. ODI determined that floor mat interference was the condition warranting investigation based on frequency of occurrence and nature of the events.

The petitioner identified ten complaints as evidence that "<u>not</u> all these incidents are related to an accessory all weather floor mat entrapping the throttle pedal." These complaints are presented in Table 1. The petitioner contends that the complaints that have a number marked with an asterisk are "five other VOQs where floor mats were not involved in the unwanted acceleration."

Contrary to the petitioner's contention, six of the VOQs were related to floor mat interference (four of the five that petitioner singled out as unrelated to floor mats were related to floor mats). Three of the remaining four complaints involved incidents occurring during lowspeed close-quarter driving maneuvers—circumstances that are not similar to those complained of by petitioner; the other complaint does not indicate an unintended acceleration event.

Evidence of		
Floor Mat	ODI File	
Interference	Number	Description
Yes	10199857*	Unsecured floor mat discovered and corrected during dealer
		inspection.
	10203221*	All-weather accessory floor mat improperly "stacked" on top of
		carpet mat.
	10218118	Unsecured floor mat slid forward and interfered with accelerator
		pedal return.
	10223792	Passenger side floor mats improperly placed on driver side,
		resulting in accelerator pedal interference.
	10230560*	Floor mats were not returned to proper position after oil change,
		resulting in accelerator pedal interference.
	10230929*	All-weather accessory floor mat improperly "stacked" on top of
		carpet mat.
No	10192384	Single incident of alleged engine surge while parking in garage.
		No trouble found by dealer.
	10218961	Driver concerned that vehicle accelerated more quickly than
		expected when the accelerator pedal was depressed.
	10219328	Single incident of alleged engine surge while parking vehicle. No
		trouble found by dealer.
	10226564*	Alleged idle flare when idling. Dealer reprogrammed transmission
		control unit.

Table 1. Ten VOQs Identified in the Petition as Evidence of Unintended Acceleration Experience <u>Not</u> Related to Floor Mats.

In addition to the analyses of the complaint and survey data, ODI and VRTC also

conducted design reviews and testing to evaluate the possibility of other potential causes of

unintended acceleration in the subject vehicles. Some of this work is summarized in the

following excerpt from the VRTC test report:⁴

The Vehicle Research and Test Center obtained a Lexus ES350 for testing. The vehicle was fully instrumented to monitor and acquire data relating to yaw rate, speed, acceleration, deceleration, brake pedal effort, brake line hydraulic pressure, brake pad temperature, engine vacuum, brake booster vacuum, throttle plate position, and accelerator pedal position. Multiple electrical signals were introduced into the electrical system to test the robustness of the electronics against single point failures due to electrical interference. The system proved to have multiple redundancies and showed no vulnerabilities to electrical signal activities. Magnetic fields were introduced in proximity to the throttle body and

⁴ VRTC Memorandum Report EA07-010, VRTC-DCD-7113, <u>2007 Lexus ES-350 Unintended Acceleration</u>, Section 3.1 Dynamic Vehicle Testing, April 30, 2008.

accelerator pedal potentiometers and did result in an increase in engine revolutions per minute (RPM) of up to approximately 1,000 RPM, similar to a cold-idle engine RPM level. Mechanical interferences at the throttle body caused the engine to shut down.

Petitioner's assertion that the Agency failed to investigate other causes of unintended acceleration and, as a result, may have failed to identify other causes of unintended acceleration is unsupported. Several complaints identified by the petitioner as unrelated to interference between the floor mat and accelerator pedal, in fact, involved this problem. We note that Toyota has initiated a safety recall program to address the potential for unwanted acceleration due to accelerator pedal entrapment by floor mats in approximately 3.8 million vehicles, including the subject vehicles. Analysis of the remaining complaints identified by the petitioner failed to identify a defect trend unrelated to this issue.

Issue #4: The subject vehicles do not comply with FMVSS No. 124.

The petitioner contends that the subject vehicles do not satisfy requirements of Federal Motor Vehicle Safety Standard (FMVSS) 124, Accelerator control systems. Specifically, the petitioner contends that the subject vehicles do not comply with paragraph S5.3, which requires the throttle to return to the idle position within one second, and paragraph S5.1, which requires at least two independent sources of energy capable of returning the throttle to the idle position within the time requirements of paragraph S5.3. The petitioner's concerns with the subject vehicles' compliance with FMVSS 124 are apparently based upon his belief that the rule requires a vehicle equipped with a throttle position or accelerator pedal position sensor that measures "any force/pressure to the driver-operated control or any release of the actuating force to the driver-operated control (i.e., accelerator pedal)."

As an initial matter, FMVSS 124 does not require a particular design to meet its requirements; it is a performance standard. It is the responsibility of a manufacturer of vehicles

and/or items of motor vehicle equipment to manufacture and sell vehicles that comply with applicable motor vehicle safety standards and to certify that each motor vehicle and/or equipment item is in complies with applicable FMVSSs. This is a self-certification process. This usually means testing by the manufacturer in accordance with the FMVSS to ensure that its vehicles and equipment comply with the FMVSS.

Petitioner's basis for this issue is unsupported as there is no indication that the subject vehicles are not fully compliant with FMVSS 124.⁵ Paragraph S5.3 does not mandate compliance with any specific design feature, including a throttle position or accelerator pedal position sensor. In its May 14, 2009, letter responding to Mr. **The subject of the subject vehicles fully complies with the requirements of FMVSS** No. 124, as demonstrated by tests conducted in the manner specified in the laboratory test procedure issued by NHTSA's Office of Vehicle Safety Compliance, TP-124-06 (April 20, 2000)." Regarding paragraph S5.1, the pedal assembly on the subject vehicles is biased to the "up," or idle, position by two independent springs.⁶ .

⁵ The petitioner maintains that, because of the alleged non-compliance with FMVSS 124 and Toyota's knowledge thereof, the Vehicle Certification label on all MY 2007 Lexus ES350 vehicles does not comply with §§ 30112(a)(1) and 30115(a) of Title 49 of the U.S. Code. As Toyota states in its May 14, 2009, letter, "[b]ecause the vehicles fully comply with the standard, …there is no merit to Mr. Pepski's allegations that Toyota violated 49 U.S.C. § 30112(a) when it sold those vehicles, or that it violated 49 U.S.C. § 30115(a) when it certified them as complying with all applicable FMVSSs."

⁶ ODI notes that the petitioner's description of his attempts to "dislodge the throttle by alternatively pumping the accelerator pedal and pulling up on it from the underside" strongly suggest an accelerator pedal that is being physically "trapped" by some foreign object, such as the floor mat (in his case the original equipment carpet).

When ODI and VRTC investigators met with the petitioner and inspected his vehicle the accelerator pedal assembly was functioning properly and there were no anomalies noted in the return springs. Wear marks were noted at the leading edge of the front right edge of the carpet mat, which may have been an indication of contact between the mat and the bottom edge of the accelerator pedal. ODI confirmed that the pedal is such that it can be held down by the mat. Once trapped, the pedal can remain trapped after repeated efforts to "pump" the pedal.

Issue #5: The subject vehicles do not comply with FMVSS No. 135.

The petitioner questions whether the service brakes of the subject vehicles are capable of meeting the performance requirements of FMVSS 135, Light-vehicle brake systems, with a throttle that has been stuck in an open position. The petitioner interprets complaints received by ODI of instances where a subject vehicle operator was unable to prevent a vehicle with a stuck accelerator pedal from traveling a "significant distance" as a functional failure as defined in paragraph S4 of FMVSS 135. Petitioner contends that, due to the significant distances travelled by subject vehicles with stuck accelerator pedals, compliance with the stopping distance requirement under paragraph S7.11.4 of FMVSS 135 is "unlikely".

Petitioner's contentions regarding compliance with FMVSS 135 are without merit and there is no indication that the subject vehicles are not fully compliant with FMVSS 135. The stopping distance of a subject vehicle with a throttle stuck in an open position is irrelevant with respect to whether the vehicle is compliant with paragraph S7.11.4 of FMVSS 135. Pursuant to paragraph S7.11.2(b), the stopping distances required under paragraph S7.11.4 must be met by a vehicle with its transmission position in Neutral. The complaints referenced by the petitioner stem from incidences occurring on subject vehicles with a transmission position in drive.

Testing conducted by VRTC determined that the brake pedal force required to stop a subject vehicle with a wide open throttle was significantly greater than when the vehicle is operating with a closed throttle.

Significant brake pedal force in excess of 150 pounds was required to stop the vehicle, compared to 30 pounds required when the vehicle is operating normally. Stopping distances increased from less than 200 feet to more than 1,000 feet.⁷

⁷ VRTC Memorandum Report EA07-010, VRTC-DCD-7113, <u>2007 Lexus ES-350 Unintended Acceleration</u>, Section 3.3.1 Application of the brake, April 30, 2008.

Many of the incident drivers interviewed by ODI have stated that application of the brakes reduced acceleration but did not stop the vehicle. In assessing these complaints ODI notes that brake effectiveness in controlling a stuck open throttle event is significantly reduced once the vacuum reserve of the vacuum boosted power assist system is depleted. ⁸ The friction generated from brake application with the wheels driven by full engine power results in significant heating of the brake components. Continued operation in this mode causes degradation of the brake friction materials, further reducing brake effectiveness and the ability of the driver to control vehicle speed.

ODI notes that the petitioner confuses the Brake Assist system referenced in the Owner's Manual with the brake power assist system. Brake Assist is a computer controlled automobile braking technology that increases braking pressure in an emergency situation (e.g., crash avoidance braking). The Brake Assist technology used by Toyota in the subject vehicles detects an emergency situation by monitoring the rate of change of brake hydraulic pressure from the master cylinder. Based on the information gathered by ODI in interviews of incident drivers, there is no reason to believe that Brake Assist was activated during the unwanted acceleration events.⁹ While virtually all of the drivers indicated that they applied a great deal of force to the brake pedal in an effort to slow and stop the vehicle, it is possible that the manner (i.e., rate) in which the force was applied, or the absence of the amplifying vacuum boost, did not produce a brake system pressure pulse that is necessary to activate the Brake Assist system.

⁸ The petitioner also incorrectly interprets the loss of vacuum during operation at wide-open throttle as a "Functional Failure" of the brake power assist unit as defined in S4 of FMVSS 135. VRTC's testing demonstrates that the braking performance described by drivers of incident vehicles is consistent with open throttle braking with depleted vacuum in the vacuum boosted power assist system. Consequently, the petitioner's concerns with the adequacy of the service braking in the subject vehicles do not provide any basis for further investigation.

⁹ It is not possible to determine whether Brake Assist was activated for any length of time during any of the unwanted acceleration incidents ODI investigated in the subject vehicle population.

Issue #6: Operation of the subject vehicles' Ignition/Engine Switch poses a safety issue.

Petitioner contends that, according to the description of operation in the subject vehicle Owner's Manual, the engine cannot be switched off during an unintended acceleration event as the vehicle is not in Park.¹⁰ Petitioner contends further that if the engine *can* be switched off during an unintended acceleration event, doing so would lock the steering wheel and move it up and away from the driver.¹¹ The petitioner concludes that "the inability to turn off the engine in a safe manner is a significant safety issue with this 'push button' ignition issue."

The petitioner is incorrect in his description of the function of the ignition switch and steering column safety features. The engine can be turned off while in motion by pressing and holding the ignition push-button start/stop switch for at least three seconds. The press and hold function is meant to avoid inadvertent engine shut-off while in motion. Turning of the engine in this manner puts the vehicle electrical system in Accessory ("ACC") mode, in which the steering wheel does not lock or retract (as opposed to putting the vehicle in "OFF" mode, which can only occur when the vehicle is in Park).¹²

Issue #7: Contradictory sensor data logic should resolve on the side of safety.

The petitioner posits that "contradictory sensor data (e.g., open throttle and sustained extreme brake pressure) should error on the side of caution and safety." The petitioner correctly

¹⁰ Petitioner cites the following language to support this claim: "The engine cannot be switched to OFF unless the shift lever is in P." Toyota has indicated that this should be changed to the <u>vehicle</u> cannot be switched OFF until the shift lever is in Park."

¹¹ Petitioner references the following language: "When the engine switch is turned OFF, the steering wheel returns to its stowed position by moving up and away to enable easier driver entry and exit. Switching to ACC or IG-ON mode will return the steering wheel to the original position."

¹² It its May 14, 2009, letter, Toyota admits that in its description of the function of these features, even though "technically correct," is confusing. Toyota states that it plans to revise this portion of the manual to address any confusion.

notes that the subject vehicles throttle control logic does not change with brake application. However, while in certain circumstances it may be desirable for the vehicle throttle control system to respond to simultaneous applications of brake and accelerator pedals by prioritizing the braking command and limiting throttle opening, the absence of this function in the Toyota designs does not render the vehicles noncompliant with any applicable FMVSS and further investigation at this time is not likely to result in identification of a defect trend.

Current VOQ Status. The petitioner states that at the time the petition was sent there were "at least 45 VOQs on record with respect to vehicle speed control involving unwanted acceleration in MY 2007 Lexus ES350." Table 2 provides a breakdown of complaints to ODI relating to unintended acceleration in MY 2007 Lexus ES350 vehicles by category and date of receipt relative to completion of the prior investigation.

Analysis of the VOQs cited by the petitioner do not indicate a defect trend other than that involving the accelerator pedal as held down by a floor mat. The complaints ODI deemed related to floor mat interference outnumbered all other reports of alleged sudden and uncontrollable surge in acceleration reported during and subsequent to the ODI investigation. As previously noted, Toyota has initiated a safety recall to address the potential for unwanted acceleration due to accelerator pedal entrapment by floor mats in approximately 3.8 million vehicles, including the subject vehicles.

	Prior to EA07-010	Since EA07-010	
Unintended acceleration category	closing	closing	Total
Floor mat interference:			
- Recalled accessory all-weather mats	22	11	33
- Other floor mats	3	9	12
- Consistent with mat interference	1	4	5
(mat unknown)			
Subtotal, floor mat interference	26	24	50
Other:			
- Transmission shift quality	-	3	3
- Parking lot type maneuvers	2	6	8
- Throttle response	-	1	1
- Cruise control sensitivity	1	-	1
- Other	-	1	1
Subtotal, other	3	11	14
Total	29	35	64

Table 2. Vehicle Owner Questionnaires to ODI Related to Unintended Acceleration Incidents in MY 2007 Lexus ES350 Vehicles.

IV. ODI ANALYSIS OF THE PETITION REQUEST FOR AN INVESTIGATION OF

MY 2002 THROUGH 2003 LEXUS ES300 VEHICLES

Petitioner requests that ODI investigate MY 2002 through 2003 Lexus ES300 vehicles for complaints related to the petition for MY 2007 Lexus ES350 vehicles. Petitioner cites an earlier ODI investigation, PE04-021, during which 26 complaints initially considered by the Agency as part of that investigation later were determined to be outside the scope of that investigation. Petitioner states, "Reviewing all pertinent data across model years will better indicate the existence of any pattern."

On March 3, 2004, ODI opened Preliminary Evaluation PE04-021 to investigate allegations of vehicle surge during low speed driving maneuvers (such as parking) in MY 2002 through 2003 Toyota Camry, Camry Solara, and Lexus ES300 vehicles (approximately 980,000 vehicles). ODI opened PE04-021 based on owner reports alleging either an engine speed increase occurring without pressing on the accelerator pedal or the engine speed failing to decrease when the accelerator pedal was released. When PE04-021 was opened, ODI counted 37 complaints, including 30 reported crashes and 5 alleged injuries, potentially related to the alleged defect.

Upon further investigation, ODI determined that 26 of the 37 complaints fell outside the scope of PE04-021. ODI determined that these complaints related to longer duration incidents involving uncontrollable acceleration where brake pedal application allegedly had no effect and thus were not within the scope of the investigation. The investigation focused on incidents where the subject vehicle throttle control system opened the throttle valve without driver intent. ODI believed that the resultant vehicle surge could result in a momentary loss of vehicle control, often resulting in crashes of varying severity as the drivers were unable to react in time to apply the brakes effectively.

None of the complaints identified by the petitioner and received by ODI would fall within the scope of the investigation requested by the petitioner, nor do they indicate a defect trend unrelated to the accelerator pedal. In consideration of Mr. petition, ODI conducted a review of the 26 VOQs it determined outside the scope of PE04-021 as well as any other MY 2002-2003 Lexus ES300 VOQ received by ODI from the time of the opening of PE04-021 to the receipt of Mr. petition. Of the 26 VOQs outside the scope of PE04-021, only 2 involved MY 2002-2003 ES300 vehicles (VOQ 10032815 and 8017143).¹³ Neither of these VOQs involved longer duration incidents of unintended acceleration where brake pedal

¹³ VOQ 10032815 states that a MY 2002 ES300 was pulling into a parking space at less than 10 miles per hour when the car suddenly accelerated. VOQ 8017143 states that a MY 2002 ES300 was pulling into a parking space with the driver's foot on the brake when it suddenly accelerated and hit a tree. It also noted that while driving with the cruise control on the driver tapped the brakes to disengage the cruise control and the vehicle suddenly accelerated.

application allegedly was ineffective in MY 2002 and 2003 Lexus ES300 vehicles. Likewise, none of the remaining VOQs reviewed by ODI in response to Mr.

V. CONCLUSION

Toyota has initiated a safety recall (Recall 09V-388) to address concerns with potential accelerator pedal entrapment by floor mats in approximately 3.8 million vehicles, including the subject vehicles. Except insofar as the petitioner's contentions relate to that recall, the factual bases of the petitioner's contentions that any further investigation is necessary are unsupported. In our view, additional investigation is unlikely to result in a finding that a defect related to motor vehicle safety exists or a NHTSA order for the notification and remedy of a safety-related defect as alleged by the petitioner at the conclusion of the requested investigation. Therefore, in view of the need to allocate and prioritize NHTSA's limited resources to best accomplish the agency's safety mission, the petition is denied. This action does not constitute a finding by NHTSA that a safety-related defect does not exist. The agency will take further action if warranted by future circumstances.

Authority: 49 U.S.C. 30162(d); delegations of authority at CFR 1.50 and 501.8.

Issued on:

Kathleen C. DeMeter Director Office of Defects Investigation

Billing Code 4910-59-P



U.S. Department of Transportation

National Highway Traffic Safety Administration 1200 New Jersey Avenue SE. Washington, DC 20590

Plymouth, MN

NVS-213 DP09-001

Dear Mr.

This letter is in response to your petition requesting that the National Highway Traffic Safety Administration (NHTSA) conduct a defect investigation into (1) unwanted and unintended acceleration in model year (MY) 2007 Lexus ES350 vehicles, and (2) longer duration incidents of unintended acceleration where brake pedal application allegedly was ineffective in MY 2002 and 2003 Lexus ES300 vehicles.

We have evaluated your petition, and a summary of the evaluation is presented in the enclosed notice, which will be published in the <u>Federal Register</u>.

Based on our evaluation, it is unlikely that NHTSA would issue an order requiring the notification and remedy for either of the two aforementioned conditions in the vehicles you indicated. Toyota has recently issued a recall, 09V-388, for 3.8 million vehicles, including the MY 2007 Lexus ES350, to correct a condition wherein the accelerator pedals are trapped by floor mats.

Thank you for bringing this matter to our attention.

Sincerely,

Kathleen C. DeMeter Director Office of Defects Investigation

Enclosure: Federal Register Notice



DEPARTMENT OF TRANSPORTATION

National Highway Traffic Safety Administration Denial of Motor Vehicle Defect Petition

AGENCY: National Highway Traffic Safety Administration, (NHTSA), Department of Transportation

ACTION: Denial of a petition for a defect investigation.

SUMMARY: This notice sets forth the reasons for the denial of a petition (Defect Petition DP09-001) submitted by Mr. (petitioner) to the Administrator of NHTSA by a letter dated March 13, 2009, under 49 CFR part 552. The petitioner requests additional investigations of: (1) the unwanted and unintended acceleration of model year 2007 Lexus ES350 vehicles and (2) model years 2002-2003 Lexus ES300 for long duration incidents involving uncontrolled acceleration where brake pedal application had no effect.

After conducting a technical review of the material cited and provided by the petitioner, material contained within investigations cited by petitioner, information relevant to material cited by petitioner, and conducting interviews with complainants and manufacturer representatives, and taking into account several considerations, including, among others, a recent safety recall by Toyota (NHTSA Recall 09V-388), allocation of agency resources, agency priorities, and the likelihood that additional investigations would result in a finding that a defect related to motor vehicle safety exists, NHTSA has concluded that further investigation of the issues raised by the petition is not warranted. The agency accordingly has denied the petition. **FOR FURTHER INFORMATION CONTACT:** Mr. Stephen McHenry, Vehicle Control Division, Office of Defects Investigation, NHTSA, 1200 New Jersey Avenue, SE, Washington, DC 20590. Telephone 202-366-0139. E-mail <u>stephen.mchenry@dot.gov</u>.

SUPPLEMENTARY INFORMATION:

I. INTRODUCTION

Interested persons may petition NHTSA requesting that the agency initiate an investigation to determine whether a motor vehicle or item of replacement equipment does not comply with an applicable motor vehicle safety standard or contains a defect that relates to motor vehicle safety. 49 CFR § 552.1. Upon receipt of a properly filed petition the agency conducts a technical review of the petition, material submitted with the petition, and any additional information. § 552.6. After considering the technical review and taking into account appropriate factors, which may include, among others, allocation of agency resources, agency priorities, and the likelihood of success in litigation that might arise from a determination of a noncompliance or a defect related to motor vehicle safety, the agency will grant or deny the petition. § 552.8.

II. DEFECT PETITION BACKGROUND INFORMATION

The petitioner, Mr. **1** of Plymouth, Minnesota, owns a model year (MY) 2007 Lexus ES350 (VIN JTHBJ46G072). On March 12, 2009, Mr. **1** filed a complaint with NHTSA (ODI No. 10261660) alleging a "sudden and uncontrollable surge in acceleration" while driving home from work on February 3, 2009:

Driving home from work, I experienced a sudden uncontrollable surge in acceleration causing my speed to increase from about 60 mph to 80+ mph. Immediately I began to brake hard as I was rapidly approaching traffic just ahead of me. Fortunately the inside left lane was unoccupied and I was able to make an immediate lane change. Initially I depressed the brake pedal as hard as I could using both feet but only managed to slow the vehicle to 40-45 mph. With my speed reduced, I alternated between pumping the accelerator pedal and pulling up on it from the underside with my right foot as it became clear that the throttle was stuck in an open position. The vehicle continued to speed back up to over 65 mph with less pressure on the brake pedal.

With traffic just ahead of me, I moved over to the left shoulder next to the center barrier and continued to try to release the open throttle. There were clouds of smoke around the vehicle and the smell of burning materials from the overheating brakes. After finally getting the vehicle slowed down to about 25-30 mph, I shifted into "Neutral" and depressed the start/stop push button a number of times hoping to stop the engine but nothing happened. Instead the RPMs moved up into the redline range on the tachometer. I quickly shifted back into "Drive"; the vehicle jolted and rapidly accelerated to 60+ mph.

As the brakes were fading quickly, I was certain that I would need to shift back into "Neutral" and let the engine blow up to stop the vehicle. Suddenly the acceleration surge stopped and I was able to bring the vehicle to a stop about 1 ½ to 2 miles from where it had started. I quickly shifted into "Park" and depressed the start/stop push button to turn off the engine. The vehicle seemed to shutter as I did so. Upon restarting the car, I drove cautiously to Lexus of Wayzata a short distance away fully prepared to shift into "Neutral" if the acceleration repeated. The car remains there over 5 weeks later.

Following the incident, Mr. Submitted a complaint to Toyota and a claim to the Lexus Customer Satisfaction Department, requesting that Lexus repurchase his vehicle. According to Toyota, the Lexus dealer service technician who inspected Mr. Service vehicle after the incident observed that the driver's side floor mat retaining clips were not properly secured and "the floor mat was in a position where it could interfere with the operation and travel of the accelerator pedal."¹ Toyota denied Mr. Claim on March 10, 2009, concluding that the event was caused by an out-of-position floor mat:^{2,3}

The inspection of your vehicle revealed no evidence of any vehicle defects or malfunction. The throttle assembly and accelerator pedal were operating as designed, with no binding or sticking of any of the components. The brakes showed signs of excessive wear which is consistent with what you described happened to you.

The inspection also revealed that the floor mat was in a position where it could interfere with the operation and travel of the accelerator pedal. When the vehicle was taken in to the dealership, the floor mat retaining clips were not properly secured which allowed the floor mat to move out of position. While we understand that you feel the floor mat was not the problem, the evidence revealed during our inspection showed otherwise.

On March 12, 2009, Mr. reported his initial complaint to NHTSA and on March 13, 2009, he sent a defect petition to NHTSA that was received by the Office of Defects Investigation (ODI) on March 19, 2009 (ODI No. 10263408). On May 1, 2009, ODI investigator Stephen McHenry and Vehicle Research Test Center engineer Mr. William Collins met with the petitioner at Lexus of Wayzata in Wayzata, Minnesota. Also in attendance was Mr. Mike Zarnecki, Field Technical Specialist from the Lexus Central Area Office in Naperville, Illinois.

¹ Chris Tinto, Toyota Motor North America, Inc., letter to Kathleen DeMeter, ODI, May 14, 2009, <u>Response to the</u> <u>Petition for a Defect Investigation Submitted by</u> (see public file for DP09-001).

² Troy Higa, Toyota Motor Sales, U.S.A., Inc., letter to March 10, 2009 (see public file for DP09-001).

³ The issue of accelerator pedal entrapment by an unsecured floor mat in the subject vehicles is addressed by Recall 09V-388.

The petitioner was interviewed and the petitioner's vehicle was test driven. No functional abnormalities were noted during the test drive. According to Mr. Zarnecki and notes from the dealership's work order, no fault codes were found in the vehicle's powertrain computer system. Toyota concluded that the incident was caused by an improperly installed floor mat.

The petition requests additional investigations of (1) unwanted and unintended acceleration in MY 2007 Lexus ES350 vehicles, previously investigated by ODI in PE07-016 and EA07-010; and (2) longer duration incidents of unintended acceleration where brake pedal application allegedly was ineffective in MY 2002 and 2003 Lexus ES300 vehicles, previously investigated by ODI in PE04-021.

The petitioner cites seven issues in support of the petition to investigate the MY 2007 Lexus ES350:

Issue #1.	Proper Party to Preliminary Evaluation PE07-016;
Issue #2.	Toyota's Response – Causes of Alleged Defect;
Issue #3.	Narrow Scope of Preliminary Evaluation PE07-016;
Issue #4.	Vehicle Certification Label – Compliance with Federal Safety Standard No. 124;
Issue #5.	Adequacy of Service Brakes;
Issue #6.	Ignition/Engine Switch; and
Issue #7.	ECM and ECUs – Lack of Inputs and Receipt of Contradictory Inputs.

The petitioner contends that expanding the investigation to include MY 2002 and 2003 Lexus ES300 vehicles is necessary because "reviewing all pertinent data across model years will better indicate the existence of any pattern."

III. ODI ANALYSIS OF THE PETITION REQUEST FOR ADDITIONAL INVESTIGATION OF MY 2007 LEXUS ES350 VEHICLES.

Background.

On March 29, 2007, ODI opened Preliminary Evaluation PE07-016 to investigate the potential for accessory all-weather floor mats sold by Toyota to interfere with the accelerator pedal in MY 2007 Lexus ES350 vehicles. The investigation was based on a thorough review of complaints involving unintended acceleration that identified five incidents that likely were caused by interference between Toyota's accessory all-weather floor mat and the accelerator pedal. ODI upgraded the investigation to Engineering Analysis EA07-010 on August 8, 2007, and expanded the population to include MY 2007 and 2008 Lexus ES, ES350, and Toyota Camry vehicles. At that time, ODI had identified 17 complaints related to floor mat interference with the accelerator pedal in the subject vehicles.

ODI closed the investigation on October 11, 2007, after Toyota decided to conduct a recall of the accessory all-weather floor mats. Toyota's recall provided for the replacement of the accessory all-weather floor mats with mats that were redesigned to reduce the potential for pedal interference in the event that they were installed incorrectly. When EA07-010 was closed, ODI was aware of 26 Vehicle Owner Questionnaires ("VOQs" or "complaints") concerning incidents of unwanted acceleration involving accessory all-weather floor mat interference in MY 2007 and 2008 Lexus ES, ES350, and Toyota Camry vehicles, including seven crashes. Twenty of the complaints involved MY 2007 Lexus ES350 vehicles.

The following summarizes the issues cited by the petitioner as the bases for opening the requested investigations and ODI's assessment of each issue.

Issue #1: Toyota's response to ODI's April 5, 2007, information request (IR) letter in PE07-016 "may have been limited in some manner" by the definition of "Toyota" used in the IR.

The petitioner contends that since ODI's April 7, 2007, letter to Toyota requesting information in support of PE07-016 defined "Toyota" as "Toyota Motor North America, Inc." rather than "Toyota Motor Corporation," Toyota's responses "may have been limited in some manner by the failure to properly address the appropriate parties to the investigation."

The petitioner's concern is unfounded. In a May 14, 2009, letter responding to Mr. petition, Toyota confirmed that it "construed the request to apply to all Toyota entities, including the entities identified by Mr. and that its earlier responses included all nonprivileged responsive information and documents in the possession of all of those Toyota entities."

Issue #2 and Issue #3: The Agency failed to investigate allegations of unwanted acceleration that were not related to improper installation of the accessory all-weather floor mats.

In Issue #2, the petitioner contends that NHTSA should have investigated incidents of unintended acceleration that it determined were unrelated to improper installation of the accessory all-weather floor mat. In Issue #3, the petitioner contends that the scope of PE07-016 should have been "broadened or increased for additional causes beyond the all-weather floor mats" based on (1) information submitted by Toyota in its June 11, 2007, letter responding to ODI's information request, (2) additional complaints received by ODI after PE07-016 was opened; and (3) the results of a survey conducted for ODI by NHTSA's Vehicle Research and Test Center (VRTC) which "identified vehicles without all-weather car mats experiencing

unintended acceleration." ODI interprets these issues as one in the same—an allegation that the Agency failed to investigate complaints by subject vehicle owners that petitioner claims are unrelated to the recalled accessory all-weather floor mats.

ODI reviewed each complaint submitted by Toyota in its response to the PE07-016 IR and identified a safety defect trend related to interference between the accessory all-weather floor mat and the accelerator pedal that could trap the pedal near the floor during certain accelerator pedal applications (e.g., hard pedal applications while passing slower traffic, accelerating into traffic, and/or accelerating up grades). ODI carefully analyzed that data during the prior investigation and again during the review of this petition, including detailed interviews of drivers and, in some cases, field investigations to inspect vehicles and incident scenes. ODI determined that floor mat interference was the condition warranting investigation based on frequency of occurrence and nature of the events.

The petitioner identified ten complaints as evidence that "<u>not</u> all these incidents are related to an accessory all weather floor mat entrapping the throttle pedal." These complaints are presented in Table 1. The petitioner contends that the complaints that have a number marked with an asterisk are "five other VOQs where floor mats were not involved in the unwanted acceleration."

Contrary to the petitioner's contention, six of the VOQs were related to floor mat interference (four of the five that petitioner singled out as unrelated to floor mats were related to floor mats). Three of the remaining four complaints involved incidents occurring during lowspeed close-quarter driving maneuvers—circumstances that are not similar to those complained of by petitioner; the other complaint does not indicate an unintended acceleration event.