U.S. Department of Transportation

National Highway Traffic Safety Administration

ODI RESUME

OFFICE OF DEFECTS INVESTIGATION

NHTSA

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Investigation: EQ 10-002
Prompted by: 10V-017
Date Opened: 01/26/2010 **Date Closed:** 06/30/2010
Investigator: Alexander Ansley
Approver: George Person
Subject: CTS Corp Accelerator Pedal Assemblies

MANUFACTURER & PRODUCT INFORMATION

Manufacturer: CTS AUTOMOTIVE PRODUCTS
Products: ACCELERATOR PEDAL ASSEMBLIES W/ PPS OR PA46 FRICTION LEVERS
Population: Confidential

Problem Description: CERTAIN ACCELERATOR PEDAL ASSEMBLIES MAY BECOME HARD TO DEPRESS, SLOW TO RETURN TO IDLE WHEN RELEASED, OR REMAIN MECHANICALLY STUCK IN A DEPRESSED CONDITION.

FAILURE REPORT SUMMARY

	ODI	Manufacturer	Total
Complaints:	0	0	0
Crashes/Fires:	0	0	0
Injury Incidents:	0	0	0
Fatality Incidents:	0	0	0

ACTION / SUMMARY INFORMATION

Action: Close EQ

Summary:

On January 21, 2010, Toyota notified the NHTSA that it had decided certain model year 2007-2010 Toyota vehicles and certain MY 2009-2010 Pontiac vehicles contain a safety-related defect. Toyota stated that the accelerator pedal assemblies in those vehicles may become hard to depress, slow to return to idle when released, or may remain mechanically stuck in a partially depressed condition, increasing the risk of a vehicle crash. Further, Toyota stated that CTS Corporation (CTS) was the fabricating manufacturer of the defective accelerator pedal assemblies. NHTSA assigned recall number 10V-017 to this matter.

RMD mailed an IR letter to CTS on February 1, 2010 with 23 questions regarding the recalled accelerator pedals. The IR questions requested information such as quantities manufactured, complete customer lists, part number changes, test results, chronologies, and extensive communications between CTS and Toyota. The letter also asked if CTS planned to notify its purchasers of a safety-related defect in its accelerator pedals. RMD requested that the first 7 questions, those involving customers and quantities, be answered by February 3, 2010 and the remaining questions within 30 days.

After a granted extension request, CTS submitted its response to the first 7 questions on February 5, 2010. Confidentiality was granted by NHTSA's Chief Counsel's Office, but CTS detailed its customer list for all manufacturers it has sold accelerator pedals and listed all quantities sold. It was noted that subject pedals, those recalled by Toyota for containing a friction element of PPS or PA 4/6 material, were not sold to any other vehicle manufacturer.

CTS officials chose to travel to U.S. DOT on February 17, 2010 to meet with ODI personnel. CTS explained the history of producing accelerator pedals for Toyota and expanded on the construction of the recalled pedals. CTS explained the recall issue with example pedals and test videos and asserted that unintended acceleration and a "slower return to idle" are not the same problem. CTS expressed that, in its opinion, unintended acceleration is not an

issue with this pedal design, but, in rare cases in high humidity, there might be a slight delay in the return to idle position and that the pedal met the requirements of the applicable FMVSS even in that situation.

After another extension request in early March 2010, CTS was allowed to produce the answers to the remaining IR questions on a time table ending on April 30, 2010. Extensive records were submitted including long e-mail strings between CTS, CTS Japan, and various global Toyota organizations. Detailed accelerator pedal diagrams, testing procedures and results, pictures, videos, field return records, and warranty rate information were all submitted as requested. NHTSA's Office of the Chief Counsel notified CTS on April 27, 2010 to submit everything that it had prepared already, but not to gather any further information unless requested by the agency.

Virtually all of CTS' submissions were granted confidentiality as they contained sensitive business and commercial information. However, the core question of an Equipment Query investigation, whether the same or similar equipment was sold to any other vehicle manufacturer for inclusion in a new motor vehicle, was given in CTS' original submission on February 5, 2010. CTS did sell accelerator pedal assemblies to other vehicle manufacturers, but they were pedals of a different design consisting of different materials than those at issue in Toyota recall 10V-017 (and GM recall 10V-018 for the Pontiac Vibe).

(Continued on attachment)

EQ10-002 Summary Continuation

RMD also sent an IR letter to Toyota on June 17, 2010 requesting explanations as to discrepancies between Toyota's 10V-017 recall and CTS' submitted information. In CTS' submissions, 'subject' accelerator pedal assemblies were sold to Toyota for use in the Sienna mini-van, but Toyota did not recall the Sienna in 10V-017. Also, there was a discrepancy of 437,406 pedals between Toyota's recall (including the Vibe) and CTS' reported sales figures, after returns were counted.

Toyota responded to the IR on June 25, 2010 stating that the 2011 Siennas, the first Sienna model to use a CTS accelerator pedal assembly, were remedied with the recall repair before leaving the factory; and the factory switched to the new accelerator pedals using the POM material friction lever when they became available. As to the recall quantity discrepancy, Toyota stated that approximately 380,000 pedals were installed into vehicles destined for countries such as Canada, Mexico, etc and those vehicles have been recalled in those countries. Approximately 32,000 pedals received the recall remedy prior to leaving the factory or were disposed of in the factory. Approximately 12,000 pedals were used as service parts in the US, Canada, Mexico, etc. Toyota stated that the remainder (approximately 13,400) were likely disposed of by each vehicle factory as instructed.

CTS chose not to file a Part 573 Defect and Noncompliance Report with NHTSA as all defective equipment had already been recalled by Toyota.

As all defective CTS accelerator pedal assemblies were included in Toyota recall 10V-017 (and GM recall 10V-018 for the Pontiac Vibe), this EQ is closed.