U.S. Department
of Transportation
**National Highway
Traffic Safety
Administration**

1200 New Jersey Avenue SE
Washington, DC 20590

FEB 0 1 2010

Via Federal Express

NVS-215aa
EQ10-002
10V-017

Mr. Vinod M. Khilnani
Chairman of the Board and Chief Executive Officer
CTS Corporation
905 West Boulevard North
Elkhart, IN 46514

Mr. Richard G. Cutter III
Vice President, Secretary and General Counsel
CTS Corporation
905 West Boulevard North
Elkhart, IN 46514

Subject: Amended Information Request Letter to CTS Corporation

This letter is being sent to amend our information request sent via Federal Express on January 29, 2010, a copy of which was emailed to Mitch Walorski on February 1, 2010. Three questions are amended to correct inaccurate internal cross-references. Specifically, question 14 has been amended to reference question 13 (as opposed to question 11), question 16 has been amended to reference question 15 (as opposed to question 13), and question 18 has been amended to reference question 17 (as opposed to question 15).

Questions 1 through 7 remain unchanged and the deadline to provide the agency with answers to these questions remains **Wednesday, February 3, 2010**. Please provide your response to the remaining questions **within 30 days of receiving this letter**. If you have any questions, please contact Alex Ansley of my staff at (202) 493-0481, or by email at alexander.ansley@dot.gov.

Sincerely,

Kathleen C. DeMeter
Director, Office of Defects Investigation
Enforcement

U.S. Department
of Transportation
**National Highway
Traffic Safety
Administration**

1200 New Jersey Avenue SE
Washington, DC 20590

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Mr. Richard G. Cutter III
Vice President, Secretary and General Counsel
CTS Corporation
905 West Boulevard North
Elkhart, IN 46514

Dear Mr. Khilnani and Mr. Cutter:

In a letter dated January 21, 2010, Toyota Motor North America, Inc. notified the National Highway Traffic Safety Administration (NHTSA) that it had decided certain model year (MY) 2005–2010 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. A copy of Toyota's Defect Information Report, which identifies the vehicles with the defective accelerator pedal assemblies is attached. The Toyota vehicles containing the defective accelerator pedal assembly are also identified in the definition of subject component below

NHTSA's Office of Defects Investigation, Recall Management Division (RMD) is conducting a review related to this safety recall. A purpose of this review is to determine whether or not other vehicle manufacturers may have purchased or otherwise received from CTS the same or similar accelerator pedal assemblies as Toyota, which could be indicative of a safety-related defect in vehicles manufactured by other manufacturers. Another purpose is to determine what obligations CTS had under 49 CFR 573.3, 573.6 and whether it complied with any obligations thereunder. In addition, we seek to ensure that notice, as appropriate, is given to purchasers of CTS pedal assemblies so they are made aware of this safety recall and are able to determine the need for any similar safety recall. As part of our review, we are sending these information requests to CTS.

Unless otherwise stated in the text, the following definitions apply to these information requests.

- **CTS:** CTS Corporation, its parent corporation(s), subsidiary corporation(s) and affiliated corporation(s) in the United States and in foreign countries, all of their past and present officers and employees, whether assigned to their principal offices or any of its field or other locations, including all of their divisions, subsidiaries (whether or not incorporated) and affiliated enterprises and all of their headquarters, regional, zone and other offices and their employees, and all agents, contractors, consultants, attorneys and law firms and other persons engaged directly or indirectly (e.g., employee of a consultant) by or under the control of CTS (including all business units and persons previously referred to), were involved in any way with a Subject Component, Similar Component or Peer Component (as defined below):
  a. Design, engineering, analysis, modification or production (e.g. quality control);
  b. Testing, assessment or evaluation;
  c. Consideration, or recognition of potential or actual defects, reporting, record-keeping and information management, (e.g., complaints, field reports, warranty information, part sales), analysis, claims, or lawsuits;
  d. Communication with Toyota or communication to, from or intended for zone representatives, field engineers, fleets, dealers, or other field locations, including but not limited to people who have the capacity to obtain information from Toyota and other customers.

- **You** or **Your** refers to CTS.

- **Toyota**: Toyota Motor Corporation and all of its subsidiaries and affiliates including but not limited to Toyota Motor North America, Inc., Toyota Motor Engineering & Manufacturing North America, Inc., Toyota Motor Manufacturing , USA, Inc., Toyota Motor Manufacturing Indiana, Inc., Toyota Motor Manufacturing Texas, Inc., Toyota Motor Manufacturing Kentucky, Inc., Subaru of Indiana Automotive, Inc., Toyota Motor Manufacturing Canada, Inc., and New United Motor Manufacturing, Inc. (NUMMI).

- **Safety-related Defect:** Any sticking, binding or grabbing of the accelerator pedal assembly which could result in its becoming hard to depress, slow to return to idle when released, or which could cause it to become stuck in a partially depressed position.

- **Subject Component:** Accelerator pedal assemblies, containing a friction lever made of PPS or PA46 materials, which pedal assemblies were manufactured, supplied and/or sold by CTS for use/installation as original or replacement equipment on the vehicles listed in Toyota's Defect Information Report, including: MY 2007-2008 Toyota Tundra manufactured by Toyota Motors Manufacturing, Indiana, Inc. (TMMI); MY 2007-2010 Toyota Tundra manufactured by Toyota Motors Manufacturing, Texas, Inc. (TMMTX); MY 2008-2010 Toyota Sequoia manufactured by TMMI; MY 2005-2010 Toyota Avalon manufactured by Toyota Motors Manufacturing Kentucky, Inc.(TMMK); MY 2007-2010 Toyota Camry manufactured by TMMK or by Subaru of Indiana Automotive, Inc.; MY 2009-2010 Toyota Corolla manufactured by Toyota Motors Manufacturing Canada, Inc. (TMMC) or New United Motor Manufacturing, Inc. (NUMMI); MY 2009-2010 Toyota

Corolla Matrix manufactured by TMMC; MY 2009-2010 Toyota RAV4 manufactured by TMMC; MY 2010 Toyota Highlander manufactured by TMMI; MY 2009-2010 Pontiac Vibe manufactured by NUMMI; and any other vehicle that is now or becomes in the future subject to NHTSA Recall 10V-017.

- **Similar Component:** Accelerator pedal assemblies manufactured, supplied and/or sold by CTS, containing a friction lever made of PPS or PA46 materials, and intended for use/installation as original equipment or replacement equipment on any vehicle other than those identified in Toyota's Defect Information Report dated January 21, 2010.

- **Peer Component:** Accelerator pedal assemblies manufactured, supplied and/or sold by CTS intended for use/installation as original or replacement equipment on any vehicle other than those identified in Toyota's Defect Information Report.

- **Document:** "Document(s)" is used in the broadest sense of the word and shall mean all original written, printed, typed, recorded, or graphic matter whatsoever, however produced or reproduced, of every kind, nature, and description, and all non-identical copies of both sides thereof, including, but not limited to, papers, letters, memoranda, correspondence, communications, electronic mail (e-mail) messages (existing in hard copy and/or in electronic storage), faxes, notes, annotations, working papers, drafts, minutes, records, audio and video recordings, data, databases, other information bases, summaries, charts, tables, graphics, other visual displays, photographs, statements, interviews, opinions, reports, newspaper articles, studies, analyses, evaluations, interpretations, contracts, agreements, jottings, agendas, bulletins, notices, announcements, instructions, blueprints, drawings, as-builts, changes, manuals, publications, work schedules, journals, statistical data, desk, portable and computer calendars, appointment books, diaries, travel reports, lists, tabulations, computer printouts, data processing program libraries, data processing inputs and outputs, microfilms, microfiches, statements for services, resolutions, financial statements, governmental records, business records, personnel records, work orders, pleadings, discovery in any form, affidavits, motions, responses to discovery, all transcripts, administrative filings and all mechanical, magnetic, photographic and electronic records or recordings of any kind, including any storage media associated with computers, including, but not limited to, information on hard drives, floppy disks, backup tapes, and zip drives, electronic communications, including but not limited to, the Internet and shall include any drafts or revisions pertaining to any of the foregoing, all other things similar to any of the foregoing, however denominated by CTS, any other data compilations from which information can be obtained, translated if necessary, into a usable form and any other documents. For purposes of this request, any document which contains any note, comment, addition, deletion, insertion, annotation, or otherwise comprises a non-identical copy of another document shall be treated as a separate document subject to production. In all cases where original and any non-identical copies are not available, "document(s)"also means any identical copies of the original and all non-identical copies thereof. Any document, record, graph, chart, film or photograph originally produced in color must be provided in color. Furnish all documents whether verified by CTS or not.

If a document is not in the English language, provide both the original document and an English translation of the document.

Please provide CTS's response to the following questions. Please repeat each numbered question verbatim before stating the answer. After CTS's response to each request, identify the source of the information and indicate the last date the information was gathered.

1. Identify each and every manufacturer of motor vehicles and each and every manufacturer of motor vehicle equipment to which CTS supplied and/or sold accelerator pedal assemblies for use in motor vehicles sold or leased in the United States between 2004 and the present. For each such manufacturer, state: (a) the name of the entity, including the entity's subsidiaries and affiliates, that received CTS accelerator pedal assemblies; (b) the type of manufacturing business (e.g., motor vehicle manufacturer, motor vehicle equipment manufacturer, etc.); and (c) contact information for the manufacturer (including address, phone number, and contact person).

2. Separately, for each manufacturer identified in your answer to number 1, identify the vehicles, by make, model and model year, for which CTS supplied and/or sold accelerator pedal assemblies.

3. Separately, for each make, model and model year vehicle identified in your response to number 2, state the accelerator pedal assembly part numbers (Toyota part number and CTS part number) and dates of sale, dates of shipment and, for each, quantity sold and or shipped. To the extent that a pedal assembly could be used in different model vehicles, in your answer, you may group the vehicles and models in order to state a complete and accurate answer that covers all pedals, part numbers and shipments.

4. Identify each and every pedal assembly by CTS part number that CTS has sold or sells that is original equipment, as defined in 49 U.S.C. 30102(b)(1)(C). Identify the entities to which CTS has sold and or shipped each pedal assembly that is original equipment.

5. Separately, for each accelerator pedal assembly identified in your response to number 4, by Toyota/CTS part number, state whether the accelerator pedal assemblies is: (a) a Subject Component, (b) a Similar Component, and/or (c) a Peer Component (as defined above).

6. Identify each and every pedal assembly by CTS part number that CTS has sold or sells that is replacement equipment, as defined in 49 U.S.C. 30102(b)(1)(D). Identify the entities to which CTS has sold and or shipped each pedal assembly that is replacement equipment.

7. Separately, for each accelerator pedal assembly identified in your response to number 6, by Toyota/CTS part number, state whether the accelerator pedal assemblies is: (a) a Subject Component, (b) a Similar Component, and/or (c) a Peer Component (as defined above).

8. Separately, for each accelerator pedal assembly that is a Similar Component, as indicated in your response to number 5, describe in detail each similarity between that pedal assembly and Subject Component(s), and each difference between that pedal assembly and Subject Component(s). Describe how the similarity(ies) and difference(s) relate to the operation of the accelerator pedal assembly and the safety-related defect. As used in this information request, similarities and differences include but are not limited to the structure of accelerator pedal design, friction lever, mechanical operation, materials that parts are made from (e.g., PPS or PA46 materials), electrical operation, and any aspects of design or operation (including operation after wear or when moist or wet) that relates to sticking, binding or grabbing of the accelerator pedal assembly which could result in its becoming hard to depress, slow to return to idle when released, or which could cause it to become stuck in a partially depressed position.

9. Separately, for each accelerator pedal assembly that is a Peer Component as indicted in your response to number 5, but is not a Similar Component, describe in detail each similarity between that pedal assembly and Peer Component(s), and each difference(s)) between that pedal assembly and Peer Component(s). Describe how the similarity(ies) and difference(s) relate to the operation of the accelerator pedal assembly and the safety-related defect. As used in this information request, similarities and differences include but are not limited to the structure of accelerator pedal design, friction lever, mechanical operation, materials that parts are made from (e.g., PPS or PA46 materials), electrical operation, and any aspects of design or operation (including operation after wear or when moist or wet) that relates to sticking, binding or grabbing of the accelerator pedal assembly which could result in its becoming hard to depress, slow to return to idle when released, or which could cause it to become stuck in a partially depressed position.

10. State when CTS first became aware that a Subject Component experienced any sticking, binding or grabbing of the accelerator pedal assembly. In addition, state when CTS first became aware that a Subject Component experienced any sticking, binding or grabbing of the accelerator pedal assembly which resulted or could result in its becoming hard to depress, slow to return to idle when released, or which caused or could cause it to become stuck in a partially depressed position. State in detail how CTS became aware of the sticking, binding or grabbing.

11. Describe in chronological order each and every communication to and from Toyota, including Toyota subsidiaries in the United States, Canada, Europe and Asia, regarding Subject Component(s) or similar components that experienced or experience any sticking, binding or grabbing of the accelerator pedal assembly.

12. Produce each and every document that is or relates to a communication between CTS and Toyota regarding Subject Component(s) that experienced or experience any sticking, binding or grabbing of the accelerator pedal assembly.

13. Describe all assessments, analyses, tests, test results, studies, surveys, simulations, investigations, inquiries and/or evaluations (collectively, "actions") that relate to, or may relate to, the safety-related defect in a Subject Component that have been conducted, are

being conducted, are planned, or are being planned by, or for, CTS. For each such action, provide the following information:

a. Action title or identifier;
b. The actual or planned start date;
c. The actual or expected end date;
d. Brief summary of the subject and objective of the action;
e. Engineering group(s)/supplier(s) responsible for designing and for conducting the action; and
f. A brief summary of the findings and/or conclusions resulting from the action.

If any of the above actions resulted in the change of part numbers of any accelerator pedal assembly, detail the part number before and after the change as well as the customers that were sold those accelerator pedals.

14. For each action identified in your response to number 13, produce copies of all documents related to the action, regardless of whether the documents are in interim, draft, or final form. Organize the documents chronologically by action.

15. Describe all assessments, analyses, tests, test results, studies, surveys, simulations, investigations, inquiries and/or evaluations (collectively, "actions") that relate to, or may relate to, a safety-related defect in a Similar Component that have been conducted, are being conducted, are planned, or are being planned by, or for, CTS. For each such action, provide the following information:

a. Action title or identifier;
b. The actual or planned start date;
c. The actual or expected end date;
d. Brief summary of the subject and objective of the action;
e. Engineering group(s)/supplier(s) responsible for designing and for conducting the action; and
f. A brief summary of the findings and/or conclusions resulting from the action.

If any of the above actions resulted in the change of part numbers of any accelerator pedal assembly, detail the part number before and after the change as well as the customers that were sold those accelerator pedals.

16. For each action identified in your response to number 15, produce copies of all documents related to the action, regardless of whether the documents are in interim, draft, or final form. Organize the documents chronologically by action.

17. Describe all assessments, analyses, tests, test results, studies, surveys, simulations, investigations, inquiries and/or evaluations (collectively, "actions") that relate to, or may relate to, a safety-related defect in a Peer Component that have been conducted, are

being conducted, are planned, or are being planned by, or for, CTS. For each such action, provide the following information:

a. Action title or identifier;
b. The actual or planned start date;
c. The actual or expected end date;
d. Brief summary of the subject and objective of the action;
e. Engineering group(s)/supplier(s) responsible for designing and for conducting the action; and
f. A brief summary of the findings and/or conclusions resulting from the action.

If any of the above actions resulted in the change of part numbers of any accelerator pedal assembly, detail the part number before and after the change as well as the customers that were sold those accelerator pedals.

18. For each action identified in your response to number 17, produce copies of all documents related to the action, regardless of whether the documents are in interim, draft, or final form. Organize the documents chronologically by action.

19. Describe all modifications or changes made by, or on behalf of, CTS in the structure of the accelerator pedal design, other design, material composition, manufacture, quality control, supply, or installation of a Subject Component, Similar Component, and/or Peer Component from the start of production to date, which relate to, or may relate to, the safety-related defect in the vehicles listed in Toyota's Defect Information Report, and/or any other vehicles sold or leased in the United States. For each such modification or change, provide the following information:

a. The date or approximate date on which the modification or change was incorporated into vehicle production;
b. A detailed description of the modification or change;
c. The reason(s) for the modification or change;
d. The part numbers (Toyota (or other vehicle manufacturer) and CTS, service and engineering) of the original component;
e. The part number (Toyota (or other vehicle manufacturer) and CTS, service and engineering) of the modified component;
f. Whether the original unmodified component was withdrawn from production and/or sale, and if so, when;
g. When the modified component was made available as a service component; and
h. Whether the modified component can be interchanged with earlier production components.

Also, provide the above information for any modification or change that CTS is aware of which may be incorporated into its production within the next 120 days.

20. State the total number of the accelerator pedal assemblies manufactured by CTS that may possibly exhibit the safety-related defect. Identify quantities that have been shipped by CTS to others and quantities still within direct control of CTS, with applicable part numbers listed for each quantity. Also state separately whether the quantities shipped are Subject Components, Similar Components, and/or Peer Components.

21. State CTS's assessment of the alleged defect in the Subject Component, including:

    a. The causal or contributory factor(s);
    b. The failure mechanism(s);
    c. The failure mode(s);
    d. The failure consequence(s); i.e., the operation of a vehicle when equipped with an accelerator pedal assembly that becomes harder to depress, slower to return, or mechanically stuck in a partially depressed position; and
    e. The risk to motor vehicle safety that the Subject Component poses.

22. State whether or not CTS has or intends to notify its purchasers, dealers and distributors of a safety-related defect in any accelerator pedals it has manufactured, under 49 U.S.C. § 30118(c) and 49 CFR part 573.

23. Produce copies of all communications sent from and received by CTS that relate to or may relate to the safety related defect (including the performance and durability of the subject component), including but not limited to such communications between CTS and Toyota and between employees and/or entities within CTS (e.g., any such communications between CTS Corporation and a subsidiary).

This letter is being sent to CTS pursuant to 49 U.S.C. § 30166, which authorizes NHTSA to conduct any investigation that may be necessary to enforce Chapter 301 of Title 49 and to request reports. CTS's failure to respond promptly and fully to this letter could subject CTS to civil penalties pursuant to 49 U.S.C. § 30165 of up to $6,000 per day, with a maximum of $16,375,000 for a related series of violations, for failing or refusing to perform an act required under 49 U.S.C. § 30166. *See* 49 CFR 578.6. This includes failing to respond to ODI information requests. It could also lead to an action to compel CTS to respond.

If your company claims that any of the information or documents provided in response to this information request constitute confidential commercial material within the meaning of 5 U.S.C. § 552(b)(4), or are protected from disclosure pursuant to 18 U.S.C. § 1905, your company must submit supporting information together with the materials that are the subject of the confidentiality request, in accordance with 49 CFR Part 512, as amended to the Office of Chief Counsel (NCC-111), National Highway Traffic Safety Administration, Room W41-227, 1200 New Jersey Avenue, S.E., Washington, D.C. 20590. Your Company is required to submit two copies of the documents containing asserted confidential information (except only one copy of blueprints) and one copy of the documents from which information claimed to be confidential has been deleted. Please remember that the words "CONFIDENTIAL BUSINESS INFORMATION" must appear at the top of each page containing information claimed to be confidential, and the information must be clearly identified in accordance with 5 U.S.C. § 512.6.

CTS's response to this letter, in duplicate, together with a copy of any confidentiality request, must be submitted to this office by CTS. Please refer to EQ10-002 in CTS's response to this letter. If CTS finds that it is unable to provide all of the information requested within the time allotted, CTS must request an extension from me at (202) 366-5210 no later than five business days before the response due date. If CTS is unable to provide all of the information requested by the original deadline, it must submit a partial response by the original deadline with whatever information CTS then has available, even if an extension has been granted.

Your company's written response to questions 1 through 7 must be received by this office no later than Wednesday, February 3, 2010. Your company's written response to the remaining questions must be submitted to this office within 30 days of receiving this letter. If you have any questions concerning this information request, please contact Alex Ansley of my staff at (202) 493-0481 or by e-mail at alexander.ansley@dot.gov. Response submission may be made by US Mail, fax (202) 366-7882, or e-mail rmd.odi@dot.gov.

Sincerely,

Kathleen C. DeMeter
Director, Office of Defects Investigation
Enforcement

Enclosure

RECEIVED
By Recall Management Division at 4:20 pm, Jan 21, 2010

TOYOTA

TOYOTA MOTOR NORTH AMERICA, INC.

WASHINGTON OFFICE
601 THIRTEENTH STREET, NW, SUITE 910 SOUTH, WASHINGTON, DC 20005

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

January 21, 2010

10V-017
(5 Pages)

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

Re: Accelerator Pedal Assembly Issue on Certain Vehicles
Part 573, Defect Information Report

Dear Mr. Smith:

In accordance with the requirements of the National Traffic and Motor Vehicle Safety Act of 1966 and 49 CFR Part 573, on behalf of Toyota Motor Corporation ["TMC"], we hereby submit the attached Defect Information Report concerning a voluntary safety recall of certain Toyota Tundra, Sequoia, Avalon, Camry, Corolla, Matrix, RAV4, Highlander, and Pontiac Vibe vehicles. Toyota has determined that a defect exists in the accelerator pedal assembly which may result in the accelerator pedal becoming harder to depress, slower to return, or, in the worst case, mechanically stuck in a partially depressed position.

Should you have any questions about this report, please contact me at (202) 775-1707.

Sincerely,

TOYOTA MOTOR NORTH AMERICA, INC.

Chris Santucci
Manager
Technical & Regulatory Affairs

DEFECT INFORMATION REPORT

1. Vehicle Manufacturer Name:

Toyota Motor Manufacturing, Indiana, Inc. ["TMMI"]
4000 South Tulip Tree Drive, Princeton, IN 47670-4000

Toyota Motor Manufacturing, Texas, Inc. ["TMMTX"]
1 Lone Star Pass San Antonio, Texas 78264-3413

Toyota Motor Manufacturing Kentucky, Inc.["TMMK"]
1001 Cherry Blossom Way, Georgetown, KY 40324

Toyota Motor Manufacturing Canada Inc. ["TMMC"]
1055 Fountain Street North, Cambridge, Ontario, Canada N3H 5K2

New United Motor Manufacturing, Inc. ["NUMMI"]
45500 Fremont Boulevard Fremont, CA 94538-6368

Subaru of Indiana Automotive, Inc. ["SIA"]
5500 State Road 38 East, Lafayette, Indiana 47905

Affiliated U.S. Sales Company

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

General Motors Corporation Global Headquarters ["GM"]
100 Renaissance Center Drive, PO. Box 100 Detroit, MI 48265

Component Containing Defect

Accelerator Pedal Assembly containing a Friction Lever made of PPS or PA46 materials
CTS Corporation
Streetsville, ON. L5M1Y9

2. Identification of Affected Vehicles:
Based on production records, we have determined the affected vehicle population as in the table below.

Make/ Car Line	Model Year	Manufac-turer	VIN		Production Period
			VDS	VIS	
Toyota Tundra	2007 - 2008	TMMI	TBD	TBD	TBD
	2007 - 2010	TMMTX	TBD	TBD	TBD
Toyota Sequoia	2008 - 2010	TMMI	TBD	TBD	TBD
Toyota Avalon	2005 - 2010	TMMK	TBD	TBD	TBD
Toyota Camry	2007 - 2010	TMMK SIA	TBD	TBD	TBD
Toyota Corolla	2009 - 2010	TMMC NUMMI	TBD	TBD	TBD
Toyota Corolla Matrix	2009 2010	TMMC	TBD	TBD	TBD
Toyota RAV4	2009 2010	TMMC	TBD	TBD	TBD
Toyota Highlander	2010	TMMI	TBD	TBD	TBD
Pontiac Vibe	2009 2010	NUMMI	TBD	TBD	TBD

3. Total Number of Vehicles Potentially Affected:

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 about 2.3 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. Percentage of Vehicles Estimated to Actually Experience Malfunction:

Unknown

5. Description of Problem:

Due to the manner in which the friction lever interacts with the sliding surface of the accelerator pedal inside the pedal sensor assembly, the sliding surface of the lever may become smooth during vehicle operation. In this condition, if condensation occurs on the surface, as may occur from heater operation (without A/C) when the pedal assembly is cold, the friction when the accelerator pedal is operated may increase, which may result in the accelerator pedal becoming harder to depress, slower to return, or, in the worst case, mechanically stuck in a partially depressed position. In addition, some of the affected vehicles' pedals were manufactured with friction levers made of a different material (PA46), which may be susceptible to humidity when parked for a long period in hot temperatures. In this condition, the friction when the accelerator pedal is operated may increase, which may result in the accelerator pedal movement becoming rough or slow to return. In light of the similarity with one of the symptoms described above that are associated with the PPS material, Toyota has decided to include these vehicles in the defect determination.

6. Chronology of Principal Events:

March 2007 – June 2008

Starting in March 2007, Toyota received field technical information regarding reports of accelerator pedals demonstrating symptoms such as rough operation or being slow to return to the idle position. These reports were limited to one model (Tundra), and the accelerator pedal assemblies in those vehicles contained a friction lever made of the PA46 material. Toyota's investigation found that the PA46 material was susceptible to humidity, which could cause the friction lever to absorb moisture and swell. Environmental testing was conducted in order to understand the full impact of the swelling of the friction lever due to humidity. In February 2008, the material of the friction arm was changed to PPS while investigations continued. In June 2008, Toyota concluded that while accelerator pedal feeling could change under certain conditions, Toyota considered it to be a drivability issue unrelated to safety.

December 2008 – August 2009

Toyota received field technical information from the European market which indicated reports of accelerator pedal sticking on vehicles equipped with pedals containing the PPS material. The reports predominantly involved right hand drive versions of the Toyota Aygo and Yaris vehicles. Toyota began a detailed investigation with an evaluation of returned accelerator pedals in March 2009. Internal inspection of the sliding surface of the friction lever and the pedal arm was found to be partially smooth. Toyota conducted some duplication tests, and it was found that the internal friction could increase if moisture was attached to the sliding surface of the friction lever as the surface became smooth. This made the accelerator pedal stick in a partially depressed position under the condition where condensation occurs on the accelerator pedal (i.e. for several minutes during heater operation after the engine is started in cold temperatures). In addition, in the condition where A/C is operated, the phenomenon did not occur. At this time, it appeared to be a phenomenon predominantly limited to right hand drive vehicles, without A/C equipment, based on the location of the accelerator pedal and the heater duct. Based on the investigation results above, Toyota lengthened the arm of the friction lever and changed its material to prevent smoothing on all vehicles produced in Europe with the subject accelerator pedals starting in mid-August 2009.

October 2009 – January 2010

Toyota received field technical information from the U.S. and Canadian markets which indicated reports of sticking accelerator pedals had occurred. Toyota recovered parts in order to evaluate the phenomenon. The returned accelerator pedals have the same material friction lever as previously used in the European models (PPS) and, as a result of the internal investigation, Toyota decided to conduct a voluntary safety recall of all vehicles with the subject accelerator pedals. This recall will include vehicles equipped with friction levers made with PPS material, as well as with the PA46 material, which was associated with the rough operation or slow to return symptoms.

7. Description of Corrective Repair Action:

Toyota will inform the details of the repair action as soon as it is available.

Reimbursement Plan for pre-notification remedies

TBD

8. Recall Schedule:

TBD

9. Distributor/Dealer Notification Schedule:

TBD