

May 13, 2011

12. For MY2006 inverter and converter integrated system architecture, provide the following:
- a. Toyota complete system specification requirements document;
 - b. Supplier system specification requirements and software requirements documents;
 - c. Toyota system vehicle test requirements document;
 - d. Supplier system test requirements document;
 - e. System DRBFM and fault tree for inverter/converter in PDF or Microsoft excel;
 - f. System DRBFM and fault tree for inverter/converter for MY2009 if modified from MY2006; and
 - g. System DV and PV test plan, DV/PV test matrix and final DV and PV test report for MY 2006.

Response 12

Toyota is providing the English versions of the complete inverter system specification requirements in "Attachment-Response 12a_E." For subparts "e" and "f", the English versions of the inverter system FMEA/DRBFM documents are provided in "Attachment-Response 12e_E" and "Attachment-Response 12f_E". The original Japanese versions of these documents are being provided in "Attachment-Response 12a_J", "Attachment-Response 12e_J", and "Attachment-Response 12f_J."

Please note that the information included in the "Attachment-Response 12a", "Attachment-Response 12e", and "Attachment-Response 12f" is confidential, and a request for confidential treatment has been submitted to the Office of Chief Counsel. Public versions of these attachments are included with this response to your office, provided on CD-ROM stored in the folder "ATT_1". Please see the Office of Chief Counsel for the confidential version of this document.

For subparts "b" and "d", Toyota has not located any information deemed responsive to the request.

For subparts "c" and "g", Toyota will provide information or documents related to this response in supplemental submissions by May 20..

In the foregoing responses to this Information Request ("IR"), information has been obtained from those departments and employees knowledgeable about the subject matter of this inquiry most likely to have such information in the regular and ordinary course of business. When a particular Request seeks "documents" as defined in the IR, reasonable, good faith searches have been made of corporate records where such documents would ordinarily be expected to be found and to which Toyota would ordinarily refer when looking for such information.

The definitions of "documents" and "Toyota", however, are unreasonably broad, vague, and ambiguous, and Toyota objects to such definitions, because they exceed a reasonable understanding of such terms. For example, "calendars", "travel reports", "contracts" and "personnel records", to name a few, would not normally contain responsive information pertaining to the alleged defect subject of this inquiry. Toyota has also not provided information from electronic files that require extraordinary or expert means to retrieve that are generally unavailable to the computer user.

In addition, Toyota has not provided information from persons or entities over which it does not ordinarily exercise control, such as independent suppliers and contractors. Toyota also objects to the definition of "Toyota" to the extent it purports to include outside counsel. It would be unduly burdensome to require Toyota to request that outside counsel search files for responsive documents. Moreover, it is highly unlikely that outside counsel would possess any non-privileged documents responsive to this IR that are not already being produced by Toyota. In light of the significant burden and cost associated with canvassing outside counsel for potentially responsive documents and the very low probability of identifying any non-privileged document not already being produced, Toyota has not asked its outside counsel to search for responsive documents.

Toyota understands this IR to seek information on vehicles manufactured for sale in the United States and its territories. Also, we understand documents specifically related to the preparation of the responses are not sought.

The source of information used as a basis for the data in each Attachment, including the date the data were updated and retrieved, is identified above as applicable. If a document itself is the source for the requested information and it is provided, no further source identification is provided. If a document, drawing or component is requested, or if no responsive information is available, we assume no further source identification is called for.

Toyota is not providing privileged documents that may be responsive to this Information Request. With regard to claims of privilege, Toyota understands that it is acceptable to the Agency for Toyota to identify

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

Toyota understands that NHTSA will protect any private information about persons that is contained in the Attachments to this response, based on privacy considerations. Such private information includes data such as names, addresses, phone or fax numbers, email addresses, license plate numbers, driver's license numbers and the last 6 digits of a vehicle's VIN.

CONFIDENTIAL BUSINESS INFORMATION

Attachment-Response 12a
Attachment-Response 12e
Attachment-Response 12f

Entire Documents Confidential

Confidential Information Removed