

# TOYOTA

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Toyota Motor Engineering &  
Manufacturing North America, Inc.

Vehicle Safety & Compliance  
Liaison Office  
Mail Code: S-104  
19001 South Western Avenue  
Torrance, CA 90501

July 11, 2013

Gregory Magno, Chief  
Defects Assessment Division NVS-200  
Office of Defects Investigation  
National Highway Traffic Safety Administration  
1200 New Jersey Avenue, SE, W48-334  
Washington, DC 20590

Re: NVS-211snc; DP13-001

Dear Mr. Magno:

On behalf of Toyota Motor Corporation, this letter is being sent in response to your June 4, 2013 letter regarding DP13-001, a Defects Petition. Enclosed you will find the summary of 12 VOQ's and the complete response and CD's with the attachments for your convenience.

Should you have any questions about this response, please contact me at (310) 468-8555.

Sincerely,



Abbas Saadat  
Vice President

Toyota Motor Engineering & Manufacturing  
North America, Inc.

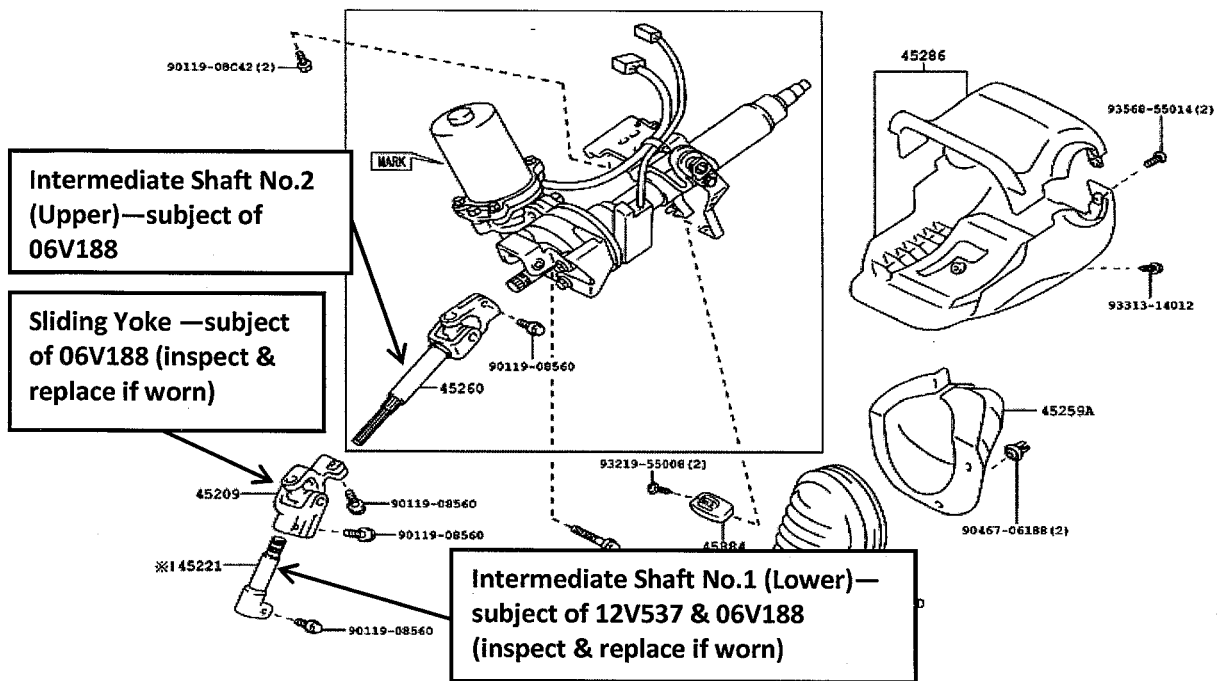
Enclosures

Enclosure 1:

Summary of VOQ's

Enclosure 2:

Response including Attachments



### SUMMARY OF VOQ'S

#### 1. 10168043 JTDKB20UX53

Recall campaign 60C (06V188) was performed on August 29, 2006, and a new Intermediate Shaft No. 2 with Sliding Yoke (P/N 04005-72147) was installed on the vehicle. On September 12, 2006, customer submitted a VOQ stating that "Total failure of steering" and the "Steering wheel just spun freely." On the same day, the customer reported the issue to Toyota stating that "hesitant to return vehicle to the dealer who might have caused the concern and will not return vehicle to that dealer." Toyota offered to escalate the case; however, the customer declined. On September 19, 2006, the vehicle was returned to the same dealership where the remedy had been performed, and the dealer installed another new intermediate shaft No.2 with Sliding Yoke (P/N 04005-72147). The dealer noted in the repair order that "improper installation of components performed as part of recall." The vehicle is within the scope of C0T (12V537), but the remedy has not yet been performed.

#### 2. 10418710 JTDKB20UX40

Recall campaign 60C (06V188) was performed on August 15, 2006, and a new Intermediate Shaft No. 2 with Sliding Yoke (P/N 04005-72147) was installed. On August 6, 2011, the customer filed a VOQ stating that "service advisor indicated that steering yoke sub assembly and shaft assembly needed to be replaced because of binding." The repair order shows that the dealer replaced both Intermediate Shaft No.2 (P/N 45260-47052) and Sliding Yoke (P/N 45209-12201). On April 15, 2013, a repair order indicates that the bolt was replaced under recall campaign C0T (12V537). Increased backlash and

abnormal noise from the steering system are the precursors of spline wear; a binding condition is unlikely related to recall campaigns 60C and C0T.

**3. 10478195 JTDKB20U357 [REDACTED]**

On June 27, 2006, the 60C (06V188) remedy was performed on this vehicle, and a new Intermediate Shaft No. 2 with Sliding Yoke (P/N 04005-72147) was installed. On October 1, 2012, the customer filed a VOQ stating that "the steering intermediate shaft splines were worn" and the incident occurred on August 19, 2012. On the same day, the customer reported the issue to Toyota stating that "the steering wheel column was replaced again at an independent shop." On January 30, 2013, the customer sent a letter to Toyota seeking pre-notification reimbursement for the August 20, 2012 repair under recall campaign C0T (12V537). On March 26, 2013, Toyota denied the reimbursement case as C0T is not related to Intermediate Shaft No.2.

**4. 10407520 JTDKB20U157 [REDACTED]**

On March 22, 2007, the 60C (06V188) remedy was performed, and a new Intermediate Shaft No. 2 with Sliding Yoke (P/N 04005-72147) was installed. The customer filed a VOQ on June 20, 2011, stating that the vehicle was taken to a dealer on May 6, 2011 due to wobbles in the steering. The dealer did not find any problem with the steering, and advised the customer that the issue could be related to imbalanced snow tires. On May 26, 2011, the customer experienced "complete steering failure" and "the steering wheel spun unlimited number of times." The repair order dated May 28, 2011 shows that the vehicle was repaired with a new Intermediate Shaft No. 2 with Sliding Yoke (P/N 04005-72147) and a Cable Sub-Assy Spiral (P/N 84306-0E010). We do not have sufficient information to determine whether this repair may have been related to the March 22, 2007 repair or the May 6, 2011 complaint, but the customer was reimbursed for the repair expense as goodwill on October 26, 2011. The vehicle is within the scope of C0T (12V537), and the remedy was performed on January 16, 2013. The repair order indicates that the bolt was replaced.

**5. 10478053 JTDKB20U267 [REDACTED]**

The repair order submitted on August 19, 2010 shows that the customer stated the "steering wheel very creaky" and the dealer advised to have the spiral cable replaced. On October 1, 2012, the customer filed a VOQ stating that "while reversing at 5mph, the power steering assist failed and the steering wheel could not be moved in either direction." Toyota also received a consumer complaint on September 17, 2012 stating that the "steering shaft is bent." Based on the Repair Order dated September 14, 2012, the vehicle was repaired with a new bolt w/washer (P/N 90080-11555), Intermediate Shaft No.1 (P/N 45221-47041), Yoke, Sub-Assy Steering Sliding (P/N 45209-12201), Post Assy, Electric Power Steering (P/N 45200-47063 which includes Steering Column & Intermediate Shaft No.2), and Cable Sub-Assy Spiral(P/N 84306-0E010). Because the majority of the steering system components were replaced at once, it is difficult to determine the primary cause of the steering concern. However, a steering binding or bent condition is unlikely related to recall campaigns 60C and C0T. The vehicle is within the scope of C0T (12V537), but the remedy has not yet been completed. On January 25, 2013, the customer sent a letter to Toyota seeking pre-recall reimbursement for the September 14, 2012 repair under recall campaign C0T (12V537). On April 9, 2013, the customer was reimbursed for the repair expense of Intermediate Shaft No. 1.

**6. 10473654 JTDKB20U063**

Based on a Carfax report, the vehicle was involved in a collision, and a salvage title was recorded on April 3, 2007. The customer submitted a VOQ on September 3, 2012 stating that the "steering shaft completely failed and vehicle could not be controlled or steered." The vehicle is not in the scope of the 60C (06V188) recall campaign. On February 13, 2013, the vehicle was inspected under recall campaign C0T (12V537), and a new bolt (P/N 04002-52112) was installed in the vehicle. Toyota does not have any additional information related to the collision in 2007, the salvage title record, or the steering concern in 2012. On February 27, 2013, Toyota received a pre-recall reimbursement request from the customer. On April 19, 2013, the customer was reimbursed for the repair cost for the parts listed in the recall campaign C0T.

**7. 10429551 JTDKB20UX77**

On August 4, 2007, a repair order indicates that the customer requested a new wheel rim due to damage. The customer submitted a VOQ on October 12, 2011 stating that "steering column shaft connection to the gearbox steering rack failed." The repair order dated September 30, 2011 shows that Intermediate Shaft No.1 (P/N 45221-47041), Cable Sub-Assy, Spiral (P/N 84306-0E010), and Gear Assy, Steering (P/N 45510-47021) were replaced. The vehicle is not in the scope of recall campaign 60C (06V188). On January 24, 2013, the customer sent a letter to Toyota seeking pre-recall reimbursement for the September 30, 2011 repair under recall campaign C0T (12V537). Toyota advised the customer to have C0T completed to ensure the customer has the most up to date part. On April 15, 2013, C0T (12V537) was performed on the vehicle and Intermediate Shaft No.1 (P/N 04001-41212) was replaced. On April 23, 2013 the customer was reimbursed for the repair expense related to the September 2011 repair. Toyota also offered a goodwill reimbursement for the parts not part of recall campaign C0T. There is insufficient information available for Toyota to provide any further comments.

**8. 10400074 JTDKB20UX93**

Based on a Carfax report, the vehicle was involved in a collision which was reported on August 5, 2009, and a salvage title was recorded on September 4, 2009. In the VOQ filed on May 5, 2011, the customer stated "hit a curb and the lost all steering." This incident reportedly occurred on April 29, 2011. The repair order dated May 3, 2011 shows that the vehicle was repaired with an Intermediate Shaft No.1 (P/N 45221-47041), and Cable Sub-Assy, Spiral (P/N 84306-0E010). The vehicle is not in the scope of recall campaign 60C (06V188). Toyota does not have any additional information related to the collision in 2009, the salvage tile record, or the steering concern in 2011. On February 7, 2013, recall campaign C0T (12V537) was performed on the vehicle, and the Steering Shaft Bolt was replaced. On February 7, 2013, the customer sent a fax to Toyota seeking pre-recall reimbursement for the May 3, 2011 repair under recall campaign C0T (12V537), and reimbursement consideration is in progress.

**9. 10484757 JTDKB20U753**

Recall campaign 60C (06V188) was performed on June 23, 2006, and Intermediate Shaft No.2 (P/N 04005-72247) was installed. On August 15, 2012, the vehicle was involved in an accident. In the VOQ dated November 15, 2012, the customer stated that the "the steering became hard to control, which caused the vehicle swerved to the left." A Toyota field technical report related to this accident was completed on

February 21, 2013. The vehicle has been inspected at a salvage yard, which purchased the vehicle from the customer's insurance company after the crash. Some steering components were unavailable and the vehicle could not be moved. The steering wheel could be turned and the steering rack functioned, but was no longer connected to the steering knuckles, which had been removed. The vehicle would have been within the scope of C0T (12V537).

**10. 10489425 JTDKB20U853** [REDACTED]

Recall campaign 60C (06V06188) was performed on June 29, 2006. Intermediate Shaft No.2 with Sliding Yoke (P/N 04005-72147) was installed on the vehicle. On December 20, 2012, the customer filed a VOQ stating that "when I made a turn either left or right that I heard and felt a clanking sound coming from the steering column." On January 4, 2013, the customer took the vehicle into an independent shop and had the Intermediate Shaft No.2 (P/N 45260-47052) replaced. The vehicle is also within the scope of recall campaign C0T (12V537), but the vehicle has not been remedied. On January 17, 2013, the customer sent a letter to Toyota seeking pre-recall reimbursement for the January 4, 2013 repair under recall campaign C0T (12V537). On April 10, 2013, Toyota denied reimbursement due to lack of supporting documents. There is insufficient information available for Toyota to provide any further comments.

**11. 10499778 JTDKB20U573** [REDACTED]

The customer filed a VOQ on February 23, 2013 stating that "I heard a loud 'pop' and my car lost steering completely and immediately." On February 26, 2013, recall campaign C0T (12V537) was performed, and Cable Sub-Assy, Spiral (P/N 84306-0E010), Gear Assy, Steering (P/N 45510-47021), Intermediate Shaft No.1 (P/N 04001-41212) were replaced. This VIN is not in the scope of recall campaign 60C. Based on the available information, the steering concern appears to be related to recall campaign C0T (12V537).

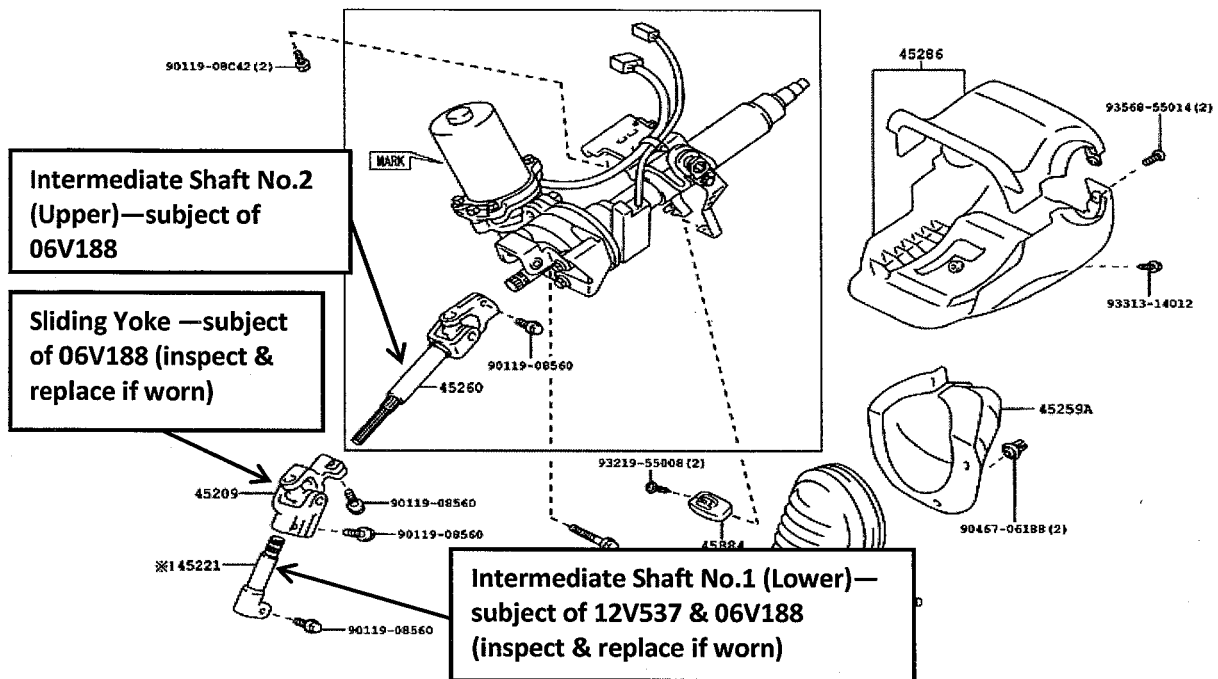
**12. 10510722 JTDKB20UX5** [REDACTED] **(Additional VOQ)**

Recall campaign 60C (06V188) was performed on January 14, 2011, and a new Intermediate Shaft No. 2 with Sliding Yoke (P/N 04005-72147) was installed on the vehicle. On May 5, 2013, the customer filed a VOQ stating that "lost steering" on May 1, 2013. The repair order dated May 2, 2013 says "Found steering intermediate shaft yolk lower splines stripped and rotating." The recall campaign C0T (12V537) was also performed during the same vehicle repair, and Intermediate Shaft No.1 (P/N 04001-41212) was replaced. Customer contacted Toyota on May 6, 2013 to discuss the recall reimbursement process. Based on the available information, the steering concern may be related to recall campaign C0T (12V537).

**Conclusion:**

Based on available information, only four (VOQ's 10168043, 10478195, 10407520, and 10489425) out of 12 VOQ's appear to be related to a concern about Steering Intermediate Shaft Assembly No. 2. For those four cases, there is not enough information to determine if the steering allegation relates to a decoupling and/or separation of the Steering Intermediate Shaft Assembly No.2 from the steering column assembly. Of the remaining eight VOQ's, five (VOQ's 10473654, 10429551, 10400074, 10499778, and 10510722) appear to be related to other pre-remedy issues covered by the latest recall campaign C0T

(12V537) and three (VOQ's 10418710, 10478053, and 10484757) appear to be isolated incidents most likely unrelated to decoupling or separation of Intermediate Shaft No.1 (Upper) or No.2 (Lower). There is no observable trend.



## SUMMARY OF VOQ'S

### 1. 10168043 JTDCB20UX53 [REDACTED]

Recall campaign 60C (06V188) was performed on August 29, 2006, and a new Intermediate Shaft No. 2 with Sliding Yoke (P/N 04005-72147) was installed on the vehicle. On September 12, 2006, customer submitted a VOQ stating that "Total failure of steering" and the "Steering wheel just spun freely." On the same day, the customer reported the issue to Toyota stating that "hesitant to return vehicle to the dealer who might have caused the concern and will not return vehicle to that dealer." Toyota offered to escalate the case; however, the customer declined. On September 19, 2006, the vehicle was returned to the same dealership where the remedy had been performed, and the dealer installed another new intermediate shaft No.2 with Sliding Yoke (P/N 04005-72147). The dealer noted in the repair order that "improper installation of components performed as part of recall." The vehicle is within the scope of C0T (12V537), but the remedy has not yet been performed.

### 2. 10418710 JTDCB20UX4 [REDACTED]

Recall campaign 60C (06V188) was performed on August 15, 2006, and a new Intermediate Shaft No. 2 with Sliding Yoke (P/N 04005-72147) was installed. On August 6, 2011, the customer filed a VOQ stating that "service advisor indicated that steering yoke sub assembly and shaft assembly needed to be replaced because of binding." The repair order shows that the dealer replaced both Intermediate Shaft No.2 (P/N 45260-47052) and Sliding Yoke (P/N 45209-12201). On April 15, 2013, a repair order indicates that the bolt was replaced under recall campaign C0T (12V537). Increased backlash and

abnormal noise from the steering system are the precursors of spline wear; a binding condition is unlikely related to recall campaigns 60C and C0T.

**3. 10478195 JTDCB20U357** [REDACTED]

On June 27, 2006, the 60C (06V188) remedy was performed on this vehicle, and a new Intermediate Shaft No. 2 with Sliding Yoke (P/N 04005-72147) was installed. On October 1, 2012, the customer filed a VOQ stating that "the steering intermediate shaft splines were worn" and the incident occurred on August 19, 2012. On the same day, the customer reported the issue to Toyota stating that "the steering wheel column was replaced again at an independent shop." On January 30, 2013, the customer sent a letter to Toyota seeking pre-notification reimbursement for the August 20, 2012 repair under recall campaign C0T (12V537). On March 26, 2013, Toyota denied the reimbursement case as C0T is not related to Intermediate Shaft No.2.

**4. 10407520 JTDCB20U157** [REDACTED]

On March 22, 2007, the 60C (06V188) remedy was performed, and a new Intermediate Shaft No. 2 with Sliding Yoke (P/N 04005-72147) was installed. The customer filed a VOQ on June 20, 2011, stating that the vehicle was taken to a dealer on May 6, 2011 due to wobbles in the steering. The dealer did not find any problem with the steering, and advised the customer that the issue could be related to imbalanced snow tires. On May 26, 2011, the customer experienced "complete steering failure" and "the steering wheel spun unlimited number of times." The repair order dated May 28, 2011 shows that the vehicle was repaired with a new Intermediate Shaft No. 2 with Sliding Yoke (P/N 04005-72147) and a Cable Sub-Assy Spiral (P/N 84306-0E010). We do not have sufficient information to determine whether this repair may have been related to the March 22, 2007 repair or the May 6, 2011 complaint, but the customer was reimbursed for the repair expense as goodwill on October 26, 2011. The vehicle is within the scope of C0T (12V537), and the remedy was performed on January 16, 2013. The repair order indicates that the bolt was replaced.

**5. 10478053 JTDCB20U267** [REDACTED]

The repair order submitted on August 19, 2010 shows that the customer stated the "steering wheel very creaky" and the dealer advised to have the spiral cable replaced. On October 1, 2012, the customer filed a VOQ stating that "while reversing at 5mph, the power steering assist failed and the steering wheel could not be moved in either direction." Toyota also received a consumer complaint on September 17, 2012 stating that the "steering shaft is bent." Based on the Repair Order dated September 14, 2012, the vehicle was repaired with a new bolt w/washer (P/N 90080-11555), Intermediate Shaft No.1 (P/N 45221-47041), Yoke, Sub-Assy Steering Sliding (P/N 45209-12201), Post Assy, Electric Power Steering (P/N 45200-47063 which includes Steering Column & Intermediate Shaft No.2), and Cable Sub-Assy Spiral(P/N 84306-0E010). Because the majority of the steering system components were replaced at once, it is difficult to determine the primary cause of the steering concern. However, a steering binding or bent condition is unlikely related to recall campaigns 60C and C0T. The vehicle is within the scope of C0T (12V537), but the remedy has not yet been completed. On January 25, 2013, the customer sent a letter to Toyota seeking pre-recall reimbursement for the September 14, 2012 repair under recall campaign C0T (12V537). On April 9, 2013, the customer was reimbursed for the repair expense of Intermediate Shaft No. 1.



**6. 10473654 JTDKB20U063**

Based on a Carfax report, the vehicle was involved in a collision, and a salvage title was recorded on April 3, 2007. The customer submitted a VOQ on September 3, 2012 stating that the "steering shaft completely failed and vehicle could not be controlled or steered." The vehicle is not in the scope of the 60C (06V188) recall campaign. On February 13, 2013, the vehicle was inspected under recall campaign C0T (12V537), and a new bolt (P/N 04002-52112) was installed in the vehicle. Toyota does not have any additional information related to the collision in 2007, the salvage title record, or the steering concern in 2012. On February 27, 2013, Toyota received a pre-recall reimbursement request from the customer. On April 19, 2013, the customer was reimbursed for the repair cost for the parts listed in the recall campaign C0T.

**7. 10429551 JTDKB20UX77**

On August 4, 2007, a repair order indicates that the customer requested a new wheel rim due to damage. The customer submitted a VOQ on October 12, 2011 stating that "steering column shaft connection to the gearbox steering rack failed." The repair order dated September 30, 2011 shows that Intermediate Shaft No.1 (P/N 45221-47041), Cable Sub-Assy, Spiral (P/N 84306-0E010), and Gear Assy, Steering (P/N 45510-47021) were replaced. The vehicle is not in the scope of recall campaign 60C (06V188). On January 24, 2013, the customer sent a letter to Toyota seeking pre-recall reimbursement for the September 30, 2011 repair under recall campaign C0T (12V537). Toyota advised the customer to have C0T completed to ensure the customer has the most up to date part. On April 15, 2013, C0T (12V537) was performed on the vehicle and Intermediate Shaft No.1 (P/N 04001-41212) was replaced. On April 23, 2013 the customer was reimbursed for the repair expense related to the September 2011 repair. Toyota also offered a goodwill reimbursement for the parts not part of recall campaign C0T. There is insufficient information available for Toyota to provide any further comments.

**8. 10400074 JTDKB20UX93**

Based on a Carfax report, the vehicle was involved in a collision which was reported on August 5, 2009, and a salvage title was recorded on September 4, 2009. In the VOQ filed on May 5, 2011, the customer stated "hit a curb and the lost all steering." This incident reportedly occurred on April 29, 2011. The repair order dated May 3, 2011 shows that the vehicle was repaired with an Intermediate Shaft No.1 (P/N 45221-47041), and Cable Sub-Assy, Spiral (P/N 84306-0E010). The vehicle is not in the scope of recall campaign 60C (06V188). Toyota does not have any additional information related to the collision in 2009, the salvage title record, or the steering concern in 2011. On February 7, 2013, recall campaign C0T (12V537) was performed on the vehicle, and the Steering Shaft Bolt was replaced. On February 7, 2013, the customer sent a fax to Toyota seeking pre-recall reimbursement for the May 3, 2011 repair under recall campaign C0T (12V537), and reimbursement consideration is in progress.

**9. 10484757 JTDKB20U753**

Recall campaign 60C (06V188) was performed on June 23, 2006, and Intermediate Shaft No.2 (P/N 04005-72247) was installed. On August 15, 2012, the vehicle was involved in an accident. In the VOQ dated November 15, 2012, the customer stated that the "the steering became hard to control, which caused the vehicle swerved to the left." A Toyota field technical report related to this accident was completed on

February 21, 2013. The vehicle has been inspected at a salvage yard, which purchased the vehicle from the customer's insurance company after the crash. Some steering components were unavailable and the vehicle could not be moved. The steering wheel could be turned and the steering rack functioned, but was no longer connected to the steering knuckles, which had been removed. The vehicle would have been within the scope of C0T (12V537).

**10. 10489425 JTDKB20U853**

Recall campaign 60C (06V06188) was performed on June 29, 2006. Intermediate Shaft No.2 with Sliding Yoke (P/N 04005-72147) was installed on the vehicle. On December 20, 2012, the customer filed a VOQ stating that "when I made a turn either left or right that I heard and felt a clanking sound coming from the steering column." On January 4, 2013, the customer took the vehicle into an independent shop and had the Intermediate Shaft No.2 (P/N 45260-47052) replaced. The vehicle is also within the scope of recall campaign C0T (12V537), but the vehicle has not been remedied. On January 17, 2013, the customer sent a letter to Toyota seeking pre-recall reimbursement for the January 4, 2013 repair under recall campaign C0T (12V537). On April 10, 2013, Toyota denied reimbursement due to lack of supporting documents. There is insufficient information available for Toyota to provide any further comments.

**11. 10499778 JTDKB20U573**

The customer filed a VOQ on February 23, 2013 stating that "I heard a loud 'pop' and my car lost steering completely and immediately." On February 26, 2013, recall campaign C0T (12V537) was performed, and Cable Sub-Assy, Spiral (P/N 84306-0E010), Gear Assy, Steering (P/N 45510-47021), Intermediate Shaft No.1 (P/N 04001-41212) were replaced. This VIN is not in the scope of recall campaign 60C. Based on the available information, the steering concern appears to be related to recall campaign C0T (12V537).

**12. 10510722 JTDKB20UX53 (Additional VOQ)**

Recall campaign 60C (06V188) was performed on January 14, 2011, and a new Intermediate Shaft No. 2 with Sliding Yoke (P/N 04005-72147) was installed on the vehicle. On May 5, 2013, the customer filed a VOQ stating that "lost steering" on May 1, 2013. The repair order dated May 2, 2013 says "Found steering intermediate shaft yolk lower splines stripped and rotating." The recall campaign C0T (12V537) was also performed during the same vehicle repair, and Intermediate Shaft No.1 (P/N 04001-41212) was replaced. Customer contacted Toyota on May 6, 2013 to discuss the recall reimbursement process. Based on the available information, the steering concern may be related to recall campaign C0T (12V537).

**Conclusion:**

Based on available information, only four (VOQ's 10168043, 10478195, 10407520, and 10489425) out of 12 VOQ's appear to be related to a concern about Steering Intermediate Shaft Assembly No. 2. For those four cases, there is not enough information to determine if the steering allegation relates to a decoupling and/or separation of the Steering Intermediate Shaft Assembly No.2 from the steering column assembly. Of the remaining eight VOQ's, five (VOQ's 10473654, 10429551, 10400074, 10499778, and 10510722) appear to be related to other pre-remedy issues covered by the latest recall campaign C0T

(12V537) and three (VOQ's 10418710, 10478053, and 10484757) appear to be isolated incidents most likely unrelated to decoupling or separation of Intermediate Shaft No.1 (Upper) or No.2 (Lower). There is no observable trend.

1. For each of the vehicle identified in the twelve ODI complaints and in the petition, furnish the following:
  - a. Any steering system related service / warranty history
  - b. Any steering system related customer service / complaint records
  - c. Documents identifying when the remedies for Special Service Campaign (SSC) 60C and Recall C0T (NHTSA Recalls No. 06V188 and No. 12V537) were performed, if the vehicle was included in the recall(s).

### **Response 1**

The detailed information responsive to “a” through “c” is provided electronically on CD-ROM in the folder “Attachment-Response 1.”

2. Furnish the original and any revised repair procedures for SSC 60C and Recall C0T.

### **Response 2**

This information is provided electronically on CD-ROM in the folder “Attachment- Response 2.”

3. State the number of each of the following, received by Toyota, or of which Toyota is otherwise aware, which relate to the alleged defect in the subject vehicles (excluding the vehicles referenced in Request No. 1).
  - a. Consumer complaints, including those from fleet operators;
  - b. Field reports, including dealer field reports;
  - c. Reports involving a crash, injury or fatality;
  - d. Property damage claims; and
  - e. Third-party arbitration proceedings where Toyota is or was a party to the arbitration; and
  - f. Lawsuits, both pending and closed, in which Toyota is or was a defendant or codefendant.

For subparts “a” through “d,” state the total number of each item (e.g., consumer complaints, field reports, etc.) separately. Multiple incidents involving the same vehicle are to be counted separately. Multiple reports of the same incident are also to be counted separately (i.e., a consumer complaint and a field report involving the same incident in which a crash occurred are to be counted as a crash report, a field report and a consumer complaint).

In addition, for items “c” through “f” provide a summary description of the alleged problem and causal and contributing factors and Toyota’s assessment of the problem, with a summary of the significant underlying facts and evidence.

### **Response 3**

Excluding the vehicles referred to in Request No. 1, Toyota has not located any requested information that indicates a decoupling or separation of the steering intermediate shaft assembly from the steering column assembly in the subject vehicles.

4. Separately, for each item (complaint, report, claim, notice, or matter) within the scope of your response to Request No. 3, state the following information:
  - a. Toyota's file number or other identifier used;
  - b. The category of the item, as identified in Request No. 3 (i.e., consumer complaint, field report, etc.);
  - c. Vehicle owner or fleet name (and fleet contact person), address, and telephone number;
  - d. Vehicle's VIN and date of manufacture;
  - e. Vehicle's make, model and model year;
  - f. Vehicle's mileage at time of incident;
  - g. Incident date;
  - h. Report or claim date;
  - i. Whether a crash is alleged;
  - j. Whether property damage is alleged;
  - k. Number of alleged injuries, if any;
  - l. Number of alleged fatalities, if any; and
  - m. Whether the vehicle was included in SSC 60C and/or Recall C0T, and if so, whether the remedies were performed and when they were performed.

### **Response 4**

Excluding the vehicles referred to in Request No. 1, Toyota has not located any requested information that indicates a decoupling or separation of the steering intermediate shaft assembly from the steering column assembly in the subject vehicles.

5. Produce copies of all documents related to each item within the scope of Request No. 3. Organize the documents separately by category (i.e., consumer complaints, field reports, etc.).

### **Response 5**

Excluding the vehicles referred to in Request No. 1, Toyota has not located any requested information that indicates a decoupling or separation of the steering intermediate shaft assembly from the steering column assembly in the subject vehicles.

6. State, by model and model year, a total count for all of the following categories of claims, collectively, that have been paid by Toyota to date that relate to the alleged defect in the subject vehicles: warranty claims; extended warranty claims; claims for good will services that were

provided; field, zone, or similar adjustments and reimbursements; and warranty claims or repairs made in accordance with a procedure specified in a technical service bulletin or customer satisfaction campaign.

Separately, for each such claim, state the following information:

- a. Toyota's claim number;
- b. Vehicle owner or fleet name (and fleet contact person), address, and telephone number;
- c. VIN and date of manufacture;
- d. Repair date;
- e. Vehicle mileage at time of repair;
- f. Repairing dealer's or facility's name, telephone number, city and state or ZIP code;
- g. Concern stated by customer;
- h. Comment, if any, by dealer/technician relating to claim and/or repair; and
- i. Whether the vehicle was included in SSC 60C and/or Recall C0T, and if so, whether the remedies were performed and when they were performed.

## **Response 6**

Toyota has not located any requested information that relates to the alleged defect in the subject vehicles. To the extent that claim information relates to the vehicles identified in Request No. 1, such information is provided with the response to that Request.

\* \* \*

Data provided in this document is current as of the following dates:

Response		Dates
Response 1	Information related to VOQs	6/17/2013
Response 3	Consumer Complaints	6/17/2013
	Field Reports	6/17/2013
	Dealer Reports	6/17/2013
	3 <sup>rd</sup> Party Arbitration	6/17/2013
	Lawsuits, Claims and Notices (from Legal Department)	6/17/2013
Response 6	Warranty claims	6/17/2013
	Goodwill	6/17/2013
	Extended warranty claims	6/17/2013

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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 Legal Department, other Toyota employees, or employees of parties represented by Toyota in litigation and claims; (b) communications between employees of Toyota's Legal 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 Legal Department, including work product of employees or consultants done for or at the request of outside counsel or Toyota's Legal 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.